



- The Structure Plan be amended to clarify that State Government infrastructure must not be funded by developers if a justifiable nexus for that infrastructure cannot be identified – this includes the upgrade to the Twin Bridges at Teesdale and Inverleigh Road to accommodate 15 tonne vehicles for the benefit of the CFA.

Priority 5 – Subdivision and Development Sequencing

We note that there are 6 growth areas identified within the Structure Plan. It is our understanding, that the numbering of the growth areas does not represent delivery staging, nor are we aware of any significant benefits of adopting a staged delivery approach to the growth areas. To avoid future confusion or complications we suggest a simple amendment to the Structure Plan that clarifies this matter.

Recommendation:

That Section 7 of the Structure Plan include a clear statement, that, to avoid confusion, Growth Area numbers identified in the Structure Plan do not represent Council's preferred or recommended development sequencing or delivery.

Priority 6 – Changes to Proposed Clause 21.07- 5

Proposed amendments to clause 21.07-5 sets out objectives to support and encourage appropriate residential growth within the existing township zone, protect and enhance open space and the natural environment, provide for appropriate pedestrian, cycling and road access and infrastructure and encourage continued and sustained economic development through a range of strategies

This clause includes Figure 21.07-5A [the Map] that is a graphic representation of many of the outcomes sought within the Inverleigh Structure plan and the Amendment documents.

Specifically, we seek changes to the Map in order to reflect many of the outcomes that we are seeking in Priorities 1-5 of this submission.

Recommendations:

For the reasons outlined in Priorities 1-5 of this submission we seek the following 4 changes to the proposed Inverleigh Framework Plan map at clause 21.07-5.

1. In the Drawing Key under "Bridle Path / township loop" add: "*indicative only*".
2. In the Drawing Key under "Proposed pedestrian access" add: "*indicative only*".
3. In the Drawing Key under "Bio-link" add: "*indicative only, final location subject to detailed design*".
4. In the Drawing Key under "Proposed green link" add: "*indicative only*"



PART 3 - CONCLUSION

We acknowledge that the Structure Plan and the Amendment documents embodies Council's vision for the Inverleigh township. We fully support the proposed approach to increase density within the existing township boundaries, supporting upgrades to traffic, pedestrian and recreational movements within the precinct, protecting the natural environment and supporting local business and the economy.

We commend Council on the work, detail and extensive consultation it undertook as part of the Inverleigh Structure Plan.

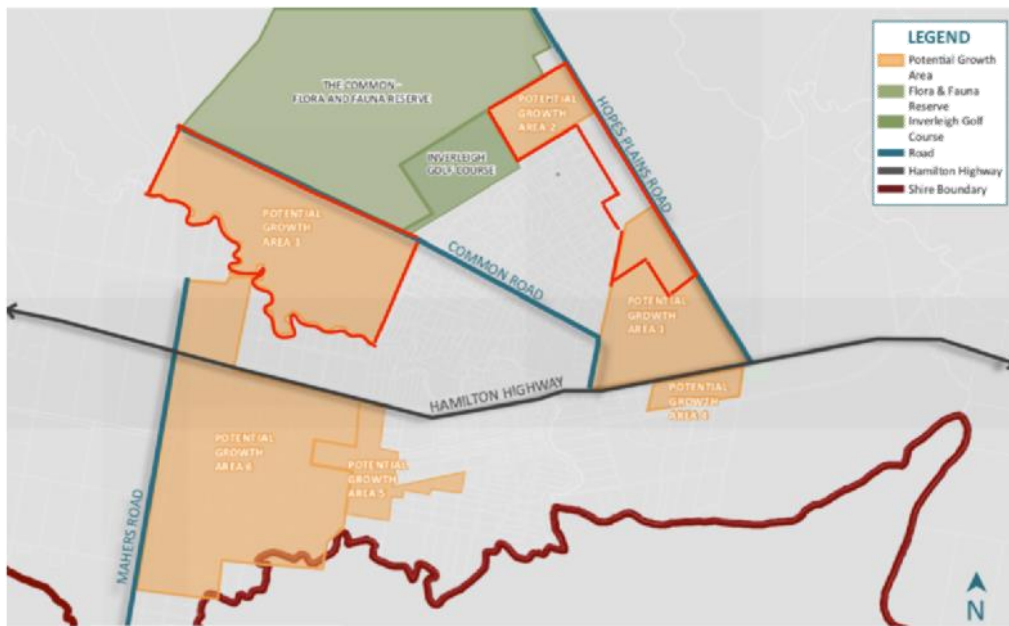
We have identified six (6) priority areas, that we being should be adopted in order to provide confidence that the Inverleigh Structure Plan can be delivered and achieved in accordance with the Structure Plan's overarching vision.

Our group commits to working closely with Council, Government and other stakeholders and reserves it's right to be represented, hearing and call experts at the upcoming Panel Hearing.

We also reserve our rights to make further comments and submissions on other items following a review of Council and other interested parties' submissions to Amendment C87.



ATTACHMENT 1 – LANDOWNERSHIP MAP



 land is marked in orange



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:

I hate the structure plan because the school simply doesn't have the space for the potential hundreds of extra children that are coming to the school. Me and my family have even speculated that your unsaid motto is profit over people because honestly most of the people who live in inverleigh came to live here because its nice and rural and what you dumbasses are proposing is going to turn us as a shire into a second geelong which by the way no one wants. You stupid council people have no idea what the roads will turn into there going to be heaps of potholes covering common road and guess whos going to have to fix it you guys and judging by your past decisions I think that isn't what you cash hoarders want. In summary of that I think you guys should just think about something with your fucking brains you fuckwits.

Now theres also fire risk because guess what its Australia and oh no traffic jam whats that people suffocating from smoke because they cant evacuate. Oh heres some more news for you fuckwits one of your plans says drive into the fucking reserve which is basically you dickheads telling us to commit suicide wow think about that bitches honestly no one wants to live in a place where they tell you to commit bloody suicide by driving into a roaring bushfire.

In final summary you are all arrogant fucked up dickheads who some how got entrusted with running the shire which basically means you are al fat lazy inconsiderate money hoarding fucked up unloved stupid dickheads and fuckwits who cant think for themselves unless it gets them a fuckton of money.

Yours sincerely [REDACTED]

Potable water and unsewered lots.

The current water supply to Inverleigh is less than satisfactory with loss of pressure being experienced already by many during peak times. The existing supply coming via a route from travelling North to Lal Lal, then back south again via Teesdale to Inverleigh cannot sustain any future growth without serious improvement. The wettest part of Victoria to our south west (Otways area) must be seriously considered as a major supply of fresh water for future growth. The current "add on improvements" to current supply chains will ultimately fail to meet demand. If Victoria in general and Inverleigh in particular are to maintain current population growth and expansion, fresh water must be at the head of the list as without it we cannot sustain life at all

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

Planning of water supply to the area west of Phillips road is urgently needed as current water supply mains end at the Cemetery and current properties in the area exist on tank water only. Water supply to this area of high ground would sustain improvement for development sooner rather than later.

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.

Infrastructure for education. The existing Primary School is currently close to capacity and it is very important that provision of land is set aside for future development of this school. Logically, the land currently in use as tennis courts and the area to the west needs to be procured for future growth. Any proposal for a second independent campus may have merit but planning for both needs to be addressed now and not left until residents have to transport their children elsewhere for education.

Diversity of lot sizes and access of them.

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.

I feel that many new residents to rural townships like Inverleigh come for a life style and many think that equates to having more land. In practice, this may be the dream, but the reality is that most don't know how to manage 1 hectare and above. Lots of 0.4 hectares are probably the best, except for those with definite plans for horse's etc who would need the larger lots. My concern is not the 0.4 hectare lots, but the access to them. To apply the same principles to rural subdivisions as are currently being developed for the typical town subdivisions (Bannockburn, Armstrong Creek and the like) is a mistake. Access to larger properties require wider roads and verges, multiple subdivision access points. Access roads of minimum width restrict everyday vehicle use, not to mention emergency vehicle access when needed. Subdivision of many blocks tightly packed together with roof guttering almost touching the neighbours results in communities at high stress levels and the obvious result of poor neighbourhood's declining to the lowest degree of human behaviour and interaction.

Sustainability of small scale agricultural business and associated support trades.

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.

The planning of a "Support Business Park Area" is required so that these support trades have a suitable and accessible area, most probably on the town fringe. Planning for the necessary infrastructure (Water, Electricity, Communications, Roads etc) must be a the forefront of any planning.

Golden Plains Shire Council.

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.

The Hamilton Highway access to Geelong.

The existing 2 way road between Inverleigh and Geelong is experiencing increases in traffic flow in all types of transportation, from light personal use to very large and heavy transport use. Already, at peak times access to Geelong is bottlenecked at the ring road and back and will get worse with every additional development in Inverleigh, Bannockburn, Teesdale and beyond. Heavy transport prefers to use the Hamilton highway because of its basically flat terrain from the ring road to western and southwestern Victoria. Much of the road between Inverleigh and Geelong has minimal opportunity to pass (I have travelled this road 6 days a week for in excess of 20 years) with many motorists blatantly disregarding double lines and passing at great risk to themselves and others. Some passing lanes need to be urgently installed and the overall widening of the highway planned for in the very near future.

Overall there is great potential for the Area covered by the Inverleigh Structure Plan but there needs to be major changes in thinking and approach to future development of the area. Resident are here for what they see and like and want to become part of.

Leaving the development decisions to be made by bureaucrats and developers solely will result in further ill feeling between residents who live here and bureaucracy.

I trust that this submission will be appropriately considered and added to the others submitted by residents concerned for our future for the next 15 years and beyond.



I am opposed to elements of Amendment C87 to the Golden Plains Planning Scheme as it does not demonstrate adequate provisions for bush fire risk management, including the management of the Inverleigh Flora and Fauna Reserve, the provision of adequate infrastructure, and egress for current and future residents in the event of a fire in the Common.

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The Inverleigh structure plan states that under 3.8 State Planning Policy Clause 13.02 – Bushfire that the proposals for residential growth in Inverleigh are appropriate from a bushfire risk perspective, provided measures indicated in the Assessment are taken to minimise risk to residents based and emergency services. The ‘measures’ including plans, timeframes and distribution of responsibility for planning, budgeting and execution across Golden Plains Shire, DELWP, Parks Victoria and the developer are not detailed in the Inverleigh Structure Plan or Amendment C87, making policing and enforcement impossible. I also believe that the bush fire risk for the Common is underestimated, with arguments detailed below. This underestimation has significant follow-on effects on the assessment of growth area 3 as ‘appropriate’ for development. Lastly, despite the *State Bushfire Plan 2014* conclusion that “the bushfire risk in Victoria is increasing”, the Inverleigh Structure Plan and Amendment C87 fail to include measures to counteract this increasing risk.

Fire risk in The Common - Inverleigh Flora and Fauna Reserve

The Fire Risk in the Inverleigh Flora and Fauna Reserve is managed by DELWP/PV, with fuel reduction burns conducted in 2006, 2009, 2010 and 2015. Mistakes made during the 2009 fuel reduction burn left a legacy of dead, dry timber. With the exception of the 2009 burn which covered approximately 13% of the reserve, other burns covered <5% of the area. The 2009 Victorian Bushfire Royal Commission Report proposes an annual rolling target of a minimum of 5 % of public land (2009 Victorian Bushfire Royal Commission Report, Final Report Summary). This minimum of 5% is conservative, and below the scientifically determined effective fuel reduction burning of 10-15% (Packham, 2010, Some observations on the effectiveness of fuel reduction burning in Southern Australia). The importance of fuel management also underpins the residual risk assessment done for the West Central district by DELWP¹. The sparse fuel reduction burns up to 2015, followed by its abandoning, illustrate that the management of the Common has fallen short of the recommended fuel reduction burn targets, and hence fails to consider protecting human life at the highest priority. Taking the risk prediction information provided by DELWP, this lack in fuel removal will have significantly increased the fire risk¹.

The Strategic Bushfire Risk Assessment underpinning the Inverleigh Structure Plan fails to indicate fuel reduction burns are significantly behind target. The Safer Together website indicates the rapid increase in bushfire risk when fuel is not removed, as 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 township.

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>

Acacia Paradoxa

The Common contains Acacia 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 Acacia Paradoxa. No details are provided on the amount of Acacia 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 Acacia 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, Acacia Paradoxa management provides 7 hits, none in relation with bushfire management) also failed to reveal any evidence that removal of Acacia Paradoxa is a bush fire mitigation risk. Documents agree Acacia Paradoxa should be avoided in a bush fire resilient gardens (see for example^{4,5}) and that removal is the best Acacia Paradoxa management strategy⁶. Concerns remain that the selective removal of Acacia 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 Inverleigh Structure Plan is therefore not valid, undermining the technical validity of the document.

Track Maintenance

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.

Climate change

Despite the *State Bushfire Plan 2014* conclusion that “the bushfire risk in Victoria is increasing”, the Inverleigh 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. Lightning is the major cause of bush fire, and considering historic data shows a bush fire in the Common was caused by lightning, 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](https://doi.org/10.1111/j.1472-4642.2011.00809.x)

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

Population Density

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.

Egress

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-western 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 Inverleigh'⁹.

It is unclear if the Hamilton Highway will allow for safe and orderly evacuation, particularly under poor visibility conditions. Additionally, no provisions are made in Amendment C87 for the development of a refuge in Inverleigh 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 those that do not impose additional risk on life and property.

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?pagelid=publicDisplayDoc&fname=2017/CIG-BSW-Inverleigh-3_00_78605.pdf

Structure Plan Submission – Diversity of lot size

Summary

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.

Submission

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.

The Structure Plan states “...State Planning Policy requires Council to ensure a sufficient supply of urban land is available.....to accommodate projected population growth over at least a 15 year period....” The Structure Plan fails to explain, as per Clause 11.02-1S of the Victorian Planning Scheme, that the “residential land supply will be considered on a municipal basis, rather than a town-by-town basis”. As the requirement for residential land is across the whole of the Golden Plains Shire there is no *requirement* for Inverleigh specifically to have 430 lots available, much less: the 525 proposed through Potential Growth Areas 1, 2 and 3; the unquantified but potential for hundreds of lots through Potential Growth Areas 4, 5 and 6; and the potential for many more lots should current land owners subdivide, given Amendment C87GPLA proposes to decrease the minimum lot size to 0.4ha.

In the Structure Plan a Residential Development Principle notes “Residential development will continue to incorporate the existing landscape as a design objective through maximising the retention of landscape features such as trees, ridgelines and waterways and using larger lots *where necessary* to achieve this outcome”. “Where necessary” implies the default will be to have lots of the minimum allowable size (0.4 ha) and it will only be by exception that a lot will be larger than 0.4ha. Yet the correlating Residential Development Strategy notes “Plan for new residential development to provide a diverse range of lot sizes which reflects the country lifestyle character of Inverleigh and responds to site conditions”. The Principle and the Strategy do not align; one plans for a diverse range of lot sizes, the other only allows a variation from the minimum lot size by exception.

As noted in the Structure Plan and from the Inverleigh Structure Plan 2017 Community Survey (Attachment 1) there are a variety of views on lots sizes; “...some residents want to subdivide because they don’t want to manage large lots, others want to retain the 1 ha minimum lot size” and 53% of residents do not want greenfield development (37% No development + 16% Infill development (only). Furthermore since the 2005 Inverleigh Structure Plan the community still “...wants to retain the values and character that make Inverleigh popular”, one element being the option of larger lot sizes.

To consolidate the above points I believe the Structure Plan must be updated to include an additional Residential Development Strategy; it would read “At the development planning permit stage the Council will advocate on behalf of the Inverleigh community for, and ensure, diversity of lot size”.

This proposal would: allow for actual diversity in lot size; it would show that the Council has listened to the community and is genuinely attempting to “maintain Inverleigh’s rural village atmosphere” vs succumbing to pressure from developers (who have no interest in the towns’ values and vision), and it would be a compromise between “old” (1-2ha minimum) and “new” (0.4ha minimum). The Council has the powers and is able to make the *choice* to have larger block sizes, as 0.4ha is the minimum for un-sewered LDRZ; it is not the required size nor is it the only allowable size.

Structure Plan Submission – Educational Facilities Impact

I am opposed to elements of Amendment C87 to the Golden Plains Planning Scheme as it does not demonstrate sustainable development by providing adequate infrastructure and services, specifically in relation to the educational facilities in Inverleigh.

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; nor the demand new families will place on the Kindergarten.

The 2018 Inverleigh Primary School Annual Report states "There are 10 classrooms, accommodating our current school enrolment of 212 students. Most classrooms are grouped in composite grade level communities, with collaboration spaces, and connecting decks. The average class size in Grades 3 to 6 is 23 students. In Grades 1 & 2 the average class size is 21 students. The Prep students are housed in the Mod 5 building with two classes of 15 students. An additional classroom was added this year to accommodate the growing student population and to reduce class sizes across the school, as this had been identified as a priority. Smaller class sizes allow classroom teachers to differentiate effectively to meet the needs of all students."

Data provided by the Victorian Department of Education and Training for 2018 shows the average All Primary Class size is 22.2 students; the average for Prep is 19.4 students; the average for Years 1 & 2 is 21.2 students and the average for Years 3 to 6 is 23.4 students (Attachment 1).

Pleasingly, Inverleigh Primary School currently has slightly smaller than average class sizes, which the School has specifically identified as important, however I am concerned that this will change for the worse, if the Structure Plan is implemented.

Whilst the Structure Plan outlines that at least 430 houses are required in Inverleigh in the next 15 years, 525 lots are proposed to be built on Future Growth Areas 1, 2 and 3 alone. The additional number of houses proposed for Future Growth Areas 4, 5 and 6 is not quantified and could easily run into the hundreds given the land area of these sites.

The Structure Plan states that in 2016, 45% of household in Inverleigh were couples with children and a further 7% were single parent families with children"; over 50% of houses in Inverleigh currently have children. The Structure Plan states that "...the most common household type moving into the township 2006-2016 was couples with children...", furthermore "in 2016, the households with children (couple or single parent) were predominately young families: 57% had young children (under 15 years)...."

Based on the above figures, at least 50% of the 430 new households (215) will have children and 57% of these will be "young" children (123). 123 divided by 15 (to account for the age range), multiplied by 8 (children are at primary school between the ages of 5 and 12) equals 66 students. At an absolute minimum (given these calculations assume only a single child per household, and are only based on the number of houses "required" in Inverleigh vs the number of households the Structure Plan proposes to make available for development), there will be an 66 additional children (30% increase) or an additional three classrooms worth of children wanting to attend Inverleigh Primary School, yet there are no definitive provisions made to accommodate them. Should families move to Inverleigh and have two children, numbers of children wishing to attend the Primary School could increase by up to 60%.

The Structure Plan states that even though the school is relatively constrained in terms of enabling growth, there are no plans to relocate the Primary School. The School and Council have been working with the neighbouring Church regarding land for expansion and additional portables but the Structure Plan does not confirm anything from these discussions.

"Additional land would be available with the relocation of the tennis courts to the Inverleigh Recreation Reserve" yet "The relocation is hampered by the cost of providing new tennis courts and a lack of funding opportunities

for tennis facilities.” Further in the Structure Plan it states that “Continued moderate growth of the town will generate a requirement for a wide range of local infrastructure including...potential relocation of the tennis courts...”, yet in the next paragraph under the heading “List of infrastructure upgrades required for the continued growth of the township: ...Relocation of the tennis courts to the recreation reserve”. The Structure Plan is contradictory and needs to be amended to clarify the Council’s position in relation to the tennis courts and thus the availability (or not) of additional space at the current School location.

The Structure Plan states that “The School Woodlot, located on McCallum Road and Railway Street....provides opportunity for expansion of the school, if required”. This option implies that if the school ran out of space at its current location, which it will if the tennis courts are not relocated or the Church does not give up land, the School will “expand” and operate over two campuses; one in the current location, the other on McCallum Road. If the Primary School was to operate over two campuses this would create a multitude of issues to the detriment of the families in Inverleigh.

Assuming campuses would be split by year group, the children would not have the same experience as other children in a Prep to Year 6 primary school; it’s likely they’d be the only government schooled children in regional Victoria in this situation. Younger and older children, including siblings, would not be able to support, learn and play with each other. Children would likely need to move between the campuses meaning they would need to cross the Hamilton Highway and a train line with no barriers. The administration and staffing costs of running two campuses would be higher.

Alternatively “expand” the school could mean relocate completely to the new site; this would come with equally significant concerns, namely the cost of building a new school and the loss of history if the current school building was no longer our school.

A further pressure compounding the schools’ limited space is that should the Kindergarten run out of space, the long-term option is to co-locate with the Primary School.

The community survey from March 2017 identified that at least 72% of Inverleigh residents work in Geelong or Melbourne. Inverleigh currently offers 4 year old kinder, 9am – 2pm, three days a week; Teesdale offer this program as well as a condensed version over 2 days, 8:30am – 4:00pm. The shorter day program is not a practical option for many families if having to travel to and from Geelong or Melbourne for work. I am confident the demand for 4 year old Kinder services in Inverleigh would increase if there was a longer day option; parents at present do not have this option in Inverleigh, have to find services elsewhere and thus the demand from *current* Inverleigh families for services in Inverleigh are not accurately captured, let alone the demand *future* families will generate. If the right services are offered I am confident that they will be utilised, and with the amount of development proposed it’s not a question of if the Kinder will run out of space, but when, and “when” will now be sooner than first thought...

In addition to the demand current and future families will place on the Kinder for four-year old services, is the recent announcement by the Victorian Government that it will be investing \$5 million over ten years to introduce kindergarten for three-year old children (Attachment 2). The three-year old funded kindergarten will become available in stages and in 2022 families in the Golden Plains Shire will have access to up to 5 hours, increasing to 15 hours per week by 2029.

If the Kinder did not co-locate with the school and used the Public Hall instead, as has been proposed as an option in the Structure Plan, this would also raise major concerns. The Hall would need significant financial investment to build anything resembling a Kindergarten to make it a safe, comfortable and engaging place of learning for our youngest residents.

The concerns identified in relation to the educational facilities can be resolved, and their detrimental impact to Inverleigh avoided, yet the Structure Plan fails to do so.

One option is to reduce the volume of development proposed, to lessen the growth and burden on Inverleigh’s resources. The Structure Plan states “...State Planning Policy requires Council to ensure a sufficient supply of urban land is available.....to accommodate projected population growth over at least a 15 year period....” The

Structure Plan fails to explain, as per Clause 11.02-15 of the Victorian Planning Scheme, that the “residential land supply will be considered on a municipal basis, rather than a town-by-town basis”. As the requirement for residential land is across the whole of the Golden Plains Shire there is no *requirement* for Inverleigh specifically to have 430 lots available, much less: the 525 proposed through Potential Growth Areas 1, 2 and 3; the unquantified but potential for hundreds of lots through Potential Growth Areas 4, 5 and 6; and the potential for many more lots should current land owners subdivide given the Structure Plan proposes to decrease the minimum lot size to 0.4ha.

The volume of development could be reduced by mandating a variety in the lot sizes; 0.4ha – 4ha. The Structure Plan does include the following strategy “Plan for new residential developments to provide a diverse range of lot sizes which reflects the country lifestyle character of Inverleigh and responds to site conditions”, which is excellent, however nothing in the Plan reflects that there will actually be any variety in lot size and I have no confidence the Council will enforce this given one of the reasons for the review of the Structure Plan 2005 is the “...increasing pressure from developers for rezoning...”.

If the volume of development is not reduced significantly by having a variety of lot sizes mandated in greenfield sites, the Structure Plan must be amended to detail an absolute commitment to:

- 1a) fund the relocation of the tennis courts and building of new tennis facilities or,
- 1b) fund the building of a new Primary School, Prep to Grade 6, at McCallum Road site; and
- 2a) fund the physical expansion of the Kindergarten at the current site to offer desired (long sessions over two days as well as short day sessions over three days) and required (three year old and four-year old kinder) services or,
- 2b) fund the building of a new Kindergarten at the Public Hall grounds or co-located with the Primary School.

Furthermore, the Structure Plan must be amended to detail where the funding is coming from; Developer or Council.

The current Developer Responsibility “Contributing community and development infrastructure, either by a Section 173 agreement at rezoning, or through a Development Contribution Plan” is the only Developer Responsibility that *might* require a developer to contribute *some* funds towards Inverleigh’s educational facilities. However, under Section 5.11 Developer Responsibilities, there is a “list of infrastructure upgrades required for the continued growth of the township”; all these infrastructure upgrades are then specifically listed as a developer responsibility applicable to a specific Potential Growth Area, except one, “relocation of tennis courts to recreation reserve” (Table 1).

Table 1

"List of infrastructure upgrades required for the continued growth of the township:"	Specifically listed as a Developer Responsibility under Potential Growth Area
Intersection upgrades and street lighting upgrades at: Hopes Plains Road/Hamilton Highway, Common Road/Hamilton Highway	1 (Hopes Plain), 3 (Common Road)
Upgrade or replacement of twin bridges to a 15 tonne capacity bridge	3
Access Management Plan for the Future Investigation Area to the satisfaction of VicRoads	5
Pedestrian link along the Hamilton Highway linking Hopes Plains Road to the town centre	1
Bridle paths	4, 5, 6
Green links and pedestrian links	1&2, 3, 6 (Green links), 1&2, 3, 4, 5, 6 (pedestrian)
Bio link from Flora Reserve to Leigh River	3
Relocation of tennis courts to recreation reserve	None Listed
Gateway treatments	5
Bush approaches to entrances	1&2, 4, 6
Bushfire management as per the Strategic Bushfire Risk Assessment for Inverleigh	1&2, 3, 4, 5, 6

If no developer is being held accountable to provide funding, the cost will fall back to Council, yet Council have already stated cost has been an issue in relocating and providing new tennis courts (let alone the building of a new Primary School or Kinder). Failure to address this issue ultimately means the children of Inverleigh suffer.

Strategy 5.1 of Amendment C8/GPLA is "Support development that includes the provision of infrastructure and services", as outlined, I feel strongly that the Structure Plan does not adequately include the provision of infrastructure and services in relation to the educational facilities in Inverleigh.

APPENDIX

Attachment 1

"Class sizes July 2019" is included as an attachment and can also be found via this link:

<https://www.education.vic.gov.au/about/department/Pages/factsandfigures.aspx#link31>

Attachment 2

The State Government announcement re three-year old Kindergarten is included as an attachment and can also be found via this link:

<https://www.education.vic.gov.au/about/programs/Pages/three-year-old-kinder.aspx#link35>

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

I am opposed to elements of Amendment C87 to the Golden Plains Planning Scheme because 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.

I favour sustainable and safe development in Inverleigh and the establishment of town boundaries and see the benefits of sustainable population growth. The Shire's rationale for amending the planning scheme to align with the definitions of the Victorian Planning Provisions is appropriate, and the areas for rezoning included in Amendment C87 is in response to demand for development. Nonetheless I believe there are deficits in what underpins the content of Amendment C87 to the Golden Plains Planning Scheme.

The Golden Plains Shire does not have a track record in the Inverleigh community of consulting in any meaningful way, of listening, and of putting the interests of the Inverleigh community above that of other projects in the shire.

According to the March 2013 Golden Plains Local Government Inspectorate Report, "Good governance is important for several reasons. It not only gives the local community confidence in its council, but improves the faith that the elected members and officers have in their own local government and its decision making processes. It also leads to better decisions, helps local government meet its legislative responsibilities and importantly provides an ethical basis for governance."¹

I have lost confidence in the internal governance of the Golden Plains Shire and its capacity to implement the objectives and strategies of the Inverleigh Structure Plan and those listed in Amendment C87 to the Golden Plains Planning Scheme, specifically 21-07-5, in the best interests of Inverleigh and its future.

My position is based on the following information in regards to 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 about 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.

1. Process for seeking community feedback on Amendment C87 and the labelling of the process as the Inverleigh Structure Plan

- The submission form is titled – *Amendment C87gpla – Inverleigh Structure Plan*, which has added an unnecessary level of confusion to community members who were of the belief the structure plan was being amended or was still in draft, which was and is not the case.
- The Inverleigh Structure Plan 2018/2019 (date varies throughout the Golden Plains Shire documents) is approved. Amendment C87 is noted to support the Structure Plan and the Planning Policy Framework.
- The Explanatory notes state compliance with the Clause(s) but there is a lack of definition and detail of how Amendment C87 actually complies, rather an overuse of expansive and passive action statements such as, "There is no public transport to Inverleigh², however Amendment C87 seeks to promote a housing market that meets the needs of the community" and "Amendment C87 is consistent with the broad principles of biodiversity protection and retention of existing native vegetation".
- Amendment C87 Inverleigh specific changes in Clause 21, reduces the objectives from 6 to 5, and the strategies from 38 to 14. The rationalizing of the planning document may be in line with Victorian Government advice; however it does not appear to align with the Structure Plan. The Structure Plan has 19 principles (pages 49 – 57), 33 objectives and 49 strategies. The reduction of the objectives and the strategies by over 50% effectively removes protections for the community in the operationalizing of the Structure Plan. The clear intent of Amendment C87 is rezoning for development and reducing the minimum lot size.

¹ Local Government Inspectorate Report March 2013, page 7.

² Of note, there is a Friday return bus from Inverleigh to Geelong of very short duration.

- The Amendment C75 Panel accepted the argument against the deferral of Amendment C75 because the amendment conformed with the then existing structure plan (2005)³.
- The conformity of Amendment C87 with the Inverleigh Structure Plan 2018/2019 is untested.
- Amendment C87 also removes any reference to policy guidelines, application of zones and overlays or implementation and further strategic work. It is not clear where this information will appear in planning documents available to residents of Inverleigh once development overlays are removed.
- I have concerns arising from the complete removal of strategies related to The Inverleigh Fauna and Flora Reserve. The area is managed by Parks Victoria, however the decisions and impacts of Amendment C87 approval will affect this area and vice versa.
- It is also unclear why the Golden Plains Shire in its stated goal of reassuring the Inverleigh Community of its future, that it has chosen to not address the rezoning of the northern area of the Inverleigh Fauna and Flora Reserve from farming zone to align it with the rest of the Reserve which is zoned as public conservation and resource zone.
- The Structure Plan lists the Inverleigh Community Plan as a key reference point in strategic plans and representation of the community's priorities, however it is a 2013 document, is therefore 6 years old and was, according to the document itself, to be updated every two years (page 6). There is no evidence there has been an evaluation of priorities met or of their ongoing relevance.
- The map included in the Structure Plan is incorrect and Inverleigh local residents have already met with Golden Plains Shire strategic planning staff, in an attempt to point out the factual errors and request corrections. It is a reasonable expectation that the approval of Amendment C87, in the context of the explanatory notes stating a new Inverleigh Structure Plan will not occur for another 15 years and will likely only be triggered by a lack of available land for further development, be based on a factual accurate Structure Plan.⁴
- The inadequacy of the community notification of the alignment of the proposed new clause for the Inverleigh Local Planning Policy Framework. It is noted on the Golden Plains Shire website at the bottom of Amendment C87 Explanatory notes that, "The Local Planning Policy Framework (LPPF) is currently under review and there is potential that the changes from the LPPF review will coincide with changes resulting from Amendment C87 gpla. A draft of the proposed new clause for Inverleigh under the LPPF review is provided below."⁵ Reference to policy guidelines, application of zones and overlays and further strategic work is not included as is clarity about community feedback.

2. A track record of poor planning and stewardship

- Inverleigh Streetscape was an urban/suburban design completed by MESH, the same company who completed the development feasibility study⁶ referred to in the Inverleigh Structure Plan. The streetscape plan was set aside following a coordinated community pushback and forced consultation and is yet to be removed from the Structure Plan⁷.
- The streetscape plan was not developed in consultation with the Inverleigh community and included design changes that lacked any common sense or reflected the activities that make up Inverleigh. Examples include farming equipment being unable to move along the Hamilton Highway; the wind turbine transport from Corio Quay not being able to park or move safely along the Hamilton Highway, and reduction of the truck, transport and tourist van parking.
- Most importantly, this streetscape plan was not funded, was best described as aspirational and the plan development cost upwards of \$70,000. Money that could have been directed to fixing drains and roads and general maintenance which has not been maintained to standards for years⁸, refer transcript of community meeting.

³ Golden Plains Planning Scheme Amendment C75 Panel Report 28 March 2018, page 13.

⁴ www.goldenplains.vic.gov.au/sites/default/files/C87gpla%20Explanatory%20Report.pdf

⁵ www.goldenplains.vic.gov.au/sites/default/files/C87gpla%20Explanatory%20Report.pdf

Strategic planning page - www.goldenplains.vic.gov.au/residents/my-home/planning/strategic-planning, downloaded 30 September 2019

⁶ Inverleigh Structure Plan - Development Feasibility Study Package - Attachment K.

⁷ Strategic planning page - www.goldenplains.vic.gov.au/residents/my-home/planning/strategic-planning, downloaded 30 September 2019

⁸ Golden Plains Shire confirmed minutes 23 July 2019.

- Very recently the Golden Plains Shire has requested community input into the Inverleigh Works Plan via a survey on social media and its website giving the community opportunity to identify 1) potholes of concern, 2) select between recycled plastic bollards, seats or treated wood and 3) if we want a bike rack. It goes on to say:

To deliver significant improvement to drainage in the Inverleigh Streetscape would require structural infrastructure such as kerb and challenging [sic]. During the community consultation in March, survey respondents clearly stated [sic] they did not want major infrastructure changes in downtown Inverleigh. Within the current annual road and drainage maintenance program budget, Council will complete a routine clean out of the drains in downtown Inverleigh in 2019.

- I believe that this is not an accurate reflection of the community consultation regarding drainage, which included fixing the worst areas of the drains. A clean out of the drains as part of the maintenance program should have long been a routine maintenance scheduled task which was completed, and it has not been. I admit however it is an actual promise of action when compared to the streetscape plan, which was unfunded, aspirational and inappropriate.
- The open drains and repeated flooding on parts of Common Road since earlier greenfield development⁹ could have been reduced if compliance with the *Infrastructure Design Manual*, which the Golden Plains Shire signed up to in 2013, was required as part of the development plan, associated schedules and enforced prior to compliance certification.
- The corrective action undertaken by Golden Plains Shire to fix the open drains and flooding on parts of Common Road does not comply with the *Infrastructure Design Manual*, results in pooling for longer than recommended, was inadequately completed¹⁰, and not risk assessed¹¹ because there was not enough money. The current community response and concerns over safety would have been avoided.
- The Golden Plains Shire includes the *Infrastructure Design Manual* as a reference document. According to the Golden Plains Shire, "Reference documents provide background information to assist in understanding the context within which a particular policy or provision has been framed. Reference documents have only a limited role in decision making as they are not part of the planning scheme. They do not have the same status of incorporated documents or carry the same weight."¹² This allows the Golden Plains Shire to not meet the requirements of the *Infrastructure Design Manual*.
- The Schedule 16 to Clause 43.04 Development Plan Overlay for Hopes Plains Road is the only Schedule to date that has included the requirement for compliance with the *Infrastructure Design Manual*, which may suggest some improvement in expectation from the strategic planning staff and commitment by the Golden Plains Shire.
- Inadequate planning and costing of infrastructure requirements associated with new subdivisions, and specification of developer contributions resulted in \$300,000 being diverted (following Ministerial approval with Council deeming there was no higher priority applicable under the Country Roads and Bridges program) from the allocated funding share under the Country Roads and Bridges program to pay for the shortfall for the roundabout in Bannockburn, which was noted by VicRoads to be directly attributable to the Golden Plains Shires lack of planning, "56. (i) VicRoads have also stated that the current traffic volumes at the intersections are primarily due to the extensive residential developments in Bannockburn, for which Council should have planned better in terms of developer contributions to fund expected infrastructure."¹³
- The lack of maintenance and improvements to roads in Inverleigh and district is reflected in its 2018 Customer Satisfaction Survey results of unsealed roads, sealed local roads, community decisions, consultation and engagement and lobbying identified as the areas for focus and improvement¹⁴.
- The Structure Plan is in the main unfunded and Golden Plains Shire has not provided detail or strategic planning in how it will secure or work with the community to secure the funding.
- The Inverleigh Community Plan 2013, listed short term priorities for the community which included a focus on roads, parking, drainage, walking tracks etc. Some have been achieved, however some of the

⁹ Golden Plains Planning Scheme Amendment C74 Panel Report sections 4.3 and 4.4.

¹⁰ Infrastructure Design Manual sections 12.9.2, 20.3.3, 20.3.4, 20.3.5.

¹¹ Golden Plains Shire minutes 23 July 2019.

¹² Golden Plains Shire website downloaded 4 October 2018.

¹³ Golden Plains Shire minutes 28 January 2014.

¹⁴ J006-43 Customer Satisfaction Survey 2018 – Golden Plains Shire, page 14.

basic priorities such as the school crossing improvements; drainage works to fix clogging and outflow from the primary school have not. School children still on wet days have to walk around flooded paths at the school crossing.

- My confidence in adherence to the spirit of reasoning in approving Amendment C74 by the Panel is low. According to the Panel report, the objections were rejected in relation to bushfire and gave the following rationale:
 - However, under Clause 32.03-3 (Subdivision), the minimum lot size defaults to the Schedule to the zone, which for Inverleigh refers to the ISP, which designates lots sizes of 1 to 2 hectares¹⁵.
 - The policy requires buffer zones around future subdivisions close to the Inverleigh Nature Conservation Reserve and Inverleigh Golf Course and vegetation management with a minimum lot size of 2 hectares for lots adjacent to these areas¹⁶.
 - The Amendment is supported by strategic directions in the Golden Plains Planning Scheme for the site to be rezoned and developed for low density residential development. 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. The application of the Development Plan Overlay Schedule 16 (DPO16) will guide how the site can be developed in a manner responsive to bushfire risk and stormwater management¹⁷.
- The Panel noted:
 - The Amendment (C74) does not propose to alter the Schedule to the LDRZ hence low density residential subdivision, under the Amendment, is limited to 1 to 2 hectares. These limits reduce the extent of population growth that might be exposed to bushfire risk. They also allow space on lots and between dwellings in subdivision design to manage vegetation and put in place appropriate bushfire protection measures.¹⁸
- According to the Golden Plains Shire¹⁹ the Amendment C74/Schedule 16 development plan is yet to be received.
- It is unclear if the minimum lot size reduction to 0.4 hectares will enable the building of lots in this subdivision that are outside of the Panel's recorded 1 - 2 hectare lot sizes that afforded a protection that would reduce the extent of population growth that might be exposed to bushfire risk etc.
- It is also a fact that the lot size of 1 – 2 hectares is not clearly articulated in Schedule 16 to Clause 43.04 of the Golden Plains Shire Planning Scheme.
- It is not unreasonable for me to believe that a delay in submitting the development plan may include some intent to take advantage of the Amendment C87, 0.4-hectare minimum lot size, which would undermine the Panel's rationale for deciding bushfire safety would be ensured by lot sizes of 1-2 hectares. I do not know that this is the case, but if it is it suggests an abject disregard for the safety of the Inverleigh community.

3. Staging of development

- A staging plan is required as part of a development plan prior to obtaining a permit however there is no clear staging plan for Inverleigh over the life of the structure plan which would support the Golden Plains Shire's position that decisions will not be made in isolation without regard to the big picture²⁰. The Inverleigh Structure Plan identifies the goal for growth over a 15-year period (which aligns with Victorian Planning Provisions 11.02-15) and a forecast of dwellings over 20 years at about 27 new houses per year.²¹

¹⁵ Golden Plains Planning Scheme Amendment C74 Panel Report, page 11.

¹⁶ Golden Plains Planning Scheme Amendment C74 Panel Report, page 18.

¹⁷ Golden Plains Planning Scheme Amendment C74 Panel Report, page 1 and 10.

¹⁸ Golden Plains Planning Scheme Amendment C74 Panel Report, page 22.

¹⁹ Email from Senior Strategic Planner Golden Plains Shire in confirming the EPA Contamination Report was part of the Schedule 16 which was yet to be received, dated 26 September 2019.

²⁰ Inverleigh Structure Plan 2018/?2019 – page 5.

²¹ Inverleigh Structure Plan, page 38, "Planning is required to ensure there is sufficient land available to meet forecast demand and to plan to accommodate projected population growth over at least a 15-year period providing clear direction on locations where growth should occur."

- The requirement for residential land is across the whole of the Golden Plains Shire and Inverleigh is assigned 525 lots proposed through Potential Growth Areas 1, 2 and 3 with unknown additional numbers through Potential Growth Areas 4, 5 and 6. The subdivision at 385 Common Road was rezoned in Amendment C75 from farming to low density residential and expression of interest is already underway. Hopes Plains Road was rezoned from farming to low density residential in Amendment C74 and the development plan and Schedule 16 requirements are yet to be submitted.²²
- This situation will provide the opportunity for agency/developer(s) to be building across both new subdivisions and releasing land at rates greater than the stated moderate goal of (about) 27 new homes per year.
- I do not have confidence that the Golden Plains Shire has the ability, will (it needs to raise revenue) or capacity to resist developer(s)/agency's pressure and through approval permits, limit the predicted growth to the stated moderate population growth of about 27 new homes annually for the life of Amendment C87 and Structure Plan. Based on the low level of general accessibility of development plans (public display is not required in Victoria, however they are normally available onsite and in business hours at the Shire Offices upon request), 173 agreements and reporting of compliance at certification by the Golden Plains Shire, the ability of the Golden Plains Shire to achieve the C87 Amendment Infrastructure and Service Strategies 5.1 and 5.2 is low.²³
- The Structure Plan lists non-monetary infrastructure upgrades required for the continued growth of Inverleigh in Developer Contributions (5.11). There is no transparency of, or a plan based on a formula or evidence-based definitive costing model that gives any indication that the Golden Plains Shire has a timeline for achieving these or that the need for them is linked to the number of dwellings built each year. For example, the upgrade to the Common Road/Hamilton Highway intersection is a priority in the Inverleigh Community Plan 2013, the 2005 Inverleigh Structure Plan and is noted in the current Structure Plan as a developer responsibility for Potential Growth Areas 1 & 2 (page 60) and 3 (page 61).
- The Structure Plan includes, "Transport for Victoria advised that in regard to roads, the intersection of the Hamilton Highway and Common Road requires an upgrade. Further development of land along Common Road must include an upgrade to this intersection to cater for its increasing catchment" (page 30).
- I am not entitled to know as a member of the community when this is to occur, or if it is on a "project" or operational plan for this to occur. The Structure Plan states, " Before Council will consider any rezoning of land between Hopes Plains Road and Common Road, an agreement must be made determining the funding arrangements by landowner(s)/developer(s) for the construction and sealing of Hopes Plains Road (page 60)" yet amendment C75 rezoned 385 Common Road and Schedule 15 to Clause 43.04 Development Plan Overlay only includes "A traffic assessment that addresses the traffic that will be generated from the development of the land, how this will impact the local street network and what, if any, mitigation measures are required." The traffic assessment suggested a 7.5.2 Urban Channelised T-junction – Short Lane Type CHR(S)²⁴ and does not go so far as to comment on impacts on local street networks.
- I am expected to trust the Golden Plains Shire will abide to needs and ensure the upgrade is achieved however whether this is to occur after one year, coincide with initial development or by certification (which given the one subdivision is noted to be in 3 stages with 5 future stages and about 137 dwellings, approximately 51 dwellings in initial stages) could be years in achieving the upgrade.²⁵
- Schedule 16 Clause 43.04 Development Plan Overlay, for Amendment C74 Potential Growth Area 2, does include the requirement for, "The construction of upgrade treatments at the intersection of Hopes Plains Road and the Hamilton Highway prior to the issue of Statement of Compliance for the first stage of subdivision. The payment of a \$95,000 contribution for the maintenance of Hopes Plains Road prior to the issue of Statement of Compliance for the first stage of subdivision. This is clearly a much-improved operationalizing of the objectives and strategies of the Structure Plan however it is unclear how the sum of \$95,000 was reached. Was this a sum arrived at based on thorough costings,

²² Golden Plains Planning Scheme Amendment C75 Panel Report 28 March 2018.

²³ Golden Plains Planning Scheme 21.07-5, page 18 Amendment C87 proposed changes.

²⁴ VicRoads Supplement to Austroads Guide to Road Design – Part 4 Rev. 2.2

Golden Plains Shire Confirmed Minutes attachment: Item 7.7 – AH.2 25 June 2019.

²⁵ Golden Plains Shire Confirmed Minutes attachment: Item 7.7 – AH.2 25 June 2019.

will it provide maintenance of the road for one year, two years, the life of the subdivision or the life of the Structure plan? If not, will cost move to the residents or simply, as is the experience to date, be left in a poor state or diverted elsewhere²⁶.

- A similar lack of transparency of thinking and of consultation with the community and other agencies is the predictable impact of Amendment C87 on the kindergarten and primary school. The Structure Plan solution to the lack of onsite expansion land is to spilt the school campus because it appears to be the most convenient solution. It is an unsound, unsafe and unimaginative option. For example, requiring a developer to build tennis courts at the Inverleigh Reserve and free up the land next to the school which the community and school could support and work toward establishing expansion with the responsible agencies, would achieve two of the strategies of the structure plan and the Amendment C87, being consolidation of development within the town centre, including community and social facilities and resolve the school's constraints in terms of enabling growth (page 43 of Structure Plan).

4. Inspectorate Report

- The Local Government Golden Plains Shire Inspectorate Report March 2019 Identified 1) the CEO had not had a performance review since 2017, 2) that there was no objective auditing of individual staff use of procurement cards, 3) identified Councillors had not met their legislative requirements for interest returns, 4) the stated governance oversight of councillor expenses and reimbursements by the CEO was not supported by objective auditing, 5) that community grant assessments were being completed but by whom was not known, 6) there was non-compliance with the Public Records Act/document keeping including digital and non-digital, and 7) compliance with the council procurement policy and Section 186 of the Act including no list of contracts, and tender panel members not being those who completed the assessments, lack of signed confidentiality and conflict of interest declarations, or appropriate delegate sign off.
- Regards procurement practices, the report is particularly clear about the Golden Plains Shire's suboptimal practices including a request made to council some four months prior to the report date for the provision of a list of lump sum contracts awarded by council in excess of \$25,000 for the previous two-year period that could not be provided by the Golden Plains Shire. The August 2018 Response has completed most of the recommendations to date²⁷, which should translate into improved governance of its internal processes and accountabilities.
- Nonetheless, as recently as 24 September 2019, the unconfirmed minutes record the instrument of delegation (embedded in the procurement policy dated 24 September 2019) was changed to allow the CEO's financial limitation under the delegation be doubled from \$200,000 to \$400,000 for awarding a single item/contract. The motion was a 3:3 councillor vote, with the Mayor casting his vote in favour of the motion and then exercised his casting vote to carry the motion.²⁸
- The support for this decision was in part attributed to the improved and recent internal procurement processes and policy development (also dated 24 September 2019) following the inspectorate report recommendations which have not been in operation for any length of time and have not been evaluated as effective.

5. Developer contribution oversight and transparency

- The Golden Plains Shire's policy for guiding the collection of development contributions does not have any formal Infrastructure Contributions Plans (ICP's) or Development Contributions Plans (DCP's)²⁹, rather working within a 173 Agreement. My concern is not the use of the 173 Agreement to secure infrastructure and development contributions outside of a schedule but as this agreement is

²⁶ Golden Plains Shire Confirmed Minutes 23 July 2019.

²⁷ Golden Plains Shire Response to the Inspectorate Report:

www.goldenplains.vic.gov.au/sites/default/files/Council%20Response%20-%20Progress%20Report%20-%20August%202019.pdf

²⁸ Golden Plains Shire unconfirmed minutes for 24 September 2019 downloaded on 30 September 2019.

²⁹ Golden Plains Shire Annual Report page 104.

www.goldenplains.vic.gov.au/sites/default/files/GPSC%20Annual%20Report%202018_19.pdf

subject to seal, it is not a transparent process. Councils that use a Development Contribution Plan report to the Minister and this is tabled in Parliament³⁰.

- Reporting on the content and compliance with 173 Agreements at certification is not available unless under a Freedom of Information application.
- The reasonableness of the level of influence of landowner(s)/agencies on the decision-making of the Golden Plains Shire is unclear.
- The Golden Plains Shire Policy Manual Development Contributions (10.4) states all funds are deposited into an account and maintained as part of discretionary component of Retained Earnings.
- According to the policy, the last review was in May 2016 (as opposed to an amendment) in response to the State Government's desire to reduce complexity, increase transparency and standardize levies across a range of development settings³¹. The minutes include, "This policy will provide an interim measure until the development of an Infrastructure Contributions Plan for Council is formalised." There is nothing to suggest this has been completed or a formal decision made not to complete it.
- The lot costings are unchanged since 2016. Given the cost of land in Inverleigh has increased markedly since that time, and it is reasonable to estimate that 0.4 hectare lots could result from the Amendment C87 rezoning, and that there would be more lots resulting in increased profit for the owner(s)/agency³². It is also reasonable that the Golden Plains Shire Policy Manual Development Contributions cost per lot be reviewed regularly to reflect this increase in predicted profits.
- Reporting of development contributions is via the Auditor General audit for the annual report and reports culminative figures only. It therefore remains that the Inverleigh community is unlikely to know what has been asked for, when and whether at the certification point the agreement was complied with or if any monetary contributions were actually spent to directly benefit the Inverleigh community or directed elsewhere.
- The Golden Plains Shire has the power and option to improve the communication of information about agency/developer(s) contributions types and outcomes.

6. Failure to rezone as part of Amendment C87, the Inverleigh Flora and Fauna Reserve

- In meeting the needs for residential land and development, the Golden Plains Shire has amended land from farming to low density residential, has removed objectives and strategies (other than fire related) for any consideration of the Inverleigh Flora and Fauna Reserve which is a significant part of the lives of the residents of Inverleigh and many visitors.
- The Golden Plains Shire claims it is in the interest of the Inverleigh Community to be assured of its future, that the areas of growth and the logical sequence will all be clear through rezoning and establishment of a town boundary.
- There is an apparent lack of will by the Golden Plains Shire to rezone the northern part of the Inverleigh Flora and Fauna Reserve from farming to public conservation and resource zone in line with the southern part of the Inverleigh Flora and Fauna Reserve.
- Rezoning this land as part of Amendment C87 would be appropriate and go some way to instilling some confidence that the Golden Plains Shire has listened and realised priorities for the community of Inverleigh.
- The public conservation and resource zone (Clause 36.03 Planning Practice note 42 – Applying the Rural Zones - Planning Schemes) includes, "This zone provides for places where the primary intention is to conserve and protect the natural environment or resources. It also allows associated educational activities and resource-based uses." The Inverleigh Flora and Fauna Reserve has registered critically endangered flora.

7. Poor performance in the 2018 local government Customer Satisfaction survey

- My concerns about the capacity of the Golden Plains Shire to support and represent the community of Inverleigh equitably and appropriately, is supported by the Customer Satisfaction Survey 2018

³⁰ www.planning.vic.gov.au/policy-and-strategy/development-contributions

³¹ Golden Plains Shire Minutes 24 May 2016 downloaded 4 October 2019.

³² www.ahuri.edu.au/__data/assets/pdf_file/0018/2097/AHURI_Final_Report_No140_Counting-the-costs-planning-requirements,-infrastructure-contributions,-and-residential-development-in-Australia.pdf

Golden Plains Shire which concluded, "Golden Plains Shire Council's performance on most measures is in line with average ratings for Large Rural Group. However, in the areas of overall performance, Council performs significantly lower than the group average" and "Golden Plains Shire Council's performance is significantly lower than State-wide averages for councils across all core measures."³³

8. Protection of Aboriginal cultural sites

- The Golden Plains Shire states it works with Aboriginal Affairs Victoria and local co-operatives to identify Aboriginal cultural heritage sites and determine areas of high or low archaeological sensitivity.³⁴ The Golden Plains Shire supported a Heritage review which was "settlement" specific and has a comprehensive list of registered sites and the Structure Plan and Amendments reflect the intent to protect and maintain it with a Heritage Plan and register³⁵.
- Regards Aboriginal Cultural Heritage, the Golden Plains Shire does not have a comparative shire or even district wide approach. The Golden Plains Shire Amendment C87 places the requirement for the safe keeping and identification of these sites with each landowner/developing agency (which risks inconsistency in approach and a narrow focus), by way of an overlay on each piece of land. Landowners (often along with lifestyle changes) and developer(s) are unequivocally focused on making a profit and there is no evidence the best interest of the traditional custodians and the safekeeping of these sites has been met through overlay requirements.
- There are approximately 20 Aboriginal sites recorded previously in the Inverleigh area and are registered with Aboriginal Affairs Victoria (AAV) however the details and information are not readily available nor has there been a mapping of potential additional sites.
- Inverleigh is subject to an extensive Aboriginal cultural significance overlay.
- As part of the 2005 review of the Inverleigh Structure Plan it was recommended that 1) a survey and report regarding important Aboriginal cultural heritage sites should be undertaken, 2) for planning purposes, an archaeologist should be engaged to undertake a desktop assessment, 3) that known sites would be presented on a map and the information used to highlight zones of high or low archaeological sensitivity, 4) that subsequent archaeological investigation would be field survey of areas proposed for development and include consultation of the Wathaurong Aboriginal Cooperative, 5) that appropriate measures should be undertaken to ensure new development does not adversely impact on such sites and 6) a cultural heritage assessment could be a requirement of a Development Plan Overlay on any sites proposed to be rezoned and developed (this appears to have been actioned by the Golden Plains Shire).
- The C75 amendment rezoned 385 Common Road, which is part of Potential Growth Area 3 and includes four of the registered Aboriginal sites and is believed to be the site of a conflict in which Aboriginal Peoples died³⁶.
- The Flora and Fauna Reserve and Potential Growth Area 6 also have registered sites.
- Planning Practice Note 37, Rural Residential Development specifies any proposal must include an adequate assessment of the locality's landscape and heritage values and the potential for impacts, or that landscapes or places classified by the National Trust of Australia or included in the Victorian Heritage Register or registers maintained by the Office of Aboriginal Affairs Victoria or the Australian Heritage Council must not be proposed for rural residential development without consultation with those organisations³⁷. There is no evidence this takes place **prior** to a proposal or amendment, including those approved through Panel review - C74, C75 and the current Amendment C87.
- The development overlay only requires an owner/agent to complete a review of greenfield to a specific subdivision and not that bordering on or impacted by the development/subdivision. For example, there is no evidence the proposed positioning of the biolink for 385 Common Road or the planned river front walkways etc was informed by an understanding of the cultural significance of the Inverleigh area, or the areas bordering on the developments and any registered sites.

³³ www.goldenplains.vic.gov.au/sites/default/files/J00643%20CSS%202018%20Golden%20Plains%20Shire%20Council%20Report.pdf

³⁴ Golden Plains Planning Scheme 21.07-5; 21/12/2017 C76.

³⁵ www.goldenplains.vic.gov.au/residents/my-home/planning/heritage-planning

³⁶ Lonsdale, Joan *Gateway to the West*, Inverleigh progress Association, 1978, page 5.

³⁷ www.planning.vic.gov.au/resource-library/planning-practice-notes

- The Planning Practice Note 45 states:
 - A request to rezone land does not trigger a requirement to prepare a CHMP. A preliminary cultural assessment is strongly recommended at this stage to identify any relevant constraints and opportunities that may assist in rezoning of land.³⁸
- There is no evidence any preliminary cultural assessment of all the Amendment C87 rezoning areas or of Inverleigh has been completed by the Golden Plains Shire.
- The C75 amendment rezoned 385 Common Road and the development plan was subject to and informed by a list of plans that did not include cultural significance plans or knowledge.

I believe strategies for increasing the confidence in the Golden Plains Shire to advocate for and meet the needs of the Inverleigh community by the rezoning in Amendment C87, but also in previous Amendments C74 and C75, should be considered as part of the approval and that these strategies include:

- The Golden Plains Shire correct the factual errors of the Structure Plan.
- The Golden Plains Shire rezone as part of Amendment C87, the section of the Inverleigh Flora and Fauna Reserve bounded by Inverleigh/Teesdale Road, Woolbrook Track and Bakers Lane, from farming to public conservation and resource zone.
- The Golden Plains Shire take responsibility for the oversight of and development of a proactive and Inverleigh district-wide approach to the safe keeping of areas of Aboriginal cultural significance that complies with Planning Practice Notes 37 and 45, and reflects the significant extent of cultural overlays in the Amendment C87 rezoned and Potential Growth areas.
- The Golden Plains Shire Policy Manual Development Contributions (10.4) be reviewed to adjust the cost per lot contribution and/or "in kind" negotiations, to reflect the estimated increased profit for owners/agency(s) from the Amendment C87 minimum lot size of 0.4 hectares rezoning.
- The Golden Plains Shire requires as part of greenfield subdivision and issuing of planning permits to communicate to the Inverleigh community:
 - Agreed upon timeframes associated with the subdivision developer contributor infrastructure outcomes and "in kind" agreements.
 - Report on an annual basis, developer(s) contributions obtained as part of a greenfield subdivision development in Inverleigh as a result of the rezoning associated with the Structure Plan for the life of the Structure Plan, and was it spent for the purpose for which it was obtained and to the benefit of the Inverleigh community.
 - Provide a public report at Certification and Statement of Compliance stages for each greenfield subdivision that identifies any changes to the planning permit, any failures to comply with the approved development/subdivision plan, post-market issues and any lessons to be learned to inform the next and following stages of the staged development of the rezoned land in Amendment C87 for the life of the Structure Plan or about 15 years.
 - Report annually the alignment of subdivisions to the logical, orderly sequence of growth and adherence to the goal of a moderate growth rate.

³⁸ A subdivision includes high impact activities as defined by the Aboriginal Heritage Regulations. Planning Practice Note 45 page 2.

Sustainable Growth in Inverleigh 01-10-2019

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

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

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

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

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

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

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

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

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

The following factors will impact:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

