

**Amendment C 217 warr - East of Aberline**

20 October 2025

Victorian Planning Authority  
GPO Box 2392  
Melbourne 3001  
via email: eastofAberline@vpa.vic.gov.au

Dear [REDACTED]

**Amendment C217 warr – [REDACTED]**

This submission is on behalf of [REDACTED], to amendment C217 and the proposed changes to the Warrnambool Planning scheme.

Specifically, the submission supports the amendment as exhibited subject to the suggested changes below. This submission is made as a basis for a submission to any future changes to the amendment documentation or Panel hearing relevant to the amendment.

**Background**

The subject site is located adjoining Aberline Road and constitutes the main interface with Aberline Road in the East of the PSP. It has a site area of approximately 47 Ha and is used primarily as grazing land. Refer to feature survey plan attached.

Prior to the exhibition of the PSP, commitments had been entered into to provide two independent schools (a Catholic Primary and Secondary school). The PSP has recognised this commitment in designating the two sites.

The balance of the site is identified as residential land use and creek reserve with associated storm water management infrastructure.

**1. Submission to PSP Document**

The following constitutes the key elements of this submission where change or further certainty is sought for the PSP and supporting planning scheme amendment.

## 1.1 Drainage Reserve land area

While it is understood that the PSP is a document that allows some flexibility, through the “generally in accordance provisions” and that the September 2025 Drainage report exhibited with the PSP seeks to reduce the land area for drainage reserves from that identified in the PSP and PAO, greater clarification is sought.

While this is understood to be a matter that will also need to be resolved prior to adoption of any final drainage scheme with Warrnambool City Council as drainage authority, additional assessment will be undertaken by the landowner to further confirm the ultimate land area requirements. This will be undertaken in consultation with Warrnambool Council.

### Proposed change

The ability to submit additional information to the Amendment process prior to and as part of any Panel Hearing is reserved, and should any further land area reductions be possible, that those changes be included as part of any final PSP and amendment documentation.

## 1.2 Residential Densities

3.1.2 *Viable Densities* identifies, under requirement R1 and in plan 3 that the southern part of the subject site (south of Russell Creek), as “Housing Choice Area 1” designation. This provision specifically references table 1 which applies, with plan 3, a minimum density of 20 lots per Ha.

When preparing a plan of subdivision, a minimum 3,000m<sup>2</sup> per Ha must be dedicated to provision of roads and laneways, this leaves approximately 7,000m<sup>2</sup> to provide the 20 lots or an average lot size of 350m<sup>2</sup>.

While it is accepted that this requirement is expected to deliver a variety of lot sizes, arguably between 200 and 600m<sup>2</sup>, the ability to provide a significant proportion of small lots in a Warrnambool market context is difficult, with average lot sizes at approximately 550 m<sup>2</sup> at present in the outer greenfield areas.

While the subject area is within proximity to Russell creek and proposed wetlands there are few real assets to attract that sector of the market likely to occupy smaller (200m<sup>2</sup> to 300m<sup>2</sup>) lots.

The market in Warrnambool is changing and over time such densities may be possible but currently the market is unlikely to take up a significant smaller lot component. Forcing an outcome that the market will not accept further risks restricting the timing of development of this part of the PSP which is essential to provide some of the infrastructure to service the balance of the PSP area development.

The objective to seek to increase density is laudable but rigid requirements may not be successful. Developers will seek to meet the market and will deliver diversity of housing, but it may not be feasible to reach the target specified.

#### Proposed Change

The Requirement R1 should not form a mandatory density but should be an *Objective*. Modified wording to that effect should be introduced to the PSP.

### 1.3 East West Connector – south of Russell Creek

The general location of the road and the reason for its provision is understood and is supported. Subject to the type of residential development proposed, options to adjust the connector road intersection with Aberline road and the location on the east/west alignment is sought. Any alternative intersection point will need to be supported by a traffic assessment and indicative intersection design.

#### Proposed Change

Confirmation that an option to shift the roads east/west alignment is sought.

## 2. Development Contributions Scheme

Subject to the outcomes of the above further investigations and in reserving the right to respond to other submissions and potential amendments to the Development Contributions plan, further comment may be made to the DCP.

#### Proposed Change

Arut reserve the right to make further responses to the DCP as part of any post exhibition review and respond to changes that may be proposed post exhibition and at any future panel hearing.

### 3. Submission to Environmental Audit Overlay EAO provisions

At the time of the preparation of this submission an environment audit for the subject site has commenced. Subject to the outcome of the audit, additional information will be provided to the VPA and Council. The objective is to have a certificate of Environmental Audit or similar prior to finalisation of the Amendment.

#### Proposed Change

That the option to present and audit and outcomes be reserved and that if acceptable, the Environmental Audit Overlay be removed from this site.

#### Conclusion

In lodging this submission, Arut reserve the right to make further submissions to any changes to the exhibited amendment documentation and respond to submissions by agencies and other parties making submissions.

Should you have any queries Please contact me on [REDACTED]

Yours faithfully

