

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,
Submission on behalf of [REDACTED]**

1. This submission is made on behalf of [REDACTED]. The property lies north-east of the East of Aberline Precinct Structure Plan (PSP) area, on the corner of Dixons Lane and Staffords Road, within the Moyne Shire. [REDACTED] concern relates to future traffic impacts on Staffords Road (south of Rodgers Road) and at its intersection with Rodgers Road.
2. The PSP proposes to designate Rodgers Road as a Connector Road, providing a continuous east-west link between Horne Road and Staffords Road. Although not explicitly modelled in the exhibited Integrated Transport Assessment (O'Brien Traffic, September 2025), this configuration will inevitably channel a share of PSP-generated traffic toward Staffords Road, offering an alternative connection to the Princes Highway.
3. Staffords Road currently functions as a sealed rural road to approximately 253 Staffords Road, beyond which it remains unsealed. The road forms part of the municipal boundary between Warrnambool City Council and Moyne Shire Council - with the northern section managed by Moyne and the southern section by Warrnambool.
4. Management of the Rodgers Road / Staffords Road intersection is unclear, as it sits directly at the intersection of the municipal boundary. Any future upgrade of this intersection would therefore require significant coordination between the two councils. The exhibited traffic assessment does not appear to account for eastbound traffic movements from the PSP toward the Princes Highway via Staffords Road.

[REDACTED]
[REDACTED]



5. With the introduction of the PSP, it is entirely foreseeable that Staffords Road will experience increased traffic volumes - both from residents within the PSP and from vehicles using it as an informal through-route between Horne Road, Rodgers Road and the Princes Highway. Without careful planning, this could lead to safety issues, amenity impacts and uncoordinated pressure on local-road infrastructure.
6. Despite this, the Integrated Transport Assessment provides no traffic modelling, upgrade strategy or cost-sharing mechanism for Staffords Road or its intersection with Rodgers Road. The omission of this connection from the modelling represents a notable gap in the PSP's transport and infrastructure planning.
7. Given the likely redistribution of traffic, the PSP should acknowledge Staffords Road's strategic function and address the following:
 - Undertake a detailed assessment of expected traffic volumes generated by the PSP that will use Staffords Road as an alternative route;
 - Identify and, if warranted, include the Rodgers Road / Staffords Road intersection as a Development Contributions Plan (DCP) item;
 - Require co-ordinated design and funding arrangements between Warrnambool City Council and Moyne Shire Council for any upgrade works; and
 - Ensure that road-upgrade obligations are shared equitably, reflecting the broader regional benefit rather than imposing the burden on individual landowners.
8. The upgrade of Staffords Road and its intersection with Rodgers Road will be complex, involving dual-council coordination, drainage design and potential land-acquisition considerations. These matters should be resolved at the PSP stage and funded through developer contributions proportionate to the external traffic demand generated by the growth area.
9. Failure to identify and plan for this connection now risks ad-hoc outcomes, safety concerns and inequity in infrastructure delivery. Staffords Road will ultimately serve future urban residents, commuters and service vehicles, not just existing rural landowners. The planning framework must therefore ensure that upgrades are planned, funded and delivered at a network level, consistent with the PSP's overall transport and access objectives.
10. Should these matters remain unresolved, Ms Ling reserves the right to appear before the VPA Standing Advisory Committee to present further evidence on road-network planning and equitable infrastructure delivery.

8. Should you require any further information or wish to discuss the submission, please do not hesitate to contact me on [REDACTED]

Yours sincerely,

[REDACTED]