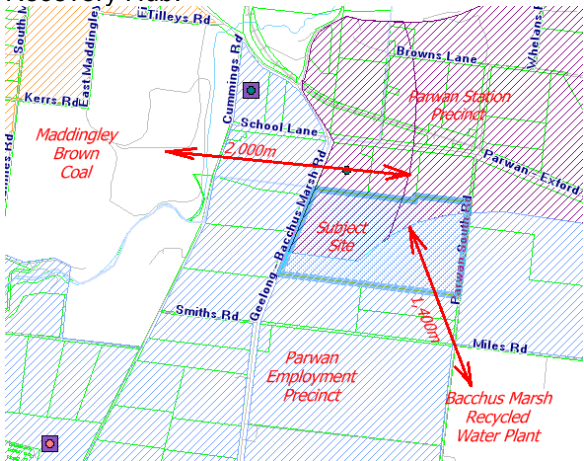


# Attachment - Item 8.1c

**Attachment 3: Summary of Submissions**

Submission Number	Affected Property/ Agency	Submitter's Position	Submission Summary	Council Officer Recommendations/Comments (N.B. Underlining indicates added text. Strikethrough indicates deleted text.)
1	4256 Geelong-Bacchus Marsh Road  and  Property No. 382850, Bences Road, Merrimu	Comments only	<p><u>4256 Geelong Bacchus Marsh Rd Parwan:</u></p> <p>This property has been identified as part of the future Parwan employment growth precinct. The submitter does not support having this land included in the future employment growth precinct.</p> <p>If Council pushes for the subject land and surrounds to remain earmarked for employment, that land area will be vacant for what could be the next 30-40 years.</p> <p>The land should be earmarked as Mixed Use Zone (MUZ), as this would provide flexibility to the land owner to provide an array of uses such as employment, residential, commercial, light industrial and a mixture of the above; i.e. SOHO living.</p> <p>From previous experience, a MUZ provides a higher number of jobs per square metre rather than standard employment/industrial uses.</p> <p>If Council is not willing to entertain the option of earmarking the land for future mixed use, the submitter would prefer to keep the existing Farming Zone, rather than 'future employment'.</p> <p><u>Property No. 382850, Bences Road, Merrimu:</u></p> <p>This property is within the Merrimu residential growth precinct. The submitter has no objection to this.</p>	<p><u>Parwan:</u></p> <p>The subject site is located partially within the Parwan Employment Precinct (PEP) and partially within the Parwan Station Residential and Commercial Precinct, as shown on the map below.</p> <p>The UGF does not rezone land and therefore the suggested zone cannot be considered. The most appropriate zones will be identified as part of the future PSP/planning process.</p> <p>There is no strategic justification for a Mixed Use Zone (MUZ). The MUZ contemplates residential use amongst other uses, which are inappropriate within amenity buffers required to protect the ongoing operation of the Bacchus Marsh Recycled Water Plant and the Maddingley Waste and Resource Recovery Hub.</p>  <p><b>Figure 1:</b> 4256 Geelong-Bacchus Marsh Rd delineated in blue.</p>

Submission Number	Affected Property/ Agency	Submitter's Position	Submission Summary	Council Officer Recommendations/Comments (N.B. Underlining indicates added text. Strikethrough indicates deleted text.)
				<p><u>Merrimu:</u></p> <p>The submitter's support for the Merrimu residential growth precinct is noted.</p>
2	8 Robertsons Road, Darley	Comments only	<p>Concerned about the lack of consideration for the need to upgrade the road network to cater for urban growth. States that "this town already gridlocks because of an inadequate road system". Concerned about increasing rates and a reduction in service provision.</p>	<p>Transport is one of the key elements of the UGF; it includes the following transport objectives (page 61):</p> <ul style="list-style-type: none"> <li>• <i>“Provide a connected and efficient arterial road network.</i></li> <li>• <i>Maintain the Western Freeway as the key east-west link across Bacchus Marsh and as a scenic route to the Central Highland Region gateway.</i></li> <li>• <i>Provide a second north-south arterial road (i.e. the Eastern Link road or ELR).</i></li> <li>• <i>Improve the accessibility and capacity of the train service.</i></li> <li>• <i>Improve and expand bus coverage to key existing and future destinations.</i></li> <li>• <i>Facilitate walking and cycling as viable transport modes.</i></li> <li>• <i>Review optimal management and investment opportunities at the Bacchus Marsh Aerodrome.</i></li> <li>• <i>Strengthen the potential for road networks to manage local traffic movement.”</i></li> </ul> <p>Table 4 in the UGF (Key growth actions) lists the following project (Ref. 22), amongst others:</p> <ul style="list-style-type: none"> <li>• <i>“Localised road upgrades (including State roads) as per the Bacchus Marsh Integrated Transport Strategy.”</i></li> </ul> <p>The exhibited MSS Clause 21.05-3 lists a number of objectives and strategies which will ensure the delivery of ‘integrated transport’ within and beyond the new growth precincts. Clause 21.05-4 includes an objective “<i>to provide appropriate levels of community facilities and infrastructure ....</i>”. It includes a strategy to “<i>require new development to make financial contributions to the provision of community facilities and</i></p>

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				<p><i>infrastructure, such as roads, bicycle paths, footpaths, public transport, ....., via development contribution plans or infrastructure contribution plans”.</i></p> <p>It is recommended that the exhibited MSS be amended as follows:</p> <p>Clause 21.05-3 Objective – Integrated transport: Add the following objective:</p> <ul style="list-style-type: none"> <li>• <u>Strengthen the potential for Bacchus Marsh district road networks to manage local traffic movements.</u></li> </ul> <p>Clause 21.05-3 Strategies: Add the following strategy:</p> <ul style="list-style-type: none"> <li>• <u>Require that precinct structure plans for Parwan Station and Merrimu urban growth precincts identify the maximum number of lots which can be developed in each growth precinct prior to the Eastern Link Road being constructed, and the local road network improvements necessary to facilitate such development.</u></li> </ul> <p>Future planning scheme amendments will be required to rezone land and to implement precinct structure plans (PSPs) or development plan requirements. Infrastructure provision will be a key requirement of any PSP or development plan. Any PSP or development plan will need to be supported by an ‘integrated transport plan’, acceptable to both Council and VicRoads.</p> <p>Neither the Moorabool Planning Scheme or the <i>Planning and Environment Act 1987</i> require or enable consideration of any potential impact that the amendment may have on rates.</p>

Submission Number	Affected Property/ Agency	Submitter's Position	Submission Summary	Council Officer Recommendations/Comments (N.B. Underlining indicates added text. Strikethrough indicates deleted text.)
3	17 Riverview Drive, Hopetoun Park	Does not support amendment	<p>Due to C81 being very high on content and low on detail, very few people will be in a position to draw a conclusion. I suggest a detailed breakdown of the areas affected in order for the residents to make an informed decision and then take an overall view as to how C81 affects Bacchus Marsh.</p> <p>Amendment C81 and the UGF do not appear to provide for an additional entry/exit road for Hopetoun Park. C81 states that there will be no sub division, however and then states that sub division is possible. I do not support expansion of Bacchus Marsh until current ratepayers receive the services that reflect the massive Council rates in this area. The high cost of rates and poor service will detract from people moving to or investing in Bacchus Marsh. Once Council provide a standard of service and contain their budget, then perhaps C81 can be viewed in a more constructive light.</p>	<p>The exhibited UGF and Amendment C81 are deliberately high level, as they seek to set the policy scene for future urban growth.</p> <p>As per the response to submission 2, transport is one of the key elements of the UGF.</p> <p>The exhibited MSS Clause 21.05-3 lists a number of objectives and strategies which will ensure the delivery of 'integrated transport' within and beyond the new growth precincts. Clause 21.05-4 includes an objective <i>"to provide appropriate levels of community facilities and infrastructure ...."</i>. It includes a strategy to <i>"require new development to make financial contributions to the provision of community facilities and infrastructure, such as roads, bicycle paths, footpaths, public transport, ....., via development contribution plans or infrastructure contribution plans"</i>.</p> <p>Future planning scheme amendments will be required to rezone land and to implement PSPs or development plan requirements. Any future planning scheme amendments will be publicly exhibited and submissions will be invited. Infrastructure provision will be a key requirement of any PSP or development plan. Any PSP or development plan will need to be supported by an 'integrated transport plan', acceptable to both Council and VicRoads.</p> <p>The UGF indicates that the Hopetoun Park North precinct will be rezoned to LDRZ or Neighbourhood Residential Zone (NRZ). The ultimate zone boundaries and minimum lot sizes will be determined by via a future planning scheme amendment, which will include the application of zone schedules and a new Schedule to the DPO. Development densities will be greater than existing, but less than conventional residential densities.</p>

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4	5 Riverview Drive, Hopetoun Park	Comments only	<p>Future development of Hopetoun Park needs to include:</p> <ol style="list-style-type: none"> <li>1. Public transport to either Melton train station or Bacchus Marsh;</li> <li>2. A small retail strip with a milk bar or convenience store; and</li> <li>3. Access from Hopetoun Park Rd to the west-bound lanes of the Western Fwy.</li> </ol>	<p>Refer to response to submission 2 regarding transport. Furthermore, the UGF includes the following precinct planning principle for Hopetoun Park North:  <i>Consider opportunities to improve road connections in and out of the precinct onto the Western Freeway as well as Hopetoun Park junction with the Old Western Highway.</i></p> <p>It is recommended that this principle be amended as follows:  <i>Consider opportunities to improve road connectivity <del>ons in and out of the precinct, onto</del> <u>with the Western Freeway to and from the west, and as well as Hopetoun Park junction with the Old Western Highway from Hopetoun Park Road.</u></i></p> <p>In response to issue number 2, the UGF states that “residential expansion can be leveraged to deliver local-level community facilities”. The UGF Plan 1 indicates that the Hopetoun Park North residential growth precinct has potential for an activity centre and retail. However, the viability of any activity centre would depend upon the ultimate lot yield and service catchment population</p>
5	141 Lerderberg Park Road, Merrimu	Supports amendment	Having read documentation, the submitter is satisfied with the work undertaken and is supportive.	No action required.

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6	N/A  Melton City Council (MCC)	Comments only	<p><u>Bacchus Marsh Irrigation District:</u></p> <p>The UGF proposes to allow residential development to completely encircle the Bacchus Marsh Irrigation District (BMID).</p> <p>There has been a recent research project, <i>Foodprint Melbourne</i>, that investigated what grows in Melbourne's city fringe foodbowl, identifies the vulnerabilities in the city's food supply, and identifies the importance of Melbourne's foodbowl for a more resilient and sustainable food future for the city.</p> <p>Numerous studies have identified that there are edge / interface problems between urban growth and agricultural operations.</p> <p>It is unclear from the UGF what sort of buffer would be provided to minimise conflict and to protect the viability of farming. Have any studies been undertaken to measure noise from the existing farming practice, and to measure dust and pesticide drift to establish an appropriate buffer area where residential development should be prohibited to ensure that farming practice in the BMID is not placed in jeopardy? If urban development is permitted around the entire perimeter of the BMID, an Urban Growth Boundary should be applied to it, and tight controls put in place to establish a healthy buffer between the urban areas and the BMID. MCC supports the preparation of an agricultural strategy to protect land within the BMID. This work should be undertaken prior to the finalisation of the UGF to inform the appropriate setback distance of the residential precincts from the BMID area to protect</p>	<p><u>Bacchus Marsh Irrigation District:</u></p> <p>The UGF identifies future growth precincts in appropriate locations, however, it needs to be emphasised that these are essentially investigation areas. Future PSPs will need to identify urban zone boundaries that respond appropriately to the Moorabool Planning Scheme, the precinct planning principles expressed in the UGF, and any additional constraints identified in the further detailed technical investigations (e.g. environmental values/risks, heritage values, infrastructure).</p> <p>As per the exhibited <i>Growth Areas Framework Plan Background Investigations</i> report (section 4), a wide body of strategic work has been undertaken by Council and other agencies that underpins the UGF. Such work includes a <i>Bacchus Marsh Agricultural Assessment</i> (RMCG, 2017), which assesses agricultural land capability throughout the Bacchus Marsh district.</p> <p>The UGF lists a number of environment objectives, one of which is:</p> <ul style="list-style-type: none"> <li>• <i>“Protect high-value agricultural land in the Bacchus Marsh Irrigation District (BMID) from encroachment by urban development.”</i></li> </ul> <p>The UGF, in Table 5 (Sequencing), identifies a project titled <i>‘BMID and agriculture’</i>, to be carried out in the short to medium term. Table 5 lists the following actions relevant to this project:</p> <ul style="list-style-type: none"> <li>• <i>“Prepare an agricultural strategy to guide revisions to the Farming Zone to protect land within the BMID and other significant farming land, and to provide strategies to manage interfaces with non-farming uses.”</i></li> </ul>

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			<p>urban neighbours from amenity impact, and to safeguard farming activity.</p> <p><u>Merrimu Precinct:</u></p> <p>In relation to the proposed Merrimu precinct it is noted that Plan 3 identifies that the escarpment is proposed to be used as the predominant boundary between the BMID and urban areas. The top of the escarpment appears to be a logical boundary as the BMID operates on the alluvial plain of the Lerderderg and Werribee Rivers and parts of its escarpment.</p> <p>MCC are concerned that there are two areas where residential development is proposed to encroach beyond the top of the escarpment and occur on the escarpment slope and potentially on the alluvial plain.</p> <p>The setback of urban development from the top of the escarpment should be informed by studies that identify noise, odour, dust, and pesticide drift patterns from agricultural activity and locates urban development at an appropriate distance to minimise amenity impact and conflict.</p> <p>The development of alluvial land in the Merrimu precinct is at odds with the following environment objective in the UGF:</p> <ul style="list-style-type: none"> <li>• Protect high-value agricultural land in the Bacchus Marsh Irrigation District (BMID) from encroachment by urban development</li> </ul>	<ul style="list-style-type: none"> <li>• <i>Investigate an appropriate planning tool, such as a precinct-specific zone, overlay or LPPF policy to provide for the long-term protection of the BMID.</i></li> <li>• <i>Assess and determine an appropriate interface to manage the BMID from urban interfaces and apply an overlay as appropriate."</i></li> </ul> <p><u>Merrimu Precinct:</u></p> <p>Escarpment areas can be included in the investigation areas, provided there is a clear precinct planning principle that escarpments are protected. The PSP process will determine actual setbacks from escarpments. There is a risk that excluding escarpments from the investigation areas would place these areas in 'no man's land' with no resolution of how these areas are managed. For instance it is probable that escarpment edges can be key components of pedestrian and bicycle networks.</p> <p>As discussed above, the future growth precincts are essentially investigation areas. Future PSPs will need to identify appropriate urban growth zone boundaries.</p> <p>The UGF lists a number of environment strategies under the heading of 'Biodiversity, heritage and open space', one of which is:</p> <ul style="list-style-type: none"> <li>• <i>"Preserve escarpments that define the edges of Bacchus Marsh valley and plateaus."</i></li> </ul> <p>It is, however, recommended that the UGF be amended by adding the following precinct planning principle for Merrimu, Parwan Station and Hopetoun Park North growth precincts:</p> <ul style="list-style-type: none"> <li>• <u>Ensure that development is set back from the top of the escarpment, to minimise impacts on landscape based on appropriate landscape sensitivity analysis as well as to limit</u></li> </ul>



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			<p>It is proposed that Merrimu would be linked to the Western Freeway via a new road 'the Eastern Link' that would cut through the BMID. It appears from the plan that this road may bisect existing farms making their operation more difficult and could result in urban / agricultural conflict through rubbish, dust and conflict through mixing agricultural vehicles (such as tractors) and urban vehicles.</p> <p>MCC would like to know what studies have been undertaken to date to justify the Eastern Link.</p>	<p><u>interface issues with agricultural land use (i.e. to avoid land use conflict).</u></p> <p>It should be noted that Action 5 in Table 3 of the UGF (p86) specifically mentions further work required to establish appropriate separation of sensitive uses from the irrigation district.</p> <p>Notwithstanding the above, it is recommended that the Merrimu future residential growth precinct be amended on Plans 1, 3, 4, 5, 6, 7 and 8, to exclude steep and heavily vegetated land to the east of Bences Road, north of Possumtail Run estate and south of Dodemaide Circuit estate.</p> <p>It is recommended that the area below the escarpment in the north-west be retained within the precinct, as this area provides opportunity for the precinct to connect with the existing urban area to the north of Darley.</p> <p>The ELR (ELR) has been identified for the past 9 years via Clause 21.07 of the Moorabool Planning Scheme. The need for the ELR was also identified in the <i>Bacchus Marsh Integrated Transport Strategy, 2015</i> (BMITS) and a recent <i>Origin-Destination Study – heavy vehicle movements</i> (Traffix, 2017).</p> <p>The State government has committed \$3M for a road corridor planning study which will likely take two to three years to complete. VicRoads is leading this study, which will identify a preferred road alignment, based upon identified constraints such as environmental values/risks, quality agricultural land, heritage, landholdings, etc.</p>

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			<p><u>Hopetoun Park and Parwan Precincts:</u></p> <p>Plan 3 in the UGF shows the Hopetoun Park and Parwan precincts being located beyond the top of the escarpment, which implies that urban development can be permitted on the slope. The top of the escarpment is a logical and defendable boundary. The setback of urban development from the top of the escarpment should be informed by studies that identify noise, odour, dust, and pesticide drift patterns from agricultural activity and locates urban development at an appropriate distance to minimise amenity impact and conflict.</p> <p>MCC recommends that the Merrimu, Hopetoun Park, and Parwan residential precincts be setback beyond the upper break of slope of the escarpments, and no development be shown on the alluvial plains or on the slopes. The setback of development from the upper break of slope should be informed by studies that identify the appropriate buffer distance to protect residents from agricultural activity (e.g. noise, dust, pesticide drift, and odour).</p> <p><u>Long Forest:</u></p> <p>Plan 3 in the UGF identifies that a substantial area of woodland that exists on private property adjoining the Long Forest Nature Conservation Area would be removed to allow urban development. The plans imply all woodland west of Pyrites Creek on private property would be removed (approximately 95 hectares of woodland).</p>	<p><u>Hopetoun Park and Parwan Precincts:</u></p> <p>Refer to above discussion regarding escarpments.</p> <p>The identified future growth precincts are not located on alluvial plains or floodplains.</p> <p><u>Long Forest:</u></p> <p>As discussed above, it is recommended that the Merrimu future residential growth precinct be amended on Plans 1, 3, 4, 5, 6, 7 and 8, to exclude steep and heavily vegetated land to the east of Bences Road, north of Possumtail Run estate and south of Dodemaide Circuit estate.</p>

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			<p>It is unclear in the UGF what extent of buffer area has been placed between the wooded areas in Long Forest and the proposed urban development to provide adequate protection from bushfire risk. Where a new community is being planned adjacent an area with bushfire threat, planning should consider an appropriate setback to minimise the threat of property by fire. MCC recommends that the existing wooded areas be retained and urban development setback from the edge of wooded areas to reduce bushfire threat.</p> <p><u>Sensitive Uses Buffer:</u></p> <p>Why hasn't the buffer interface required for sensitive uses not been applied to the full extent of area which has been identified by the sensitive use buffer mapping on Plan 4?</p> <p>On face value it would appear that residential land use (which is defined as a sensitive use) would not be permitted in the sensitive use buffer areas. It is therefore unclear why the Merrimu and Parwan residential precincts have land within areas identified in the sensitive use buffers for state significant extractive industry sites (the Maddingley Coal Mine and the Darley Sand Quarries). It would appear that residential development is proposed in areas subject to noise, dust, vibration and gas migration (where a landfill is proposed).</p>	<p>This is a matter to be considered during the future PSP process. It is recommended that the ninth precinct planning principle (UGF; page 72) be amended as follows:</p> <ul style="list-style-type: none"> <li>• “Consider interfaces with environmental assets such as Long Forest Nature Conservation Reserve and BMID, <u>to protect and enhance biodiversity values and agricultural land uses, and to aim for achieve</u> attractive development for local residents.”</li> </ul> <p>It is recommended that the second dot point under the headings ‘Detailed planning considerations’ – ‘Defining the eastern edge by the Long Forest Nature Conservation Reserve’ (page 73) be amended as follows:</p> <ul style="list-style-type: none"> <li>• “Ensure residential densities, siting and design respond appropriately to bushfire risk <u>and the principle of protecting and enhancing biodiversity values.</u>”</li> </ul> <p><u>Sensitive Uses Buffer:</u></p> <p>The clear intent is that no sensitive uses (not just residential) will be allowed within buffer interface areas. The UGF terms of reference specifically mention protection and management of State significant resources. The Bacchus Marsh district (as defined in the UGF) has three of these, including the BMID, Darley sand quarries, and the Maddingley Waste and Resource Recovery (WRR) Hub. DELWP unconditionally authorised Amendment C81 because the UGF and updated MSS are clearly focused on the management of each of these significant resources. Indeed, the UGF and updated MSS provide better protection for these resources, with a significant investment in buffer studies.</p> <p>It is recommended that:</p>

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			<p>If the land identified as being unsuitable for residential use was excised from the Parwan precinct, a third of the precinct would be removed, which could jeopardise the viability of this area supporting a railway station, school, and retail centre as shown in Plan 6.</p> <p>It is noted that the UGF has actions relating to working with the Department of Economic Development, Jobs, Transport and Resources to confirm appropriate buffers to the extractive industries in Maddingley and Darley. MCC recommend that this work be undertaken before the UGF is adopted and inserted into the Moorabool Planning Scheme, as this may reduce the size of the proposed residential precincts (particularly the Parwan residential precinct), and necessitate the inclusion of land in alternative locations to meet projected population growth.</p> <p><u>Housing and Community Facilities:</u></p> <p>The UGF on Plan 6 identifies that the Merrimu and Parwan residential precincts may be of sufficient size to support education, retail, and health and community facilities. It is unclear in the UGF whether there have been calculations undertaken to determine a theoretical</p>	<ul style="list-style-type: none"> <li>• The UGF (including relevant plans) and the exhibited MSS Clause 21.07 be amended, to make it clear that sensitive uses are not permitted within the buffer interface areas.</li> <li>• The UGF and exhibited MSS clauses be amended to include an action for a planning study to be undertaken (in the short term) for the Maddingley WRR Hub site and associated amenity buffer area, to determine appropriate planning zone and overlay controls (see response to submission 21).</li> <li>• The UGF and exhibited MSS clauses be amended to clarify that future land uses will only be allowed to establish within the designated buffer interface areas if it can be demonstrated that any offsite amenity impacts will be contained within the buffer interface.</li> </ul> <p>This is not the case. See above comments. Council will continue to work with the operator of the Maddingley WRR Hub, the EPA, DEDJTJ and other agencies, to ensure appropriate controls are put in place. The significant work undertaken by Pacific Environment (<i>Bacchus Marsh UGF – Bacchus Marsh Odour Assessment, 2017</i>), comprising odour modelling and field testing, advances much of the work required. One of the key actions for the UGF will be to identify ongoing work in resolving whether ESO or other controls should be applied to the Maddingley WRR Hub site. This can only be done in a collaborative manner between all key stakeholders.</p> <p><u>Housing and Community Facilities:</u></p> <p>There have been calculations undertaken to confirm indicative size of populations in Merrimu and Parwan Station. These are not included in the UGF because the numbers will likely change as part of preparing Urban Growth Zones and PSPs.</p>

Submission Number	Affected Property/ Agency	Submitter's Position	Submission Summary	Council Officer Recommendations/Comments (N.B. Underlining indicates added text. Strikethrough indicates deleted text.)																				
			<p>number of dwellings and population to determine whether these areas will have sufficient population to support this community infrastructure.</p> <p>MCC would like information on the projected populations for these areas to determine what level of community infrastructure may be delivered and size of retail centres in these precincts to determine whether any shortfalls (or over provision of retail space) will impact the City of Melton.</p> <p><u>Merrimu Major Activity Centre:</u></p> <p>Given that the UGF has not provided information on populations of the proposed residential precincts, and it is identified that sections of Merrimu have estates that limit future growth, it is surprising that Plan 6 in the UGF states that Merrimu will be able to support three activity centres (a local centre, a neighbourhood centre, and a major centre).</p> <p>MCC would like information on the projected population of Merrimu to determine whether a major activity centre in Merrimu is supported, as this is in close proximity to activity centres in Melton Township and could have a detrimental impact on their operation (Woodgrove Shopping Centre and High Street, Melton).</p>	<p>At this point the numbers are as below (based on VPA projections):</p> <table border="1" data-bbox="1395 416 2136 746"> <thead> <tr> <th>AREA</th> <th>TOTAL ESTIMATED POPULATION</th> <th>SCALE OF AREA</th> <th>FACILITIES TYPE (PER POPULATION)</th> </tr> </thead> <tbody> <tr> <td>Bacchus Marsh existing urban area (comprising Darley and Maddingley)</td> <td>32,000 people</td> <td>Large regional centre</td> <td>Centre-based facilities (1 per 30,000)</td> </tr> <tr> <td>Potential Merrimu Residential Precinct</td> <td>11,400 – 17,100</td> <td>Regional centre</td> <td>Municipal-level facilities (1 per 20,000)</td> </tr> <tr> <td>Potential Parwan Station Precinct</td> <td>8,400 – 12,300</td> <td>Large district centre</td> <td>District-level facilities (1 per 10,000)</td> </tr> <tr> <td>Hopetoun Park and the potential Hopetoun Park North Precinct</td> <td>1,900 – 3,200</td> <td>District town</td> <td>Local-level facilities (1 per 5,000)</td> </tr> </tbody> </table> <p><b>Table 1:</b> Residential Growth Areas Settlement Types (*depending on final extent of buffers to nearby uses)</p> <p><u>Merrimu Major Activity Centre:</u></p> <p>In a regional context, it is not considered that provision of activity centres will have any impact on the City of Melton's interests. Indeed, as the adopted Moorabool Shire Council Retail Strategy 2041 (2016) shows, there is significant escape expenditure (see Fig. 2 below) out of Bacchus Marsh into Melton. This can and should be addressed, consistent with Bacchus Marsh providing a regional growth centre role (see Plan Melbourne).</p> <p>Assuming a ratio of one neighbourhood activity centre (NAC) per 10,000 people, Merrimu could support two NACs. It is concurred that it would be unlikely to support a major activity centre (MAC) which likely needs &gt;35,000 residents. Bacchus Marsh town centre would provide that role.</p> <p>It is recommended that the UGF (including Plan 6) be amended to more closely align these ratios and expectations.</p>	AREA	TOTAL ESTIMATED POPULATION	SCALE OF AREA	FACILITIES TYPE (PER POPULATION)	Bacchus Marsh existing urban area (comprising Darley and Maddingley)	32,000 people	Large regional centre	Centre-based facilities (1 per 30,000)	Potential Merrimu Residential Precinct	11,400 – 17,100	Regional centre	Municipal-level facilities (1 per 20,000)	Potential Parwan Station Precinct	8,400 – 12,300	Large district centre	District-level facilities (1 per 10,000)	Hopetoun Park and the potential Hopetoun Park North Precinct	1,900 – 3,200	District town	Local-level facilities (1 per 5,000)
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Hopetoun Park and the potential Hopetoun Park North Precinct	1,900 – 3,200	District town	Local-level facilities (1 per 5,000)																					

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				<p>The ultimate mix of activity centres will need to be determined by economic analysis as part of the future PSP process.</p> <p>Below are some relevant extracts from the Retail Strategy.</p> <p>expenditure is escaping the municipality. The amount of retail expenditure escaping Moorabool by retail category, having regard to recent customer telephone survey conducted by AFS (Australian Fieldwork Solutions), is estimated as follows:</p> <ul style="list-style-type: none"> <li>• Around 30% for spending on FLG (i.e. supermarkets, bakeries, butchers);</li> <li>• 20 – 25% for food catering spending (i.e. cafés, restaurants);</li> <li>• 70 – 75% of apparel spending (i.e. clothing, footwear);</li> <li>• 80 – 85% of household goods spending (i.e. hardware, electrical goods);</li> <li>• 70 – 75% of leisure goods spending (i.e. stationary, books, sports);</li> <li>• 55 – 60% of general retail spending (i.e. pharmacy, florist); and</li> <li>• 40 – 45% of retail services (i.e. hairdressing, beauty).</li> </ul> <p><b>Figure 2: Escape Expenditure</b></p>

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				<p><b>Retail floorspace demand and supply</b></p> <p>The provision of retail floorspace per person throughout Australia at present is estimated at around 2.2 sq.m. The indicative total retail floorspace demand by residents of Moorabool, based on a population of 31,200, is estimated at approximately 69,000 sq.m (26,350 sq.m of food and 42,780 of non-food). Much of this demand is, and will continue to be, satisfied by the broader and larger provisions of retail facilities located beyond Moorabool, such as those at Melton, Ballarat and Melbourne.</p> <p>The retail floorspace supply within Moorabool is estimated at approximately 31,200 sq.m, based on a survey completed by MacroPlan Dimasi in September 2014. The majority of this floorspace, some 80%, is located within the Bacchus Marsh region, mostly within the Bacchus Marsh Town Centre which includes The Village Bacchus Marsh, a sub-regional shopping centre anchored by Coles and Aldi supermarkets and a small Target Country; a Foodworks supermarket; and a large number of food and non-food specialty stores.</p> <p><b>Figure 3:</b> Retail floor demand – acknowledges the role of Melton</p>

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			<p><u>Lack of Connectivity between Bacchus Marsh and the Urban Growth Precincts:</u></p> <p>MCC would like information on the projected populations of the urban growth precincts and the work that has been undertaken to identify the development of an east-west arterial road network to support the projected growth in population. MCC would particularly like information on whether upgrades would be required to roads that connect Moorabool to the City of Melton. MCC are concerned that the development in Merrimu would increase the volume of traffic at the Western Freeway / Bacchus Marsh Road intersection.</p>	<p><b>Guideline supportable floorspace</b></p> <p>A baseline 'guideline' supportable retail floorspace in Moorabool, which is a theoretical supportable floorspace provision if a better range of retail facilities were offered, is estimated based on retention rates assumed to be achievable. It is estimated that around 80% of FLG spending, some 60-70% of spending on food catering, general retail and retail services, and between 40% - 50% of spending on other non-food goods can be retained within Moorabool. In total, around 65% of total retail expenditure is estimated to be potentially retained within Moorabool if a wider range of retail facilities are provided in line with the Shire's growing population.</p> <p>The current guideline supportable retail floorspace in Moorabool is estimated at around 45,500 sq.m, indicating that there is currently a shortfall of retail floorspace in the municipality of some 14,300 sq.m. This gives a broad estimate of the quantum of floorspace supportable and should be viewed as indicative only. As the population of Moorabool increases, the indicative undersupply of retail floorspace is estimated to increase to around <u>40,000</u> sq.m by 2031, and to approach <u>55,000</u> sq.m by 2041 if no further additions were to be made.</p> <p><b>Figure 4:</b> Proposed retail floor targets</p> <p><u>Lack of Connectivity between Bacchus Marsh and the Urban Growth Precincts:</u></p> <p>See earlier comments on projected population. The UGF includes a number of transport objectives and strategies (page 61). Some of the objectives include:</p> <ul style="list-style-type: none"> <li>• Provide a connected and efficient arterial road network.</li> <li>• Maintain the Western Freeway as the key east-west link across Bacchus Marsh and as a scenic route to be the Central Highlands Region gateway.</li> <li>• Improve the accessibility and capacity of the train service.</li> <li>• Improve and expand bus coverage to key existing and future destinations.</li> </ul>



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			<p>The Western Freeway / Bacchus Marsh interchange should be improved if the Merrimu residential precinct was approved to remove the acute angle and provide an on ramp to the Freeway to reduce reliance on the back road between Melton Township and Bacchus Marsh (Anthony's Cutting). Given that access to the centre of Bacchus Marsh and the Bacchus Marsh train station will be difficult from Merrimu it is likely that some of these residents will travel to Melton Township and Melton train station through Anthony's Cutting to access goods and services.</p>	<ul style="list-style-type: none"> <li>• Facilitate walking and cycling as viable transport modes.</li> <li>• Strengthen the potential for road networks to manage local traffic movement.</li> </ul> <p>Some of the key relevant transport strategies include:</p> <ul style="list-style-type: none"> <li>• Plan for a complete grid network that facilitates efficient through and cross-town movements.</li> <li>• Plan for well-connected new growth areas that offer multimodal trips.</li> <li>• Work with VicRoads and key stakeholders to deliver actions indicated in the Integrated Transport Strategy to manage existing road congestion and facilitate multimodal movement within Bacchus Marsh.</li> <li>• Work with VicRoads and relevant state agencies to confirm the alignment, funding, delivery and construction of the ELR.</li> </ul> <p>The UGF emphasises the importance of the future ELR (ELR), for removing through-traffic (particularly heavy vehicles) from the centre of Bacchus Marsh, and also for providing critical connectivity between the future growth precincts, particularly Merrimu, Parwan Station and PEP. The ELR will ultimately provide connectivity with the Western Freeway, thereby alleviating dependence on the Old Western Highway.</p> <p>Future growth precincts will need to be provided with a comprehensive bus network, including park-and-ride bus stations co-located with activity centres, the existing train station at Bacchus Marsh and the future planned station within Parwan Station precinct (refer to response to submission 44 [Transport for Victoria, or TfV] for further details). It is unlikely that the future growth precincts will have any significant effects on Melton station; which will in any event need to be upgraded as part of the rapid growth of Melton, the planned track duplication and future electrification (metro level service).</p>

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			<p><u>Parwan Employment Precinct:</u></p> <p>The Parwan Employment Precinct (PEP) is identified as a high value agricultural activity area in the UGF. It is identified as being suitable for meat processing, feed lots, saleyards, mushroom growing, poultry and hydroponics.</p> <p>Given that the PEP is proposed to be an agribusiness area, MCC are concerned that the UGF proposes that the PEP be rezoned to the Urban Growth Zone (UGZ). All the uses supported within the PEP appear to be Section 1 or 2 Uses in the existing zones (Farming Zone and Special Use Zone – Schedule 1). If there is a concern that the proposed uses may be Section 3 (prohibited) uses in the existing zone, the area could be rezoned to a suitable agricultural zone to permit the prohibited uses. Consideration should be given to the use of other planning tools such as the development of</p>	<p>For background information on transport studies, refer to page 21 of the <i>Growth Areas Framework Plan Background Investigations</i> report (see Table 2 below):</p> <table border="1" data-bbox="1408 477 2078 719"> <tr> <td data-bbox="1408 477 1514 576">Transport</td> <td data-bbox="1514 477 1722 576">Bacchus Marsh Integrated Transport Strategy (MSC)</td> <td data-bbox="1722 477 1827 576">Completed 2015</td> <td data-bbox="1827 477 2078 576">Identifies a range of initiatives from finalising the Eastern Link Road alignment through to local upgrades to manage local congestion within Bacchus Marsh.</td> </tr> <tr> <td data-bbox="1408 576 1514 639"></td> <td data-bbox="1514 576 1722 639">Moorabool Hike and Bike Strategy (SGL)</td> <td data-bbox="1722 576 1827 639">Completed 2014</td> <td data-bbox="1827 576 2078 639">Identifies a range of pedestrian and bicycle infrastructure priorities in Bacchus Marsh.</td> </tr> <tr> <td data-bbox="1408 639 1514 719"></td> <td data-bbox="1514 639 1722 719">Origin-Destination Study – heavy vehicle movements (Trafix)</td> <td data-bbox="1722 639 1827 719">Commissioned mid 2017</td> <td data-bbox="1827 639 2078 719">Models heavy vehicle movements around Bacchus Marsh and is a key input into future planning of Parwan PSP and Eastern Link.</td> </tr> </table> <p><b>Table 2:</b> Background investigations and strategies relating to transport</p> <p><u>Parwan Employment Precinct:</u></p> <p>It is acknowledged that the Urban Growth Zone (UGZ) may not be the most appropriate zone to apply across the PEP. As per the exhibited <i>Growth Areas Framework Plan Background Investigations</i> report (Table 2), Council has commissioned a business case and a planning study for the PEP. This body of work will help to inform future planning for the PEP.</p> <p>It is recommended that the actions relating to Parwan Employment Growth Precinct in Table 5 in the UGF be amended as follows:</p> <ul style="list-style-type: none"> <li>• <del>Rezone to UGZ and p</del>Prepare and implement a PSP, and rezone land in accordance with the PSP.</li> <li>• Undertake a buffer assessment and apply an ESO as appropriate.</li> <li>• In the PSP, or as a separate overlay, prepare a land use and amenity plan that manages potential future land use incompatibilities.</li> </ul>	Transport	Bacchus Marsh Integrated Transport Strategy (MSC)	Completed 2015	Identifies a range of initiatives from finalising the Eastern Link Road alignment through to local upgrades to manage local congestion within Bacchus Marsh.		Moorabool Hike and Bike Strategy (SGL)	Completed 2014	Identifies a range of pedestrian and bicycle infrastructure priorities in Bacchus Marsh.		Origin-Destination Study – heavy vehicle movements (Trafix)	Commissioned mid 2017	Models heavy vehicle movements around Bacchus Marsh and is a key input into future planning of Parwan PSP and Eastern Link.
Transport	Bacchus Marsh Integrated Transport Strategy (MSC)	Completed 2015	Identifies a range of initiatives from finalising the Eastern Link Road alignment through to local upgrades to manage local congestion within Bacchus Marsh.													
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	Origin-Destination Study – heavy vehicle movements (Trafix)	Commissioned mid 2017	Models heavy vehicle movements around Bacchus Marsh and is a key input into future planning of Parwan PSP and Eastern Link.													

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			<p>a land use and amenity plan for the area, and then developing a suite of zones and / or overlays to the area in line with the recommendations of the plan.</p> <p>MCC supports this remaining as an agricultural area, and retain its zoning for agricultural purpose. It is confusing for this agricultural area to be shown as an employment area in the UGF, as this implies that it will be developed for urban purposes. MCC recommends that the wording of the UGF be strengthened so it is clear that this area will not be urban, and will continue to be agricultural in nature.</p> <p><u>Application of an Urban Growth Boundary:</u></p> <p>MCC has provided ongoing support in submissions on other matters in Moorabool for the development of an Urban Growth Boundary (UGB) for Bacchus Marsh. MCC are concerned that the UGF does not define the location of a UGB around Bacchus Marsh. We recommend that the UGF show a UGB and this should exclude the Parwan Employment Precinct.</p>	<p>It is recommended that the exhibited MSS Clause 21.07-7 be amended as follows:</p> <ul style="list-style-type: none"> <li>Apply the Urban Growth Zone to the investigation areas at <u>Merrimu, and Parwan Station and Parwan Employment Precinct.</u></li> </ul> <p>It is recommended that the exhibited MSS Clause 21.07-8 be amended as follows:</p> <ul style="list-style-type: none"> <li><u>Prepare a land use and amenity plan for Parwan Employment Precinct that manages potential future land use incompatibilities.</u></li> </ul> <p><u>Application of an Urban Growth Boundary:</u></p> <p>The Urban Growth Boundary (UGB) in a Victorian planning context is a planning tool which defines the planned extent of urban development in metropolitan Melbourne. Consequently, it also defines the 'green wedge' within metropolitan fringe planning schemes, in accordance with section 46AC of the <i>Planning and Environment Act 1987</i> (the Act).</p> <p>The Act requires that any amendment to a metropolitan fringe planning scheme to change a UGB be ratified by both houses of the Victorian Parliament.</p> <p>The Act does not specifically provide for the use of a UGB outside of metropolitan fringe planning schemes. Therefore any boundary expressed through the Bacchus Marsh UGF would be an articulation of a policy position, rather than a statutory tool in the form of a UGB in metropolitan Melbourne.</p> <p>Whilst it would be considered desirable to define a settlement boundary to Bacchus Marsh, it would be premature to</p>

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			<p><u>Proposed Changes to Clause 21 in the Moorabool Planning Scheme:</u></p> <p>MCC generally support the proposed ordinance update, however we request the Bacchus Marsh UGF and Clause 21 be updated to reflect the comments above.</p>	<p>specifically define a boundary as part of the UGF. Certain actions identified within the UGF will need to be undertaken before an appropriate location for a settlement boundary can be determined.</p> <p>It is recommended that the following project be added to Table 4 (Key growth actions - local):</p> <ul style="list-style-type: none"> <li>• Define a settlement boundary for the Bacchus Marsh district and incorporate this into the Local Planning Policy Framework of the Moorabool Planning Scheme following the completion of the following actions: <ul style="list-style-type: none"> <li>○ Merrimu Precinct PSP</li> <li>○ Parwan Station Precinct PSP</li> <li>○ Hopetoun Park North Precinct rezoning</li> <li>○ Maddingley Employment Investigation Area - planning study.</li> </ul> </li> </ul> <p><u>Proposed Changes to Clause 21 in the Moorabool Planning Scheme:</u></p> <p>Refer to comments above.</p>

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7	N/A  Sustainability Victoria (SV)	Comments only	<p>SV's considerations relate to the proximity of the development to the Maddingley Brown Coal site – (coal mine, waste and resource recovery site) located within the precinct at East Maddingley Road, Bacchus Marsh.</p> <p><u>Context:</u></p> <p>SV is one of the Victorian Government's agencies delivering waste management and resource efficiency programs, with a key role in long-term state-wide planning for waste and resource recovery infrastructure. SV works in partnership with the seven regional waste and resource recovery groups, and of particular relevance to Amendment C81, the Grampians Central West Waste and Resource Recovery Group (GCWWRRG).</p> <p>The <i>Environment Protection Act 1970</i> (the Act) established the Victorian Waste and Resource Recovery Infrastructure Planning Framework (the Framework). The Act includes a number of objectives for the Framework, but of particular importance to Amendment C81 is the following:</p>	<p>Noted.</p> <p>This is recognised. The UGF acknowledges that the Maddingley Waste and Resource Recovery (WRR) Hub is a State significant facility. It is, however, recommended that the significance of the WRR be further emphasised where appropriate; e.g. on Plan 1.</p> <p>It is also recommended that the exhibited MSS Clause 21.04-1 (Economic Development and Employment – Key Issues and Influences - Industry) be amended by adding the following:</p> <p><u>There are a number of state-significant natural resources and export-based industries that make significant employment and economic contributions to Bacchus Marsh, including:</u></p> <ul style="list-style-type: none"> <li>• <u>Bacchus Marsh Irrigation District</u></li> <li>• <u>Darley/Coimadai sand quarries</u></li> <li>• <u>Maddingley Waste and Resource Recovery Hub (including coal resources)</u></li> </ul> <p><u>While these businesses provide a huge opportunity for Bacchus Marsh and the shire more broadly, there are off-site impacts that need to be managed.</u></p> <p>Noted.</p>

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			<p>50A: Objectives of the Victorian Waste and Resource Recovery Infrastructure Planning Framework:</p> <p>The objectives of the Victorian Waste and Resource Recovery Infrastructure Planning Framework are:</p> <p>(c) To enable waste and resource recovery infrastructure planning to be</p> <p style="padding-left: 40px;">(i) effectively integrated with land use and development planning and policy;..</p> <p>This objective underpins our submission, and highlights the importance of the proper recognition of the Framework in Amendment C81.</p> <p>The Framework is made up by the Statewide Waste and Resource Recovery Infrastructure Plan (Statewide Plan), and seven Regional Waste and Resource Recovery Implementation Plans. The Statewide Plan (2015) was prepared by SV. The Grampians Central West Waste and Resource Recovery Implementation Plan (GCW Implementation Plan), prepared by the GCWWRRG, was published July 2017. SV has recently amended the Statewide Plan and is to be approved by the Minister for publication in 2018.</p> <p>The purpose of the Statewide Plan is:</p> <p style="padding-left: 40px;"><i>To provide strategic direction for the management of waste and resource recovery infrastructure to achieve an integrated system that effectively manages the expected mix and volumes of waste, reflects the principles of environmental justice to ensure that impacts on the community, environment and public health are not disproportionately felt, supports a viable</i></p>	<p>It is recommended that the UGF (e.g. Element 2 – Employment) and exhibited MSS clauses be amended where appropriate, to recognise the importance of the Victorian Waste and Resource Recovery Infrastructure Planning Framework, and its relevance to the Maddingley WRR Hub.</p> <p>Noted.</p>

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			<p><i>resource recovery industry and reduces the amount of valuable materials going to landfill. [p17]</i></p> <p>This purpose translates into the 30 year goals of the Statewide Plan, including:</p> <ol style="list-style-type: none"> <li>1. Landfills will only be for receiving and treating waste streams from which all materials that can be viably recovered have been extracted.</li> <li>2. Materials are made available to the resource recovery market through aggregation and consolidation of volumes to create viability in recovering valuable resources from waste.</li> <li>3. Waste and resource recovery facilities including landfills are established and managed over their lifetime to provide best economic, community, environment and public health outcomes for local communities and the state and ensure their impacts are not disproportionately felt across communities.</li> <li>4. Targeted information provides the evidence base to inform integrated statewide waste and resource recovery infrastructure planning and investment at the state, regional and local levels by industry, local government, waste and resource recovery groups, government agencies and the broader community. [p17]</li> </ol> <p><u>Waste and Resource Recovery Hubs:</u></p> <p>An integral part of delivering a cohesive and integrated waste and resource recovery system is the concept of non-exclusive waste and resource recovery hubs. A hub is a facility, or group of facilities, that manage or recover waste or material streams. Hubs are described across</p>	<p>Noted.</p> <p><u>Waste and Resource Recovery Hubs:</u></p> <p>Noted.</p>

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			<p>three levels, state, regional and local. A hub of state significance includes infrastructure that manages a range and/or volume of materials significant at the state level.</p> <p>The Statewide Plan identifies 22 hubs of state importance, including the Maddingley site. Describing these hubs reinforces the essential role played by this infrastructure, recognising that any impact on their functionality would make it difficult to manage the State's waste and resource recovery system.</p> <p>The Statewide Plan (SV 2015), makes the following observations about the hub, which is worth noting in the assessment of the growth framework:</p> <p>Maddingley Brown Coal Landfill, Bacchus Marsh:</p> <ul style="list-style-type: none"> <li>• This site accepts significant amounts of Solid Inert Waste (SIW) from the Metropolitan WRR region.</li> <li>• It is the only landfill currently accepting shredder flock. If it ceased to accept shredder flock it would severely affect reprocessing of end-of-life cars and whitegoods.</li> <li>• Functionality should be managed by preserving adequate buffers and planning that ensures the establishment of compatible activities conducted in a manner that does not impact on the community, environment and public health of surrounding land users.</li> </ul> <p>The GWC Implementation Plan includes the following description about the Hub, which is worth noting in the assessment of the growth framework:</p> <p><i>Maddingley Brown Coal Hub:</i></p>	<p>Noted.</p> <p>Noted. See comments below.</p> <p>Noted. See comments below.</p>



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			<p><i>Location: On the outskirts of Bacchus Marsh (Moorabool Shire) utilising open space and existing brown coal mine open-cut site. Close proximity to the metropolitan region and reasonable access to regional freeway</i></p> <p><i>Landfill: Operating solid inert</i></p> <p><i>Resource Recovery: Organics composting, concrete and aggregate crushing, soil screening and mulch;</i></p> <p><i>Proximity to Bacchus Marsh Transfer Station</i></p> <p><i>Buffers: Special Use Zone with two-kilometre buffer distance for composting.</i></p> <p><i>Strategic assessment including key issues and opportunities:</i></p> <ul style="list-style-type: none"> <li>• <i>Strategically located on the edge of the region and adjacent to the metropolitan region</i></li> <li>• <i>Long-term airspace availability (future stage 3 includes 4 million cubic metres of airspace)</i></li> <li>• <i>Future putrescible</i></li> <li>• <i>EfW composting EPA research</i></li> <li>• <i>Nearby industrial park</i></li> <li>• <i>Impacts of truck movements</i></li> <li>• <i>Proximity to Bacchus Marsh Transfer Station</i></li> </ul> <p><i>Note - Shredder floc is residue directly arising from large-scale shredding operations to recover metals. Shredded material includes, but is not limited to, end-of-life vehicles, white goods, machineries, drums and corrugated material.</i></p> <p>The GCW Implementation Plan also recognises that the facility is a site of state importance and indicates that the landfill component is to operate until 2034 (approximately).</p>	<p>Noted.</p>

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			<p><u>Composting land use:</u></p> <p>The Maddingley WRR hub holds EPA licence 45288, which permits: prescribed industrial waste management, landfilling, and composting. It is unclear from the licence whether the volume of composting materials permitted to be processed at any one time is limited. This may need to be considered when determining the required buffer zones from the facility.</p> <p><u>Maps provided in the Urban Growth Framework:</u></p> <p>Plan 4 – ‘Physical Constraints’, indicates a number of buffers from industry in the area. The Maddingley Brown Coal site, and composting in particular, appear to have several buffers, which is confusing and should be clarified.</p> <p>Plan 7 – ‘Transport and Movement’, indicates the various proposed land uses as well as transport routes. The proposed residential and commercial precinct appear to be within the composting buffer. A future investigation area / transition precinct is also indicated, but it is unclear whether sensitive uses may be envisaged for this area. We acknowledge that Clause 21.07 of the Moorabool Planning Scheme stipulates industrial development west of the WRR Hub; however, SV recommends that no sensitive uses be proposed through the urban growth framework within the buffer zones in order to protect the integrity of the industry,</p>	<p><u>Composting land use:</u></p> <p>Noted. See comments below.</p> <p><u>Maps provided in the Urban Growth Framework:</u></p> <p>It is recommended that the UGF (particularly Plan 4) be amended to show only one sensitive use buffer for the Maddingley WRR Hub, which measures 2.0 km from the current composting operations approved under EPA licence 45288 (as amended on 22/11/2017). There is no need to show buffer requirements for other uses at this site, such as coal mining and landfill, as these are contained within the 2.0 km buffer (see also comments below and response to submissions 13 and 21).</p> <p>It is acknowledged that the UGF Plans 1, 3, 4, 5, 6, 7 and 8 are ambiguous with respect to buffers. It is recommended that the UGF (including the legend to the above plans) be amended, to clarify the intent that no new sensitive uses are permitted within the buffer interface areas and within the Maddingley Employment Investigation Area (except for the possible future expansion of existing sensitive uses, subject to demonstrating how amenity impacts will be mitigated).</p> <p>The exhibited MSS Clause 21.04-4 includes the following strategy:</p>

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			<p>and to ensure that future residents and other potentially sensitive use are not impacted upon.</p> <p>With this in mind, SV considers that the investigation may want to focus on particular non-sensitive uses such as industry or commercial activities that may work in synergy with the Maddingley WRR Hub (e.g. an industry that may generate or utilise shredder flock waste, or other organic wastes that are accepted at the composting facility).</p> <p>This could be beneficial to facilitate transport efficiencies, as the further waste needs to be transported, the greater the cost to manage. Avoiding unnecessary transportation can make the industry more efficient. (Economic and Transport Analysis 2017).</p> <p>As previously indicated SV's proposed amendments to the SWRRIP includes some strategic considerations for decision makers to provide more guidance for the development and protection of WRR hubs. The following table could be considered to assist planning for the hub and surrounding area:</p>	<ul style="list-style-type: none"> <li>• <i>Avoid sensitive uses within recommended separation distances from the Maddingley Brown Coal Mine and the Darley/Coimadai sand quarries.</i></li> </ul> <p>It is recommended that this strategy be amended as follows:</p> <ul style="list-style-type: none"> <li>• <i>Avoid sensitive uses within recommended separation distances from <u>existing industrial uses, such as the Maddingley Waste and Resource Recovery Hub</u> <del>Brown Coal Mine and</del>, <u>the Darley/Coimadai sand quarries and the Bacchus Marsh Recycled Water Plant.</u></i></li> </ul> <p>Agreed. It is recommended that the UGF be amended to note the potential for synergies between future land uses and the Maddingley WRR Hub, in areas within close proximity to the WRR Hub.</p> <p>Noted.</p>

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			<p><u>Planning for WRR should consider the following where relevant:</u></p> <ul style="list-style-type: none"> <li>• integrating transport systems and land use planning to encourage appropriate development of hubs and transport networks</li> <li>• encouraging industries that work in synergy, and facilitating economies of scale through planning policy and other strategic policy directions</li> <li>• the future capacity, or lifespan of hubs and regional priorities when strategically planning within and/or near hubs</li> <li>• establishing adequate buffers from facilities with the EPA, or in line with relevant EPA guidelines</li> <li>• whether a planning mechanism such as an overlay or similar is appropriate to ensure suitable land uses, where buffers are required</li> <li>• encouraging resource recovery land uses through planning policy and planning scheme amendments, where appropriate</li> <li>• determining whether waste and resource recovery should be considered through planning scheme amendments, including amendments to Municipal Strategic Statements.</li> </ul> <p>The GCW Implementation Plan includes the following strategic objectives and priority actions, which are worth noting to ensure the sustainability of WRR in the region into the future.</p> <p><i>Priority Action 1 - Assess and, where viable, support the development of solutions and systems to increase the recovery of priority materials.</i></p>	<p>Noted. The Maddingley WRR Hub site is currently within the Special Use Zone Schedule 1 (Coal Mining), which has the following stated purpose:</p> <ul style="list-style-type: none"> <li>• To recognise and provide for the use and development of land for coal mining.</li> <li>• To provide for use of the land compatible with the primary purpose of the zone.</li> <li>• To ensure that mining operations are carried out in an orderly manner and with due regard to the surrounding environment and adjacent land uses.</li> <li>• To encourage land management practice and rehabilitation that minimises adverse impact on the use and development of nearby land.</li> <li>• To ensure that use and development occurs in accordance with any endorsed Management Plan and Development Plan.</li> </ul> <p>The current zone provisions fail to recognise the role of the site as a State-significant waste and resource recovery hub. As per comments below, it is recommended that a planning study be undertaken (in the short term) for the Maddingley WRR Hub site and associated amenity buffer area, to determine appropriate planning zone and overlay controls.</p> <p>Agreed. It is recommended that the UGF and relevant MSS clauses be amended, to capture the intent of these priority actions as deemed relevant to the Maddingley WRR Hub.</p>

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			<p><i>Recovery of the majority of resource materials is lower in the region compared to the state trends. This is evident in areas such as organics, timber, tyres, aggregates, plastics and electronic waste (E-waste), which could be significantly improved.</i></p> <p>The current waste and recovery statistics for the Grampians Central West WRR region are as follows:</p> <ul style="list-style-type: none"> <li>• <i>The region only recovers around 13 per cent of materials through reprocessors.</i></li> <li>• <i>The majority of councils in the region do not currently collect kerbside organic garden material, which means it is therefore currently being placed in landfill. It is estimated that at least 41,000 tonnes of organic materials are being placed in landfill every year.</i></li> </ul> <p>Table 3A priority actions:  <i>1.2 Facilitate discussions with the waste and resource recovery industry to investigate opportunities for resource recovery improvements.</i></p> <p><i>1.5 Investigate and, where viable, inform and facilitate opportunities to increase recovery of priority materials, including organics, timber, tyres, aggregates, E-waste, glass, and textiles.</i></p> <p>The above priority actions reiterate the importance of maintaining and improving resource recovery facilities in the region, such as the Maddingley WRR hub. There is also a focus on the recovery of priority materials including organics.</p> <p>Ballarat and Moorabool have the highest generation of waste, which will likely continue into the future. Moving</p>	<p>Noted.</p> <p>Noted.</p>

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			<p>forward, this places importance on the location of the Maddingley WRR Hub, which is in close proximity to both of these local government areas.</p> <p>SV considers that the WRR Hub is critical infrastructure, and in recognising the importance of this essential infrastructure, SV draws your attention to the objectives of planning in Victoria, under the <i>Planning and Environment Act 1987</i>:</p> <p>4 Objectives: The objectives of planning in Victoria are:</p> <ul style="list-style-type: none"> <li>(a) to provide for the fair, orderly, economic and sustainable use, and development of land;</li> <li>(b) to provide for the protection of natural and man-made resources and the maintenance of ecological processes and genetic diversity;</li> <li>(c) to secure a pleasant, efficient and safe working, living and recreational environment for all Victorians and visitors to Victoria;</li> <li>(d) to conserve and enhance those buildings, areas or other places which are of scientific, aesthetic, architectural or historical interest, or otherwise of special cultural value;</li> <li>(e) to protect public utilities and other assets and enable the orderly provision and co-ordination of public utilities and other facilities for the benefit of the community;</li> <li>(f) to facilitate development in accordance with the objectives set out in paragraphs (a), (b), (c), (d) and (e);</li> <li>(g) to balance the present and future interests of all Victorians.</li> </ul>	Noted.

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			<p>In this context SV is seeking to work with the Victorian Planning Authority and Council so that the urban development can occur, while ensuring appropriate development controls over land within the buffer areas to ensure community health and amenity are not impacted, whilst also not compromising the function of this hub.</p> <p><u>Planning Mechanism to Establish Buffers:</u></p> <p>Recognition of the buffers would not only provide clarity for the community, it would also provide the additional benefit of clearly illustrating the location of the hub for proponents of proposals, including those not strictly sensitive uses. Some such uses may still be incompatible with a waste and resource recovery hub. Clear illustration ensures proponents are fully informed and aware of the hub before pursuing development proposals. There are a range of planning mechanisms, however from SV's experience an Environmental Significance Overlay (ESO) or Design and Development Overlay (DDO) may be most appropriate to identify buffer zones.</p> <p>Opportunities:</p> <p>As noted in its purpose, the State-wide Plan aspires for increasing levels of resource recovery, with landfills only receiving and treating waste streams from which all materials that can be recovered are extracted. The types of activities that deliver resource recovery are many and varied, and many would be sited appropriately within industrial zones. Resource recovery is also a valuable source of employment. A 2009 report</p>	<p>Noted.</p> <p><u>Planning Mechanism to Establish Buffers:</u></p> <p>Agreed. It is recommended that a planning study be undertaken (in the short term) for the Maddingley WRR Hub site and associated amenity buffer area, to determine appropriate planning zone and overlay controls. All key stakeholders need to be engaged in this process, including (but not limited to) the operator of Maddingley WRR Hub, EPA, SV, Grampians Central West Waste and Resource Recovery Group (GCWWRRG), Metropolitan Waste and Resource Recovery Group (MWRRG), DEDJTR, VPA and affected landowners.</p> <p>Initial discussions with GCWWRRG and MWRRG suggest that ESO controls are one possible tool that can be used.</p> <p>Agreed. It is recommended that the UGF and relevant MSS clauses be amended, to capture the intent of the priority actions from the GCW Implementation Plan, as deemed relevant to the Maddingley WRR Hub.</p>

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			<p>by Access Economics (now Delloitte Access Economics) found that for every 10,000 tonnes of waste re-processed 9.2 jobs are created (comparing to the same amount of waste landfilled generating only 2.8 jobs). Two factors that contribute to the viability of resource recovery are the availability of suitably zoned land and access to the transportation network. The Bacchus Marsh Growth Area has the potential for both, with the added benefit of proximity to an existing hub. The Framework Plan provides an opportunity to promote the development of resource recovery. This could sit comfortably in the framework, and investigation areas to recognise the location of the state significant WRR hub as an opportunity. This would also be inline with the vision of the framework.</p> <p>Vision: - planning for new employment areas to grow the local economy.</p> <p><u>Summary of suggested changes:</u></p> <p>SV recommends:</p> <ul style="list-style-type: none"> <li>• That an appropriate organics buffer be determined in consultation with the EPA.</li> <li>• That any 'sensitive uses' be prohibited within the buffers areas, to ensure the sustainability of established industry, and so that future communities are not impacted upon.</li> </ul>	<p>Agreed. Discussions with the EPA have indicated that the buffer distance from composting operations should be at least 2.0km, which is consistent with the Grampians Central West Waste and Resource Recovery Implementation Plan.</p> <p>Agreed. It is recommended that the UGF (including relevant plans) and the exhibited MSS Clause 21.07 be amended, to make it clear that sensitive uses are not permitted within the buffer interface areas or within the Maddingley Employment Investigation Area (except for the possible future expansion of existing sensitive uses, subject to demonstrating how amenity impacts will be mitigated).</p>



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			<ul style="list-style-type: none"> <li>• Amendments to Plan 4 - Clarification is sought about the appropriate buffers from the industry and composting facility.</li> <li>• That the buffer distances acknowledge the activity areas of the organics facility, and the relevant landfill cells on site, in order to ascertain appropriate buffer distances.</li> <li>• Add an overlay to the Moorabool Planning Scheme to clearly identify the buffers.</li> <li>• Promote resource recovery within any new industrial areas of the growth area, particularly those areas close to the existing WRR hub, and facilitate industry that may work in synergy with the existing WRR hub.</li> </ul>	<p>Agreed. It is recommended that the UGF (e.g. Plan 4) and exhibited MSS clauses be amended to clarify the intent/purpose of sensitive use buffers.</p> <p>Agreed. Council's consultant, Pacific Environment, has advised that: <i>"Separation distances are meant to be applied to relevant activities and are not meant to be applied to a site boundary, in a general sense. The 2 km buffer distance is specifically in relation to odour from the composting activities. The separation or buffer distance for the solid inert waste landfill operations is much smaller than the composting based buffer distance."</i></p> <p>The buffer interface area shown on the UGF plans, and the UGF plan in the exhibited MSS Clause 21.07, is 2.0kms from the existing composting operations area approved under EPA Licence 45288 (as amended on 22/11/17). It is recommended that the UGF be amended to clarify this.</p> <p>Agreed. It is recommended that the UGF (e.g. Tables 1 and 3 – Key growth actions – state/regional) and exhibited MSS clauses be amended to include an action for a planning study to be undertaken (in the short term) for the Maddingley WRR Hub site and associated amenity buffer area, to determine appropriate planning zone and overlay controls (e.g. ESO, DDO). The planning study should also consider options for improved practices at the Maddingley WRR Hub, to reduce amenity buffer impacts on existing sensitive uses.</p> <p>Agreed. It is recommended that the UGF be amended to note the potential for synergies between future land uses and the Maddingley WRR Hub, in areas within close proximity to the WRR Hub.</p>

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8	Bacchus Marsh Aerodrome  CASA	Comments only	<p>CASA has no formal comment on the planning scheme, as Bacchus Marsh Airport is not regulated by CASA. The operations at the aerodrome should, however, be considered by the Council.</p> <p>CASA notes that the planning scheme includes an Airport Environs Overlay Schedule 1, which seeks to minimise risks associated with land use and development in the vicinity of the aerodrome. However, the planning scheme does not specifically identify the Obstacle Limitation Surface. CASA recommends these be referred to in the planning documents.</p>	<p>DELWP's website advises that:</p> <ul style="list-style-type: none"> <li>• <i>Protected airspace is the airspace above either Obstacle Limitation Surfaces (OLS) or Procedures for Air Navigation Services – Operations (PANS-OPS) surfaces.</i></li> <li>• <i>The Design and Development Overlay (DDO) can be applied in planning schemes to regulate the height of development in locations where buildings and other structures could intrude into protected airspace.</i></li> </ul> <p>It is recommended that the UGF be amended as follows:</p> <ul style="list-style-type: none"> <li>• Add the following to the precinct planning principles for the Parwan Employment Growth Precinct: <ul style="list-style-type: none"> <li>○ <u>Identify the obstacle limitation surface protection area (OLSPA) applicable to the environs of the Bacchus Marsh aerodrome.</u></li> </ul> </li> <li>• Amend Table 4 – Key growth actions – local – Ref. No. 13 as follows: <ul style="list-style-type: none"> <li>○ <u>Bacchus Marsh Aerodrome Masterplan, and governance process, and identification of obstacle limitation surface protection area.</u></li> </ul> </li> </ul> <p>It is recommended that the exhibited MSS Clause 21.04 (Economic Development and Employment) be amended as follows:</p> <p>Clause 21.04-6 – Implementation:</p> <ul style="list-style-type: none"> <li>• <u>Apply a Design and Development Overlay to the obstacle limitation surface protection area applicable to the environs of the Bacchus Marsh aerodrome.</u></li> </ul> <p>Clause 21.04-7 – Further Strategic Work:</p> <ul style="list-style-type: none"> <li>• <u>Identify the obstacle limitation surface protection area applicable to the environs of the Bacchus Marsh aerodrome.</u></li> </ul>

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9	N/A  Catholic Education Melbourne (CEM)	Comments only	<p>Our submission relates to the Framework in its entirety. The importance of schools and education to the future growth of the Bacchus Marsh area is referred to on at least 25 occasions. Within this important strategic document specific mention is made of both the Government and Independent/Private school sectors; however, no mention is made of the Catholic education sector.</p> <p>Further to this, Catholic Education Melbourne (CEM) was not consulted regarding future provision requirements for the wider Bacchus Marsh area during the preparation of the Bacchus Marsh UGF despite there being a strategic justification for additional Catholic schools identified in the Growth Areas Framework Plan - Background Investigations.</p> <p><u>Current and planned provision:</u></p> <p>CEM currently operates a P-6 primary school at St Bernard's which has capacity for 414 students. A current enrolment of 271 students is steadily increasing; however, enrolments remain below the underlying demand for Catholic education in the area.</p> <p>CEM forecast St Bernard's School capacity will be reached around 2021. Under current growth projections for the township, which do not include the proposed new residential areas in the UGF, forecasts indicate a need to accommodate up to a further 650 students by 2041.</p> <p>To cater for future growth and offer Catholic primary education in the north and south of Bacchus Marsh, CEM proposes to open within the next five years a new</p>	<p>Whilst the UGF acknowledges the need for additional schools in support of projected growth, it does not define the number of schools nor their distribution. The UGF is a high level strategic plan, and it is therefore appropriate that the ultimate number and location of schools is best considered as part of the preparation of future PSPs. It should be noted, however, that PSPs will not designate sites specifically for future Catholic schools. The PSPs will simply designate sites as either government or non-government schools.</p> <p>Council and the VPA will work closely with CEM to identify the full range of future school needs, through the preparation of future PSPs.</p> <p>CEM forecasts for enrolments at St Bernards Primary are noted. As yet, no sites for new non-government schools have been identified. Council will continue to assist the CEM with its investigations of potential sites in and around Bacchus Marsh and its development of a primary school at the Stonehill Estate.</p>

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			<p>primary school at a site in the Stonehill Estate in Maddingley.</p> <p>Previous discussions with Council have explored the opportunity to:</p> <ul style="list-style-type: none"> <li>• Identify a primary School site to the north of the Western Freeway</li> <li>• Proceed with opening of new Catholic Primary School in Stonehill Estate</li> <li>• Provide a Catholic secondary college offering under the auspices of the Catholic Regional College to service the Bacchus Marsh community.</li> </ul> <p><u>Background report:</u></p> <p>We note that the Bacchus Marsh Growth Areas Framework Plan - Background Investigations report prepared by Moorabool Shire Council in August 2017 identifies CEM as an important provider of education within the wider Bacchus Marsh area.</p> <p>The report identifies CEM's commitment to a full education offer on both sides of the Western Freeway in coming years.</p> <p>Further to this, a commitment is made from Council to: <i>Work closely with Catholic Education Melbourne on future planning for the independent sector north and south of the Western Freeway.</i></p>	Noted.

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			<p><u>BM UGF:</u> <u>General Comments:</u></p> <p>Despite the inclusion of Catholic Education in the background report and the commitment to work in partnership with CEM, we note that reference to the requirements of Catholic education is omitted from the draft Bacchus Marsh UGF.</p> <p>We note that the Framework includes the following statements:</p> <p><i>Advocate for more focused investment in schools - state and private sector. and</i></p> <p><i>Expanded independent and/or shared use education sector investment north and south of Western Freeway.</i></p> <p>These statements adopt similar wording to those in the Background Investigations report, however, omit Catholic education as the identified sector provider in lieu of the Independent and/or privates sector(s).</p> <p>CEM's commitment to a full educational offer north and south of the Western Freeway is included, with specific reference to Catholic education, within the Background Investigations report. It is reasonable to expect that the reference to Catholic education as the provider of education as outlined in the Backgrounds Investigations report would also be stated in the UGF unless the VPA is of the view to implement the recent policy of removing reference to non-government education providers in PSP/UGF documents.</p>	<p>Noted. It is recommended that both the UGF and background report be amended, to refer to 'non-government sector (independent and Catholic)'.</p>

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			<p>The omission of specific education providers within a UGF or PSP is consistent with information received by CEM in previous discussions with the VPA. CEM is regularly informed by the VPA that education providers are to be included in background reports only.</p> <p>In the Bacchus Marsh UGF this approach is not consistently applied. Bacchus Marsh Grammar, an Independent education sector provider, is identified on four occasions throughout the Bacchus Marsh UGF.</p> <p>The policy of the VPA to not designate specific education providers within the Bacchus Marsh UGF should be applied in a consistent manner or not at all. In other words, if reference to Bacchus Marsh Grammar is to be retained it is reasonable and equitable to expect that sites strategically justified for Catholic schools should also be designated.</p> <p><u>Optimal Planning and Provision Outcomes:</u></p> <p>CEM recommends that the VPA/Moorabool Shire Council reconsider the omitting Catholic education from the UGF. The reasons for this are simple, straightforward and well understood.</p> <p>The Victorian education system includes three sectors and funding is allocated to schools by Federal and State governments within the said sectors. These are:</p> <ul style="list-style-type: none"> <li>• Government - meeting 66% of the educational needs of the State</li> <li>• Catholic - meeting 23% of the educational needs of the State; and</li> </ul>	<p>Bacchus Marsh Grammar is an existing education facility servicing a regional catchment. The UGF acknowledges the school on this basis. The UGF does not identify specific providers for any of the future schools that will be required to service the growth proposed under the UGF.</p> <p>The changes outlined above generally address this issue; i.e. both the UGF and background report will be amended, to refer to 'non-government sector (independent and Catholic)'. The UGF is a high level strategic planning document that identifies the broad framework for future growth. It is not intended to identify specific future school requirements, or future providers, but rather to provide the broad context within which future decisions about school provision and location will be further considered (as part of future PSPs).</p> <p>The VPA and MSC will work closely with a range of future education providers, and in particular the CEM, to identify specific future school requirements as part of the preparation of future PSPs. Consistent with the VPA's position outlined to the</p>

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			<ul style="list-style-type: none"> <li>Independent - meeting 11% of the educational needs of the State.</li> </ul> <p>The Catholic education sector is recognised as a prominent and necessary provider in the delivery of education to meet the educational need of Victorians now and into the future. The Catholic education sector is a not-for-profit education provider working in partnership with State government to provide primary and secondary education to our communities.</p> <p>The Catholic sector and the Independent sector are distinct from one another and operate across different catchments. While Catholic primary and secondary school catchments closely align with local parishes and traditional community preferences, the Independent sector traditionally enrolls students from a much wider catchment. Separate strategic justification for the Catholic sector and the Independent sector is required to determine their respective demand.</p> <p>Combining the Catholic and Independent sectors together is likely to result in the under provision of schools within the study area. It undermines strategic work undertaken by CEM and the commitments made to CEM to ensure that future planning will meet the demonstrated community demand for Catholic schools within the wider Bacchus Marsh area.</p> <p>Referring to Catholic education in the UGF increases the capacity of Moorabool Shire Council to effectively plan for schools...in response to population and demographic needs of the future Bacchus Marsh community.</p>	<p>Planning Panel considering the Sunbury South and Lancefield Road PSPs, however, this will not include providing specific direction around future providers of non-government schools within the PSP itself.</p>

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			<p>Below we strategically justify future demand for Catholic education within the wider Bacchus Marsh area and we recommend you include this information in the UGF to achieve greater clarity and accurately identify provision of future Catholic education to achieve optimal planning outcomes.</p> <p><u>Visions and Principles:</u></p> <p>CEM supports the key principle identified as the delivery of high level infrastructure. This includes:</p> <p>Plan for schools and community centres in response to population and demographic needs</p> <p>As outlined above, Catholic education meets 23% of the educational needs of the State. This provision includes both Catholic and non-Catholic children, with the participation rates of non- Catholics at 20% in some Catholic schools. Further to this, in the 2016 ABS Census, 28% of the population of Bacchus Marsh (SA2) identified as Catholic.</p> <p><u>Population-serving industries and residential growth precincts:</u></p> <p>Education is identified as a key population-serving industry within Bacchus Marsh. We note that:</p> <p><i>Education demand in new growth areas may provide opportunities to establish new education facilities.</i></p> <p>This statement is undoubtedly true and CEM has undertaken work to determine the likely scope of demand for Catholic education within the Merrimu,</p>	<p>See below.</p> <p>See below.</p>



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			<p>Parwan and Hopetoun Park North growth areas. Forecasts for Catholic education demand in these areas are presented below: [tabular data provided]</p> <p><u>Merrimu Residential Growth Precinct:</u></p> <p>Based on the above assumptions CEM forecast that by 2041 there will be approximately 565 additional Catholic primary school students and 480 additional Catholic secondary school students residing within the Merrimu Residential Growth precinct.</p> <p><u>Parwan Residential Growth &amp; Commercial Growth Precinct:</u></p> <p>Based on the above assumptions CEM forecast that by 2041 there will be approximately 230 additional Catholic primary school students and 190 additional Catholic secondary school students residing within the Parwan Residential Growth &amp; Commercial Growth Precinct.</p> <p><u>Hopetoun Park North Residential Growth Precinct:</u></p> <p>Based on the above assumptions CEM forecast that by 2041 there will be approximately 54 additional Catholic primary school students and 45 additional Catholic secondary school students residing within the Hopetoun Park North Residential Growth Precinct.</p> <p><u>Residential Growth Precincts Summary:</u></p> <p>Catholic education currently provide primary education at St Bernard's School, which alongside the soon to be opened primary school within the Stonehill Estate in the Maddingley area, will cater for the existing and forecast</p>	<p>Noted.</p> <p>Noted</p> <p>Noted.</p> <p>Noted.</p>

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			<p>demand for Catholic education within the established residential sections of the Bacchus Marsh District.</p> <p>Across the three new residential growth precincts earmarked for development in the Bacchus Marsh UGF; CEM forecast an additional:</p> <ul style="list-style-type: none"> <li>• 850 Catholic primary students</li> <li>• 715 Catholic secondary students</li> </ul> <p>To meet the increased demand for Catholic education from the three new residential growth precincts it is forecast that the provision of two additional Catholic primary schools will be required; establishing a total of four Catholic primary schools within the Bacchus Marsh Township.</p> <p>It is envisioned that one of these additional primary schools will be located within the Merrimu Residential Growth Precinct to cater for demand emanating from this area. The second primary school will likely be located within the Parwan Station Residential &amp; Commercial Growth Precinct to cater for demand emanating from this area and the Hopetoun Park North Residential Growth Precinct.</p> <p>The above forecasts suggest that there will be an additional 715 Catholic secondary students from the three new residential growth precincts earmarked for development in the Bacchus Marsh UGF.</p> <p>When considered alongside the anticipated growth in enrolments at St Bernard's Primary School, in addition to anticipated enrolments from P67 in the Stonehill Estate in Maddingley; these forecasts suggest there will</p>	

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			<p>be sufficient demand in the long term to justify the provision of a Catholic secondary school, likely to be located centrally within the Bacchus Marsh Township.</p> <p><u>Employment objectives:</u></p> <p>We note the following statement in reference to the employment objectives of the Bacchus Marsh UGF:</p> <p><i>Ensure education provision matches projected demand.</i></p> <p>Good planning outcomes require the optimal provision of all education sectors based on existing and future demand. The current Bacchus Marsh UGF does not identify the appropriate number of school sites or adequately make reference to the appropriate providers. To continue with the UGF in its present form is to compromise the capacity of Council to provide the full range of education provision the community expects and is entitled to receive.</p> <p>Catholic education should be clearly identified as a provider of primary and secondary education on the Bacchus Marsh area, with particular reference to the new residential growth precincts of Merrimu, Parwan and Hopetoun Park North.</p> <p>Adopting our recommendations provides greater clarity to the community without disadvantaging other educational providers and stakeholders and is necessary to deliver optimal planning outcomes which meet the needs of the community.</p> <p>It is good planning to consult with CEM in future iterations of the Bacchus Marsh UGF. This partnership</p>	<p>The VPA and MSC commend the CEM for having proactively undertaken such detailed strategic planning around identifying future Catholic education needs. This will provide valuable input into identifying future non-government education needs in the strategic outcome areas identified in the UGF, as part of the preparation of future PSPs.</p> <p>The VPA and MSC will look to engage with the CEM (as well as other education providers) as planning work for these future PSPs commences, to confirm the future school requirements in each precinct for both the government and non-government sector, and to discuss appropriate locations for such schools.</p>

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			approach provides greater direction to Council and the VPA on the likely plans for provision of additional Catholic education facilities within Bacchus Marsh.	
10	Property No. 382500, Flanagans Drive, Merrimu	Supports amendment	We continue to support the positive activity of the Council for the development of the Merrimu precinct in line with the Bacchus Marsh Urban Growth Framework and the VPA. We understand the Objectives and Vision of the Council and the VPA and look forward to being pro-active and supportive participants through the process.	No action required.

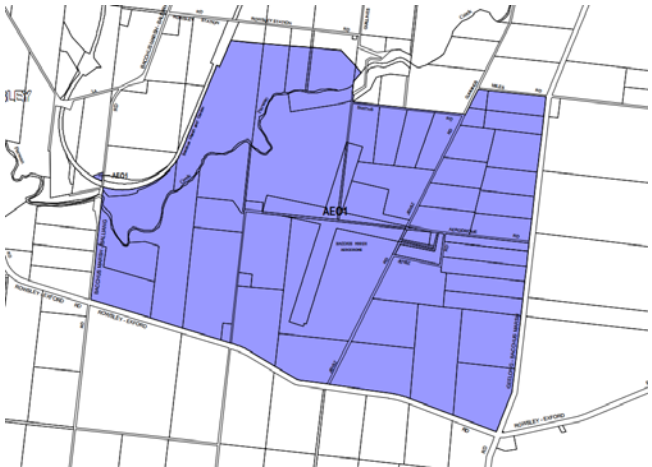
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11	2 Webb Court, Hopetoun Park	Comments only	<p>We are very concerned about the impact rezoning Hopetoun Park North will have on Hopetoun Park's character and accessibility. Hopetoun Park is classified as Residential Rural on our rates notices. Those that purchased land here did so for a more rural lifestyle. We were also of the understanding that there would be no shops, or other commercial development. We are of the opinion that building a medium or high density housing estate at Hopetoun Park North will change and spoil the rural character of the neighbourhood. Houses in Webb and Selby Courts will be most impacted by the planned development because we are on the south boundary. The land viewed from 2 Webb Court is hilly. Any houses built there will be overlooking our property destroying our view and privacy. Whilst the UGF cites the establishment of building envelope limits to manage gateway views there is no mention or recognition of the need to manage views of existing property owners.</p> <p>Since the Western Highway realignment, traffic from the Avenue of Honour has been redirected along Hopetoun Park Road to access the freeway. Heavy vehicles frequently travel along that road. It is a narrow one lane road. It is not appropriate to build more housing until this safety issue is addressed. Hopetoun Park road is the only road in and out of Hopetoun Park. There are concerns about evacuation should an emergency arise and all residents try to leave at the same time.</p> <p>There is no access to Bacchus Marsh and Ballarat other than through the Avenue of Honour. Housing development at Hopetoun Park North will increase congestion along the Avenue of Honour. Residents should be able to bypass Bacchus Marsh to travel to Ballarat.</p>	<p>The existing residential area at Hopetoun Park is within the Low Density Residential Zone (LDRZ). Any reference to 'Residential Rural' on rates notices is purely for rates purposes.</p> <p>The UGF indicates that the Hopetoun Park North precinct will be rezoned to LDRZ or Neighbourhood Residential Zone (NRZ). The ultimate zone boundaries and minimum lot sizes will be determined by via a future planning scheme amendment, which will include the application of zone schedules and a new Schedule to the DPO. A range of technical studies will be required to support and inform a future planning scheme amendment and development plan, such as biodiversity, bushfire risk, cultural and European heritage, integrated transport, infrastructure, etc.</p> <p>It is, however, recommended that the UGF be amended to state that:</p> <ul style="list-style-type: none"> <li>• The LDRZ will be applied to the periphery of the precinct, at the interface with the existing LDRZ and the surrounding rural landscape and freeway.</li> <li>• The NRZ will be applied to the inner core of the precinct, in order to support a small activity centre or community facilities (noting that any activity centre or community facilities will be subject to economic/feasibility assessments during the PSP process).</li> </ul> <p>The UGF includes the following environment objectives (amongst others):</p> <ul style="list-style-type: none"> <li>• "Protect and enhance natural assets and landscape features such as the Long Forest Nature Conservation Reserve, waterways and escarpments."</li> </ul> <p>The UGF also includes the following precinct planning principles (amongst others):</p>

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			<p>Higher density housing and commercial premises may also bring increased crime, rubbish (already an issue along Hopetoun Park Road) and increased “hooning” (also an issue.) Current residents in Hopetoun Park moved away from the suburbs to escape this. Despite the additional Council rates that new houses in Hopetoun Park North would bring, we have concerns that the Shire will not have the resources to maintain the new estate.</p> <p>The southern end of Hopetoun Park Road has not been maintained to an acceptable standard for many years. The road is lumpy and potholed, the land either side is not mown and tidy very often, litter is not removed and there has been no beautification to the roundabout. The unattractive Hopetoun Park sign is still up.</p> <p>We are also concerned about the environmental impact of higher density housing at Hopetoun Park North. The west escarpment is a feeding ground for wedge- tailed eagles. Although not endangered in Victoria exact numbers are unknown. They are protected under the <i>Wildlife Act 1975</i>. Eagles do not breed prolifically. They usually rear only one fledgling a year and not always successfully. New housing estates reduce feeding grounds and the noise and activity of building housing will drive them away. Rabbits, a known pest, can make up to 90% of a wedge-tailed eagle’s diet and they abound in plenty on the escarpment.</p>	<ul style="list-style-type: none"> <li>• “Identify and define the existing character of Hopetoun Park and establish principles for a preferred character.</li> <li>• Provide a perimeter road along the top edge of the escarpment with pedestrian and cycling trails on the outer edge of the road cross-section.</li> <li>• Establish building envelope limits to manage gateway views when arriving in Bacchus Marsh.</li> <li>• Establish building envelope limits to manage views from the Western Freeway and Avenue of Honour.”</li> </ul> <p>It is recommended that the following principle be added:</p> <ul style="list-style-type: none"> <li>• <u>Ensure that development is set back from the top of the escarpment, to minimise landscape and environmental impacts.</u></li> </ul> <p>These principles, together with the above recommendation for LDRZ around the periphery of the precinct, will ensure that landscape and environmental impacts are minimised.</p> <p>Transport is one of the key elements of the UGF. The UGF includes the following transport objectives:</p> <ul style="list-style-type: none"> <li>• “Provide a connected and efficient arterial road network.</li> <li>• Maintain the Western Freeway as the key east-west link across Bacchus Marsh and as a scenic route to the Central Highland Region gateway.</li> <li>• Provide a second north-south arterial road (i.e. the ELR).</li> <li>• Improve the accessibility and capacity of the train service.</li> <li>• Improve and expand bus coverage to key existing and future destinations.</li> <li>• Facilitate walking and cycling as viable transport modes.</li> <li>• Review optimal management and investment opportunities at the Bacchus Marsh Aerodrome.</li> <li>• Strengthen the potential for road networks to manage local traffic movement.”</li> </ul>

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			<p><u>Conclusion:</u></p> <p>We are concerned about the impact rezoning Hopetoun Park North will have on Hopetoun Park, its environment and the residents. Our location affords us peri urban living. We do not want urban living on our doorstep.</p> <ul style="list-style-type: none"> <li>• We are concerned about preserving our rural character.</li> <li>• We are concerned that the visible impact of housing development and loss of privacy which will affect some Hopetoun Park property owners. Increased noise and traffic along Hopetoun Park road will affect all current residents and their ease of accessibility to Hopetoun Park.</li> <li>• We are concerned about increased traffic congestion, road safety, increased litter, crime and hooning that additional housing and commercial development may encourage.</li> <li>• We are concerned that Council may not have the resources to maintain the new developments and provide the infrastructure (road access) required.</li> <li>• We are concerned about the impact on wild life that frequent and live on the west side escarpment.</li> <li>• We recommend that Council adopt an infrastructure first approach to town planning and address the current and anticipated issues around traffic management before undertaking any residential development.</li> <li>• We recommend that Hopetoun Park North is rezoned LDZR with blocks no less than 1 acre and with farm fencing in order to preserve the character of Hopetoun Park and minimize the impact of increased road traffic.</li> </ul>	<p>The exhibited MSS Clause 21.05-3 lists a number of objectives and strategies which will ensure the delivery of 'integrated transport' within and beyond the new growth precincts. Clause 21.05-4 includes an objective "<i>to provide appropriate levels of community facilities and infrastructure ....</i>". It includes a strategy to "<i>require new development to make financial contributions to the provision of community facilities and infrastructure, such as roads, bicycle paths, footpaths, public transport, ....., via development contribution plans or infrastructure contribution plans</i>".</p> <p>As per the response to submission 4, the UGF includes a precinct planning principle relating to improved road connectivity for Hopetoun Park North. It is recommended that this principle be amended as follows:</p> <p><i>Consider opportunities to improve road connectivity <del>ons in and out of the precinct, onto</del> with the Western Freeway to and from the west, and as well as Hopetoun Park junction with the Old Western Highway from Hopetoun Park Road.</i></p>

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			<ul style="list-style-type: none"> <li data-bbox="701 331 1368 512">• We recommend that housing is not built below the fire track on the hilly west escarpment directly above the orchards in the valley, to preserve views for existing Hopetoun Park residents on the South boundary and as a buffer zone between the housing, wildlife and the orchardists below.</li> </ul> <p data-bbox="701 544 1368 695">We invite council to visit us at 2 Webb Court Hopetoun Park to discuss further the issues raised and to view our property to discuss the anticipated impact that development will have on us and other Hopetoun Park residents.</p>	



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12	34 Glenmore Road	Comments only	<p>Bacchus Marsh Aerodrome probably hinders development of PEP. It is too small to provide any significant benefit while it creates a detrimental effect due to possible restrictions.</p> <p>The airport should either fully develop to complement growth of the area or relocate to a different site in the next 2-3 decades.</p>	<p>Bacchus Marsh Aerodrome (BMA) can and does have impacts on the PEP due to existing overlays. The Airport Environs Overlay is one such existing overlay – bringing automatic referral to key stakeholders so as to protect the Aerodrome.</p>  <p><b>Figure 5: Airport Environs Overlay</b></p> <p>As per the response CASA submission (8), it is recommended that the UGF and exhibited MSS Clause 21.04-7 be amended to include a future action to apply the Design and Development Overlay to the obstacle limitation surface protection area applicable to the environs of BMA.</p> <p>Council is closely working with the new board of BMA committee of management to finalise an agreed management structure, ownership and responsibilities. The clear goal is to see the aerodrome become a regional level, well-funded facility generating a range of services from flight training to potentially emergency services, charter flights and recreational usage. Council is currently developing a masterplan to guide the future</p>

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				development of the BMA. This action is listed in Table 4 (Key growth actions-local) of the UGF.
13	N/A Grampians Central West Waste Recovery & Recycling Group (GCWWRRG)	Comments only	<p>GCWWRRG submission focuses on the impact of the Framework and Amendment C81 on the Maddingley Brown Coal Waste and Resource Recovery Hub of State Importance (Maddingley Hub). The Maddingley Hub includes a scheduled landfill, resource recovery, soil blending and organic composting operations. Our submission raises the importance of planning controls acknowledging the Maddingley Hub and its associated buffers to ensure protection for the Hub and protection for proposed adjoining residential development from adverse amenity impacts from activities within the Hub.</p> <p>These comments follow on from our discussion on 28 November 2017 with Victorian Planning Authority (VPA), Metropolitan Waste and Resource Recovery Group (MWRRG) and Sustainability Victoria (SV) and Moorabool Shire Council.</p> <p><u>Statewide Waste and Resource Recovery Infrastructure Plan 2015:</u></p> <p>The Statewide Waste and Resource Recovery Infrastructure Plan (Statewide Plan), together with the Metropolitan Implementation Plan and the six Regional Implementation Plans forms the Victorian Waste and Resource Recovery Infrastructure Planning Framework (Framework). This framework enables Victoria to establish a waste and resource recovery system that is integrated, supports resource recovery and plans for effective management of waste. The Metropolitan Waste and Resource Recovery Implementation Plan 2016 (Metropolitan Implementation Plan) and the</p>	<p>This submission is very similar to submission 7 from Sustainability Victoria (SV).</p> <p>Noted. As per the response to submission 7 (SV), the UGF acknowledges that the Maddingley Waste and Resource Recovery (WRR) Hub is a State significant facility. It is, however, recommended that the significance of the WRR be further emphasised where appropriate; e.g. on UGF Plan 1, and in MSS Clause 21.04 as per the response to submission 7.</p> <p>Noted.</p> <p>Noted.</p>



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			<p>reprocessing end of life cars and white goods across the state. The site also providing materials recovery, composting and soil blending opportunities for coal and organic waste from metropolitan Melbourne.</p> <p><u>Grampians Central West Waste and Resource Recovery Implementation Plan 2016:</u></p> <p>The Grampians Implementation Plan sets out how the waste and resource recovery infrastructure needs of the region will be met over the next 10 years.</p> <p>The Maddingley Brown Coal site is scheduled in the Grampians Implementation Plan. The Grampians Implementation Plan has a ministerial approved landfill schedule that schedules the Maddingley Brown Coal landfill site as a long term solid inert landfill to 2042. This landfill provides a critical service to the metropolitan area as highlighted previously; it also has an important role in servicing the Grampians Central West region.</p> <p>Maddingley Brown Coal will continue to play a pivotal role in landfill provision for the foreseeable future because it is the only landfill licensed to accept metal recycling shredder residue, it is strategically located, has long term airspace capacity and potential for future uses including increased organics processing. It also provides a significant source of regional employment and economic development.</p> <p><u>Amendment C81 Provisions and the need for buffer protection:</u></p>	<p>Noted.</p> <p>Noted.</p> <p>Noted. Refer to response to submission 7.</p> <p>See response to submission 7. The intent is that no new sensitive uses will be allowed within buffer interface areas, or within the Maddingley Employment Investigation Area (except for the possible future expansion of existing sensitive uses,</p>

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			<p>The current drafting of the amendment and its associated plans and controls could be strengthened in relation to the articulation and visibility of the Maddingley Hub and its buffers. This is to ensure controls over potentially sensitive uses and development of land within the adjoining employment precincts and residential Parwan Precinct appropriately acknowledge the risks and potential impacts of the Hub on future land uses.</p> <p>As discussed at our meeting of the 29 November 2017 GCWWRRG sees benefit in making minor amendments to the framework Plan and Amendment C81 to:</p> <ul style="list-style-type: none"> <li>• clearly label and articulate in the Framework the Maddingley Brown Coal site and its landfill, recovery and composting operations.</li> <li>• clearly articulate and label in the Framework all of the Maddingley Brown Coal sites buffers including the landfill, resource recovery, organics composting and quarry buffers.</li> <li>• clearly articulate that residential and sensitive land uses are not being proposed for land within established landfill and amenity buffers. Buffer land within the Parwan Precinct on Plan 1: Urban Growth Framework, should be amended to clearly articulate that residential land uses are not proposed.</li> <li>• identify the Maddingley Brown Coal Precinct on the Framework Plan 1 and consider including it in an Investigation Area to provide a framework for future</li> </ul>	<p>subject to demonstrating how amenity impacts will be mitigated).</p> <p>Agreed. It is recommended that the UGF (e.g. Plans 1, 4, 5, 7 and 8 be amended accordingly.</p> <p>As per the response to submission 7, it is recommended that the UGF (particularly Plan 4) be amended to show only one sensitive use buffer for the Maddingley WRR Hub, which measures 2.0 km from the current composting operations approved under EPA licence 45288 (as amended on 22/11/2017). There is no need to show buffer requirements for other uses at this site, such as coal mining and landfill, as these are contained within the 2.0 km buffer. (see also comments below and response to submissions 13 and 21).</p> <p>Agreed. It is recommended that the UGF (including relevant plans) and the exhibited MSS Clause 21.07 be amended, to make it clear that sensitive uses are not permitted within the buffer interface areas or within the Maddingley Employment Investigation Area (except for the possible future expansion of existing sensitive uses, subject to demonstrating how amenity impacts will be mitigated).</p> <p>Agreed. As per the response to submission 7, it is recommended that the UGF (e.g. Tables 1 and 3 – Key growth actions – state/regional) and exhibited MSS clauses be</p>

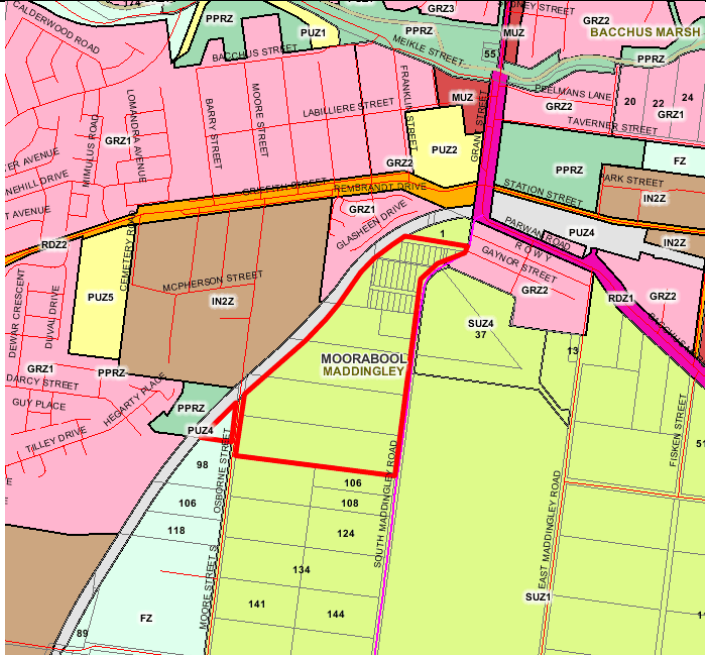
Submission Number	Affected Property/ Agency	Submitter's Position	Submission Summary	Council Officer Recommendations/Comments (N.B. Underlining indicates added text. Strikethrough indicates deleted text.)
			<p>discussions on appropriate planning controls for the Hub and its buffers during the precinct structure planning phase.</p> <p>The labelling of the Hub, its activities and specific labelling of the range of buffers will provide greater clarity for future users of the Framework and planning scheme controls. GCWWRRG defers to EPA the identification of appropriate buffer distances that should apply to the range of land uses proposed for the sites impacted by this amendment.</p> <p>GCWWRRG advises that appropriate buffer areas are essential for protecting the long term operation of landfill and resource recovery facilities from encroachment of incompatible uses, and minimising harm on surrounding communities. It is recommended that Council detail additional strategies in the Framework Plan. This could include strategies to define the buffer through a planning scheme tool and strategies to ensure that development within buffers must analyse and assess the environmental risks and require a design response including mitigation measures that clearly show how development in buffer areas will not be impacted.</p>	<p>amended to include an action for a planning study to be undertaken (in the short term) for the Maddingley WRR Hub site and associated amenity buffer area, to determine appropriate planning zone and overlay controls (e.g. ESO, DDO). The planning study should also consider options for improved practices at the Maddingley WRR Hub, to reduce amenity buffer impacts on existing sensitive uses. All key stakeholders need to be engaged in this process, including (but not limited to) Maddingley Brown Coal, the EPA, SV, Grampians Central West Waste and Resource Recovery Group (GCWWRRG), Metropolitan Waste and Resource Recovery Group (MWRRG), DEDJTR, VPA and landowners.</p> <p>Noted. Refer to comments above and the response to submission 7.</p> <p>Noted. As per above comments and the response to submission 7, this matter should be considered as part of a future planning study to be undertaken (in the short term) for the Maddingley WRR Hub site and associated amenity buffer area.</p>

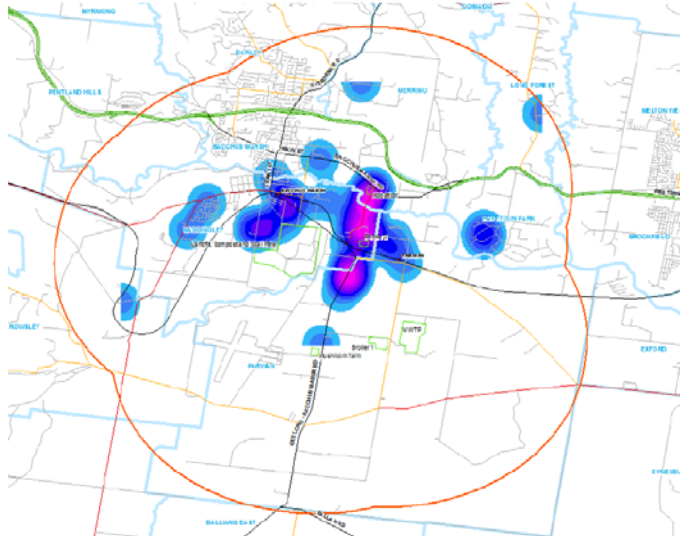
Submission Number	Affected Property/ Agency	Submitter's Position	Submission Summary	Council Officer Recommendations/Comments (N.B. Underlining indicates added text. Strikethrough indicates deleted text.)
			<p>There are a range of planning tools that can be used to plan and manage the use and development of the Hub and landfill site and sensitive uses in the buffers. These tools are applicable to this site and any other waste and resource recovery site that has sensitive uses in its buffers. The tools include an Environmental Significance Overlay (ESO) or Development Plan Overlay (DPO). The Framework Plan would benefit from a specific strategy to explore the application of appropriate buffer protection tools during the Precinct Structure Planning Phase.</p> <p>GCWWRRG maintains that whatever planning tool Council seeks to use it should allow adjoining communities to clearly and transparently identify the proposed landfill site and the range of buffers that are in existence now and will apply during the operation and post closure periods of the landfill. The planning tool should also require an assessment, where appropriate, of the impacts and risks to the community and environment from the potential development of sensitive uses within and adjoining buffer areas.</p> <p>GCWWRRG strongly support Council's forward planning approach for the Bacchus Marsh District and the consideration of impacts from the landfill and resource recovery operations on the use and development of proposed residential area within the Bacchus Marsh District.</p>	<p>Noted. Refer to comments above and the response to submission 7.</p> <p>Noted. Refer to comments above and the response to submission 7.</p> <p>Noted.</p>
14	Property No. 533150, South Maddingley Road, Maddingley	Comments only	Our client is the owner of vacant land (about 28 hectares in area; Figure 6) generally located to the east of South Maddingley Road, adjacent to the Bacchus Marsh Grammar campus.	<p>The subject property is highlighted in Figure 6 below.</p> <p>The land is not presently in an urban zone; it is within the Special Use Zone Schedule 1 (Coal Mining). The land has been the subject of protracted debate in previous Planning Panels about</p>

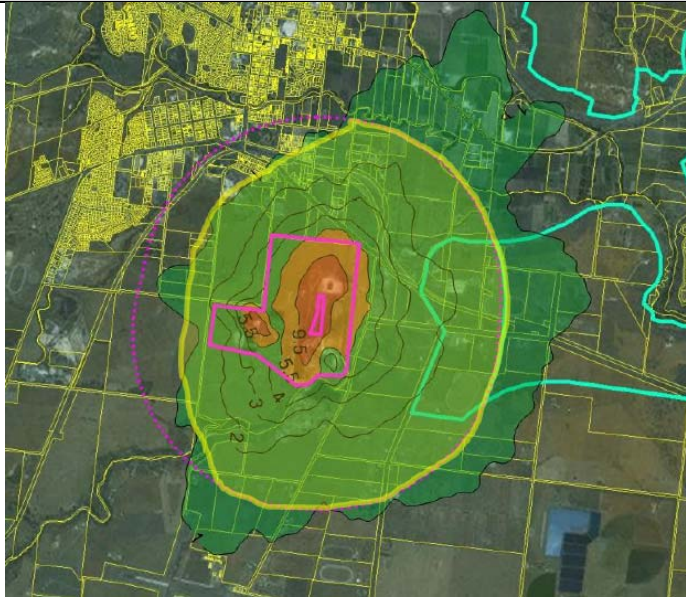
Submission Number	Affected Property/ Agency	Submitter's Position	Submission Summary	Council Officer Recommendations/Comments (N.B. Underlining indicates added text. Strikethrough indicates deleted text.)
			<p>There is a clear case for further urban residential land in South Maddingley, building on existing infrastructure, particularly including:</p> <ul style="list-style-type: none"> <li>• The regional rail service (500 Metres);</li> <li>• Education facilities at Bacchus Marsh Grammar (opposite) and Bacchus Marsh College (500 metres);</li> <li>• Recreation facilities including Maddingley Park (600 metres);</li> <li>• The commercial facilities and services in the Grant Street spine which links to the central activity centre (including neighbourhood commercial facilities adjacent to Maddingley Park).</li> </ul> <p>Our client's submission is:</p> <ul style="list-style-type: none"> <li>• This land should be included within the existing urban area, and not the Maddingley Employment Investigation Area in the Urban Growth Framework Plan. It constitutes a significant infill opportunity supported by existing infrastructure and services;</li> <li>• The sensitive use buffer recommendations (Plan 4 Physical Constraints) which underpin the land use framework are flawed and should be reviewed. There is no reasonable application of buffer distances that would preclude the designation of this land as an infill residential area;</li> <li>• The designation of this land as urban residential would be consistent with the exhibited policies within the amendment, it is not productive farming land, it is not a sensitive landscape, there is no shortage of employment land proposed to be designated, it is well located in relation to key services and infrastructure, and provides a short term residential supply option for affordable land</li> </ul>	<p>zoning and the current planning scheme (Clause 21.07-9) requires a buffer study to be undertaken.</p> <p>The Planning Panel for Amendment C34 (MSS review; 2008) concluded the following in relation to this land:  <i>"The enforcement of standard buffers for coal mining, refuse disposal, composting and some industrial uses impose a major constraint on the development of sensitive uses in south western Bacchus Marsh."</i></p> <p>.....  <i>"The proximity of the northern parts of the SUZ1 to the town centre is an important locational advantage that supports investigation of development for a range of urban purposes. This locality has an important strategic focus on employment generation and involves uses with off-site impacts. A range of non-residential uses may well be appropriate in this locality but are not facilitated by existing SUZ1 provisions."</i></p> <p>In 2017, Council commissioned Pacific Environment to undertake a buffer study. This resulted in a report titled <i>Bacchus Marsh UGF - Bacchus Marsh Buffer Assessment</i> (22 August 2017). The buffer assessment indicates the following:</p> <ul style="list-style-type: none"> <li>• A number of odour complaints around the subject land (Figure 7);</li> <li>• The recommended separation (i.e. buffer) distance around the Maddingley WRR Hub (see Figure 8) would not allow new sensitive uses to be established as proposed by this submission.</li> </ul> <p>The recommended separation (i.e. buffer) distance is based on odour dispersion modelling which has been verified by field odour observations.</p>



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			<p>pending development of the longer term areas identified;</p> <ul style="list-style-type: none"> <li>The designation of this land as urban residential would not create additional constraints on existing industrial land as these areas already have residential development within comparable setback distances.</li> </ul> <p>We understand that a buffer assessment was undertaken and underpins the some of the designation of the Maddingley Employment Investigation Area.</p> <p>We request that the information is made available to allow an informed response to the amendment during future consideration of it.</p>	<p>There is no evidence as to why Council should vary the buffers below EPA requirements for new greenfield development.</p> <p>The Maddingley WRR Hub is of State significance and its long term viability is dependent upon the exclusion of new sensitive uses from the recommended amenity buffer areas. This is especially true where new greenfield residential development is proposed; i.e. when it could be delivered elsewhere.</p> <p>Whilst the land cannot be zoned for residential or sensitive uses it is yet to be determined what the highest and best future use might be. As per the response to submissions 7 and 13, it is recommended that a planning study be undertaken (in the short term) for the Maddingley WRR Hub site and associated amenity buffer area, to determine appropriate planning zone and overlay controls.</p> <p>A copy of the <i>Bacchus Marsh Buffer Assessment</i> has been provided to the submitter.</p>

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				 <p>The zoning map shows various residential zones including PPRZ, GRZ1, GRZ2, GRZ3, MUZ, PUZ1, PUZ2, PUZ3, PUZ4, PUZ5, INZZ, RDZ1, RDZ2, SUZ1, SUZ4, SUZ37, FZ, and MZ. The subject land is outlined in red and is located in the Moorabool Maddingley area, bounded by South Maddingley Road to the east and the intersection of Moorabool Road and the unnamed road to the south. Other nearby streets include Calderwood Road, Bacchus Street, Moore Street, Labilliere Street, Finlay Street, Mowle Street, Pelmans Lane, Tavernier Street, Station Street, Park Street, Gaynor Street, Curran Street, Dewar Crescent, Dunal Drive, Darcy Street, Guy Place, Talley Drive, Hearty Place, and Moorabool Road.</p> <p><b>Figure 6:</b> Zoning map showing the subject land delineated in red.</p>

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				 <p data-bbox="1388 874 2094 909"><b>Figure 7:</b> Odour complaints (source: Pacific Environment)</p>

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				 <p data-bbox="1391 922 2141 1043"><b>Figure 8:</b> Odour dispersion modelling results Maddingley composting operations (current operations) (with the recommended separation distance in shaded yellow) (source: Pacific Environment).</p>
15	N/A Metropolitan Waste Recovery & Recycling Group (MWRRG)	Comments only	This submission essentially notes the same matters as submission 13.	As per the response to submissions 7 and 13, it is recommended that a range of amendments should be made to the UGF and exhibited MSS clauses. These matters have been discussed and workshopped with MWRRG, GCWWRRG, EPA and SV.

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16	N/A V/Line	Comments only	<p><u>Community and Social Infrastructure:</u></p> <p>Community and social infrastructure such as schools, parks and activity centres should not be constructed near existing rail lines. This poses a significant risk and should be avoided as a matter of priority.</p> <p><u>Upgrade of Level Crossings:</u></p> <p>The rezoning, increase in housing and industrial areas changes current risk parameters. Accordingly, crossings may need to be re-assessed and upgraded; e.g. inactive crossings may need to be upgraded to active crossings, for which V/Line may seek funding from Council or developers.</p> <p><u>Shared Pathway Crossings:</u></p> <p>In the event that shared pathways will cross existing or pedestrian level crossings, crossings may need to be upgraded to active crossings, moved or closed depending on the circumstances. This could also result in the closure of some roads for safety. V/Line may look to Council for approval of any road closures, and funding by Council or developers of any upgrades, closures or movement of crossings.</p> <p><u>Pedestrian Crossings:</u></p> <p>Pedestrian crossings should not be constructed as stand-alone crossings; rather, pedestrians should be directed to road crossings or existing pedestrian crossings at level crossings which have been constructed with relevant safety standards in mind.</p>	<p>This submission raises a range of operational and design matters which cannot be reasonably addressed in the UGF.</p> <p>The UGF does not define specific locations for these land uses, as these will be subject to further master-planning through the preparation of a PSP.</p> <p>Given the planned provision of a train station at Parwan, there will be a strong objective to co-locate with a range of community and commercial infrastructure. V-Line will need to be actively engaged in discussions around the siting of this infrastructure as part of the preparation of a future PSP to manage this risk.</p> <p>It is, however, recommended that the UGF should be amended, to include the following additional precinct planning principles for Parwan Station precinct (page 79) to reflect on some of the issues raised:</p> <ul style="list-style-type: none"> <li>• <u>Locate activity centres based on walkable catchments, with the main activity centre located in close proximity to the future railway station, in consultation with TfV and V/Line.</u></li> <li>• <u>Identify appropriate locations for railway crossings, to cater for efficient movement of vehicles, cyclists and pedestrians, in consultation with Transport for Victoria and V/Line.</u></li> </ul> <p>Consideration will need to be given to cost recovery for new or upgraded infrastructure, via future DCPs/ICPs for the growth precincts.</p>

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			<p><u>Vegetation:</u></p> <p>The type, extent and placement of vegetation should not affect train drivers' signalling vision and vision of level crossings. Further, debris from vegetation could potential affect the railway infrastructure which can cause signalling interruptions and other safety concerns.</p> <p><u>Lighting:</u></p> <p>Lighting should not be installed in locations which can affect train drivers' vision in general or interfere with signalling and level crossing vision.</p> <p><u>Drainage:</u></p> <p>Council should ensure that installation of drainage directs water flow away from the rail reserve and does not inadvertently affect any rail infrastructure.</p> <p><u>Fencing:</u></p> <p>Upgrades to the amount and type of fencing may be required as a result of the rezoning and development, and subsequent change to risk parameters. V/Line may also look to Council or developers for funding of these upgrades.</p> <p>V/Line considers that the above submissions require further discussions and therefore requests a panel hearing to discuss these and other submissions in detail.</p>	
17	N/A EPA	Comments only	We refer to our previous correspondence dated 8 August 2017, which relayed concerns in relation to the establishment of residential uses to the south and west	Concern noted. As per the response to submissions 7 and 13, it is acknowledged that the UGF Plans 1, 3, 4, 5, 6, 7 and 8 are ambiguous with respect to buffers. The intention is that no

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			<p>of the proposed Parwan Station, given the proximity to the nearby broiler farms, composting facility and waste water treatment plant.</p> <p>The buffer zones of these industries are shown on the map below, which is an extract from Plan 4 – <i>Physical Constraints</i> of the Framework Plan.</p> <p>We now reiterate our previous advice that due to the cumulative impact of the cluster of activities to the west and south of the Parwan Station, residential use of land within the buffer zones of several industries creates encroachment upon industry.</p> <p>This means that these areas are not suitable for residential development as they are sited too close to existing industry and there is a high likelihood that future residents will often be affected by odour, which will also threaten the viability of existing and future industries.</p> <p>We also now reiterate our previous advice that the northern edge of the future employment growth precinct, should prohibit new intensive agricultural or industrial uses which will have adverse amenity or health impacts on the residential growth that is proposed to surround Parwan Station.</p> <p>I refer to the meeting at Moorabool Shire on 8 August 2017, where it was agreed that the land within the buffers of existing industries to the south and west of Parwan Station should be managed via zoning and overlay schedules that prohibit both sensitive and polluting uses.</p>	<p>sensitive uses will be allowed within buffer interface areas. Intensive agricultural uses and polluting industrial uses should also be prohibited within buffer interface areas. Only appropriate uses without potential for adverse amenity impacts (i.e. uses not listed under VPP Clause 52.10) should be allowed to establish within these areas.</p> <p>It is recommended that the UGF (including the above plans) and the exhibited MSS clauses be amended, to clarify the intent that no new sensitive uses are permitted within the buffer interface areas and within the Maddingley Employment Investigation Area (except for the possible future expansion of existing sensitive uses, subject to demonstrating how amenity impacts will be mitigated).</p> <p>See above.</p> <p>Agreed. See above.</p> <p>Noted.</p>

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			<p>The land within the buffer zones of these industries where new residential uses and new intensive agricultural or industrial uses are contemplated are shown on UGF Plan 1 – <i>Urban Growth Framework of the Framework Plan</i>.</p> <p>It is important to note that this matter is discussed in further detail within the follow up correspondence from Andrew Goodsell dated 9 August 2017, which is now attached. This correspondence discusses alternative uses for these areas, such as bulky goods retailing, garden supplies depots and horse breeding. These uses are neither sensitive nor polluting land uses.</p> <p>EPA are concerned that the framework plan is not consistent with these agreed outcomes as it continues to promote residential development within buffer zones and intensive agricultural or industrial uses close to proposed residential areas “subject to further investigation”.</p> <p>This does not provide clear land use guidance and is inconsistent with the following objectives of the framework:</p> <ul style="list-style-type: none"> <li>• <i>Guide new development towards areas capable of change, and away from constraints</i></li> <li>• Provide certainty to the community and development industry</li> <li>• <i>To address future residential and economic needs, a clear growth framework needs to be established, built upon clear strategic directions and principles.</i></li> </ul> <p>Given this, more specific direction should be provided for the southern and western areas of the Parwan</p>	<p>These concerns will be addressed via the above recommended changes.</p> <p>Noted. See above.</p> <p>The PSP process for Parwan Station and Parwan Employment Growth precincts will involve the preparation of a schedule of allowable and prohibited uses. It is, however, recommended that the precinct planning principles for Parwan Station precinct in the UGF be amended as follows:</p> <p><del>Along the western and southern edges of existing use</del> <u>Amenity buffers interface areas:</u></p> <ul style="list-style-type: none"> <li>• <u>Apply a different zone control to these areas (i.e. different to the balance of the precinct), to ensure that sensitive uses, intensive agricultural uses and uses with adverse amenity potential (as listed under VPP Clause 52.10) are prohibited.</u></li> <li>• Consider opportunities for commercial land uses (<del>not sensitive uses</del>) which support either the employment precinct of the residential precinct. Any such uses must not generate a need for buffers from sensitive uses.</li> </ul> <p>It is recommended that the precinct planning principles for Parwan Employment growth precinct in the UGF be amended as follows:</p>



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			<p>Station precinct (i.e. the shaded areas within the map on the previous page) to:</p> <ul style="list-style-type: none"> <li>Prohibit residential development in the western and southern areas of the “future residential / commercial growth precinct”;</li> <li>Prohibit intensive agricultural or industrial uses in the northern areas of the “future employment growth precinct”; and</li> <li>Outline alternative uses for these areas as per the direction contained within the letter to EPA from Council dated 9 August 2017.</li> </ul> <p>Whilst it is acknowledged that this matter will be addressed within more detail in a future Precinct Structure Plan for Parwan Station, it is nonetheless of critical importance that clearer land use direction is provided within the early stages of the strategic planning process.</p> <p>EPA submission to C79:</p> <p><b>Background</b> EPA currently plays a significant role in responding to impacts arising from industrial activities, landfills or intensive agriculture where these are located in close proximity to other land uses.</p> <p>Population growth in regional population centres and expanding townships is increasingly resulting in residential development closer to existing industrial and</p>	<p>Add the following precinct planning principle:</p> <ul style="list-style-type: none"> <li><u>Apply a different zone control to the buffer interface areas (i.e. different to the balance of the PEP), to ensure that new land uses do not generate a need for an amenity buffer to sensitive uses.</u></li> </ul> <p>It is recommended that UGF Tables 1 and 3 be amended to include a requirement for a planning study in the short term of the Maddingley WRR Hub site and surrounds (including amenity buffer area) to determine appropriate planning zone and overlay controls.</p> <p>It is also recommended that exhibited MSS Clause 21.04-4 be amended as follows:</p> <ul style="list-style-type: none"> <li>Avoid sensitive uses within recommended separation distances from <u>existing industrial uses, such as the Maddingley Waste and Resource Recovery Hub <del>Brown Coal Mine</del> and, the Darley/Coimadai sand quarries and the Bacchus Marsh Recycled Water Plant.</u></li> <li><u>Avoid incompatible land use conflicts by preparing a land use amenity plan for the Parwan Employment Precinct, to ensure that future land uses with the precinct are adequately separated from sensitive uses.</u></li> </ul> <p>Noted.</p> <p>Noted.</p>

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			<p>agricultural activities, creating problems for residents and businesses and often requiring regulatory interventions from the EPA and other authorities.</p> <p>EPA wishes to emphasise the importance of consideration of encroachment issues through the MSS rewrite. <i>EPA Publication 1518, Recommended Separation Distances for Industrial Residual Air Emissions</i> (March 2013) provides guidance in relation to this.</p> <p><b>Recommendations</b> EPA wish to comment on the amended Municipal Strategic Statement and in particular, Clause 21.07- Bacchus Marsh.</p> <p>We note that the Key Issues and Influences at Clause 21.07-1 provide the following summary of the land use constraints at the south of the township:</p> <p><i>There are a number of strategically important land uses to the south of Bacchus Marsh, such as the Maddingley Brown Coal operations (coal mining, landfill and green waste composting), agribusiness, the airport and the Parwan Waste Water Treatment Plant. Such uses are inherently incompatible with residential development due to their off-site impacts.</i></p> <p>It is however noted that these land use constraints are not reflected within the objectives regarding Managing Urban Growth at Clause 21.07-2.</p> <p>EPA is of the view that Clause 21.07-2 should include objectives which discourage residential encroachment on industry, to provide further planning direction to</p>	<p>Noted.</p> <p>It is recommended that the exhibited MSS clauses be amended as follows:</p> <p>Clause 21.07:</p> <ul style="list-style-type: none"> <li>Amend the Bacchus Marsh Urban Growth Framework Plan to clarify that sensitive uses are prohibited within buffer interface areas.</li> </ul>

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			<p>protect the industrial and agricultural land uses outlined above.</p> <p>Additional objectives could include:</p> <ul style="list-style-type: none"> <li>• <i>Direct residential development away from the buffer zones of the industrial and agricultural land uses to the south of Bacchus Marsh, such as the Maddingley Brown Coal operations (coal mining, landfill and green waste composting), broiler farms and the Parwan Waste Water Treatment Plant;</i></li> <li>• <i>Maintain industry buffer distances as contained within EPA Publication 1518 Recommended separation distances for industrial residual air emissions (March 2013); and</i></li> <li>• <i>Seek the views of the Environment Protection Authority in relation to rezoning, subdivision or residential development proposals within the industry buffer distances as contained within EPA Publication 1518 Recommended separation distances for industrial residual air emissions (March 2013).</i></li> </ul>	<p>Amend the strategies under Clause 21.04-4 as follows:</p> <ul style="list-style-type: none"> <li>• Avoid sensitive uses within recommended separation distances from <u>existing industrial uses, such as the Maddingley Waste and Resource Recovery Hub <del>Brown Coal Mine</del> and, the Darley/Coimadai sand quarries and the Bacchus Marsh Recycled Water Plant.</u></li> <li>• <u>Avoid incompatible land use conflicts by preparing a land use amenity plan for the Parwan Employment Precinct, to ensure that future land uses within the precinct are adequately separated from sensitive uses.</u></li> </ul> <p>This matter will be addressed under the above recommended changes to Clause 21.04-4. It is not appropriate to duplicate this matter in Clause 21.07.</p> <p>Not supported, as this is already covered in the SPPF under Clause 13.04-2.</p> <p>Not supported, as referral requirements cannot be included in the MSS. Council would always seek comments from the EPA in relation to a planning scheme amendment.</p>

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18	N/A DET	Comments only	<p>The Department of Education and Training (DET) recognises that the Urban Growth Framework and Housing Strategy will provide high-level strategic direction to provide for expected residential growth in Bacchus Marsh. Such growth will likely impact on demand for infrastructure, including for government schools. DET expects to provide more detailed advice of its requirements for government schools as part of future precinct structure planning processes.</p> <p>If planned for correctly and with appropriate densities, this residential growth could potentially support the provision of additional education (and community) facilities. DET aims to ensure that all new communities, including Bacchus Marsh, have access to a government primary school within reasonable walking distance. However, this may not be possible if lower density development results in there being insufficient demand in a particular area. For example, the dwelling yield in Hopetoun Park North when combined with demand from the neighbouring Hopetoun Park settlement, would need to be sufficient to make providing a government primary school viable before DET would seek to identify a site for a proposed government school in this area.</p> <p>Developing a new school involves a number of stages to ensure that investment occurs in the right place at the right time. If sites for proposed government schools are identified in Bacchus Marsh as part of a future precinct structure planning process, DET will continue to review historic and forecast demographic data and actual school enrolments to identify expected government school shortfalls, and use this information to advise Government when and where schools need to be delivered to meet growing demand.</p>	<p>Noted. Council and the VPA will continue to engage with DET throughout the UGF and PSP processes regarding school needs within the investigation areas. It is Council's position that historic and forecast demographic data and school enrolment data already suggests need for a new primary school within the existing urban areas of Bacchus Marsh and Maddingley. Council will continue to work with DET to determine the best site and the delivery timeframe for a new school within the next 5 years.</p> <p>Utilisation and demand data for primary schools indicate there is already a need for one additional Government primary school to serve Bacchus Marsh and Maddingley. Demand forecasts also indicate the need for another new school in Maddingley within 5 to 10 years. Council will therefore continue to liaise with DET regarding the potential for a new school at the existing Government-owned site at Connor Street, Bacchus Marsh and/or an alternative site yet to be identified by DET. It is not expected that a new school serving Hopetoun Park will be justified in terms of the size of population that would result from anticipated levels of development. Instead, a new school serving Merrimu, Parwan Station and/or Maddingley would provide the necessary provision for residents of Hopetoun Park. A new school at Merrimu or Parwan Station would need to be planned for via a future PSP process, however, planning for new schools in Bacchus Marsh and Maddingley must be addressed as a matter of priority.</p> <p>The UGF acknowledges the importance of education (refer to Element 3) and the need for new education facilities to cater for the growing population.</p> <p>However, it is recommended that the UGF be amended as follows, to more specifically address the current need for a</p>

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				<p>primary school in Maddingley, and also to reduce the risk of this issue arising in future residential growth precincts:</p> <p>Under the heading 'Future community facilities needed':</p> <ul style="list-style-type: none"> <li>• <u>Future primary schools:</u> - With the growth in younger families in Bacchus Marsh, primary schools are a high priority. <u>Precinct structure plans for new growth areas should identify suitable sites for government and non-government primary schools within reasonable walking distance of the communities they are planned to service.</u></li> <li>• <u>Existing S secondary schools</u> (Bacchus Marsh College and Bacchus Marsh Grammar) – <del>f</del><u>Future</u> planning of these precincts will be necessary to ensure that there is more effective access, scope for new parking, and better pedestrian and cycling<u>ing</u> access, as well as provision for future facilities.</li> <li>• <u>Future secondary schools:</u> - Council will work with the <u>Department of Education and Training to identify a suitable site for a new government secondary school within the new residential growth precincts, wherever there is a demonstrated need.</u></li> </ul> <p>Tables 1 and 3 – Key growth actions – state/regional:</p> <p>It is recommended that a new UGF action be added, regarding the need to determine short term needs for Government primary schools in Bacchus Marsh and Maddingley. Schools in new growth areas may need to accommodate existing demand, however, future growth precincts are not well located to service existing under-provision. Planning is therefore</p>

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				required to address existing demand. This cannot be left to future PSP processes.

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19	124 Hopetoun Park Road	Supports amendment subject to changes	<p>Our client has recently purchased approximately 58 hectares of land 124 Hopetoun Park Road, Hopetoun Park (almost half of the proposed Hopetoun Park North Growth Area).</p> <p>By and large, our client supports Am C81 and congratulates both Moorabool Shire Council and the VPA on the significant body of strategic planning work underpinning this large Amendment. Am C81 provides a clear direction on the future urban structure of Bacchus Marsh. Having commenced back in 2014, the Bacchus Marsh UGF has undergone significant informal and now formal consultation with the community and relevant stakeholders. It is submitted that there has been a rigorous process of identifying opportunities and constraints for future growth options in Bacchus Marsh as outlined in the October 2017 document.</p> <p><u>Hopetoun Park North Growth Area:</u></p> <p>The resultant designation of Hopetoun Park North as a future growth area is one that is sound based on a number of important considerations and one which will deliver a clear net community benefit with the proposed inclusion and early delivery of a local activity centre in addition to some local level community facilities. In particular, our client supports the designation of Hopetoun Park North as a "future residential growth precinct" on the proposed Urban Growth Framework Map at Clause 21.07.</p> <p>It is respectfully submitted however, that there be some minor changes to the Amendment to better advance the objectives of the Moorabool Planning Scheme.</p>	<p>It is recommended that the following changes be made to the exhibited MSS clauses, in response to the requested changes:</p> <p>Clause 21.07-2 Bacchus Marsh – Objective – Managing Urban Growth:</p> <p>Objective number one:</p> <ul style="list-style-type: none"> <li>To accommodate <u>medium to</u> long term residential growth within the investigation areas at Merrimu, Parwan Station and Hopetoun Park.</li> </ul> <p>Strategy number one:</p> <ul style="list-style-type: none"> <li>Contain short <del>to medium</del> term residential development within the existing settlement boundary (infill and greenfield).</li> </ul> <p>Strategy number three (N.B. It is agreed that the ELR is not critical for Hopetoun Park North precinct):</p> <ul style="list-style-type: none"> <li>Provide for medium to long term residential growth within the investigation areas at Merrimu, <u>and</u> Parwan Station <del>and Hopetoun Park</del>. Medium-term timing may be considered for one or more growth precincts if it can be demonstrated that such precinct/s will facilitate the provision of an ELR.</li> </ul> <p>Add strategy number four:</p> <ul style="list-style-type: none"> <li><u>Provide for medium term residential growth within the investigation area at Hopetoun Park, subject to demonstrating how the precinct will facilitate improved connectivity with the Western Freeway, to and from the west along with an acceptable level of community facilities/amenities in accordance with Council's Community Infrastructure Framework.</u></li> </ul> <p>Clause 21.07-7 Bacchus Marsh - Implementation:</p>

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			<p><u>Specific suggested changes:</u></p> <p>Proposed Clause 21.05-5: The second dot point relates to Developer Contributions and how they might be implemented. A suggested edit is to include the use of Section 173 Agreements as a potential implementation mechanism as an effective way to deliver infrastructure where there are relatively few land owners.</p> <p>Clause 21.07-2: Second paragraph should be amended to "To accommodate medium to long term growth within the investigation areas at Merrimu, Parwan Station and Hopetoun Park"</p> <p>In addition, the first dot point under Strategies should be amended to remove "medium term" so that short term residential growth is contained within the settlement boundaries and not medium term.</p> <p>The third bullet point under Strategies should just relate to Merrimu and Parwan Station as Hopetoun Park is not related to the ELR. Rather, Hopetoun Park should have its own bullet point which says "Provide for Medium Term residential growth at Hopetoun Park".</p> <p>Justification for above changes to 21.07-2: Hopetoun Park is capable of being developed in the short to medium term for the following reasons:</p> <ul style="list-style-type: none"> <li>It is by far the smallest of the proposed growth areas with additional supply of 3-5 years according to the Bacchus Marsh Urban Growth Framework (page 81) and even if brought forward to today would not result in oversupply of the market.</li> </ul>	<p>Add the following:</p> <ul style="list-style-type: none"> <li><u>Apply the Development Plan Overlay to any urban growth precinct at Hopetoun Park.</u></li> </ul> <p>The following requested changes are not supported for the reasons stated:</p> <p>Clause 21.05-5 Development and Community Infrastructure – Implementation:</p> <ul style="list-style-type: none"> <li>Section 173 agreements cannot be mandated. They are a voluntary mechanism, subject to ‘agreement’ between the parties.</li> <li>Despite Hopetoun Park North being subject to a Development Plan Overlay rather than a PSP, it may still be appropriate to apply either a Development Contributions Plan Overlay or an Infrastructure Contributions Plan Overlay. This would ensure the equitable application of development contributions across all growth precincts.</li> </ul> <p>Timing of Hopetoun Park North precinct:</p> <p>There is no strategic justification for delivery of this precinct within the short term (i.e. within 5 years), as there is an adequate land supply within the existing urban area. Given the limited size of the land investigation area and the lacks a direct relationship with the delivery of the ELR (i.e. one is not contingent on the other), Hopetoun Park North should be a medium term project. Medium term timing is considered appropriate for Hopetoun Park North the following reasons:</p>



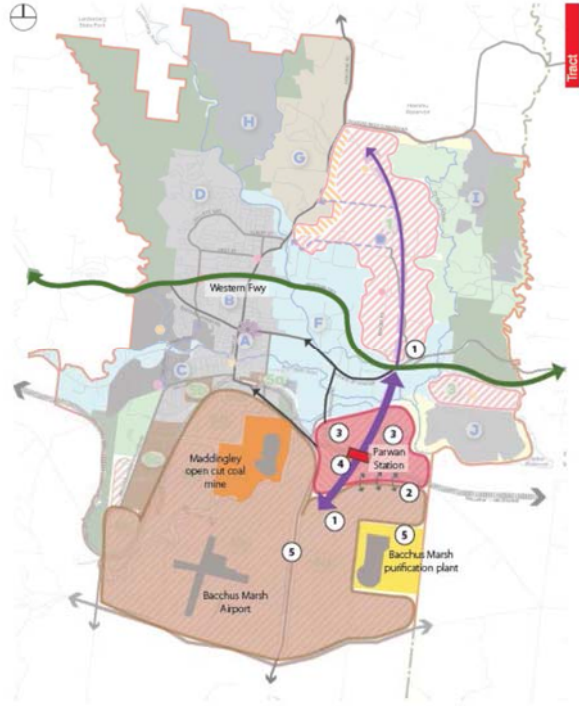
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			<ul style="list-style-type: none"> <li>• It does not require the costly, detailed and time consuming Precinct Structure Planning in this area.</li> <li>• This area is also relatively un-fragmented in ownership.</li> <li>• This area is the only one of the growth areas which is contiguous with an existing residential community</li> <li>• It is relatively easy to service with existing utilities.</li> <li>• It is likely to have a larger average lot size than the other growth areas in Bacchus Marsh and therefore provide a point of difference and a unique offer to the market.</li> <li>• Short to medium term development can provide much needed retail and community infrastructure to the existing Hopetoun Park area.</li> <li>• Spatial Economic report found that it was most likely that there was 20 years worth of land supply in Bacchus Marsh at September 2015 (less than 18 years today). Even the best case scenario for land being available to the market at Hopetoun Park North is 3 years from now (1 year Am C81, 1 year for rezoning and 1 year for DP &amp; permits) which will mean there would be only the minimum 15 years worth of supply left at that point. This is the minimum level required under state government policy. As a result of the long lead times involved, there is justification for consideration of the rezoning of Hopetoun Park immediately after the gazettal of Am C81 to ensure an adequate supply of land in Bacchus Marsh.</li> <li>• The "Medium Term" timing is consistent with Table 1 in the Bacchus Marsh Urban Growth Framework October 2017 document which is proposed to be a reference document in the scheme.</li> </ul> <p>Proposed Clause 21.07-7:</p>	<ul style="list-style-type: none"> <li>• The adopted housing strategy titled 'Housing Bacchus Marsh to 2041' (dated 2017) as amended by more recent growth analysis (Spatial Economics, 2017) concludes that there is around 18-20 years of broad hectare supply (with 14 years under a 4.2% growth rate). This means there is no short term imperative to act on Hopetoun Park.</li> <li>• Council will need to undertake a range of complex strategic work for the whole Bacchus Marsh District to give guidance for growth planning within Bacchus Marsh district as a whole. This work needs to be undertaken prior to the preparation of any individual future PSP or planning scheme amendment, including: <ul style="list-style-type: none"> <li>○ Integrated infrastructure delivery framework (which addresses all higher order infrastructure needs and means of delivery to inform PSP/Development Plan, DCPs and ICPs or s173 Agreements).</li> <li>○ Integrated Water Management Plan (providing principles to address a range of sustainable water management priorities within the district).</li> <li>○ District Open Space Framework (this is a 2018/19 budget bid and is already in the UGF), to address key principles to protect escarpments, achieve biolinks, integrate open space outcomes with waterway management etc.</li> <li>○ Update the Bacchus Marsh Integrated Transport Strategy, to include consideration of the Bacchus Marsh Urban Growth Framework.</li> </ul> </li> <li>• Proponents of development in this precinct will need to undertake a range of technical studies relating to each precinct and surrounds, such as biodiversity, bushfire risk, cultural and European heritage, integrated transport, infrastructure, etc.</li> <li>• However, equally it is conceded that at the densities likely to be achieved in Hopetoun Park (&lt;10 dw/ha net) that only some 600-700 homes would be built or 2 years supply.</li> </ul>

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			<p>The second last bullet point states "Apply either the Low Density Residential Zone or the Neighbourhood Residential Zone to any urban growth precinct at Hopetoun Park".</p> <p>We submit that this is overly prescriptive at this stage and could more appropriately be reworded to "Apply an appropriate residential zone to the urban growth precinct at Hopetoun Park". This leaves the options open for any zone in the suite of residential zones to be applied as the most appropriate as considered by Council, VPA and or a Planning Panel at that point in time.</p> <p>Under this "Implementation" clause, Council may also consider making reference to the application of the DPO here.</p>	<p>Provided community facility investments were made (funded by the proponent) and access/road improvements were facilitated, a medium term timeline would be supportable.</p> <p>It is recommended that the UGF be amended:</p> <ul style="list-style-type: none"> <li>• to clearly articulate the above strategic work as pre-conditions for the preparation of any future planning scheme amendment; and</li> <li>• to allow for consideration of earlier timing if these pre-conditions are met, and if the precinct can demonstrably deliver improved connectivity with the Western Freeway to and from the west, along with an acceptable level of community facilities/amenities in accordance with Council's Community Infrastructure Framework.</li> </ul> <p>Clause 21.07-7 Bacchus Marsh - Implementation:</p> <ul style="list-style-type: none"> <li>• There is sound justification for applying either the Low Density Residential Zone (LDRZ) or the Neighbourhood Residential Zone (NRZ) to the Hopetoun Park North precinct, as these zones enable minimum lot sizes to be specified. The application of LDRZ may be appropriate around the periphery of the precinct, at the interface with the freeway to the north, the existing LDRZ to the south, the Bacchus Marsh Irrigation District to the west and green wedge land to the east. The application of NRZ may be appropriate in the core of the precinct, to facilitate a walkable catchment for any future neighbourhood activity centre.</li> <li>• The General Residential Zone is unlikely to be supported by TfV due to poor transport connectivity, difficulties in servicing the precinct with public transport (i.e. buses) and</li> </ul>

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				<p>limited potential for sustainable transport (i.e. walking and cycling).</p> <ul style="list-style-type: none"> <li>• Furthermore, the precinct is more distant from Bacchus Marsh than the other precincts, and has less potential for the provision of its own community facilities and retail services.</li> </ul>

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20	Parwan Station Precinct (north of rail line)	Supports amendment subject to changes	<p>The Parwan Station Precinct is well placed to accommodate future growth before and after the delivery of the ELR as it is located in close proximity to the existing Bacchus Marsh station, schools and an employment precinct. To ensure the early delivery of the ELR development of the Parwan Station Precinct must be able to commence and sufficient funds raised to achieve a staged delivery of the road.</p> <p>The nucleus of the precinct will be the future Parwan train station around which a commercial neighbourhood shopping centre and higher density residential development will locate. The precinct will also contain high amenity areas given its location to the Werribee River and will have direct access to the Western Highway and Geelong Road. Tract Consultants in consultation with Insight Planning Consultants have identified the following benefits associated with the early development of the Parwan Station Precinct:</p> <ol style="list-style-type: none"> <li>1. Improved transport connections to the east (ELR): <ul style="list-style-type: none"> <li>- Ability to stage the southern section of Eastern Link to connect Western Fwy to Geelong – Bacchus Marsh Rd via Parwan station</li> <li>- Connect future Parwan community directly with Avenue of Honour and Western Fwy</li> <li>- Connect future Parwan community directly back into Bacchus Marsh centre of town</li> </ul> </li> <li>2. More local jobs <ul style="list-style-type: none"> <li>- Direct adjacency to identified employment land to the south</li> <li>- Readily stageable connections into development of employment from residential precincts</li> </ul> </li> <li>3. New residential areas (with schools and recreational facilities)</li> </ol>	<p>Timing of Parwan Station precinct:</p> <p>The exhibited MSS Clause 21.05-3 lists a number of objectives and strategies which will ensure the delivery of 'integrated transport' within and beyond the new growth precincts. Clause 21.05-4 includes an objective "<i>to provide appropriate levels of community facilities and infrastructure ....</i>". It includes a strategy to "<i>require new development to make financial contributions to the provision of community facilities and infrastructure, such as roads, bicycle paths, footpaths, public transport, ....., via development contribution plans or infrastructure contribution plans</i>".</p> <p>The State government has committed \$3M for an ELR corridor planning study which will likely take two to three years to complete. This study will identify one or more preferred road alignment options, based upon identified constraints such as environmental values/risks, quality agricultural land, heritage, landholdings, etc.</p> <p>The delivery of this road is fundamental to the success of future growth, particularly the potential PEP, and Merrimu and Parwan Station growth precincts. However, at this point in time, no funding has been committed to construction of this road.</p> <p>It is acknowledged that some development could potentially occur within the growth precincts prior to the construction of the ELR, subject to the provision of upgrades to the local road network.</p> <p>It is therefore recommended that the UGF and exhibited MSS clauses be amended to include a short term action to undertake traffic modelling to identify the maximum number of lots which can be developed in each growth precinct prior to</p>

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			<ul style="list-style-type: none"> <li>- Ability to achieve a critical mass for an integrated new community including a school, open space and a town centre</li> <li>4. Future second train station               <ul style="list-style-type: none"> <li>- Land can be staged and developed independent of and prior to the construction of Parwan station</li> <li>- Locate and stage residential and local centre to co-locate with and complement the station once it arrives</li> </ul> </li> <li>5. A deliverable new community               <ul style="list-style-type: none"> <li>- Readily developable residential land</li> <li>- Stagable road access and connections into existing major road network</li> <li>- Readily connected sewer connections to sewerage treatment plant</li> <li>- Residential stages can be developed in line with the construction of Eastern Link.</li> </ul> </li> </ul>	<p>the ELR being constructed, and the local road network improvements necessary to facilitate such development.</p> <p>Also, the precinct planning principles in the UGF should be amended, to require that PSPs for Parwan Station and Merrimu urban growth precincts identify the maximum number of lots which can be developed in each growth precinct prior to the ELR being constructed, and the local road network improvements necessary to facilitate such development.</p> <p>The UGF states (in Table 5 - Sequencing; page 89-91) that the timing for the Bacchus Marsh existing urban area is short term. Timing for Parwan Station and other residential growth precincts is stated to be medium to long term, but sequencing can be brought forward if supported by sufficient assessments. The UGF also states that timing is dependent on land supply and demand analysis in the first instance, but sequencing should be brought forward if the precinct can demonstrably deliver the ELR. Medium term is stated to be 5-10 years, while long term is 10+ years.</p> <p>There is, however, an error in the exhibited MSS Clause 21.07-2, as the objective relating to Merrimu, Parwan Station and Hopetoun Park is inconsistent with the relevant strategy, and is also inconsistent with the timing expressed in the UGF.</p> <p>It is therefore recommended that the objective under Clause 21.07-2 be amended as follows:</p> <ul style="list-style-type: none"> <li>• To accommodate <u>medium to long term</u> residential growth within the investigation areas at Merrimu, Parwan Station and Hopetoun Park.</li> </ul> <p>Strategy number three under the exhibited MSS Clause 21.07-2 states that “..... <i>Medium-term timing may be considered for one or more growth precincts if it can be</i></p>

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			 <p><b>Figure 9</b></p> <p>Generally, we are supportive of the UGF, Amendment C81 and all supporting documentation. We believe that the UGF is a detailed blueprint of how the Bacchus Marsh region should develop into the future and provides an excellent initiative to drive such growth. However, we believe that there are some minor changes to the exhibited planning scheme amendments that will improve the implementation of the UGF.</p>	<p><i>demonstrated that such precinct/s will facilitate the provision of an ELR.”</i></p> <p>The timing expressed in the UGF with respect to the urban growth precincts is intended to refer to the timing for a planning scheme amendment to rezone land and incorporate a precinct structure plan where relevant. Medium to long term timing is considered appropriate for Parwan Station, for the following reasons:</p> <ul style="list-style-type: none"> <li>• The adopted housing strategy titled ‘Housing Bacchus Marsh to 2041’ (dated 2017) as amended by more recent growth analysis (Spatial Economics, 2017) concludes that there is around 18-20 years of broadacre supply (with 14 years under a 4.2% growth rate). This means there is no short term imperative to act on Parwan Station.</li> <li>• The ELR corridor planning study, which has recently been commenced by VicRoads and is expected to take approximately 2-3 years to complete. It is crucial that the road alignment be confirmed prior to the preparation of any future PSP or planning scheme amendment; <ul style="list-style-type: none"> <li>○ Council will need to undertake a range of complex strategic work for the whole Bacchus Marsh District to give guidance for growth planning within Bacchus Marsh district as a whole. This work needs to be undertaken prior to the preparation of any individual future PSP or planning scheme amendment, including Integrated infrastructure delivery framework (which addresses all higher order infrastructure needs and means of delivery to inform PSP, DCPs and ICPs).</li> <li>○ Integrated Water Management Plan (providing principles to address a range of sustainable water management priorities within the district).</li> </ul> </li> </ul>

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			<p>For ease of understanding this submission outlines each matter of concern, a short summary of the matter and a requested change that we believe will enhance the deliverability of the Bacchus Marsh UGF Plan and importantly progress the planning process towards the Precinct Structure stage.</p> <p><u>Proposed changes to the Bacchus Marsh Urban Growth Framework Plan:</u></p> <p><i>Timing:</i></p>	<ul style="list-style-type: none"> <li>○ District Open Space Framework (this is a 2018/19 budget bid and is already in the UGF), to address key principles to protect escarpments, achieve biolinks, integrate open space outcomes with waterway management etc.</li> <li>○ Undertake traffic modelling to identify the maximum number of lots which can be developed in each growth precinct prior to the ELR being constructed, and the local road network improvements necessary to facilitate such development.</li> <li>○ Update the Bacchus Marsh Integrated Transport Strategy, to include consideration of the Bacchus Marsh Urban Growth Framework.</li> <li>○ Maddingley WRR Hub Planning Study, for the WRR Hub site and associated amenity buffer area, to determine appropriate planning zone and overlay controls.</li> </ul> <ul style="list-style-type: none"> <li>● Proponents of development in this precinct will need to undertake a range of technical studies relating to each precinct and surrounds, such as biodiversity, bushfire risk, cultural and European heritage, integrated transport, infrastructure, etc.</li> </ul> <p>It is recommended that the UGF be amended, to more clearly articulate the above as pre-conditions for the preparation of any future PSP or planning scheme amendment, and to allow for consideration of earlier timing for PSPs if these pre-conditions are met and if the precinct can demonstrably deliver the applicable sections of the ELR (i.e. Merrimu for the northern component and Parwan Station for the southern component).</p> <p>See above.</p>

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			<p>The <i>Bacchus Marsh Integrated Transport Strategy (2015)</i> identified the need for key infrastructure such as the ELR and the UGF Background Report also notes that this road project has been 'flagged' within the planning scheme for the past 10 years. Furthermore, the Economic Development Strategy (2015) provided a recommendation to pursue the ELR extension as the infrastructure priority for the Shire.</p> <p>Table 1 of the UGF (Page 8) notes that the timing of development for the Parwan Station Precinct is medium term, 5-10 years; however, Tables 3 &amp; 5 of the UGF state the timing of this area is medium to long term. All three tables note that this timing can be brought forward if there are significant contributions to the ELR construction funding. As noted above development of the Parwan Station Precinct must be able to commence and sufficient funds raised to ensure a staged delivery of the ELR.</p> <p>Firstly, it is considered necessary that all the tables within the UGF are consistent in terms of timing.</p> <p>Section 7 – <i>Housing and Infrastructure</i> of the Background Report notes that it may be 'necessary to begin forward planning for future land releases in the medium term. This can be brought forward if needed infrastructure such as the ELR is facilitated'. Given the importance of the ELR in terms of the integrated transport strategy it is considered crucial that the timing for actions linked to funding the Road be brought forward to the short term.</p>	<p>It is recommended that Table 1 the UGF be amended, to state that:</p> <ul style="list-style-type: none"> <li>• The timing for Parwan Station and Merrimu precincts is 'medium <u>to long</u> term', consistent with Tables 3 and 5.</li> <li>• The timing for Parwan Employment Precinct is 'short <u>to medium</u> term', consistent with Tables 3 and 5.</li> </ul> <p>Agreed.</p> <p>Disagree, for the reasons stated above.</p>



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			<p>As such it is requested that the UGF be amended to ensure that actions that provide funding to the ELR have short term timing.</p> <p><i>Precinct boundaries</i></p> <p>Tables 1, 3 &amp; 5 of the UGF show the timing for the Parwan Employment Precinct (PEP) as being short to medium term which potentially means that this area will be planned prior to the Parwan Station Precinct. One of the actions for the Parwan Station Precinct shown in <i>Table 5 – Sequencing</i> is to define southern and western boundaries with applicable buffers. Given that the PEP abuts the Parwan Station Precinct to the south and west then this action needs to be undertaken through the planning of the PEP.</p> <p>The UGF Background Report notes that the southern boundary of the Parwan Station Precinct has been derived from a 1,400m separation distance from the Parwan WWTP. However, the Background Report also notes the following:  <i>‘...the performance of any operation that requires buffers to sensitive uses can vary over time as technology changes and operational efficiencies are sought. Likewise EPA conditions and modelling practices (including codes of practice) will likely also change over time. With growing pressure for development in Bacchus Marsh district, operational practices in the past may no longer be appropriate into the future. This will need to be negotiated and it is an assumption of Council that all stakeholders (including agencies) will act in good faith to provide equitable and feasible land use and environmental solutions. The modelling undertaken therefore should only be seen as</i></p>	<p>Disagree, for the reasons stated above.</p> <p>Agreed. It is recommended that Table 5 the UGF be amended, to include the following action in relation to PEP:</p> <ul style="list-style-type: none"> <li>• <u>Define the northern precinct boundary with applicable buffers.</u></li> </ul> <p>Disagree. 1,400m is considered an absolute minimum buffer to meet EPA requirements. It therefore needs to remain. As per submission 26, Western Water is about to commence an odour dispersion modelling project, to determine the area impacted by the operations of the Bacchus Marsh RWP, now and into the future. Once the modelling exercise has been completed, Western Water intends to begin a planning scheme amendment process to apply an Environmental Significant Overlay (ESO) over the buffer area.</p>

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			<p><i>a first pass assessment with a desire of all stakeholders to refine and improve processes before any development occurs in the residential investigation areas'.</i></p> <p>Thus, it is submitted that as the modelling is a 'first pass assessment' it should not be used to categorically define the boundaries of the precincts within the UGF. Instead the boundaries should be noted as being 'subject to further investigation' so that further odour modelling and analysis can refine the form of the residential areas. Considering that the planning for the PEP will potentially occur first then the 'further investigation' should take place at this time and as such should become a key action for the PEP area.</p> <p>Finally, the UGF Plan shows a buffer interface from the Parwan WWTP being located within the Parwan Station Precinct; however the 1,400m buffer distance does not fall within the Precinct area and as such the 'buffer interface' should be located wholly within the PEP area to the south.</p> <p><u>Requested Change:</u></p> <ol style="list-style-type: none"> <li>1. Tables 1, 3 and 5 of the UGF be amended so that the timing of key actions of the Parwan Station Precinct be delivered in the short - medium term.</li> <li>2. That the second note of Tables 1 &amp; 3 of the UGF be amended to read as follows:</li> </ol>	<p>Agreed, however, it is recommended that the precinct planning principles for Parwan Station precinct (page 79) be amended as follows, to articulate a requirement that additional buffers beyond 1.4 km (inside Parwan Station precinct) should be negotiated between proponents of change and Western Water with the goal of ensuring industry, in this case the Bacchus Marsh RWP, is sufficiently designed to contain odour emissions:</p> <ul style="list-style-type: none"> <li>• <u>Ensure that land zoned for sensitive uses is located beyond the buffer distance to Bacchus Marsh Recycled Water Plant as determined in Western Water's odour dispersion modelling project; or work with Western Water to deliver treatment plant upgrades to facilitate a reduced buffer distance. Any reduced buffer distance must be at least 1.4 km and will be subject to the proponents committing to a substantial financial contribution towards treatment plant upgrades.</u></li> </ul> <p>Not supported, for the reasons stated above.</p> <p>Not supported, for the reasons stated above. It is recommended that the notes under Tables 1, 3 and 5 in the UGF be amended, so that they are consistent with strategy number three under the exhibited MSS Clause 21.07-2 which</p>

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			<ul style="list-style-type: none"> <li>- 'Timing can be brought forward to short term if a detailed funding strategy to deliver the ELR can be established'.</li> </ul> <p>3. That the final note of Table 5 of the UGF be amended to read as follows:</p> <ul style="list-style-type: none"> <li>- 'Timing dependent on land supply and demand analysis in the first instance, but timing should be brought forward to the short term if a detailed funding strategy to deliver the ELR can be established'.</li> </ul> <p>4. Table 5 of the UGF be amended to include the following action for the PEP area:</p> <ul style="list-style-type: none"> <li>- 'Undertake further investigation of applicable buffers to define the shared boundaries of the Parwan Station Precinct'.</li> </ul>	<p>states that “..... <i>Medium-term timing may be considered for one or more growth precincts if it can be demonstrated that such precinct/s will facilitate the provision of an Eastern Link Road.</i>”</p> <p>Not supported. See above.</p> <p>The PEP project will likely inform the UGZ boundary at Parwan Station. It can define the final boundary, noting that all that is identified now is the investigation area, not an urban zone boundary. As discussed above, it is recommended that Table 5 of the UGF be amended, to include the following action in relation to PEP:</p> <ul style="list-style-type: none"> <li>• <u>Define the northern precinct boundary with applicable buffers.</u></li> </ul> <p>Council is committed to protecting existing industries (including the BM RWP) from encroachment by sensitive uses (see response to submissions 7, 13, 15, 17 and 26). 1.4 km<sub>s</sub> is considered an absolute minimum buffer to meet EPA requirements for the Bacchus Marsh RWP, and this buffer therefore needs to remain. Western Water is about to commence an odour dispersion modelling project, which will determine the ultimate buffer area and will inform the future application of an ESO. The Pacific Environment odour assessment (2017) recommends a buffer of 1.4 kms which is the EPA guideline separation distance for the current treatment plant operations. As demonstrated in the odour assessment, a buffer distance of 1.4 kms also provides</p>

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			<p>5. That the note on all relevant plans within the UGF be amended to read as follows:  - 'Boundary alignment subject to further investigation'.</p> <p>6. The buffer interface area be removed from the southern section of the Parwan Station Precinct from all relevant plans of the UGF.</p> <p><u>Proposed changes to the Exhibited Clause 21.03 – Settlement and Housing:</u></p> <p>The Parwan Station Residential/Commercial Growth Precinct including the future railway station is nominated by the UGF as a strategic outcome area to support the growth of Bacchus Marsh. Additionally, the UGF also identifies the preparation of the Precinct Structure Plan (PSP) and rezoning of land as being key growth actions. However, the proposed changes to Clause 21.03 do not include any specific strategies to facilitate the development of this area or any other residential growth areas.</p> <p>The UGF notes that growth within the identified outcome areas, including the Parwan Station Precinct, will be guided by precinct planning. The UGF also notes that the timing of the rezoning and PSP preparation actions for the Parwan Station Precinct area is classified as being medium to long term which can be</p>	<p>necessary separation from the broiler farm located on Parwan South Road.</p> <p>Not supported. See response to item 4 above.</p> <p>Agreed. It is recommended that the UGF plans be amended, to delete the narrow strip of buffer interface within the Parwan Station precinct, adjacent to the southern boundary.</p> <p>The UGF (in Tables 1 and 3) nominates the proponent as being responsible for delivering Parwan Station and Merrimu growth precincts. Thus, there is no need for the exhibited MSS Clause 21.03 to list future strategic work to be undertaken by Council. There is a discrepancy with respect to responsibility for the Hopetoun Park North growth precinct. For consistency, it is recommended that Table 1 in the UGF be amended to nominate the proponent as being responsible.</p>

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			<p>brought forward if there are significant contributions to the ELR construction funding.</p> <p>In order to facilitate the development of the Parwan Station Precinct and improve the implementation of the UGF it is submitted that Clause 21.03 should contain strategies that encourage the rezoning of the land to Urban Growth and the preparation of a Precinct Structure Plan as it will be this process that initiates the significant contribution towards the ELR. That is, development is required in order to generate the development contribution.</p> <p><u>Requested Change:</u></p> <p>7. Include the following Strategy under Clause 21.03-2:</p> <ul style="list-style-type: none"> <li>- - 'Facilitate the development of the Parwan Station Precinct by preparing a precinct structure plan, a development/infrastructure contributions plan and a clear funding model'.</li> </ul> <p>8. Include the following specific application of zones and overlays under Clause 21.03-6-Implementation:</p> <ul style="list-style-type: none"> <li>- - 'Apply the Urban Growth Zone to all land within the Merrimu, Parwan Station and Parwan Employment precincts of the Bacchus Marsh Urban Growth Framework Plan'.</li> </ul>	<p>Disagree. This is unnecessary, as the UGF anticipates that the residential growth precincts will be delivered by the proponent (see above). The exhibited MSS Clause 21.07-7 (Implementation) includes a strategy to:</p> <ul style="list-style-type: none"> <li>• "Apply the Urban Growth Zone to the investigation areas at Merrimu, Parwan Station and Merrimu."</li> </ul> <p>Disagree. This is unnecessary. The exhibited MSS Clause 21.07-2 (Objective – Managing urban growth) includes a strategy to:</p> <ul style="list-style-type: none"> <li>• "Require and implement precinct structure plans for any urban growth precincts at Merrimu and Parwan Station, and a development plan for any growth precinct at Hopetoun Park, and ensure that such plans provide for early delivery of appropriate community and social infrastructure, activity centres, schools, integrated transport, reticulated services and local job opportunities."</li> </ul> <p>Disagree. This is unnecessary. As per above comments, the exhibited MSS Clause 21.07-7 (Implementation) includes a strategy to apply the UGZ.</p>

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			<p><u>Proposed changes to the Exhibited Clause 21.04 – Economic Development and Employment:</u></p> <p>The Parwan Station Precinct is shown as being a future residential/commercial growth precinct within the UGF and has abuttal to the west and south to the Parwan Employment Precinct (PEP) and as such it is submitted that there could be potential conflicts between industries and sensitive uses. Thus, it is submitted that areas within the Parwan Station Precinct and the PEP that are located close to future residential areas be designated for uses such as service industries that have less impact on sensitive uses.</p> <p>It is considered illogical that a heavy industrial use that generates a buffer to a sensitive use could be allowed to locate close to the southern boundary of the Parwan Station Precinct so that it could potentially generate buffers that impact land surrounding the future train station. The UGF nominates the area surrounding the future Parwan train station as being suitable for high density residential. It is noted that Page 76 of the UGF includes the following action: <i>'Prepare a land use amenity plan to provide appropriate buffers to sensitive uses and avoid incompatible land uses'.</i></p> <p>It is suggested that the exhibited Clause 21.04 mentions this 'amenity plan' to ensure that commercial or industrial uses located within the PEP adjacent to the southern boundary of the Parwan Station Precinct do not generate a need for buffers from sensitive uses. It is submitted that there is sufficient land within the PEP to</p>	<p>As per the response to submissions 7, 13 and 17, it is acknowledged that the UGF Plans 1, 3, 4, 5, 6, 7 and 8 are ambiguous with respect to buffers. The intention is that no sensitive uses will be allowed within buffer interface areas. Intensive agricultural uses and polluting industrial uses should also be prohibited within buffer interface areas. Only appropriate uses without potential for adverse amenity impacts (i.e. uses not listed under VPP Clause 52.10) should be allowed to establish within these areas. It is recommended that the UGF plans and the plan in MSS Clause 21.07 be amended accordingly.</p> <p>See above.</p> <p>See below.</p>

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			<p>locate heavy industrial uses that generate significant buffers to sensitive uses.</p> <p><u>Requested Change:</u></p> <p>9. Include the following Strategy under Clause 21.04-4:</p> <ul style="list-style-type: none"> <li>- - 'Avoid incompatible future land use conflicts by preparing a land use amenity plan that ensures any new industrial use with the Parwan Employment Precinct is adequately separated from sensitive uses, further than any buffer that the use may generate. This is particularly important adjacent to the southern boundary of the Parwan Station Precinct of the Bacchus Marsh Urban Growth Framework Plan'.</li> </ul> <p><u>Proposed changes to the Exhibited Clause 21.07 – Bacchus Marsh:-</u></p> <p>It is noted that this Clause contains Strategies to require and implement precinct structure plans for the Parwan Station and Parwan Employment Precincts and also contains specific applications for the Urban Growth Zone for these areas. However, it is considered that this Clause should also make reference to a land use amenity plan to ensure that future residential areas of the Parwan Station Precinct are protected from buffers generated by heavy industrial uses.</p> <p>This Clause requires separation between residential development and existing uses with off-site impacts such as the Maddingley Brown Coal Mine. However, there is no requirement that acknowledges the potential conflict between future industrial uses within the Parwan Employment Precinct (PEP) and the future residential</p>	<p>Agreed. It is recommended that the exhibited MSS Clause 21.04-4 be amended by adding the following strategy:</p> <ul style="list-style-type: none"> <li>• <u>Avoid incompatible land use conflicts by preparing a land use amenity plan for the Parwan Employment Precinct, to ensure that future land uses with the precinct are adequately separated from sensitive uses.</u></li> </ul> <p>This is not necessary. This issue will be addressed by the above recommended changes to MSS clauses 21.04 and 21.07.</p> <p>See above.</p>

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			<p>uses, particularly those to the south of the Parwan Station Precinct. The potential future Parwan train station is located towards the south of the Precinct and the UGF encourages higher density residential development around this station. Thus, there is a potential for residential development surrounding the train station to be impacted by buffers generated by heavy industrial uses within the PEP which is submitted to be an undesirable outcome for the area.</p> <p>The Background Report also highlights this issue and explicitly states that <i>'significant transitional zones will need to be between Maddingley Brown Coal and the Parwan Wastewater and any future residential development near or around Parwan Station. Within these transitional zones only uses that don't generate additional buffers will be allowed to establish. Further studies on what these uses should include will be delivered via future PSPs'</i>.</p> <p>So again it is considered necessary for this Clause to include a Strategy that requires the preparation of a land use amenity plan so that heavy industrial uses are restricted or even prohibited adjacent to the southern boundary of the Parwan Station Precinct.</p> <p><u>Requested Change:</u>  10. Include the following Strategy under Clause 21.07-2:  - - 'Avoid incompatible future land use conflicts by preparing a land use amenity plan that ensures any new industrial use with the Parwan Employment Precinct is adequately separated from sensitive uses, further than any buffer that the use may</p>	<p>See above.</p> <p>See above.</p> <p>This is not necessary. This issue will be addressed by the above recommended changes to MSS clauses 21.04 and 21.07.</p>



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			generate. This is particularly important adjacent to the southern boundary of the Parwan Station Precinct of the Bacchus Marsh Urban Growth Framework Plan'.	
21	11 Tilley's Road, Maddingley	Comments only	<p>We are the owner and operator of the Maddingley coal mine, landfill, green waste composting facility and owner of the motocross track in Bacchus Marsh. The land holdings are within the Special Use Zone Schedule 1 (SUZ1), Farming Zone (FZ), Industrial 2 Zone (IN2Z) and part Public Park and Recreation Zone (PPRZ).</p> <p>The submitter wishes to ensure that any review of future growth of Bacchus Marsh protects its current land use rights, accounts for expansion of its activities and responds to the significance of the operation in terms of waste management in the region.</p> <p>We acknowledge that proposed changes to the MSS and in particular Clauses 21.07 and 21.04-4 include reference to its operations being "strategically important land uses" and that its operations (amongst others in Bacchus Marsh) are "inherently incompatible with residential development due to their offsite impacts", Clause 21.04-4 has an objective "To protect the ongoing operation of the Maddingley Brown Coal mine, landfill and associated activities".</p>	<p>Noted. The submitter states that they own some land within PPRZ, however, this is incorrect. All of the land holdings are within the SUZ1, FZ and IN2Z.</p> <p>It considered that the exhibited UGF essentially achieves this, albeit with some slightly confusing wording/plan annotations at various points through the document. The concerns raised in this submission can largely be addressed by relatively minor changes to the UGF (including plans) and exhibited MSS clauses, as detailed in the responses to submissions 7 (SV) and 13 (GWWRRG).</p> <p>Refer to changes recommended in response to submissions 7 and 13.</p> <p>Council's consultant, Pacific Environment, has advised that: <i>"Separation distances are meant to be applied to relevant activities and are not meant to be applied to a site boundary, in a general sense. The 2 km buffer distance is specifically in relation to odour from the composting activities. The separation or buffer distance for the solid inert waste landfill operations is much smaller than the composting based buffer distance."</i></p> <p>As per the response to submission 7, the buffer interface area shown on the UGF plans, and the UGF plan in the exhibited MSS Clause 21.07, is 2.0kms from the existing composting</p>

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			<p>We object to the current form and content of “Plan 1 – UGF” which is proposed as part of Clause 21.07. We object to the content of the plan on the basis of the following:</p> <ul style="list-style-type: none"> <li>• The depiction of the “buffer interface” is poorly expressed.</li> <li>• It is not clear how the extent of the buffer has been determined.</li> <li>• The inclusion of a future residential/commercial growth precinct in the buffer area is misleading and entirely speculative. The buffer area should exclude residential and sensitive uses from occurring in the future.</li> <li>• The extent of the future residential/commercial growth precinct is not justified by proper investigation concerning interface management and potential impact from MBC operations.</li> <li>• The basis for the Maddingley Employment Investigation Area is poorly articulated in local policy.</li> </ul>	<p>operations area approved under EPA Licence 45288 (as amended on 22/11/2017). It is recommended that the UGF be amended to clarify this.</p> <p>Refer to changes recommended in response to submissions 7 and 13.</p> <p>Refer to changes recommended in response to submissions 7 and 13.</p> <p>Noted. The Maddingley Employment Investigation Area is located adjacent to existing industrial zoned land and the Maddingley WRR Hub, and is thus constrained by amenity buffers required to protect current and future industrial land uses. As noted in the UGF, this area should be investigated for non-sensitive land uses compatible with existing sensitive use interfaces. It is recommended that the UGF be amended by deleting the word ‘employment’, as this may lead to unrealistic expectations.</p> <p>Refer to changes recommended in response to submissions 7 and 13.</p> <p>Disagree. The concerns relate to one of the strategies for managing urban growth, in the exhibited MSS Clause 27.07-2. The strategy only relates to land use and development within the PEP. The Maddingley WRR Hub is not within the PEP. Also, as per submission 54 (DEDJTR), coal resource extraction at this site is small scale. It is considered that the</p>

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			<ul style="list-style-type: none"> <li>The note on Plan 1 referencing the buffer interface required for sensitive uses includes the text “subject to further investigation”. This note has poor context and is vague having regard to other text found in Clause 21.07.</li> </ul> <p>Further, we object to references in Clause 21.07-2 which suggest the brown coal resource only be protected within “the defined mining licence area”, and the measure for protecting sensitive uses from offsite amenity impacts may be determined by an “area specific environmental study”.</p> <p>We require that a 2 kilometre buffer be maintained to all existing and future operations. It is imperative that no sensitive uses are located within such buffer.</p> <p>MBC objects to the BM UGF 2017 being included in Clause 21.11 as a reference document, as it contains material which is inaccurate in relation to our land and operations. Specifically, Appendix E of the UGF incorrectly indicates that our operation’s growth potential is “restricted within the site”. We do not agree with this proposition.</p> <p>We note the suggestion of applying an ESO to buffer land around the mine site, however, this action does not appear in Clause 21.07-7 which seeks to “Apply the UGZ to the investigation areas at Merrimu, Parwan Station and Parwan Employment Precinct”. Insufficient strategic justification exists to apply such zoning which would give rise to expectations for the preparation of</p>	<p>State significance of the site is primarily due to its role as a waste recovery and recycling (WRR) hub.</p> <p>Refer to comments above.</p> <p>The submitter has misinterpreted the UGF. This comment actually refers to Appendix 4 of the UGF, which relates specifically to constraints for future designated growth areas. The reference to ‘restricted within the site’ relates to urban growth potential, rather than the operations of the mine and landfill. It is recommended that minor changes are made to the text of this Appendix to remove confusion.</p> <p>As per the response to submissions 7 and 13, it is recommended that the UGF (e.g. Tables 1 and 3 – Key growth actions – state/regional) and exhibited MSS clauses be amended to include an action for a planning study to be undertaken (in the short term) for the Maddingley WRR Hub site and associated amenity buffer area, to determine appropriate planning zone and overlay controls (e.g. ESO, DDO). The planning study should also consider options for improved practices at the Maddingley WRR Hub, to reduce amenity buffer impacts on existing sensitive uses. All key stakeholders need to be engaged in this process, including (but not limited to) the operator of the Maddingley WRR Hub, EPA, SV, Grampians Central West Waste and Resource Recovery Group (GCWRRG), Metropolitan Waste and Resource Recovery Group (MWRRG), DEDJTR, VPA and landowners.</p>

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			<p>PSPs to facilitate future urban activity, despite some of the land being affected by our current and future operations.</p> <p>Separately, we make the following observations concerning Amendment C81 within the context of work carried out by Council and the VPA:</p> <p>Pacific Environment Odour Buffer Assessment:</p> <ul style="list-style-type: none"> <li>• No consultation was undertaken with us on the odour buffer assessment.</li> <li>• Condition 27 of PA2011-338 permits relocation of existing composting operations to the north/north-east of existing composting operations “subject to a report being provided to the satisfaction of the responsible authority and the EPA demonstrating that the composting will not have additional, unreasonable impact on the amenity of the nearby receptors (including residential and educational uses) and any land zoned for residential or educational purposes, in comparison to the existing composting operation”. The eastern perimeter of Area 4 would result in encroachment of the 2km buffer applied by Pacific Environment a further 250m to the east into the future residential and commercial precinct.</li> <li>• We were not consulted about the source and frequency of odour complaints. We may receive odour complaints that are not reported to EPA.</li> </ul>	<p>Council's consultants, Pacific Environment, attempted to contact the submitter via telephone in May/June 2017, however, they were not successful. The assessment was completed with conservative assumptions for the emissions estimation and offsite field odour observations.</p> <p>It is acknowledged that condition 27 of PA2011-338 permits the potential relocation of the existing composting operations approximately 250m eastwards. However, it is important to note the details of this permit condition. The wording suggests that, prior to any relocation of the composting activities, the operator would need to demonstrate (to the satisfaction of the responsible authority and the EPA) that odour emissions from the relocated activities would be contained within the odour impact footprint of the existing operations. This may be possible by introducing improved/best practice management, such as the covering and aeration of windrows. Thus, it is not considered necessary to increase the dimensions of the buffer interface between the Maddingley WRR Hub and the Parwan Station precinct, as shown on the UGF plans.</p> <p>See response to dot point one above. Council's consultants, Pacific Environment, have noted that the complaints investigation for the assessment was limited since the EPA</p>

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			<ul style="list-style-type: none"> <li>99.99 percentile 1-5.5 odour units low risk area encompasses more than 50% of the investigation area (future residential and commercial growth precinct). The easterly extent of this potential impact zone extends beyond the buffer interface required for sensitive uses (subject to further investigation) shown on Plan 1 – UGF. We note that the odour assessment completed by Pacific Environment did not consider upset conditions. We support EPA's position that as a minimum, a 2km buffer zone should apply to both existing and future composting operations.</li> </ul> <p>Statewide Waste and Resource Recovery Infrastructure Plan:</p> <ul style="list-style-type: none"> <li>The plan recognises our landfill in Bacchus Marsh as a site <i>"of state importance due to its close proximity to the metropolitan Melbourne area and the tonnes of SIW accepted from Melbourne. The WRRG should work with Moorabool Shire Council to preserve the functionality of the site through adequate planning for suitable buffers and establishing compatible activities. This should include opportunities to increase resource recovery on the site"</i>.</li> </ul>	<p>only provided a summary with minimal detailed information. This is a common occurrence when reviewing complaints data. To further understand actual odour impacts, field odour observations were included as a component of the assessment. The odour observation data were compared against the dispersion modelling results. The combination of odour observation and model results provides a higher level of confidence in the understanding of odour impacts than compared to complaints data review alone.</p> <p>See response to dot point two above.</p> <p>Noted. Refer to changes recommended in response to submissions 7 and 13.</p>

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			<ul style="list-style-type: none"> <li>The plan protects existing uses and recognises protection is required for future uses.</li> </ul> <p>Bacchus Marsh Motocross:</p> <ul style="list-style-type: none"> <li>The motocross occupies part of our land and has 400 members. It is a 24 hr facility.</li> <li>There is a history of motocross tracks being pushed away from new residential developments.</li> <li>The Bacchus Marsh motocross track provides a contained, safe and controlled facility for rider education, activities and events.</li> </ul> <p>Summary of our submission to Amendment C81:</p> <p>Plan 1 Framework Plan for Bacchus Marsh – Clause 21.07 – requires amendment to:</p> <ul style="list-style-type: none"> <li>Clearly and accurately identify the Maddingley coal mine and our landholdings.</li> <li>Clearly identify a buffer to the mine site/operation based on EPA buffer distance of 2km to sensitive uses.</li> <li>Delete the note “subject to further investigation” in the legend in relation to buffer interface land.</li> </ul> <p>Clause 21.07-7 Implementation:</p> <ul style="list-style-type: none"> <li>Amend by including reference to the proposed “application of an ESO around the mine site to account for future coal mining, landfill composting, waste management and motocross activities”.</li> <li>Amend by deleting reference to application of the UGZ to investigation areas.</li> </ul>	<p>Noted. The operations of the motocross facility, and any potential land use impact, will be considered as part of future detailed planning for the Parwan Employment Area. It should be noted that the UGF does not propose any sensitive uses adjacent to the Maddingley WRR Hub site, and therefore none adjacent to the motocross facility.</p> <p>It is recommended that the UGF plans (and associated plan at MSS Clause 21.07) be amended to:</p> <ul style="list-style-type: none"> <li>Specifically identify the Maddingley WRR Hub operations, including the landfill/organics waste component being a state significant asset.</li> <li>Clearly show a 2.0km buffer interface between the existing composting operations and future sensitive uses (i.e. at Parwan Station precinct).</li> <li>Update the relevant legend item relating to the buffer to read “buffer: no sensitive uses”.</li> </ul> <p>It is recommended that the exhibited MSS Clause 21.07-7 (Implementation) be amended as follows:</p> <ul style="list-style-type: none"> <li><u>Apply the Environmental Significance Overlay to the Maddingley Waste Recovery and Recycling Hub and associated amenity buffer areas.</u></li> <li>Apply the Urban Growth Zone to the investigation areas at Merrimu, <u>and</u> Parwan Station <del>and Parwan Employment Precinct.</del></li> </ul> <p>It is recommended that the exhibited MSS Clause 21.07-8 (Further Strategic Work) be amended as follows:</p>

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			Clause 21.11 <ul style="list-style-type: none"> <li>• Delete reference to the BM UGF 2017.</li> </ul>	<ul style="list-style-type: none"> <li>• <u>Undertake a planning study for the Maddingley Waste Recovery and Recycling Hub site and surrounds, to determine appropriate zone and overlay controls.</u></li> </ul> Not supported.

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22	Hopetoun Park North Precinct	Supports amendment subject to changes	<p>The Hopetoun Park area is an excellent development prospect and able to developed sooner than anticipated and should be expanded to include the land bound by the Western Freeway and the Old Western Highway.</p> <p>This expansion is a logical inclusion due to its proximity to the Bacchus Marsh township and Melton and the existing road infrastructure. The existing Hopetoun Park residential area is isolated in relation to services with future development able to be leveraged to provide valuable community infrastructure for existing and future residents.</p> <p>The Hopetoun Park area is the focus of this submission and is made up of three areas including:            Area A – The identified Hopetoun Park North Residential Growth Precinct by the BMUGF.            Area B – Adjacent land to Area A between the Western Freeway and Bacchus Marsh Road.            Area C – The existing residential area of Hopetoun Park.</p> <p>The opportunities include capitalising on the existing access to the Western Highway, the Bacchus Marsh town centre and Melton township and the relatively flat topography of underutilised land with views across the valley. These characteristics enable Hopetoun Park to be developed in the short term. Development in Hopetoun Park will provide valuable community infrastructure within a local activity centre to the benefit of the existing residential population.</p> <p>It is acknowledged that currently Council only identify Area A for future development. However Area B is considered a logical inclusion due to it having identical</p>	<p><u>Area B – Adjacent land to Area A between the Western Freeway and Bacchus Marsh Road:</u></p> <p>This proposal should not be supported, for the following reasons:</p> <ul style="list-style-type: none"> <li>• There is no strategic justification for extending the Hopetoun Park North residential growth precinct to the north of the freeway.</li> <li>• This area was ruled out in the initial constraints assessment, as per page 65 of the UGF:               <ul style="list-style-type: none"> <li>○ This area is closer to a large tract of heavily vegetated land to the north, including the Long Forest Nature Conservation Reserve. Thus, the area could be exposed to landscape scale bushfire risk.</li> <li>○ This narrow slither of land is constrained by the Western Freeway to the south and the Old Western Highway to the north. Any urban development in this area would result in a divided community, with acoustic walls north and south of the freeway. Any urban development would also need to deal with the interface with the Old Western Highway, as per the existing Design and Development Overlay Schedule 3.</li> </ul> </li> </ul> <p><u>Proposed application of General Residential Zone to Areas A, B and C:</u></p> <p>This proposal should not be supported, for the following reasons:</p> <ul style="list-style-type: none"> <li>• The precinct is more distant from Bacchus Marsh than the other precincts, and has less potential for the provision of its own community facilities and retail services.</li> <li>• The General Residential Zone (GRZ) is unlikely to be supported by TfV, due to poor transport connectivity,</li> </ul>



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			<p>interfaces as Area A with access running through the area to service Areas A and C. It is also outside of the gully area which is used for intensive agricultural activities with it having little strategic merit being within the farm zone. It would also be a highly constrained area and become isolated if it were not included.</p> <p>Hopetoun Park can be described as set within a distinctive landscape with a good level of access provided by the existing Western Freeway and Hopetoun Park Road. The area is framed by escarpments, the Werribee River and Djerriwarrh Creek which provide vistas across the valley.</p> <p>Hopetoun Park is to be a low density residential community within a distinctive landscape setting and is to be developed in line with the planning principles as set out by the BMUGF. A local activity centre is located within Area B adjacent to a community facility and a large park to include an existing tree group. This centre is to be complemented by higher density residential development within a 400 metre walkable catchment.</p> <p>The existing large residential lots of Area C are to be integrated with Area A by providing 'Transitional Density Lots' within an area identified along the interface (shown in purple). This is to ensure identified lots are given the opportunity for future intensification to avoid a hard edge between Areas A and C. These lots are included due to their large size and existing access enabling future subdivision. Views from the Western Freeway traveling towards Bacchus Marsh are to be protected through landscape buffers and a transition from low density development on the edges with density increasing moving towards the local activity centre. This</p>	<p>difficulties in servicing the precinct with public transport (i.e. buses) and limited potential for sustainable transport (i.e. walking and cycling).</p> <ul style="list-style-type: none"> <li>• The submission discusses the need for minimum lot sizes to be specified in certain sub-precincts, such as the interface with surrounding land uses (min. 1,000 m<sup>2</sup>), however, this is not possible in the GRZ. Minimum lot sizes can only be specified in the NRZ and LDRZ.</li> <li>• Area C has little or no merit for consideration for inclusion because of greater visual exposure to BMID and surrounds; the encirclement this would create around BMID from the east; the lack of relationship to the existing Hopetoun Park; and general lack of strategic justification.</li> </ul>

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			<p>is achieved by designating areas for 'Rural Residential Lots' which will be in excess of 1000sqm with built form envelopes to provide a buffer area from the Western Freeway and protect the vistas from the Western Freeway across the valley.</p> <p>A higher density residential area (300-380sqm lots) is proposed to activate the central area of Hopetoun Park and utilise the facilities provided with the local activity centre. The effective provision of these services relies on density located in proximity to the centre. The remaining residential development area is to be at a conventional density of 400-450sqm. This mix of densities provides capacity for a range of housing to be provided to meet the varied needs of the growing community.</p> <p>The development of Hopetoun Park will capitalise on the existing road infrastructure and access which is a significant cost saving. The existing road connections could be upgraded through developer contributions to provide an opportunity for a bus route to service the local activity centre and connect Hopetoun Park to Bacchus Marsh and Melbourne.</p> <p><u>Proposed Zoning Changes:</u></p> <ul style="list-style-type: none"> <li>• Apply the General Residential Zone to Areas A, B and C.</li> <li>• Apply the Development Plan Overlay (DPO) to Areas A, B and C, to incorporate the proposed Urban Structure Plan. The DPO will provide guidance for future development and integrate with Area C.</li> </ul>	

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23	32 Long Forest Road, Long Forest	Comments only	I own 32 Long Forest Rd, Merrimu. Farming is no longer viable in this area due to farm size, lack of water, safety of roads with farming equipment, and rezoning of other farming land nearby. Rural Residential may be a better fit.	<p>Not supported, for the following reasons:</p> <ul style="list-style-type: none"> <li>• The suggestion of a rural residential type zone is beyond the scope of the UGF and Amendment C81. The primary purpose of the UGF is to provide a long term framework for urban growth, in order to accommodate the growing population. Thus, the main focus of the growth precincts is to identify land suitable for residential development. The UGF does not need to consider demand for rural residential land.</li> <li>• The subject property adjoins a large tract of heavily vegetated land to the north, including the Long Forest Nature Conservation Reserve. Thus, the area could be exposed to landscape scale bushfire risk. This area was ruled out in the initial constraints assessment, as per page 65 of the UGF.</li> <li>• There is no strategic justification for rezoning this land.</li> </ul> <p>It is recommended that Table 4 (Key growth actions – local) in the UGF be amended as follows: Ref No. 23:</p> <ul style="list-style-type: none"> <li>• <u>Land use investigation project – Swans Road, Darley Rural Residential Strategy – Investigate supply, demand and opportunities for rural residential land uses within Bacchus Marsh district, and in proximity to other towns within the shire.</u></li> </ul>

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24	40 Grant Street, Bacchus Marsh	Comments only	<p>It is only through strong planning controls and strategic planning for development that present and future residents of Bacchus Marsh can continue to enjoy this unique environment. The UGF addresses the complex task of meeting competing expectations for the future. As well as issues of housing and employment, parts of the document address the need for protection of the environment, maintaining sustainability, establishing bio-links and preserving open space. These are vital ambitions and deserve full support! However, the UGF would benefit from a clearer expression of conservation objectives and their clearer integration into the whole planning process. Related to these objectives there is a need for planning controls that will stand the challenges of the subdivision outlined in the Framework!</p> <p><u>UGF Part 2 - Vision and principles:</u> If the Vision is for an attractive landscape, then the Principles should express the need to guard the values that underpin this attractiveness. In Principles, great emphasis is placed on the need to protect areas that are not under the control of the Moorabool Shire, such as Long Forest Nature Conservation Reserve. The Principle related to Natural and built environment should list action to ensure that these values are protected. (How did Market Gardens get to be in this group?) To set aside and protect natural bio-links, flyways and natural areas to ensure that Bacchus Marsh retains its strong connection to the natural environment. Areas around natural features including rivers and creeks, reserves, local state and national parks and escarpments will be set aside from development.</p>	<p><u>UGF Part 2 - Vision and principles:</u> The principle relating to “protect features of natural and built environmental value” states:</p> <ul style="list-style-type: none"> <li>• “Protect valued features such as the Lerderderg and Werribee Rivers, the Avenue of Honour, Long Forest Nature Conservation Reserve, market gardens and escarpments.”</li> </ul> <p>It is not considered necessary to amend this principle. The inclusion of ‘market gardens’ is considered appropriate, as these are a significant built environment feature of the floodplain.</p> <p>However, it is recommended that the following principle be added:</p> <ul style="list-style-type: none"> <li>• <u>Improve connectivity between nature reserves, forested Crown land, remnant patches of native vegetation and waterways.</u></li> </ul>

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			<p><u>UGF Part 4 - Element 1 Environment – Key Issues:</u></p> <p>Habitat values:</p> <p>Inadequate description of values –Once the values are adequately described then there is a need to list ways to protect them. It must be an issue if habitat is threatened by housing! What tactic will be used to protect the habitat values of Long Forest Nature Conservation Reserve. Given that this is a Parks Victoria managed reserve that protects such threatened habitat, how can this plan add to its protection? List things like providing a buffer/interface on the boundary to reduce the negative effects of growing urbanisation. Note that there is an existing Environmental Significance Overlay around some of the boundary. List that this ESO should be expanded and strengthened. Habitat and cultural values under the control of the Moorabool Shire planning scheme should be listed. Volcanic Plains Grassland is but one of these! For example, the Framework should also list other threatened plant and animal (flora and fauna) communities such as Rocky Chenopod Woodland Community, Escarpment Scrubland community and The Temperate Woodland Bird Community (all listed communities and present in this area).</p> <p>Cultural and geological heritage:</p> <p>Cultural and geological heritage to be protected not just by improved management (by the Shire?) and by restricting public access but also by protecting these sites from destruction by development. There is also need to identify these sites and to protect them with strong controls.</p>	<p><u>UGF Part 4 - Element 1 Environment – Key Issues:</u></p> <p>Habitat values:</p> <p>It is recommended that the following text be added after the commentary relating to Long Forest Nature Conservation Reserve:</p> <p><u>“The Lerderderg State Park, to the north of Bacchus Marsh, contains a range of vegetation types, including a riparian Blue Gum and Manna Gum community of State significance and 23 significant plant species, together with nine significant animal species.”</u></p> <p>Refer to commentary below, in response to the suggested need to provide buffers at the interface of significant biodiversity assets.</p> <p>It is not considered necessary to list habitat and cultural values under the control of the Moorabool Planning Scheme. Future detailed technical assessments will need to be undertaken, to identify biodiversity and cultural heritage values within each of the identified growth precincts. Such assessments (amongst others) are a standard requirement of urban growth planning, and will be used to inform precinct structure plans or development plans for each of the growth precincts.</p> <p>Cultural and geological heritage:</p> <p>As discussed above, it is not considered necessary to identify cultural heritage values at this point. Future detailed technical assessments will need to be undertaken to identify cultural heritage values within each of the identified growth precincts. Such assessments will be used to inform precinct structure plans or development plans for each of the growth precincts.</p>

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			<p>The Framework does not say what action is to be taken to protect these! For example the document identifies Watersheds and Landscape as ‘...one of the most striking features of Bacchus Marsh...’ but fails to list one action to protect these! These actions should be listed.</p> <p>Plan 3 - Map of Natural Features and Open Space fails to identify Open Space to be protected. Here is an opportunity to put in place the protection of the natural environment that is supposed to make Bacchus marsh so unique. Yet this map hints at Open Space Links that are not mentioned in the text, have potential but are inadequate. There needs to be a description of the vision and controls for these Open Space Links. Adding to these and putting into the planning scheme a coherent way to achieve the protection of these bio-links and flyways is a way of adding to sustainability, protecting biodiversity and keeping the unique features of Bacchus Marsh!</p> <p>Plan 4 – Physical Constraints. This map does not show many physical constraints. For example, the escarpments, Environmental Sensitive Overlay ESO3 around Merrimu and Long Forest etc.</p>	<p>The precinct structure plans will identify appropriate future planning controls to protect significant features.</p> <p>It is recommended that the precinct structure planning principles be amended to ensure that identified natural features will be protected (see discussion below).</p> <p>Natural features and open space:</p> <p>The purpose of Plan 3 is to identify existing natural features, reserves and public open space, and to identify future opportunities for open space links. It is recommended that the UGF be amended to better articulate this purpose.</p> <p>The Moorabool Planning Scheme already contains a number of Environmental Significance Overlays (ESO), aimed at protecting environmental values, such as ESO2 (Waterway protection), ESO3 (Long Forest and Werribee Gorge) and ESO4 (Wetland areas).</p> <p>It is recommended that the precinct structure planning principles be amended to ensure that opportunities for bio-links are identified and considered, to improve connectivity between nature reserves, remnant patches of native vegetation and waterways. (see discussion below).</p> <p>Plan 4 – Physical Constraints: It is recommended that this plan be amended to show escarpments as a physical constraint.</p> <p>ESO3 is not a physical constraint; rather, it is a planning control aimed at protecting the environmental values of Long Forest and Werribee Gorge. Future PSPs will need to address any existing ESOs, or identify alternative planning controls to provide protection of identified environmental values.</p>

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			<p>Environment Objectives: Support for Environment Objectives but add 'Protect waterway corridors to ensure their function and biodiversity are not negatively impacted by any development and seek to add strategic open space to wildlife corridors that strengthen biodiversity.'</p> <p>Environment Strategies: Water Management – ensure that planning buffers waterways and protects biodiversity etc.</p> <p>Biodiversity, heritage and open space - Support for Open Space Strategy and planning for connected open space in planning. Connectivity between Reserves to be maintained not only for recreation but for biodiversity. Seek strategic supplement to open space. Preserve escarpments supported. Ensure that these are included in open space planning. Also plan for their restoration with indigenous vegetation. Support for protection of aboriginal and other heritage in Bacchus Marsh.</p>	<p>Environment Objectives: It is recommended that the second objective be amended as follows:</p> <ul style="list-style-type: none"> <li>Protect waterway corridors to ensure their function and biodiversity are not negatively impacted by any development, <u>and seek to add strategic open space to improve wildlife corridors.</u></li> </ul> <p>Environment Strategies: Water management:</p> <p>The UGF already includes the following strategy which is considered to address the submitter's concerns:</p> <ul style="list-style-type: none"> <li>Ensure new development positively addresses sensitive waterways, and ensure their function and biodiversity are not negatively impacted by any development.</li> </ul> <p>It is not considered necessary to amend the water management strategies as suggested in this submission beyond some clearer principles and actions on integrated water management to inform future PSPs.</p> <p>Biodiversity, heritage and open space (P.35):</p> <p>It is recommended that the second strategy be amended as follows:</p> <ul style="list-style-type: none"> <li>Facilitate <del>recreational access and connectivity to</del> <u>between nature reserves and parks (e.g. Lerderderg State Park, Werribee Gorge and Long Forest Nature Conservation Reserve) and waterways</u> in order to retain and enhance <u>biodiversity these ecosystems, and facilitate appropriate recreational access and public enjoyment of them.</u></li> </ul>

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			<p>Support for protection of Bacchus Marsh heritage. Advocate for heritage overlays for valued street scapes. Support for including other heritage assets in heritage overlays.</p> <p>Seek further protection for remnant indigenous plant communities. Take action on the mapping assessment of remnant vegetation already completed by the shire and include these in ESOs.</p> <p>Support for protection of Bacchus Marsh Irrigation District. This is a very important feature of the look of the valley and deserves planning protection.</p> <p><u>UGF Part 4 - Element 2 – Employment:</u></p> <p>Plan 5. Employment: Support for protection of the Bacchus Marsh Irrigation District against subdivision and preservation for</p>	<p>The UGF already includes the following strategy relating to escarpments:</p> <ul style="list-style-type: none"> <li>• Preserve escarpments that define the edges of Bacchus Marsh Valley and plateaus.</li> </ul> <p>It is not considered necessary to amend this strategy to ensure that escarpments are included in open space planning, nor to plan for their restoration with indigenous vegetation. The UGF (Table 3; Key growth actions – state/regional) identifies the need for a District Open Space Framework to be prepared in the short term. This framework will determine future open space needs, which may or may not include some escarpment areas. The ultimate management of escarpments will need to be determined via future precinct structure plans or development plans.</p> <p>The UGF already includes the following strategy relating to heritage:</p> <ul style="list-style-type: none"> <li>• “Ensure other heritage assets in Bacchus Marsh are protected and included within Heritage Overlays under the Moorabool Planning Scheme.”</li> </ul> <p>It is not considered necessary to amend this strategy. The UGF (Table 4; Key growth actions - local) identifies the need to update the heritage study for Bacchus Marsh (including geo-heritage management) in the medium term. An updated heritage study would identify ‘heritage places’ which could include individual properties/features or heritage precincts.</p> <p><u>UGF Part 4 - Element 2 – Employment:</u></p> <p>The Maddingley Brown Coal site includes an inert-waste landfill and composting facility, of State and regional significance. It is understood that the brown coal extracted</p>



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			<p>employment opportunities, tourism and gateway landscape.</p> <p>Opposed to coal mining in Bacchus Marsh for use as a burning fuel for industry or power generation. Support for provision of appropriate higher education and training facilities in particular for technology based post-secondary education.</p> <p>Need for north-south truck route joining retail, light industrial, agricultural and service industry to freeway and rail. Present damaging truck route from Woolpack Road into, along and out of the Avenue of Honour. As trucks get heavier and more numerous there will be a need for Woolpack Road to be extended north to the freeway, simply crossing the Avenue of Honour rather than driving along it. This option would do less damage the Avenue in the long term!</p> <p>Opposed to the plan to advocate for the consolidation of Bacchus Marsh Grammar and Bacchus Marsh College. (Page 44) The town will continue to need a well-funded state owned and run secondary college.</p> <p>An existing traffic problem in the secondary education area of Bacchus Marsh is the intersection of Grant Street, Parwan Road, the railway crossing in Grant Street and the turn into South Maddingley Road to Wilson's Hardware and Bacchus Marsh Grammar. Here, traffic congestion can be severe and dangerous with turning traffic meeting through traffic, railway train movements and regular boom gate closures. This plan should identify the need to find a solution!</p> <p>The development of a north/south heavy transport road or network should precede the implementation of</p>	<p>from the site is not used for thermal purposes. Mining is regulated by State agencies including DEDJTR and the EPA, under legislation such as the <i>Mineral Resources (Sustainable Development) Act 1990</i> and the <i>Environment Protection Act 1970</i>.</p> <p>In relation to education, the UGF (on P.44) includes strategy to:</p> <ul style="list-style-type: none"> <li>• “Plan (parking, access, facilities) and advocate for the consolidation of Bacchus Marsh Grammar School and Bacchus Marsh College.”</li> </ul> <p>It seems that the submitter may have misinterpreted this strategy as meaning the full consolidation of these two schools, however, this is not the intention. It is recommended that the strategy be amended as follows, to more clearly articulate the intention:</p> <ul style="list-style-type: none"> <li>• Plan (<del>parking, access, facilities</del>) and advocate for the consolidation of <u>facilities, parking and access between Bacchus Marsh Grammar School and Bacchus Marsh College.</u></li> </ul> <p>It is acknowledged that there is an existing traffic congestion issue in the vicinity of the railway crossing in Grant Street. The UGF (Table 3; Key growth actions – state/regional) identifies the need for a Maddingley integrated college precinct planning/access study to be prepared in the short to medium term. As per the title, access will be a key consideration of this study.</p> <p>However, the broader issue of traffic congestion along Grant Street and Parwan Road near the railway crossing is more a matter for the Bacchus Marsh Integrated Transport Strategy (BMITS; adopted by Council on 21/12/2015) to deal with.</p>

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			<p>development of industries requiring multiple transport movements such as the bulky goods precinct. As stated elsewhere this should not be at the expense of the identified biodiversity values.</p> <p><u>UGF Part 4 - Element 3 – Housing &amp; Community Infrastructure:</u></p> <p>Support for the concept of clear controls to protect neighbourhood character. (page 47)</p> <p>Provisions intended to protect neighbourhood character must be clear enough to be defensible! For example, a clear policy of how communal open space, personal open space and landscaping is to be provided in all dwelling developments. In the present planning scheme Clauses 54 and 55 provisions need to be made clearer and should mandate a failure of a permit application that does not comply.</p> <p>In the context of neighbourhood character, protective neighbourhood heritage overlays and streetscape overlays should be used to help preserve heritage, landscape and architectural values and themes. For example, Lerderberg Street, the Joseph Taylor designed and built cottages in Graham Street. This is especially important where individual dwellings may not rate heritage protection but a collection of houses in a street may represent a period or series of architectural styles.</p>	<p>Grade separation of the railway line at Grant Street is listed as a long term priority under action number 9.3 of BMITS.</p> <p><u>UGF Part 4 - Element 3 – Housing &amp; Community Infrastructure:</u></p> <p>Neighbourhood character:</p> <p>The UGF identifies neighbourhood character as a key issue and correctly notes that this issue will be addressed via Amendment C79, which is running concurrently with C81. Amendment C79 seeks to implement the Bacchus Marsh Housing Strategy, via updates to the MSS, rezoning of some land and the application of new schedules to the residential zones. The new schedules will vary some of the Clause 54 and 55 standards where considered appropriate.</p> <p>Council cannot alter the wording of Clauses 54 and 55 to make them clearer, as these clauses form part of the state-wide standard Victorian Planning Provisions. Similarly, Council cannot vary the way that permit applications are considered.</p> <p>In response to the submitter's comments about heritage overlays (as per discussion above):</p> <p>The UGF (Table 4; Key growth actions - local) identifies the need to update the heritage study for Bacchus Marsh (including geo-heritage management) in the medium term. An updated heritage study would identify 'heritage places' which could include individual properties/features or heritage precincts.</p>

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			<p>Community Facilities and Education – Existing urban area community needs:</p> <p>The point about the need for a large function centre is a complete point. It is assumed that the reference to the ‘...particular larger educational institutions.’ (page 53), is intended to refer to the need for tertiary education facilities! Does size matter? This should be a separate point and should be clarified.</p> <p>Plan 6 – Housing and Community:</p> <p>Maps need to be redrawn to show protection of the escarpment, biolinks etc not bend to a demand from potential developers, especially Merrimu, Parwan and Hopetoun Park North where the potential for housing is mapped as below the escarpment areas.</p> <p>See page 54 ‘Open Space and Parks’:</p> <p>Without doubt Open Space and parks are a key issue in preserving and providing for future community needs.</p>	<p>Community Facilities and Education: Existing urban area community needs:</p> <p>The UGF (on P.53) lists the following key issue (amongst others):</p> <ul style="list-style-type: none"> <li>• “Bacchus Marsh currently lacks a large enough function centre to address the needs of the community, and in particular larger educational institutions.”</li> </ul> <p>The submitter has expressed confusion about the meaning of this point. However, it is considered that the meaning is quite clear and that no changes are required. The reference to ‘larger’ educational institutions simply means that there is currently a lack of a large enough function centre to address their needs.</p> <p>Plan 6 – Housing and Community (P.52):</p> <p>The submitter seeks amendments to this plan to show protection of the escarpment, bio-links etc. However, this information is not considered particularly relevant to the Housing and Community plan. The escarpments are shown on UGF Plan 3 (Natural features and open space) and it is recommended that they also be added to Plan 4 (Physical constraints).</p> <p>Proponents for development in each growth precinct will need to undertake future technical investigations (such as environmental values and environmental risks), which will inform the preparation of a PSP or development plan.</p> <p>Open Space and Parks (P.54):</p> <p>The UGF identifies the potential for future open space links, not only along the old irrigation channel reserve, but also along</p>

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			<p>We need to do better than identify the old irrigation channel through the urban area as the only overt strategy for informal and unstructured recreation! We already have parkland managed by Parks Victoria. An important question is - What can this Framework bring to the table to preserve and enhance community open space? The plan should not only identify and preserve space for community sports but should identify and preserve areas for community parkland, linear parks and areas to be protected for their environmental value. The Framework should put in place a clear vision and defensible plan to identify, establish and manage open spaces ahead of permit applications from developers.</p> <p>Accepting the idea that Bacchus Marsh already has ‘...extensive areas of natural open space...’ is a complacency that will lead to inaction in this plan. Long Forest Nature Conservation Reserve is a small reserve where many threatened species and flora and fauna communities at present survive. However, their future is not assured. Increasing urbanisation, climate change and introduced plants and animals threaten their future. Adding to strategic public open space in the Bacchus Marsh area would provide wildlife movement corridors and aid survival. At the same time this space would be an important passive recreation area. Wide streamside reserves, generous escarpment reservations and parkland connecting natural areas should be identified in these strategic plans and incorporated into the planning scheme.</p> <p>Areas with species and communities listed as ‘endangered’ or ‘threatened’ in Commonwealth or Victorian legislation should be identified in planning as protected land. If goals are made clear and planning</p>	<p>waterways such as the Werribee River, Lerderderg River, Korkuperrimul Creek and Goodman Creek. The UGF also identifies the potential for a future open space link between the Long Forest Nature Conservation Reserve and the Merrimu residential growth precinct.</p> <p>Future PSPs and development plans for each of the urban growth precincts will need to identify new open space networks and show how these integrate with existing/proposed networks beyond the precinct. Although this is a standard requirement of PSPs and development plans, it is recommended that the UGF be amended to make this expectation more explicit by adding the following precinct planning principle for each growth precinct:</p> <ul style="list-style-type: none"> <li>• <u>Identify new public open space networks (incorporating environmental values/features, biolinks and cycling/walking trail networks), and show how these integrate with existing/proposed networks beyond the precinct.</u></li> </ul> <p>As discussed above, the UGF (Table 3; Key growth actions – state/regional) identifies the need for a District Open Space Framework to be prepared in the short term. This framework will determine future open space needs for the Bacchus Marsh district.</p> <p>With regard to endangered or threatened species, a range of technical investigations (including flora and fauna, and others) will need to be undertaken, to inform future PSPs and development plans for each of the urban growth precincts. The PSPs and development plans will need to identify and respond to any significant environmental values or risks.</p>

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			<p>was strategic, negotiating beneficial planning outcomes would be possible.</p> <p>Utilities:</p> <p>Provision of utilities such as sewerage, water, energy and communications in new residential areas should be to approved design and provided by the developer. Reduced rainfall, the rain shadow in the area leading to low water yield, years of drought and predicted greater volatility in rainfall, leads to concern about the potential for water resources to provide adequately for predicted population growth.</p> <p>Housing and Community objectives:</p> <p>There is concern that lot consolidation and increasing dwelling density in locations close to services will result in loss of amenity and threaten neighbourhood character. Planning provisions should be strengthened to protect neighbourhood character, amenity and heritage.</p>	<p>Utilities:</p> <p>In accordance with the State government's PSP guidelines, the PSP for each growth precinct will need to include a utilities plan showing the location of existing and proposed physical services infrastructure, together with details of how infrastructure provision will be phased in sequence with development.</p> <p>After a PSP has been approved, any planning permit issued for subdivision or development would include conditions which require the developer to construct physical services infrastructure in accordance with an approved design.</p> <p>Notwithstanding the above, it is recommended that Tables 1 and 3 of the UGF be amended to include the following action: Project:</p> <ul style="list-style-type: none"> <li>• <u>Integrated Infrastructure Delivery Framework for all growth precincts: to demonstrate how infrastructure delivery will be efficiently integrated between the various growth precincts.</u></li> </ul> <p>Timing: Short term. Responsibility: Council/VPA</p> <p>Housing and Community objectives and strategies:</p> <p>The submitter has expressed concerns that infill development will result in loss of amenity and threaten neighbourhood character. These considerations are beyond the scope of Amendment C81 and are more relevant to Amendment C79 which seeks to implement the Bacchus Marsh Housing Strategy.</p>

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			<p>Housing and community strategies: The development of minimum standards for landscaping and street design is supported. Add to this minimum standards for personal open space, neighbourhood open space and site and dwelling amenity objectives and standards.</p> <p><u>UGF Part 4 - Element 4 – Transport:</u></p> <p>Eastern Link Road:</p> <p>Support for sequencing the permits for new growth areas to be subject to prior development of major road infrastructure, especially the building of a north-south heavy duty road, identified here as the ELR. However achieving this goal should not be at the cost of destroying old River Red Gums or major damage to the biodiversity and beauty of the eastern end of the Bacchus Marsh valley.</p>	<p><u>UGF Part 4 - Element 4 – Transport:</u></p> <p>Eastern Link Road:</p> <p>The State government has committed \$3M for a road corridor planning study which will likely take two to three years to complete. This study will identify one or more preferred road alignment options, based upon identified constraints such as environmental values/risks, quality agricultural land, heritage, landholdings, etc.</p> <p>The delivery of this road is fundamental to the success of future growth, particularly the potential PEP, and Merrimu and Parwan Station growth precincts. However, some development could potentially occur within the growth precincts prior to the construction of the ELR, subject to the provision of upgrades to the local road network.</p> <p>It is therefore recommended that the UGF and exhibited MSS clauses be amended to include a short term action to undertake traffic modelling to identify the maximum number of lots which can be developed in each growth precinct prior to the ELR being constructed, and the local road network improvements necessary to facilitate such development.</p> <p>Also, the precinct planning principles in the UGF should be amended, to require that PSPs for Parwan Station and</p>

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			<p>Walking and cycling:</p> <p>Support for the provision of fully integrated walking and cycling networks to provide access in new suburbs and to connect community facilities. This should extend to existing neighbourhoods where possible. This requirement should be included into the planning scheme and required as part of any development application.</p> <p><u>Growth areas and Constraints:</u></p> <p>Both physical and land use constraints have been identified for the target growth areas listed in the Framework. However many of these constraints have been ignored in the mapping of the boundaries of these target growth areas. For example under physical constraints both 'steep topography' and 'sites of natural and built environmental significance' are listed. However in mapping the 'Merrimu Residential Growth Precinct' both steep topography (escarpment) and environmental significance have been ignored as the area east of Bences Road has been included in the area. This area of environmental significance also has some escarpment land. The same is true of both the Hopetoun Park North Residential Growth Precinct and Parwan Station Residential and Commercial Growth Precinct. Here the mapping includes areas of escarpment land. It is also true that if bushfire-prone areas and parks and open space are land use</p>	<p>Merrimu urban growth precincts identify the maximum number of lots which can be developed in each growth precinct prior to the ELR being constructed, and the local road network improvements necessary to facilitate such development.</p> <p>Walking and cycling:</p> <p>The future PSP or development plan for each growth precinct will need to include an integrated transport plan which would include provision for walking and cycling, and connectivity with the existing urban area.</p> <p><u>Growth areas and Constraints:</u></p> <p>It is recommended that Plan 4 'Physical Constraints be amended as follows:</p> <ul style="list-style-type: none"> <li>• Add escarpments;</li> <li>• Add steep topography.</li> </ul> <p>It needs to be emphasised that the future growth precincts are essentially investigation areas. Future PSPs will need to respond to the findings of further detailed technical investigations (e.g. environmental values/risks, heritage values, infrastructure). Future urban zone boundaries will need to respond to any additional constraints identified in the further detailed technical investigations.</p> <p>Escarpment areas can be included in the investigation areas, provided there is a clear precinct planning principle that escarpments are protected. The PSP process will determine actual setbacks from escarpments. There is a risk that excluding escarpments from the investigation areas would</p>

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			<p>constraints then these should be identified prior to any consideration of an area for housing and excluded in planning documents. In other words, they should be non-negotiable!</p> <p>Component 3: Principles for the allocation of growth areas:</p> <p>The nomination of growth areas does not follow logically from the principles listed. For example, the Framework has made much of the difficulty of completing the so called East Link Road. Other principles related to serviceability, transport links and the need to avoid development of hill faces and escarpments are outlined in the allocation of growth areas. These principles suggest that the flat areas south of the existing Bacchus Marsh township would best fit the criteria. Yet the area of Merrimu Residential Growth Precinct, that does not fit</p>	<p>place these areas in 'no man's land' with no resolution of how these areas are managed.</p> <p>Consistent with the response to submission 11, it is recommended that the UGF be amended by adding the following precinct planning principle for Merrimu, Parwan Station and Hopetoun Park North growth precincts:</p> <ul style="list-style-type: none"> <li>• <u>Ensure that development is set back from the top of the escarpment, to minimise landscape and environmental impacts.</u></li> </ul> <p>Notwithstanding the above, it is recommended that the Merrimu future residential growth precinct be amended on Plans 1, 3, 4, 5, 6, 7 and 8, to exclude steep and heavily vegetated land to the east of Bences Road, north of Possumtail Run estate and south of Dodemaide Circuit estate.</p> <p>It is recommended that the area below the escarpment in the north-west be retained within the precinct, as this area provides opportunity for the precinct to connect with the existing urban area to the north of Darley.</p> <p>Component 3: Principles for the allocation of growth areas:</p> <p>There is a clear logic in including Merrimu with Parwan Station as growth investigation areas, on the basis that:</p> <ul style="list-style-type: none"> <li>• Merrimu area already has a number of rural residential type estates within the RCZ.</li> <li>• The existing RCZ requires a minimum lot size of only 0.75 hectares (and an average of 1.0 hectares). Thus, there is scope for some 500 more lots even without rezoning any land; all of which would drastically change the existing landscape/environment.</li> <li>• Except for a portion of the Parwan Station precinct, much of the area to the south of Bacchus Marsh is constrained</li> </ul>



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			<p>the criteria, has been identified. Why? This Precinct has large areas of natural environmental significance (in particular Basalt Plains Grassland), a waterway corridor, escarpment and topography constraints, transport constraints, is a bushfire prone area and is adjacent to Long Forest Nature Conservation Reserve where rare and threatened species survive but could be easily undermined by urban intrusion.</p> <p><u>Merrimu Residential Growth Precinct:</u> Precinct Description:</p>	<p>by amenity buffers required to protect existing land uses, particularly the Bacchus Marsh Recycled Water Plant, Maddingley Brown Coal and associated waste recovery facility which is of State significance.</p> <ul style="list-style-type: none"> <li>• Merrimu and Parwan Station can make significant financial contributions to the ELR because they will need an arterial road connection to the Western Freeway.</li> <li>• There is significant developer interest in the Merrimu, Parwan Station and Hopetoun Park North precincts, which makes it probable that developers/consortiums will directly advocate for urban growth anyway.</li> <li>• The urban growth precincts don't contain any significant agricultural land, and beyond some areas subject to constraints such as biodiversity values, heritage values, or bushfire risk, the growth precincts contain ample available land to leverage from growth to finance needed infrastructure.</li> <li>• The specific concerns expressed are realities in any urban growth area. The PSP and development plan processes will need to respond to such issues. It should be noted that future planning scheme amendments will be required to rezone land and implement any PSPs. Future planning scheme amendments will be publicly exhibited in accordance with the requirements of the <i>Planning and Environment Act 1987</i>.</li> </ul> <p>Notwithstanding the above, it is recommended that the 'Principles for the allocation of growth areas' be amended by adding the following:</p> <ul style="list-style-type: none"> <li>• <u>Protect the Bacchus Marsh Recycled Water Plant and associated buffers, at Parwan.</u></li> </ul> <p><u>Merrimu Residential Growth Precinct:</u> Precinct Description:</p>

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			<p>This text does not describe the precinct but reads more like a developer's sales pitch. The statement that the proposed activity centres within the MRGP will '...also service the Hopetoun Park and Long Forest communities...' is most unlikely when the road access between these areas is examined. Once residents are in their cars it is more likely that they will drive to Bacchus Marsh or Melton.</p> <p>Precinct Planning Principles:</p> <p>Principles dealing with interfaces between development and escarpments and environmental assets only consider views and attractiveness for local residents as important. No mention is made in the planning principles of the importance of, or obligations under Commonwealth and Victorian legislation to protect the natural environment. This is especially true of listed rare and threatened species and communities that are present in this precinct. This is a serious omission!</p> <p>These Precinct Planning Principles provide an opportunity to provide for both public open space for this community and to set aside linier reserves that could be both passive recreational space (walking and bike riding) and bio-links for wildlife. This principle should be added to those listed.</p>	<p>Concerns about the precinct description are a matter of opinion. Merrimu is the largest of the identified investigation areas and could accommodate one or more sizable activity centres, capable of serving the needs of its own residents, as well as those of Long Forest and Hopetoun Park.</p> <p>As discussed previously, any PSP or development plan will need to be supported by an 'integrated transport plan', acceptable to both Council and VicRoads.</p> <p>Precinct Planning Principles:</p> <p>The State government's PSP guidelines require that PSPs must respond to a number of objectives, one of which is to 'respond to climate change and increase environmental sustainability'.</p> <p>However, it is recommended that the ninth precinct planning principle (UGF; page 72) be amended as follows:</p> <ul style="list-style-type: none"> <li>Consider interfaces with environmental assets such as Long Forest Nature Conservation Reserve and BMID, <u>to protect and enhance biodiversity values</u> and <del>aim for</del> <u>achieve</u> attractive development for local residents.</li> </ul> <p>As discussed above, the PSP guidelines require that PSPs must respond to an objective relating to environmental sustainability. The PSP guidelines list a number of strategies for achieving this objective, including: "Areas retained for environmental purposes and Aboriginal and post-contact heritage form part of the open space network, providing for both conservation and recreation needs".</p>

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			<p>Detailed planning considerations:</p> <p>Defining the eastern edge by the Long Forest Nature Conservation Reserve:</p> <p>Considering the 'Environmental Objectives' at E1 and statements about biodiversity, heritage and open space, it is surprising that this plan does not present a stronger vision for the protection of the environment along the eastern edge between the Long Forest Nature Conservation Reserve and Bences Road. In much of this area there are listed communities to be protected. These include Rocky Chenopod Woodland, Plains Grassland and the Temperate Woodland Bird Community. That these should be protected is supported in the statement 'Retain areas of significant vegetation and avoid development in these areas'. However the statements about the road and residential densities and design appear to contradict this! The eastern edge of the precinct needs to be redefined and moved west not only avoiding threatened vegetation but also providing a buffer as proposed in other locations.</p> <p>The current definition of the eastern boundary is unsatisfactory, is drawn below the escarpment in many places, covers threatened and protected vegetation areas and ignores the complexity of the landscape.</p> <p>Defining the northern boundary by Diggers Rest-Coimadai Road:</p>	<p>Also as discussed above, it is recommended that the environmental strategies on page 35 of the UGF be amended to facilitate connectivity between nature conservation reserves.</p> <p>Detailed planning considerations for Merrimu precinct (page 73):</p> <p>Defining the eastern edge by the Long Forest Nature Conservation Reserve:</p> <p>This matter has been previously discussed..</p> <p>It is, however, recommended that the second dot point (page 73) be amended as follows:</p> <ul style="list-style-type: none"> <li>• Ensure residential densities, siting and design respond appropriately to bushfire risk <u>and the principle of protecting and enhancing biodiversity values.</u></li> </ul> <p>As discussed above, the PSP guidelines require that PSPs must respond to an objective relating to environmental sustainability. The PSP guidelines list a number of strategies for achieving this objective, including: "Waterways and ecologically significant areas of native vegetation and other important habitat areas become key community assets".</p> <p>Refer to earlier comments.</p> <p>Define the northern boundary by Diggers Rest-Coimadai Road:</p>

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			<p>As shown on the boundary map, the precinct boundary intersects with the Diggers Rest-Coimadai Road (or Toolern Vale Road) at one point only and that is where Bences Road meets this road on the northern boundary. The remaining northern boundary follows the west side of Bences Road and runs east-west south of Dodemaide Circuit community. The statement related to this boundary ‘...of avoiding back of fence along this road...’ makes no sense. Is this a detailed planning consideration?</p> <p>It appears from the detail presented about the planning of the Merrimu Residential Growth Precinct that the boundaries have been marked to maximise the size of the area without due consideration for many of the constraints already outlined in the Framework. The boundary marking appears to be an attempt to maximise the area of the proposed precinct! Why? The whole area should be redefined with these many constraints taken into account. These include escarpment edges, creek and drainage protection, listed and threatened species protection, need for buffer zones, lack of consideration for pre-established residents, boundary within the LFNCR in some places and lack of protection for the venerable and important conservation role of Long Forest Nature Conservation Reserve.</p>	<p>The UGF lists only one planning consideration for this boundary, being:</p> <ul style="list-style-type: none"> <li>• <i>Apply precinct planning principles of avoiding back of fence along this road.</i></li> </ul> <p>It is conceded that this planning consideration doesn't make much sense, particularly given that the 500m wide buffer interface to the east of Gisborne Road will likely result in any urban zone commencing at least 400m south of Diggers Rest-Coimadai Road.</p> <p>It is recommended that this planning consideration be amended as follows: Define the northern boundary by <u>Bences</u> <del>Diggers Rest-Coimadai</del> Road:</p> <ul style="list-style-type: none"> <li>• Apply precinct planning principles of avoiding back of fences <u>facing onto</u> <del>along</del> this road.</li> </ul> <p>See earlier comments.</p>

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			<p><u>Parwan Employment Growth Precinct:</u></p> <p>In the precinct planning principles the protection of wetlands, especially swamps and remnant native vegetation and landscape amenity is important. The development of an open space network for the area is an important priority.</p> <p><u>Parwan Station Residential &amp; Commercial Growth Precinct:</u></p> <p>The 'Precinct description' does not describe the precinct but describes the development of it!</p> <p>The precinct planning principles are inadequate. Escarpment protection and buffers, protection of threatened species and communities and planning for open space would help ensure some amenity is preserved for the area. These things are at least as important as views from the freeway!</p> <p>In defining the northern boundary it is proposed that a perimeter road "...along the top edge of the escarpment..." be built. This proposal is in shocking</p>	<p><u>Parwan Employment Growth Precinct:</u></p> <p>As discussed above, the PSP guidelines list a number of strategies for achieving the objective relating to environmental sustainability, including: "Waterways and ecologically significant areas of native vegetation and other important habitat areas become key community assets".</p> <p>However, it is recommended that the following precinct planning principle be added to the UGF:</p> <ul style="list-style-type: none"> <li>• <u>Ensure protection and appropriate management of any remnant wetlands with identified habitat values.</u></li> </ul> <p>In some cases, native vegetation offsets will need to be provided to enable development to occur. It should, however, be acknowledged that much of the land is cleared, has a history of agricultural use and is appropriate for an agribusiness precinct.</p> <p><u>Parwan Station Residential &amp; Commercial Growth Precinct:</u></p> <p>Some refinements to p75 would clarify the uses already established, the infrastructure in place as well as that which is not, the environmental values and history of the land.</p> <p>It is recommended that the precinct planning principles be amended as follows:</p> <ul style="list-style-type: none"> <li>• Define the range of <u>land uses that can occur within buffer interface areas.</u></li> <li>• Ensure that buffer interface areas are sufficient.</li> <li>• <u>Locate activity centres based on walkable catchments, with the main activity centre located in close proximity to the future railway station.</u></li> <li>• <u>Consider interfaces between development and escarpments, to ensure views are not lost to and from</u></li> </ul>

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			<p>contradiction of the management of the views from the freeway and Avenue of Honour. It would also be a piece of environmental vandalism! There should be a proposal for a buffer along the edge of the escarpment wide enough to establish a park with open space protecting the Werribee River escarpment edge. Other corridors of open space should be joined to this providing walking tracks and bio-links for wildlife movement. For example, the Werribee River Corridor is a well-documented flyway for bird migration (Hewish et.al 2006).</p> <p><u>Hopetoun Park North Residential Growth Precinct:</u></p> <p>The proposal of this development area contradicts the desire expressed in the Framework to have a green break between Melton and Bacchus Marsh.</p> <p>The precinct planning principles fail to mention the need to protect listed native plant communities in this precinct and the opportunity to provide open space as part of the development.</p>	<p><u>escarpments, and to protect and enhance biodiversity values.</u></p> <ul style="list-style-type: none"> <li>• <u>Ensure that sequencing of Parwan Station precinct protects the existing use rights of the broiler farm at 51 Browns Lane, by identifying an amenity buffer where no sensitive uses will be permitted until such time as the broiler farm use ceases.</u></li> </ul> <p>The provision of a perimeter road at the interface between urban development, public land, waterways or rural land uses is a long established planning principle. The aim is to maximise opportunities for passive surveillance of public land (thus reducing inappropriate activities), maximise public accessibility and enjoyment of public land, provide a buffer for bushfire protection, and provide access for emergency and maintenance vehicles. The issue is not perimeter roads perse, but how far they are set back from escarpment edges and the break of slope. These are issues for consideration during the PSP and development plan process.</p> <p><u>Hopetoun Park North Residential Growth Precinct:</u></p> <p>Disagree. Hopetoun Park North has been an identified proposal for over 10 years or more (e.g. Amendment C34), in various forms. Provided it is contained to the south of the Western Freeway, adequately setback and designed appropriately there are no issues with a green break to Melton. Land immediately to the east of Hopetoun Park North lies within the City of Melton and is zoned Public Use Zone 1, Rural Conservation Zone and Green Wedge A Zone, providing a green break of at least 1.0 kilometre.</p> <p>Land north of the freeway is more critical for the green break as it is more visually exposed and disconnected from the existing Hopetoun Park community. This area is therefore not</p>

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			<p>The proposed perimeter road along the edge of the escarpment is in direct contradiction of both managing gateway views and the responsibility to protect the escarpment environment.</p> <p><u>The Future:</u></p> <p>That the Moorabool Shire have undertaken this draft Urban Growth Framework to direct and shape the growth of the Bacchus Marsh area is to be admired. The Environment Objective that identifies the need to provide ‘...and integrated network of parks, open space and trails to connect residents and visitors with the natural assets of the district...’ is strongly supported. However the vision would benefit by the remnant native Bacchus Marsh environment being included as an important part of these natural assets. The achievement of a network of parks and open spaces should be for the benefit of both residents and as a contribution to sustainability. This includes sustainability of biodiversity for Bacchus Marsh. For this to be achieved, these objectives must be included and spelt out at each stage of, and for each Precinct of the Framework. An integrated network of parks and open spaces could be the great vision that would help retain the character of the town and continue to make Bacchus Marsh a pleasure to live in and a joy for visitors.</p>	<p>of community benefit in addressing neighbourhood planning needs at Hopetoun Park.</p> <p>See earlier comments regarding perimeter roads.</p> <p><u>The Future:</u></p> <p>Overall concur with comments. The issue is the balance between details in the UGF versus the role of PSPs. Where appropriate, refinements have now been made to address specific matters where agreement exists.</p>

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25	N/A  Cement Concrete & Aggregates Australia	Comments only	<p>CCAA is the peak industry body for the heavy construction materials industry in Australia including the cement, pre-mixed concrete and extractive industries. For your information, a list of CCAA Victoria's members is provided in Appendix 1.</p> <p>CCAA members nationally account for 85% of total industry output, which contributes nearly \$12 billion to Gross Domestic Product, employ 18,000 Australians directly and supporting the employment of a further 89,000 people. CCAA members produce and supply the heavy construction materials that are used to construct Victoria's infrastructure. Providing both the raw material and finished product, heavy construction materials contribute to the construction of our roads, railways, bridges, ports, airports, hospitals and schools.</p> <p>CCAA's members service local, regional and national building, construction and infrastructure markets. The reliable and cost-effective supply to these markets is fundamental to sustainable growth and it is CCAA's aim to promote policies that recognise the importance of these materials to Australia's sustainable future.</p> <p>Appropriate land use planning that recognises and protects state significant extractive resources while managing local communities and the environment is a key industry priority. Resources must be protected from incompatible land use as their location is determined by geological conditions, which cannot be changed. Resources must also be located close to their market as transportation is a significant cost of operations.</p> <p>CCAA welcomes the recognition within the Framework document that the Darley sand quarries are a significant</p>	<p>Noted</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>



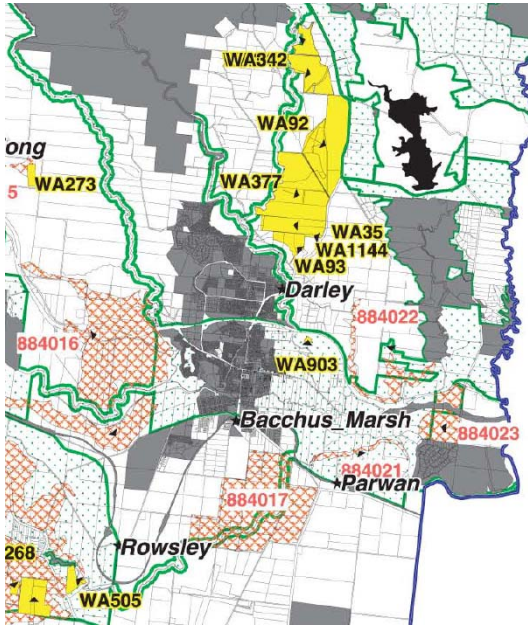
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			<p>sand resource for Melbourne's western growth front and construction industry. CCAA also welcomes the Framework's Employment Objectives and Strategies to protect the valuable sand resource and to provide adequate separation distances to adjacent sensitive land uses.</p> <p>CCAA supports industry to engage with the community and the Department of Economic Development, Jobs, Transport &amp; Resources (DEDJTR) to develop innovative end land uses for the quarries after the sand resources have been fully exhausted.</p> <p>CCAA provides the following additional comments in support of the state significant Darley sand resources:</p> <p><u>Darley Sand Quarry Investigation Area:</u></p> <p>The report <i>Extractive Resources in Victoria: Demand and Supply Study 2015-50 (DEDJTR May 2016)</i> identifies the Inner West, comprising Macedon Ranges &amp; Moorabool as the only major area to supply sand to Melbourne's west. In fact, the vast majority of the Inner West sand is sourced from the Darley Sand Quarry Investigation Area, comprising some 20 per cent of Melbourne's sand supply. The report <i>Extractive Resources in Victoria: Demand and Supply Study 2015-50 (DEDJTR May 2016; p58)</i> also indicates that sand production from the Inner West is identified as a critical area with potential production shortfalls of 21 million tonnes from 2015-2050.</p> <p>CCAA's primary area of concern is the potential sterilization of the significant Darley Sand Quarry</p>	<p>Noted.</p> <p>Noted.</p> <p>Concern noted. As per the response to submission 54 (DEDJTR), the UGF (on Plans 1, 3, 4, 5, 6, 7 and 8) shows a</p>

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			<p>Investigation Area before the resource is fully utilized by encroachment of incompatible land uses. From the east, the proposed Merrimu residential growth precinct poses a risk, with the outlined buffer interface subject to further investigation and is potentially inadequate to protect the resource from encroachment.</p> <p>From the west, there is no identified buffer to the rural residential development and hence, no protection from encroachment, despite a buffer being identified in the Bacchus Marsh Buffer Assessment.</p> <p>There are recent examples such as the Mt Atkinson PSP where encroachment of incompatible land uses has sterilized existing resources in the ground and shortened the life of a proven, established state significant quarry. This situation should not be repeated at Bacchus Marsh.</p>	<p>“buffer interface required for sensitive uses (subject to further investigation)”, which measures 250m from the quarry boundaries. The CCAA has subsequently advised that some of the quarry operators undertake blasting operations in the process of removing overburden material. As such, it is recommended that that the UGF be amended as follows:</p> <ul style="list-style-type: none"> <li>• Amend Plans 1, 3, 4, 5, 6, 7 and 8, to show a clearly delineated 500m wide buffer (no sensitive uses permitted), in accordance with EPA Publication 1518 <i>‘Recommended separation distances for industrial residual air emissions’</i>.</li> <li>• Amend Plans 1, 3, 4, 5, 6, 7 and 8, to show a clearly delineated 500m wide buffer (no sensitive uses permitted) on the western side of the Darley sand quarry investigation area, at the interface with the existing rural residential area. This buffer is already specified in Schedule 14 to the Design and Development Plan Overlay relating to Camerons Road area, however, it is important that it is also shown on the UGF plans for completeness.</li> <li>• Amend the legend on the plans, to remove the words “(subject to further investigation)”.</li> <li>• Emphasise that no sensitive uses are permitted within the buffer areas.</li> <li>• Amend the ‘export-based employment objectives’ (page 42) as follows: <ul style="list-style-type: none"> <li>○ <del>Protect valuable coal and State-significant sand resources at Darley and Coimadai and promote and facilitate appropriate waste and resource recovery infrastructure.</del></li> </ul> </li> <li>• Amend the third employment strategy relating to ‘extractive industries’ (page 43), as follows: <ul style="list-style-type: none"> <li>○ Investigate potential new end uses for quarries when sand resources are depleted, <del>such as recycled water storage and residential</del>, and ensure new end uses are managed at the precinct level to ensure compatibility.</li> </ul> </li> </ul>

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			<p>Transport links both north and south from the Darley Sand Quarry Investigation Area need to allow ready access to heavy vehicles to transport the sand to market. The area should not be impacted by increased congestion from increased light vehicles or be subject to potential heavy vehicle bans. Appropriate transport planning now could help separate the expected increased light vehicle traffic from the expanded residential development from the heavy vehicles.</p> <p>Note that the Darley Sand Quarry Investigation Area should be extended north to cover the granted Work Authority 342 that extends 2 kilometres north of Russells Road, Coimadai.</p> <p><u>Additional costs due to supply from nearest alternative source:</u></p> <p>If sand production from the Darley Sand Quarry Investigation Area was prematurely stopped before the resource was fully utilised due to encroachment of incompatible land uses, the nearest alternative source of sand of suitable quality for the west of Melbourne is uncertain. Significant quantities of sand occur near the You Yangs in Greater Geelong LGA, but of insufficient volume to totally meet the forecast demand. The next closest <b>potential</b> sources in the west are in Surf Coast and Colac - Otway LGAs, some 100 km from the main</p>	<p>Transport is one of the key elements of the UGF. Refer to responses to submissions 2 and 44. As per the response to submission 44, it is recommended that the PSPs for Merrimu and Parwan Station growth precincts should identify the maximum number of lots which can be developed in each growth precinct prior to the ELR being constructed, and the local road network improvements necessary to facilitate such development.</p> <p>Russells Road forms the northern boundary of the Bacchus Marsh District, for the purpose of the UGF. It is not considered desirable to amend the UGF maps to include Work Authority 342 within the Bacchus Marsh District. However, it is recommended that the UGF text and plans be amended to:</p> <ul style="list-style-type: none"> <li>• Note that the sand resources extend to the north (Work Authority 342); and</li> <li>• Ensure that the future Darley Sand Quarries Investigation includes consideration of future land use options for Work Authority 342.</li> </ul> <p>Noted. See above.</p>

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			<p>west of Melbourne market, involving an additional 70 km transport compared to the Darley sand resource. The next closest alternative <b>proven</b> sand resources occur at Seymour (an additional 75 km, but this resource is also under pressure of sterilisation due to a 'no quarries in flood plain' attitude of the local Catchment Management Authorities), Cranbourne/ Langwarrin (an additional 35 km), Lang Lang (an additional 90 km) or Grantville (an additional 100 km). All of these alternatives involve transporting millions of tonnes of material <b>across</b> Melbourne, increasing traffic congestion, reducing productivity and increasing the costs of material, leading to an increased cost of infrastructure.</p> <p>The Demand Supply report also states that there is an extra \$2 billion in additional transport costs incurred for every extra 25 kilometres that quarry resources must be transported from quarry gate to where the materials are used, over the period 2015-50. As heavy construction materials make on average 32% of the cost of infrastructure projects, the huge increase in the cost of transporting sand from these more distant alternative sources will contribute to an increase in the cost of infrastructure. Such increases, for example could add an extra \$1.3 billion to the cost of the \$11 billion Metro Tunnel.</p> <p>The <b>Extractive Industry Interest Areas</b> (EIAs), as identified via the DEDJTR online mapping tool GeoVic (<a href="http://er-info.dpi.vic.gov.au/sd_weave/registered.htm">http://er-info.dpi.vic.gov.au/sd_weave/registered.htm</a>), overlap the proposed Parwan Station, Hopetoun Park North and the south part of Merrimu. They contain potential resources rather than proven resources</p>	<p>Noted.</p> <p>Noted.</p>

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			<p>capable of supplying proven product to established markets.</p> <p>CCAA <b>does not</b> object to these potential resource areas being sterilised so long as the sand resource in the Darley Sand Quarry Investigation Area is allowed to be fully utilised.</p> <p>These EIAs include:</p> <ul style="list-style-type: none"> <li>• Extractive Industry Interest Area 884017 - includes the Maddingley Brown Coal Mine and landfill (<a href="http://www.maddingleybrowncoal.com.au/">http://www.maddingleybrowncoal.com.au/</a>). Area included as an EIIA to include the potential of basalt overburden that could be extracted to access the coal underneath. This opportunity is also dependent on the demand for coal. Additional basalt resources are currently available elsewhere.</li> <li>• Extractive Industry Interest Area 884021 - includes potential sand deposits. No existing Work Authorities. Limited potential for significant sand operations.</li> <li>• Extractive Industry Interest Area 884022 - includes potential sand deposits. No existing Work Authorities. Limited potential for significant sand operations.</li> </ul>	<p>Noted.</p> <p>Refer to Extractive Industry Interest Areas (EIIA) map in Figure 10 below.</p> <p>The Maddingley Waste Recovery and Recycling Hub has been discussed elsewhere, in response to submissions 7, 13, 15, 21 and 54. As per the response to submission 7, the buffer interface area shown on the UGF plans, and the UGF plan in the exhibited MSS Clause 21.07, extends 2.0 kms to the east of the existing composting operations area approved under EPA Licence 45288 (as amended on 22/11/2017). The buffer required for coal mining is 1.0 km, as per EPA Publication 1518 (<i>'Recommended separation distances for industrial residual air emissions'</i>), which sits well within the buffer interface area shown on the UGF plans.</p> <p>EIIA 884021 coincides with Parwan Creek and lies immediately to the north of the Parwan Station growth precinct. The limited potential for significant sand operations is noted.</p> <p>EIIA 884022 coincides with tributaries of the Werribee River and a section of escarpment. This EIIA lies adjacent to, and partially within, the southern portion of the Merrimu growth precinct. The limited potential for significant sand operations is noted.</p>

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			<ul style="list-style-type: none"> <li>Extractive Industry Interest Area 884023 - includes potential sand deposits. No existing Work Authorities. Limited potential for significant sand operations.</li> </ul> <p>Victoria's planning environment needs to be internationally competitive to continue to attract capital to invest into Victoria to ensure a sustainable and competitive heavy construction materials industry. This in turn facilitates Victoria's improved productivity, housing affordability and lower infrastructure costs.</p>	<p>EIIA 884023 lies adjacent to, and partially within, the western portion of the Hopetoun Park North growth precinct. The limited potential for significant sand operations is noted. However, as per the response to submission 54 (DEDJTR-ERR), it is recommended that that the UGF be amended to include the following additional precinct planning principle, under the heading "Define the northern edge":</p> <ul style="list-style-type: none"> <li>Investigate the extractive industry potential of the sand and gravel resources located within Extractive Industry Interest Area 884023 to the north of the Western Freeway, in consultation with the Resources Division of DEDJTR, and establish an appropriate non-sensitive use buffer to protect the resources.</li> </ul>  <p><b>Figure 10:</b> Extractive Industry Interest Areas.</p>

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26	N/A Western Water	Comments only	<p>Western Water has a keen interest in understanding the potential growth areas within the Urban Growth Framework. Generally Western Water looks up to 50 years into the future to provide servicing solutions for an area.</p> <p>To adequately plan for servicing the population of Bacchus Marsh, Western Water is looking towards the Moorabool Shire Council to provide guidance on size, timing and location of future growth. Servicing solutions for Bacchus Marsh may change depending on these factors and so understanding these variables are key to providing a sustainable and long term solution to the servicing needs of Bacchus Marsh.</p> <p>Western Water is interested in gaining information of the areas of land likely to be developed and the timeframe to go from this framework plan to development on the ground. This will help Western to build in a staging plan for the delivery of infrastructure as well as augmentations to plants and water supplies.</p> <p>Western Water's current water servicing solution for Bacchus Marsh is that it is being fed from Merrimu Reservoir with minimal demand from the Melbourne Water system. As Bacchus Marsh grows and the demand for water increases, Western Water will need to pursue alternative sources of water. To quantify how much additional water will be required to service the area, Western Water will need to get good information on the likely ultimate demand to adequately plan for a future supply to Bacchus Marsh.</p>	<p>Council met with Western Water during the preparation of the UGF and has subsequently provided further information on indicative population numbers for the growth investigation areas.</p> <p>The investigation areas require considerable further work (including background studies) prior to the preparation of PSPs or development plans, which will affect ultimate urban zone boundaries, layout and lot yield. Spatial Economics has recently been commissioned to work with the VPA, to refine population projections for the investigation areas. That information will be forwarded to Western Water shortly.</p> <p>See above comments. Spatial Economics' work will include indicative preferred staging of development, direction of growth and assumptions on timing of lot production. It will, however, be indicative only and will need ongoing updates as information changes and PSPs begin to be prepared.</p> <p>See above.</p>

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			<p>Western Water will need to carry out investigations on the likely impact upon the recycled water plant in Parwan. The additional growth is likely to place pressure on the plant to grow – through capacity upgrades which may require more land. It will require Western Water to find additional users for the treated recycled water. As such Western Water will be interested in finding additional recycled water users within the Parwan Employment Growth Precinct.</p> <p>If not managed properly, the growth will have a significant impact upon the sewer network. Presently, all sewer flows are sent to the Avenue of Honour sewer pump station. Soon some of these flows will be diverted through a pump station on Grant St, near Werribee River. Future growth may overload both pump stations and careful planning will be required to minimise the chance of this scenario from happening.</p> <p>Western Water will be very interested in understanding the arterial road network. To cater for growth major trunk infrastructure will be required. Generally, this infrastructure is built within large road reserves. On some occasions the infrastructure is designed based on the road layout and so getting an understanding of this helps in planning our infrastructure layouts.</p>	<p>Council has been working in partnership with Western Water on the Western Irrigation Network (WIN) project, to examine re-use options for recycled water, potential customers and land use needs. This is an ongoing project that is acknowledged in Table 4 of the UGF (project 20, page 87).</p> <p>Noted.</p> <p>A copy of the Bacchus Marsh Integrated Transport Strategy (BMITS) has been provided to Western Water. The VPA has recently commissioned consultants to undertake additional traffic modelling, to determine the maximum lot yield that could be accommodated in the Merrimu and Parwan Station growth precincts prior to construction of the ELR, and the local road network improvements that would be necessary to facilitate such development.</p> <p>The future PSP and development plan process for each growth precinct will involve the preparation of an integrated transport plan. Western Water will be consulted as part of that process.</p>



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			<p><u>Bacchus Marsh Recycled Water Plant:</u></p> <p>The Bacchus Marsh Urban Growth Framework (BMUGF) background report refers to the Parwan Wastewater Treatment Plant. This treatment plant is now known as the Bacchus Marsh Recycled Water Plant (RWP).</p> <p>The Bacchus Marsh RWP treats sewage to a standard that is acceptable for re-use for recreation and farming activities. The ongoing operation of the Bacchus Marsh RWP is critical for maintaining public health and for protection of the environment. Western Water is looking at maintaining the Bacchus Marsh RWP within the existing site and expanding it as appropriate to service the future growth of the shire. To facilitate this, Western Water needs to get an appreciation to the size of land that will be impacted by the day to day operations, otherwise known as the buffer zone. Land within the buffer zone can still be developed, if it meets the EPA guidelines for developing close to recycled water plants (otherwise known as non-sensitive uses).</p> <p>To determine the buffer zone, Western Water is about to commence an odour dispersion modelling project. This will determine the extent of the land that will be impacted by the operations of the Bacchus Marsh RWP. It is intended to provide clarity for landowners and</p>	<p>It is recommended that the UGF plans be amended to reference the new name of the plant.</p> <p>Noted. The UGF plans show a buffer interface of 1.4 kms between the Bacchus Marsh RWP and the Parwan Station growth precinct, in recognition of the importance of the plant.</p> <p>As per the response to submissions 7, 13 and 17, the intention is that no sensitive uses will be allowed within buffer interface areas. Intensive agricultural uses and polluting industrial uses should also be prohibited within buffer interface areas. Only appropriate uses without potential for adverse amenity impacts (i.e. uses not listed under VPP Clause 52.10) should be allowed to establish within these areas.</p> <p>It is recommended that the UGF (including the relevant plans) and the exhibited MSS clauses be amended, to clarify this.</p> <p>Council is currently working in partnership with the VPA and RDV to prepare a business case and planning study for the PEP, including consideration of infrastructure needs for the precinct. Western Water is a member of the PEP project control group and has been attending most meetings.</p> <p>Council officers have met with Western Water to discuss the odour dispersion modelling project. In principle, an ESO control would be appropriate at the Bacchus Marsh RWP, similar to that used for the treatment plant at Ballan.</p>

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			<p>Western Water alike and enable future planning for appropriate uses.</p> <p>Once the modelling exercise has been completed, Western Water intends to begin a planning scheme amendment process to create an Environmental Significant Overlay (ESO) over the buffer zone.</p> <p>Western Water looks forward to working more with the Moorabool Shire Council in delivering on these amendments to the planning scheme.</p>	<p>As per the response to submission 20, a 1.4 km buffer is considered the absolute minimum buffer required to meet EPA requirements, based upon the current treatment plant operations. The Pacific Environment odour study (<i>Bacchus Marsh UGF – Bacchus Marsh Odour Assessment, 2017</i>) concluded that technology improvements (mechanical treatment) at the RWP would enable the facility to service a future population of 60,000 people with smaller odour footprint than the current treatment plant. Some financial commitment will be required from the proponents of Parwan Station precinct, to support upgrades to the RWP, balanced against Western Water not relying extensively on privately owned land for buffers.</p> <p>It is recommended that the precinct planning principles for Parwan Station precinct in the UGF be amended as follows:</p> <ul style="list-style-type: none"> <li>• <u>Ensure that land zoned for sensitive uses is located beyond the buffer distance to Bacchus Marsh RWP as determined in Western Water's odour dispersion modelling project; or work with Western Water to deliver treatment plant upgrades to facilitate a reduced buffer distance. Any reduced buffer distance must be at least 1.4 kms and will be subject to the proponents committing to a substantial financial contribution towards treatment plant upgrades.</u></li> </ul>

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27	PN 607300, Ballan Road, Balliang East	Comments only	<p>The submitter has committed substantial funding to develop and expand its Australian agricultural and land development investments. The submitter owns substantial land holdings in Melbourne's west, comprising the vast Woodhouse Station site and adjoining Nerowie Farm (a combined total area of approximately 6,100ha). The submitter also recently acquired land within the existing Eynesbury Township (approximately 220ha in size). A permit application is currently with Melton City Council to develop over 800 lots at this site. Part of the Woodhouse Station site, approximately 160ha of relatively unconstrained land, is located within the Moorabool Shire. As a significant land owner on Moorabool's eastern flank, the submitter is particularly interested in the progress of the Council and VPA collaborative planning process for the Bacchus Marsh UGF embodied in Amendment C81.</p> <p>In respect to the recent jointly prepared UGF, the submitter is generally supportive of the proposed amendment.</p> <p>The submitter is currently investigating a range of appropriate uses for the significant land holdings surrounding the Eynesbury Township. The submitter's focus is on recognising the unique attributes of Woodhouse Station in a strategic, historical and ecological sense, this includes a key focus on the sensitive management of native grasslands.</p> <p>The submitter would appreciate the opportunity to participate in this planning scheme amendment process and would like to be considered as part of any future discussions. If a Planning Panel is appointed, the submitter is likely to have significantly advanced</p>	<p>Most of the land referred to is located within the municipality of the City of Melton. Eynesbury is within the Mixed Use Zone and is located approximately 7.3 kilometres south-east of the Parwan Station growth precinct. Land surrounding Eynesbury is mostly within the Green Wedge Zone, except for a small area to the north which is within the Rural Conservation Zone.</p> <p>The submission also refers to approximately 160ha of land located within Moorabool Shire. It appears that the land referred to is part of property number 607300 which is located to the south of Springhill Road and north of Ballan Road, Balliang East. This land is within the Farming Zone and is located approximately 7.6 kilometres south of the Parwan Station growth precinct.</p>

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			<p>planning for Woodhouse Station. The submitter would like the opportunity to expand upon its submission at this point.</p> <p>Regarding the preparation of the draft Bacchus Marsh Draft Urban Growth Framework, the following comments are made:</p> <ol style="list-style-type: none"> <li>1. The submitter is generally supportive of the proposed amendment and its vision for Bacchus Marsh to accommodate growth as a regional settlement rather than a physical extension of Melbourne. The framework successfully highlights the increasing pressure on the current urban growth boundary and offers one logical 'release valve' option within the western corridor.</li> <li>2. Ongoing investigation and planning is required to identify further options within this corridor to contribute to the wider metropolitan and regional growth strategy. The submitter has an immediate interest in terms of strategic planning in this area as a result of its Eynesbury Township holdings. The submitter has also recently appointed a consulting team to explore options for Woodhouse Station. The submitter is therefore committed to participating in strategic planning processes in this region.</li> <li>3. The 'Parwan Residential' area identified to the south of the study area is highly constrained by existing incompatible land uses including chicken broiler farms, the old quarry (used for motor sports &amp; zoned CDZ) and Western Water's Parwan treatment plant. The submitter believes the</li> </ol>	<p>Noted.</p> <p>Disagree. The UGF identifies urban growth opportunities which will cater for the forecast growth of the Bacchus Marsh district to 2041 and beyond. Further options for urban growth are not required.</p> <p>Disagree. The Parwan Station growth precinct provides an opportunity for transit-oriented development, serviced by a future railway station. There is potential to provide a future bus network linking the Merrimu growth precinct to a future Parwan railway station, via the future ELR.</p>

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			<p>anticipated lot yield is therefore ambitious and the prospect of locating a rail station where shown may not be the best investment of public money.</p> <p>4. Locating a rail station further east, at the junction of Telephone Road, is considered a far better option than reviving Parwan station. Advantages of this location include:</p> <ul style="list-style-type: none"> <li>• The station would be roughly equidistant between the growth areas of Bacchus Marsh, Eynesbury Township and Melton South;</li> <li>• The station would service a much larger and diverse catchment, much of which already exists and is in desperate need for critical services and infrastructure such as this; and</li> <li>• The station would result in slightly longer travel for Bacchus Marsh park &amp; ride commuters, however it would present an option for Melton South commuters to back-track when Melton South / Toolern Stations are inevitably at capacity.</li> </ul> <p>5. To secure the opportunity of a strategically located rail station for the benefit of this region, the submitter is open to exploring north/south connection options through its Woodhouse Station land holdings. The submitter has a key organisational focus on the sensitive management of native grasslands and would look to secure a connection which is not highly constrained.</p>	<p>TfVs submission (see submission No. 44) states that “While Bacchus Marsh Railway Station will adequately service residents of Bacchus Marsh for a significant period of time, TfV supports investigating the potential for a station at Parwan in the long term”.</p> <p>Disagree. Telephone Road is located approximately 3.2 kilometres east of the within the Parwan Station growth precinct, within the Green Wedge Zone in the City of Melton.</p> <p>It is unclear what is meant by this comment. As discussed above, a future Parwan railway station located within the Parwan Station growth precinct provides an opportunity for transit-oriented development, with potential to provide a future bus network linking to the Merrimu growth precinct.</p>

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28	239 Parwan-Exford Road and 65 Parwan South Road, Parwan	Supports amendment subject to changes	<p>We act for the landowners of 239 Parwan-Exford Road, Parwan and 65 Parwan South Road, Parwan. 239 Parwan-Exford Road is located within both the Parwan Station Precinct and the Parwan Employment Precinct (PEP) and 65 Parwan South Road is located wholly within the PEP.</p> <p>The heart of the Parwan Station Precinct will be the future Parwan train station around which a commercial neighbourhood shopping centre and higher density residential development will locate. It is of paramount importance that the maximum possible amount of residential land and density is provided in close proximity to the future Parwan station to maximise its potential in servicing the public transport needs of the future community. Additionally, it is imperative that the delivery of the train station be provided as early as possible to drive the commercial activity in the area and service the residential development.</p> <p>Generally, we are supportive of the UGF, Amendment C81 and all supporting documentation. However, we believe that there are some minor changes to the exhibited UGF and the planning scheme amendment documents that will improve the implementation of the UGF.</p> <p><u>Proposed changes to the Bacchus Marsh Urban Growth Framework Plan:</u> The <i>Bacchus Marsh Integrated Transport Strategy (2015)</i> identified the need for key infrastructure such as the ELR and the UGF Background Report also notes that this road project has been 'flagged' within the planning scheme for the past 10 years. Furthermore, the Economic Development Strategy (2015) provided a</p>	<p>Noted.</p> <p>Agreed. Whilst there is an imperative to maximise available land at Parwan Station for urban growth, this needs to be balanced against appropriate buffers to the Bacchus Marsh Recycled Water Plant, the Maddingley WRR Hub and other local industries. See EPA submission (17).</p> <p>Timing of train station delivery is dependent on State government commitment. TfV (submission 44) has advised that it supports investigating the potential for a train station at Parwan Station in the long term. Council should continue to advocate for the station, however, a bus interchange may be more feasible in the short to medium term (see response to submission 44).</p> <p>Noted.</p> <p>Noted.</p>

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			<p>recommendation to pursue the ELR extension as the infrastructure priority for the Shire.</p> <p>Table 1 of the UGF (Page 8) notes that the timing of development for the Parwan Station Precinct is medium term, 5-10 years; however, Tables 3 &amp; 5 of the UGF state the timing of this area is medium to long term. All three tables note that this timing can be brought forward if there are significant contributions to the ELR construction funding. Development of the Parwan Station Precinct must be able to commence and sufficient funds raised to ensure a staged delivery of the ELR.</p> <p>Firstly, it is considered necessary that all the tables within the UGF are consistent in terms of timing. Section 7 – <i>Housing and Infrastructure</i> of the Background Report notes that it may be <i>'necessary to begin forward planning for future land releases in the medium term. This can be brought forward if needed infrastructure such as the ELR is facilitated'</i>. Given the importance of the ELR in terms of the integrated transport strategy it is considered crucial that the timing for actions linked to funding the Road be brought forward to the short term. As such it is requested that the UGF be amended to ensure that actions that provide funding to the ELR have short term timing.</p> <p><i>Precinct boundaries</i> Tables 1, 3 &amp; 5 of the UGF show the timing for the Parwan Employment Precinct (PEP) as being short to medium term which potentially means that this area will be planned prior to the Parwan Station Precinct. One of the actions for the Parwan Station Precinct shown in <i>Table 5 – Sequencing</i> is to define the southern and</p>	<p>See response to submission 20.</p> <p>See response to submission 20. Funding of ELR is dependent on completion of VicRoads' road corridor study, developer contributions via DCPs/ICPs or s173 agreements (private sector) and a substantial financial commitment from State government.</p> <p>See response to submission 20.</p>

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			<p>western boundaries with applicable buffers. Given that the PEP abuts the Parwan Station Precinct to the south and west then this action also needs to be undertaken through the planning of the PEP.</p> <p>The boundaries of the Precincts within the UGF appear to align with the recommended separation distances from the Odour Assessment prepared by Pacific Environment. The Background report for the UGF notes that <i>'the proposed southern boundary of Parwan Station (future residential and commercial precinct) was based on the 1,400m separation distance'</i>. On face value the 1,400m separation distance from the Parwan WWTP seems excessive. The Odour Assessment notes that some of the findings from the modelling are conservative as <i>'it is unknown how the current plant will respond to an increased treatment load and what additional pre-treatment may be introduced'</i>.</p> <p>Figure 3.9 of the Odour Assessment (page 24) shows the results of the Parwan WWTP as a mechanical treatment plant with inlet works odour control and an increase capacity from an equivalent population of 60,000. The report also notes that <i>'an odour footprint smaller than the current plant can be achieved even with an increase in capacity. This demonstrates that odour from the site can be managed effectively'</i>.</p> <p>The UGF Background Report notes the following: <i>'...the performance of any operation that requires buffers to sensitive uses can vary over time as technology changes and operational efficiencies are sought. Likewise EPA conditions and modelling practices (including codes of practice) will likely also change over time. With growing pressure for development in Bacchus</i></p>	<p>This is correct. See response to submissions 20 and 26.</p> <p>The Pacific Environment odour assessment recommends a buffer of 1.4 kms which is the EPA guideline separation distance for the current treatment plant operations. As demonstrated in the odour study, a buffer distance of 1.4 kms also provides necessary separation from the broiler farm located on Parwan South Road. Debating buffer distances in the UGF is not beneficial, noting that the buffer interface areas shown on the UGF plans are based on EPA guidelines and are therefore the appropriate minimum.</p> <p>As per submission 26, Western Water has advised that it is about to commence an odour dispersion modelling project for the Bacchus Marsh RWP, with a view to applying an ESO to protect the identified buffer area.</p> <p>The Bacchus Marsh RWP may require a larger buffer to cater for the growing population (without treatment plant upgrades). Proponents of development at Parwan Station precinct, as the agent of change, will need to work with Western Water to deliver treatment plant upgrades to facilitate a reduced buffer distance. Any reduced buffer distance must be at least 1.4 kms and will be subject to the proponents committing to a substantial financial contribution towards treatment plant upgrades.</p>



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			<p><i>Marsh district, operational practices in the past may no longer be appropriate into the future. This will need to be negotiated and it is an assumption of Council that all stakeholders (including agencies) will act in good faith to provide equitable and feasible land use and environmental solutions. The modelling undertaken therefore should only be seen as a first pass assessment with a desire of all stakeholders to refine and improve processes before any development occurs in the residential investigation areas'.</i></p> <p>Thus, it is submitted that as the modelling is a 'first pass assessment' it should not be used to categorically define the boundaries of the precincts within the UGF. Instead the boundaries should be noted as being 'subject to further investigation' so that further odour modelling and analysis can refine the form of the residential areas. As noted earlier the provision of residential land within close proximity to the future Parwan station must be maximized to fully utilize the station in terms of servicing the area. The planning for the PEP will potentially occur first and as such the 'further investigation' should take place at this time and should become a key action for the PEP area.</p> <p>Finally, the UGF Plan shows a buffer interface from the Parwan WWTP being located within the Parwan Station Precinct; however, the 1,400m buffer distance does not fall within the Precinct area and as such the 'buffer interface' should be located wholly within the PEP area to the south so that residential development can be located up to the boundary of the precinct.</p>	<p>See above. The interface buffer shown on the UGF plans is appropriate, with a caveat that the Western Water odour dispersion modelling project and further work in the PSP process may lead to further refinement of the exact separation distance.</p> <p>Agreed, however, as per the response to submissions 20 and 26, it is recommended that the precinct planning principles for Parwan Station precinct (page 79) be amended as follows, to articulate a requirement that additional buffers beyond 1,400m (inside Parwan Station precinct) should be negotiated between proponents of change and Western Water with the goal of ensuring industry, in this case the Bacchus Marsh RWP, is sufficiently designed to contain odour emissions:</p> <ul style="list-style-type: none"> <li>• <u>Ensure that land zoned for sensitive uses is located beyond the buffer distance to Bacchus Marsh RWP as</u></li> </ul>

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			<p><i>Integrated Water Management</i></p> <p>The UGF addresses several issues relating to water management such as the protection of the natural and cultural features of waterways; management of existing water infrastructure; re-use of water; flooding; ensuring sufficient water supply for the BMID; recycled water etc. It is also noted that one of the Environment objectives of the UGF is to <i>'pursue a sustainable approach to water management for the town that encourages the re-use of alternative water (such as collected rainwater and stormwater), minimises flood risk, ensures waterway health and contributes towards a sustainable and green urban environment'</i>.</p> <p>Action 28 of Table 4 of the UGF requires a <i>'waterways/creek corridors study to determine rehabilitation, conservation and open space projects including active recreation and cycleway linkages'</i> and this action is linked to the District Open Space Framework. However, there are no specific actions that require the preparation of an integrated water management plan for the entire UGF area that would address the above issues.</p> <p>Thus, it is recommended that an action of the UGF require that an integrated water management plan be prepared for the entire area with input from all of the relevant water authorities that will address the above environmental objective.</p>	<p>determined in Western Water's odour dispersion modelling project; or work with Western Water to deliver treatment plant upgrades to facilitate a reduced buffer distance. <u>Any reduced buffer distance must be at least 1.4 kms and will be subject to the proponents committing to a substantial financial contribution towards treatment plant upgrades.</u></p> <p>Agreed. It is recommended that the UGF be amended as follows: Environment Strategies - Water Management (page 34): Add the following strategy:</p> <ul style="list-style-type: none"> <li>• <u>Prepare an Integrated Water Management Plan for all growth areas, in consultation with relevant water authorities and agencies, to ensure sustainable whole-of-water-cycle management.</u></li> </ul> <p>Tables 1 and 3: Add the following action: Project:</p> <ul style="list-style-type: none"> <li>• <u>Integrated Water Management Plan for all growth precincts: to demonstrate how sustainable whole-of-water-cycle management will be provided to all growth areas.</u></li> </ul> <p>Timing: Short term. Responsibility: Council/VPA</p>

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			<p><i>Parwan Gorge</i> Parwan Gorge is considered to be an area of significance to the Bacchus Marsh area for the following reasons:</p> <ul style="list-style-type: none"> <li>• It has a high scenic value;</li> <li>• The Gorge also has a high environmental value as evident by the following: <ul style="list-style-type: none"> <li>○ Significant bird habitat</li> <li>○ Refuge for marsupials, reptiles and monotremes</li> <li>○ Escarpment and riverine environment has unique flora such as the Werribee River Blue Box;</li> </ul> </li> <li>• The Gorge has significant potential passive recreation use.</li> </ul> <p>It is requested that the significance of the Parwan Gorge be highlighted on <i>Plan 3 – Natural Features and Open Space</i> of the UGF and that that key environmental attributes be incorporated into the open space network so they can be enjoyed by future residents. This designation into the open space network could be implemented through the development of PSPs for the area.</p> <p><u>Requested Change:</u></p> <ul style="list-style-type: none"> <li>• Tables 1, 3 and 5 of the UGF be amended so that the timing of key actions of the Parwan Station Precinct be delivered in the short - medium term.</li> <li>• That the second note of Tables 1 &amp; 3 of the UGF be amended to read as follows: <ul style="list-style-type: none"> <li>• 'Timing can be brought forward to short term if a detailed funding strategy to deliver the ELR can be established'.</li> </ul> </li> </ul>	<p>Noted and agreed.</p> <p>Agreed. Plan 8 (Key Actions) in the UGF includes an annotation "Gorge Park &amp; potential connection". It is recommended that this be amended to "<u>Parwan</u> Gorge Park &amp; potential connection".</p> <p>It is recommended that Plan 3 of the UGF be amended to include reference to Parwan Gorge.</p> <p>Disagree. See response to submission 20.</p> <p>Disagree. See response to submission 20.</p>

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			<ul style="list-style-type: none"> <li>• That the final note of Table 5 of the UGF be amended to read as follows: <ul style="list-style-type: none"> <li>• 'Timing dependent on land supply and demand analysis in the first instance, but timing should be brought forward to the short term if a detailed funding strategy to deliver the ELR can be established'.</li> </ul> </li> <li>• Table 5 of the UGF be amended to include the following action for the PEP area: <ul style="list-style-type: none"> <li>• 'Undertake further investigation of applicable buffers to define the shared boundaries of the Parwan Station Precinct'.</li> </ul> </li> <li>• That the note on all relevant plans within the UGF be amended to read as follows: <ul style="list-style-type: none"> <li>• 'Boundary alignment subject to further investigation'.</li> </ul> </li> <li>• The buffer interface area be removed from the southern section of the Parwan Station Precinct from all relevant plans of the UGF.</li> <li>• A new action be added to Table 4 of the UGF that requires the provision of an integrated water management plan for the entire UGF area that addresses the Environmental objectives of the Plan.</li> <li>• Plan 3 – Natural Features and open Space be amended to highlight the significant contribution that Parwan Gorge may make to the open space network.</li> </ul>	<p>Disagree. See response to submission 20.</p> <p>See response to submission 20.</p> <p>See response to submission 20.</p> <p>Agreed. See response to submission 20.</p> <p>Agreed. See above.</p> <p>Agreed. See above.</p>

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			<p><u>Proposed changes to the Exhibited Clause 21.03 – Settlement and Housing:</u></p> <p>The Parwan Station Residential/Commercial Growth Precinct including the future railway station is nominated by the UGF as a strategic outcome area to support the growth of Bacchus Marsh. Additionally, the UGF also identifies the preparation of the Precinct Structure Plan (PSP) and rezoning of land as being key growth actions. However, the proposed changes to Clause 21.03 do not include any specific strategies to facilitate the development of this area or any other residential growth areas.</p> <p>The UGF notes that growth within the identified outcome areas, including the Parwan Station Precinct, will be guided by precinct planning. The UGF also notes that the timing of the rezoning and PSP preparation actions for the Parwan Station Precinct area is classified as being medium to long term which can be brought forward if there are significant contributions to the ELR construction funding.</p> <p>In order to facilitate the development of the Parwan Station Precinct and improve the implementation of the UGF it is submitted that Clause 21.03 should contain strategies that encourage the rezoning of the land to Urban Growth and the preparation of a Precinct Structure Plan as it will be this process that initiates the significant contribution towards the ELR. That is, development is required in order to generate the development contribution.</p> <p><u>Requested Change:</u></p>	<p>As per response to submission 20: The UGF (in Tables 1 and 3) nominates the proponent as being responsible for delivering Parwan Station and Merrimu growth precincts. Thus, there is no need for the exhibited MSS Clause 21.03 to list future strategic work to be undertaken by Council.</p> <p>As per response to submission 20: Disagree. This is unnecessary, as the UGF anticipates that the residential growth precincts will be delivered by the proponent (see above). The exhibited MSS Clause 21.07-7 (Implementation) includes a strategy to:</p> <ul style="list-style-type: none"> <li>• “Apply the Urban Growth Zone to the investigation areas at Merrimu, Parwan Station and Merrimu.”</li> </ul>

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			<ul style="list-style-type: none"> <li>• Include the following Strategy under Clause 21.03-2:               <ul style="list-style-type: none"> <li>• 'Facilitate the development of the Parwan Station Precinct by preparing a precinct structure plan, a development/infrastructure contributions plan and a clear funding strategy'.</li> </ul> </li> <li>• Include the following specific application of zones and overlays under Clause 21.03-6- Implementation:               <ul style="list-style-type: none"> <li>• 'Apply the Urban Growth Zone to all land within the Merrimu, Parwan Station and Parwan Employment precincts of the Bacchus Marsh Urban Growth Framework Plan'.</li> </ul> </li> </ul> <p><u>Proposed changes to the Exhibited Clause 21.04 – Economic Development and Employment:</u></p> <p>The Parwan Station Precinct is shown as being a future residential/commercial growth precinct within the UGF and has abuttal to the west and south to the Parwan Employment Precinct (PEP) and as such it is submitted that there could be potential conflicts between industries and sensitive uses. Thus, it is submitted that areas within the Parwan Station Precinct and the PEP that are located close to future residential areas be designated for uses such as service industries that have less impact on sensitive uses.</p> <p>It is considered illogical that a heavy industrial use that generates a buffer to a sensitive use could be allowed to locate close to the southern boundary of the Parwan Station Precinct so that it could potentially generate buffers that impact land surrounding the future train station. The UGF nominates the area surrounding the future Parwan train station as being suitable for high</p>	<p>Disagree. See response to submission 20.</p> <p>Disagree. See response to submission 20.</p> <p>See response to submission 20.</p> <p>See response to submission 20.</p>

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			<p>density residential. It is noted that Page 76 of the UGF includes the following action:</p> <p><i>'Prepare a land use amenity plan to provide appropriate buffers to sensitive uses and avoid incompatible land uses'.</i></p> <p>It is suggested that the exhibited Clause 21.04 mentions this 'amenity plan' to ensure that commercial or industrial uses located within the PEP adjacent to the southern boundary of the Parwan Station Precinct do not generate a need for buffers from sensitive uses. It is submitted that there is sufficient land within the PEP to locate heavy industrial uses that generate significant buffers to sensitive uses.</p> <p><u>Requested Change:</u></p> <ul style="list-style-type: none"> <li>• Include the following Strategy under Clause 21.04-4: <ul style="list-style-type: none"> <li>• 'Avoid incompatible future land use conflicts by preparing a land use amenity plan that ensures any new industrial use with the Parwan Employment Precinct is adequately separated from sensitive uses, further than any buffer that the use may generate. This is particularly important adjacent to the southern boundary of the Parwan Station Precinct of the Bacchus Marsh Urban Growth Framework Plan'.</li> </ul> </li> </ul> <p><u>Proposed changes to the Exhibited Clause 21.07 – Bacchus Marsh:</u></p> <p>It is noted that this Clause contains Strategies to require and implement precinct structure plans for the Parwan Station and Parwan Employment Precincts and also contains specific applications for the Urban Growth Zone for these areas. However, it is considered that this</p>	<p>See response to submission 20.</p> <p>Agreed. See response to submission 20.</p> <p>This is not necessary. See response to submission 20.</p>

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			<p>Clause should also make reference to a land use amenity plan to ensure that future residential areas of the Parwan Station Precinct are protected from buffers generated by heavy industrial uses.</p> <p>This Clause requires separation between residential development and existing uses with off-site impacts such as the Maddingley Brown Coal Mine. However, there is no requirement that acknowledges the potential conflict between future industrial uses within the Parwan Employment Precinct (PEP) and the future residential uses, particularly those to the south of the Parwan Station Precinct. The potential future Parwan train station is located towards the south of the Precinct and the UGF encourages higher density residential development around this station. Thus, there is a potential for residential development surrounding the train station to be impacted by buffers generated by heavy industrial uses within the PEP which is submitted to be an undesirable outcome for the area.</p> <p>The Background Report also highlights this issue and explicitly states that <i>'significant transitional zones will need to be between Maddingley Brown Coal and the Parwan Wastewater and any future residential development near or around Parwan Station. Within these transitional zones only uses that don't generate additional buffers will be allowed to establish. Further studies on what these uses should include will be delivered via future PSPs'</i>. It is submitted that there is an abundance of land within the PEP area to accommodate uses that will generate separation buffers and so again it is considered necessary for this Clause to include a Strategy that requires the preparation of a land use amenity plan so that heavy industrial uses are restricted</p>	<p>See response to submission 20.</p> <p>See response to submission 20.</p>



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			<p>or even prohibited adjacent to the southern boundary of the Parwan Station Precinct.</p> <p><u>Requested Change:</u></p> <ul style="list-style-type: none"> <li>• Include the following Strategy under Clause 21.07-2: <ul style="list-style-type: none"> <li>• 'Avoid incompatible future land use conflicts by preparing a land use amenity plan that ensures any new industrial use with the Parwan Employment Precinct is adequately separated from sensitive uses, further than any buffer that the use may generate. This is particularly important adjacent to the southern boundary of the Parwan Station Precinct of the Bacchus Marsh Urban Growth Framework Plan'.</li> </ul> </li> </ul>	<p>This is not necessary. See response to submission 20.</p>

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29	4164 Geelong-Bacchus Marsh Road, Parwan	Supports Amendment subject to changes	<p>The subject property is located within the Parwan Employment Precinct (PEP).</p> <p>The PEP is acknowledged as a major initiative by the UGF as it will contain significant economic and employment growth potential for the Bacchus Marsh area. The success of the PEP is reliant upon the development of the ELR which will provide freight connections to the Western Freeway, Geelong to the south and agricultural areas to the north.</p> <p>Generally, we are very supportive of the UGF, Amendment C81 and all supporting documentation. We believe that the UGF is a detailed blueprint of how the Bacchus Marsh region should develop into the future and provides an excellent initiative to drive such growth. However, we believe that there are some minor changes to the exhibited UGF and the planning scheme amendment documents that will improve the implementation of the UGF.</p> <p>For ease of understanding this submission outlines each matter of concern, provides a short summary of the matter and a requested change that we believe will enhance the deliverability of the Bacchus Marsh UGF Plan and importantly progress the planning process towards the Precinct Structure stage.</p> <p>Proposed changes to the Bacchus Marsh Urban Growth Framework Plan:</p> <p>Future land uses located within the PEP:</p>	<p>Noted.</p> <p>Noted.</p>

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			<p>The UGF does not provide much detail regarding the future land uses that are to be located within the PEP except that it notes that the land is suitable for agriculture and related uses due to the soil quality, proximity to the BMID and ability to be serviced with water. The UGF states that likely occupiers include meat processing, feed lot/saleyards, mushrooms, poultry, hydroponics and associated co-located industries. One of the Employment objectives of the UGF also states that this area will contain value-adding agribusiness and export-led businesses.</p> <p>Pursuant to Plan 1 of the UGF the subject property is located within a buffer interface area and is located close to the south-western corner of the Parwan Station Precinct. Given this location it is necessary that any new land uses in this area do not generate additional buffers to residential areas so as not to impact on the future development of the Parwan Station Precinct. Some of the 'likely' uses listed above will generate additional buffers to sensitive land uses such as residential.</p> <p>The Background Report of the UGF notes that the subject property is located within the 'transitional zones' that are located between the Maddingley Brown Coal Mine and the Parwan WWTP and the future Parwan Train Station. The Background Report states that 'within these transitional zones only uses that don't generate additional buffers will be allowed to establish. Further studies on what these uses should include will be delivered via future PSPs'.</p> <p>In order to address the issue of possible land use conflicts within the 'transitional zones' it is suggested</p>	<p>Noted.</p> <p>The UGF has been prepared concurrent with ongoing analysis of how best to deliver the PEP. This includes a planning study and a business case, both of which are currently under development. This work is ongoing and Council will continue to work with affected landowners on PEP delivery.</p> <p>The ultimate mix of land uses for the PEP, including the buffer interface areas, will be determined at the future PSP stage.</p> <p>Agreed.</p> <p>Agreed.</p> <p>Agreed. It is recommended that the precinct planning principles in the UGF be updated to more clearly address these issues, as follows:</p>

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			<p>that the PEP area be planned in a holistic manner. It is submitted that there is an abundance of land within the PEP area to accommodate uses that will generate separation buffers such as those listed above and as such it is recommended that the areas closer to the future Parwan Station residential precinct be allocated for uses that will not impact on sensitive uses. Such uses would include bulky goods especially given that the UGF identifies that 'significant retail expenditure escape is currently occurring in the bulky goods sector'. Flexibility will need to be built into the planning of the PEP to allow for such land uses.</p> <p>Whilst the alignment of the ELR has not yet been determined there is a strong possibility that the connection to Geelong-Bacchus Marsh Road may occur close to the subject property. Thus, we believe that the property can play a key role in also accommodating other ancillary uses that are supported by the proximity to the airport, main road frontage, existing industries and the growing community. These may include again a bulky goods precinct or service centres and the like.</p> <p>Notwithstanding the above, we are keen to better understand the anticipated uses that will be accommodated in the PEP and further review the potential alignments of the ELR which may impact this site.</p> <p>Requested Change:</p> <ul style="list-style-type: none"> <li>That the UGF identify the transitional zones located between the Maddingley Brown Coal Mine and the Parwan WWTP and the future Parwan Train Station as containing land uses that will vary from the rest</li> </ul>	<p>Parwan Employment Growth Precinct: Add the following precinct planning principle:</p> <ul style="list-style-type: none"> <li><u>Apply a different zone control to the buffer interface areas (i.e. different to the balance of the PEP), to ensure that new land uses do not generate a need for an amenity buffer to sensitive uses.</u></li> </ul> <p>Parwan Station Residential and Commercial Growth Precinct: <del>Along the western and southern edges of existing use</del> <u>Amenity buffers interface areas:</u></p> <p>Add the following precinct planning principle:</p> <ul style="list-style-type: none"> <li><u>Apply a different zone control to the buffer interface areas (i.e. different to the balance of the precinct), to ensure that sensitive uses, intensive agricultural uses and uses with adverse amenity potential (as listed under VPP Clause 52.10) are prohibited.</u></li> </ul> <p>As discussed above, the ultimate mix of land uses for the PEP, including the buffer interface areas, will be determined at the future PSP stage. The PSP process will necessarily include consideration of the potential alignment of the ELR.</p>

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			of the PEP area. As such the UGF should also note the possibility that these 'transitional zones' will also be zoned differently.	Refer to comments above regarding recommended amendments to the UGF.

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30	136 O'Connell Road, Merrimu	Supports amendment	<p>We have read the Bacchus Marsh UGF - Oct 2017 and wish to register our full support for its content. It is comprehensive, well constructed and provides a balanced position on the various competing and often conflicting needs of the community.</p> <p>Our property sits on the northern escarpment overlooking the Bacchus Marsh basin within the Merrimu Residential Growth Precinct and we fully support the detailed planning considerations outlined for that area within the framework document (page 73). Many of the concerns/issues listed in our past submissions have been taken into account and incorporated into the listed planning considerations.</p> <p>We understand that VicRoads is responsible for the final positioning and building of the all-important Eastern Link, but wish to reiterate our strong belief that it is definitely needed, but not in the Valley. The Avenue of Honour and remaining market garden agricultural areas must remain untouched if at all possible.</p>	<p>Noted.</p> <p>Noted.</p> <p>As previously discussed, the State government has committed \$3M for a road corridor planning study which will likely take two to three years to complete. This study will identify one or more preferred road alignment options, based upon identified constraints such as environmental values/risks, quality agricultural land, heritage, landholdings, etc.</p>
31	90 Parwan-Exford Road, Parwan	Supports amendment subject to changes	<p>Our client owns the land know as 90 Parwan–Exford Road. Parwan which will be affected by the proposed Urban Growth Framework (UGF). The property is immediately to the south of the proposed new station and is ideally suited to provide for the transit orientated residential and commercial development envisaged by the UGF.</p> <p>Plan 1 identifies the land as within the Parwan Station Residential &amp; Commercial Growth Precinct, my client supports this initiative and agrees with the intention to deliver a range of uses within this precinct.</p>	<p>The subject land is located within the Parwan Station urban growth precinct. Appropriate land uses and zone controls will be determined at the PSP stage. The PSP process will require detailed consideration of the amenity buffer distances from the Bacchus Marsh Recycled Water Plant, Maddingley Waste and Resource Recovery Hub which is of State significance.</p> <p>Noted.</p>

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			<p>However we wish to add that the phasing of the development set out in Chapter 10 – Implementation of the UGF is in my clients view prohibiting the delivery of important development that has the potential for significant net community benefit.</p>	<p>Disagree. The emphasis in the short term should be on developing infill and greenfield sites within the existing Bacchus Marsh urban area. A number of detailed technical studies/investigations will need to be completed before the PSP process can commence, such as:</p> <ul style="list-style-type: none"> <li>• There is no justification for delivery of this precinct within the short term (i.e. within 5 years), as there is an adequate land supply within the existing urban area. The adopted housing strategy titled 'Housing Bacchus Marsh to 2041' (dated 2017) concludes the following with respect to land supply: "In terms of zoned broadhectare residential land stocks, it is estimated <i>there are sufficient land stocks to satisfy between 16 and 27 years of demand, it is considered that 20 years of broadhectare supply is the most likely.</i></li> <li>• The ELR corridor planning study, which has recently been commenced by VicRoads and is expected to take approximately 2-3 years to complete;</li> <li>• A planning study for the Maddingley Brown Coal mine / waste recovery facility site and associated amenity buffer area, to determine appropriate planning controls (refer to response to submission 21);</li> <li>• A substantial body of work is required to prepare either a Development Contributions Plan or Infrastructure Contributions Plan. Council would need to ensure the equitable application of development contributions across all growth precincts.</li> <li>• A range of technical studies relating to the precinct and surrounds, such as biodiversity, bushfire risk, cultural and European heritage, integrated transport, infrastructure, etc.</li> </ul>
32	124 South Maddingley Road, Maddingley	Comments only	<p>I wish to have it noted that I still dispute the way our property is being treated by your planning department and would like to continue our discussions on the rating levels applied at a per dollar percentage to our property's assessed value.</p>	<p>Neither the Moorabool Planning Scheme or the <i>Planning and Environment Act 1987</i> require or enable consideration of any potential impact that the amendment may have on rates.</p>

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			<p>Also, I would like to continue (not giving up) on how the Special Use Zone should be modified to reflect the use and area it is applied over.</p> <p>The way you display the buffer zones (or not) on the plans also needs to be reviewed.</p>	<p>The submitter's concern has some merit. The issue is that the Special Use Zone Schedule 1 (Coal Mining) not only applies to Maddingley Brown Coal mine / waste recovery facility, but also to large areas of land beyond this site (including the submitter's land), to the north, south, east and west.</p> <p>As discussed in the response to submission 21, it is recommended that the UGF be amended to include an action for a planning study to be undertaken (in the short term) for the Maddingley Brown Coal mine / waste recovery facility site and associated amenity buffer area (i.e. including the submitter's land), to determine appropriate planning controls (refer to response to submission 21).</p>
33	35 Ruxton Way, Hopetoun Park	Comments only	<p>Would like to see the following considered for the Hopetoun Park North area:</p> <ul style="list-style-type: none"> <li>• Lot sizes of no less than 4,000m<sup>2</sup>;</li> <li>• A small general store;</li> <li>• Park with native plants; BBQs for public use;</li> <li>• Playground and BMX track.</li> </ul> <p>In keeping with the atmosphere of the Hopetoun Park area the lot sizes should reflect what is in the current environment. The surrounding environment is farmland/semi-rural and the lot sizes should respect that. This is an opportunity to develop something really special and fitting to the area.</p> <p>In addition, I support the ELR.</p>	<p>The draft UGF (on page 81) states that:</p> <p>“Hopetoun Park North is an existing low density residential community. The area to the north has potential for a greenfield expansion at more conventional (i.e. smaller) lot sizes than the existing lots to the south. This would create three to five years' land supply.”</p> <p>“Hopetoun Park is located at the eastern edge of the Bacchus Marsh District, in a relatively isolated area with limited local community facilities. Residential expansion can be leveraged to deliver new local-level community facilities. .... “</p> <p>It is not considered appropriate to apply a minimum lot size of 4,000m<sup>2</sup> across the whole of the Hopetoun Park North precinct. Lots of this size will not provide the density required to deliver local community facilities.</p> <p>The exhibited amendment documentation (MSS Clause 21.07-7 Bacchus Marsh – Implementation) states:</p>



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				<ul style="list-style-type: none"> <li>“Apply either the Low Density Residential Zone or the Neighbourhood Residential Zone to any urban growth precinct at Hopetoun Park.”</li> </ul> <p>There is sound justification for applying either the Low Density Residential Zone (LDRZ) or the Neighbourhood Residential Zone (NRZ) to the Hopetoun Park North precinct, as these zones enable minimum lot sizes to be specified. The application of LDRZ may be appropriate around the periphery of the precinct, at the interface with the freeway to the north, the existing LDRZ to the south, the Bacchus Marsh Irrigation District to the west and green wedge land to the east. The application of NRZ may be appropriate in the core of the precinct, to facilitate a walkable catchment for any future neighbourhood activity centre.</p> <p>A future planning scheme amendment will be required, to rezone the land and introduce a Development Plan Overlay. Details of the ultimate zone boundaries, minimum lots sizes, open space and community facilities will be determined as part of this future process.</p>
34	Hopetoun Park Hopetoun Park residents & landowners	Comments only	<p>In summary, our concerns and recommendations are as follows:</p> <ol style="list-style-type: none"> <li>1. We are opposed to the rezoning of Hopetoun Park North to NZR.</li> <li>2. We are concerned about the impact rezoning Hopetoun Park North will have on Hopetoun Parks character, accessibility and sense of community.</li> <li>3. We are concerned about the impact of local community facilities without adequate additional resourcing.</li> <li>4. We are concerned about the potential increased threat to safety as a result of accessibility issues and possible increased crime.</li> </ol>	Refer to comments below.

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			<p>5. We recommend that Hopetoun Park North is rezoned to LDZR at most, and that any future development ensure a natural transition between 'new and old'.</p> <p><u>Small town expansion / character of Hopetoun Park:</u></p> <p>Whilst we acknowledge and appreciate the continuing demand for new housing and infrastructure, we are opposed to Hopetoun Park North being rezoned as NZR.</p> <p>Excluding the area identified as Hopetoun Park North, the size of existing properties ranges from approximately 1.5 acres to 3 acres. This has not only enabled Hopetoun Park to retain its rural character (including native wildlife), but to also develop a strong sense of community. Rezoning Hopetoun Park North to NZR will jeopardise both of these qualities and is inconsistent with ensuring "Bacchus Marsh remains a regional settlement with its own unique identity and not a physical extension of Melbourne's rapid growth".</p> <p>Further, whilst the UGF cites the establishment of building envelope limits to manage gateway views when arriving in Bacchus Marsh and from the Western Freeway and Avenue of Honour, there is no mention / recognition of the need to manage the views for existing residents / property owners. For example, if Hopetoun Park North is rezoned as NZR with approximately 600m<sup>2</sup> properties, the residents on the south side of Hopetoun Park Road may have up to five or six properties directly opposite.</p>	<p>The draft UGF (on page 81) states that:</p> <p>"Hopetoun Park North is an existing low density residential community. The area to the north has potential for a greenfield expansion at more conventional (i.e. smaller) lot sizes than the existing lots to the south. This would create three to five years' land supply."</p> <p>"Hopetoun Park is located at the eastern edge of the Bacchus Marsh District, in a relatively isolated area with limited local community facilities. Residential expansion can be leveraged to deliver new local-level community facilities. .... "</p> <p>It is not considered appropriate to apply a minimum lot size of 4,000m<sup>2</sup> across the whole of the Hopetoun Park North precinct. Lots of this size will not provide the density required to deliver local community facilities.</p> <p>The exhibited amendment documentation (MSS Clause 21.07-7 Bacchus Marsh – Implementation) states:</p> <ul style="list-style-type: none"> <li>• "Apply either the Low Density Residential Zone or the Neighbourhood Residential Zone to any urban growth precinct at Hopetoun Park."</li> </ul>

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			<p><u>Rezone to LDZR:</u></p> <p>In view of the above, we submit that Hopetoun Park North should be rezoned LDZR at most (preferably no less than 4000m<sup>2</sup> lots). Further, that any future development ensure a transition phase between Hopetoun Park and Hopetoun Park North. That is, properties around the perimeter of Hopetoun Park North should be larger to provide a much more natural transition.</p> <p>It is axiomatic that the current residents / property owners moved to / are moving to Hopetoun Park because of its rural character and safe large open spaces for the families; escaping the increasingly over-developed and crime burdened suburbia.</p> <p><u>Accessibility Risk:</u></p> <p>Given the geographical location of Hopetoun Park, and the fact that it is largely surrounded by the Werribee River, current and future options to increase accessibility by road are limited. At present, Hopetoun Park Road is the only road available to enter and exit Hopetoun Park.</p>	<p>There is sound justification for applying either the Low Density Residential Zone (LDRZ) or the Neighbourhood Residential Zone (NRZ) to the Hopetoun Park North precinct, as these zones enable minimum lot sizes to be specified. The application of LDRZ may be appropriate around the periphery of the precinct, at the interface with the freeway to the north, the existing LDRZ to the south, the Bacchus Marsh Irrigation District to the west and green wedge land to the east. The application of NRZ may be appropriate in the core of the precinct, to facilitate a walkable catchment for any future neighbourhood activity centre.</p> <p>A future planning scheme amendment will be required, to rezone the land and introduce a Development Plan Overlay. Details of the ultimate zone boundaries, minimum lots sizes, open space and community facilities will be determined as part of this future process.</p> <p>In response to concerns relating to crime, this is largely a policing matter rather than a planning one. However, the development plan will need to ensure that quality urban design outcomes are achieved, including maximising opportunities for passive surveillance over public land and community facilities.</p> <p>As per the response to submission 4, the UGF includes a precinct planning principle relating to improved road connectivity for Hopetoun Park North. It is recommended that this principle be amended as follows:</p> <p><i>Consider opportunities to improve road connectivity <del>ons in and out of the precinct, onto</del> with the Western Freeway to and from</i></p>

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			<p>If the number of residents is increased fourfold, and Hopetoun Park Road remains the only means of entering and existing Hopetoun Park, there is an increased risk to the safety of all residents in the case of an emergency; particularly, if evacuation is required.</p> <p>Whilst we in no way seek to compare the bushfire risk posed to Hopetoun Park, nor to detract from the devastation caused by the Black Saturday bushfires, we wish to point out that the Royal Commission raised and addressed accessibility concerns.</p> <p>We encourage Council to investigate other sites for entry into / exit from Hopetoun Park. Further, in relation to an onramp to the Western Freeway towards Ballarat, to consider upgrading the current off ramp by building an overpass or some other form of interchange; particularly if it is not feasible to upgrade the existing overpass to achieve this.</p> <p><u>Local community infrastructure:</u></p> <p>The UGF rightly points out that there are currently no community facilities in Hopetoun Park. Accordingly, residents of Hopetoun Park are somewhat reliant on services such as health care, child care, education, community centres, sporting clubs and shopping precincts being provided in the Melton and Bacchus Marsh regions.</p> <p>Although a shop and child care centre may be of some benefit in Hopetoun Park, this will not negate demand on the above services in the Melton and Bacchus</p>	<p><del>the west, and as well as Hopetoun Park junction with the Old Western Highway from Hopetoun Park Road.</del></p> <p>Refer to submission 49 for the CFA's submission and Council officer response.</p> <p>Noted.</p> <p>Council's Community Infrastructure Framework (CIF) recognises that existing residents of Hopetoun Park rely on community services and facilities in Bacchus Marsh and Melton and that those facilities also service the broader population. The CIF provides strategic spatial assessment tools that assess the quantity, distribution and capacity of facilities required to service the broader community. Council is therefore confident that the planning approach that supports the UGF will identify sufficient facilities to create a network with enough capacity to accommodate the growing demand from Hopetoun Park residents as well as other areas.</p>

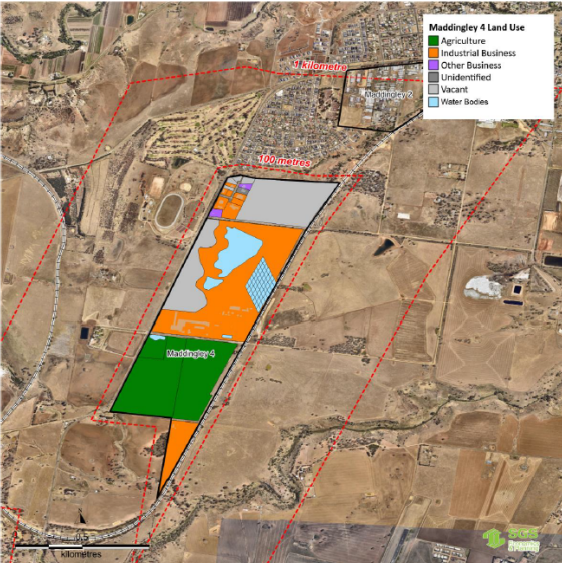
Submission Number	Affected Property/ Agency	Submitter's Position	Submission Summary	Council Officer Recommendations/Comments (N.B. Underlining indicates added text. Strikethrough indicates deleted text.)
			<p>Marsh regions, and will overwhelm these services without adequate additional resourcing.</p> <p>With respect to education, we understand that Hopetoun Park is currently in Melton school zones. Therefore, we would expect Council to consult with Melton Shire Council, the Department of Education and other education providers in Melton to develop a</p>	<p>It is anticipated that the ultimate population of Hopetoun Park, once fully developed, will be sufficient to support a local community centre comprising recreation uses, a multipurpose community venue and shop. Residents will still need to access larger facilities such as child care and major sports grounds in surrounding areas.</p> <p>Development contributions will be applied to future development at Hopetoun Park North. While development contributions can only be put towards community facilities that meet the demand of new residents at Hopetoun Park North, Council will consider augmenting investment in new facilities so that they can also service the pre-existing population.</p> <p>Retail services:</p> <p>Retail services such as shops are provided by the private sector. Council's role as a planning authority is to ensure that there is an adequate supply of appropriately zoned land for commercial uses. There is a plentiful supply of vacant or under-utilised commercial zoned land within the Bacchus Marsh urban area, particularly within the Bacchus Marsh Main Street activity centre. The Merrimu and Parwan Station growth precincts provide opportunities for new activity centres to be developed over time.</p> <p>Education:</p> <p>Refer to responses to submissions 18 (Department of Education and Training) and 9 (Catholic Education Melbourne).</p>

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			<p>coordinated approach to ensure the same level of community facilities remain accessible.</p> <p>Further, we would also expect Council to consult with the relevant emergency services authorities to ensure adequate resourcing to local policy, ambulance and fire fighting services.</p> <p><u>Recommendation:</u></p> <p>For the reasons outlined above, we recommend that Hopetoun Park North is rezoned to LDRZ at most.</p>	<p>Emergency services:</p> <p>In accordance with standard practice, Council has notified all relevant agencies of Amendment C81 and the UGF, including the CFA. Refer to submission 49 for the CFA's submission and Council officer response.</p> <p>A future planning scheme amendment will be required to rezone land and to introduce a new Schedule to the DPO. Any future amendment will be exhibited, including notification to all relevant agencies. A range of technical studies will be required to support and inform a future planning scheme amendment and development plan, such as biodiversity, bushfire risk, cultural and European heritage, integrated transport, infrastructure, etc.</p> <p>Not supported, for the reasons outlined above.</p>



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35	Land generally bounded by Kerrs Road, Gullines Road, Parwan Creek, railway line, Rowsley Station Road and Bacchus Marsh – Balliang Road.	Comments only	<p>Our client is a significant land owner in Maddingley and Bacchus Marsh and has a strong and vested interest in the future development of the town. Our client's land holdings comprise of numerous parcels generally to the south of the Maddingley. The land is generally bounded by Kerrs Road and Tilley's Road to the north, East Maddingley Road to the east, Abby Lane and Parwan Creek to the south and Bacchus Marsh – Balliang Road to the west.</p> <p>Our client's land comprises land within both the Industrial 2 Zone (IN2Z), Industrial 1 Zone (IN1Z) and Farm Zone (FZ). The JBD Industrial Park (formerly CSR land) located within the IN2Z land contains a number of active industrial uses as well as the potential for future uses which can take benefit from the proximity to the Maddingley Coal facility to the east. Many of the current operators at the park have located within the facility primarily due to its lack of proximity to more sensitive uses. The park is a significant employment generator in the local area and has the ability to continue to be a key growth area for the Shire.</p> <p>At this stage we object to the inclusion of the Urban Growth Framework as a reference document at Clause 21.01 for the following reasons.</p> <ul style="list-style-type: none"> <li>The outcome of the proposed Urban Growth Framework (UGF) is that the land surrounding JBD Industrial Park, and the park itself, are to be designated for significant development. Whilst JBD Industrial Park Pty Ltd are supportive of growth and investment into Maddingley and Bacchus Marsh, they are firmly of the view that the existing operations at JBD Industrial Park should be recognised and protected and are concerned that</li> </ul>	<p>Noted.</p> <p>Noted. The subject land is separated from the nearest residential zone by approximately 400 metres at the closest point.</p> <p>The submitter has misinterpreted the intent of the UGF and the exhibited MSS clauses, however, it is acknowledged that the exhibited documents contain some inconsistencies.</p> <p>The subject land forms part of the 'Maddingley 4' industrial precinct (see Figure 11 below), as described in the Council adopted Moorabool Industrial Areas Strategy 2015 (MIAS).</p>



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			<p>the current wording and form of the UGF does not adequately provide for this.</p> <ul style="list-style-type: none"> <li>Insufficient detail is provided as to what “service industries” are proposed to be located north of Kerrs Road. JBD Industrial Park Pty Ltd object to the encroachment of sensitive uses into the buffer areas required to allow for the continued operations and future growth of JBD Industrial Park.</li> <li>Plan 5 indicates that JBD Industrial Park will be designated as transitional local services industry areas. We strongly object to this change in designation which could prejudice the viability and growth of the park, particularly its ability to interact with the Maddingley Coal Mine operations. Furthermore this is at odds with the Shire of Moorabool Industrial Strategy 2015 which states at paragraph 2.5.5”</li> <li>“The land (JBD) is highly suitable for large scale industrial development given its flat topography, existing infrastructure and proximity to the coal resource. The northern most lot contains significant effluent disposal infrastructure with evaporative dam, sludge ponds and irrigation areas, which would be advantageous for large processing industries.</li> <li>In this instance, the Industrial 2 zoning is appropriate given the nature of the uses that would be attracted to the area and the lack of any adjoining residential development.”</li> <li>Accordingly we request that Clause 21.07-2 Objective – Managing Urban Growth be amended to include reference to the importance of the uses with the IN2Z land particularly the importance of JBD Industrial Park and the significant role</li> </ul>	<p><b>Figure 11:</b> ‘Maddingley 4’ industrial precinct, as described in the MIAS 2015.</p> <p>The MIAS notes that:  <i>“Indeed, this is the only existing industrial precinct near the western end of the Shire is possesses some reasonable buffer distances from sensitive uses. Nonetheless, the buffer distances are still not ideal, as almost half the precinct is still within 1km of sensitive uses.”</i></p> <p><i>“The JBD Industrial Park is a significant industrial site within the precinct, containing 9 individual businesses. Owners of the site intend to continue subdividing and expanding the Park to create a major industrial complex.”</i></p> 

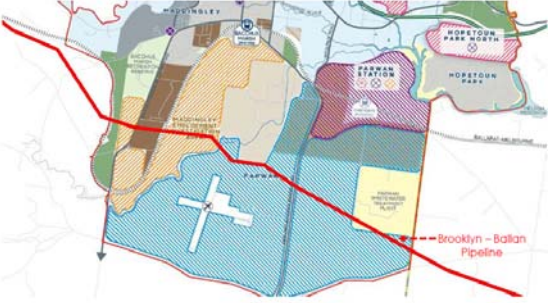
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			<p>operators within the park play in providing significant employment opportunities for the area.</p> <ul style="list-style-type: none"> <li>• The UGF and MSS should be redrafted to place greater emphasis on the importance of existing employment uses such as JBD Industrial Park. Existing facilities should also be considered as part of the growth plans for the south of the town.</li> <li>• - In relation to the balance of the JBD Industrial Park Pty Ltd land currently zoned as FZ, whilst we support the consideration of this land for future development. It is unclear from the UGF and proposed MSS documents exactly how this land is to be development and the supporting documents should clearly state (preferably within Plan 1 and Plan 5) that the future uses must be compatible with the buffer distances required by the existing uses at JBD Industrial Park.</li> </ul>	<p>The UGF seeks to respond to this precinct's context, by encouraging service industries to locate to the north of Kerrs Road due to the close proximity to residential zoned land. The UGF includes the following strategies in relation to service industry (page 45):</p> <ul style="list-style-type: none"> <li>• Encourage service industries to establish in Maddingley (north of Kerrs Road).</li> <li>• Investigate rezoning the Park Street Maddingley industrial precinct from Industrial 2 Zone to Industrial 3 Zone or Mixed Use Zone, to limit manufacturing and facilitate service industry and other compatible uses.</li> <li>• Investigate rezoning the Griffith Street Maddingley industrial precinct from Industrial 2 Zone to Industrial 3 Zone.</li> </ul> <p>It is recommended that the first strategy be amended to:</p> <ul style="list-style-type: none"> <li>• Encourage service industries to establish in Maddingley (north of Kerrs Road) <u>and investigate rezoning this precinct from Industrial 2 Zone to Industrial 3 Zone.</u></li> </ul> <p>This will alleviate any ambiguity about perceived potential for encroachment of sensitive uses.</p> <p>Plan 5 – Employment (UGF; page 40) incorrectly identifies the whole of the 'Maddingley 4' industrial precinct as a 'transitional service industry area'. It is recommended that Plan 5 be amended to just show the area north of Kerrs Road as a 'transitional service industry area', and the area south of Kerrs Road as an 'existing industrial area'</p> <p>The exhibited MSS Clause 21.04 (Economic development and employment) includes the following strategies amongst others:</p> <p>Clause 21.04-4 Objective - Industry:</p>

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				<ul style="list-style-type: none"> <li>• Encourage service industries to establish in Maddingley (north of Kerrs Road) and Ballan.</li> <li>• Encourage manufacturing and other heavy industries to establish in Maddingley (south of Kerrs Road) or Parwan.</li> </ul> <p>Clause 21.04-7 Further Strategic Work:</p> <ul style="list-style-type: none"> <li>• Investigate rezoning the Park Street Maddingley industrial precinct from Industrial 2 Zone to Industrial 3 Zone or Mixed Use Zone, to limit manufacturing and facilitate service industry and other compatible uses.</li> <li>• Investigate rezoning the Griffith Street Maddingley industrial precinct from Industrial 2 Zone to Industrial 3 Zone.</li> </ul> <p>In order to facilitate implementation of the strategies relating to Kerrs Road area, it is recommended that the following dot point be added under Clause 21.04-7 Further Strategic Work:</p> <ul style="list-style-type: none"> <li>• <u>Investigate rezoning industrial land to the north of Kerrs Road Maddingley from Industrial 2 Zone to Industrial 3 Zone.</u></li> </ul> <p>With respect to the Farming Zone land located east of the railway line: The UGF identifies this area as forming part of the 'future Maddingley employment investigation area' and states (on page 41) that:</p> <p><i>“Due to its proximity to industrial land uses, this area is unsuitable for sensitive uses. Further studies are required to identify appropriate future uses, future direction and planning controls.”</i></p> <p>No changes to the UGF text are considered necessary, as amenity buffers are only applicable to sensitive uses. The exclusion of future sensitive uses will ensure that future uses</p>

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				<p>are compatible with the buffer distances required by the existing uses at JBD Industrial Park.</p> <p>It is, however, recommended that the legend on plans 1, 4, 5, 7 and 8 be amended to state “future investigation area (no sensitive uses)”.</p> <p>In response to comments relating to MSS Clause 21.07-2, it is agreed that there should be greater recognition of and protection for existing industrial employment areas, such as the South Maddingley industrial precinct, the Maddingley Brown Coal and associated waste recovery facility and the Darley sand quarries.</p> <p>It is, therefore, recommended that Clause 21.07-2 be amended as follows: Add the following objective:</p> <ul style="list-style-type: none"> <li>• <u>To protect existing and future industrial and agribusiness land uses (particularly Maddingley Waste and Resource Recovery Hub, Darley/Coimadai sand quarries, South Maddingley industrial precinct south of Kerrs Road, Parwan Employment Precinct, Bacchus Marsh Aerodrome and Bacchus Marsh Recycled Water Plant) from the encroachment of sensitive land uses.</u></li> </ul> <p>Amend the last strategy as follows:</p> <ul style="list-style-type: none"> <li>• Provide <u>appropriate</u> separation between residential development <u>sensitive land uses and land uses</u> with off-site amenity impacts <del>such as the Maddingley Brown Coal Mine, industrial areas, the airport and the Parwan Waste Water treatment plant.</del></li> </ul>

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36	N/A APA	Comments only	<p>APA Group (APA) is Australia's largest natural gas infrastructure business and has direct management and operational control over its assets and investments. APA's gas transmission pipelines span across Australia, delivering approximately half of the nation's gas usage. APA owns and operates over 15,000 km's of high pressure gas transmission pipelines across Australia.</p> <p>APA is the Pipeline Licensee for the Brooklyn to Ballan Gas Transmission Pipeline.</p> <p><u>APA's Role:</u></p> <p>As a Licensee under the <i>Pipelines Act 2005</i> (VIC), APA is required to operate high pressure gas transmission pipelines (HPGTP) in a manner that minimises adverse environmental impacts and protects the public and property from health and safety risks. Once a HPGTP is in place, APA is required to constantly monitor both the pipeline easement and also a broader area within which we are required to consider land use changes and development and to assess what such changes means to the risk profile of the HPGTP.</p> <p>APA has a number of responsibilities and duties to perform under a complex framework of legislation, standards and controls across Federal, State and Local Government landscapes. In particular, our HPGTPs are required to be operated in accordance with Australian Standard 2885 (Pipelines – Gas and Liquid Petroleum) (AS2885). In discharging our regulatory responsibilities, APA needs to continuously review what is happening around its assets, what land use changes are occurring and what development is taking place to ensure it remains in a position to comply with applicable</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

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			<p>operational and safety standards and legislation whilst meeting its commercial obligations and imperatives.</p> <p><u>Pipeline Risk Profile and the Measurement Length:</u></p> <p>In managing HPGTP's and considering land use changes, APA must focus on that area geographically defined by AS2885 as the Measurement Length (ML). The ML area is the heat radiation zone associated with a full-bore pipeline rupture. APA is mandated to consider community safety in the ML due to the high consequences of pipeline rupture to life, property and the economy.</p> <p>The ML is determined by taking account a number of factors including the design criteria of the pipe (driven by the environment within which it was designed for at the time of construction) and the Maximum Allowable Operating Pressure (MAOP) of the pipe. APA must consider any changes of land uses within the ML area to determine the effect of a new use on the risk profile of the pipeline.</p> <p>For reference, the ML of the Brooklyn to Ballan Pipeline is 210 metres. Note that the ML is a radial dimension, and therefore applies to both sides of the pipe.</p> <p><u>Bacchus Marsh Urban Growth Framework:</u></p> <p>The Brooklyn to Ballan Pipeline runs within the Bacchus Marsh UGF boundary from KP34 to KP43. The location of the pipeline is shown in Figure 12. The pipeline runs primarily through the future Maddingley employment investigation area and the future Parwan employment growth precinct.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

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			 <p data-bbox="712 667 1048 683">Figure 1 - Location of APA's Brooklyn-Ballan Pipeline within the Bocches Marsh UGF</p> <p data-bbox="712 691 1281 751"><b>Figure 12:</b> Brooklyn to Ballan high pressure gas transmission pipeline</p> <p data-bbox="712 783 1361 903">The pipeline currently traverses the Farming Zone and part of the existing Industrial 1 Zone. It is understood that no changes to the zoning of the land will occur as a result of this Planning Scheme Amendment.</p> <p data-bbox="712 938 891 967"><u>Sensitive Uses:</u></p> <p data-bbox="712 999 1361 1214">APA seeks to limit sensitive uses from establishing within the ML so as to retain a high level of compliance with applicable safety standards. AS2885 defines a sensitive use as one which may increase the consequences of failure due to its use by members of the community who may be unable to protect themselves from the consequences of a pipeline failure.</p> <p data-bbox="712 1246 1335 1302">For completeness, APA's preferred position is that all land uses listed below be located outside of the ML:</p> <ul data-bbox="712 1310 1178 1406" style="list-style-type: none"> <li>• Aged Care Facilities.</li> <li>• Retirement villages.</li> <li>• Child care / family day care centres.</li> </ul>	<p data-bbox="1391 791 1570 820">This is correct.</p> <p data-bbox="1391 1007 2141 1158">The UGF and updated MSS clauses seek to ensure that no new sensitive land uses will be established within the PEP or the Maddingley Employment Investigation Area. Any potential future sensitive land uses will be at least approximately 2.0kms to the north of the Brooklyn to Ballan HPGTP.</p> <p data-bbox="1391 1190 2141 1374">EPA publication 1518 <i>'Recommended separation distances for industrial residual air emissions'</i> 2013 defines "sensitive land uses" as any land uses which require a particular focus on protecting the beneficial uses of the air environment relating to human health and wellbeing, local amenity and aesthetic enjoyment, for example residential premises, child care</p>

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			<ul style="list-style-type: none"> <li>• Cinema based entertainment facility.</li> <li>• Schools or other educational establishments.</li> <li>• Prisons / corrective institutions.</li> <li>• Hospitals and medical centres.</li> <li>• Place of assembly or worship.</li> <li>• Retail premises.</li> <li>• Service station.</li> <li>• Higher density residential uses.</li> <li>• Other uses, as determined by the relevant decision maker, as substantially used by community members unable to protect themselves from the consequences of pipeline failure.</li> </ul> <p>It is understood that the Parwan Employment Precinct is intended to be aimed towards facilitating vertically integrated agribusiness such as meat processing, feed lot/saleyards, mushrooms, poultry, hydroponics and associated co-located industries. APA supports uses of this nature, subject to specific details which will be provided at subsequent planning stage for the Parwan Employment Precinct and Maddingley Employment Investigation Area.</p> <p><u>Safety Management Study:</u></p> <p>AS2885 requires a Safety Management Study (SMS) to be undertaken whenever the location class of land within the ML changes. The purpose of an SMS is to assess the risk associated with a change in land use, including both construction risks and ongoing land use risks. The SMS will also develop appropriate controls to reduce risks to 'as low as reasonably practicable' (ALARP).</p>	<p>centres, pre-schools, primary schools, education centres or informal outdoor recreation sites.</p> <p>It is noted that a number of the land uses referred to in APA's submission go beyond the above definitions of sensitive land uses. It is therefore recommended that the UGF and Plans 1 and 4 be amended to show the location of the Brooklyn to Ballan HPGTP, and to note the types of uses that should not be permitted within 210m either side of the pipeline.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted. This is a sensible approach. It is, however, recommended that the UGF be amended to include the</p>



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			<p>The Urban Growth Framework is a higher level document and not sufficient to determine whether a change of location class or any other potential threats to the pipeline will eventuate. APA will determine whether an SMS is required during subsequent stages of precinct planning for both the Parwan Employment Precinct and the Maddingley Employment Investigation Area.</p> <p>The cost of undertaking an SMS is to be borne by the proponent as the 'agent of change'. APA has developed a list of preferred SMS facilitators. This ensures facilitators are both independent and satisfactorily qualified to undertake this assessment. This list is available from APA on request.</p> <p><u>Comments:</u></p> <p>The Ballan to Brooklyn Pipeline is recognised in Section 7.4 of the Bacchus Marsh UGF Background Report, however, it is not shown as an image nor is it referenced anywhere within the Bacchus Marsh UGF itself or within the proposed LPPF.</p> <p>Clause 19.03-6 (Pipeline Infrastructure) of the Moorabool Planning Scheme identifies the following strategy:</p> <ul style="list-style-type: none"> <li>Recognise existing transmission-pressure gas pipelines in planning schemes and protect from further encroachment by residential development or other sensitive land uses, unless suitable additional protection of pipelines is provided.</li> </ul> <p>Although APA understands that the purpose of the amendment is strategically focused and subject to</p>	<p>following additional precinct planning principle for the PEP (on page 76):</p> <ul style="list-style-type: none"> <li>Consider the need for a Safety Management Study in relation to the Brooklyn to Ballan high pressure gas transmission pipeline, in consultation with APA.</li> <li>Determine any land uses which should be prohibited within 210m either side of the Brooklyn to Ballan high pressure gas transmission pipeline, in consultation with APA.</li> </ul> <p>Refer to comments above regarding recommended amendments to the UGF.</p> <p>Noted. Refer to comments below.</p>

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			<p>further work, it is submitted that the pipeline may be a significant constraint that must be considered during the development of the precinct. This is particularly the case for future road layouts, utility networks and also certain types of uses which may have modify the risk profile of the pipeline (either through creating new threats, or increasing the implication of existing managed risks).</p> <p><u>Recommendations:</u></p> <p>APA submits the following amendments should be made to Amendment C81:</p> <ol style="list-style-type: none"> <li>1. Amend the Bacchus Marsh UFG document to include “gas transmission infrastructure” within the list of physical constraints.</li> <li>2. Amend proposed Clause 21.07-2 to incorporate the following strategy: <ul style="list-style-type: none"> <li>• Ensure that land use and development within the Parwan Employment Precinct shown on the Bacchus Marsh Urban Growth Framework Plan is compatible with: <ol style="list-style-type: none"> <li>a. The continued operation and protection of the Brooklyn to Ballan High Pressure Gas Transmission Pipeline.</li> </ol> </li> </ul> </li> </ol> <p>APA understands that significant future work is required for the Parwan Employment Precinct and Clause 21.08-8 identifies that much of this will be addressed through the preparation of a Precinct Structure Plan. In the longer term, it is understood that future investigations will be undertaken for the Maddingley investigation area. APA looks forward to engaging with both Council and the Victorian Planning Authority at that subsequent stages for both of these precincts to ensure</p>	<p>Agreed. It is recommended that the UGF be amended to include “gas transmission infrastructure” within the list of physical constraints on page 65.</p> <p>Agreed. It is recommended that the exhibited Clause 21.07-2 be amended by the addition of the following strategy: <ol style="list-style-type: none"> <li>a. Ensure that land use and development within the Parwan Employment Precinct shown on the Bacchus Marsh Urban Growth Framework Plan is compatible with the continued operation and protection of the Brooklyn to Ballan High Pressure Gas Transmission Pipeline.</li> </ol> </p> <p>Noted.</p>

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			development is undertaken in a safe and efficient manner.	

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37	Lot 12 Streeton Drive and Lot 109 Flanagans Drive, Merrimu	Supports amendment subject to changes	<p>Our client is the owner of the following properties:</p> <ul style="list-style-type: none"> <li>• Lot 12, Streeton Drive, Merrimu (Streeton Drive land).</li> <li>• Lot 109, Flanagan's Drive, Merrimu (Flanagan's Drive land).</li> </ul> <p>Please accept this advice as a submission to the Amendment seeking limited changes to the wording of Clause 21.07-2 of the Moorabool Planning Scheme.</p> <p><u>Subject land:</u></p> <p>The Streeton Drive land comprises approximately 3ha of land. It is currently vacant, with housing being developed on lots to the north and west, accessed from Streeton Drive. It is predominately flat land and does not contain significant vegetation. The Flanagan's Drive land comprises 35.28ha of land. This land is also currently vacant however is located within an area being developed for residential dwellings, with housing fronting Flanagans Drive and Lindsay Avenue to the east and north of the site. The topography is varied with land rising within the central part of the site.</p> <p><u>Bacchus Marsh District Urban Growth Framework:</u></p> <p>We have reviewed the Bacchus Marsh District UGF and are supportive of the strategic plan for the area, and in particular, the nomination of the Merrimu area, including the Streeton Drive and Flanagan Drive properties within the 'future residential growth precinct'.</p> <p>This is a logical future use of the land in this area, in recognition of:</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

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			<ul style="list-style-type: none"> <li>• The emerging residential growth pressures for Bacchus Marsh, and more generally within Victoria.</li> <li>• Planning policy supporting peri-urban areas as opportunities for alternative housing choice and to contribute to housing affordability.</li> <li>• The land is constrained from being able to be used for productive agricultural use, given the poor soil conditions; lack of water availability; and significantly more productive land located within the irrigation district to the south.</li> <li>• The existing and emerging residential character of the area including nearby housing on both Streeton and Flanagan Drives.</li> <li>• The lack of other significant constraints including separation from industry and associated buffer areas and separation from key bushfire prone areas.</li> </ul> <p>We also support the relocation of the future 'ELR' further to the west within the precinct, from earlier drafts of the UGF, subject to a further planning investigation. This appears to be a more logical and practical location for a key linkage road given the significant constraints of topography as shown in the earlier version (January 2017).</p> <p><u>Changes to the MSS:</u></p> <p>We support the key changes proposed as part of Amendment C81 to the MSS, including:</p> <ul style="list-style-type: none"> <li>• Recognition of the support in Plan Melbourne and the Central Highlands Regional Growth Plan as being suitable for increased residential growth given</li> </ul>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Bushfire risks and constraints will need to be determined via future detailed investigation prior to the preparation of a PSP. Refer to the CFA's submission (number 49) and Council officer response.</p> <p>The submitter has misinterpreted the UGF. The UGF does not indicate the location of the future 'ELR' further to the west within the precinct. The UGF merely notes the need for an ELR planning study, to determine the location of the road corridor. As discussed above, VicRoads has only recently begun this significant body of work which is expected to take approximately 2-3 years to complete.</p> <p>Noted.</p>

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			<p>its regional service role and relative accessibility to Melbourne, Geelong and Ballarat.</p> <ul style="list-style-type: none"> <li>• To maintain an adequate long term land supply to accommodate projected populations.</li> <li>• To direct growth to preferred locations including the Merrimu area.</li> </ul> <p>We consider however the residential opportunities within the Merrimu area should be nominated as 'medium term' rather than 'long term', given the clear demand and projected population growth and the options for owners or developers to ensure earlier delivery of services.</p> <p>We note that the proposed MSS at Clause 21.07-2 Objective – Managing Urban Growth, recognises the medium term opportunity for residential growth within Merrimu, particularly if the ELR is facilitated (third dot point in strategies), however refers to the long term opportunity in the objectives. We consider that the objective should also reflect the medium term opportunity.</p> <p>This would also be consistent with the timing within the UGF, Table 3 UGF Actions (p.86 draft 26/10/2017), nominating the rezoning and PSP for the Merrimu Residential Growth precinct to be medium to long term, and that the timing can be bought forward if there are significant contributions to the ELR construction funding. In this table medium term is nominated as 5-10 years; and long term 10+ years.</p> <p>Overall, our client supports the work undertaken by Council and the VPA and the recognition of the Merrimu area as a future residential growth precinct. Our client</p>	<p>Timing of Merrimu residential growth precinct:</p> <p>The UGF states (in Table 5 - Sequencing; page 89-91) that the timing for the Bacchus Marsh existing urban area is short term. Timing for Merrimu and other residential growth precincts is stated to be medium to long term, but sequencing can be brought forward if supported by sufficient assessments. The UGF also states that timing is dependent on land supply and demand analysis in the first instance, but sequencing should be brought forward if the precinct can demonstrably deliver the ELR. Medium term is stated to be 5-10 years, while long term is 10+ years.</p> <p>There is, however, an error in the exhibited MSS Clause 21.07-2, as the objective relating to Merrimu, Parwan Station and Hopetoun Park is inconsistent with the relevant strategy, and is also inconsistent with the timing expressed in the UGF.</p> <p>It is therefore recommended that the objective under Clause 21.07-2 be amended as follows:</p> <ul style="list-style-type: none"> <li>• To accommodate <u>medium to long</u> term residential growth within the investigation areas at Merrimu, Parwan Station and Hopetoun Park.</li> </ul> <p>The timing expressed in the UGF with respect to the urban growth precincts is intended to refer to the timing for a planning scheme amendment to rezone land and incorporate a precinct structure plan where relevant. Medium to long term</p>

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			<p>requests that the terms of the Amendment are varied by the following manner:</p> <p>Clause 21.07-2 Objective – Managing urban growth:</p> <ul style="list-style-type: none"> <li>• To accommodate sustainable residential growth within the existing settlement boundary of Bacchus Marsh in the short to medium term.</li> <li>• To accommodate medium to long term residential growth within the investigation areas at Merrimu, Parwan Station and Hopetoun Park.</li> </ul> <p>Subject to the above changes, our client supports the provisions of Amendment C81.</p>	<p>timing is considered appropriate for Merrimu, for the following reasons:</p> <ul style="list-style-type: none"> <li>• The adopted housing strategy titled ‘Housing Bacchus Marsh to 2041’ (dated 2017) as amended by more recent growth analysis (Spatial Economics, 2017) concludes that there is around 18-20 years of broad hectare supply (with 14 years under a 4.2% growth rate). This means there is no short term imperative to act on Merrimu.</li> <li>• The ELR corridor planning study, which has recently been commenced by VicRoads and is expected to take approximately 2-3 years to complete. It is crucial that the road alignment be confirmed prior to the preparation of any future PSP or planning scheme amendment.</li> <li>• Council will need to undertake a range of complex strategic work for the whole Bacchus Marsh District to give guidance for growth planning within Bacchus Marsh district as a whole. This work needs to be undertaken prior to the preparation of any individual future PSP or planning scheme amendment, including: <ul style="list-style-type: none"> <li>○ Integrated infrastructure delivery framework (which addresses all higher order infrastructure needs and means of delivery to inform PSP DCPs and ICPs).</li> <li>○ Integrated Water Management Plan (providing principles to address a range of sustainable water management priorities within the district).</li> <li>○ District Open Space Framework (this is a 2018/19 budget bid and is already in the UGF), to address key principles to protect escarpments, achieve biolinks, integrate open space outcomes with waterway management etc.</li> <li>○ Undertake traffic modelling to identify the maximum number of lots which can be developed in each growth precinct prior to the ELR being constructed,</li> </ul> </li> </ul>

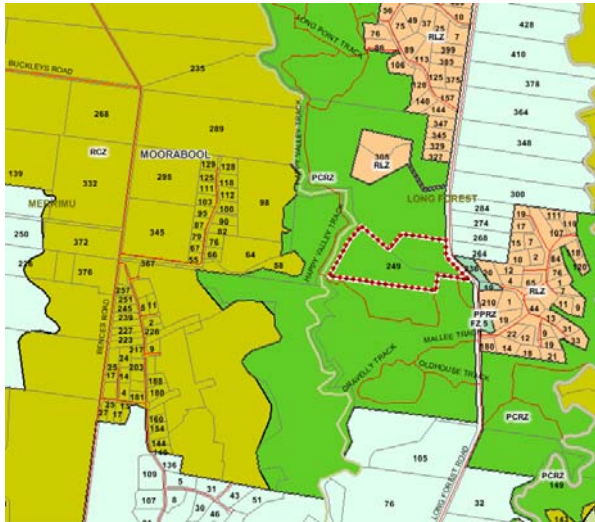
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				<p>and the local road network improvements necessary to facilitate such development.</p> <ul style="list-style-type: none"> <li>○ Update the Bacchus Marsh Integrated Transport Strategy, to include consideration of the Bacchus Marsh Urban Growth Framework.</li> <li>• Proponents of development in this precinct will need to undertake a range of technical studies relating to each precinct and surrounds, such as biodiversity, bushfire risk, cultural and European heritage, integrated transport, infrastructure, etc.</li> </ul> <p>It is recommended that the UGF be amended, to more clearly articulate the above as pre-conditions for the preparation of any future PSP or planning scheme amendment, and to allow for consideration of earlier timing for PSPs if these pre-conditions are met and if the precinct can demonstrably deliver the applicable sections of the ELR (i.e. Merrimu for the northern component and Parwan Station for the southern component).</p>



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38	Darley Plaza; 151 Gisborne Rd, Darley	Supports amendment	On behalf of our clients, we wish to confirm their support of action item 17 insofar as we are actively investigating the re-development opportunities of the Darley Plaza site as presented to us by Council in their Darley Activity Centre Urban Design Investigation report dated May 2016.	Noted. Action item 17 that the submitter refers to is listed in Table 4 (page 87) of the UGF. The project is listed as:  Urban Design Framework: <ul style="list-style-type: none"> <li>• Bacchus Marsh Town Centre</li> <li>• Darley Plaza.</li> </ul> The stated timeframe for delivery of this project is short term.
39	4 Atley Street, Bacchus Marsh	Does not support amendment	<p>As a resident of Bacchus Marsh, I write this submission to express my grave concern of the draft Bacchus Marsh Urban Growth Framework.</p> <p>Firstly, I have chosen Bacchus Marsh as my home due to its rural attributes country lifestyle. I appreciate the Bacchus Marsh Township for its market gardens, extensive farmland and community support. I understand that growth is inevitable in all capital cities and towns however I do not agree that growth should be encouraged by the State government into a small country township that also happens to be one of Victoria's important food bowls. Why is growth being directed into Bacchus Marsh when there are so many other growth fronts on Melbourne's fringe and in Victoria's major regional cities?</p> <p>As you would be aware, Bacchus Marsh is in very close proximity to the expansive Melton growth area that provides hectares upon hectares of urban land that is not likely to be fully developed for decades to come. Similarly, the Wyndham growth area is also in close proximity to Bacchus Marsh and is in ample supply of urban land.</p> <p>In addition, Ballarat and Geelong, both regional towns, and also in close proximity to Bacchus Marsh have</p>	<p>Plan Melbourne 2017 and the relevant Regional Growth Plans set the state planning policy context for urban settlement across Victoria. Together they identify a diverse range of urban growth contexts to provide housing and locational choice. They nominate growth opportunities in metropolitan Melbourne, regional cities, and key strategic centres across Victoria.</p> <p>Bacchus Marsh was identified in Plan Melbourne 2017 and the Central Highlands Regional Growth Plan as a peri-urban regional centre, capable of supporting growth and providing an alternative to metropolitan living.</p> <p>The preparation of the Bacchus Marsh UGF has been guided by a strong objective to protect the ongoing viability of the Bacchus Marsh Irrigation District as a state-significant resource, and to provide a robust framework to manage the strong demand for growth, to preserve the contained, peri-urban character of Bacchus Marsh.</p>

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			<p>large designated growth areas that will provide countless homes to future populations wishing to live in regional cities.</p> <p>Recently on 13 December 2017, the State government through a media release announced that the Planning Minister will introduce a Bill into Parliament to protect the Macedon Ranges region from inappropriate development. Part of this legislation would include settlement boundaries around the country towns of Gisborne, Kyneton, Romsey, Riddles Creek, Lancefield and Woodend.</p> <p>The media release also outlined that the Bill would provide a model for how other parts of Victoria can be protected from inappropriate development.</p> <p>How can the State government justify protecting the Macedon Ranges region from inappropriate development, but have no issue with supporting intensive urban development in Bacchus Marsh, a township with very similar attributes and functions to those in the Macedon Ranges?</p> <p>If we do not protect places like Bacchus Marsh that are so integral to providing Victorians with fresh fruit and vegetables, where will Victoria get its fresh food from?</p> <p>There have been recent examples of important township areas that once provided fresh fruit and vegetables such as Clyde and Werribee South that have been rezoned and are now subject to urban development. This shows that Victoria's food bowl areas are getting smaller in size, and makes a case of</p>	<p>The Bacchus Marsh Urban Growth Framework represents a consistent approach to managing growth in peri-urban communities with the Macedon Ranges example cited. Importantly, both the legislation and the Localised Planning Statement for the Macedon Ranges (currently subject to community consultation) provide for limited, managed growth in strategically appropriate locations across the region.</p> <p>Much like Bacchus Marsh, Gisborne and Kyneton have both been identified as a peri urban regional centres for controlled growth in both Plan Melbourne and the Loddon-Mallee South Regional Growth Plan.</p> <p>The Bacchus Marsh UGF is considered to be a balanced approach to managing growth, and protecting the ongoing viability of the Bacchus Marsh Irrigation District, and the landscape, environmental and character values of the existing town.</p> <p>See above</p> <p>See above</p>

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			<p>why it is so important to protect the food bowl regions we have left, such as Bacchus Marsh.</p> <p>I acknowledge that the irrigation district in the Urban Growth Framework is shown, however it is the encroaching urban development completely surrounding it that will place undue pressure on this irrigation district (the food bowl).</p> <p>In addition to the above, if the urban development occurs to the extent the growth plan shows how will the Western Freeway cope with the increased traffic? The Western Freeway is currently substandard, especially from Melton to Deer Park – how will it cope with the traffic generated by the future growth in the Melton corridor and the future Bacchus Marsh corridor?</p> <p>Overall, the liveability of Bacchus Marsh will be diminished and the attraction of its rural setting will be ruined by the suburbanisation of Bacchus Marsh into the future.</p>	<p>See above</p> <p>There will need to be progressive upgrades to the Western Freeway to respond to growth all the way along the broader corridor extending from Melbourne to Ballarat. The UGF identifies a series of potential projects to improve access to the Western Freeway from Bacchus Marsh and the designated growth areas. It is important for long term growth strategies such as the UGF to clearly articulate future growth, so that TfV (VicRoads) can prepare long term strategies for improvements to the broader Western Freeway corridor with an accurate, long term growth context.</p>

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40	249 Long Forest Road, Long Forest	Comments only	<p>We own approximately 44 acres of land on two lots at 249 Long Forest Road, Long Forest. This land has been mistakenly zoned as PCRZ for over 15 years. The error was made by Moorabool Council in the period 1997-2000.</p> <p>The zoning is a nonsense because our land is privately owned, and therefore not Public Conservation or Resource Land.</p> <p>We first notified Council of this mistake in 2004, and have requested rectification on dozens of occasions since. The CEO of Council admitted the error in writing, and stated that the matter would be rectified over 13 years ago. It is still not rectified.</p> <p>Not only is the land incorrectly zoned, it appears as public land on many maps – a blatant error, which you have now perpetuated on your maps in the Urban Growth Framework. You have depicted our land as “public park”.</p> <p>Plan 1 C 81 maps shows our private land as part of the public land of Long Forest Conservation Reserve (green on the map). All other privately owned Long Forest Road is hatched, and labelled correctly as “existing rural residential”.</p> <p>This incorrect presentation will lead people to believe there is a greater area of public land in that location than there actually is. This could have significant effects on people’s responses to your planning proposal. They may believe the Long Forest Conservation Zone is more robust than it actually is.</p>	<p>The planning map below (Figure 13) confirms that the subject property is currently incorrectly zoned PCRZ. Council officers are well aware of this issue which has a lengthy history, however, the correction of the zoning error is beyond the scope of Amendment C81.</p>  <p><b>Figure 13:</b> Zone map, showing the subject property delineated in red.</p> <p>The Bacchus Marsh Framework Plan in Clause 21.07 of the planning scheme notes that the property is incorrectly zoned PCRZ and should be rezoned to RCZ. Given that the property is heavily vegetated, RCZ is considered the most appropriate zone.</p> <p>Council officers wrote to the owners in 2014, asking if they wished to have their property rezoned to Rural Conservation</p>

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			<p>Three are two further consequences. Firstly, people may enter our land at any time, believing it to be public land. We have recently had a number of burglaries, and we attribute this to the fact that the land appears as public land on official maps.</p> <p>The second very serious concern for us is the fact that we are trying to sell that land. The potential buyers are naturally anxious about the incorrect zoning. Council has recently assured us the land will be zoned private in February or March 2017. The removal of the nonsensical PCRZ is crucial to the sale of our land.</p> <p>Unfortunately, the incorrect map in the Urban Growth Framework documents has now compounded Council's errors by clearly labelling our land as "public park". This error trumps previous mistakes, and may well make our potential purchasers apprehensive.</p> <p>There is no excuse for this error. We request you amend your maps immediately and provide a correction to us in writing as a matter of urgency, as well as a public explanation, so that we can reassure our potential buyers.</p>	<p>Zone (RCZ), as part of an anomalies/corrections amendment (C70) to the Moorabool Planning Scheme.</p> <p>However, the owners responded in writing, requesting that the property be removed from any process that would rezone the land to other than Rural Living Zone. Consequently, the property was excluded from amendment C70.</p> <p>Council officers are currently in the process of preparing another anomalies/corrections amendment which will include the subject property.</p> <p>It is acknowledged that the subject property is incorrectly depicted as public land on Plans 1, 3, 4, 6 and 8. The land status on these plans was derived from the planning zone maps.</p> <p>It is therefore recommended that Plans 1, 3, 4, 6 and 8 be amended in the UGF, to show the subject property as 'existing rural residential'. As described in Planning Practice Note 37, 'rural residential' development refers to land in a rural setting, used and developed for dwellings that are not primarily associated with agriculture.</p> <p>It is also recommended that the exhibited MSS Clause 21.07 be amended by inserting the updated Plan 1 Urban Growth Framework map on page 11.</p>

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41	128 Possumtail Run, Merrimu	Supports amendment subject to changes	<p><u>Overall:</u></p> <p>We would like to congratulate Council for preparing a comprehensive, long term strategy, rather than allowing piece meal, incremental and unplanned growth of Bacchus Marsh. Greater Melbourne will have a large population growth in the decades ahead and while many of us would like to see the Bacchus Marsh area remain as it is, that is probably true for so many other parts of the state too and people need to live somewhere. Growth of the Bacchus Marsh township is probably inevitable, therefore it's important to have a long term, robust vision to guide this growth, rather than pretending it's not happening.</p> <p><u>Service Provision:</u></p> <p>While we would hope and expect Bacchus Marsh to remain the primary location for the provision of Government, municipal and commercial services we think it is important that provision be made for a range of local shopping and other services in Merrimu. As the population grows in the Merrimu area this will be very important for the quality of life for us and other residents living in the area and we strongly support this aspect of the plan.</p>	<p>Noted.</p> <p>Noted. Plan 1 in the UGF denotes a potential activity centre and retail for the Merrimu precinct. General strategies relating to retail (page 44) include the following (amongst others):</p> <ul style="list-style-type: none"> <li>• Plan for activity centres in accordance with the activity centre hierarchy for Bacchus Marsh and ensure sufficient commercially zoned land.</li> <li>• Ensure activity centres are delivered in early stages, co-located with community facilities and, where applicable in each stage plan for new growth areas.</li> </ul> <p>The precinct description for Merrimu precinct in the UGF (page 71) includes the following statement:  “Merrimu’s anticipated population will create large-scale demand for activity centres and community facilities. This should be leveraged to deliver local jobs, including retail employment opportunities and jobs in health and community.  .....”</p>

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			<p><u>Traffic:</u></p> <p>The biggest problem facing residents in rapidly growing areas of Melbourne (and our greatest concern about future development) is traffic congestion on the main roads that take people to freeways and public transport hubs. This has a crushing impact on their lives. It is not uncommon in peak times for people to spend 30 to 40 minutes waiting on a feeder road to get onto the Freeway in situations where walking that distance would take 10 minutes. This has a major impact on people's ability to work and spend time with their families. We would support a Special Rate to construct roads to make sure feeder roads keep up with the population expansion. Presumably this would not have popular support but at very least the detailed planning should set out a clear strategy for the roll-out of new infrastructure to support carefully managed, staged development.</p> <p><u>Possumtail Run Area:</u></p> <p>We submit that there does not appear to be any physical constraints unique to the Possumtail Run area that would be the basis of these lots being excluded</p>	<p>The precinct planning principles (page 72) include the following (amongst others):</p> <ul style="list-style-type: none"> <li>• Plan for a self-contained town centre with community facilities and significant local employment opportunities.</li> <li>• Nominate activity centres as per hierarchy and locate based on walkable catchments.</li> </ul> <p>As per the response to submission 2, transport is one of the key elements of the UGF.</p> <p>The exhibited MSS Clause 21.05-3 (Integrated transport) lists a number of objectives and strategies which will ensure the delivery of 'integrated transport' within and beyond the new growth precincts. Clause 21.05-4 includes an objective <i>"to provide appropriate levels of community facilities and infrastructure ...."</i>. It also includes a strategy to <i>"require new development to make financial contributions to the provision of community facilities and infrastructure, such as roads, bicycle paths, footpaths, public transport, ....., via development contribution plans or infrastructure contribution plans"</i>.</p> <p>Future planning scheme amendments will be required to rezone land and to implement PSPs or development plan requirements. Infrastructure provision will be a key requirement of any PSP or development plan. Any PSP or development plan will need to be supported by an 'integrated transport plan', acceptable to both Council and VicRoads.</p> <p>Disagree. As stated in the UGF (page 71), " ..... some existing estates such as Dodemaide Court and Possum Tail Run are subject to covenants limiting future growth. These areas can be expected to remain as lifestyle lots".</p>

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			<p>from the ultimate settlement boundary (as shown in Plan 1 Urban Growth Framework, Bacchus Marsh District Urban Growth Framework and background report).</p> <p>It appears as though the area has been excluded solely on the basis that it has been developed for rural-residential 'lifestyle lots. This is understandable, and there would likely be some local resistance to development in the area. However this is a long term strategy, and it would therefore be an oversight if the strategy did not acknowledge the long term capacity of this area, much like other rural residential areas consumed by urban growth, to support more intensive development.</p> <p>Indeed, pressure for further development in this area is inevitable - an island of 10,000 square meter blocks in a sea of what will presumably average 500 square meter blocks will be somewhat incongruous. The framework plan should therefore acknowledge the development potential for this area, and set the parameters to guide any future strategic planning for the development of this area. Such development will be long term, and will necessarily be much more detailed than the broad master planning for Merrimu and would be able accommodate particular issues at the time. It will need to have regard for the shared responsibilities to upgrade existing local roads, local subdivision design to respond to existing dwelling locations, and other considerations to protect the amenity of existing residents as the area transitions but none of those issues would be insurmountable.</p> <p><u>Summary:</u></p>	<p>These estates also provide an important low density interface with the adjoining Long Forest Nature Conservation Reserve, with its inherent biodiversity values and bushfire risk.</p> <p>Also, as noted in response to submission 24, it needs to be emphasised that the future growth precincts are essentially investigation areas. Future PSPs will need to respond to the findings of further detailed technical investigations (e.g. environmental values/risks, heritage values, infrastructure). Future urban zone boundaries will need to respond to any additional constraints identified in the further detailed technical investigations.</p>



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			<p>In conclusion we ask that Council:</p> <ul style="list-style-type: none"> <li>• develop a clear plan to ensure road (and other) infrastructure keeps up with population growth.</li>   <li>• include the Possumtail Run area in the ultimate settlement boundary.</li> </ul>	<p>Refer to comments above regarding integrated transport. With regard to other infrastructure, the exhibited MSS Clause 21.05-4 (community facilities and infrastructure) lists a number of objectives and strategies which will ensure the delivery of education and health services, and long-term water supplies.</p> <p>Disagree, for the reasons stated above.</p>

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42	52 Graham Street, Bacchus Marsh	Comments only	As a member of the Tracks & Trails Advisory Committee to Council it is specifically requested that linkages of WALKING & CYCLING TRACKS are part of the specifics addressed when considering these satellite residential zones. Whilst it appears that, to an extent, they will be designed as "stand alone" communities, clearly it is important that safe access routes for walking and cycling are considered and this may well not be by simply putting a shared footpath alongside a road but there may be opportunities for completely separate walking and cycling tracks to be developed offering either more direct, safer or more visually interesting access between parts of the expanded community.	<p>The future PSP or development plan for each growth precinct will need to include an integrated transport plan which would include provision for walking and cycling, and connectivity with the existing urban area.</p> <p>The exhibited MSS Clause 21.05-3 includes the following objective which is considered appropriate and does not require amendment:</p> <ul style="list-style-type: none"> <li>Require the provision of bicycle and pedestrian networks in new residential developments, with appropriate links to existing networks.</li> </ul> <p>It is recommended that the UGF be amended as follows, to more clearly articulate the desired outcome:</p> <p>Element 4: Transport: Key Issues – Walking and cycling:</p> <p>“Safe and efficient connections are key to encouraging walking and cycling as alternative travel modes. Gaps in existing areas should be closed to facilitate continuous movements between key destinations. New suburbs should provide fully integrated walking and cycling networks, particularly in and around open space and activity centres, <u>and also connecting new growth areas to each other and to the existing Bacchus Marsh urban area.</u>”</p> <p>Transport objectives (no change necessary):</p> <ul style="list-style-type: none"> <li>Facilitate walking and cycling as viable travel modes.</li> </ul> <p>Transport strategies – Walking and cycling:</p> <ul style="list-style-type: none"> <li>Improve existing and provide new pedestrian and cycling connections to provide complete networks for movement, <u>linking to key destinations such as Bacchus Marsh Main</u></li> </ul>

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				<p>Street and <u>other activity centres</u>, the Bacchus Marsh Train Station, the future Parwan Train Station, new bus <u>interchanges, schools, community facilities and open space</u>.</p> <ul style="list-style-type: none"> <li>• <u>Plan for integrated pedestrian and cycling networks within new growth areas, between growth areas, and between new growth areas and the existing Bacchus Marsh urban area.</u></li> </ul> <p>The implementation section of the UGF includes the following relevant actions:</p> <p>Table 3 – Key growth actions – state/regional:</p> <ul style="list-style-type: none"> <li>• Ref. No. 4: District Open Space Framework to inform future growth planning.</li> </ul> <p>Table 4 – Key growth actions – local:</p> <ul style="list-style-type: none"> <li>• Ref. No. 26: Update Recreation and Leisure Strategy incorporating updated Hike and Bike Strategy.</li> <li>• Ref. No. 28: Waterways/creek corridors study to determine rehabilitation, conservation and open space projects including active recreation and cycleway linkages.</li> </ul>

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43	7 McGregor Court, Bacchus Marsh	Comments only	<p>I would like the following to be considered for inclusion in the Bacchus Marsh Urban Growth Framework:</p> <p><u>Environment:</u></p> <p>Show wildlife corridors, e.g. along rivers, creeks, through undeveloped land. With a large population in Merrimu abutting Long Forest Nature Conservation Reserve, that reserve will need further protection, e.g. against dumping, cats, vehicles and generally higher usage.</p> <p><u>Transport:</u></p> <p>Show plan to link new developments to BM town centre and through to adjacent towns, including with walking/cycling routes.</p> <p>Show plan to extend open space links along major rivers to both gorges and to Melton reservoir.</p>	<p>Refer to response to submission 24.</p> <p>As per the response to submission 2, transport is one of the key elements of the UGF.</p> <p>The exhibited MSS Clause 21.05-3 (Integrated transport) lists a number of objectives and strategies which will ensure the delivery of 'integrated transport' within and beyond the new growth precincts. Clause 21.05-4 includes an objective <i>"to provide appropriate levels of community facilities and infrastructure ...."</i>. It also includes a strategy to <i>"require new development to make financial contributions to the provision of community facilities and infrastructure, such as roads, bicycle paths, footpaths, public transport, ....., via development contribution plans or infrastructure contribution plans"</i>.</p> <p>Future planning scheme amendments will be required to rezone land and to implement PSPs or development plan requirements. Infrastructure provision will be a key requirement of any PSP or development plan. Any PSP or development plan will need to be supported by an 'integrated transport plan', acceptable to both Council and VicRoads.</p>

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			<p><u>Other:</u></p> <p>A station at Parwan seems highly unlikely given its limited collection area. There would be many more likely new stations along the Ballarat line. Giving people there easier access to BM station would be better, including with walking/cycling routes. Otherwise it'll turn into a decades-long unfulfilled promise.</p>	<p>Refer to response to submission 42 in relation to walking and cycling.</p> <p>Disagree. As per the response to submission 27, the Parwan Station growth precinct provides an opportunity for transit-oriented development, serviced by a future railway station. There is potential to provide a future bus network linking the Merrimu growth precinct to a future Parwan railway station, via the future ELR.</p> <p>TfVs submission (see submission No. 44) states that "While Bacchus Marsh Railway Station will adequately service residents of Bacchus Marsh for a significant period of time, TfV supports investigating the potential for a station at Parwan in the long term".</p>

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44	N/A  Transport for Victoria (TfV)	Comments only	<p>TfV takes an integrated approach to planning, coordination and management of Victoria's transport system. Integral to TfV's agenda is the improvement of productivity and liveability through integrated transport and land use planning.</p> <p>TFV along with VicRoads has reviewed Amendment C81. The following submission is informed by feedback from across the transport portfolio. TfV has also contributed feedback to Amendment C79. Given parts of Amendments C79 and C81 complement each other, TfV will also briefly refer to Amendment C79 in this submission.</p> <p>Broadly, TfV supports the emphasis Amendment C81 places on developing walking and cycling links within Bacchus Marsh, and improving access to public transport. Doing so aligns with the <i>Transport Integration Act 2010</i> objective to provide an integrated and sustainable transport system that contributes to an inclusive, prosperous and environmentally responsible Victoria.</p> <p>However, TfV notes that previous feedback provided to Moorabool Shire on the Bacchus Marsh Urban Growth Framework (UGF), the strategy underpinning Amendment C81, is not acknowledged in the Explanatory Report. Some of those previously raised concerns remain, and as such, are reiterated below.</p> <p><u>ELR:</u></p> <p>The UGF makes multiple references to planning future growth areas in order to leverage infrastructure</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

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			<p>contributions towards the delivery of the ELR. TfV supports this approach.</p> <p>However, TfV remains concerned Moorabool Shire is relying heavily on the Eastern Link as a 'silver bullet' to address many of the transport-related problems in Bacchus Marsh, particularly in the UGF. TfV supports a multi-pronged approach to addressing congestion issues in Bacchus Marsh. This approach is more apparent in Amendment C81.</p> <p>TfV support's the elements of Amendment C81 that aim to direct future growth in Bacchus Marsh in a way that will leverage existing transport networks, development patterns, and activity centres. TfV supports those elements of clauses 21.03-2 and 21.03-3 which seek to prioritise infill development and higher densities close to activity centres and public transport nodes. Clauses 21.03-2 and 21.03-3 also support TfV's recommendation to nominate precincts 30, 31, and 32 as 'Increased Residential Growth' areas in Amendment C79.</p>	<p>Noted.</p> <p>Noted.</p> <p>The Bacchus Marsh Housing Strategy that was exhibited with Amendment C79 identifies character precincts 30, 31, and 32 as 'natural residential growth areas'. TfV's response to Amendment C79 states the following in regard to these precincts:</p> <p><i>"Amendment C79 clause 21.07 nominates a number of precincts in close proximity to Bacchus Marsh Railway Station as areas of 'Natural Residential Growth' or 'Minimal Residential Growth'. TfV is of the view this represents a missed opportunity to capitalise on upcoming rail transport improvements and promote sustainable neighbourhoods within a short walk of Bacchus Marsh Railway Station. TfV is of the view precincts 30, 31, and 32 would be appropriate locations to encourage higher density housing, and should be nominated as 'Increased Residential Growth' areas, taking into consideration proximity to an operating rail line with the potential future expansion of facilities, such as car parking and bus / coach interchange."</i></p> <p>While these three precincts are well located with respect to public transport, they should not be nominated for increased</p>

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			<p>TfV also supports elements of clause 21.05-3 around linking residential developments with activity centres and Bacchus Marsh Railway Station with quality and safe pedestrian and cycling networks. These strategies will allow the number of people accessing the town centre and train station to continue to grow, with a proportionally smaller impact on traffic congestion.</p> <p>Clause 21.05-1 identifies both construction of the ELR and facilitation of active transport commuting as priorities. However, Amendment C81 fails to acknowledge the multimodal opportunity presented by the ELR, and provides very little detail on how the ELR will contribute to transport integration and sustainability.</p> <p>The continued reliance on car-based transport and lack of sustainable transport options will only exacerbate existing traffic congestion in and around Bacchus Marsh. Given the ELR is a new arterial, there is significant opportunity to integrate high quality bus and bicycle transport, as well as catering to car and truck traffic. Providing capacity for separated bus and bicycle lanes from day one would cost less than retrofitting the road in the future.</p> <p>Further, ELR has the potential to operate as a high-speed bus and bicycle corridor servicing the Bacchus Marsh town centre and Bacchus Marsh Railway Station, or a potential future station at Parwan. Again, this would allow the number of trips to the town centre and train</p>	<p>residential growth as they are within the 2km buffer from the composting operations at the Maddingley Brown Coal mine and waste management hub. Also, a large portion of precinct 30 is subject to inundation in a 1% AEP flood event.</p> <p>Noted.</p> <p>It is recommended that the exhibited MSS Clause be amended as follows:</p> <p>Clause 21.05-1 Key Issues and Influences: Integrated transport:</p> <ul style="list-style-type: none"> <li>• <u>As a regional centre with a relatively dispersed settlement pattern, Bacchus Marsh will continue to have a relatively high level of vehicle dependence. Neighbourhoods, activity centres and key destinations will need to be accessible by road, which in turn need to support public transport, cycling and walking.</u></li> <li>• <u>An efficient road network for Bacchus Marsh would:</u> <ul style="list-style-type: none"> <li>○ <u>Facilitate efficient east-west and north-south connections through the district area; and</u></li> <li>○ <u>Utilise ring roads to permit internal cross-town movements.</u></li> </ul> </li> </ul> <p>Clause 21.05-3 Objective – Integrated transport:</p> <ul style="list-style-type: none"> <li>• <u>Strengthen the potential for Bacchus Marsh district road networks to manage local traffic movements.</u></li> </ul> <p>Clause 21.05-3 Strategies:</p>



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			<p>station to continue to grow, with a proportionally smaller impact on traffic congestion.</p> <p>Given the likely benefits, the potential of ELR as a multi-modal corridor should be acknowledged in Amendment C81. Doing so would ensure better alignment with Amendment C81's broader transport objective to provide a high quality, sustainable, and integrated transport network in Moorabool Shire.</p>	<ul style="list-style-type: none"> <li>• Work with VicRoads to undertake improvements to the Bacchus Marsh arterial road network in accordance with the Bacchus Marsh Integrated Transport Strategy, 2015, <u>to facilitate multi-modal movements.</u></li> <li>• Ensure the provision of a <u>connected, integrated and multi-modal</u> transport network <u>within any urban growth precincts, and</u> between any urban growth precincts and the urban areas of Bacchus Marsh, Darley and Maddingley.</li> <li>• Facilitate the construction of an <u>multi-modal</u> ELR to cater for expected growth within <u>the township Bacchus Marsh</u> and surrounding areas and to remove freight movements from the town centre.</li> <li>• <u>Require that precinct structure plans for Parwan Station and Merrimu urban growth precincts identify the maximum number of lots which can be developed in each growth precinct prior to the ELR being constructed, and the local road network improvements necessary to facilitate such development.</u></li> <li>• Work with <del>Public Transport Victoria</del> <u>relevant State government agencies</u> to promote improvements to the existing public transport network, infrastructure and facilities within the Shire, including <del>a potential future 'park and ride station at Parwan in the medium to long term,</del> <u>the following future facilities to support urban growth in the Bacchus Marsh district:</u> <ul style="list-style-type: none"> <li>○ <u>A 'park and ride' train and bus station within Parwan Station urban growth precinct, co-located with an activity centre.</u></li> <li>○ <u>One or more 'park and ride' bus stations within Merrimu urban growth precinct, co-located with activity centres.</u></li> <li>○ <u>A 'park and ride' bus station in close proximity to the Darley Plaza activity centre.</u></li> </ul> </li> </ul>

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				<ul style="list-style-type: none"> <li>○ <u>A bus stop/station at each activity centre, except for lower order centres.</u></li> <li>• <u>Require that precinct structure plans for Parwan Station and Merrimu urban growth precincts identify appropriately located sites for future 'park and ride' facilities, and ensure that such sites are of adequate area and dimensions to facilitate flexibility in the design of such facilities.</u></li> </ul> <p>Clause 21.05-6 Further Strategic Work:</p> <ul style="list-style-type: none"> <li>• <u>Undertake traffic modelling to identify the maximum number of lots which can be developed in each growth precinct prior to the ELR being constructed, and the local road network improvements necessary to facilitate such development.</u></li> <li>• <u>Update the Bacchus Marsh Integrated Transport Strategy, to include consideration of the Bacchus Marsh Urban Growth Framework.</u></li> </ul> <p>It is recommended that the UGF be amended as follows:</p> <p>Element 4: Transport: Transport Strategies – Bus (page 62):</p> <p><u>Work with Public Transport Victoria on the following actions:</u></p> <ul style="list-style-type: none"> <li>• <u>Plan for an interim 'park and ride' bus station within Parwan Station urban growth precinct, co-located with an activity centre and the future train station site.</u></li> <li>• <u>Plan for one or more 'park and ride' bus stations within Merrimu urban growth precinct, co-located with activity centres.</u></li> <li>• <u>Plan for a 'park and ride' bus station in close proximity to the Darley Plaza activity centre.</u></li> <li>• <u>Plan for a bus stop/station at each existing/proposed activity centre, except for lower order centres.</u></li> </ul>

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			<p><u>New subdivisions:</u></p> <p>New residential developments provide opportunities to contribute to key objectives in clauses 21.3-2, 21.5-3,</p>	<p>Tables 1 (page 8) and 3 (page 86) - Key growth actions – state/regional:</p> <p>Project:  <u>Growth Precinct Traffic Modelling:</u>  <u>Traffic modelling to identify the maximum number of lots which can be developed in each growth precinct prior to the ELR being constructed, and the local road network improvements necessary to facilitate such development.</u>  Timing: Immediate.  Responsibility: Council.</p> <p>Project:  <u>Update the Bacchus Marsh Integrated Transport Strategy, to include consideration of the Bacchus Marsh Urban Growth Framework.</u>  Timing: Short term.  Responsibility: Council.</p> <p>With regard to walking and cycling infrastructure, the PSP for each growth precinct will need to include an integrated transport plan which would include provision for walking and cycling, and connectivity with the existing urban area. The exhibited MSS Clause 21.05-3 includes the following objective which is considered appropriate and does not require amendment:</p> <ul style="list-style-type: none"> <li>Require the provision of bicycle and pedestrian networks in new residential developments, with appropriate links to existing networks.</li> </ul> <p>Hopetoun Park North will comprise a mix of NRZ and LDRZ, each of which enable minimum lot sizes to be specified. The</p>

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			<p>and 21.7-7, around encouraging compact and sustainable urban development and integrated transport networks. However, TfV has concerns regarding a potential future subdivision at Hopetoun Park North, as identified in the UGF and Amendment C81.</p> <p>Hopetoun Park is poorly connected to surrounding transport networks, and offers few options to access employment and services aside from private motor vehicle. The area is unlikely to support a viable bus service in the future due to the distance and indirect route to Bacchus Marsh town centre and train station, and the low density development in the area. Further, significant commuter cycling from the area is unlikely given topographical constraints.</p> <p>A new subdivision at Hopetoun Park North will be similarly difficult to service by bus due to factors such as siting, topography, and access roads. Any future growth will be highly reliant on private automobile use. This would likely exacerbate existing traffic issues in Bacchus Marsh, and conflicts directly with Amendment C81's stated objectives to provide an integrate transport system, and to encourage mode shift to active and public transport modes.</p> <p>Neither Amendment C81 nor the UGF acknowledge or seek to address these limitations. As such, TfV does not support the future growth of Hopetoun Park North.</p> <p><u>Potential future Parwan Station:</u></p> <p>While Bacchus Marsh Railway Station will adequately service residents of Bacchus Marsh for a significant</p>	<p>application of LDRZ may be appropriate around the periphery of the precinct, at the interface with the freeway to the north, the existing LDRZ to the south, the Bacchus Marsh Irrigation District to the west and green wedge land to the east. The application of NRZ may be appropriate in the core of the precinct, to facilitate a walkable catchment for any future neighbourhood activity centre.</p> <p>A future planning scheme amendment will be required, to rezone the land and introduce a Development Plan Overlay. Details of the ultimate zone boundaries, minimum lots sizes, open space and community facilities will be determined as part of this future process. Regardless, the ultimate lot yield will be significantly less than what would be likely if the General Residential Zone was to be applied. The lower density development outcome will limit the community's expectation for bus services, but will be sufficient to enable delivery of new local-level community facilities (as per the precinct description and precinct planning principles for Hopetoun Park North, on page 81 of the UGF). New local-level community facilities will result in reduced need to travel beyond the precinct.</p> <p>As per the response to submission 4, the UGF includes a precinct planning principle relating to improved road connectivity for Hopetoun Park North. It is recommended that this principle be amended as follows:</p> <p><i>Consider opportunities to improve road connectivity <del>ons in and out of the precinct, onto</del> <u>with the Western Freeway to and from the west, and as well as Hopetoun Park junction with the Old Western Highway from Hopetoun Park Road.</u></i></p> <p>Refer to comments above regarding recommended amendments to MSS Clause 21.05-3, which will ensure that</p>

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			<p>period of time, TfV supports investigating the potential for a station at Parwan in the long term.</p> <p>Maps in the UGF indicate a future railway station at Parwan may be located on the site of the old station. Detailed engineering work will need to be undertaken to determine the optimum site for a new station. For example, it may be better to locate the station on the Melbourne side of the Whelans Road level crossing rather than the Ballarat side (the site of the old station) for operational reasons.</p> <p>Clause 21.5-3 proposes a future station at Parwan, while clauses 21.7-2 and 21.7-7 detail potential future urban growth in Parwan. However, these clauses do not acknowledge the need to protect potential future station sites.</p> <p>As such, Amendment C81 should provide conditions ensuring any future development around the rail corridor in Parwan leaves flexibility to move the location of the potential future station within a certain footprint.</p> <p>TfV and VicRoads look forward to working closely with Moorabool Shire Council on future opportunities to integrate land use and transport in Bacchus Marsh and the shire more broadly.</p>	<p>the PSP for the Parwan Station precinct identifies an appropriately located and dimensioned site for a future 'park and ride' train and bus station.</p> <p>Noted.</p>

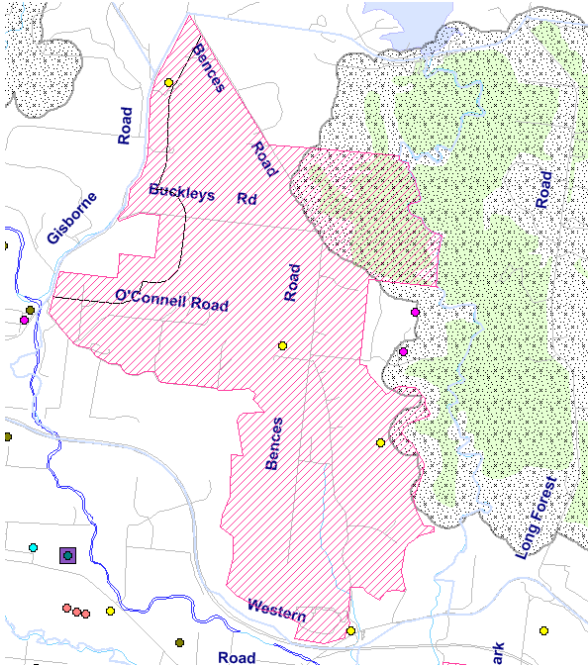
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45	Swans Road, Darley  Swans Road landowners	Comments only	<p>We the landowner group in Swans Rd, Darley represent over 260 Acres of land in close proximity to the existing residential development activity on the south side of Swans Rd in Darley and are wanting to ensure that any review of additional urban land for inclusion into Bacchus Marsh considers this significant and large landholding as part of the current review.</p> <p>We as the landowners are willing to be part of any review process as we feel that to consider our land at the same time as the current Urban Growth Framework (UGF) for Bacchus Marsh and Amendments C79 and C81 makes economic sense, to ensure that any additional urban land which can be serviced as part of any infrastructure investment is considered and that we can accommodate future housing needs be it conventional residential or a form of low density housing which will still require similar infrastructure spend.</p>	<p>Not supported.</p> <p>The Swans Road area was ruled out in the initial constraints assessment, as detailed on page 65 of the UGF. Figure 4 in the UGF indicates that this area is constrained by steep topography, is visually prominent and contains State/National significance geology. The area is also likely to be exposed to significant bushfire risk, due to its close proximity to the Lerderderg State Park directly to the north. The Lerderderg State Park has potential to pose a landscape scale bushfire risk; an issue that was discussed at length during the Panel hearing for Amendment C58 (Camerons Rd).</p> <p>As per the response to submission 23, it is recommended that Table 4 (Key growth actions – local) in the UGF be amended as follows: Ref No. 23: <del>Land use investigation project – Swans Road, Darley Rural Residential Strategy – Investigate supply, demand and opportunities for rural residential land uses within Bacchus Marsh district, and in proximity to other towns within the shire.</del></p> <p>The Swans Road area would be considered as part of this broader strategy.</p>
46	N/A  VPA	Supports amendment.	<p>The VPA has been working closely with Council over the past 2-3 years on the preparation of the UGF, the implementation of which forms the basis of Amendment C81.</p> <p>The VPA considers it important that the UGF provides a strong, long term vision for a peri-urban township identified in both Plan Melbourne 2017-2050 and the Central Highlands Regional Growth Plan as a key location for sustainable and contained growth. The</p>	Noted.

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			<p>UGF has previously been identified as a priority project for the VPA, and was included by the Minister for Planning in the VPA's Statement of Expectations for 2017-18.</p> <p>The VPA supports the amendment as exhibited, noting its consistency with the overall objectives of Plan Melbourne, and in particular Policy 7.1.2 to 'support planning for growing towns in peri-urban areas'. The VPA considers that the changes proposed to Clause 21 of the Moorabool Planning Scheme as part of Amendment C81 provide for an appropriate Local Planning Policy Framework response to the key objectives and outcomes outlined in the UGF.</p> <p>The VPA looks forward to continuing to work closely with Council as it considers submissions to C81 received during exhibition and assesses the potential for changes required to the UGF in response to these submissions.</p>	<p>Noted.</p> <p>Noted.</p>
47	N/A DELWP	Comments only	DELWP understands that any rezoning of areas under amendment C81 will be subject to a separate amendment process and will require considerable on-ground detailed planning and further analysis to identify environmental constraints and finalise exact boundaries, transport networks, utilities such as gas, open space, densities of development and community infrastructure.	Noted.

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48	129 Possumtail Run, Merrimu	Comments only	<p>Submitter has concerns and would like assurances on the following:</p> <ul style="list-style-type: none"> <li>• Any development that borders Possumtail Run is large residential blocks of a minimum 2 acres and density and reduction in size gradual from this point.</li>   <li>• Possumtail Run is not extended or connected to any other road; no through road to other estates;</li>   <li>• Any adjoining properties provide access for kangaroos and other wildlife in terms of grassland, fencing, building envelopes and weed control.</li> </ul>	<p>The Possumtail Run estate lies immediately to the east and south of the Merrimu residential growth precinct, as depicted in the UGF. As stated in the UGF (page 71), “ ..... <i>some existing estates such as Dodemaide Court and Possum Tail Run are subject to covenants limiting future growth. These areas can be expected to remain as lifestyle lots</i>”.</p> <p>These estates also provide an important low density interface with the adjoining Long Forest Nature Conservation Reserve, with its inherent biodiversity values and bushfire risk.</p> <p>Also, as noted in response to submission 24, it needs to be emphasised that the future growth precincts are essentially investigation areas. Future PSPs will need to define the urban boundaries and zone and overlay controls, in response to the findings of further detailed technical investigations (e.g. environmental values/risks, heritage values, infrastructure).</p> <p>As discussed above, Possumtail Run is located beyond the Merrimu residential growth precinct and will therefore not be subject to future development as part of a future PSP process. However, it is noted that the Possumtail Run road reserve extends to the northern boundary of the estate and, therefore could potentially be extended to provide access to a neighbouring development, even with the current RCZ controls.</p> <p>As discussed above, future PSPs will need to define the urban boundaries and zone and overlay controls, in response to the findings of further detailed technical investigations.</p>



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			<ul style="list-style-type: none"> <li>• No double storey or dual use properties such as home run businesses to border Possumtail Run.</li> <li>• Current fencing is retained as suitable, if any changes are required they are to be fully paid for by the developer.</li> <li>• - Water services and pressure are not negatively impacted by the increased number of dwellings.</li> </ul>	<p>As per the response to submission 24, it is recommended that the detailed planning considerations for Merrimu precinct (page 73 of the UGF) be amended as follows:</p> <p>Define the eastern edge by the Long Forest Nature Conservation Reserve (second dot point):</p> <ul style="list-style-type: none"> <li>• Ensure residential densities, siting and design respond appropriately to bushfire risk <u>and the principle of protecting and enhancing biodiversity values.</u></li> </ul> <p>This matter is beyond the scope of Amendment C81, the UGF and the future PSP process. Planning zone controls do not prohibit double storey development. This is a matter for consideration as part of a future application for a planning permit (if required) or building permit.</p> <p>This matter is beyond the scope of Amendment C81, the UGF and the future PSP process.</p> <p>This matter is beyond the scope of Amendment C81 and the UGF. The future PSP process will include detailed investigations with respect to the provision of infrastructure such as water to new growth areas.</p>

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49	N/A CFA	Does not support amendment	<p><u>Bushfire Hazard:</u></p> <p>Much of the land designated as 'future residential growth precinct' and 'future investigation area' is within a bushfire prone area (BPA) and some parts may be subject to a BMO.</p>	<p>Noted. Most of regional Victoria is within a bushfire prone area.</p> <p>The BMO only affects the eastern portion of the Merrimu growth precinct, as shown by the grey shading on the map below (Figure 14). No other growth precincts are affected.</p>  <p><b>Figure 14:</b> BMO affected land (Grey shading) in relation to Merrimu growth precinct (pink hatching).</p> <p>As per the response to submission number 24, it is recommended that the Merrimu residential growth precinct be amended on Plans 1, 3, 4, 5, 6, 7 and 8, to exclude steep and</p>


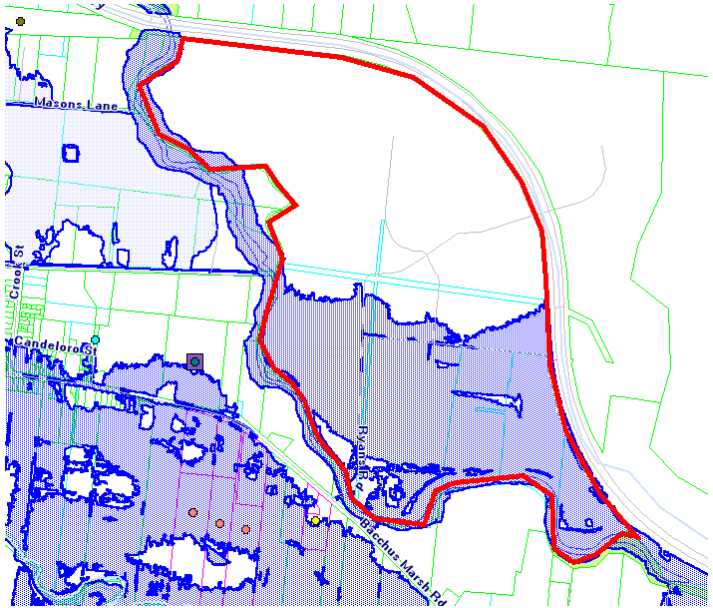
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			<p><u>Bushfire Mitigation Measures:</u></p> <p>The amendment comments on how it addresses bushfire risk but does not include any mention of how it will support amended Clause 13.05-1 (Bushfire Planning), in relation to prioritising the protection of human life.</p> <p>Detailed assessment of bushfire risk, in both bushfire prone and bushfire management overlay areas, will be required as part of future work for precinct structure plans or development plans for urban growth investigation areas.</p> <p><u>Conclusion:</u></p> <p>CFA does not support the amendment and requires a change to the form of the proposed amendment to better reflect recent (VC140) changes to Clause 10 and Clause 13.05.</p>	<p>heavily vegetated land to the east of Bences Road, north of Possumtail Run estate and south of Dodemaide Circuit estate.</p> <p>SPPF Clause 13.05 (Bushfire) was significantly updated via amendment VC140 which was gazetted on 12 December 2017, during the exhibition of the amendment. See below for an extract of the most relevant part of the updated Clause 13.05.</p> <p>Agreed. This is a sensible approach. It is recommended that UGF be amended, by adding the following precinct planning principle for each growth investigation area:</p> <ul style="list-style-type: none"> <li>Undertake a detailed assessment of bushfire risk, in Bushfire Prone Areas and Bushfire Management Overlay areas, and respond to State Planning Policy Framework Clause 13.05.</li> </ul> <p>As discussed above, it is recommended that an area of steep and heavily vegetated land to the east of Bences Road be excluded from the Merrimu growth precinct. This land represents most of the area affected by the BMO.</p> <p>Below is an extract of the most relevant part of the updated Clause 13.05:</p> <p><i>“Settlement planning:</i></p> <p><i>Plan to strengthen the resilience of settlements and communities and prioritise protection of human life by:</i></p> <ul style="list-style-type: none"> <li><i>Directing population growth and development to low risk locations, being those locations assessed as having a radiant heat flux of less than 12.5 kilowatts/square metre under AS 3959-2009 Construction of Buildings in Bushfire-prone Areas (Standards Australia, 2009).</i></li> </ul>

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				<ul style="list-style-type: none"> <li>• <i>Ensuring the availability of, and safe access to, areas assessed as a BAL-LOW rating under AS 3959-2009 Construction of Buildings in Bushfire-prone Areas (Standards Australia, 2009) where human life can be better protected from the effects of bushfire.</i></li> <li>• <i>Ensuring the bushfire risk to existing and future residents, property and community infrastructure will not increase as a result of future land use and development.</i></li> <li>• <i>Achieving no net increase in risk to existing and future residents, property and community infrastructure, through the implementation of bushfire protection measures and where possible reduce bushfire risk overall.</i></li> <li>• <i>Assessing and addressing the bushfire hazard posed to the settlement and the likely bushfire behaviour it will produce at a landscape, settlement, local, neighbourhood and site scale, including the potential for neighbourhood-scale destruction.</i></li> <li>• <i>Assessing alternative low risk locations for settlement growth on a regional, municipal, settlement, local and neighbourhood basis.</i></li> <li>• <i>Not approving any strategic planning document, local planning policy, or planning scheme amendment that will result in the introduction or intensification of development in an area that has, or will on completion have, more than a BAL-12.5 rating under AS 3959-2009.</i></li> </ul> <p><i>Areas of high biodiversity conservation value:</i></p> <p><i>Ensure settlement growth and development approvals can implement bushfire protection measures without unacceptable biodiversity impacts by discouraging settlement growth and development in bushfire affected areas that are of high biodiversity conservation value."</i></p>

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50	BM Grammar, Maddingley  Bacchus Marsh Grammar	Comments only	<p>Bacchus Marsh Grammar will commence 2018 with an enrolment of approx. 2,300 students on its Maddingley site and another 100 students at its Woodlea ELC. It plans to open its primary campus at Woodlea in 2019 with over 600 students.</p> <p>The school has during 2017 received a record number of expressions of interest for positions at the school and its highest number of applications for enrolment. The number of applicants increased as the year went on.</p> <p>The school sees that with its current campus and Woodlea campus opening in 2019 that it will barely keep pace with demand for positions at the school.</p> <p><u>Submission:</u></p> <p>The school commends Council and the VPA on the broad structure plan that has been produced. The plan gives clear scope for residential growth, tackles some of the current planning issues of the town and preserves its essentially rural heart. For many of our prospective parents the rural feel of Bacchus Marsh is a significant factor in their decision making relating to schools.</p> <p>The school strongly supports the notion of the College Precinct Consolidation and is keen to be involved in working with Council on this project.</p> <p>The school is keen to also be involved in discussion relating to the Maddingley Employment Investigation Area. The school sees that there would be significant benefits to the school and the southern end of town if there was a gradual grading of activities within this zone that could provide an effective barrier between</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted. As per the response to submissions 7 and 13, it is recommended that the UGF (including the legend to the above plans) be amended, to clarify the intent that no new sensitive uses are permitted within the buffer interface areas and within the Maddingley Employment Investigation Area (except for the</p>

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			<p>residential and education uses and employment related activities. In particular, the school would be interested in the potential to develop parts of this area for school facilities but may provide the capacity for greater buffering and an enhancement of the college precinct.</p> <p>The school has developed as a key feature of its programs the integration of nature based activity and learning into its programs. These students attend our essentially rural campus at Straughton Vale as day students to undertake a variety of activities that are not possible at its current site. It will need potentially further sites to develop and fully integrate this program into the school curriculum. A site of potential interest is the Sunnystones Camp site. The school would look to potentially retain the school camp component of the site and add to it with junior primary prep to year 4 day use of the facility. This would see these students using the site on rotation from the Maddingley site for an outdoor/environmentally centred program. Bacchus Marsh and Moorabool offers one of the few areas in which this kind of activity is potentially viable. Existing infrastructure makes the Sunnystones site a particularly interesting one in this regard.</p>	<p>possible future expansion of existing sensitive uses, subject to demonstrating how amenity impacts will be mitigated).</p> <p>EPA publication 1518 'Recommended separation distances for industrial residual air emissions' 2013 defines "sensitive land uses" as any land uses which require a particular focus on protecting the beneficial uses of the air environment relating to human health and wellbeing, local amenity and aesthetic enjoyment, for example residential premises, child care centres, pre-schools, primary schools, education centres or informal outdoor recreation sites.</p> <p>Noted. Sunnystones is an existing facility. Any future use proposal would be subject to consideration of a planning permit application (if a permit is required), unless the proposed use satisfies existing use right provisions (VPP Clause 63).</p>

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51  (late submission)	437 Bacchus Marsh Road, Bacchus Marsh	Supports amendment subject to changes	<p>1. <u>Introduction:</u></p> <p>Our client generally supports the Shire's plan to update the existing framework plan at Clause 21.07 and agrees with the need to identify future growth areas for the town. However, our client is of the view that the land (i.e. 437 Bacchus Marsh Road; see Figure 15) represents a long term investigation area for residential growth. This is on the basis of a number of considerations as set out in more detail in our submission. The land is considered to be more suitable for residential growth in comparison to Merrimu and Parwan Station as the nominated growth areas identified in the UGF.</p> <p>Our clients' submission is that their land should be nominated as a <b>'long term future investigation area for residential growth'</b> in the Bacchus Marsh District Urban Growth Framework 2017 (UGF), with subsequent references in the MSS.</p> <p>2. <u>Site Description:</u></p> <p>The land comprises an area of 142ha, with frontage to Lerderberg River, Western Freeway and Bacchus Marsh Road and the Avenue of Honour. The land is currently being used for the growing of turf.</p>	<p>The submitter's proposal is not supported, for the following reasons:</p> <ul style="list-style-type: none"> <li>• The subject land is highly productive agricultural land, located within the Bacchus Marsh Irrigation District.</li> <li>• The proposal conflicts with SPPF Clause 14.01 which has the objective: <i>"To protect productive farmland which is of strategic significance in the local or regional context"</i>.</li> <li>• The proposal conflicts with LPPF Clause 21.04 which has the objective: <i>"To protect good quality agricultural land and support the productivity and sustainability of existing and future agricultural and horticultural activities"</i>.</li> <li>• The proposal conflicts with LPPF Clause 21.07-3 which has the strategy: <i>"Protect the Bacchus Marsh irrigated horticultural land from residential encroachment and ensure appropriate interface treatments in development abutting these areas"</i>.</li> <li>• The southern half of the subject land is subject to flooding in a 1%AEP storm event, as depicted by blue shading on the map below (Figure 16).</li> </ul>

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			 <p data-bbox="705 671 840 687"><small>Figure 1 The subject site</small></p> <p data-bbox="705 692 1155 719"><b>Figure 15:</b> 437 Bacchus Marsh Road</p> <p data-bbox="705 751 1346 903">The land is currently zoned Farming Zone, and is covered by the Design &amp; Development Overlay Schedule 2, Schedule 3, Environmental Significance Overlay Schedule 2 and Schedule 8, Heritage Overlay HO56 and Public Acquisition Overlay PA01.</p> <p data-bbox="705 935 1357 1118">The land is currently being used as a turf farm growing and cultivating lawn grass for commercial use. Vehicular access to the site is via an existing dual width crossing to Bacchus Marsh Road. The land largely flat and clear of vegetation other than along the Lederberg River.</p> <p data-bbox="705 1150 965 1177">3. <u>Amendment C81:</u></p> <p data-bbox="705 1209 1335 1361">The Amendment shows the land, in Plan 1, as part of the Bacchus Marsh Irrigation District. The plan also shows the future Eastern Link Study Area which is shown in an appropriate location to the north of the land.</p>	 <p data-bbox="1391 967 2074 1023"><b>Figure 16:</b> Map showing the 1%AEP flood extent (blue shading) over 437 Bacchus Marsh Road (outlined in red).</p>



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			<p>The Background report to Amendment C81 notes that Bacchus Marsh will become a multi-nodal settlement, comprising a core area and new master planned communities at Merrimu, Parwan Station and Hopetoun Park North. The report notes that there is growing pressure to address housing and urban growth needs.</p> <p>4. <u>Requested Changes to Amendment C81:</u></p> <p>Our client believes that the UGF and the associated MSS should be amended to identify the land, including land to the west connecting to the existing urban area of Bacchus Marsh, as long term investigation area for residential growth.</p> <p>This is supported for the following reasons:</p> <ul style="list-style-type: none"> <li>• The land, while being in the BMID is not used for high value agricultural purposes in respect to contributing to the Bacchus Marsh food bowl.</li> <li>• The land is more readily available and suitable for urban development than the growth areas nominated in the UGF in Merrimu and Parwan due to its proximity to existing urban areas and infrastructure.</li> <li>• The site is a logical extension of the townships local settlement boundary to the west and the Western Freeway acts as a physical barrier along the northern boundary.</li> <li>• The land is located within 1.5klms of the town centre and there is existing residential development within 1klm.</li> <li>• Exploring future urban land uses on the land would not impact on the overall supply of agricultural land within the broader BMID.</li> </ul>	

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			<ul style="list-style-type: none"> <li>• The proposed Eastern Link will likely impact on the ability of the land to continue to operate for agricultural purposes as it will likely require access through and across the site.</li> <li>• The urban use of the land would support the significant investment that the Eastern Link would present.</li> <li>• The land is a large land holding and is capable of meeting a considerable amount of the future housing needs for the area.</li> <li>• Services are available to and within the site including electricity, gas, potable water, telecommunications all directly available to the property.</li> <li>• There is an existing vehicular access point to Bacchus Marsh Road to the south of the site via a double width crossing and bridge over the Lerderberg River. The current access point clear of trees forming part of the Avenue of Honour and there is the ability to further widen the crossing without impacting on significant trees.</li> <li>• Additional access to the site is available to the west, connecting to Lerderberg Street with direct access to the town centre.</li> <li>• The Lerderberg River frontage of the site would offer a high amenity for future residents.</li> <li>• The land is not identified as being within the 1:100 year flooding area from the Lederberg River as identified by WBM Oceanics in the Bacchus Marsh Floor Risk Study (2005).</li> <li>• Nominating the land as a 'long term investigation area' will not compromise the viability or future planning of the other nominated growth areas in the UGF.</li> </ul>	

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			<p>Nominating the land in the UGF as a long term investigation area would support the undertaking of further investigations into the specific development potential of the site in support of Council's overall vision to meet the future housing needs for the community.</p>	

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52	Merrimu precinct	Supports amendment subject to changes	<p>Our client controls in excess of 500 hectares of land within Merrimu, presenting a unique opportunity for the precinct to be developed as a master-planned community, comprising a range of housing types, employment opportunities, and an integrated open space network.</p> <p>We have commissioned a full suite of background studies for the Merrimu precinct in-line with VPA template requirements. These background studies will be used to inform the planning process, and ultimately will provide the basis for the preparation of a Precinct Structure Plan (PSP) for the Merrimu Residential Growth Precinct.</p> <p>Our client endorses the preparation of the UGF and supports a number of the key elements proposed, including:</p> <ul style="list-style-type: none"> <li>• The overarching growth objectives for the township of Bacchus Marsh, that are consistent with Plan Melbourne and the Central Highlands Regional Growth Plan and identifies the township as a key peri-urban growth centre;</li> <li>• The identification of Merrimu as a future residential growth precinct within the UGF; and</li> <li>• The need to prioritise the delivery of the ELR, that will provide a key alternative route for heavy vehicles travelling through Bacchus Marsh.</li> </ul> <p>As has been discussed previously, our client wishes to raise a number of select issues in respect of the amendment. To summarise, these are:</p> <ul style="list-style-type: none"> <li>• The timing of the precinct in terms of Precinct Structure Plan (PSP) preparation and the subsequent commencement of the development.</li> </ul>	<p>Noted</p> <p>Noted</p> <p>Support noted.</p> <p>See below</p>

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			<ul style="list-style-type: none"> <li>• The planning and delivery of the Eastern-Link Road.</li> <li>• The staging of development.</li> <li>• The need to align the UGF with the relevant statute proposed within the MSS</li> </ul> <p>The remainder of the submission will deal with these issues directly.</p> <p>The UGF identifies four distinct Elements including environment, employment, housing &amp; community infrastructure and transport; that form the basis of the plan. Each of these elements have relevance to the future suburb of Merrimu and will be addressed in this submission.</p> <p><u>Timing and Infrastructure:</u></p> <p>The UGF identifies the Merrimu precinct as a medium to long term growth proposition, (i.e. 5 to 10 years), however identifies that the timing of development occurring in the precinct is contingent on the delivery of the ELR. We submit that the Merrimu precinct should be elevated to the designation of a short term priority for both precinct planning and subsequent development. BMD are committed to working with Moorabool Shire, the VPA and other responsible agencies to ensure that planning is undertaken comprehensively and facilitates the development of Merrimu as a master-planned community that integrates with the existing township of Bacchus Marsh and complements the physical, social and economic attributes of the future settlement.</p> <p>Planning for the ELR is to be undertaken by VicRoads, who have recently received funding to commence a</p>	<p>Not supported. See response to submission 37.</p> <p>The UGF sets a clear expectation that the priority for short term development is infill and greenfield opportunities within the existing Bacchus Marsh urban area. In the event that population growth rates trend higher than those recently experienced, there is capacity to bring forward planning for growth in the new growth precincts. As per Table 5 (Sequencing) of the UGF, timing is dependent on land supply and demand analysis in the first instance, but sequencing should be brought forward if the precinct can demonstrably deliver the ELR.</p> <p>The UGF notes the relationship between development of Merrimu and Parwan Station precincts, and the planning for</p>

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			<p>detailed study with the objective of confirming a preferred alignment for the road. The northern section of the road (i.e. to the north of the Western Freeway linking to Gisborne Road) will influence the development of the Merrimu precinct and in turn development of the Merrimu precinct should enable the delivery of this road.</p> <p>Our preliminary investigations in respect of the potential road alignment and staging have qualified that development can occur prior to the initial delivery of the Eastern Link, thereby generating an income stream from development via means of development contributions that can then be put towards the delivery of the road. We note this is a commonly accepted means of road delivery in the growth areas. This in no way reduces our commitment to delivering the road and our best endeavours to do this in a timely manner. However, this approach will ensure a more practical way to facilitate the delivery of the road in line with development.</p> <p>We also have identified that our preferred route would be located outside of the growth precinct itself (refer to the plan included at Appendix 1).</p> <p>Our preferred route has the following advantages:</p> <ul style="list-style-type: none"> <li>• A shorter distance from Bacchus Marsh-Gisborne Road to the Western Freeway than alternative routes located further east thereby facilitating delivery sooner;</li> <li>• Minimal land acquisition through utilisation of existing road reserves where possible;</li> <li>• Appropriate separation distances between existing interchanges; and</li> </ul>	<p>the ELR (ELR). The ELR will be important for removing through-traffic (particularly heavy vehicles) from the centre of Bacchus Marsh, and also for providing critical connectivity between the future growth precincts, particularly Merrimu, Parwan Station and PEP.</p> <p>Noted. Alignment options for the ELR are beyond the scope of the UGF. This is the purpose of the VicRoads road corridor study. It is considered essential that the road corridor study is completed prior to preparing PSPs for Merrimu or Parwan Station growth precincts, as the ELR alignment will have a major influence on the development layout in these precincts.</p> <p>See above.</p> <p>See above.</p>

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			<ul style="list-style-type: none"> <li>Is setback from the steep incline of the Western Freeway (Melbourne bound) to the east, providing truck drivers with sufficient distance to build appropriate speed and reduce gear changes.</li> </ul> <p><u>A Quantum Change:</u></p> <p>Historical land supply and demand for residential land in Bacchus Marsh demonstrates that the township has been able to sustain consistent, incremental growth to the established township through a number of greenfields residential developments. However, it is clear that the extent of growth anticipated through the UGF will dramatically alter the land supply equation for the township. The quantum change to supply will influence the demand drivers and thereby the rate of growth of Bacchus Marsh as a whole.</p> <p>Currently, the UGF forecasts the existing estates with zoned land may provide adequate land to accommodate 15 years of supply. However, there is considerable research to suggest that the sales rates of masterplanned communities are higher than in comparison to more conventional incremental urban growth and therefore the estimated land supply is underrated.</p> <p>The experience of Warragul and Drouin as well as the adjacent Melton corridor highlight that if land is the subject of an approved Precinct Structure Plan, then the rates of development that follow will be at a much higher rate than the historical average. In addition, we consider that Bacchus Marsh will continue to develop its competitive advantage over the Melton Growth corridor located further east.</p>	<p>See above comments regarding growth rates.</p> <p>See above.</p> <p>See above.</p>


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			<p>The UGF estimate of required land is predicated on population growth rates of between 2.6% and 3.5% and as it stands, Bacchus Marsh is already at 3.5% (as at the 2016 census). In addition, the Melton corridor is also experiencing unprecedented growth at 4.4% and we submit that it is likely that an element of demand transfer will occur from the Melton corridor through to Bacchus Marsh, once supply is available.</p> <p>As a consequence, if the growth rate in Bacchus Marsh exceeds 3.5% (which it may already have done given almost all regions have experienced a significant increase in population since the Census as has Bacchus Marsh), then the supply of land dramatically reduces below the 15 years supply and closer to 10 years supply.</p> <p>It is acknowledged that these are estimates only, however, as growth nears 4% there will be a significant multiplier effect, which could substantially impact on all residential supply. Our contention is that in such a scenario, retaining the Merrimu precinct as a medium to long term proposition creates significant risk. The more appropriate response, given the likely population growth, is to reclassify it as a short term proposition.</p> <p>To provide further support to our submission that Merrimu should be designated as a short term priority, Our client will commit to providing further data and research to assess the expected impact of the proposed development of the Merrimu precinct on the future growth rate of the Bacchus Marsh township.</p> <p><u>Staging of Development:</u></p>	<p>Council is currently reviewing the population growth rate projections/scenarios, to assess potential spikes in demand in Bacchus Marsh based upon the new planning framework/development paradigm. Nevertheless, the UGF provides sufficient flexibility on timing to allow Council and the VPA to respond to higher growth rates.</p> <p>See above.</p> <p>See above.</p> <p>See above.</p>



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			<p>The UGF provides specific intent in regards to development staging, stipulating that:</p> <p>“Merrimu should be developed in a progressive, continuous manner, moving from the existing urban areas (generally south to north and east to west) and delivering an activity centre with each stage of development.”</p> <p>We submit that the staging of development should in fact commence from Buckleys Road and head east and south.</p> <p><u>Discordance of UGF and MSS:</u></p> <p>We note that the UGF and the MSS (specifically in respect of timing and staging of development) are somewhat discordant. We would like the opportunity to discuss the specific clauses of the MSS that differ from the UGF in this respect and ensure that there is sufficient accordant between both documents.</p>	<p>Agreed. There is logic to providing for Merrimu to develop in the first instance from the west, taking advantage of connections to existing communities at Bacchus Marsh and Darley via Gisborne Road. It is likely that upgrades to the existing road network will be required to support these first stages of development, and these will need to be appropriately defined in any future PSP. It is recommended that the draft be amended (on page 71) as follows:</p> <p><i>Merrimu should be developed in a progressive, continuous manner, moving from the existing urban areas (generally <u>west south to east north and north east to south west</u>) and delivering an activity centre with each stage of development. <del>Staging the southern portions first should provide a</del>An activity centre should be delivered in the early stages, to <del>that will likely serve the existing Merrimu Long Forest and Hopetoun Park population and concurrently deliver the ELR connection to the Western Freeway.</del></i></p> <p>Agreed. Any inconsistencies between the UGF and MSS with regard to development staging will need to be corrected. As per the response to submission 20, it is recommended that Table 1 the UGF be amended, to state that:</p> <ul style="list-style-type: none"> <li>• The timing for Parwan Station and Merrimu precincts is ‘medium <u>to long</u> term’, consistent with Tables 3 and 5.</li> <li>• The timing for Parwan Employment Precinct is ‘short <u>to medium</u> term’, consistent with Tables 3 and 5.</li> </ul> <p>As per the response to submission 19, it is recommended that the following changes be made to the exhibited MSS Clause 21.07-2 Bacchus Marsh – Objective – Managing Urban Growth:</p>

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				<p>Objective number one:</p> <ul style="list-style-type: none"> <li>To accommodate <u>medium to</u> long term residential growth within the investigation areas at Merrimu, Parwan Station and Hopetoun Park.</li> </ul> <p>Strategy number one:</p> <ul style="list-style-type: none"> <li>Contain short <del>to medium</del> term residential development within the existing settlement boundary (infill and greenfield).</li> </ul> <p>Strategy number three (N.B. It is agreed that the ELR is not critical for Hopetoun Park North precinct):</p> <ul style="list-style-type: none"> <li>Provide for medium to long term residential growth within the investigation areas at Merrimu, <u>and</u> Parwan Station <del>and Hopetoun Park</del>. Medium-term timing may be considered for one or more growth precincts if it can be demonstrated that such precinct/s will facilitate the provision of an ELR.</li> </ul> <p>Add strategy number four:</p> <ul style="list-style-type: none"> <li><u>Provide for medium term residential growth within the investigation area at Hopetoun Park, subject to demonstrating how the precinct will facilitate improved connectivity with the Western Freeway, to and from the west.</u></li> </ul>

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53  (late submission)	N/A  SRW	Comments only	<p>Given the breadth of the document we will limit our comments to two key areas:</p> <ul style="list-style-type: none"> <li>• Bacchus Marsh Irrigation District</li> <li>• Diggers Rest - Coimadai Rd.</li> </ul> <p><u>Bacchus Marsh Irrigation District:</u></p> <p>Southern Rural Water (SRW) is pleased to see the recognition and protection of the Bacchus Marsh Irrigation District (BMID) in the plan.</p> <p>As acknowledged in the plan, <i>the BMID is a state-significant irrigation and agricultural district administered by Southern Rural Water. The BMID supports most of Bacchus Marsh's agricultural production, thanks to its fertile alluvial soils and location in the Bacchus Marsh Valley.</i></p> <p>We support the key principle which identifies the need to protect valuable agricultural land, including that of the BMID.</p> <p>To this extent SRW supports the plan to review zones, overlays, policy statements and buffers to protect and facilitate investment in the agricultural sector.</p> <p>We look forward to working with Council on this review.</p> <p><u>Diggers Rest - Coimadai Rd:</u></p> <p>SRW owns considerable land at Merrimu. We own Lake Merrimu and its surrounds as well as a strip of land running along the south side of Diggers – Rest Coimadai Rd from Gisborne Rd to Long Forest Rd. The land varies between 70m to 480m in depth from</p>	<p>Noted.</p> <p>The land referred to is shown outlined in red on the map below (Figure 17). All of the land is currently within the Public Use Zone 1 – Service and Utility.</p>

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			<p>Diggers Rest - Coimadai Rd, covering an area of approximately 90ha.</p> <p>In accordance with the Victorian Government Landholding Policy and Guidelines, SRW has reviewed its property portfolio and found much of the land along the south side of Diggers Rest - Coimadai Rd as being surplus to its needs (i.e. it is not used for operational purposes and does not drain into Lake Merrimu).</p> <p>All of the land falls within the boundary of the Bacchus Marsh Urban Growth Framework.</p> <p>The land comprises a number of distinct parcels, all of which are zoned Public Use Zone:</p> <ol style="list-style-type: none"> <li>1. Merrimu Estate – 21ha of cleared land adjacent to Bences Rd, abutting the Dodemaide Crt development.</li> <li>2. Former quarry site – 29ha to the east of Merrimu Estate</li> <li>3. Forested area – 25ha either side of Pyrites Creek abutting the north side of the Long Forest Nature Reserve</li> <li>4. Cleared land – 16ha fronting Long Forest Rd.</li> </ol> <p>Government guidelines require us to rezone any land from Public Use Zone to a more suitable zoning prior to its sale.</p> <p>The UGF identifies the fourth area as an existing rural residential area, a designation which we fully support and have requested a rezoning to reflect this intent and enable its disposal.</p> <p>The UGF is however silent with respect to the remaining three areas.</p>	 <p><b>Figure 17:</b> Zoning map showing the PUZ1 land referred to in this submission delineated in red</p> <p>The UGF maps incorrectly depict site number 4 as 'existing rural residential'. This is a mapping error which should be corrected.</p> <p>The UGF intends to be silent on all of the existing PUZ land, as the land is more distant from the existing urban area than</p>

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			<p>SRW is currently examining options to establish native vegetation offsets over the land either side of Pyrites Ck and has had discussions with Parks Victoria, DELWP, the PP&amp;WCMA and Melbourne Water regarding the potential to annex this land to the Long Forest Nature Reserve.</p> <p>SRW has considered a number of options for the Merrimu Estate and the old quarry site and, in 2015, sought a rezoning of the former as a prelude to its disposal. We were subsequently advised by Council that the request would not be progressed pending the preparation of an urban growth strategy for Bacchus Marsh.</p> <p>As indicated above the UGF is silent with respect to both our Merrimu Estate and former quarry sites. This leaves the land in a planning policy vacuum and prevents its sale.</p> <p>The land is not highly productive agricultural land and is insufficient in size to sustain a viable farm. It has been largely cleared with ecological surveys indicating that it is unlikely to support any rare or threatened flora or fauna. The most logical future use of the land would be for low density/rural residential purposes as a natural extension of the existing low density residential estate to the immediate south (i.e. Dodemaide Crt).</p> <p>Further substantiation of the rezoning can be found in a detailed report prepared by GHD and which was</p>	<p>the nominated growth precincts, much of the land is encumbered with remnant native vegetation, and it would likely be exposed to an unacceptable bushfire risk.</p> <p>Annexing the vegetated land to the Long Forest Nature Reserve is considered a sensible approach.</p> <p>Noted.</p> <p>Noted. However, the land is not required for urban growth, as the growth precincts nominated in the UGF will provide for the urban growth needs of the Bacchus Marsh district up to 2041 and beyond.</p> <p>The primary purpose of the UGF is to provide a long term framework for urban growth, in order to accommodate the growing population. Thus, the main focus of the growth precincts is to identify land suitable for residential development. The UGF does not need to consider demand for low density/rural residential land.</p> <p>SRW's proposal to rezone this surplus land is a matter beyond the scope of the UGF. SRW's proposal to rezone this land</p>

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			<p>provided to Council as part of the rezoning request in 2015.</p> <p>Having regard to the above, we respectfully request that:</p> <ul style="list-style-type: none"> <li>the BMUGF be amended to show the existing Dodemaide Court development and our land comprising Merrimu Estate and the former quarry as rural residential land.</li> </ul>	<p>should only be considered after Amendment C81 has been completed.</p> <p>Not supported.</p>

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54  (late submission)	N/A  DEDJTJ – Earth Resources Regulation	Comments only	<p>DEDJTR has reviewed amendment C81 with respect to the potential effect of future urban development upon earth resources in the subject area, particularly those of strategic importance to the State. Relevant components of the amendment include:</p> <ol style="list-style-type: none"> <li>1) Designating the Darley extractive industries area (sand resources) as an area for future investigation (post closure).</li> <li>2) Establishing the Merrimu residential precinct over areas including recognised sand and gravel resources.</li> <li>3) Future conversion of the Hopetoun sand and gravel resource for future residential development.</li> <li>4) Introduction of future employment land adjacent to the coal mine at Maddingley (post closure).</li> </ol> <p>DEDJTR's review of the amendment has been informed by a meeting held at the VPA office on 5 December 2017. Consideration has also been given to the <i>Melbourne Supply Area – Extractive Industry Interest Areas Review (2003)</i> and the <i>Extractive Resources in Victoria: Demand and Supply Study 2015-2050 (PwC, 2016)</i>.</p> <p>The 2016 Demand and Supply Study lists the Moorabool Shire Council as Victoria's eleventh most strategically important local government area for extractive resources, and within the top five most important on the basis of its sand and gravel resources alone. These resources are vitally important for supporting the growth of Greater Melbourne, and accordingly must be afforded appropriate protection to avoid sterilisation and encroachment of incompatible uses, particularly with respect to those resources that are viable for future development.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

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			<p>Extractive Industry Interest Areas (EIAs) are located across the study area, specifically throughout the Merrimu, Hopetoun Park and Maddingley/Parwan areas. Although EIAs have no legal effect, they do identify key extractive resources that were considered suitable for extraction at the time of the EIAs being delineated in 2003. It is important that Council analyses the extractive industry potential of these resource areas so that this land use is suitably prioritised ahead of any future urban growth option.</p> <p>An assessment of four growth precincts containing important resources within the UGF area is outlined below.</p> <p><u>Darley Sand Quarry Investigation Area:</u></p> <p>Strategically significant sand resources are located in this area. The area contains several quarry operations that play a critical role in supplying these sand resources into Greater Melbourne. Suitable buffers should be incorporated into future PSPs to ensure operations have the flexibility to adjust operations as required, without being encumbered by allowing adjoining sensitive uses.</p> <p>DEDJTR recommends that the UGF contain statements to direct future PSPs to prevent inappropriate encroachment of sensitive uses that would limit the extraction of sand resources from the area. A suitable buffer should also be introduced into the UGF to protect the sand resources from rural residential uses in the adjoining Coimadai area.</p>	<p>Noted.</p> <p><u>Darley Sand Quarry Investigation Area:</u></p> <p>The UGF (on Plans 1, 3, 4, 5, 6, 7 and 8) shows a “buffer interface required for sensitive uses (subject to further investigation)”, which measures 250m from the quarry boundaries. Cement, Concrete and Aggregates Australia (submission 25) has advised that some of the quarry operators undertake blasting operations in the process of removing overburden material. As such, it is recommended that the UGF be amended as follows:</p> <ul style="list-style-type: none"> <li>• Amend Plans 1, 3, 4, 5, 6, 7 and 8, to show a clearly delineated 500m wide buffer (no sensitive uses permitted), in accordance with EPA Publication 1518 <i>Recommended separation distances for industrial residual air emissions</i>.</li> <li>• Amend Plans 1, 3, 4, 5, 6, 7 and 8, to show a clearly delineated 500m wide buffer (no sensitive uses permitted) on the western side of the Darley sand quarry investigation area, at the interface with the existing rural residential area. This buffer is already specified in Schedule 14 to the</li> </ul>



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			<p>The UGF states that upon the exhaustion of the resources, future urban development may be an appropriate long-term land use option. DEDJTR understands that Council has maintained ongoing consultation with local companies about the long-term planning for the sand quarry area and adjacent areas.</p> <p><u>Merrimu Area:</u></p> <p>The southern portion of the Merrimu growth precinct covers the EIIA 884022, which contains sand and gravel resources. We suggest the area of the EIIA covered by the proposed growth precinct is not suitable for developing extractive industries due to fragmented land holdings, sensitive rural residential land uses, access constraints, and topographical limitations.</p>	<p>Design and Development Plan Overlay relating to Camerons Road area, however, it is important that it is also shown on the UGF plans for completeness.</p> <ul style="list-style-type: none"> <li>• Amend the legend on the plans, to remove the words “(subject to further investigation)”.</li> <li>• Emphasise that no sensitive uses are permitted within the buffer areas.</li> <li>• Amend the ‘export-based employment objectives’ (page 42) as follows: <ul style="list-style-type: none"> <li>○ <del>Protect valuable coal and</del> <u>State-significant</u> sand resources at Darley and Coimadai <del>and promote and facilitate appropriate waste and resource recovery infrastructure.</del></li> <li>○ <u>Protect the State-significant Maddingley Brown Coal Waste and Resource Recovery Hub.</u></li> </ul> </li> <li>• Amend the third employment strategy relating to ‘extractive industries’ (page 43), as follows: <ul style="list-style-type: none"> <li>○ Investigate potential new end uses for quarries when sand resources are depleted, <del>such as recycled water storage and residential,</del> and ensure new end uses are managed at the precinct level to ensure compatibility.</li> </ul> </li> </ul> <p><u>Merrimu Area:</u></p> <p>Noted.</p>

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			<p><u>Hopetoun Park Area:</u></p> <p>The Hopetoun Park growth precinct covers the southern section of the Extractive Industry Resource Area 884023, which contains sand and gravel resources. This area is affected by fragmented land holdings and existing sensitive uses located in close proximity to the resource, making extractive industries development an unsuitable option for this location.</p> <p>Council is urged instead to examine other areas of this EIIA where extractive industries could develop without further encroachment from sensitive uses, for example to the north of the Western Freeway. The Resources Division within DEDJTR would be please to work with Council to ascertain the suitability of this locality for extractive industries with a view to redefining new boundaries of this EIIA and securing this as a future extractive resources supply.</p> <p><u>Maddingley/Parwan Areas:</u></p> <p>The Maddingley Employment Investigation Area and the Parwan Employment Growth Precinct both cover the resources, which encompasses the Maddingley Brown Coal operation, a mixed use business which involves small scale resource extraction, landscape supplies and waste management activities. The proposed Parwan Employment Precinct also covers part of the operations of this multi-purpose facility.</p>	<p><u>Hopetoun Park Area:</u></p> <p>It is recommended that that the UGF be amended to include the following additional precinct planning principle, under the heading "Define the northern edge":</p> <ul style="list-style-type: none"> <li>Investigate the extractive industry potential of the sand and gravel resources located within Extractive Industry Interest Area 884023 to the north of the Western Freeway, in consultation with the Resources Division of DEDJTR, and establish an appropriate non-sensitive use buffer to protect the resources.</li> </ul> <p><u>Maddingley/Parwan Areas:</u></p> <p>The UGF (on Plans 1, 3, 4, 5, 6, 7 and 8) shows a "buffer interface required for sensitive uses (subject to further investigation)", which measures 2.0 km from the EPA approved compost processing area (i.e. under EPA Licence 45288; as amended on 22/11/2018) at the Maddingley Brown Coal Waste and Resource Recovery Hub. The 2.0 km buffer is consistent with the EPA Publication 1588.1 'Designing, constructing and operating composting facilities'.</p> <p>However, the UGF plans are a bit vague with respect to delineation and description of the buffer interface. As such, it is recommended that that the UGF be amended as follows:</p>

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			<p><u>Other Matters:</u></p> <p>As you may be aware, DEDJTR is undertaking an initiative with DELWP and in partnership with select Councils to identify strategic extractive resource areas and to recognise these more prominently within the planning system. We would be pleased to discuss this initiative further with Moorabool Shire Council, to</p>	<ul style="list-style-type: none"> <li>• Amend Plans 1, 3, 4, 5, 6, 7 and 8, to show a clearly delineated 2.0 km wide buffer (no sensitive uses permitted) from the EPA approved compost processing area.</li> <li>• Amend the legend on the plans, to remove the words “(subject to further investigation)”.</li> <li>• Emphasise that no sensitive uses are permitted within the buffer areas.</li> <li>• Amend the ‘export-based employment objectives’ (page 42) by adding: <ul style="list-style-type: none"> <li>○ <u>Protect the State-significant Maddingley Brown Coal Waste and Resource Recovery Hub.</u></li> </ul> </li> <li>• Amend the ‘export-based employment strategies’ (page 43), as follows: <ul style="list-style-type: none"> <li>○ Amend the heading ‘Extractive industries’ to ‘Extractive industries, mining and waste and resource recovery’.</li> <li>○ Amend the employment strategies under this heading, as follows: <ul style="list-style-type: none"> <li>• Support <u>the</u> ongoing operation of extractive industries, <u>including State-significant sand quarries, <del>brown coal mine, landfill and composting.</del></u></li> <li>• Support the ongoing operation of the <u>State-significant Maddingley Brown Coal Waste and Resource Recovery Hub.</u></li> </ul> </li> </ul> </li> </ul> <p>Noted</p>

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			<p>explore opportunities for future collaboration to protect key resources, particularly given the growth area planning that is currently underway across Bacchus Marsh.</p>	

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55  (late submission)	101 Gisborne Road, Bacchus Marsh	Comments only	<p>The site is considered a strategically significant land holding for the following reason (but not limited to):</p> <ul style="list-style-type: none"> <li>• The land is a large vacant holding (approx. 3.5ha) in an important gateway location to Bacchus Marsh adjoining Gisborne Road, Western Highway and the Lerderderg Track.</li> <li>• Has frontage to Gisborne Road and connection to the Western Freeway.</li> <li>• Adjacent to existing commercial land uses south of the site with the ability to reinforce and improve the convenience and service offering at this intersection.</li> <li>• The land is capable of accommodating an integrated development comprising medium density housing capable of providing much needed housing diversity and choice and reinforcing the role of Bacchus Marsh as a regional city.</li> <li>• The land can also support a range of convenience and supported uses along the Gisborne Road frontage.</li> <li>• Existing Southern Rural Water open drainage infrastructure on the land is able to be undergrounded and used to create a linear shared path connection from the town centre through to Darley including utilising the Lerderderg Track. Noting that there are currently limited north-south pedestrian and cycle connections available.</li> <li>• The land is relatively flat and vacant, has access to all necessary infrastructure and free from major environmental constraints.</li> </ul> <p>On the basis that the land is a suitable candidate for an integrated development, we request that:</p>	<p>The subject land is currently within the General Residential Zone (GRZ). A previous planning scheme amendment (C71) proposed to rezone the land to Commercial 2 Zone, to facilitate the development of a Bunnings Warehouse and other bulky goods retail stores. On 25 November 2015, Council considered submissions received in relation to Amendment C71 and resolved to abandon the amendment.</p> <p>It is acknowledged that the location and size of this site offers good potential for medium density housing. The site could also offer some potential for other uses, subject to consideration under the relevant planning controls. The GRZ provisions list a number of non-residential uses which may be possible either with or without a planning permit, such as medical centre, convenience shop, food and drink premises, leisure and recreation, place of assembly, plant nursery.</p> <p>There is currently no strategic justification to rezone this site. However, a proponent could potentially lodge a request for a planning scheme amendment to rezone the land. Any such amendment request would need to provide sound strategic justification, and would need to be supported by a detailed response to the <i>'Strategic Assessment Guidelines for preparing and evaluating planning scheme amendments'</i> (Planning Practice Note 46).</p>

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			<p>Plan 6 of the Bacchus Marsh UGF and background report be amended to nominate the subject land as a <u>'key development site – potential for medium density housing and supporting uses'</u>.</p>	<p>Not supported. The UGF mapping is more high level. Plan 6 identifies <i>'existing greenfield residential development'</i> areas. The subject site is an infill site rather than a greenfield site. It would not be possible to identify all infill sites on Plan 6, given the very small scale of the mapping. This is more a matter for consideration via Amendment C79 and the Bacchus Marsh Housing Strategy.</p>

