

The amenity concerns are also not addressed. Will there be proportionate changes to and reduction to shed sizes? Or will our wonderful rural environment soon resemble an industrial estate and big sheds right on peoples' boundaries?

Bushfire Risk

I have read and entirely support the Submission by [REDACTED] C87 should not proceed until the safety issues described in her submission are addressed and relevant guarantees for Community Safety are provided.

Amendment C87 must be withdrawn because it builds on outdated information and planning practices. The Strategic Bushfire Risk Assessment underpinning the Amendment and its associated Structure Plan was conducted using an outmoded strategy and weather data that is more than a decade old. It takes no account of the Climate Crisis and the likelihood that the weather will be worse for bush fires than Council's consultants' antiquated data and predictions show.

Moreover, the current version of Planning Practice Notice 64 advises against planning developments in high bush fire risk areas and in areas with one access/egress, eliminating Growth Area 3 as an option for development

For these reasons, Council is now on notice through [REDACTED] carefully researched submissions and, as previous Royal Commissions have demonstrated, will risk defending very expensive class action litigation in the event of a catastrophic bush fire which results in property damage or loss of life.

Surely it is better to resolve these issues before endorsement.

Education

We have read and endorse the submission made by [REDACTED] for the reasons she provides. We will not repeat them.

The number of children living in Inverleigh, and therefore the number of children wishing to attend Inverleigh Primary School, will increase by a minimum of 30% but easily up to 60% over the duration of the Structure Plan, yet there are no definitive commitments made to accommodate this growth. Indeed the State Governments Building for Schools shows that there is no proposal for any building works in Inverleigh between now and 2027. The State Government priority is on Melbourne and its rapidly growing population.

C87 simply passes the risk, cost and problem to the State Government and leaves families in the lurch.

Furthermore the lack of public transport and GPSC's unwillingness to even lobby G21 for improvements will require the new residents to have to drive to Bannockburn or Geelong simply so that their children can go to primary school.

C87 should be deferred until there has been a proper consultation with Council, the Community, the School and the Department of Education to address the consequences of the C87 Consultants pipe dream.

Road Safety

We are opposed to the approval of elements of Amendment C87 to the Golden Plains Planning Scheme as the published documentation does not demonstrate adequate consideration for the road safety protection of members of the Inverleigh Community, visitors and wider users of the Hamilton Highway that flow from C87.

The Developer contributions to the necessary upgrading of Common Road, Inverleigh Teesdale Road including Two Bridges, the stipulated safety upgrades of the Hopes

Plains and Common Road intersections on the Hamilton Highway, as required by the Department of Transport and to upgrade new and adjoining existing Bicycle Paths to Australian Standards have not been independently assessed by experts or adequately costed.

Consequently, the Developers' contribution to each necessary component is at best an educated guess. Importantly, the contribution is also not locked in or guaranteed in the published papers.

The traffic use assumptions made in respect of Common Road and the Hamilton Highway in the published documents do not comply with relevant Road Safety best practice or standards, and the Hamilton Highway data assumptions are not consistent with contemporary evidence the Council already holds but has not published in C87.

Golden Plains Shire Council (GPSC) is a Victorian local government entity that is a designated Road Safety Partner in the whole of **Victorian Government Towards Zero Strategy** and Commitment. The objective of the Strategy is to reduce the number of fatal and serious injury casualty crashes to Zero in a measured time frame. C87 does not address GPSC's responsibility as a road safety partner.

The community has made Council aware of the number and details of serious injury casualty crashes on the Hamilton Highway between Common Road and the Teesdale Road in the last five years.

The Amendment to C87 should not be approved or endorsed until the critical road safety challenges identified have been properly considered by independent recognised and accredited road safety experts, and relevant consequential and necessary amendments to C87 made. The upgrades are likewise intrinsically addressed in the Bush Fire chapter to this submission and Prof Guijt's specific bushfire submissions.

In addition, C87 should not be approved or endorsed until all of the relevant Department of Transport road safety treatments and the described local road upgrades have been independently assessed, costed and a rigorous implementation plan endorsed. GPSC has already said it will not contribute to the Hamilton Highway upgrades and the Department of Transport also has not budgeted for it saying it is a GPSC/Developer issue.

C87 cannot be responsibly endorsed or approved until this imperative road safety improvement work is properly assessed, costed and budget provision formally approved by both GPSC and the Department of Transport.

The Developers' capital contribution to this work must be independently assessed and then guaranteed in advance with a consequential formal undertaking by Council that it will not forgive or reduce the Developers' assessment below the independently assessed cost.

The Amendment and subsequent development should not be allowed to proceed without these necessary safeguards in place. Otherwise the lives of Inverleigh residents and Victorians will be put at avoidable risk.

The Australasian College of Road Safety has recently published research on the reasons why Local Government is often the weak link in Australian road safety outcomes.

C87, properly assessed, revised, objectively budgeted for and delivered, would provide the opportunity for GPSC to prove itself to be a leader and an exception to the rule. The Inverleigh Community and the Victorian Road Safety Partners should expect nothing less.

Local Roads including Traffic Data and Assumptions

- Common Road, Hopes Plains Road, Teesdale Road and methodology criticism and compare Hamilton Highway consideration below.
- 100kph on Common Road not Road safety compliant and requests to reduce limit ignored.
- Guarantee Developer contribution and time frame for completion of upgrades

The Hamilton Highway and C87

- Traffic count in C87 based on 2007 figures. Council's independent (sic) traffic count in 2019
- Mix of very heavy transport, cars, bicycles, motorcycles and pedestrians and 60kph limit. Should it be 40kph and with a proper pedestrian crossing
- DOT demands for Hopes Plains Road and Council's guestimate of Common Road upgrade (circa A\$750K)
- Inverleigh Streetscape Plan data and information not included in C87 - contradicting assumptions
- Casualty and other crash data and information held by Council and its traffic consultants
- Developer and Shire to Guarantee cost of upgrades will be met.

Bicycle Safety

- C87 makes bland statements and assumptions about children riding to school
- New and existing bicycle paths are currently not compliant with Australian Standards for designing for bicycle safety
- Developer contribution is not stated but should be mandated unless GPSC has budget allocation to do so

C87 should not be further considered, much less endorsed and approved, until the above has been addressed, costed and Developer contribution determined and guaranteed.

Wildlife

I have read and agree with the submissions by Andrea Bolton and the IAG about wildlife that is an integral part of our amenity that is threatened by C87 in its current state.

Agriculture

Inverleigh has a diverse group of intensive small scale agricultural businesses which, given a situation where there is a lack of diversity in block sizes, are at an increased risk of a decrease in their sustainability and health. Diversity in block sizes is essential to allowing people the country lifestyle choice (something that was repeatedly highlighted in the Golden Plains Shire Inverleigh Structure Plan 2017 survey results). It is imperative that we protect, maintain and allow into the future, Golden Plains Shire's own position of supporting and promoting productive and sustainable, diverse and intensive small scale agricultural and rural enterprises. (See 3.9 Golden Plains Rural Land Use Strategy). A blanket 0.4 hectare block size results in no future businesses of these types which is contrary to both documents mentioned above.

Water and environment concerns

We oppose C87 being endorsed until all of the environmental concerns, including unsewered block run off, are properly considered. Other submissions address this well and we support them.

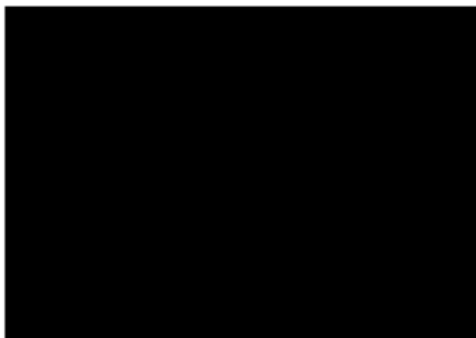
Specifically I have read and support former councillor [REDACTED] learned submission on water provision. None of his contentions have been explored as proper community consultation would have enabled.

Council performance doubts

The Golden Plains Shire Council has not performed to a standard that instils any faith in its capacity or will to represent the Inverleigh community into the future which undermines the premise of Amendment C87 and the protections for the community. Submissions from the Community and by us are all concerned about:

- the quality of the Inverleigh Structure Plan prepared by Consultants,
- the Golden Plains Shire's track record in Inverleigh of poor planning and stewardship,
- concerns for the staging of development to meet the stated moderate growth goal of 27 homes per year,
- Local Government Inspectorate Report March 2019,
- lack of transparency about or guarantees about the agency/developer contributions to Roads including the Hamilton Highway and 2 bridges at Teesdale/Inverleigh Roads,
- failure to consider asking the State Government to transfer the Inverleigh Flora and Fauna Reserve to it under C87 to ensure community bushfire safety
- the inadequacy of community engagement of the alignment of the proposed new clause for Inverleigh Local Planning Policy Framework
- below average poor performance in the 2019 State-wide local government survey and
- meaningful protection of Aboriginal cultural sites.

Yours sincerely





AMENDMENT C87gpla – INVERLEIGH STRUCTURE PLAN SUBMISSION FORM

PLEASE PROVIDE YOUR DETAILS BELOW

Name: [REDACTED]
 Address: [REDACTED]
 Contact telephone number: [REDACTED]
 Email: [REDACTED]

PLEASE PROVIDE YOUR SUBMISSION BELOW

My wife and I moved to Inverleigh because of its small country town lifestyle and low density housing. We would hate to see that destroyed by turning Inverleigh to a Bannockburn or like other estates in the Geelong or Surf Coast Shires. It is obvious to all people who visit these new estates that infrastructure for the residents is poorly planned and congestion on the roads is on the increase. Developers are only interested in making money - that's why they buy the land, the Shire needs to ensure that proper access roads are constructed to ensure that the flow of additional traffic moves freely.



The community needs to be heard, we have had a lot of meetings regarding the Street Scape plan - I think you (Shire CEO) have wasted about \$130k of rate payers money on plans that won't get Federal Government funding. You need to listen!

How will your expansion affect the School, Kindergarten, Sporting facilities, Roads, power supply, water supply? I am sure you have a plan but how long before it's implemented?

Unfortunately I don't think you will listen as you probably have already made up your minds and will disregard the Inverleigh Communities concerns, as Shires do.

*Please attach additional pages as necessary

Signature: [Redacted] Date 14/10/19



AMENDMENT C87gpla – INVERLEIGH STRUCTURE PLAN SUBMISSION FORM

PLEASE PRINT OR TYPE IN CAPITAL LETTERS

Name: [Redacted] *David*

Address: [Redacted]

Contact telephone number: [Redacted]

Email: [Redacted]

I have outlined my areas of concern below:

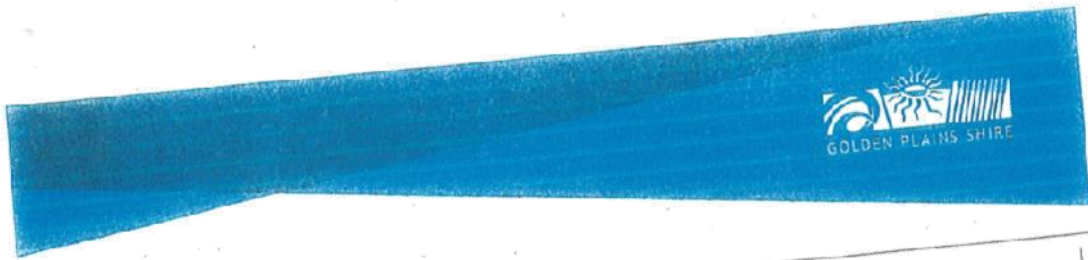
Bush Fire Risk and Strategic Bush Fire Risk Assessment
 Amendment C87 to the Golden Plains Planning Scheme fails to adequately assess the bush fire risk imposed by Inverleigh Nature Conservation Reserve (The Common). The bush fire risk is underestimated, the proposed bush fire risk mitigation strategy is unsound, and Common Road will serve as only access/egress for residents from Common Road, Mannagum Estate and potential Growth Area 3, as alternatives will be inaccessible due to smoke and ember attack.

Educational Facilities Impact
 Amendment C87 to the Golden Plains Planning Scheme should be withdrawn because it builds on outdated information and planning practices. The Strategic Bushfire Risk Assessment underpinning the Amendment and its associated Structure Plan was conducted using an outdated strategy and weather data that are more than a decade old. Moreover, the current version of Planning Practice Notice 64 advises against planning developments in high bush fire risk areas and in areas with one access/egress, eliminating Growth Area 3 as an option for development.

Retain Town Boundary
 The number of children living in Inverleigh, and therefore the number of children wishing to attend Inverleigh Primary School, will increase by a minimum of 30% but easily up to 60% over the duration of the Structure Plan, yet there are no definitive commitments made to accommodate this growth.

Inverleigh Flora and Fauna Reserve impact
 I confirm I support Strategy 1.1 of Amendment C87 to the Golden Plains Planning Scheme. I think it is imperative the existing township boundary of Inverleigh is maintained to retain and preserve our small country town lifestyle and our small, but highly valued, community, as well as protect the natural landscape and environment features unique to our town, as we know it.

Amendment C87 to the Golden Plains Planning Scheme has the potential for detrimental impacts on the 1050-hectare Reserve known as the Inverleigh Nature Conservation Reserve and locally as The Common. These include the effects on registered critically endangered flora, sustainability of biodiversity and the safety and health of the Common's wildlife, and omission of rezoning the northern section of The Common from farming zone. The submission expands on these issues and provides some mitigations strategies to be considered with any new development.



Sustainability and Health of small-scale intensive agricultural businesses

Inverleigh has a diverse group of intensive small scale agricultural businesses which, given a situation where there is a lack of diversity in block sizes, are at an increased risk of a decrease in their sustainability and health. Diversity in block sizes is essential to allowing people the country lifestyle choice (something that was repeatedly highlighted in the Golden Plains Shire Inverleigh Structure Plan 2017 survey results). It is imperative that we protect, maintain and allow into the future, Golden Plains Shire's own position of supporting and promoting productive and sustainable, diverse and intensive small scale agricultural and rural enterprises. (See 3.9 Golden Plains Rural Land Use Strategy). A blanket 0.4 hectare block size results in no future businesses of these types which is contrary to both documents mentioned above.

Unsewered lots

I think it is imperative, from an environmental and conservation perspective, due to the potential leeching of septic run-off to the Leigh River (and through to the Barwon River) from the natural slope on Common Road toward the Leigh River, with unsewered blocks posing a risk of contamination of our local natural waterways, that an investigation on the cumulative output from the septic systems and their likely impact on the river should be done as part of the assessment and viability for this development to proceed. Data collection from Site CO_LEI017 should be resumed ASAP to ensure data-driven insight in environmental changes and stormwater quality monitoring undertaken.

Sustainable development in Inverleigh

The current condition of the waterways running through and around Inverleigh are already under threat with relevant reports identifying the Leigh and Barwon rivers that large percentages are at poor or very poor condition, this report goes on to list the Key threats to the waterways as "Altered flow rates, eroded banks, damaged riparian vegetation and reduced water quality through sedimentation and effluent contamination". Future development will further impact these "High Value and Priority Waterways". If this alarms you, please read my overview on sustainable growth in Inverleigh and relevant facts that support my view.

Diversity of lot size

I am opposed to elements of Amendment C87 to the Golden Plains Planning Scheme, as it does not provide any form of compromise between "Inverleigh as we know it" and "Inverleigh as is proposed" in the Structure Plan, in relation to lot sizes. I believe the Structure Plan contradicts itself and is misleading when suggesting there will be lot sizes larger than 0.4ha in the proposed LDRZ areas.

Loss of faith in Golden Plains Shire and Amendment C87 best interests

The Golden Plains Shire has not performed to a standard that instils any faith in its capacity or will to represent the Inverleigh community into the future which undermines the premise of Amendment C87 and the protections for the community. Supporting information includes 1) the quality of the Inverleigh Structure Plan, 2) the Golden Plains Shire's track record in Inverleigh of poor planning and stewardship, 3) concerns for the staging of development to meet the stated moderate growth goal of 27 homes per year, 4) Local Government Inspectorate Report March 2019, 5) lack of transparency of agency/developer contributions, 6) failure to rezone as part of Amendment C87, the Inverleigh Flora and Fauna Reserve, 7) the inadequacy of community notification of the alignment of the proposed new clause for Inverleigh Local Planning Policy Framework 8) poor performance in the 2019 State-wide local government survey and 9) protection of Aboriginal cultural sites.

*Please attach additional pages as necessary

Signature: [Redacted] Date: 14/10/19

5220 7111

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AMENDMENT C87gpla – INVERLEIGH STRUCTURE PLAN SUBMISSION FORM

**SUBMISSION:**

I have outlined my areas of concern below.

Bush Fire risk

I attended the full day Panel Hearing in December 2018 re Amendment C74 for 230 Hopes Plains Rd development. Whilst at the Hearing, I lost my faith in authorised bodies to uphold and enforce principles and to properly govern risk that may ultimately lead to the loss of life.

Council representatives were also in attendance at the Hearing and witnessed what took place.

The CFA presented a document that drew a conclusion multiple times throughout stating in bold font *"...the planning scheme amendment does not meet State Planning Policy objectives and therefore should not proceed"*.

The Solicitor representing the Property Developer was quite irritated with the CFA's lack of advance warning that they would take this stance and set about intimidating the CFA for their surprise conclusion at the Hearing. The next event was astounding, the CFA cordially offered to cross a line through the words *"and therefore should not proceed"*. The CFA did a complete backflip upon bullying from the Property Developer!

The published Panel Report touched on the backflip but it is not clear to a first time reader of the written report what really occurred at the Hearing. ie. Section 3.3 of the Panel report states *"The CFA initially sought to suggest the Amendment should not proceed. This view took the parties by surprise at the Hearing, given the CFA's initial submission to exhibition of the Amendment. However, the CFA withdrew from this position..."*.

Prospective buyers of land within close proximity of the Inverleigh Common will believe that thorough checks have been properly done prior to development and will not know that the CFA took a stance against residential development to protect lives and then did an immediate backflip upon a dissatisfied reply from the Solicitor representing the Property Developer! The most astute and diligent person investigating all available documentation available before deciding to purchase land near the Common will not draw any doubt about the high danger to their families because they'll believe all Policy & learnings from the recent Bushfire Royal Commission have been implemented because the CFA and Council exist to represent their safety before development is allowed.

Therefore, I do not support the Inverleigh Structure Plan because it encourages population growth near the Inverleigh Common which has a high risk of bushfire and subsequent loss of lives. There has been a gross lack of transparency of the bushfire risk process made available to the general public and there has been a failure of governing bodies to enforce the State Planning Policy and Bushfire Royal Commission learnings.

Council's inability to properly manage stormwater flows

Again, I do not support the Inverleigh Structure Plan because the Council have demonstrated throughout recent history that they are unable to properly implement sound stormwater management plans.

In prior Barrabool Views & Mannagum developments, the Council authorised the property developer to direct stormwater into already existing stormwater drains which did not consider the downstream impacts and resulted in flooding to private property. The Council then undertook corrective works in 2018 at the expense of the ratepayers.

The same property developer is delivering the C74 230 Hopes Plains Rd subdivision and have engaged the same civil engineers. Their preliminary stormwater management design shows they will tap the stormwater into the same existing over-capacity drains with minimal investment, they also made it very clear at the C74 Panel Hearing that they will not reduce stormwater flows and it is not their responsibility to fix prior mistakes. The C74 Panel Hearing decided it is for the Council to review and ensure stormwater is managed properly in this upcoming development. The Property Developer is awaiting the approval of the Inverleigh Structure Plan so they can implement 1 acre lot sizes. The proposed 1 acre lot size will result in *more* stormwater runoff due to greater hardstand areas and the corrective works undertaken in 2018 remain untested due to low rainfall since then so the existing Faulkner Road drains cannot accept *any* water runoff from the new C74 subdivision.

Given the Council has allowed the developer to implement their designs in the past without consideration of downstream flows, I lack faith that Council will act in the best interest of the ratepayers, again.

Minimum Lot size

I do not support the reduced Lot size of 1 acre because it will result in the loss of character of the community. An overwhelming majority of respondents to the surveys undertaken by Council do not support 1 acre lot sizes for this reason yet the Council have prepared a Structure Plan that allows 1 acre lots!

Instead, I encourage the Council to have focus areas for population growth where infrastructure and services already exist (eg. Bannockburn) rather than implement blanket population growth across the whole shire.

If Inverleigh becomes another metropolis in a rural area, it can never be reversed. Infrastructure does not exist for future growth and there appears to be no shared responsibility with other bodies for forward planning, rather an ineffective '*it's their responsibility*' approach exists that results in a lack of services, overcrowded facilities, poor roads, greater reliance on commuting to larger cities etc... The media offers many examples of this occurring across Victoria yet it is being ignored here and now for Inverleigh.

The Council needs to pay thought to future areas of beautification in the shire that will be an attraction for tourists and local visitors in the future to enjoy rather than trying to appease developers now with fast developments that bring in quick rates for the Council.

Inverleigh is a beautiful town with character and is a great candidate for retaining it as it is for future generations to enjoy to live and/or visit.

Other Reasons

I have many other reasons for not supporting the Structure Plan which have been captured adequately by resident surveys and other submissions by the community to Amendment c87. I have not elaborated on them in great detail here but offer them in dot point format to ensure they are captured. Most of the areas of concern are good examples of the poor forward planning and "*it's their responsibility*" approach that exists in practice today.

1. Roads are insufficient

- a. **Hamilton Highway** – there are too many near miss accidents on this highway already due to the lack of overtaking opportunities, encouraging more residents in Inverleigh will increase the number of road users thus increasing the risk for injury/death from accidents.
- b. **Common Road** – multiple concerns:
 - i. A right hand turning lane from the Hamilton Highway does not exist
 - ii. the road is incapable of withstanding the increased volume of vehicles from the new planned 1 acre subdivisions
 - iii. one way out for a possible bushfire exodus in the Inverleigh Common
 - iv. the footpath adjoins the bitumen road in a section which is a massive safety concern for pedestrians
 - v. Installation of speed humps are not a feature cognisant with rural living
- c. **Hopes Plains Rd** – multiple concerns:
 - i. A right hand turning lane from the Hamilton Highway does not exist
 - ii. the poorly maintained gravel road is incapable of withstanding the increased volume of vehicles from the new planned 1 acre subdivisions
 - iii. due to the poor road condition and surrounding grassland it is not a satisfactory exit road for a possible bushfire exodus from the Inverleigh Common
- 2. **Public transport** – 1 public bus service on a Friday is insufficient. As population grows and climate change becomes a growing concern residents need options to commute to Geelong for work and services
- 3. **Employment opportunities** do not exist in Inverleigh so residents are required to own multiple cars and commute to employment in larger cities such as Geelong and Melbourne
- 4. **Crime** increases with population growth, especially when there is a lack of mobility, services and activities to occupy our youth
- 5. **Wildlife and Nature** – the Inverleigh Common has critically endangered flora and is home to much wildlife. As population encroaches around their border, the potential for damage and wildlife loss increases.
- 6. **Unsewered lots** – there is potential for leeching of septic runoff to the Leigh River and through to the Barwon River from the natural slope of on Common Road toward the Leigh River. This has a risk of contaminating our local natural waterways.
- 7. **Stewardship** - the Council has a poor record of representing the community views in their planning activities (eg. Streetscape plan). I am concerned the many community surveys, conversation posts, social media and publications offer a perceived view of consultation and listening to the community yet in reality they lack substance and adoption of the community views that are expressed. Please take notice of the community response to the Structure Plan and embed the majority consensus into the Plan. It does not currently represent the views of the Inverleigh community.

SIGNED:



Signature

15-10-19

Date



Attached below.

***Please attach additional pages as necessary**

Signature 

Date 15 October 2019

AMENDMENT C87gpla – INVERLEIGH STRUCTURE PLANSUBMISSION ATTACHMENT – 

Having read and considered Draft Inverleigh Structure Plan 2019, the following points are made in support of its adoption by way of Amendment C87gpla.


The Draft Inverleigh Structure Plan 2019;

- Acknowledges supports and builds upon retention of the country village character and appeal of Inverleigh.
- Retains the township growth boundary established by Inverleigh Structure Plan (ISP) 2005.
- Takes account of the higher rate of residential growth already experienced above that anticipated by ISP 2005 and continues orderly and respectful residential and commercial development.
- Provides opportunities for new residents to become a valuable part of the desirable Inverleigh community and lifestyle.
- Continues to support the scale and form of development established by ISP 2005 and identifies future investigation areas for residential and commercial growth.
- Facilitates sustainable development consistent with existing settlement patterns and aligns with Council and State Planning Policy in respect of minimum LDRZ lot sizes.
- Conforms to the strategic bushfire risk assessment that confirmed the appropriateness of six potential residential growth areas and identified measures necessary to minimise community risk.

Not – Supported:

- Reference (p.45; para 3) to potential establishment of a “small scale supermarket” seems inconsistent with findings that the township favourably relies on Bannockburn and Geelong for higher order retail services as an alternative to growing beyond the small commercial scale style village. The close proximity of Bannockburn furthers this objection.

Further Recommendations:

- That Council encourage developers to offer a range of diverse lot sizes both at and above the 4000sqm LDRZ minimum.
 - That Council ensures that new developments demonstrate appropriately graded lot size interfaces with adjoining residential areas.
 - That Council ensures EPA Wastewater Management guidelines are applied across all new developments.
- 

25/10/2019

altusECM

DOCUMENT (Inbound)		DETAILS	
Summary	Amendment C87gpla - Inverleigh Structure Plan Submission Form - [REDACTED]	Status	New
Information		Deadline	29/10/2019
Comments/Notes		Priority	Medium
		Received	15/10/2019 08:13:12 AM
		Type	Email
		Ref	IN19/77A17FF2
		On Hold	No

46

RELATED DOCUMENTS

PEOPLE (4)

Owner [REDACTED]
Manager [REDACTED]
Reader [REDACTED]

CONTACTS (0)

Name	Company	Email	Phone
No records found.			

FOLDER (1)

Number	Par	Name	Organisat	Uni
60-02-087	1	TECHNICAL OPERATIONS\PLANN ...amendment C87 Inverleigh Struc...	-Select-	- Sele

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Attachments:				Links:			
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No records found.				No records found.			

From: [REDACTED]
Date: Tue Oct 15 08:13:12 AM AEDT 2019
To: Enquiries<Enquiries@gplains.vic.gov.au>
CC:
BCC:
Subject: Submission to Amondmont C87gpla



We support the Amendment C87gpla in its entirety.

There has been so much misinformation perpetuated in the Community such as "We'll be exactly the same as Bannockburn". Well, no we won't.

If people actually took the time to read the document themselves rather than what is fed to them to scaremonger, they will see that most of their fears have been addressed, in our opinion, perfectly satisfactorily.

I urge Council to press ahead with the Amondmont which brings Inverleigh into line with rest of the State. The facilities and infrastructure that will follow on from the development are sorely needed in Inverleigh.

Kind regards

[REDACTED]

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1/2

25/10/2019

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2/2



15 October 2019

Dear Sir / Madam

Re. Golden Plains Planning Scheme Amendment C87 – Inverleigh Structure Plan

I refer to planning scheme amendment C87 to:

- Insert an amended Clause 21.07-5 Inverleigh
- Insert an amended Schedule to Clause 32.03 Low Density Residential Zone to the Golden Plains Planning Scheme following adoption by Council of the Inverleigh Structure Plan 2019.

It is undeniable that Inverleigh has become a popular place to settle, experiencing significant growth in a relatively short period. Whilst some growth is inevitable and necessary, it is considered the structure plan is fundamentally flawed in that it is not truly representative of the Inverleigh community's vision for the town and will irrevocably change the character and liveability of Inverleigh for the worse. It is questionable how significantly increasing the footprint of the town, at higher housing densities than present will 'Maintain Inverleigh's village atmosphere...'

Given Inverleigh's position in the landscape, even if perpetual growth were desirable, it is not possible due to physical constraints (flood, fire, natural environment), the desire to maintain non-urban break between townships and to retain productive farming land.

It is disappointing that the Inverleigh community has not formally been given the opportunity to comment on the final Structure Plan, including appendices, before it was adopted by Council at the meeting of 26 March 2019. Certainly, there has been a show of consultation throughout the development of the plan, however the reasoning given for aspects of the plan and its limited scope for review are questionable. For example:

- Council officers have stated from the outset that the current town boundary will not be changed (ie. reduced). This is short-sighted considering the boundary has been relatively unchanged since the mid 90's and is the result of developer/landowner advocacy rather than informed decision making.
- Similarly, there has been an attitude that minimum lot sizes must be reduced to 0.4ha simply because it is the default minimum. This attitude does not consider the suitability of land for development, neighbourhood character, existing constraints or mandate a more appropriate diversity of lot sizes.
- State policy states that each *municipality* must plan for 15 years lot supply – not each township, as has erroneously been stated by Council Officers. There is absolutely room for Inverleigh to play its part in the Shire's growth, however it should be modest in scale so as not to be at the detriment of the town's liveability and natural assets. There is also the lack of a broader municipal Settlement Strategy on which to base growth aspirations and justify projections outside of 'letting the market decide'.

Township boundaries must be clearly defined and unambiguous. It is generally considered

'Future Investigation Areas' do not fit this definition and are not good practice. Whilst the western 'Development Feasibility Study' goes some way to demonstrating the development bona fides of this land, it mainly presents vague concepts and does not present a strong case to keep this area within a formal boundary without future study. For example, the amendment does not propose 'Appropriate development planning controls...' (p14) to ensure development occurs in an orderly manner.

Council must be more selective on when it accepts rezoning and development applications. A common complaint is that Council cannot afford infrastructure upgrades required to service a growing town and cannot justify sufficient developer contributions to pay for all but minor works. This is primarily due to Council accepting applications on a piecemeal basis, and not having a comprehensive strategic infrastructure plan. CI 21.07-5 Strategy 4.5:

Support development that provides for the upgrade of roads, intersections and bridges where needed to service the development

is very poorly worded in that these works should be demanded as a matter of course, not used as an alternative funding mechanism in response to poor asset management or a bargaining chip to promote out of sequence or otherwise unjustified outcomes.

The structure plan makes little effort to identify infrastructure priorities, outside of the comprehensively rejected Streetscape Masterplan. Whilst Strategy 3.3 is laudable, Council must be diligent that any network of shared user paths within the Leigh River corridor is not simply the bare minimum, allows access for fire suppression and does not create a future maintenance liability as has occurred previously due to insufficient drainage on steep slopes.

There appears to be no advocacy or prioritisation from Council's perspective for works or service improvements by other agencies, whether that be road safety improvements or simply increased bus services. Council has a significant role in service planning for education and emergency management. Further growth of the town places additional stress on the kindergarten, primary school and CFA, all of which have little or no room for expansion; again, there is no commitment to work with the relevant agencies to ensure these services can be provided in a sustainable manner in the long term.

It is considered the amendment is premature, and should be abandoned until such time that a structure plan is developed that advocates for a sustainable Inverleigh, one that reflects the vision for maintaining the village character and identifies infrastructure priorities that can be funded by modest development.

Yours sincerely

██████████

██████████



AMENDMENT C87gpla – INVERLEIGH STRUCTURE PLAN

SUBMISSION FORM

PLEASE PROVIDE YOUR DETAILS BELOW

Name: [REDACTED]

Address: [REDACTED]

Contact telephone: [REDACTED]

Email: [REDACTED]

PLEASE PROVIDE YOUR SUBMISSION BELOW

I have outlined my areas of concern below:

Bush Fire Risk and Strategic Bush Fire Risk Assessment
 Amendment C87 to the Golden Plains Planning Scheme fails to adequately assess the bush fire risk imposed by Inverleigh Nature Conservation Reserve (The Common). The bush fire risk is underestimated, the proposed bush fire risk mitigation strategy is unsound, and Common Road will serve as only access/egress for residents from Common Road, Mannagum Estate and potential Growth Area 3, as alternatives will be inaccessible due to smoke and ember attack.
 Amendment C87 to the Golden Plains Planning Scheme should be withdrawn because it builds on outdated information and planning practices. The Strategic Bushfire Risk Assessment underpinning the Amendment and its associated Structure Plan was conducted using an outdated strategy and weather data that are more than a decade old. Moreover, the current version of Planning Practice Notice 64 advises against planning developments in high bush fire risk areas and in areas with one access/egress, eliminating Growth Area 3 as an option for development.

Educational Facilities Impact
 The number of children living in Inverleigh, and therefore the number of children wishing to attend Inverleigh Primary School, will increase by a minimum of 30% but easily up to 60% over the duration of the Structure Plan, yet there are no definitive commitments made to accommodate this growth.

Retain Town Boundary
 I confirm I support Strategy 1.1 of Amendment C87 to the Golden Plains Planning Scheme. I think it is imperative the existing township boundary of Inverleigh is maintained to retain and preserve our small country town lifestyle and our small, but highly valued, community, as well as protect the natural landscape and environment features unique to our town, as we know it.

Inverleigh Flora and Fauna Reserve impact
 Amendment C87 to the Golden Plains Planning Scheme has the potential for detrimental impacts on the 1050-hectare Reserve known as the Inverleigh Nature Conservation Reserve and locally as The Common. These include the effects on registered critically endangered flora, sustainability of biodiversity and the safety and health of the Common's wildlife, and omission of rezoning the northern section of The Common from farming zone. The submission expands on these issues and provides some mitigations strategies to be considered with any new development.



Sustainability and Health of small-scale intensive agricultural businesses

Inverleigh has a diverse group of intensive small scale agricultural businesses which, given a situation where there is a lack of diversity in block sizes, are at an increased risk of a decrease in their sustainability and health. Diversity in block sizes is essential to allowing people the country lifestyle choice (something that was repeatedly highlighted in the Golden Plains Shire Inverleigh Structure Plan 2017 survey results). It is imperative that we protect, maintain and allow into the future, Golden Plains Shire's own position of supporting and promoting productive and sustainable, diverse and intensive small scale agricultural and rural enterprises. (See 3.9 Golden Plains Rural Land Use Strategy). A blanket 0.4 hectare block size results in no future businesses of these types which is contrary to both documents mentioned above.

Unsewered lots

I think it is imperative, from an environmental and conservation perspective, due to the potential leeching of septic run-off to the Leigh River (and through to the Barwon River) from the natural slope on Common Road toward the Leigh River, with unsewered blocks posing a risk of contamination of our local natural waterways, that an investigation on the cumulative output from the septic systems and their likely impact on the river should be done as part of the assessment and viability for this development to proceed. Data collection from Site CO_LEI017 should be resumed ASAP to ensure data-driven insight in environmental changes and stormwater quality monitoring undertaken.

Sustainable development in Inverleigh

The current condition of the waterways running through and around Inverleigh are already under threat with relevant reports identifying the Leigh and Barwon rivers that large percentages are at poor or very poor condition, this report goes on to list the Key threats to the waterways as "Altered flow rates, eroded banks, damaged riparian vegetation and reduced water quality through sedimentation and effluent contamination". Future development will further impact these "High Value and Priority Waterways". If this alarms you, please read my overview on sustainable growth in Inverleigh and relevant facts that support my view.

Diversity of lot size

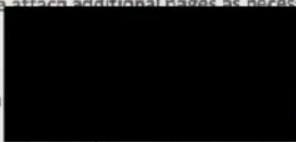
I am opposed to elements of Amendment C87 to the Golden Plains Planning Scheme, as it does not provide any form of compromise between "Inverleigh as we know it" and "Inverleigh as is proposed" in the Structure Plan, in relation to lot sizes. I believe the Structure Plan contradicts itself and is misleading when suggesting there will be lot sizes larger than 0.4ha in the proposed LDRZ areas.

Loss of faith in Golden Plains Shire and Amendment C87 best interests

The Golden Plains Shire has not performed to a standard that instils any faith in its capacity or will to represent the Inverleigh community into the future which undermines the premise of Amendment C87 and the protections for the community. Supporting information includes 1) the quality of the Inverleigh Structure Plan, 2) the Golden Plains Shire's track record in Inverleigh of poor planning and stewardship, 3) concerns for the staging of development to meet the stated moderate growth goal of 27 homes per year, 4) Local Government Inspectorate Report March 2019, 5) lack of transparency of agency/developer contributions, 6) failure to rezone as part of Amendment C87, the Inverleigh Flora and Fauna Reserve, 7) the inadequacy of community notification of the alignment of the proposed new clause for Inverleigh Local Planning Policy Framework 8) poor performance in the 2019 State-wide local government survey and 9) protection of Aboriginal cultural sites.

*Please attach additional pages as necessary

Signature



Date

15/10/19

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Sustainable Growth in Inverleigh 01-10-2019

I am writing to you to express my concerns regarding the currently under public review for endorsement, Amendment C87 to the Golden Plains Planning Scheme.

I am of the strong belief that the proposed amendment does not provide enough protection to ensure the Inverleigh town and surrounding areas maintain their unique attributes that makes it the desirable place to live and visit it has been and is today.

In particular but not limited to, the proposal to reduce the minimum block size to a blanket of 0.4 hectare is most concerning.

The proposed density of future developments has the potential to negatively impact on the environment, flora and fauna of the areas identified for future development and beyond. These identified future development areas will directly impact on the natural waterways, being; the Leigh River, Native Hut Creek and ultimately downstream to the Barwon River, as these water ways are either directly adjacent to the sites identified or directly downstream of the sites.

The Corangamite Waterway Strategy (CWS) 2014-2022 (Corangamite Catchment Authority being the governing authority responsible for the management of these waterways) details the current condition of the Barwon catchment basin (the catchment area that the proposed above-mentioned changes will impact) as being the worse of the two worst catchments of the four basins they control. It is interesting that the other basin of concern is the Moorabool Basin which also travels through the Golden Plains Shire (GPS) and is also impacted by significant population growth. The Barwon Basin (including Leigh Zone and the Mid Barwon Zone) was part of the statewide Index of Stream Condition (ISC) program that is an integrated snapshot of the condition of rivers, creeks and estuaries and was undertaken in 2010 which forms the basis for the condition reports that are referenced below and taken from the CWS. The investigations revealed that stream conditions across the Corangamite region varied, with the heavily forested Otway Coast basin in good and excellent condition, but with the Barwon basin having 17% at a very poor condition, 41% at poor condition, 37% at moderate condition, 4% at good condition 0% excellent and 1% insufficient. This compares to the average across

the 4 basins under CCA management; 13% Very poor, 23% poor, 45% moderate, 7% good, 11% excellent and 1% insufficient data.

The CWS describes the Leigh and Barwon Rivers and their tributaries as *“High Value and Priority Waterways”* with values of *“Significant Ecological Vegetation Classes, Significant bird species and important bird habitat, provides support for biodiversity including many species of fish and birds, remnant native vegetation and flagship species including Platypus and recreation, including picnicking, sightseeing, walking tracks and non-motor boating.”*

Also recognising the Key threats to the waterways as *“Altered flow rates, eroded banks, damaged riparian vegetation and reduced water quality through sedimentation and effluent contamination”*.

So, significant indicators that our local waterways systems are already under pressure without the additional potential impacts that these developments will bring.

The following factors will impact:

- 1) **Storm water runoff**; dramatically altered by the changes to the land by buildings, roads and other infrastructure and due to the altered natural flows of the landscape. Volumes and flow rates will be dramatically altered by the fact that the stormwater produced from the development sites will be concentrated to specific drainage systems not natural to the waterways (rivers and creeks), that will receive the stormwater drainage outputs.

Increase in pollutants and sediments within the stormwater due to population growth (human involvement) and what that brings with it (chemicals, plastic waste, animal waste and the like). This is also likely to be exacerbated by the change in weather events attributed to climate change. Forecasts from Bureau of Meteorology predict more violent weather events in the future where storms will be more intense in both their delivery and volume. In turn this will also impact on the ability of the waterways to cope with the stormwater delivered into the areas of development and ultimately the streams in larger volumes than ever received, now proposed to be directed into built systems that will change the stream shape and flows forever.

2) Leaching of effluent from wastewater systems; the septic wastewater management is governed by the EPA. But all waste water management systems are assessed and approved on an individual application, site by site, in conjunction with the Building permit application and managed by the Council Health surveyor. The Health Surveyor checks the proposed system against the EPA guidelines and Council's wastewater management policy. What's not accounted for in these systems performance is the waste sediment residue that remains in the ground once the moisture is evaporated. The residue made up of nutrients and salts as a result of the use of household chemicals, like washing powder and detergents.

Wastewater dispersal must be irrigated to not exceed the optimum water and nutrient requirements of the vegetation within the premises. Nutrient and organic uptake application rates are taken from EPA's Publication 168, Guidelines for Wastewater Irrigation, April 1991.

The guidelines and criteria followed for the design of proposed wastewater effluent dispersal area are based on EPA's Code of Practice for Onsite Wastewater Management, Publication 891.4.

The purpose of which is to protect public health and the environment. To this end it is a requirement of State Environment Protection Policy (Waters of Victoria) 2003, that wastewater performance minimum and maximum daily volumes that can be effectively treated on the property.

The risks that are associated with wastewater management is that while the system/s may be designed to perform at the required level to meet the needs of the site and anticipated use levels, the actual installed system may not perform at the designed performance levels, or not be maintained to ensure ongoing required performance levels. These systems require yearly and 3-5 yearly maintenance regimes to ensure ongoing performance levels are maintained. This maintenance requirement is not a mandatory requirement. There for property owners are not aware of this maintenance requirement, so not something that would be undertaken by the householder.

The reduced performance outcomes affect the system's ability to cope with:

- large shock loads or surge flows
- toxic substances like bleach, oil, paint thinners etc.

- being switched off for 1 week, 1 - 3 months or no inflow for 1 week or more.

The risk of effluent leaching to waterways is then multiplied by the size of the developments and density of these developments and is often only realised when it's developed, completely built out some years after and the developer long gone, along with his bags of money and no accountability.

In summary; I am not opposed to Inverleigh's development into the future, but growth of the population needs to be sustainable for both the environment and amenity of the area, that all future development takes into account the uniqueness of our town and enhances it and the surrounding district.

Council needs to demonstrate within the Inverleigh Town Structure Plan (ITSP) Amendment C87 GPLA, that developers will be made accountable to meet all requirements associated with environmental impacts of development of land within the GPS jurisdiction.

Developers need to prove that they have put appropriate protections in place to ensure;

- That the natural environment is total safeguarded by appropriate mitigation measures addressing all hazards to waterways, natural land, flora and fauna. This critical assessment and mitigation plan should be mandatory and referenced within Amendment C87 GPLA.
- That individual block sizes are large enough to cope with waste water impacts of the total development holistically, with no potential to have a detrimental impact on waterways both locally and downstream. I suggest a minimum lot size of 1 hectare be adopted within the Amendment C87 GPLA. This is currently and traditionally the minimum size of allotments in this zoning in and around Inverleigh and will maintain a consistent balanced approach to growth.
- That the infrastructure that is delivered as part of the built development; sealed roads, pedestrian paths, stormwater drainage systems, etc, must meet a set standard of design and built quality, to a minimum useful life of 50 years. This can be achieved by using the Infrastructure Design Manual, now adopted by Golden Plains Shire (2016), as the minimum standard for infrastructure design. This standard should now be referenced within Amendment C87 GPLA.

- That land release is restricted to ensure the designated development is providing building opportunities appropriate to Inverleigh's stated moderate growth goal of 27 homes per year. This should be controlled by staged releases of land over this period and should also be referenced within Amendment C87 GPLA.

AMENDMENT C87gpla – INVERLEIGH STRUCTURE PLAN

SUBMISSION FORM – The impact on the sustainability and health of small scale intensive agricultural businesses.

I am opposed to elements of Amendment C87 to the Golden Plains Planning Scheme for the following reasons:

Inverleigh has a diverse group of intensive small scale agricultural businesses which, given a situation where there is a lack of diversity in block sizes, are at an increased risk of a decrease in their sustainability and health. Diversity in block sizes is essential to allowing people the country lifestyle choice and encouraging the Council's own position of supporting and promoting productive and sustainable agricultural and rural enterprises (See 3.9 Golden Plains Rural Land Use Strategy). Examples of such businesses are as follows:

- a. Berry Organic in Savage Drive Inverleigh, are a mid-sized family owned and operated 5 acre Berry Organic Farm, producing premium quality Certified Organic Berries. Even though this is considered a non-traditional berry growing location, it has not deterred this family from growing outstanding quality berries. These fruits are renowned for their superior quality and flavour. Excess fruit is made into the Berry Organic range of jams and chutneys which are all certified 100% organic. Certified organic vegetables and other fruits may also be on offer.
- b. Vortex Veggies is a 16 acre certified Australian Demeter Biodynamic family owned and operated market garden since 1997, in Weatherboard Road, Inverleigh. They have consciously remained a manageable size operation so as to remain hands on in all areas of production and to maintain the integrity and quality of their produce. ABC TV's Landline featured this Inverleigh business on the 18th August 2019. With rezoning in Weatherboard Road to LRDZ areas after the broiler farm closes in 2020, it will result in most of that Road being surrounded on 3 sides by homes.
- c. Leighgrove Olives is a family owned and operated boutique olive grove, located on a picturesque stretch of the Barwon River. The 4500 tree olive grove is producing extra virgin olive oil of the finest quality. The cool climate conditions with a long, slow ripening period, together with the rich pastoral soils, results in oil of particularly deep, full flavoured characteristics. With more than ten different olive tree varieties originating from Tuscany, Greece and Spain, the range of flavours and styles of oil makes each season's harvest an exciting time at Leighgrove. Some are very fruity, whilst others are quite peppery and robust, each with its own character. In a true boutique way, the family's aim is to offer the finest quality they can achieve in a choice of styles to suit both differing tastes and culinary uses – to compliment all cooking. They are not bound by big supermarket demands for exactly the same taste each year – indeed the annual variations in temperatures, rainfall and quantities of fruit harvested are a welcome addition to the exclusive nature of their oil. The well-documented health benefits obtained by incorporating extra virgin olive oil into your daily diet is reason enough to insist on the best available product. Being a no-cholesterol monounsaturated fat, it contains the 'good fats' which in turn fight the 'bad fats'. The high level of Polyphenols are antioxidants which enhance the activity of the immune system. To ensure the retention of these, these olives are grown in accordance with modern, environmentally responsible practices, harvested at peak condition and processed quickly under modern hygienic conditions. This attention to

quality is what makes the difference to the final product – another reason to look for small, boutique grown oil where the grower knows the trees and the product intimately, and is not constrained by the demands of large-scale mass productions, where uniqueness of product is so often lost. On this same property The Farmgate Olive Shop sell home cure manzanillo or kalamata olives, sicilian olive relish, olive salt and dukkah all made by Leighgrove Olives, as well as soaps, skin creams and moisturisers, French provincial table linen and gifts.

- d. Jennings Honey is a family owned and operated bee keeping business situated on 2.3 acres in Common Road. The Jennings Family have kept bees for the past 25 years. They manage their own apiaries and their bees produce the best quality honey possible from healthy hives. Only the surplus is harvested, so the bees stay healthy. Their honey contains pollen, is 100% pure Australian and is cold extracted and a real hit with locals and visitors to the Inverleigh Lifestyle and Produce Market.
- e. Leigh River Roses is a family owned and operated business on Hopes Plains Road, Inverleigh. Grown in full sun on the fertile Western Plains of Inverleigh, Leigh River Roses grow roses the way nature intended – full of colour and full of scent. They grow a large range of garden roses in every palette, including the highly sought after, David Austin Roses. Their collection has been specifically chosen for their scent, colour and suitability as a cut flower – roses that will delight your senses – and are highly sought after at markets all around Geelong and district.

With the planned increase in population, associated with a blanket approval of 0.4 ha blocks, this will result in a lack of diversity of block size. With new homes and gardens comes the predicted increase in the frequency of use of herbicides and pesticides in people's gardens. The impact of such herbicides and pesticides on biodynamic and organic businesses from prevailing winds, will be detrimental to the health of these businesses. It would take approximately 2 years for these businesses to have their accreditation status restored if testing showed the presence of contaminating herbicides and pesticides. Therefore, overlays need to be put in place regarding the use of non-organic pesticides and herbicides within the areas of planned development.

Diversity in block sizes is essential to allowing people the country lifestyle choice (something that was repeatedly highlighted in the Golden Plains Shire Inverleigh Structure Plan 2017 survey results) and encouraging the Council's own position of supporting and promoting productive and sustainable agricultural and rural enterprises (See 3.9 Golden Plains Rural Land Use Strategy). A blanket 0.4 hectare block size results in no future businesses of these types which is contrary to both documents mentioned above.

<https://www.goldenplains.vic.gov.au/sites/default/files/RESULTS%20OF%20THE%20INVERLEIGH%20STRUCTURE%20PLAN%20SURVEY%202017.pdf>

AMENDMENT C87gpla – INVERLEIGH STRUCTURE PLAN

SUBMISSION FORM – Unsewered blocks

I am opposed to the Amendment C87 to the Golden Plains Planning Scheme due to the potential leeching of septic run-off to the Leigh River (and through to the Barwon River). On Common Road, the natural slope towards the Leigh River and unsewered blocks on that slope has the risk of contamination of our local natural waterways. Recommended buffer zones from septic systems to water bodies can be as large as 300 metres¹. While the Leigh River does not fit into the highest category there is real uncertainty about the combined impact of a significant portion of the 525 unsewered properties on a slope toward the river. An investigation on the cumulative output from the septic systems and their likely impact on the river should be done as part of the assessment and viability for this development to proceed.

In the Inverleigh Structure Plan 2018 Page 36 under Section 5.4.4. Loss of Biodiversity it states “The Leigh and Barwon Rivers provide valuable environmental corridors that need to be protected from development and pollution associated with stormwater and septic seepage. The extensive floodway and floodplain assist in the protection of these river environs, as does the Environment Significance Overlay 2 – Watercourse Protection”. For this reason, we request more detail on measures that will be taken to prevent septic seepage from adding to the nutrient load of the Leigh River, a river which is already carrying the nutrient loads from the Ballarat Waste Treatment Plant.

http://www.vic.waterwatch.org.au/cb_pages/monitoring.php

In the Inverleigh Structure Plan Review (2005)² and in the 2015 Domestic Wastewater Management Plan Volume 1 Golden Plains³, particular focus was given to disposal options, most of which remains relevant and is applicable to all unsewered towns.

- The structure plan review noted that existing smaller lots within the township zone already present a problem with effluent run-off from septic systems and development of the township-zoned area will remain severely constrained without the provision of suitable sewerage management facilities. Golden Plains Shire should obtain health and environmental information for Inverleigh such as odour issues within the township and the bacterial quality of flows in street drains and that bacterial sampling and tests should be carried out in accordance with procedures specified by a NATA accredited laboratory and should analyse for total and faecal coliforms.
- Representative locations in the township should be selected, and samples taken at each location on at least three occasions. The date/time of sampling and weather conditions should be recorded for each sample, as well as any other relevant information (e.g. recent rainfall). The situation at Inverleigh has changed very little since 2005, except that there is now perhaps more pressure for close-development

¹ <https://www.epa.vic.gov.au/~media/Publications/891%204.pdf>

²

https://www.goldenplains.vic.gov.au/sites/default/files/Ref%20141_Inverleigh_Final_Report_030305_incl_appendices.pdf

³

<https://www.goldenplains.vic.gov.au/sites/default/files/Golden%20Plains%20DWMP%20Volume%201%20Final%20V5r.pdf>, page 15

and less appetite from water authorities and state government to fund reticulated sewerage.

- Site CO_LEI017 is an active water watch location, however, pH and conductivity data have only been monitored between 2007 and 2015. Over this period, minimal changes in pH were observed, but salinity peaked in Spring 2008 at 2440 $\mu\text{S}/\text{cm}$, after which it rapidly dropped to 500 $\mu\text{S}/\text{cm}$ in January 2010, and increased to ca 1500 $\mu\text{S}/\text{cm}$ early in 2015. "In general, levels below 1,500 $\mu\text{S}/\text{cm}$ are considered to have minimal short-term effect on aquatic biota. Toxicity studies suggest a step-wise impact on biota, with more and more taxa being removed from the aquatic community as salinity rises. "http://www.vic.waterwatch.org.au/resources/Pages_from_WW_DI_MANUAL_PART_B_p_19_35_.pdf". The proximity of the most recent measurements of the Leigh river to the upper limit of 'normal salinity' at 1500 $\mu\text{S}/\text{cm}$, the Leigh can be considered vulnerable to additional nutrient load.

Data collection from this location should be resumed ASAP to ensure data-driven insight in environmental changes.

- The feasibility of sewerage for Inverleigh should be revisited, with a focus on alternative non-traditional means of collecting, natural treatment and disposal or reuse. However, there is a need to first build sufficient evidence to demonstrate that this is the best option for the town.
- The revised monitoring and audit program for existing systems (refer to Section 2.3) will lead to increased understanding of the quality of wastewater management in the town.
- We therefore request tests be conducted according to this document prior to the development on these rezoned areas within the township.
- It is also recommended that stormwater quality monitoring is undertaken and an engagement/education program is established for residents to promote best practice onsite wastewater management. Much of Inverleigh is subject to inundation from the Barwon and Leigh Rivers. Overlays showing the extent of floodway and land subject to inundation are shown in the planning scheme. Extra care is required when planning, installing and operating onsite systems on flood prone land.

These actions have not been undertaken to date, and the need for them to be undertaken remains.

http://www.ccma.vic.gov.au/admin/file/content2/c7/Upper_Barwon_Yarrowee_Leigh_FLOWS_study_update.pdf

AMENDMENT C87gpla – INVERLEIGH STRUCTURE PLAN**SUBMISSION FORM - Impact on The Common**

I am opposed to the approval of elements of Amendment C87 to the Golden Plains Planning Scheme because of the potential impact of the rezoning on the 1050 hectare Reserve known as the Inverleigh Nature Conservation Reserve, the Inverleigh Flora and Fauna Reserve or the Inverleigh Common, and locally and colloquially as The Common.

In addition, the impact of the omission in the amendment to address the anomaly of the northern section of The Common (Inverleigh-Teesdale Road and Bakers Lane) being zoned as farm land, when it is within the boundary of The Common and is looked after by Parks Victoria. The area of The Common south of the Inverleigh-Teesdale road is zoned as Public Conservation and Resource Zone (PCRZ). It is reasonable in the context of the Golden Plains Shire's stated role and goal of reassuring the Inverleigh Community of its future, that safeguarding The Common and its significance to the community by including the rezoning as part of the amendment.

I also have concerns of the complete removal of strategies related to The Common. The area is managed by Parks Victoria, however the decisions and impacts of Amendment C87 approval will affect this area and vice versa.

The Structure Plan lists the Inverleigh Community Plan as a key reference point in strategic plans and representation of the community's priorities, however it is a 2013 document, is therefore 6 years old and was, according to the document itself, to be updated every two years (page 6). There is no evidence there has been an evaluation of priorities met or of their ongoing relevance.

INVERLEIGH NATURE CONSERVATION RESERVE FLORA

Inverleigh is also famous for its 1,000ha reserve, three kilometres north of the township. **The Inverleigh Nature Conservation Reserve** was originally declared as the Inverleigh Common in the 1860's to provide a source of firewood for locals as well as somewhere to graze stock in times of drought. The wildflowers that are found there are so rare and numerous that it is now protected and it is illegal to collect firewood or graze stock. The Common is a space without facilities which is intentional.

The Common has significant and enduring connections with the Inverleigh Community and the community requires reassurance that the development of the land surrounding the Common is respectful, considers current environmental issues and aims to sustain the biodiversity of its flora and wildlife. This is captured through Recollections of The Common by three older gentlemen, whose families have lived here for generations.

West of the Inverleigh Common on Common Road is farmland that is now proposed to be subdivided into 0.4 ha blocks. Whilst wandering dogs cause problems with native animals, the major threat to native wildlife is cats. Domestic and feral cats can travel several kilometres at night or during the day. One conservative figure is that in

established suburban areas each house cat will kill at least 80 birds each year (Melbourne Zoo figures)¹

The Golden Plains Shire Amendment document and Structure Plan aims for a moderate growth of approximately 27 homes per year. If 50% of those new homes have a domestic cat, in the first year, an additional 1,080 birds will die in the first year, 2,160 in the second year, 3,240 in the third year and on, up to 20,000 per year by the end of the planned development.

Councils are introducing cat curfews and other initiatives to limit prowling and reduce the number of native animals and birds cats kill.

The City of Greater Geelong, The City of Kingston, The City of Greater Bendigo have all introduced a cat curfew between sunset and sunrise. Before implementing their cat curfew, the Mitchell Shire Council recently conducted a survey which showed 70% of people supported a cat curfew from sunrise to sunset bringing them in to line with many other Victorian Councils who have overnight or permanent curfews in place.

This problem is not isolated to Inverleigh with the Golden Plains Shire having a number of Reserves with endangered wildlife needing protection from cats as the population of cats associated with urbanisation increases.

We therefore recommend the following:

- Overlays on all properties opposite the Reserve requiring the owners of cats to install cat nets on their properties²
- And in particular Golden Plains Shire implement sunset to sunrise curfews on cats, and
- That the curfew is enforced

The Inverleigh Common is home to many native animals, all of whom are at increased risk of harm, from human population density and proximity, and loss of habitat. Road kill and maiming of our native wildlife increases each year because of an increase in the numbers of humans and their cars and their proximity to the Common. People come to live in Inverleigh to be on the land and enjoy open spaces and proximity to wildlife and nature. Police have been called out to shoot wildlife who have no chance of survival. Surf Coast Animal Rescue Service (SCARS) perform between 700- 1000 wildlife rescues a year. They have stated that there has been a 30% increase in road trauma to wildlife in the Surf Coast Shire associated with increased urbanisation.

¹ <https://mobile.abc.net.au/news/2019-09-20/nuisance-cats-in-council-crosshairs-in-adelaide/11527730?pfmredir=sm>

<https://www.abc.net.au/news/2019-09-20/nuisance-cats-in-council-crosshairs-in-adelaide/11527730>

² <https://catnets.com.au>

Rural Roads Victoria does not collect data on wildlife injuries and death associated with urbanisation and have sought this data from SCARS who do collect it.

Based on SCAR's experience and knowledge regarding wildlife injuries and death associated with urbanisation, they suggest the following remediations:

- Change Common Road's speed limit to no more than 60 kilometres an hour for the length of Common Road. This will give drivers the chance to avoid hitting wildlife and even if wildlife is hit, will give them a better chance of survival.
- A devoted 400m wildlife corridor on the westernmost part of the property 385 Common Road linking the Reserve with the River at its closest point and using the farmland west of the Inverleigh-Teesdale Road as a buffer zone, where wildlife are kept apart from human activity.

BIO-LINK

According to the Inverleigh Structure Plan³ page 41, "A Bio-link of a substantial width of at least 60 metres is to be provided as part of the proposed future rezoning and development of land in Common Road. The location of the Bio-link should align with existing vegetation and be of sufficient width to accommodate increased planting to allow wildlife to travel from the Flora Reserve to the Leigh River as well as provide for pedestrian and maintenance/emergency vehicle access and also be wide enough for the edges to be mown and maintained in a fire-risk reduced state, without compromising the sustainability of the link as a wildlife corridor."

However, according to the Biolink Alliance,

With rising global temperatures ensuring that species can move to more suitable habitat is essential. This means being able to move large distances (200-400 km). So we need to re-connect our important natural places at large scales. Maintaining genetic diversity is also vital for birds, wildlife and plants to be able to adapt to climate change. Habitats need to be connected to allow populations to share their genes. Connection of habitats is key to the long-term health of our ecosystems and the species they contain. Only through keeping them healthy will they be able to continue to provide fresh drinking water, storage of carbon, pollination of plants and crops and all the other things we rely on them for. 'Connectivity conservation' is a new and inclusive approach to address conservation on a large scale. It is about finding ways of restoring and reconnecting habitat, across land tenures, that benefits both people and nature⁴.

The 60-metre green link is not an exclusive wildlife corridor. According to SCARS there should be a major bio-link along the western boundary of the 385 Common

³

<https://www.goldenplains.vic.gov.au/sites/default/files/Inverleigh%20Structure%20Plan.pdf>

⁴ <https://biolinksalliance.org.au>

Road subdivision which would be vegetated and planted out, as this borders on rural land and where the Reserve comes closest to the River, linking the Reserve to the River. In the recognition of the effects of climate change, the Common does not have a year around water source for animals and it is essential that they are enabled to safely access to the river in periods of drought in line with what they have been doing for centuries.

ENDANGERED FLORA IN THE RESERVE

The Inverleigh Nature Reserve is home to an array of flora and fauna of which at least one species is on the endangered species list, refer Attachment 4.⁵ Prominent among the wildflowers found in the Inverleigh Nature Conservation Reserve are its orchids. There are over 50 different species here, the rarest being the Dwarf Spider Orchid. Another rare Spider Orchid which is named after the town is the Inverleigh Spider Orchid (*arachnorchis* sp Inverleigh), photos.mnr.id.au/2007/10/13/. This superb pink and white plant flowers between September and October, stands over 30 cm tall and is pollinated by a small thynnid wasp that is tricked into thinking it is mating with a female wasp of its species.

The Dwarf Spider Orchid (*Caladenia pumila*) is listed as “critically endangered” under the Commonwealth Government Environment Protection and Biodiversity Conservation Act 1999 (EPBC) Act⁶. After the orchid was first described in 1922, numbers declined until only two specimens were known in 1933. There were no records of the species from then and the species was presumed extinct. In 2009, two specimens were found in the Inverleigh Flora and Fauna Reserve. Efforts are being made to increase numbers. The main threats to the species are habitat degradation, trampling, competition with other species and a lack of genetic diversity.

IMPLICATIONS OF THE PLANNING SCHEME ON THE COMMON

The Planning Scheme amendments do not address the potential harm to the biodiversity of the Common with the rezoning and development and farming into 0.4 ha blocks. Urbanisation brings with it an increased demand for recreational space and a variety of activities in the space, such as off-road vehicle use, including motor bikes, illegal camping and gatherings in the Common which increase the risk of fires and damage to flora and the disruption to wildlife.

To mitigate the risk to wildlife and flora we therefore recommend the following, as part of the C87 Planning Scheme Amendments:

- Overlays on all properties opposite The Common requiring the owners of cats to install cat nets on their properties
- The Golden Plains Shire implement sunset to sunrise curfews on cats, and
- That the curfew is enforced
- A 173 Agreement for a Developer Contribution to establish a community-led Caretaker Program to work with Department of Environment, Land, Water and Planning and Parks Victoria to mitigate any potential problems to wildlife

⁵ <https://www.recreatingthecountry.com.au/wild-plants-of-inverleigh.html#>

⁶ <http://www.environment.gov.au/biodiversity/threatened/species/pubs/4155-listing-advice.pdf>

- and fauna associated with the urbanisation as a result of the Amendments already included in the Golden Plains Planning Scheme for 385 Common Road and 230 Hopes Plains Road, and future developments around The Common including Inverleigh and Teesdale.
- Rezoning of the north sector of the Common from farmland to Public Conservation and Resource Zone (PCRZ) as part of the Amendment C87 approval.