



21 October 2025

Victorian Planning Authority

c/- East of Aberline Precinct Structure Plan

GPO Box 2392

Melbourne, VIC 3001

Dear Sir / Madam

**Draft Amendment C217warr, East of Aberline Precinct Structure Plan,
Gateway Business Park, Horne Road, Warrnambool**

1. This submission is made on behalf of NDB Properties Pty Ltd, the owner and developer of land within the Gateway Business Park (also referred to as the Horne Road Industrial Precinct), located immediately south-east of the East of Aberline Precinct Structure Plan (PSP) area.
2. Development within the Horne Road Industrial Precinct is guided by the Horne Road Development Plan (2015) and has been progressively developed over the past decade. The estate now accommodates a mix of established and emerging industrial operations that make a significant contribution to Warrnambool's employment base, including asphalt production, waste transfer, logistics, and other service industries.
3. The East of Aberline PSP introduces new urban development immediately adjoining the industrial estate. It is therefore essential that future land use and development within the PSP recognise and respond to the operational realities of adjoining industry - particularly in relation to amenity, noise, and long-term land-use compatibility.
4. While odour and dust have been effectively resolved through the Adverse Amenity Impact Assessment (GHD, May 2025), industrial noise remains a live planning consideration along the Horne Road and Rodgers Road interface.
5. The GHD report identifies a noise-influence area of approximately 300 metres extending north and west from the industrial precinct. This area includes:



- a. the Wannon Water treatment plant,
 - b. land at 124 and 140 Boiling Down Road,
 - c. the south-eastern corner of 135 Boiling Down Road, and
 - d. the southern portions of 150 Horne Road and 53 Rodgers Road.
6. Within this area, GHD's modelling and field measurements found that night-time industrial noise - principally from logistics, loading and heavy-vehicle activity - will be perceptible, and in some locations may exceed EPA Night-time Noise Limits if sensitive uses are introduced without adequate separation.
 7. The assessment also confirmed that dwellings located within this area may be unable to include openable habitable-room windows facing the industrial estate without breaching EPA noise criteria.
 8. While not explicitly stated in the report, it follows that reliance on sealed facades or mechanical ventilation would reduce opportunities for natural ventilation and cross-flow, limiting the ability for residents to open windows for comfort or cooling. This has the potential to erode the quality of living typically expected in a regional environment and represents a less desirable long-term outcome compared with achieving compliance through land-use separation.
 9. The interface between the Horne Road Industrial Precinct and the East of Aberline PSP must be managed primarily through land-use planning controls, not reliance on built-form measures such as acoustic fencing, sealed facades, or mechanical ventilation. While these treatments may achieve technical compliance, they are not a sustainable or desirable long-term response. They tend to shift the burden of mitigation to future residents, reduce design flexibility, and can result in poorer liveability outcomes.
 10. In contrast, a land-use-based approach provides a transparent, enduring and equitable framework for managing amenity. By clearly identifying where sensitive and non-sensitive uses may occur, this method prevents conflict before it arises, gives certainty to both developers and the responsible authority, and protects the operational integrity of the adjoining industrial estate.
 11. The PSP should formally recognise and manage the interface through a mapped Industrial 3 Zone Noise Influence Area, consistent with the 300-metre zone identified in the Adverse Amenity Impact Assessment (GHD, May 2025). This area - as shown on Appendix 3 - should be supported by a land-use-first management framework to ensure compatibility between existing industrial operations and future neighbourhood development. Specifically:
 - a. Non-sensitive uses - such as service industry, light-industrial, commercial, or employment-supporting activities - should be prioritised within the mapped Industrial 3 Zone Noise Influence

Area, as they can comfortably operate within a higher ambient-noise environment and provide a practical and enduring transition to residential land.

- b. Where sensitive uses are proposed within this mapped area, a detailed acoustic assessment should be required to demonstrate compliance with EPA Publication 1826.5 prior to approval.
12. This approach preserves flexibility while ensuring that land-use planning remains the primary tool for managing amenity at the industrial–residential interface. It aligns with Clause 13.07-1S (Land-Use Compatibility) of the Victorian Planning Policy Framework, which seeks to avoid conflict between industrial and sensitive uses through appropriate spatial planning, transition areas, and the protection of existing industry.
13. Adopting this structure within the PSP would also promote greater consistency across the municipality and broader growth-area planning practice. Comparable approaches have been successfully applied in other Victorian PSPs, where noise-influence areas or “industrial interface” designations are used to guide both zoning and future assessment requirements. This ensures that industrial activity can continue to evolve without imposing unreasonable constraints, while providing a clear, evidence-based framework for evaluating sensitive development proposals.
8. NDB Properties Pty Ltd is committed to working constructively with the VPA, Council and affected landowners to refine the PSP and achieve a balanced outcome - one that safeguards existing industry, enables compatible development along the interface, and maintains high-quality residential amenity beyond it.
9. At present, the exhibited PSP does not strike the right balance between industrial protection and sensitive land-use management. However, with targeted refinements to land-use designation and interface planning, this can be readily achieved.
10. If these matters cannot be satisfactorily resolved, NDB Properties Pty Ltd wishes to reserve the right to appear before the VPA Standing Advisory Committee to present further evidence on amenity and interface planning.
11. Should you require any further information or wish to discuss the submission, please do not hesitate to contact me on [REDACTED]

Yours sincerely,

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