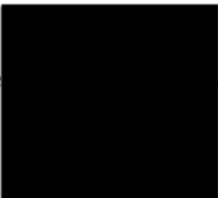




A large rectangular area containing horizontal dotted lines, intended for handwritten notes or a signature.

**\*Please attach additional pages as necessary**

Signature  Date 13/10/2019



## AMENDMENT C87gpla – INVERLEIGH STRUCTURE PLAN SUBMISSION FORM

Name: [REDACTED]  
 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**  
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**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.

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**Unsewered lots**  
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 I am opposed to elements of Amendment C37 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.

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\*Please attach additional pages as necessary

Signature [Redacted] to 16/10/19



79

# 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:

*pages attached*



[REDACTED]

Inverleigh Structure Plan - Amendment C87gpla

October 2018

I am writing to express my concerns with Golden Plains Shire, planning scheme amendment C87gpla.

Whilst supporting the limiting of the town boundary I do not believe this protects the uniqueness of the township and surrounds of Inverleigh. It is this uniqueness that new residents say attracts them to the area and Inverleigh in particular, not the urban visual of Bannockburn.

I do not believe the GPS has any understanding or sympathy of this uniqueness and the desire of the locals to preserve the open, country feel of this town. As in the 2005 plan, there needs to be larger blocks on the perimeter of the township zone so the farming and residential zones merge together, not a hard line. The proposed blocks are too small.

We are a rural service town. This was very evident in the failed Streetscape Masterplan exercise of which you were warned. Inappropriately it still appears in the Structure Plan. Please do not destroy this town by re-implementing that plan.


The Inverleigh Framework Plan has errors some examples are:

1. A level crossing where no level crossing exists
2. A no through road exiting via a railway reserve
3. No Federation Bridge or tracks.
4. Green links along roadways that hold a State Government 99 year lease
5. Future pedestrian paths where the council has already constructed paths.
6. West side of "The Common" not included on any maps as part of the Reserve.
7. West of the Teesdale Road to Bakers Lane has always been part of the Common. To be told "we are talking to the State Government about that" is no proper answer.
8. The Heritage Map of Inverleigh states "Public Hall and former Mechanics Institute" when the correct title is Inverleigh Mechanics Institute and Public Hall. In fact in 2016 received the plaque from the Mechanics Institute organization acknowledging 150 years of service to the Inverleigh community.

The answer I received at the August council meeting regarding the Structure Plan mail out and errors on the map showed the GPS did not understand their own processes. Someone at the Post Office spent hours of their own time trying to match addresses to people (The Occupier). What a failure of process. This was the week before the rate notices arrived with helpful addresses.

The suggestion that the school expand to the school woodlot on the south side of the highway and railway line makes no sense. For over 20 years the shire has been unable or unwilling to re-locate the tennis courts to the sporting Complex to allow the school to expand to the west. "There is no funding for tennis courts" is no excuse for this failure to deliver, you had 20 years to plan and budget for this to happen. To be relying on 5.11 developer contributions is just showing lack of planning by the shire. Plans must be in place for school provisions before the influx of new houses.

**Further strategic work** - an investigation of access from the north to south. This is high priority if you are considering the safety of these new developments. The developers will not care like we care for our own.





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Name: ..... [REDACTED]

Address: ..... [REDACTED]

Contact telephone number: ..... [REDACTED]

Email: ..... [REDACTED]

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\*Please attach additional pages as necessary

Signature  Date 11-10-2019

☎ 5220 7111

📮 PO Box 111, Bannockburn VIC 3331

🌐 goldenplains.vic.gov.au

✉ enquiries@gpplains.vic.gov.au



## 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:

*see attached sheets*



Amendment C87gpla

Inverleigh Structure Plan

Submission 16 October 2019

I am a full time resident of Inverleigh of 45 years. The people of the town were very good to me in 1979 when I struggled after a loss of my home by fire. I have volunteered on numerous committees and supported local activities and groups as my way of giving back. This is my submission to the Structure Plan, a plan for Inverleigh after I have declined to mumbering status and then reside in the Inverleigh Cemetery (I have purchased my block before a developer gets his/her hands on the site). I still want the best for my town and thus wish to state that this structure plan is not good enough - Inverleigh is a better community than you are giving it credit, and the lowest common denominator development without infrastructure for vehicles, school, open rural aspect, water, safety and community facilities rates low in the plans priorities. I commented in writing on errors in the Structure and Streetscape plans in July 2018 but after the recent Streetscape Masterplan failure it is imperative the shire listens to the community concerns. I know several supporters of the plan who plan to subdivide because of the windfall profits they are anticipating.

The group investigating the shortfalls in the Structure Plan have encouraged me not to be emotive, but I am emotional, it is my home and the safe space where I reared my children. The population increase resulting from this plan will create a less liveable place. We are unique and envied, minimum requirements for closer settlement will not enhance our liveability.

### Map

I am a visual person and cannot stand a map being incorrect. The map prepared by Mesh for this project is flawed and I thank the council officers who visited and looked at the major errors. I cannot agree with them that the map is just a representation for viewing, and the corrections will be made at a later date. Bunkum. Maps contracted by GPS should be accurate.

1. A lovely picture of Federation (Suspension) Bridge graces the proposal, unfortunately the bridge and associated path to the Lookout and access to Savage drive is missing. This bridge built in 2001 replaced the logs (Savages Log, Kennedys Log, and Aldersons Log) that the townspeople used for over 100 years. The bridge is due for replacement in 2026 and the Golden Plains shire will need to allocate future funding. This bridge and track is used for children to safely get to school, the health aspects of the associated walks, access for residents to the commercial centre without using a car.
2. "No more railway crossings are envisaged" Lucky the map includes one that does not currently exist.
3. The Gallagher Road extn was closed after a suicide attempt at the crossing. Still listed on map.
4. Peel Road named but not drawn on map.

1

5. Police Station and Fire Brigade are not listed as community assets, and not listed at all.
6. Inverleigh Flora and Fauna reserve only partially included. Is 'The Bush' to be sold off by the shire?
7. The proposed footpath on Mercer Street in the old township is already installed.
8. The Sporting Complex green area is inaccurate.
9. Inverleigh Station, currently mooted as a stopping place for the Southern Rail tourist stopover, does not have a Park Street extension.
10. Road names; Falkirk, Kinross, Casuake, Church, Campbell and Weatherboard are missing. Rawson is incorrectly named.

### Developers/Development

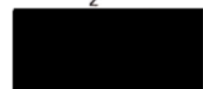
Inverleigh has always been of interest to developers. At the first township land sale in 1864 a prominent Geelong auctioneer and speculator A.C. MacDonald purchased blocks. Opportunities to create profit have always existed. In the 1970's it was advertised to "meet the owner in a blue Valiant" who had purchased lots of small titles to the west of the town, which on the Structure Plan are called "Future Investigation Area" The only spot that still has no water supply, so green areas to the west for fire mitigation are impossible.

Since then there has been six or seven groups of development. Some by local residents are well planned and beautiful places to live, others opportunist land handed over 'big' developers that have narrow roads, poorer outlooks and feel second-rate.

I have looked at the one acre developments in Bannockburn and Teesdale and their liveability is questionable for Inverleigh. A lot the other households who are on larger blocks will have no restrictions on cutting off smaller blocks and so it doubles or trebles the potential home sites. With this one decision you will increase the value of a 'blockie' by 50%, increased rates for the council. I have one friend who has lived on her block for over 20 years and her rates are now over 10% of her pension making maintenance and improvements very difficult. We do not want to make a structure plan that results in residents being forced to move further out.

If the school has to expand then the developers have to pay. The shire should purchase the 'Vicars Paddock' from the Anglican Church using developer funds and keep the land for school expansion as they are adjacent. No rubbish about putting a school campus on the railway line.

All councils have to provide 3 year kinder, annex the unused land near the kinder for future use. Start charging the developers for proper infrastructure rather than airy-fairy "green links" which the shire cannot maintain and will not provide funding for planting suitable habitat.



## Roads

Hamilton Highway has changes in nature since the Ring Road at Fyansford. With the traffic lights all cars and trucks now come in bunches, at the speed of the first vehicle. With the increased traffic the opportunity to pass slow moving cars is rare and the traffic is west-east as well. There are no designated passing lanes and with the added traffic using Burnside Road the travel time from Fyansford to Inverleigh has expanded by 10 minutes. The structure plan has no positive requirements to cater for increased traffic.

The formed roads, nature strips and footpaths in the Bannockburn & Teesdale recent developments have very narrow roads

## Ambience

It is lovely that outsiders think that Inverleigh is a wonderful place to live.

However it is difficult if;

- you only have one car in a family, (the average is 4)
- your children are involved in after school activities at secondary school, (house sales start about second year of travel)
- there are no postal deliveries, (good - we all chat at the store)
- the business centre and part of the old town floods
- you expect that the volunteer fire fighters will save you from fires from the west
- driving into the sun morning and night on the Hamilton Highway to work
- water pressure drops in summer (end of line from Teesdale)
- tv reception is dodgy each early evening
- power blackouts are frequent (Colac grid)

and none of these things are addressed in the structure plan.

My submission is that this Structure Plan is not good enough, site specific or unique., and it can be if the Golden Plains staff aim higher than mediocre and the minimum standards set by the government.

3



Since the streetscape fiasco, I take notice of every country town I pass through both Victoria and New South Wales. Towns can have their own signature street furniture like Rutherglen. They struggle with tourism excesses like Lorne. They can be divided by poor planning like Winchelsea.

I approve of the defining of the town of Inverleigh boundaries, but fear that Murgheboluc will be cut up smaller and smaller blocks. Keep green wedges between here and Geelong. Vary the sizes of blocks and limit the number of subdivisions of existing blocks to one, even though battle-axe blocks look terrible. Make the roads so that parking is possible and squeezing past a utility doesn't involve a intake of breath. Fix the developments drainage. Encourage fire buffers.

Keep Inverleigh great.







## AMENDMENT C87gpla – INVERLEIGH STRUCTURE PLAN SUBMISSION FORM

PLEASE PRINT YOUR DETAILS IN BLOCK CAPITALS

Name: .....  
 Address: .....  
 Contact telephone number: .....  
 Email: .....

PLEASE PROVIDE YOUR DISSENTING OPINION

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**Diversity of lot size**

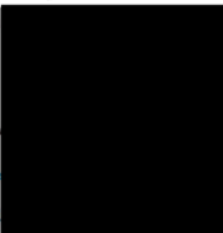
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\*Please advise if any further information is necessary

Signature



Date

13/10/19

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Ennockburn VIC 3331

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## Submission to Amendment C87

To: Planning Department  
Golden Plains Shire

Thank you for the opportunity to make a submission to Amendment C87.

I wish to raise the issue of the linkages between the Inverleigh Reserve to the Leigh River and protections for the river itself.

It is my position that the proposed changes strip environmental objectives and strategies from the current amendment many of which are not adequately, if at all, taken up within the revised Inverleigh Structure Plan. At first reading these changes appear to notably favour developers over the responsibility of the Golden Plains Shire to properly protect and preserve our natural assets. This is at a time when the threats facing those assets require a greater level of stewardship not less.

As a long term resident of the Shire I have been an advocate for the protection of its natural features. I have sat on a recent steering group overseeing flow studies conducted by the Corangamite Catchment Management Authority into the Leigh and Barwon Rivers along with an earlier one for the Moorabool River. I am also a member of the Barwon Water Environmental Advisory Committee and an interim committee member for the Friends of The Barwon. The views expressed in this submission are my own and are not to be attributed to others.

It is quite evident that in the 15 years since the current Inverleigh Structure Plan was adopted the issues facing our broader environment have increased markedly. The latest *Long-term Water Resource Assessment for Southern Victoria (page 49)* shows a decline in surface water availability of 11% in the Barwon Basin which includes the Leigh River over the last 15 years. This trend is likely to continue with predictions that, in 2050, the region could have twice the current population and possibly half the traditional sources of water for our towns, industries, farms, and environment." *Our Living Rivers of the Barwon – Barwon River Ministerial Advisory Committee Discussion Paper (Page v)*.

As an example one of our iconic species the koala is already proving to be heavily impacted with huge population declines in Queensland and NSW along with notable declines in Victoria. They are "particularly vulnerable to the effects of climate change, suffering heat stress, and because the tree species they rely on are affected by altered temperature and rainfall". Leaf water "is normally sufficient to meet koalas' moisture requirements" but "during periods of extreme and prolonged high temperatures and dry conditions, leaf water content may not be enough to meet water needs of koalas." *Needing a*

*drink: Rainfall and temperature drive the use of free water by a threatened arboreal folivore 2019  
Valentina S. A. Mella, Clare McArthur, Mark B. Krockenberger, Robert Frend, Mathew S. Crowther*

Researchers in the You Yangs are also attributing the population declines in their area to moisture stress in trees. Mel King has been a long term koala researcher there. See "*Chapter 6: Mel King's Story (The Younger Generation) - 5.30 minutes*" <http://www.djillong.net.au/our-stories-videos.html>.

Ms King relates that the three main challenges facing koalas currently are climate change, development and mining and sees access to rivers as being vital in population resilience. "Our river systems are so important. The soil there is better. The roots will be able to get more moisture to the koalas. Our river systems need to be restored. I can't say it enough."

This development flagged for this area effectively excises wildlife access from the Inverleigh Reserve to the Leigh River. It is vital that measures, backed by robust objectives and strategies, remain in place and are enhanced to meet the challenges imposed by development in this area.

If taken, this process presents opportunities which include an enhanced and extended river reserve and well as a potentially more robust linkage between it and the Inverleigh Reserve.

### Lot sizes

It is self evident that the higher the density of lots in the corridor between the reserve and the river the greater the impact on both, whether it be in regard to potential cumulative septic runoff, pressure on the nature reserve from uncontrolled pets and the restriction on wildlife movement between the two environmentally significant areas increases as densities increase.

It is clear that in the judgement of the planning panel who dealt with the recent Golden Plains Planning scheme Amendment C74 230 Hopes Plains Road, Inverleigh "The current minimum lots sizes under the Low Density residential Zone (LDRZ) of 1 to 2 hectares (2.5 to 5 acres) allows the site to be developed in a manner that reflects the character and amenity of Inverleigh."

It is also clear that developers can and often do take a different perspective. From the Ordinary Council Meeting Agenda 26 March 2019 Item 6.3 Page 9:

*"The current Inverleigh Structure Plan is included in the schedule to the LDRZ and requires the land to be developed with 1 hectare lots, or where the land adjoins the Inverleigh Flora and Fauna reserve and Inverleigh Golf Course 2 hectare lots. It is anticipated the developer will only apply for a planning permit to subdivide the land if and when the minimum lot size is removed as a result of the new Inverleigh Structure Plan."*

[https://www.goldenplains.vic.gov.au/sites/default/files/Council%20Agenda20260319\\_pg1\\_62\\_0.pdf](https://www.goldenplains.vic.gov.au/sites/default/files/Council%20Agenda20260319_pg1_62_0.pdf)

The Rural Residential Development - Planning Practice Note | 37 JUNE 2015 states;

*"The Low Density Residential Zone (LDRZ) is a 'residential' zone. It specifies a lot size of at least 0.4 hectares in areas where reticulated sewerage is not connected or 0.2 hectares for each lot connected to reticulated sewerage. A different lot size can be specified in a schedule to the zone."* (Page 1)

And

*"It is important to demonstrate that the proposed rural residential development meets the housing needs of the municipality and takes into account the need to maintain housing choice and diversity including a realistic mix of lot sizes."* (Page 4)

A second consideration is risk of effluent runoff making its way into the Leigh and Barwon Rivers. Having 500 unsewered lots feeding drainage lines toward the river has the potential to impact those rivers particularly in times of extended wet weather. The EPA does not directly discuss the culmination of nutrient loads moving across landscapes but there are some strong suggestions within their guidelines.

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

Table 5 details the buffer for "Wastewater up-slope of potable supply channel 300" metres while "Wastewater field down-slope of potable supply channel 20" metres. The Leigh River is not a potable supply channel however these guideline do highlight the expectation that up-slope sources do extend the buffer zones by a factor of 15.

I submit that 0.4 hectares lot sizes under the LDRZ should correctly regarded as a minimum size not the default size. That given the location and the impact of development on the land between the river and the reserve lot sizes of 1 to 2 hectares be retained and specified within a schedule to the zone.

### Bio-linkages

*"A green bio-link is proposed to ensure a safe passage for wildlife between the Flora and Fauna Reserve and both the Leigh and Barwon Rivers. It is recommended that parts of this green link also incorporate public walking tracks to increase pedestrian linkages within the town."*



*Inverleigh Structure Plan Review • Prepared for Golden Plains Shire by Connell Wagner Pty Ltd  
• March 2005 (Page 24)*

The importance of Bio-links have been accentuated because of climate change. Biolinks Alliance is a Victorian organisation dedicated to inclusive, large-scale conservation. It is a well regarded source of information on the topic with regular symposiums. <https://biolinksalliance.org.au/>

*“Under climate change, environments are becoming more stressful. But human activities are adding to these stresses, for example as farming practices change. Together these drivers are leading to reduced genetic variation.”*

*“We can use evolutionary adaptation to make significant gains in dealing with climate change. There is genetic resilience in the system. But this requires connectiveness between populations. High genetic diversity means that species are more likely to survive, both in the laboratory and in the natural environment.”*

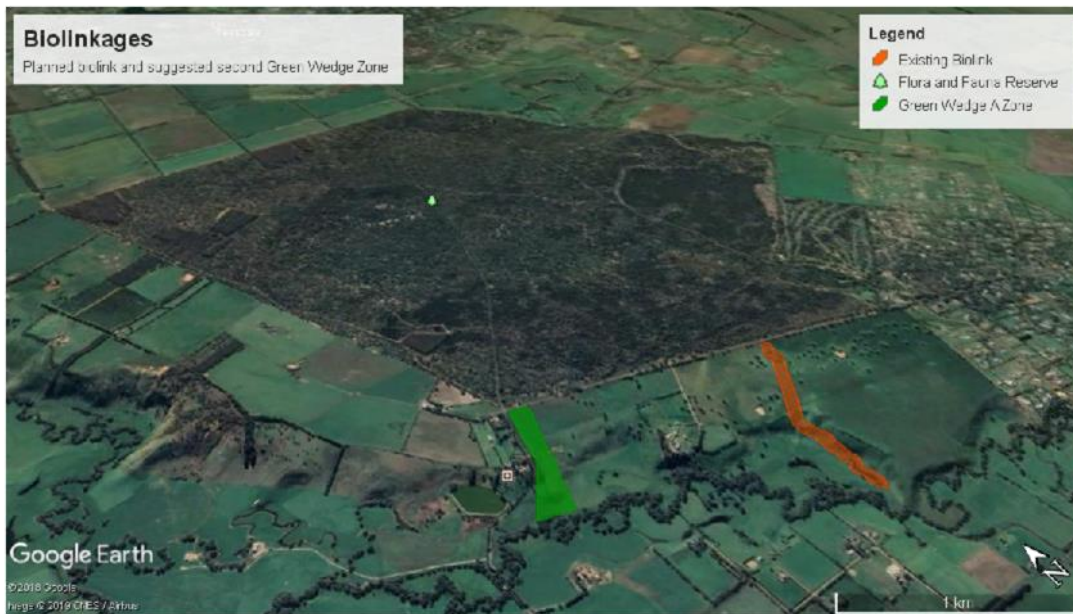
*Symposium Presentation No. 2 Climate proofing – genetic diversity, species diversity and evolutionary processes Professor Ary Hoffman and Rebecca Jordan BioSciences and Bio21 Institute, University of Melbourne.*

The current proposal for a 60 metre wide corridor connecting the reserve with the river has merit as a green pathway, incorporating part of an existing anabranch of the Leigh River as well as some remnant trees, and as such should be retained. However it is being asked to accommodate not only wildlife but also walkers, riders, and vehicle access as well as being regularly mowed. It is also placed where the distance between the two zones is at its widest. As a result its effectiveness as a linkage corridor “ensuring safe passage for wildlife” is diminished.

What needs to be part of this amendment is a second, truly dedicated Biolink. One that permits not only passage to standing water sources for species like the koala but also allow for the development of a broad range of genetic linkages including plant, reptile and insect.

As such a dedicated biolink of at least 150 metres could be considered for the western edge of the Common Road development along the Teesdale-Inverleigh Road. It would have the advantage of being positioned where the reserve is closest to the Leigh River, incorporate an existing large stand of trees, provide a vegetated buffer zone to clearly delineate between the town boundary and agricultural land as per the requirements under the existing ISP, and be positioned at a natural focal point of both the Reserve and the vegetated crown land to its west.





I have little planning expertise but am wondering if a Green Wedge A Zone for this biolink might be an option.

*“The Green Wedge A Zone (GWAZ) is a ‘rural’ zone. It provides for lot sizes of 8 hectares and above. It applies to non-urban land outside the Urban Growth Boundary to protect and recognise the area’s agricultural, environmental, historic, landscape, infrastructure, natural resource and rural living attributes.”*

*The Rural Residential Development - Planning Practice Note | 37 JUNE 2015 (Page 11)*

### Steamside Reserve

#### River frontage Master Plan

*“A master plan should be prepared for the Leigh River and Barwon River to ensure these important riverine environments are appropriately managed. Special attention should be paid to controlling vehicular access, management of weeds and erosion, and reinstatement of riparian environments.”*

*Inverleigh Structure Plan Review • Prepared for Golden Plains Shire by Connell Wagner Pty Ltd  
• March 2005 (Page 34)*

It is my understanding that this was never undertaken. It needs to be an enforceable priority for Council as part of the amendment changes. Without such a plan the Council finds itself in the position of making long term decisions on an environmentally significant area of the Shire without due consideration of this iconic area.

Riverine environments are an important bio-reserves and once put into public open space and added to the existing zone, the area between the development and the river has the potential to be one of the most significant, natural, river reserves in the Shire if not the whole basin. This is an opportunity that deserves the full attention of Council to get right.

### Boundary Changes

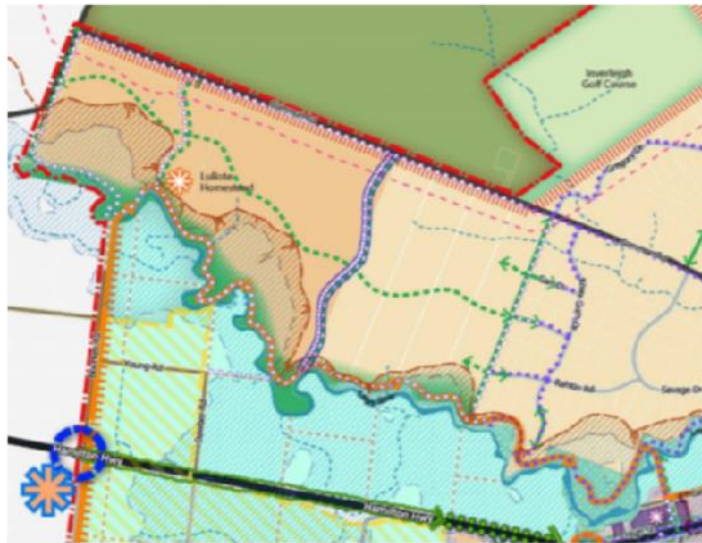
The boundary on the existing map clearly delineates the extent of the Common Road LDRZ and shows it constrained to the escarpment.



Existing boundaries.

The new map displayed in the Amendment seems to show new boundaries, substantially increasing the size of the area for development and extending well down into the sloped areas toward the river. The legend only seems to indicate the red dashed line as the escarpment extent rather than the extent of the development.

If this is indeed the case then it is of deep concern.



Boundaries not clearly delineated

The map in Attachment B to the ISP seems to confirm this.



Map -Attachment B ISP

If indeed lots are proposed to extend into these new areas off the escarpment on to the slopes toward the river then issues of visual amenity, proximity to floodplains, potential for effluent/nutrient transfer become notably more acute. Regard needs to be given to any available environmental assessments of the area which have obviously discouraged past the ridgeline. Development between the ridge and the river should not be permitted and the original boundaries should be honoured and reinforced within the amendment.

### Other Track Changes Document Differences

As stated earlier the changes detailed within this document appear to strongly favour the needs of developers over the responsibility of the Golden Plains Shire to properly protect and preserve our natural assets. The original language appeared to capture the community aspirations for their environmentally significant areas and the need to retain the existing rural atmosphere.

An example is the following:

***APPENDIX E ENVIRONMENT & HERITAGE GROUP – VISION - Retain Rural Atmosphere***

*Continue to develop river as an Asset*

» *Walking tracks, vegetation, environmental corridor between flora & fauna reserve & river*

» *Continue to develop & protect flora & fauna reserve*

*Inverleigh Structure Plan Review • Prepared for Golden Plains Shire by Connell Wagner Pty Ltd*

*• March 2005*

“To develop and protect” is firm language and recognised/captured in the existing planning document:

*“Inverleigh has an array of natural features including areas of environmental significance, rural landscapes and riversides, as well as areas and sites of historical and cultural significance.”*

*“The community’s vision for Inverleigh is a town that protects its environmental and heritage assets and rural appeal while providing new residential opportunities, services and facilities in quality, low density environments.”*

But it has been removed and replaced with:

*“Inverleigh is a rural service town that is appealing for its heritage, environmental and river environs.”*

It now reads like a prospectus.

There are multiple shifts in language, tone and substance which seemingly can not be explained as purely due to the current rationalisation efforts of planning schemes by the State Government, nor by an illustrated shift of local objectives and strategies into the Structure Plan.

A further example is the removal of Objective 4 "To protect the natural environment and promote the development of an open space network and continue to enhance the river corridors and landscape of the township." and its strong set of strategies including 4.3 "Protect the significant environmental values of the Inverleigh Nature Conservation Reserve (Common)....". However the Inverleigh Nature Conservation Reserve is not directly referred to at all within the table of Open Space and Natural Environment on page 53 of the new Inverleigh Structure Plan.

I think it is imperative that the Council prepare an audit detailing where each of the quite reasonable objectives and strategies which were featured in the previous structure plan and planning schedule have been accounted for. They should then illustrate how environmental protections have been enhanced, speaking to an acknowledgement and appreciation of our changing climatic conditions and future projections for our area.

It is clear that areas of natural beauty within our Shire are the subject of growing and continued developer interest because of the added monetary value such areas bring. There is a broader community expectation that the Council should be giving due regard to protecting these areas to the best of its ability from the impacts that inevitably come from development pressure. Unfortunately to me the current changes do not impart the sense that this is occurring. I invite the Council to rectify this by reviewing the proposed Amendment changes and find ways to better reflect the high regard many in the community have for the future of our beautiful rivers, reserves and small township amenity.

Regards,

██████████  
██████████  
██████████





[Redacted text]

### Inverleigh Structure Plan – Submission from [Redacted]

[Redacted] is a recently incorporated organisation that has as its goal: “A healthy, flowing, life sustaining Barwon River system which is valued by all the community”.

The [Redacted] is an umbrella organisation for individuals, Landcare groups, Friends groups and other like-minded groups that are concerned by the state of the rivers in the Barwon River catchment. The key aim of [Redacted] is to shine a light on the impact that climate change and population growth is already having on the river system and advocate for policy change at all levels of government to minimize this impact and in fact reverse the decline that is becoming increasingly evident in the health of the Barwon river system.

[Redacted] is deeply concerned by the proposal to develop land on the north side of the Leigh River, bounded by the Inverleigh Nature Conservation Reserve and the Inverleigh-Teesdale Road.

We believe this development, as proposed with 0.4 Ha blocks, will adversely affect the health of the Leigh River and the Inverleigh Nature Conservation Reserve and consequently the Barwon downstream. This submission has been prepared with advice from [Redacted], [Redacted] and [Redacted] who have a long association with the Inverleigh Nature Conservation Reserve.

Our concerns are as follows.

**1. Storm water and waste management** - In its introduction to the Inverleigh Structure Plan, the Shire has commented on the need for careful management of these matters. Inverleigh currently is not sewerred and the proposal indicates the blocks in the Plan will rely on septic tanks for sewerage management. The blocks are located on a slope that drains toward the Leigh River. Whilst it is suggested storm water and sewerage can be managed on the smaller sites, compared to the larger 1 Ha sites originally contemplated, this is by no means guaranteed and there is a risk of contamination of the Leigh River that cannot be ignored. We strongly recommend the larger size blocks be retained, or if not, that Council makes it a condition of the plan that an independent expert report be prepared to verify that the risk of contaminating the river by smaller block sizes is within EPA standards.

**2. The Bio-Link** – It is proposed in the development prospectus that a 60 metre, centrally located corridor be set aside to act as a “bio-link” between the Inverleigh Nature Conservation Reserve and the Inverleigh River. The proposal states that this “biolink” will be a multi-use corridor that will be kept in a state to allow emergency vehicle access as

needed and will be flanked on both sides by housing. Pedestrian access will be allowed and pets (dogs and cats) will have access to the corridor, either under control of their owners or otherwise.

Expert opinion provided to the [REDACTED] suggest it is unlikely the proposed bio-link will function adequately as a corridor for wildlife.

The area will be impacted at night by light and noise pollution from adjacent homes. In addition to the impact from domestic pets, a narrow corridor can also encourage pest species such as Noisy Miners to colonise the associated trees to the detriment of smaller native birds and insects. This is referred as the Edge Effect.

If the subdivision is to progress in any form we recommend that, a second corridor of at least 100 metres in width be established which would be specifically for wildlife and less impacted by potential intrusions of domestic animals and would provide a proper wildlife corridor connecting the reserve and the river.

A preferred location for this corridor would be on the western boundary of the land parcel, abutting the Inverleigh-Teesdale Road. Whilst this site may carry a risk of animal interactions with motor vehicles it is more likely to provide the role of a conduit for animals from the reserve to access the river and vice versa. The corridor will need to be planted with appropriate local provenance over storey and under storey species to provide for the movement of a range of native fauna. The ground should not be mowed as this can be very adverse for reptilian species. A corridor in the suggested site would also act as a buffer between the parcel of land under consideration in this current proposal and the farmland to the west and upstream. (Refer to attached documents regarding wildlife corridor design)

**3. Establishment of Riparian Zone Vegetation** - The importance of intact riparian zones is universally acknowledged as critical to waterway health. There is a flood overlay that affects the parcel suggested for development. Incorporating a protected riparian zone with appropriate indigenous vegetation, extending up to 50 metres from the river edge is best practice. It would provide habitat for many species and help stabilise the river banks and mitigate damage in flood events. This should be a high priority. (personal communication [REDACTED])

**4. The Inverleigh Nature Conservation Reserve** – The Reserve that lies to the north of the proposed development was set aside as a Flora Reserve in 1978. It is a valued remnant grassy woodland and the integrity of the reserve should be protected. Species noted in the Reserve include – Short-beaked Echidna, Eastern Grey Kangaroo, Swamp Wallaby, Koala, Sugar Glider, Common Brushtail Possum, Common Ringtail Possum, eight species of bats, Eastern Three-lined Skink, Garden Skink, Eastern Blue-tongued Lizard, Jacky Lizard, Lowland Copperhead, Little Whip Snake, Eastern Brown Snake, five species of frogs and over forty bird species have been recorded. (Refer attached document authored by [REDACTED])

It is noted in the Draft Inverleigh Structure Plan – 2019 that there is an acknowledged fire risk associated with the vegetation in the Reserve. Adequate setbacks should be

provided by the developer to reduce the risk to the new development from these bushfires.

Given the proposal indicates housing will be built on the southern side of Common Road which separates the Reserve and the parcel of land under consideration it would be highly regrettable if any vegetation was removed to mitigate the fire risk.

**In conclusion:** We ask that consideration be given to our concerns and that the block size be kept at 1 Ha, that the Bio-Link be complemented by a properly considered wildlife corridor on the Teesdale-Inverleigh Road boundary, that a riparian vegetation zone be established, that there is no adverse impact on the Inverleigh Nature Conservation Reserve and there is proper management of storm water and waste.

It will be too late if the proposal is enacted without including these concerns.

██████████  
████████████████████

#### **References**

Monica Bond (2003) Principles of wildlife corridor design. Centre for Biological Diversity. October, 2003.

Patron: The Honourable Linda Dessau AM, Governor of Victoria



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**Fire Safety Referrals**  
**Fire & Emergency Management**  
Email: [firesafetyreferrals@cfa.vic.gov.au](mailto:firesafetyreferrals@cfa.vic.gov.au)  
Telephone: 03 9262 8578

Our Ref: [REDACTED]  
Telephone: [REDACTED]  
Council Ref: C87  
[REDACTED] [REDACTED]

16 October 2019

[REDACTED]  
Strategic Planning Team Leader  
Golden Plains Shire  
P. O.Box 111  
**BANNOCKBURN VIC 3331**

Dear Laura

### **SUBMISSION TO PLANNING SCHEME AMENDMENT**

**Proposal:** Amendment C87 – Inverleigh Structure Plan  
**Location:** Inverleigh

Thank you for providing CFA notice of C87 in accordance with section 19 of the *Planning and Environment Act 1987*

CFA has reviewed the proposed planning scheme amendment and would like to make the following submission.

#### **Bushfire Hazard**

- The broader landscape around Inverleigh is predominantly grassland/cropping land with treed/forested areas along creek/river lines and in the Flora and Fauna Reserve to the northwest of the Township.
- Most of the land around Inverleigh is in a Bushfire Prone Area (BPA), with areas within 150m of the Flora and Fauna reserve subject to a Bushfire Management Overlay.
- Council has prepared a Strategic Bushfire Risk Assessment for the Inverleigh Structure Plan which provides a realistic assessment of the bushfire risk around Inverleigh.

#### **Bushfire Mitigation Measures**

- Bushfire risk should be reduced to acceptable levels in identified potential growth/development areas by:
  - Avoiding residential development in higher risk areas;
  - Providing appropriate setbacks of dwellings from classified vegetation;
  - Consolidating the Township edge to provide a clear distinction between rural (farming) land and residential land to limit the potential for grass/bush fire spread into the town area.

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Protecting lives and property

[cfa.vic.gov.au](http://cfa.vic.gov.au)



Patron: The Honourable Linda Dessau AM, Governor of Victoria



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**Fire & Emergency Management**  
Email: [firesafetyreferrals@cfa.vic.gov.au](mailto:firesafetyreferrals@cfa.vic.gov.au)  
Telephone: 03 9262 8578

- Provision of appropriate defensible space, building envelopes, water supply and access/egress to development areas and individual properties; and
- Construction of new dwellings to the appropriate Bushfire Attack Level (BAL) construction standards

### Conclusion

CFA supports the amendment in its current form.

If you wish to discuss this matter in more detail, please do not hesitate to contact me on [REDACTED]

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Jim Boat'.

[REDACTED]  
Operations Manager | Manager Community Safety  
CFA West Region

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Protecting lives and property

[cfa.vic.gov.au](http://cfa.vic.gov.au)

Our Ref: CSM48597

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22 October 2019

Attention: [REDACTED]  
Golden Plains Shire  
PO BOX 111  
BANNOCKBURN VIC 3331  
Emailed to: [enquiries@gplains.vic.gov.au](mailto:enquiries@gplains.vic.gov.au)

Dear Laura

**Golden Plains Shire Council Planning Scheme Amendment C87  
Inverleigh Structure Plan**

We refer to Council's correspondence dated 16 August 2019 notifying VicTrack of Amendment C87 to the Golden Plains Shire Council Planning Scheme.

We understand that the amendment proposes to support the extension of the Low Density Residential Zone from the Township Zone in the township of Inverleigh.

We have reviewed the amendment documentation in the context of the site and the rail corridor. VicTrack wishes to advise that the proposed rezoning does not impact on the VicTrack land, existing rail operations or future network development.

VicTrack wishes to advise also that zoning anomalies exist in favour of the Council which needs to be addressed – refer Attachment 1: Current Zoning. VicTrack land is outlined with broken dark blue line and the anomalies in zoning include:

1. The majority of land on southern side of tracks is currently zoned Farming Zone but should be Public Use Zone 4 – Transport.
2. Land hatched above Cemetery Road has been sold by VicTrack therefore should be rezoned to Low Density Residential Zone.
3. Lease Lot 18 on map is leased to Australian Rail Track Corporation.
4. Lease Lot 16 is vacant land within the PUZ4.

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**VicTrack**

Level 8, 1010 La Trobe St Docklands VIC 3008  
GPO Box 1681 Melbourne VIC 3001  
T 1300 VICTRACK (1300 842 872)  
[victrack.com.au](http://victrack.com.au)

**VicTrack**

VicTrack has no objection to the amendment but advised that the zoning anomalies be addressed prior to Planning Scheme Amendment C87 approval.

Should you have any queries, please contact me on [REDACTED] or [REDACTED].

Yours sincerely



[REDACTED]  
Planning Manager

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**VicTrack**

Amendment C87gpla – Inverleigh Structure Plan

87

Submission

[REDACTED]  
[REDACTED]  
[REDACTED]

I value the unique nature of Inverleigh, with its environmental and heritage aspects and landscape, along with the village community atmosphere. People are attracted to Inverleigh for its peaceful country lifestyle and opportunities to engage in rural life.

I oppose the amendment C87gpla and would prefer a diversity of block sizes to meet a diversity of needs. I am concerned that the C87gpla amendment creates a situation in which .4 hectare is the normal size block, and larger blocks are only created to overcome terrain or other specific constraints. The amendment opens the way for large block subdivisions to .4 hectare in the future.

The amendment as it stands does not make developer contributions and obligations clear and transparent in a way that ensures that time frames and post-sale obligations are clearly understood by the community and that the benefit of Inverleigh in general can be seen to be underpinning Golden Plains Shire and Developer agreements. This would include an overview approach to requirements for cultural sites and landscape and heritage values.

Amendment C87gpla allows for too much and too rapid population growth, with the Strategy Plan not providing clear guidance on the rate of population growth, with no inclusion of a plan for staged land release. Already announced land releases exceed the suggested 27 new households per year. In this scenario it is easy to see that 'catch up' provision of basic and safety infrastructure could occur, rather than planned for and prepared provision.

A mix of block sizes would best meet expressed needs of residents of Inverleigh. Amendment C87gpla would result in nearly all future blocks being .4 hectare. A better plan would require developers to provide a mix of block sizes within a development in order to achieve a permit. A range of block sizes would slow and limit population growth to the benefit of Inverleigh, reducing pressure on infrastructure and the environment.

The standard of the Inverleigh Structure Plan is very poor, with many aspects appearing to be in probe or early concept stage. Maps and statements are inaccurate and the research backing claims does not always use up-to-date data and recommendations. More work is required so that the document is correct and includes clear expectations, commitments, naming of responsible bodies and funding sources. Only then can the community really assess the amendment and its implications and impact on a whole range of items that make up the amenity, infrastructure and environmental aspects of life in Inverleigh. Only then can the plans be clear enough for them to be implemented and for people involved in putting them into practice be held accountable.

In addition I would like to note that community consultation was not carried out effectively or diligently, with the opportunity to ask questions about the draft at a public meeting in Inverleigh being denied.

Expanding on my points:

**The proposed amendment .4 hectare block sizes will increase Inverleigh's population very quickly putting pressure on natural assets and man-made infrastructure and changing the village atmosphere.**

The rate of proposed population growth is a construct of the Golden Plains Shire, which places various agendas, including that of property developers and other Golden Plains Shire projects ahead of what is best for Inverleigh and the Inverleigh Community's constantly expressed wish to retain a rural village atmosphere. The Victorian State Government expectation for land availability is over the whole shire. The fact that it is possible to create .4 hectare blocks does not mean that it is mandated for Inverleigh, or best for Inverleigh.



Mesh case study discussions of .4 hectare size versus larger blocks mentioned that one of the issues of larger block size is that developers could not be expected to cover all the connectivity walking paths, bridle paths and green links in the plan, and that the Shire may be forced to contribute. The provision of walking and riding tracks and green links is basic to what rate payers could expect of the Golden Plains Shire. While major projects such as The Hub do not take place in Inverleigh, consistent with Inverleigh's wish to retain a village atmosphere, surely the connectivity aspects of the plan could be expected to be basic needs and could be expected of good town planning and to be provided by good local government using ratepayer money responsibly and equitably. The Golden Plains Shire should not be making decisions based on pressure from landowners/developers nor based on the fear that they might be expected to provide some funding for basic infrastructure.

### **Education**

The Primary school suggestions required at the rate of population growth suggested would completely change the nature of the school and of a student's experience there. Reducing the playground size with the addition of many portables or a possible second campus on the Education Department land at the corner of Railway St and McCallum Rd (currently a plantation) would not be desirable for best practice in education nor for a united village school feel.

Likewise, the Early Learning Centre could expect greater use and the need for upgrades on its present site, all of which should not be provided in catch-up fashion.

The expected numbers would be able to be projected based on the demographic changes that have occurred over the last ten years. Proper planning, along with control of the rate of population growth, needs to be in place. A commitment to assisting the tennis club to move to the sporting complex would make better planning sense than noting that funding for such a move would be hard to find. Consequently, I do not see a serious commitment on the part of Golden Plains Shire to meet the impact that Amendment C87gpla would create.

### **Roads**

A larger population increases pressure on roads and bridges in and out of estates, around the town and onto the Hamilton Highway. The Structure Plan does not show that there has been a commitment or funding allocation plan, apart from requiring a developer contribution. Agreements on safety and sustainability aspects, accountability and a time-line for provision are basic requirements for any subdivisions. Allowing so many .4 hectare blocks would exacerbate all the issues and create more in times of low visibility and danger caused by fire.

### **Fire Risk**

The structure plan states that the amendment is acceptable from a bushfire risk perspective but acknowledges that that would only be so if many stakeholders and government bodies made expected and timely contributions to the area. The lack of assurance from all those people, their different agendas and available funds, and the lack of detail of fire management and prevention do not invoke confidence in the bushfire risk or management being acceptable if the population rises in line with the amendment proposal.

### **Environmental Issues**

Increasing the number of houses puts pressure on the remnant natural environment. This is particularly relevant to the Inverleigh Nature Conservation Reserve, which is a precious and important area for native flora and fauna, including several rare flora species, and at least one critically endangered orchid. The draft plan does not label the whole area as Conservation and Resource Zone, and I presume that is an error, given that it has been stated that that area is valued and the habitat for rare and varied native flowers and a range of fauna is to be protected.

The Structure Plan notes some ideas for land size immediately surrounding the Inverleigh Nature Conservation Reserve, but Golden Plains Shire recognises that the responsible authority for its management is Parks Victoria. The amendment would result in an increase in households and domestic pets and changes to the existing landscape. At the very least I would want Golden Plains Shire to establish the impact of any developments in the area and to create overlays that address detrimental impacts, for example a cat curfew.

The green links connecting the common to the river are very important, given that there are no summer water sources there most years. This is not a matter of block size, but rather one which the Golden Plains Shire should take over-view responsibility for, researching and creating basic infrastructure, either using rates or as a requirement for a developer. I do not feel confident that the green link described, being multi-purpose, is the best for animals and birds.

Smaller blocks present greater issues related to storm water drainage, effluent absorption and seepage of pollutants and sediments into rivers and water ways. While individual blocks need to meet the EPA requirements, there is no doubt that natural flows will be disrupted with built drainage systems being provided and hard surfaces and houses across the landscape. The increased number of households allowed by the amendment would exacerbate these problems.

I would like the Strategy Plan to include accountability for developers to ensure all environmental requirements are met – an accountability which would continue after sale.

#### **Heritage and Cultural Sites**

Retention of the Lullote Homestead and old trees is mentioned in the Structure Plan. Golden Plains Shire accepts that there are a number of Aboriginal cultural sites in the areas proposed for subdivision and plans to make appropriate care for them the responsibility of the developers. I would prefer a broader view approach based on research and consultation with appropriate bodies, with expectations being clearly outlined to developers.

#### **Sustainability**

Amendment C87gpla would create a large number of .4 hectare blocks, losing the diversity of block sizes which allow small scale agri-businesses to be viable. More blocks will create an increase in non-organic herbicide and pesticide use which can be airborne or water borne, and which can impact negatively on existing businesses which rely on their organic or biodynamic status being retained.

Whatever the block size, I support the Golden Plains Shire in using the Infrastructure Design Manual and would like it to be referenced in the structure plan as a guide to requirements for developers in asking for infrastructure that makes use of sustainable technology and materials, providing for 50 years of use.

Sustainable population growth allows for stage of life change and long-term residency. A diversity of block sizes and provision for needs at different stages of life would allow for people to stay in their own community as they age. These welfare factors of a sense of belonging, of connections, of contribution to a community and support for and from that community, are not addressed in the Structure Plan or the Amendment.

#### **Inadequacies of the Inverleigh Structure Plan 2019**

The draft plan includes errors, inconsistent labelling and suggestions that have not been raised with stake holders and yet are stated as possible options. It seems poorly prepared and more like a concept plan. It uses some out of date data, such as that for the fire assessment. It needs more research for the solutions it suggests and a clear listing of funding sources, and expectations of developers and others, with accountability built in.

Items such as the kindergarten needs, which does not take into account current 3-year-old sessions or recent State Government announcement of funded sessions for all three year-old children to be rolled out by 2022, should have included projections of numbers in various scenarios if statements of the feasibility for the capacity of infrastructure are to be taken seriously.

The Inverleigh Mechanics Institute and Public Hall Committee of Management was not consulted before the Public Hall was included as a stop gap for spill over kindergarten services.

The bridle path takes in private land and land on 99-year leases and crosses the Leigh River to the west of the town on a non-existent bridge.

I would like the draft plan to be prepared to a much more accurate and helpful standard with up to date research and investigations explained so that community members can make informed assessments of proposals and whether the plan is of benefit to the Inverleigh Community. Funding sources for proposals need to be noted and expectations of developer contributions need to be listed so that they can be held accountable. The plan needs to be clear enough in intention and detail that it can be worked from effectively for the next 15 years regardless of Shire staff turnover.

There are so many areas of the Inverleigh Structure Plan which are not detailed enough or carefully, transparently and accurately presented for Inverleigh community members to have confidence in the plans not being subject to change in order to suit agendas other than the best interests of Inverleigh residents in general.

#### **Lack of proper community consultation**

I attended the GPS council meeting where the Inverleigh Draft Structure Plan was presented, and its acceptance voted on by councillors. I understood, perhaps incorrectly, that the passing of the draft plan was a step in the process and that there would be opportunities for people to ask questions at a meeting in Inverleigh and for feedback to affect the draft. Such a meeting was arranged with the Progress Association but was cancelled at the last minute by Golden Plains Shire staff.

Consultation involves several stages – the stage where suggestions are made and initial responses are contributed, the stage where surveys collect ideas in relation to specific questions or statements with no subtleties or explanations included, and the stage where the ideas are brought together to the best standard possible as a draft. That last stage is vital for questions and answers because the people involved have something tangible to consult over and the ideas have been researched for viability. It is very valuable if this can be done at a public meeting because everyone contributes to a better understanding of the plan and an appreciation of what concerns others and how areas they hadn't thought of are impacted. It is a great pity that this last stage was not offered in this case.

The Shire mail out regarding submissions did not reach all householders, including me, since it was wrongly assumed that there was mail delivery in Inverleigh and that addresses alone would be sufficient for post box distribution. An incorrect email address for the Golden Plains Shire also misled people putting in submissions. As a member of the GPS Community Engagement email list, I am mystified as to why there was no information re key dates and the submission process when the avowed purpose of that list is to keep us informed of matters relevant to our area. At least the submission time has been extended, but many people may not know this (no email to me). I am sure that these blunders were unintentional, but they may have prevented some people from putting in submissions.

#### **Summary**

I oppose the Amendment C87gpla as proposed in order to protect the environment, infrastructure and amenity of the rural lifestyle that people come to Inverleigh to enjoy.

I would support an amendment that proposed a mix of block sizes, clearly designating a reasonable proportion of each development to be larger blocks, as in the current situation, with the option for the remainder to be .4 hectare blocks if desired and if all environmental requirements were met.

Ideally more work would be done on the Inverleigh Structure Plan, bringing it to a high and detailed standard, which would enable it to be implemented and evaluated effectively. Ideally this tangible plan would be presented to the community. Such consultation would ensure that I would have confidence that my thoughts were considered and, whether accepted or not, had contributed to a plan that would serve my town well over the next fifteen years.

Thank you for the opportunity to put in my submission.

Yours sincerely,



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<b>DOCUMENT (Inbound)</b>		<b>DETAILS</b>	
<b>Summary</b>	Submission to AMENDMENT C87 - INVERLEIGH STRUCTURE PLAN [REDACTED]	<b>Status</b>	Completed <b>Deadline</b> 11/11/2019
<b>Information</b>		<b>Priority</b>	Medium <b>Received</b> 28/10/2019 10:15:39 AM
<b>Comments/Notes</b>		<b>Type</b>	Email <b>Ref</b> IN19/49DAAEC3
		<b>On Hold</b>	No

**RELATED DOCUMENTS**

**PEOPLE (2)**

**Owner** Strategic Planning  
**Manager** [REDACTED]  
**Reader**

**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

**WORKFLOW**

No records found.

**CONTENT**

<b>Attachments:</b>				<b>Links:</b>			
File Name	Size (kb)	Attac by	Attached On	File Name	Size (kb)	Cre by	Created On
No records found.				No records found.			

**From:** [REDACTED]  
**Date:** Mon Oct 28 10:15:39 AM AEDT 2019  
**To:** Enquiries<Enquiries@gplains.vic.gov.au>  
**CC:**  
**BCC:**  
**Subject:** Submission to AMENDMENT C87 - INVERLEIGH STRUCTURE PLAN



**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



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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. I.e. 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**

<https://ecm.gplains.vic.gov.au:8443/altusecm/secure/print/doc.jsf?reclId=d8d9e99-3ec4-439e-9949-430b5337b4a3>

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