

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,
227 and 281 Wangoom Road, Warrnambool**

1. This submission is made on behalf of [REDACTED]
[REDACTED] located within the Moyne Shire immediately north of the East of Aberline Precinct Structure Plan (PSP) area.
2. The combined holding comprises over 300 hectares of productive agricultural land that supports a herd of approximately 600 milking cows plus young stock. The property includes a 60-head rotary dairy located within approximately 300 metres of the PSP boundary, with a feed pad positioned immediately east of the dairy.
3. The farm operates on a 24-hour, seven-day schedule, with the first milking commencing at around 4:30 am each day. Farming activities include silage production, tillage, spreading and crop spraying, including the use of broadleaf herbicides and insecticides. While these activities are carried out safely and in accordance with industry best practice, they can generate noise, odour, dust and light spill, particularly during early-morning or seasonal operations such as silage cutting and spraying.
4. The proposed urban expansion under the East of Aberline PSP will introduce new sensitive residential development within close proximity to these existing agricultural operations. There is a real and foreseeable risk that future residents could be affected by odour, noise, dust, and other emissions associated with lawful farming activity. In turn, this could lead to complaints, restrictions, or operational constraints that undermine the long-term viability of the farm.

[REDACTED]
[REDACTED]



5. These concerns extend to farm machinery movements and vehicle traffic along Wangoom Road, which is regularly used by farm staff and vehicles (including tractors, feed trucks, and farm bikes) during early-morning hours to access different parts of the property.
6. State planning policy under Clause 14.01-1S (Protection of Agricultural Land) clearly seeks to:
 - Protect productive farmland of strategic significance.
 - Protect agricultural land from unplanned loss due to permanent changes in land use.
 - Protect agricultural land from incompatible land uses.
7. The PSP, in its current form, does not adequately give effect to these principles in relation to the interface with productive agricultural land to the north.
8. The Adverse Amenity Impact Assessment (GHD, May 2025) acknowledges that odour, noise and dust may occur in proximity to agricultural operations but does not provide a clear strategy for managing this interface. As exhibited, the PSP risks establishing residential development in locations that will be sensitive to the normal and expected operations of the Pearse farm.
9. To ensure that both land uses can coexist, the PSP should be amended to:
 - **Define an Agricultural Interface Management Area** along the northern boundary of the PSP adjoining Wangoom Road.
 - **Restrict sensitive uses** (including dwellings) within this area unless supported by a detailed agricultural interface or amenity assessment.
 - **Encourage non-sensitive or transitional land uses**, such as open space, rural living, low-intensity commercial, or community infrastructure, to provide a buffer between existing farming operations and new residential areas.
 - **Acknowledge agricultural activity** as an established and ongoing land use in the PSP documentation and community information materials.
10. Our clients are very willing to work collaboratively with the VPA and Warrnambool City Council, as well as Moyne Shire Council, to explore practical interface management options. This could include the potential for the Agricultural Interface Management Area to be located within their property, provided that an appropriate change in land use is supported to facilitate such a transition. This cooperative approach would allow for coordinated planning and implementation of a functional and effective buffer that protects both the ongoing operation of the dairy and the amenity of future residents.

11. These measures would strike an appropriate balance between enabling urban growth and protecting the productivity and viability of existing agricultural operations. Without such provisions, there is a genuine risk of conflict that could constrain ongoing farming activity and undermine long-term planning outcomes for both land uses.
12. Our client welcomes the opportunity to work collaboratively with the VPA and Council to refine the PSP and ensure that appropriate interface management is embedded before the amendment proceeds to adoption.
13. If these matters cannot be satisfactorily resolved, our clients wish to reserve the right to appear before the VPA Standing Advisory Committee to present further evidence on agricultural interface management.
55. Should you require any further information or wish to discuss the submission, please do not hesitate to contact me on [REDACTED]

Yours sincerely,

[REDACTED]