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Signature..... Date

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Page Hot T
GOLDEN PLAINS SHIRE
In paperties and demand. And in the interim till upprodes are made the impact it will have an our existing families till the growth is accommodated for. In conclusion we are concerned this ammendment in Conclusion we are concerned this ammendment will impact our lifescyle as we know it. We are finid our rural town is going to base its appeal and willage atmosphere with the proposed smaller bandsites. Grifety of an roads is a big ancern, and Im wondering if extending the existing settlement bandy would be a better aption where the highway would be more ascessible. The proposed this potential Grawth Area 3 will have an air an families Invelibeed - a neighboring agricultural form. At this point we fail to see how this ammundance will benefit curselves and air century of mail in air area?!

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Signature..... Date

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Page 10F4



AMENDMENT C87gpla – INVERLEIGH STRUCTURE PLAN

SUBMISSION FORM

PLEASE PROVIDE YOUR DETAILS BELOW

Name:	
Address:	
Contact telephone number:	
Email:	

PLEASE PROVIDE YOUR SUBMISSION BELOW:

I would like to appose removing the minimum lot sizes of
1-4 hectares and in particular to "Potential Growth Area 3"
which would have the biggest impact an our lives.
We came to Inverteigh to raise our family in the country
and enjoy the small circl community town village lifestyle.
While also being able to reside close to our family form.
Our main concerns for opposing are;
-7 Roads safely - congestion on Common Road and the
intersection anto Hamilton Hury. Hamilton Hury uscage is
already in high demand and certainly doesn't feel like -
sife highway to travel along. When you consider the
proposed increased population to hverleigh / shelford and
Teesdale with the potential increase in users conjection
on this highway will become extreme especially with

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tage 2 of 4

no overlaking lanes between Inverleigh and Geelong. hverleigh Freesdale Road twin bridges upgrade 11 ia to allow for heavy vehicle reduch mmon Road need the bridge is and would levels. bo (for => Potential evacuation hazards le in the scenario river flooding causing Leigh clos Rod Feesdale (which is of Common on an extreme some time danger day if there was a fire threatening there would be y to escape danger -Common cne Rd Hamilton Hwy. If including the everyone in our orea and "Astential Growth Area dramatically increase population of 3' could only get out one way this could be catastrophic. Hopes Plains Rd would certainly not be the quickest direct way out for our location. on neighboring rural farm land. The proposed =7 smaller lot sizes will devicusly mean greater population

*Please attach additional pages as necessary

Signature

. Date 15.10.19

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with more domestic animals leading to an increased accurance of unstepstrained dogs in particular gavaging livestock and killing neighboring tarms. We personally have had many accasions where this have happened to our livestock. With the increased population this on-going likely escalate. I would like to know problem would exactly what ensuring a clear separation between urban development and forming activities "means? Inverteigh Flora + Fauna => Impact on the Reserve "The Common" You frequently ara. see dead wildlife that has bit by been vehicles travelling Rd Inverteigh - Teasdate increase in population and read users this like Norst. Also the increase in domestic dogs/cats wildlife highly likely to impact on the local Systainability of air town hte concerned Kindergarten School Primar. and sportice about how our affected Comptexes are going to be with the increase

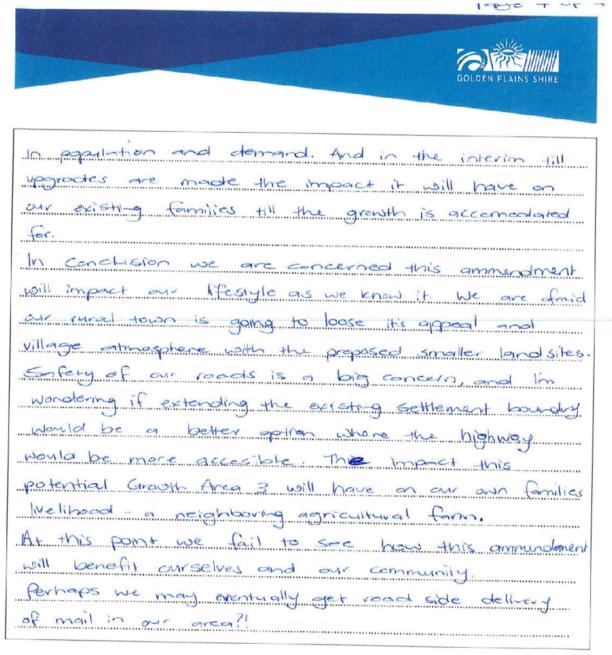
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Signature

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2. Infrastructure

The logical consequence of rapid population growth is a looming crisis for the primary school, the preschool and the roads. The primary school has been an idyllic scenario for young local children, with a large amount of open space, uncrowded facilities, and a relaxed atmosphere. The increase in enrolment over the past fifteen years has necessitated several new buildings and consequently loss of playground area. It's hard to envisage another doubling of the school population without undesirable loss of outdoor areas as they are consumed by further buildings. The school is big enough now - let it remain that way. When Bannockburn's population was growing rapidly in the last thirty years, the Education Department proved completely incapable of responding in a timely manner. The Bannockburn Primary School was past bursting point before the new school was even thought about seriously. I would hate to see the Inverleigh school go through the same crisis.

Council should be well aware of the capacity of the Inverleigh Pre-School at its present location. As the demand for pre-school services will be growing rapidly if the Inverleigh Structure Plan is adopted as policy, there will be another overcrowding crisis generated there unless Council bites the bullet and makes comprehensive plans for the future. The simple pie in the sky notion of using the Inverleigh Community Hall for a pre-school facility belongs on the brainstorming whiteboard, not in a serious planning document.

Many people have made the obvious observation that doubling the population will put a lot of pressure on Common Road and its intersection with the Hamilton Highway. There is likely to be daily congestion and, in the event of a serious bushfire, there could be very bad consequences.

3. Consultation

I think that consultation with the Inverleigh community has been tokenistic. There has been very little effort by Council to help residents to be well informed and to understand what is happening. I thought that there were going to be public meetings to explain the structure plan, but they didn't happen as far as I know, and I am on the Community Engagement Register.

I think that Council should have a series of meetings for Inverleigh residents, using a Question & Answer format, to educate the community about aspects of the Draft Structure Plan that they don't understand. I would like to ask questions such as:

- Why does Council want Inverleigh's population to grow so rapidly?

- What is wrong with the previous policy of having block sizes of 1-2 hectares?

- Whose interests are served by this rapid population growth and the change to smaller blocks?

- Why does Council appear to have a preferred developer?

- If the 'preferred' developer isn't willing to work with 1-2 hectare blocks, isn't there another developer who will?

- Exactly what obligations are imposed on Council by the State Government in regard to making new residential land available?

Who knows, there could even be further questions!

Finally, a few minor points.

1. The Draft Structure Plan refers to the 'common' using three different names, none of which is correct. The correct name is Inverleigh Nature Conservation Reserve.

2. A large chunk of the reserve (the section on the west side of the Inverleigh-Teesdale Road) has been chopped off in maps on pages 59, 60, 61, 63, 64 and 66.

3. Grooming of Acacia Paradoxa is primarily undertaken by Parks Victoria to reduce the proliferation of the shrub for environmental reasons. Any fuel reduction result is incidental and not the primary reason for the exercise.

Thank you for reading my submission.

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Department of Transport

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PO Box 775 Geelong, VIC 3220 Australia Telephone: +61 3 5225 2524 www.transport.vic.gov.au

Ref: DOC/19/383812

enquires@gplains.vic.gov.au

Dear Mr Waller

GOLDEN PLAINS PLANNING SCHEME AMENDMENT C87 - INVERLEIGH STRUCTURE PLAN

I refer to your letter dated 16 August 2019 seeking submissions in relation to the abovementioned planning scheme amendment.

We understand the amendment is to implement the key land use planning directions of the Inverleigh Structure Plan.

We note that the exhibited Inverleigh Structure Plan 2019 includes the Department of Transport's comments which were provided in our previous response dated 20 September 2018.

In addition to our previous comments, we request the following additions to the structure plan:

- Under developer responsibilities (Page 60 and 61), include the requirement to develop an access management plan, to the satisfaction of the Department of Transport, for ultimate access arrangements to the Hamilton Highway where it abuts Growth Area 1 and Growth Area 4.
- In the Streetscape Masterplan (Page 31), the provision of active transport networks should be considered on the Hamilton Highway east of Common Road, Inverleigh. This section of Hamilton Highway is designated as part of the Principal Bicycle Network (PBN).

We appreciate the opportunity to engage in this process. If you have any questions regarding this letter please contact Mr Nikit Nain (Senior Transport Planner) on 5225 2574 or nikit.nain@ecodev.vic.gov.au.

Yours sincerely

JOZEF VASS Regional Transport Planning Manager Barwon South West Region



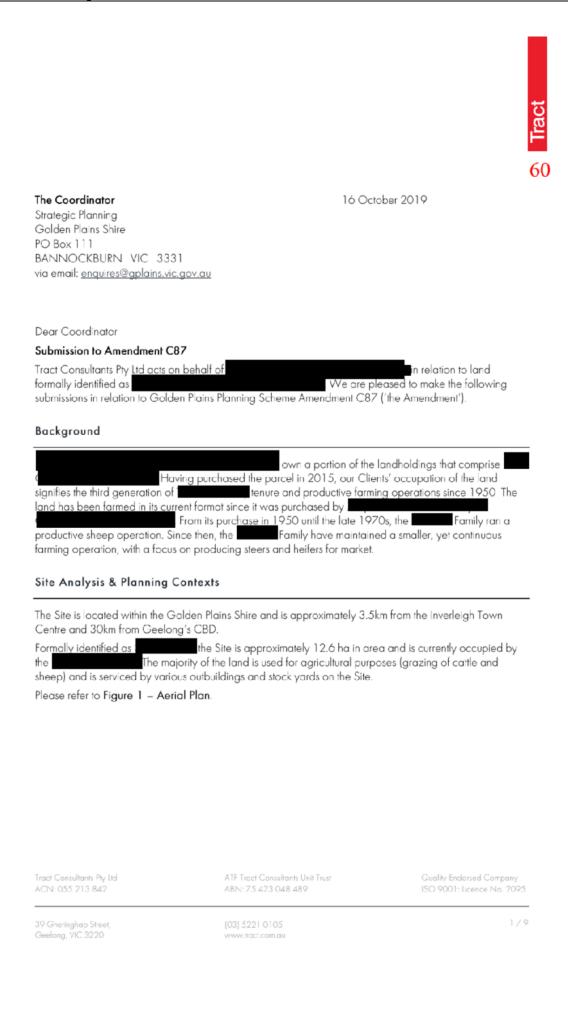


Figure 1: Aerial Plan

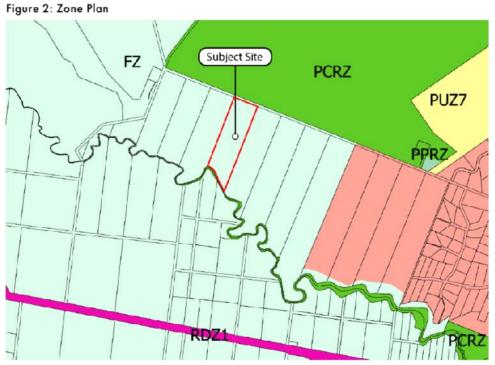


The Site is within the Farming Zone (FZ). This zone encourages the retention of productive agricultural land and to ensure that non-agricultural land uses, particularly dwellings, do not adversely affect the use of land for agriculture.

Please refer to Figure 2 - Zone Plan.

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2019-10-16 Let-GPS_Submission to Amendment C87



The Site is also affected by the following overlays:

- Bushfire Management Overlay (BMO);
- Environmental Significance Overlay Schedule 2 (ESO2);
- Floodway Overlay Schedule 1 (FO1);
- Heritage Overlay Schedule 116 (HO116); and
- Land Subject to Inundation Overlay Schedule 1 (LSIO1).

Significant portions of the Site are also identified as being areas of Aboriginal Cultural Heritage Sensitivity as defined under the *Aboriginal Heritage Regulations 2018.*

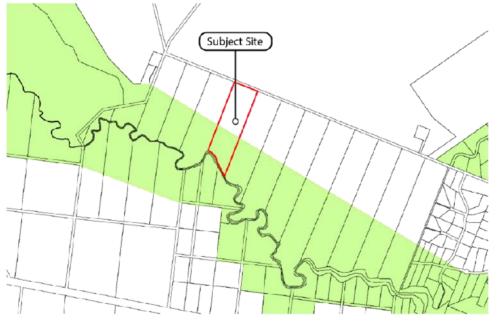
Please refer to Figure 3 - 7 - Overlay Plans Figure 8 - Cultural Heritage Sensitivity Plan.

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Figure 3: Overlay Plan – Bushfire Management Overlay (BMO)

Figure 4: Overlay Plan - Environmental Significance Overlay - Schedule 2 (ESO2)



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2019-10-16 Let-GPS_Submission to Amendment C87

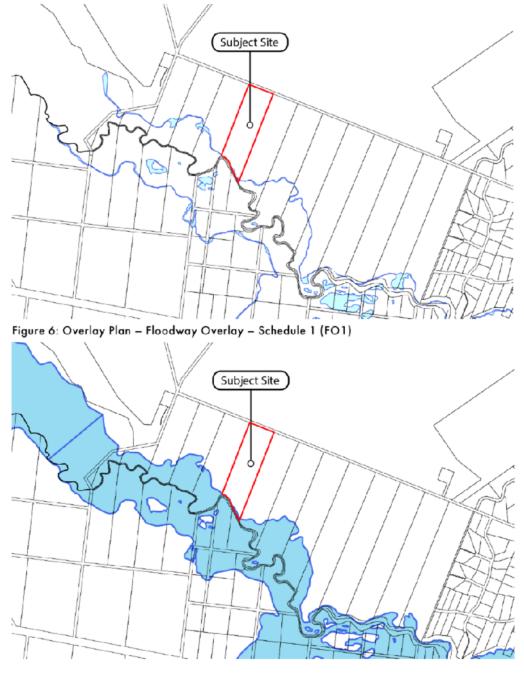
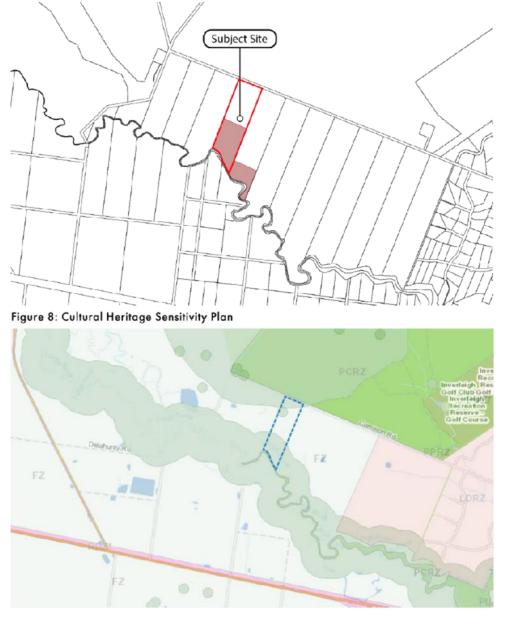


Figure 5: Overlay Plan - Land Subject to Inundation Overlay - Schedule 1 (LSIO1)



2019-10-16 Let-GPS_Submission to Amendment C87





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2019-10-16 Let-GPS_Submission to Amendment CB7

Amendment C87

The Amendment proposes to implement the key land use directions as outlined in the Inverleigh Structure Plan ('the Structure Plan'), adopted by Council in March 2019 We understand the Structure Plan forms part of a routine policy review and is intended to supersede the outdated 'Inverleigh Structure Plan Review 2005'. The Amendment proposes to implement the resultant policy changes into the Golden Plains Planning Scheme by:

- Retaining the town boundary as sufficiently defined in the Inverleigh Structure Plan Review 2005;
- Updating Clause 21.07 (Local Areas Townships) within the Local Planning Policy Framework to reflect key issues, objectives and strategies detailed in the Structure Plan and associated Framework Plan;
- Replacing the Figure 21.07-5A with an updated Inverleigh Framework Plan; and
- Removing stipulated minimum lot sizes (1-2ha) in the Schedule to Clause 32.03 (Low Density Residential Zane), defaulting to the State stipulated minimum of 0.4ha.

Accordingly, the Amendment is directly informed by the adopted Structure Plan which addresses population growth beyond what was forecast in 2005 and associated development pressures. Policy changes included in the Structure Plan that impact the Site are detailed below:

Low Density Residential Zone (LDRZ)

The previous Inverleigh Structure Plan map identifies the Site as within a 'Longer Term Growth Area'. While this map did not assign a minimum subdivision area for the Site, the minimum lot size for any identified growth area was 1.Cha The updated Structure Plan now allows Council to consider lot sizes smaller than 1.Cha if responsive to the established character of the area and is demonstrated viable through a land capability assessment. To this end, the new local policy defaults to the standard minimum lot sizes under the Low Density Residential Zone. This allows for lots of at least 0.4ha where reticulated sewerage is not connected.

Inverleigh Framework Plan

The Inverleigh Framework Plan proposes the future application of the Low Density Residential Zone to the entire Site. Additionally, pedestrian access in the form of a Green Link is proposed to bisect the Site, traversing from north to south in close proximity to the Lullote Homestead. An additional Green Link is proposed across the middle portion of the Site through land that currently provides for grazing

Submissions

We understand Council has previously conducted community consultation that has informed the development of the Structure Plan in its draft stages and do not expect wholesale changes be made at this point in the process.

However, our Clients wish to make the following submissions in the interests of safeguarding their existing land use rights as well as the identified heritage significance and environmental values of the Site:

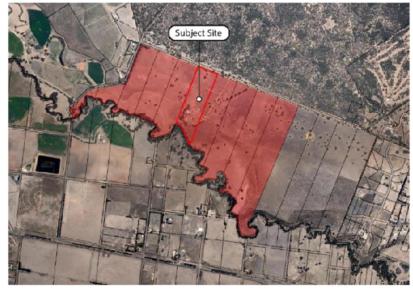
- Within the foreseeable future, our Clients wish to continue farming the land and do not intend to develop in accordance with the Structure Plan. We understand this will limit housing provision and may impact the accommodation of projected population growth in Inverleigh.
- Fragmented ownership of the broader landholdings that comprise 385 Common Road places the identified growth area at risk of ad-hoc and/or isolated development should our Client's land remained undeveloped. In addition to reverse amenity concerns associated with the continued use

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2019-10-16 Let-GPS_Submission to Amendment C87

of the land for agriculture, fragmented development may complicate the coordination of infrastructure delivery and upgrades. Accordingly, we submit that all parcels to the east and west of the Site should not be developed until which time our Clients resolve to develop or sell the land. This is with the exception of the parcels already rezoned to LDRZ. Please refer Figure 9 – Proposed Undeveloped Parcels.

Figure 9: Proposed Undeveloped Parcels



- Land to the south-east of the Site was developed in accordance with the minimum lot sizes
 previously stipulated under the LDRZ. To this end, lot sizes exceed 1.0ha in area. Should the land
 comprising 385 Common Road be rezored, development of 0.4ha may feasibly be permissible.
 This would represent an unorderly mode of development whereby settlement becomes denser with
 increasing distance from the Inverleigh Town Centre at a rural interface.
- In order to control the impact listed above and other desirable built form and subdivisional outcomes, the application of a Design and Development Overlay (DDO) must be applied to ensure the Developer Responsibilities and Strategies identified in the Structure Plan are appropriately realised. We submit a new Schedule be provisioned that articulates requirements beyond the setback provisions of Schedule 5 to allow a logical transition from suburban fabric to semi-rural lifestyle allotments and farmland.
- As identified under the Heritage Overlay Schedule 116 and the Victorian Heritage Database, the Lullote Homestead that occupies the Site is of historical, social and architectural significance to the State of Victoria. This further necessitates the application of a site-responsive DDO Schedule to ensure any encroaching residential development does not detract from the identified heritage values of a 'villa in its landscape' associated with the Lullote Homestead.
- Should the land comprising 385 Common Road be rezoned, and residential development is
 proposed in accordance with the Structure Plan, the following site-specific considerations should be
 properly articulated in a newly created Schedule to the Design and Development Overlay:
 - <u>Sewerage</u> as identified in the Structure Plan, sewerage is not feasible in the foreseeable future with water authorities and the State government showing limited intentions to fund

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2019-10-16 Let-GPS_Submission to Amendment CB7

reticulated sewerage in Inverleigh. In addition to the potential septic seepage on the Leigh River, feasibility of sewerage provision must be appropriately considered;

- <u>Flooding impacts</u> considering flooding impacts upon residents, properties and infrastructure identified by the LSIO, FO and Structure Plan, built form must be appropriately controlled to mitigate risk;
- Protection of environmental values along Leigh River as the Structure Plan and Framework
 Plan supports the development of walking tracks along the Leigh River, patronage to the area
 will naturally significantly increase. Given the significant environmental value of this water
 course identified in the ESO, the protection of biodiversity, landscape and views must be
 detailed;
- <u>Bushfire risks</u> development must appropriately respond to bushfire hazards, as identified in the Bushfire Management Overlay (BMO);
- Appropriate infrastructure upgrades specifically, widening/sealing Common Road, increased pressures on primary school kindergarten; and
- Responsiveness to the heritage values identified under the Heritage Overlay.

We thank Council in advance for the opportunity to review and comment on the Amendment. We would welcome the opportunity to meet with Council to discuss the above <u>submissions as required</u>. Should Council wish to discuss this submission, please contact the undersigned on t

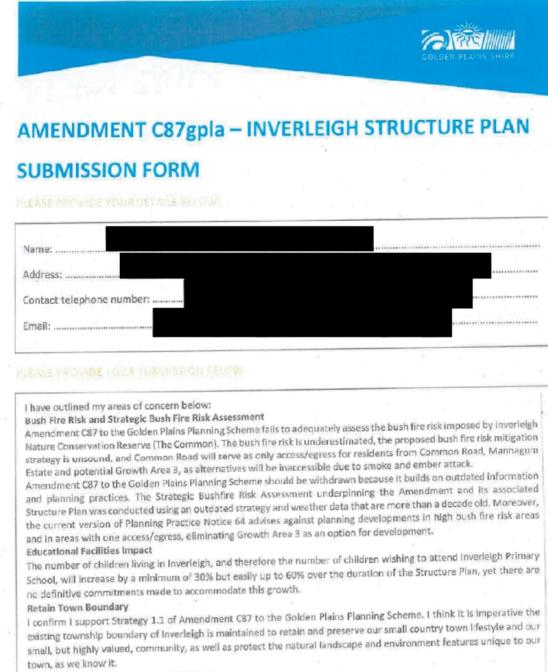
Yours sincerely



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2019-10-16 Let-GPS_Submission to Amendment C87

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Inverteigh 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.

(5220 7111

(a) PO Box 111, Bannockburn VIC 3331

(C) goldenplains.vic.gov.au

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 runoff 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 cutput 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 LDR2 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







Healthy Parks Healthy People^{*}

16 October 2019

Ms Laura Wilks Strategic Planning Team Leader Golden Plains Shire Council 2 Pope Street, PO Box 111 BANNOCKBURN VIC 3331

Dear Ms Wilks

Subject: Submission to Amendment C87gpla – Inverleigh Structure Plan 2019

Thank you for the opportunity to provide input into the amendment process for the Inverleigh Structure Plan 2019 (the Plan). Parks Victoria hope that our submission helps to achieve appropriate planning outcomes for this area.

As illustrated in the Plan, some future development areas have been identified adjacent the Inverleigh Flora Reserve, which is managed by Parks Victoria. The land is reserved under the *Crown Land (Reserves) Act 1978* for the preservation of biodiversity values.

Protection and enhancement of biodiversity values is described as fundamental in the State Government's *Protecting Victoria's Environment – Biodiversity 2037* Plan. At a local level, this approach is supported through the *Golden Plains Environment Strategy 2019-2027*, as well as Clause 21.03 in the local planning policy framework of the Golden Plains Planning Scheme.

Urbanisation and development are considered key risks to biodiversity values, often through the direct removal of native vegetation. However, development adjacent to reserves can also have significant impacts. For example, the disturbance required for new infrastructure facilitate weed establishment, new dwellings create artificial light and noise impacts, inappropriate changes to stormwater flows can affect flora values, as well as increases in vermin activity associated with human habitation.

It is also important to note that developments directly adjacent reserves, often leads to land management issues, as well as risks to biodiversity. In other cases, private land holders have created illegal accesses directly to the reserve, which leads to motorbikes, mountain bikes, dog walking and rubbish within conservation areas. This creates unnecessary risks for individuals (as these areas are not managed for these activities) as well as increased resource implications for Parks Victoria for compliance and enforcement programs.

With these matters in mind, Parks Victoria is specifically interested in how the interfaces will be developed to manage these risks. In similar cases, such as the Greater Geelong Planning Scheme Amendment C368 Planning Permit Application 11/2017 (related to the Lara Structure Plan 2011), a 200 metre buffer was created around the Serendip Sanctuary, through the retention of the Rural Living Zone. Whilst we



acknowledge that this amendment process was different (in terms of the lot sizes being created) we believe that the principle for an appropriate buffer around the reserve should be considered. Special focus on stormwater discharge, in terms of both quality and quantity, into the reserve should also be carefully assessed.

In terms of direct access issues, it is our view that this is best managed through the creation of a public asset (e.g. such as a road) along these interfaces. This is a simple and cost-effective approach to managing the risks to biodiversity and community safety.

Should you require further statutory planning advice on this matter please contact Travis Riches (Statutory Planning Officer – Western Victoria) on tel.

Yours sincerely

District Manager Western Basalt District Office





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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 Plans 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:

 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 then 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.

Yours with regards.



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Amendment C87gpla – Inverleigh Structure Plan Submission

Name:		
Address:		
Ph:		
Email:		

SUMMARY

We are writing this submission as we have a number of concerns about some of the proposed changes outlined in Amendment C87gpla – Inverleigh Structure Plan. Our primary concern is the proposal to change the minimum lot size from 1 hectare to 0.4 hectares. We are strongly opposed to this change on the grounds that it will:

- 1. Increase the fire risk
- 2. Adversely impact the local waterways and water supply
- 3. Change the character and "village" feel of Inverleigh

Submission detail

1. Bush Fire Risk

One of the proposed new developments is in Common Road in an area very close to the Inverleigh Flora and Fauna Reserve (The Common). If the lot sizes in this development were to be as low as 0.4 hectares, this would mean that there would be more residents put at risk in case of a bush fire.

The bush fire risk in all areas of Australia is increasing as a result of climate change. There is currently an increased fuel load on The Common as a result of the DELWP not carrying out fuel reduction burns in recent years and thus not meeting the recommended fuel reduction burn targets. This means that anyone living along Common Road or adjacent streets is at increased risk of being impacted by bush fire.

Common Road is the single access to Hamilton Highway from The Common and thus for the proposed new development. In low visibility due to bush fire smoke, this road would be a dangerous road to be travelling. It is not very wide, there are deep swale drains on the sides and the less people needing to use this road in an emergency, the better.

In a bush fire situation, the prevailing winds will mean the fire will blow towards the Hamilton Highway and the houses between The Common and the highway will be impacted. Again this means that the access along Common Road will be critical for exit. The proposed development would more than double the number of people needing to evacuate from this area which is a recipe for loss of life. Not only will they have to use Common Road, but they will first have to exit the proposed development on to Common Road in an area that is extremely close to The Common – an area of huge bush fire risk. The Strategic Bush Fire 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 development in high bush fire risk areas and in areas with one access/egress, eliminating Growth Area 3 as an option for development.

2. Water pressure

The current water pressure for residents in the area around Common Road is very low especially in summer. A major increase in the population of this area would further reduce the water pressure and the structure plan has no proposal to overcome this issue. This low water pressure is an amenity issue but even more importantly, an additional fire risk issue. The amount/flow of water available to fight a fire from the town water (Barwon Water) would not be sufficient to allow the effective fighting of a fire.

3. Waterways

The proposed development in Common road would be unsewered. As the natural fall of the land in this area is towards the Leigh River, there is a huge risk that septic seepage will occur and contaminate the river and eventually through to the Barwon River. If the lot sizes are reduced to 0.4 hectares, this increases the number of septic systems and increases the risk of septic seepage and amount of seepage. The existing minimum lot size of 1-4 hectares should be maintained in order to reduce the risk.

There is already a problem in the township with effluent run-off from septic systems as noted in the Structure plan review.

4. Local character and amenity

In 2017, a survey was conducted among the Inverleigh Community and results indicated that the majority of the respondents wanted to preserve the small country rural "village" feel and larger lot sizes. This village feel would be severely impacted by a change to the minimum lot sizes.

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Amendment C87gpla – Inverleigh Structure Plan

Submission

President:	Secretary:
Contact Phone No:	
Contact Email:	

Submission Overview

On page 43 of the Inverleigh Structure Plan Draft, the final paragraph states 'There is potential to use the Public Hall on High Street if capacity for services is exceeded on the kindergarten site.'

This submission points out that use of the Hall for future kindergarten services would not be feasible because of the community use of the Hall, the role the Hall plays in Inverleigh community life and the lack of appropriate facilities to meet the requirements of a kindergarten session operating to today's standards and in line with today's regulations.

Support for Early Learning Services at appropriate venues

The Inverleigh Mechanics Institute and Public Hall Committee of Management strongly support essential educational services for pre-school children in Inverleigh, with proper planning between the Shire, Government and Early Learning Centre Committee, those whose responsibility it is to provide the services, timed to meet anticipated demand.

Lack of Consultation

There has been no approach to the Inverleigh Mechanics Institute and Public Hall Committee of Management to establish the range of facilities at the Hall, its suitability for kindergarten services or the impact such an arrangement would have on the role and running of the Hall in Inverleigh. Readers of the draft Structure Plan could have expected that this suggestion had been canvased with the stake holders, validating the suggestion as a real option. Consequently, this submission is responding only to the information presented in the Inverleigh Draft Structure Plan and supporting documents.

Management and Decision Making Regarding the Hall

The Hall is officially known as the Inverleigh Public Hall and Free Library reserve. It is managed by the Inverleigh Mechanics Institute Reserve Committee of Management Incorporated. The Inverleigh Mechanics Institute Reserve Committee of Management Incorporated have been appointed by the Minister for Energy, Environment and Climate Change under section 14(2) of the Crown Land (Reserves) Act 1978.

As the appointed land manager, the Inverleigh Mechanics Institute Reserve Committee of Management have full responsibility over the Inverleigh Public Hall and Free Library Reserve.

Any decisions regarding future uses or development of the reserve need to be approved in writing by both the land manager, Inverleigh Mechanics Institute Reserve Committee of Management incorporated, and the land owner, the Department of Environment, Land, Water and Planning.

(Quoted from a letter provided by Jennifer Bromley, Program Officer, Land and Built Environment, Grampians Region, October 15th 2019, sent to the Inverleigh Mechanics Institute and Public Hall Committee of Management)

Activities at the Hall

The Committee of Management consists of elected volunteers. It maintains and develops the buildings and grounds. It ensures that their use is available to all members of the community for a wide variety of activities and purposes by providing facilities which are open to all members of the community. Examples of typical use are:

- 1. Self-improvement and skill development sessions;
- 2. Cultural experiences;
- 3. Dissemination of information;
- 4. Entertainment for the whole community, as well as for specific groups;
- 5. Meetings special purpose and ongoing groups;
- 6. civic and historic events;
- 7. Social gatherings for people to meet and develop social cohesion; and
- 8. Occasions such as weddings, funerals, birthdays.

The Hall is Well Used

The Hall is well used, with recent bookings showing 32 for August, 29 for September and 28 for October 2019, with the average for bookings being 15 per month. There is considerable co-use of this facility, by groups whose bookings do not preclude use by others. Increased population will lead to increased use of the Hall, with activities where one session is currently enough, requiring additional sessions and more interests and activities being supported.

The Hall Plays a Vital Role in the Social Welfare of Inverleigh and District

The Hall has historically played an important role in creating a sense of community and place, in bringing together old timers and new-comers, young and old, as well as people with different allegiances and interests. It continues to have an important role in providing for social cohesion and social welfare in our small town, which has few public facilities. Play Group, the Senior Citizens group and the Historical Society, all of whom have their headquarters at the Hall, many local groups use it for meetings and there is a wide range of occasional users.

Kindergarten Services at the Hall would detract from the Hall's Role in the Community

Denying wide ranging general community access to the Hall by using it for kindergarten services would impact negatively on users of the hall as there would be time and facility use constraints. There would be fewer opportunities for community members to make use of the Hall.

Converting the facilities to suit the needs of kindergarten services with child sized facilities, safety visual supervision lines and large storage, along with meeting the current Health and Education Department regulations, would require the loss of the Hall's amenity to other users. It would also be very expensive.

<u>Problems experienced with the Pre-School operating at the Hall in the late 1970s and early 1980s</u>

The Pre-School, which was the pre-curser of the Kindergarten, did operate at the hall in the late 1970s and early 1980s. **Considerable difficulties were experienced in providing the educational program with the need to pack away all equipment, to supervise children at the toilet and to leave the Hall in clean condition for other users. Use of the Hall was curtailed for others.** At a time of no pre-school services in the town, it was a makeshift situation while a purpose-built facility was made. The requirements of the era were not the same nor as exacting as those of today. It was a great moment for all when the original purpose-built Pre-School building was opened.

More Demand for Kindergarten Services Now and in the Future

While our submission regards the Hall in particular, consideration of the suggestion of kinder services there led to some thoughts about kindergarten services in Inverleigh. It is noted that The Victorian government has announced that it is rolling out funded three-year-old kindergarten sessions which will be available in some areas in 2020 and across the state by 2022. Golden Plains Shire has not been included in the first two years of the roll out, and the Education Department website states that as only those with the physical capacity currently were selected. Three- year-old sessions are provided now but are not mentioned in the description of services on page 43 of the Inverleigh Structure Plan Draft. The increased services to meet population growth at any level, along with 15 hours per week of three-year-old funded sessions, needs to be addressed immediately, with plans that provide for quality early learning in a purpose-built venue for the children of our community.

Summary

The Hall is not appropriate for use for overflow kindergarten sessions because:

- Inverleigh Public Hall has an important role in the community to build connectedness and to provide a shared public facility. This role will increase with population growth.
- Time for sessions and planning and preparation for kindergarten services would curtail time available to other users of the Hall.
- The Hall facilities are not suited to the current requirements and regulations of kindergarten services. Alterations would be costly and affect the amenity and variety of other Hall users.
- The Responsibility for ensuring quality early learning experiences for the children of Inverleigh rests with the Golden Plains Shire, the Government and the Early Learning Centre Committee.

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10/10/19

To the Golden Plains Shire Council PO Box 111 Bannockburn, Vic 3350

Re: Amendment C87gpla – Inverleigh Structure Plan Submission Form. Eliza Peel.

Thank you for the opportunity to make this submission about some issues I feel are important to the town of Inverleigh. These ideas come after marrying a 5th generation Inverleigh farmer, and moving to Inverleigh in 2013. I am currently working locally as a physiotherapist, and involved in various community groups; Inverleigh Progress Association, Inverleigh Tennis Club, Inverleigh CWA, Inverleigh Town Hall Committee, Barrabool Hills Landcare group, Otway Agroforestry Network, various rural women's networks, local primary healthcare, local kindergarten, Inverleigh Playgroup, local beekeeping and gardening groups. This town and district is very special, and I feel a duty to look after it for future generations.

My areas of concern are outlined below regarding Inverleigh Structure Plan Amendment C87gpla:

- 1) Extreme fire threat in The Common (Inverleigh Nature Conservation Reserve)
- 2) Educational facilities impact
- 3) Retain town boundaries
- 4) Impact on The Common
- 5) Minimum Lot size in Inverleigh
- 6) Unsewered blocks
- 7) Sustainable development relating to town water supply
- 8) Poor road infrastructure current and future:
- 9) Summary

1) No more development near the extreme fire threat in The Common:

'It is not a matter of 'if', but 'when' a bushfire occurs in The Inverleigh Common". This is a frequent statement parroted around very experienced Inverleigh CFA members; those among them my husband Ewen Peel, (current secretary, with over 35yrs active membership), and my father in law, Ross Peel, who has been an active Inverleigh farmer/volunteer firefighter since the 1950s. It is commonly known that this region is in the top few fire risk areas in the world.

Amendment C87 grossly underestimates the bushfire risk, its mitigation strategy is unsound, and the data used for assessment is using an outdated strategy, with greater than 10 years old weather data. It makes sense not to develop high fire risk areas (as advised in Planning Practice Notice 64); So Growth Area 3 should not be developed.

In the event of a bushfire, Common Road will be grossly inadequate for traffic from/to Common Road residents, Mannagum Estate residents, and potential Growth Area 3 residents. I would not feel safe living there currently, and more so with more growth. The most likely scenario is a fire starting in Teesdale, coming through The Common, smoke blowing across Inverleigh estates, with panicked residents driving out with only one inadequate, overloaded, narrow road out to safety. (Common Road).

2) Educational Facilities Impact:

There are no definitive commitments in the Structure Plan made to accommodate future growth projections of children wishing to attend Inverleigh Primary School.

There has been no communication to date by the Council with the Inverleigh Hall Committee (of which I am a member) regarding 'potential to use the ...Hall...if capacity for service is exceeded on the kindergarten site (Page 43, final paragraph of Structure Plan). It is not appropriate that a local hall should take up flack to help overcome bad education department/council planning.

If the population grows such that more kindergarten/school resource is required, this infrastructure should be included in the original planning, with a new purpose built kindergarten, or adequate extensions to our current purpose built kindergarten. This is just one example of many, of the major concerns of the community of Inverleigh – that council allows new houses to be built without addressing increasing need for services and facilities such as kindergarten/schools. Developers should be made to contribute more to this infrastructure.

3) Retain Town Boundaries:

Personally, I don't want Inverleigh growing its population and area any more than is mandatory. My understanding is that is no population growth has been mandated. Alongside other Inverleigh residents, I wish to protect our small country town lifestyle, community and rural surrounds by allowing no housing expansion beyond current boundaries.

4) Impact on The Common (Inverleigh Nature Conservation Reserve)

Amendment C87 fails to protect The Common. There is potential impact on rezoning The Common. The Amendment C87 doesn't address the anomaly of the northern part of The Common which is currently being looked after by Parks Vic, but is zoned as farmland. To safeguard this northern section, it should be rezoned as Public Conservation and Resource Zone; and align it with the rest of The Common.

The Amendment C87 doesn't address potential harm to endangered flora and biodiversity in The Common, which is increased due to urbanisation's increased recreational use (such as motorbike riding), domestic cats, feral foxes, and increased fire risk in The Common, with significantly increased population to Inverleigh.

5) Minimum Lot size in Inverleigh:

I believe that the current minimum 1Ha Lot sizes zoned in Inverleigh should remain, to manage potential waste water impacts and a slow, consistent and sustainable growth in Inverleigh.

I believe lot sizes of 0.4Ha (1 acre) are too small for Inverleigh. Diversity in block sizes is essential to allow people a country lifestyle choice, as this 'more space' is often what motivates them to move from urban locations. It is this space that makes Inverleigh attractive and unique. Please help us preserve it, by not allowing 0.4Ha minimum blocks! While 0.4Ha blocks have been standardized across the state, that doesn't mean we should default to that too – Perhaps the current residents should be consulted and their wishes considered.

6) Unsewered blocks:

I support Inverteigh continuing to have unsewered blocks. The minimum block size should reflect (depending on soil type) an adequate size to handle a modern septic system, without impacting on neighbours, waterways or nature.

7) Sustainable development relating to Town Water Supply:

I do not support the Amendment C87 due to inadequate town water supply planning. Proposed future growth levels in Amendment C87 will exceed the capabilities of Inverleigh's already stretched town water supply. The current water supply is inadequate; especially on hot days with significantly reduced water pressure around Inverleigh; (especially residents on higher ground). This scarcity will be even more critical, given that more houses are predicted to be built nearby the high fire risk Common. Barwon Water is already stretched, which will be worsened with climate change and future predicted population growth in the Geelong and Bellarine region.

8) Poor road infrastructure - current and future:

Amendment C87 fails to provide safe and adequate infrastructure to be planned and developed alongside new dwellings; such as sealed roads, walking paths, stormwater drains, etc. This is not currently being done, or planned to be done, in accordance with minimum standards.

Common Road and Twins Bridges (Teesdale Road) is currently not adequate for traffic flow, let alone future growth, or in the event of bushfire in The Common.

Hopes Plain Road needs to be sealed and made an alternative.

The current stormwater drains around Common Road are dangerous, unsightly and inadequate (see my letter to the CEO 10/10/19). These essential roads have not been adequately considered in the Amendment C87.

9) Summary

I do not support many aspects of this Amendment C87 as it fails to address many of Inverleigh residents' needs.

Before the Council endorses this structure plan, it is imperative they address these issues. Many people of Inverleigh have spent massive amounts of voluntary time on this (The Inverleigh Action Group, Inverleigh Progress Association, other groups and individuals, to name a few).

Please listen to them (and subsequently act) to regain the community's trust and confidence (eg Golden Plain's poor performance in 2019 state-wide local government survey).

Again, thank you for the opportunity to make this submission, and hope it (and others) truly be heard. Feel free to contact me should you require additional information.

Yours Sincerely:

Electronically Signed.



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The proposed Golden Plains Shire Draft Inverleigh Structure Plan (Planning Scheme Amendments) shows potential to place our community and lifestyle under risk.

NOW is the opportunity for the community to be heard on what we want for the future of our quaint and rustic character country town, what we know as "Inverleigh".

Our community should take the opportunity to lodge submissions, as individuals, with Golden Plains Shire, voicing any concerns of the Structure Plan as it currently stands and its potential future impacts on our community.

To access the plan you can view a printed copy which is located at the Inverleigh General Store or you can go online to the Golden Plains website. www.goldenplains.vic.gov.au/residents/my-home/planning/ strategic-planning

The Inverleigh Post Office have received the Golden Plains Shire's mail out to residents regarding the Structure Plan which enclosed information, a submission form and reply paid envelope but unfortunately have not addressed a large quantity of them correctly, effectively making them undeliverable. If you have not yet received this correspondence, please advise the Inverleigh Post Office or contact the Golden Plains Shire requesting one.

The State Planning policy for Council is to provide a 15 year land supply and this should be provided across the whole municipality.

The identified areas of concerns are the following:

- In 2017 the Inverleigh community was surveyed and the results of that survey indicated overwhelmingly the desire for the preservation of our small country "village" lifestyle, an alternative to the nearby towns of Bannockburn, Winchelsea and Geelong. These results are not reflected in the Draft Structure Plan.
- Increased risk to life due to increased traffic along Common Road and therefore the intersection at the Hamilton Hwy
- Increased risk to life from the potential of fire occurring in the Inverleigh Common/Flora & Fauna Reserve
- One road in and one road out access and evacuation route from new development areas
- Major infrastructure concerns related to:
 - Educational and childcare facilities
 - Sporting facilities
 - Roads
 - Water supply/pressure
- Major environmental concerns related to:
 - Wildlife habitat and lives
 - Rare orchid species
 - Potential leeching of septic run-off to the Leigh River (and through to Barwon River)
- By-Laws have been created which have effectively gagged the community from questioning Council regarding residential development.

The voice of the Inverteigh community as a whole must be heard by making submissions regarding the Structure Plan. To help raise awareness of the concerns the community hold there will be templates

ALREADY THE PHRASE OF URBAN LIVING MEANING CIT

COUNTR