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Sustainability and Health of small-scale intensive agricultural businesses

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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 output from the septic systems and their likely impact on the river should be done as part of the assessment and viability for this development to proceed. Data collection from Site CO_LEIO17 should be resumed ASAP to ensure data-driven insight in environmental changes and stormwater quality monitoring undertaken.

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

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*Please attach additiona	pages a	necessary
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Signature.	Date 13/10/19.	
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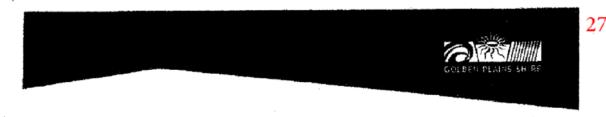
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*Upgrade Hamilton Highway to evaluate overtaking options in order to have a better flow of traffic. Currently there are many areas that have double lines that are suitable for overtaking and areas where you can overtake but overtaking section of road is not long enough and quickly converts back to solid lines before you complete the overtake.

- *Ensure resident's see what their rates are paying for re upkeep of common areas. Mowing of nature strips etc are done rarely and when done, only one strip is mowed making Inverleigh unsightly. An example of this is the entrance to Common Road and the Common Road/ Hamilton Highway corner.
- *Include Green waste bins as part of current bin collections in line with Geelong shires.
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- *Initiate plan to tidy Inverleigh Common decreasing possible fire risks and possible injury to local residents should a fire occur.
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- *Provide Inverleigh residents with complementary tree mulch at designated zones.



AMENDMENT C87gpla - INVERLEIGH STRUCTURE PLAN SUBMISSION FORM

Name: . Address: Contact telephone number:

I have outlined my areas of concern below:

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Bush Fire Risk and Strategic Bush Fire Risk Assessment

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

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

Educational Facilities Impact

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

Retain Town Boundary

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

Inverleigh Flora and Fauna Reserve impact

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

§ 5220 7111

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Item 7.6 - Attachment 5

Page 227



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(@) enquiries@gplatns.vic.gov.au

Page 228

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well as the time it takes before this risk drops again1. Considering the backlog in adequate management in the Common since the highest recorded Victorian bushfire risks in the mid-2000's, the risk imposed by the Common on the Inverleigh Community, in particular those living along Common Road, can be expected to be above the Victorian average. The Strategic Bushfire Risk Assessment also does not mention the elevated fuel load as a legacy of the 2009 fuel reduction burn as an additional risk. It also does not incorporate this shortfall in assessing the fire risk, which is merely based on a historic assessment of the Inverleigh

Considering the high level of connectivity of fuel at ground and near ground level, the bush fire risk of the Common should have been rates as extreme. Combined with, under prevalent bush fire conditions, only a single access/egress (Common Road) and poorly maintained tracks inside the reserve, the likelihood the CFA commander will decide against a crew to the Common in case of a bush fire. Poor maintenance of the Common has put life and property at risk.

1 https://www.safertogether.vic.gov.au/landscapes/west-central

Track Maintenance

The Common contains Acada Paradoxa, a native plant that has been on the noxious weed register. This yellow flowering shrub contains oils with a flash point at 35°C, 14° below that of eucalyptus. Its presence elevates the bush fire risk, particularly under extreme weather conditions 2,3. The Bush Fire Risk Assessment reports that since 2015, fuel reduction burns in the Common were replaced by selective removal of Acacla Paradoxa. No details are provided on the amount of Acacla paradoxa removed (as tonnage and % of estimated total). Its capacity to regrow or future removal targets and corresponding responsibility are also not included in the Bush Fire Risk Assessment nor the structure plan/amendment C87.

The efficacy of selective removal of bushfire prone Acacla Paradoxa as sole bush fire risk mitigation strategy is not reported. Searches in the public domain and scientific literature (scopus search conducted on 17/9/2019, Acacla Paradoxa management

searches in the public domain and scientific literature (scopus search conducted on 17/3/2015, Acadia Paradoxa management provides 7 hits, none in relation with bushfire management) also failed to reveal any evidence that removal of Acadia Paradoxa is a bush fire mitigation risk. Documents agree Acadia Paradoxa should be avoided in a bush fire resilient gardens (see for example 4,5) and that removal is the best Acadia Paradoxa management strategy6. Concerns remain that the selective removal of Acadia Paradoxa alone does not remove the large amount surface and near-surface fuel originating from the dead trees and other shrubs throughout the Common. The high level of connectivity of the dry, near surface fuel makes this an extreme fire hazard (Overall fuel assessment guide, Department of Sustainable Development and Environment, 2010). The removal of Acacia Paradoxa as bush fire mitigation risk as proposed in the Bush Fire Risk Assessment underpinning the inverteigh Structure Plan is therefore not valid, undermining the technical validity of the document.

The Strategic Bushfire Risk Assessment indicated that the tracks in the Common are well maintained to provide access. The condition of the tracks in the Common is poor due to sparse maintenance. Parts of the Eastern and Old Teesdale tracks are eroded with >40 cm deep holes, making accessible with 4WD vehicles impossible, let alone fire trucks. These tracks will complicate effective bush fire management in the likely event of a fire in the Common.

Despite the State Bushfire Plan 2014 conclusion that "the bushfire risk in Victoria is increasing", the inverteigh Structure Plan and Amendment C87 fail to include measures to counteract this increasing risk. With climate change, the number of extreme weather events is expected to increase, as already evidenced by the increase in days with temperature over 35 °C per year, with a 10-year average in 2007, and 11 and 14 days recorded in 2018 and 2019 (until September) respectively. Lightening is the major cause of bush fire, and considering historic data shows a bush fire in the Common was caused by lightening, highly relevant to the bushfire risk. With global warming, the frequency of thunder storms is decreasing but 25% more of the strongest storms can be expected, accompanied with a 5% increase in lightning7. This risk is not mentioned in the Bushfire Risk assessment.

2 The Effects of Alien Shrub Invasions on Vegetation Structure and Fire Behaviour in South African Fynbos Shrublands: A Simulation Study B. W. van Wilgen and D. M. Richardson Journal of Applied Ecology Vol. 22, No. 3 (Dec., 1985), pp. 955-966

3 Evaluating the invasiveness of Acacia paradoxa in South Africa, South African Journal of Botany 75, 3, 2009, Pages 485-496

R.D.Zenni J.R.U.Wilson J.J.Le Roux D.M.Richardson https://doi.org/10.1016/j.sajb.2009.04.001 4 https://www.surfcoast.vic.gov.au 03-community > emergencies-and-safety

5 https://www.naturalresources.sa.gov.au files > sharedassets > botanic_gardens
6 Moore, J. L., Runge, M. C., Webber, B. L. and Wilson, J. R. (2011), Contain or eradicate? Optimizing the management goal for Australian acacia invasions in the face of uncertainty. Diversity and Distributions, 17: 1047-1059. doi:10.1111/j.1472-4642.2011.00809.x

7 https://www.giss.nasa.gov/research/briefs/delgenio_07/

Amendment 87 proposes the decrease of the minimum block size to 1 acre, effectively increasing population density. This contradicts information discussed for Amendment 74, where limiting the size to 1 to 2 hectares is used to reduce the extent of population growth that might be exposed to bushfire risk .8 Considering the bush fire risk imposed by the Common, development of Potential growth area 3 should be reconsidered, in line with Golden Plains rulings for other development areas.

Common Road and Inverleigh Teesdale Road are marked as egress in the event of a bushfire in the Common. Inverleigh-Teesdale road is unlikely to provide a safe egress towards Teesdale, as this will lead through the Common and hence through the fire. In a scenario of easterly winds, the north- westen part of Common Road will be filled with smoke and spot fires due to ember attacks. Under bush fire conditions with northerly and north-easterly winds, the section of inverleigh-Teesdale Road connecting Common Road with The Hamilton Highway across the Twin Bridges will be exposed to smoke and ember attack, and will not function as egress. With the likely scenario of north westerly winds, the functionality of whole of Common Road is in doubt as ember, ash and smoke are likely to travel down Common Road towards the Hamilton Highway. These scenarios are depicted in Figure 1. This means that under the most likely bush fire scenarios, Common Road will be the sole egress for all residents. This is a serious risk and lives are likely to be lost, particularly if a bottleneck forms anywhere on Common due to fallen branches/trees, smoke or accidents due to panicking residents evacuating. The risk of incidents during evacuation increases rapidly with the number of cars evacuating, arguing against the proposed high-density residential development in growth area 3. The risk to life and property as a result of Common Road as sole egress, nor bottlenecks caused by ember attacks, fallen trees or panicking residents are not articulated in the Strategic Bush Fire Assessment.

Figure 1 Map of the Common and Common Road with arrows indicating showing the direction ember, ash and smoke will be sent from the Common in case of a bushfire. Under Northerly and Easterly winds, the north-western part of Common

Road will not be usable. With North-Westerly winds, the functionality of Common Road as a whole could be severely

compromised due to smoke, ashes and ember.

The proposed development will increase the number of residents evacuating through Common Road (more than double). These residents will first have to flee into the bush fire affected area at the northern end of Common Road, which is intended to serve as fire break, and use this to connect with the rest of Common Road as egress. This decision, appears to put human life at risk and conflicts with planning and development policies including Victorian Planning Practice Note 64. No Refuge in Inverleigh

The Strategic Bushfire Risk Assessment fails to mention there is no shelter/refuge in Inverleigh. Additionally, documents provided by Golden Plains Shire suggest there is a safe refuge8. The current CFA advise for Inverleigh residents to travel down the Hamilton Highway to Geelong because 'there are NO designated Neighbourhood Safer Places – Places of Last Resort at

It is unclear if the Hamilton Highway will allow for safe and orderly evacuation, particularly under poor visibility conditions.

https://ecm.gplains.vic.gov.au;8443/attusecm/secure/print/doc.jsf?recid=7e069eea-b9ac-42b6-98a2-b4a0c3cde92d

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Additionally, no provisions are made in Amendment C87 for the development of a refuge in Inverteigh to minimize the reliance on the Hamilton Highway in the event of a bush fire. The panel discussions in Amendment 748 discuss access to a near and safe refuge as elemental to rezoning that area as residential". If it would have been known that safe access was not available to a safe refuge within close proximity to the site, the Panel may have had a very different conclusion regarding the Amendment." 8 This makes availability of a refuge quintessential for Growth area 3 as proposed in Amendment C87, still the refuge is not mentioned in the Structure Plan, Bush Risk Assessment or Amendment.

In conclusion, the Strategic Fire Risk Assessment underpinning the Inverleigh Structure Plan grossly underestimates the bush fire risk imposed by the Common. Fuel reduction burns have not been conducted in line with recommendations from the Royal Commission into the 2009 Victorian Bush Fires nor the DELWP strategic Bushfire Management Plan. Proposed alternative strategies (incl. selective Acacia Paradoxa removal) have not been evaluated on effectiveness as bushfire mitigation strategy, tracks in the Common have not been maintained, egress options not thoroughly evaluated. Additionally, the fact there is no bush fire shelter in Inverleigh has been overlooked.

Amendment C87, the Strategic Bushfire Risk Assessment and the Inverleigh Structure Plan all fail to provide clarity who carries responsibility for management and assessment of the bushfire risk of the Common. The Inverleigh community needs to be presented with a clear management plan for the Common, clearly articulating the risk mitigation strategies, their scale and periodicity as well as clearly identify responsibilities for execution, monitoring and payment. Additionally, the residual risk of the Common needs to be assessed and reported back to the community on an annual basis. Considering the Common comprises of bushland, the existing bush fire risk assessment conducted for inverleigh township cannot be transferred to the Common and adjacent areas without further review and careful considerations of fuel, landscape and other factors. Amendment C87 and approval of any new developments in Inverleigh should only be evaluated once a clearly articulated and independently reviewed bush fire management strategy has been communicated with residents and implemented. Once the strategy has been implemented, the Strategic Bush Fire Risk Assessment needs to be re-done to define areas for new development, earmarking these that do not impose additional risk on life and property.

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8 https://www.goldenplains.vic.gov.au/sites/default/files/Golden%20Plains%20C74%20Panel%20Report.pdf 9
https://cfaonline.cfa.vic.gov.au/mycfa/Show?pageld=publicDisplayDoc&fname=2017/CIG-BSW-Inverleigh-3_00_78605.pdf



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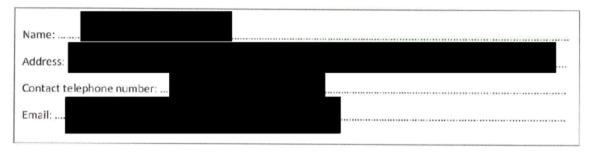
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Report this message as spam



AMENDMENT C87gpla – INVERLEIGH STRUCTURE PLAN SUBMISSION FORM

PLEASE PROVIDE YOUR DETAILS BELOW



PLEASE PROVIDE YOUR SUBMISSION BELOW:

Please see attached sheets.

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Amendment C87 gpla- Inverleigh Structure Plan.

Comments provided by

9-10-2019

- I ... I agree with retaining the existing settlement boundary.
- 2... I agree with planning for continued moderate population growth in the town.
- 3 ... I agree with removing the minimum lot sizes of 1-4 hectares from areas zoned or earmarked for Low Density Residential Zone so the minimum lot size of this zone defaults to the State Planning Policy minimum of 0.4 hectares. 4..... I agree with providing for the extension of the Low Density Residential Zone from the Township Zone and Inverleigi Recreation Reserve in a westerly direction towards Phillips Road and Riverview Road.
- 5......Identifying the area west of Phillips and Riverview Roads as a Future Investigation Area for residential growth.

Council should be doing all within its power to make an immediate start to encourage the development of this area. The existing allotments were created in very early surveys, back in late 1,800s. It is mostly higher well drained land owned by many families. Lack of a water supply has retarded development. The existing water main ends at the corner of Phillips Road and Cemetery Road.

An extension of this water main westwards along Cemetery Road to Mahers Road would be a good start. Barwon Water should be requested to install this vital water main extension by our Shire Council. Such a back bone water main would allow rib extension mains to be installed along the roads each side of Cemetery Road. Such as Gibson Rd. Fuller Rd. Terrier Rd. Gallager Rd and Mahers Rd. Such extensions could be undertaken by the existing property owners combining in self help private water mains installed by a licensed plumber.

Improve water supply to Southern end of Golden Plains Shire from Winchelsea, now.

As the population of Ballarat, Ballan, and Bacchus Marsh continue increasing, Barwon Water's catchment area to our north could be diverted to these new growth areas by our State Government. Golden Plains Shire should be requesting Barwon Water to install a water main from Winchelsea further down the Barwon River valley to Inverleigh. A suitable location for a storage tank would be on the high land at north end of Barwon Park Road at its junction with the Hamilton Highway. Many benefits would be gained such as securing a permanent higher pressure water supply for the Inverleigh valley. Another important benefit would be a similar improvement in supply and pressure to Teesdale and Bannockburn. These three towns are all experiencing rapid growth in population.

Natural gas supply from Winchelsea to Inverleigh should be on Councils radar.

At the same time as a trench is opened for a new water main from Winchelsea to Inverleigh, a natural gas pipe could be laid in the same trench below the water main. This helps to reduce cost.

Strategic infrastructure required by Barwon Water to improve Geelong Region water supply. Planning is starting now at Barwon Water (see the attached newspaper cutting.)

Some 6 months ago Barwon Water were ordered by the State Government to cease pumping from the

Barwon Downs Borefield.

Why ?.. OVER PUMPING for many decades has depleted the water level in the aquifer, to such an extent

why?.. OVER PUMPING for many decades has depleted the water level in the aquifer, to such an extent that toxic seepage was leaching in to the Barwon River, which had ceased flowing as a result of the current drought. West Barwon Dam had to release water to overcome the Barwon River water quality.

Barwon Water's area of responsibility includes the Otway Ranges. An area that receives the highest Rainfall anywhere in Victoria.

NOW IS THE TIME FOR BARWON WATER TO INVESTIGATE ESTABLISHING A SMALL SCALE "SNOWY MOUNTAINS SCHEME."

Some of the rivers on the ocean side of the high rainfall ridge could be diverted back inland to flow into the West Barwon Dam pipe line to Geelong.

ROADS

HAMILTON HIGHWAY

With an increasing volume of B doubles carrying loads of 45 tonnes or more, and other heavy haulage vehicles on the Highway, Council needs to liaise with Vic Roads to ensure that this essential Highway can be improved to become a safer road.

The trucks driving through Inverleigh travelling to or from Warrnambool, Portland, Mount Gambier, and Hamilton prefer to use the flat Western District Plains and avoid the steep Ceres hill on the Geelong Ring Road.

Inverleigh is the Gateway to Western Victoia. It is essential that the truck parking area opposite the Post Office remains accessible to trucks travelling east and westwards. Council should be endeavouring to increase the area available for trucks to pull up and rest, to improve the safety of travellers.

Upgrading the Hamilton Highway is essential for the safety of Inverleigh residents commuting to work in Geelong or Melbourne.

On behalf of Inverleigh residents and the Long Distance Road Hauliers who are the travellers on the Hamilton Highway, Council needs to request Vic Roads to begin planning and construction for the start of the 4 lane highway upgrade at the Fyansford junction with the Geelong Ring Road.

In the Bruce's Creek valley at Murgheboluc Vicroads need to straighten two dangerous corners, One has 75 kms speed limit, the second corner should be reduced to 80 kms. Both corners have been cause of truck rollover accidents.

HOPES PLAINS ROAD urgently needs reconstruction and a wide sealed surface.

Plans to upgrade the twin bridges on Teesdale road crossing of Leigh River is to be applauded.

Sporting Complex exstension... Appears to be mostly located on low flood plain. I suggest that you consider extending westwards to Phillips road and include an area of slightly higher flood free land . Your plan to enlarge the Sporting Complex area is to be commended.

Inverleigh Flora and Fauna Reserve on the Common Road frontage.

With the residential development on the Lullote property approved, Council should consider doubling the width of the existing firebreak.

Council could seek advice from the Inverleigh C.F.A. Brigade as to how comfortable they are with the present firebreak.

Light industry, Repair shops, and Rural service stores located at corner of Hamilton Highway and Mahers Road. An ideal location with Highway exposure.

Finally I wish to thank you for the opportunity to comment on the Structure Plan for Inverleigh.

For your interest National Rail with the standard gauge railway through Inverleigh also appreciates the flat plains of Western Victoria. Many trains travel this line each day with containers sourced from Perth Darwin, Adelaide, Whyalla, or Sydney.





Between washing dishes, flushing the toilet and having a shower, the average household uses about 462 litres of water a day. But, have you ever thought about where it comes from?

Our water comes mostly from rainfall, with

Greater Geelong supplied by three rivers, the Barwon River, the East and the West Moorabool River.

We can access additional water from the Melbourne to Geelong pipeline. We can also extract groundwater from underneath Anglesea when needed. Our access to water from each of these sources is regulated by

With a hotter climate and less rain, it's time to think differently about how we use water and where it comes from.

the Victorian Government.

Contribute your ideas

We are partnering with our community to design a new sustainable water future for our region. Read more and contribute your views and ideas on our website:

www.barwonwater.vic.gov.au/future

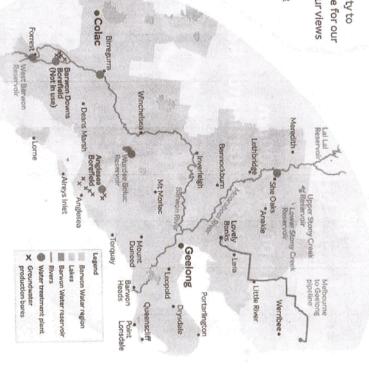
You can also meet us at a range of local community events.
The next ones are:
October 6, Festival of

October 17–20, Royal Geelong Show, Geelong Showgrounds. Sport at GMHBA Stadium

FOR OUR FUTURE

Have your say by visiting our website or coming to a local event.

www.barwonwater.vic.gov.au/future



5-10-2019,

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Barwon Water



AMENDMENT C87gpla – INVERLEIGH STRUCTURE PLAN SUBMISSION FORM

PLEASE PROVIDE YOUR DETRIES BELOW



PLEASE PROVIDE YOUR SUBMISSION BELOW

14 OCT 2019

I have outlined my areas of concern below:

Bush Fire Risk and Strategic Bush Fire Risk Assessment

Federids Management
Golden Plains Shire Council

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

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

Educational Facilities Impact

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

Retain Town Boundary

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

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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 output from the septic systems and their likely impact on the river should be done as part of the assessment and viability for this development to proceed. Data collection from Site CO_LEIO17 should be resumed ASAP to ensure data-driven insight in environmental changes and stormwater quality monitoring undertaken.

Sustainable development in Inverleigh

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

Diversity of lot size

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

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

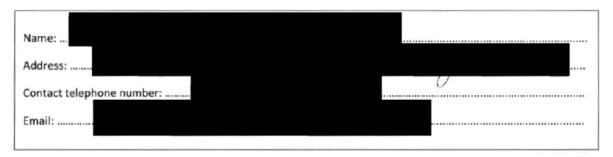
The Golden Plains Shire has not performed to a standard that instils any faith in its capacity or will to represent the Inverleigh community into the future which undermines the premise of Amendment C87 and the protections for the community. Supporting information includes 1) the quality of the Inverleigh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





AMENDMENT C87gpla – INVERLEIGH STRUCTURE PLAN SUBMISSION FORM

PLEASE PROVIDE YOUR DETAILS BELOW



PLEASE PROVIDE YOUR SUBMISSION BELOW:

We support the propose	al amendment
	Received
	1.4 OCT 2019
	Records in an again ent Colden Plains Shire Council

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*Please attach additional pages as necessary	



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@ enquiries@gplains.vic.gov.au

has worked with Council for many years on projects to benefit the community of Inverleigh and we submit the following for the draft Inverleigh Structure Plan.

We have also provided a number of community services and funded projects for over 40 years.

Growth.

Support moderate growth

Retain rural nature of the town.

Provide housing options with variety of block sizes to suit community. Currently older residents, particularly single must move away.

Education.

Plan for increase in primary school aged children now. School requires additional land. Population predominantly parents and homebuilders with school aged children.

Possible Solution: Move tennis courts to Sporting Complex as per management plan which has been in place for years. (Inverleigh Sporting Complex Redevelopment Master Plan, Final Report 2014). Council to submit for appropriate funding to do this in the near future. There is also land belonging to Anglican Church adjacent to school. Work with Redeal of Department.

Kindergarten. Again, anticipate more children. Put plans in place now. 1 4 OCT 2019

Infrastructure.

Records Management Colden Plains Shire Council

Support suggestion to extend water supply to residents further west of the town. Much of this lower lying land does not flood.

Sporting complex –Recreation important

Inverleigh Common. Possible permit system to collect fallen timber at certain times of year. Increase area of fire break.

Transport. Train line runs through town. Plan for more public transport.

Hamilton Highway is a major road to the west of Geelong. Work with Vicroads to improve surface and safety.

Remove Streetscape Master Plan from the current draft Structure Plan and include Works Plan

Environment.

Additional walking paths along rivers. North side of river - Section 86 committee and one volunteer does most of the work. South side - Council

Replace trees to west of town along highway with new varieties as they become senescent.

1

submission to the Inverleigh Structure Plan October 9th 2019

Bridges over Leigh River on Inverleigh Teesdale Road – repair / replace to take heavier vehicles up to 15 tonnes.

Maintain Federation Bridge as a pedestrian and cycling link from the north of the town.

Tourism.

Maintain the High Street as a welcoming and safe place for visitors with furniture and trees. Inverleigh is a popular town for car and cycle clubs, trucks and much passing traffic.



Secretary



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AMENDMENT C87gpla – INVERLEIGH STRUCTURE PLAN SUBMISSION FORM

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Name: .	
Address:	
Contact telephone number:	
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PLEASE PRODUCE FOUR SUBMISSION BELOW

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*Please attach additional pages as nece	essary	
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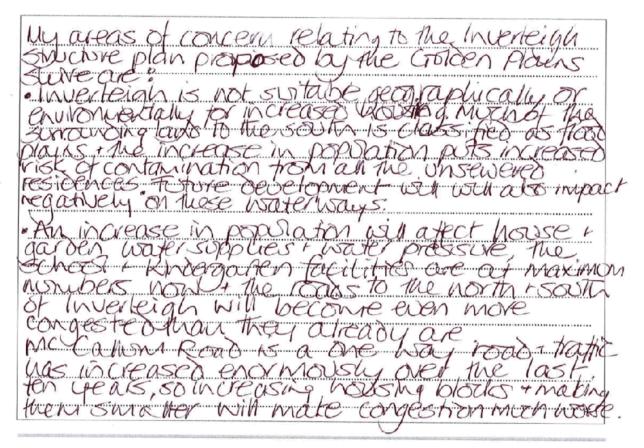


AMENDMENT C87gpla – INVERLEIGH STRUCTURE PLAN SUBMISSION FORM

PLÉASE PROVIDE YOUR DETAILS RELEWA

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Contact telephone number: . Email:	

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(C) goldenplains.vic.gov.au

(@) enquiries@gplains.vic.gov.au



· The town of Inverteigh will not retain
its present village atmosphere if it
The post office is already struggling is the amount of wail + internet
· Why to the slive want to become so
specify by increasing more works of
Please on not spoil Inverteials -
we all enjoy it as it is.

*Please attach additional pages as necessary



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Draft Inverleigh Structure Plan 2019
Submission from

35

Plan for moderate growth, not high

School and Kindergarten. Priority to plan now for extra children as development takes place. Council to liaise with Education Department as a matter of urgency to plan extra space for Primary School. Predominant population families with school aged children

Inverleigh Common. Work with relevant Victorian government department.

Enable permits to cut fallen timber at certain times of year. This would help with fuel reduction. Fire or the possibility worries the community. We have an active CFA and support from surrounding brigades, but any work to mitigate risk should be carefully considered.

Lot sizes. Enable variety of block sizes. Not everyone wants large blocks. Plan for some smaller units to enable older folk to remain in the town. Currently many have to move away

Water vital for life. Work with Barwon Water to provide water to west of town. This area could support some closer settlement with town water. Geelong is growing at a very fast rate and may not have enough water for the future. The Otways are the wettest area of Victoria. Some south flowing rivers could be dammed to supply water to the area, rather than using ground water. Pumping from underground bores is unsustainable.

Roads. Work with Vicroads to have the Hamilton Highway made an "A" road, rather than a "B" road. The traffic, particularly trucks, uses this road for fuel saving reasons.

Proposed Inverleigh Bio link for the future. Whilst this is a good idea, who will maintain this link? Plant the trees, weed control etc.

Follow Sporting Complex Management Plan and move tennis courts to the complex. Other towns have new courts, why not Inverleigh? This move has been on various plans for years.

Inverleigh is loved by its residents and visitors for its character. This includes the buildings, river paths, ambience and community. Any plan should aim to enhance these attributes.



Submission – Inverleigh Structure Plan

36

I accept that towns grow, but they need to grow with quality planning that firstly matches the interests of the existing residents, so that any future residents add positively to the community, not cause an 'us and them' division. That there is sufficient infrastructure planned as well, and growth does not cause detriment to the current vibe and feel of the town.

GP has rate payers who create its existence. Ratepayers pay its way and pay the wages. The duty and loyalty of GP must first, and foremost, be to the Inverleigh existing clients. If Inverleigh residents agree to 5 acre subdivisions instead of 1 acre subdivisions, then that's what GP tells the developer. You can have no loyalty to a developer unless there is corruption. So what if someone rich has purchased land they would like to do A, B or C on. Irrelevant. If I have to comply with your building rules and be unable to build what I want, then the developer must also do exactly as GP ask – and what GP ask is driven by GP existing clients. The future rate payers don't exist yet either, so there is no loyalty to them either. The care and concern and loyalty and decision making must be driven by the existing clients. And the Existing Clients do not agree with this amount of 1 acre lots. It's too dense. It's not in keeping with the existing surrounds. If this proposed developer wants 1 acre lots, let him go. Eventually a developer that does do what GP requires (driven by the existing clients) will turn up. In the meantime, GP can liaise appropriately with other stakeholders to ensure the primary school, kinder garten, water pressure, NBN services, all can meet an extra 70 - 100 families (not 300+). It is not for GP to pretend that they can just leave that to Barwon Water, Telstra, Vic Education etc. If other developments are planned communities - this one can be too.

- 1. No matter what size the blocks end up being, the main entrance to this proposed subdivision, is via the Hamilton Highway and NOT Common Road. The decision to put deep drains (that need constant maintenance so that silt and leaves and sticks don't block the concrete drains) means that every night, any vehicle could leave the road and end up in the drains. That's a death through mis-design. The town has a HIGHWAY with huge grass verges, which can be used for creating turning lanes. If the developer or GP needs to acquire another sliver of land, and build a bridge to access this proposed subdivision, or pay for significant upgrades (wider than Common Road) on the Teesdale Road and come in from that side so be it. If the developer wants to develop and there is no corruption in GP, the entrance into this development needs to be safe, from the Highway, and not affecting existing residents. Common Road can't cope with this traffic. Even when you fix the drains, the road is not a highway. We have a highway, lets use it.
- the trade-off could be that the developer does not need to pay for concrete footpaths. Gravel paths are fine. Lets get the developer to spend their money on the important stuff such as amenity, appropriate entrance, drainage.

- 3. The size of the blocks could range from 1 4 hectares and definitely not 1 acre. The lie of the land is towards the Leigh River and the more people that are using a toilet, the greater the amount of human waste will make its way into the river. That can't happen. And you can't pretend it won't, given your concerns when we put in a septic at 84 Savage Drive. Your office was terrified that septic would be on any part of the downhill slope towards the river and our expenditure was extreme to comply with ensuring all septic was on flat land. When we asked GP, the only options we were given were 2 types of septic in your brochure. You can't have 2 sets of rules without compensating existing residents.
- 4. If house blocks of maybe 850 1000sqm were for sale in town they would sell. Really quickly. It's just that there are not any for sale. People moving to a country town, don't always want a hectare (or an acre same argument). Some want ¼ acre. They don't know how to look after acreage, can't necessarily afford the equipment that goes with maintaining acreage (much more than to maintain a house block), don't realise it will cost \$5000 \$10,000 to fence, don't have appropriate fences for the unsuitable large pets they buy, and really they just want to be in a smaller and less busy or polluted place than Essendon (example). There is no point in having people with no knowledge of the land buying 1 acre or 1 hectare if they plant the wrong trees, don't maintain it, don't recognise serrated tussock, try and own a pony on an acre, work against the country appeal that the country developments are trying to create by their lack of knowledge. Let there be a choice of block sizes. I have no objection to blocks ranging between 1 4 hectares.
- 4a I also have no objection to there being a few more house blocks in the township area. Maybe 20. Definitely we can't turn Inverleigh into Bannockburn.
- The Common is a fire hazard. GP need to liaise with Parks Victoria and make sure it isn't a fire hazard before any development occurs. That might be by having Parks Vic allow people to gather fallen wood, as most homes have a coonara. If this takes 5 years for the Common to be safe, then it takes 5 years before any development is signed off. At this time, it is a duty for GP to ensure that any real estate For Sale sign specifies that if the Common goes up, no fire brigade will attend. People need to know this. They need to know it long before they apply for any permits. Long before they pay for the block (minimum 1 hectare up there). GP, and any Real Estate agent, and the developer have a duty of care to anyone buying anything across the road from the Common, to disclose that their home may burn and providing a safe exit (not Common Road, everyone already living there will be using that), to get away from the fire. This disclosure will also mean that probably the purchasers cannot insure their homes. The bigger the properties, the less risk of lives lost and property lossses. With bigger blocks, people will have paddocks (which in summer have little grass) whose distance helps reduce the risk of fire balls skipping from one gas bottle to the next. Clearly if gas bottles, electrical connections, homes and sheds are further apart, people are safer. This is about a duty of care to purchasers and not about pleasing a non existent developer to trick non existent residents (at this time).
- 6. GP would be actively discriminating against people wanting to own a horse (which is a herd animal, so there has to be 2), if blocks were not up to 5 acres in size. Again, I stress, I am OK with blocks of different sizes, so long as there is a

choice of sizes, up to 10 acres. Your own by-laws limit 4 sheep or 2 horses per 5 acres (2 hectares). So if a family has one mum and 2 daughters who want to ride, and one child grows out of her pony, you need a 10 acre block – on your rules. The most valuable members of this community include people who have horses, or had horses, or farmed or come from farming families. To now actively discriminate against this person, this lifestyle, this hobby by block size is contrary to the very fibre of this town. Again, you must have loyalty to this town, as GP exist because of it.

- Unless there are larger blocks up to 10 acres, GP risk purchasers who are city people, with no background in horses (or dogs, or sheep, or chooks etc) then putting animals on blocks that are too small and causing no end of difficulties to neighbors, GP, RSPCA, noise levels and manure issues. That won't occur if larger blocks - of the same size as exists elsewhere in this community, are part of the planning. Its no good sending your compliance staff to properties with inappropriate facilities, the wrong trees, the wrong amount of animals, manure smells, after the fact. Do not plan for rates you collect to be spent on compliance. If future rate projections are any part of this decision making (and it cannot be - your duty is to the existing rate payers who also want a minimum of 1 hectare), then forcing people to buy smaller blocks (rather than ensuring there is a choice), will be counter productive. You'll spend more on compliance and VCAT and Supreme Court and counter suits than you will bring in with rates. 1 extra compliance officer will cost you \$100K in wages, super, leave loadings, EAP and other staff costs. If rates for a town block or a 1 acre block are \$4000, you've just wasted rates income from 25 blocks. You may as well just have a choice of block sizes, include larger acreages, and break even.
- If I contract a painter to paint a room blue and he paints it yellow, I don't pay him. Nor do I pay him the extra costs he incurs to fix his error. I pay him for the service I asked for when it is delivered to my satisfaction. My understanding is that GP actually PAID the street scape company. They did not come up with a workable street scape, so why were they paid? To narrow a HIGHWAY to prevent FARM machinery, a key vehicle in the district, getting past is not 100% not a workable street scape. So go and get your money back. GP have a fiduciary duty to the ratepayers to absolutely and utterly ensure every dollar is spent in the best way possible. To consult with the community on what they want, not what GP want. Not what a developer wants. Do not pay for something that didn't meet the contract and then tell Common Road residents the open, dangerous drains were done through lack of funds. This is an opportunity to go through previous contracts and claw back any payments for incomplete services. It is also a time to ensure that every person in GP who approved the street scape as a 'workable' proposition to put to residents, and / or who approved payment, needs to be performance managed out of their employment. They cannot be meeting their performance criteria of having an understanding of the environment GP functions in. Anyone this out of touch with the town they are proposing to administer, needs to have no role in any future decision making.

As an aside, we moved to Inverleigh in 2018, after my husband's life long involvement with the town he grew up in and went to school in. We were planning to build, and were told repeatedly that we could not have storage on our block before the build. We were told that even a shipping container would prevent us getting any

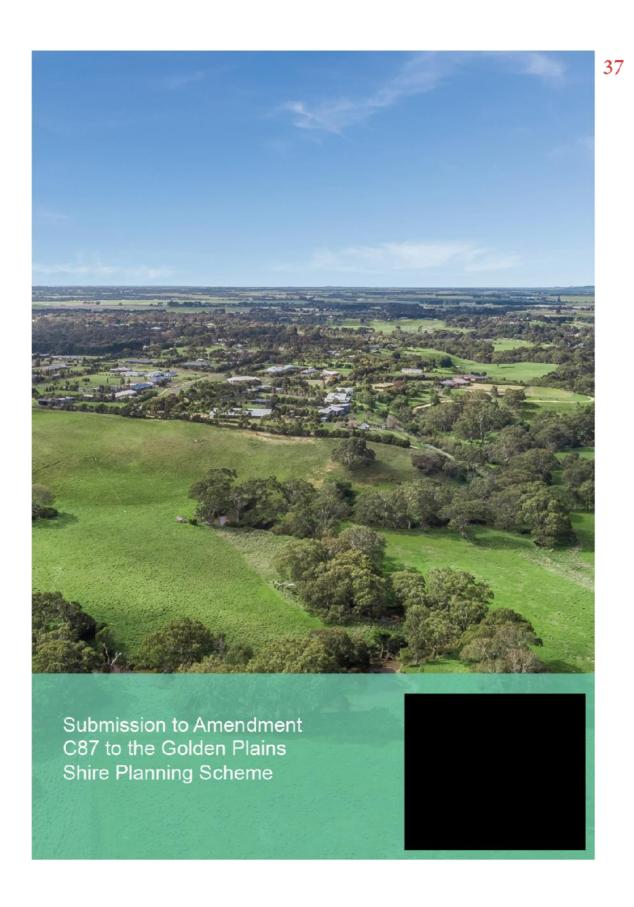
approvals. We offered to enter into agreements, pay bonds, about dates of build, dates of removal of containers, anything to help us store and access the equipment we need to fence, maintain and improve our block before and during the build, and were knocked back at every option. Later, we read the by-laws and the info provided was totally incorrect and the inconvenience and delays caused by not being able to start anything because we couldn't store fencing equipment, tractor, mower etc, cost us tens of thousands of dollars in delays, storeage elsewhere, agistment I had to pay because we couldn't fence our own block, the additional travel to get equipment from its storage location to Inverleigh, and then back again. We have not been compensated, had no offers of compensation, and no apology received. We then had the misfortune of having a neighbour, make a false complaint against us (probably because we had to store items on the block untidily because you refused to allow us any containers, sheds etc). Incredibly GP acted on a false complaint as if it were true. the compliance officer, (did he even have a background in compliance?) didn't check his facts or even ask our side of the story before he acted. That created an insane amount of hours by both me and GP damage. Thankfully I found other GP staff who had ethics. understood their job and who offered us an apology and restored the status quo, but not without us suffering significant detriment first.

The building process involved meeting GP staff who were incompetent and obstructive, and then others who were really fantastic and went over and above to make things happen and undo their collegue's incorrect advise or decisions, so all up the experience of building was neutral to good. So our starting point with GP has been difficult.

However, Inverleigh is a wonderful community.

Please do not destroy the fibre and vibe of our town. Personally, we are OK with it growing a little, but it needs to grow with planning, in the interests of existing residents, and in keeping with the current block sizes and lifestyle choices that attracted the lovely residents to Inverleigh in the first instance. Any change to that will change the town, and that is not something GP should do to us, if we don't want it. GP is our agent, our representative, is paid by us and therefore beholden to us. The interests of a developer come last.

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Submission in Response to Amendment C87 to the Golden Plains Shire Planning Scheme.

together with its partners who live within the Shire of Golden Plains welcome the opportunity to provide a response and statement of broad support for the Inverleigh Structure Plan (the Structure Plan), Amendment C87 (the Amendment) and for the supporting controls outlined in the Amendment documents.

The Structure Plan and the Amendment are of critical importance to the existing and future communities of Inverleigh, striking a balance between sustainable growth that enables Council to meet population demands while protecting the integrity of the local township. Reducing minimum residential density standards as proposed is one of the most effective tools to balance growth pressure against undesirable urban sprawl by ensuring a sustainable supply of residential land within existing township boundaries.

We strongly support Council's proposal to adopt a density of one dwelling per 0.4 hectare (ha) within areas identified as Low Density Residential Zone. The 0.4 ha residential density approach brings future development within the Inverleigh township in line with standard State Government controls and provides a consistent approach across the Golden Plains Shire, including development within Bannockburn, Batesford and Teesdale.

The reduced residential density as proposed, will be supported by upgraded local infrastructure, such as bridle and walking paths, improvements to the environment and upgraded roads and intersections to ensure that the community benefits from the changes.

This approach is critical to the sustainable planning of Inverleigh due to the known population pressure experienced over the past 10 years. are aware that from 2008 to 2015, an average of 15 new homes per year were developed within the township and surrounds. [Source: Barwon Water new water connections]. This figure only reduced to 1.6 dwellings from 2015 primarily due to the lack of greenfield land available. As a measure of existing demand, since 2015, has received over 180 enquiries for purchasers looking for land in Inverleigh.

If the 2008-2015 trend was to continue under the current controls of 1 dwelling per ha, we have estimated that land supply within the Inverleigh township will run out within 3-5 years.

Reducing lot dimensions to a minimum of 0.4 ha as proposed and, assuming a continued modest demand for development within the identified growth areas, land supply within Inverleigh can be maintained for the next 8 to 12 years.

Our team recognises the significant and unique role that it has in the delivery of the Structure Plan and the importance of working in partnership with Government, other landowners and local residents to bring the communities to life.



Combined, the Amendment and the Structure Plan document provide a sound basis to guide the future development of the design and development of streetscapes, upgrades to walking, bridle paths and road infrastructure to accommodate new residents and provide for improved liveability for existing residents.

We strongly support the Amendment. However, we have identified six (6) priority areas that we seek Council support to strengthen the proposed controls to enable the effective delivery of the vision.

This submission includes:

Part 1 – Who is

Part 2 - Six (6) priority areas and recommendations

Part 3 - Conclusion

PART 1 - WHO WE ARE

are a Bellarine based, family owned company. We specialise in rezoning and subdividing farmland into residential land and have been developing land since 1983.

are involved in all aspects of planning from the ground up: rezoning to residential, commercial, industrial and change of use; we take projects from subdivision to sales of individual lots.

We believe in the land, in giving back to the communities in which we work and in creating happy and sustainable family neighbourhoods. Many of our developments have generations of families living side by side.

We work in close collaboration with Council and statutory partners. Trust, transparency and a commitment to do better for the communities we serve guides our vision.

We hold a deep respect for this history and heritage of this area and understand that transforming farming land into residential developments is a privilege, one that can challenge landowners and communities alike. We partner with our landowners, some of whom the land has been in their family for over 100 years, we share the development journey to maximise their legacy and return.

has been working in close collaboration with Golden Plains Shire since 1995. Our first development in Golden Plains Shire was the Dog Rocks Estate, described by the 2001 Batesford Structure Plan as "a distinctive feature of Batesford." Since that time, we have completed a number of estates across Batesford, Bannockburn and Inverleigh including the Riverstone Estate, Glenmore Estate, Willowbrae Estate, Mannagum Estate and Barrabool Views. We are proud of our work which respects the beautiful natural environment of the region and compliments it by our landscape design treatments, planting and lighting.

works collaboratively with farmers and landowners and represents landholdings in all of Growth Area 2 and 3, part of Growth Area 1 and land between Growth Area 1 & Growth Area 2. [Attachment 1 - land ownership map].



PART 2 - PRIORITIES

Priority 1 – Amend schedule 9 to the Development Plan Overlay to support Council's Vision to adopt a residential density of 0.4 hectares

We strongly support Council's position to increase density within the Shire by consolidating population growth within the existing land supply of the Inverleigh town boundary. In particular, we strongly support the application of a minimum density of 0.4 hectare, by the deletion the existing schedule to Clause 32.03 Low Density Residential Zone (LDRZ) and reverting to the State Government standard, as per Council's documentation.

Maintaining the integrity of the township centre and supporting a local and contained community heart will ensure that population growth demand can be accommodated within Inverleigh, without resulting in undesirable sprawl of residential development.

To effectively deliver this Vision, in addition to the removal of the existing schedule to the LDRZ, other minor changes to the planning scheme will be required. Specifically, this includes a minor amendment to Schedule 9 to Clause 43.04 Development Plan Overlay (DPO).

Schedule 9 to the DPO schedule applies to land within the 'Barrabool Views Low Density Residential Development' area and sits between Growth Area 1 and Growth Area 2 within the Inverleigh Structure Plan. The schedule currently includes a condition that land adjoining the Hopes Plain Road must be developed with a minimum lot size of 2 ha, which is an anomaly previously derived from the 2005 Structure Plan, and inconsistent with the overarching objective of the 2019 Structure Plan and Amendment.

Recommendation:

To bring the relevant Golden Plains planning scheme controls in line with Vision set out in the Structure Plan and Amendment, include the following change to the proposed Amendment C87 controls.

At dot point 11 of Schedule 9 to Clause 43.04 Development Plan Overlay, replace the existing condition:

"land adjoining the Crown Land compromising the Inverleigh Nature Consideration Reserve
and Inverleigh Golf Course and the land adjoining Hopes Plan Road must be developed with
minimum lot sizes of 2 ha.

With the following condition:

 "land adjoining the Crown Land compromising the Inverleigh Nature Consideration Reserve and Inverleigh Golf Course and the land adjoining Hopes Plan Road must be developed with minimum lot sizes of 0.4 ha."

Priority 2 - Vehicular Movement

recognises that vehicular traffic increase arising from the population growth in Inverleigh should be managed to protect the liveability of residents of Inverleigh.

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Section 5.3.2 of the Structure Plan addresses Movement and includes recommendations around vehicular and road upgrades that will be required to support the proposed residential growth within Inverleigh. understand its obligations and commits to making an equitable funding contribution to Council and Transport for Victoria (TfV) requirements for:

- Upgrade to the intersection of the Hamilton Highway and Common Road.
- Upgrade to the intersection of the Hamilton Highway and Hopes Plains Road
- Lighting at the commons Road / Hamilton Highway and
- Pedestrian and cycling paths.

It is position however, that there is insufficient justification to require the development of Growth Area 3 to upgrade or replace the Twin Bridges at Teasdale Inverleigh Road to a 15 tonne capacity to support access by emergency vehicles (refer page 62 of the Structure Plan). suggests that this infrastructure is a State Government responsibility and should form part of an advocacy position to State Government for the following reasons:

- The beneficiaries of the upgrades to the Twin bridges at Teasdale Road will primarily be state
 government agencies (CFA) and surrounding farmers and landowners, rather that the future
 residents of Growth Area 3.
- Requiring the relatively small number of residential dwellings proposed as part of the full build
 out of Growth Area 3, to fund the upgrade of the Twin Bridges will make the practical
 subdivision of Growth Area 3 cost prohibitive.

Recommendations:

- Amend page 62 of the Inverleigh Structure Plan to clarify that upgrades to the Twin Bridges form part of an advocacy position to State Government, rather than a developer responsibility.
- Provide a justifiable nexus between all developable land and significant costs associated with essential infrastructure upgrades.

Priority 3 – Deletion of dimensions associated with the proposed bio- link (Refer Section 5.6 of the Inverleigh Structure Plan)

Section 5.6 of the Inverleigh Structure Plan outlines the significant natural environmental, flooding and open space complexities within the Inverleigh township precinct.

fully supports the commitment in the Structure Plan and the Amendment to maintain and enhance the natural environment of Inverleigh by providing habitat and vegetation links throughout and beyond the township zone.

However, we have concerns that specifying dimensions for the 60 m wide bio-link from the Flora Reserve to the Leigh River (Sections 5.6 and 7 of the Inverleigh Structure Plan) fails to provide the flexibility that is likely to be required during detailed design of the Bio-link.

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We seek minor changes to this section of the Structure Plan to include an objective based outcome for the bio-link, rather than a prescriptive based approach.

Recommendations:

Amend sections 5.6 and 7 of the Structure Plan to delete reference to dimensions of the 60 m wide bio-link corridor from Flora Reserve to the Leigh River and instead include an **objective based approach** to the design of the bio-link, which could include the following outcomes:

- Increased planting
- Provision of an adequate habitat and wildlife corridor
- Provision of a pedestrian link
- · Provision for emergency vehicles access (if required).

Priority 4 – Infrastructure Funding

accepts its obligations in regard to contributing to essential infrastructure as part of the development of the township and agrees that essential infrastructure should be provided to coincide with the need for the identified infrastructure. This includes the upgrades to pedestrian, cycling and bridle paths, natural habitat links and road infrastructure.

To provide certainty to developers and the broader community, we recommend that further work be done to identify the need, funding arrangement and delivery timing of all of infrastructure set out in the Structure Plan.

supports a shared cost mechanism and equitable funding arrangement to achieve this however, we note that the Structure Plan does not provide a basis for the proposed cost sharing arrangements.

To provide confidence to all parties, we suggest that the Structure Plan include specific direction on this matter, in particular providing clarity that development contributions be applied on a 'developable area or per ha basis' in each of the growth areas.

Furthermore, we request that developers should not be required to fund any infrastructure that is identified as being a State Government responsibility, such as the upgrade of the Twin Bridge.

Recommendations:

- That Council provide certainty to landowners, community and other stakeholders, by amending section 7 of the Structure Plan to include a direction that development contributions:
 - o be applied on a development area or per ha basis (as appropriate)
 - development contributions be shared by all landowners within each of the individual identified growth area, specifically stating that contributions be applied 'growth area by growth area'

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