

18 April 2024

Dean Rochfort  
Executive Director, Regional Victoria  
Victorian Planning Authority  
Level 25, 35 Collins Street  
MELBOURNE VIC 3000



Our Ref: REQ004322

Dear Dean,

**RE: GREATER SHEPPARTON PLANNING SCHEME AMENDMENT C117GSHE – SHEPPARTON SOUTH EAST PRECINCT STRUCTURE PLAN**

EPA provided a written submission to the Victorian Planning Authority (VPA) regarding the Shepparton South East Precinct Structure Plan (dated 8 April 2024).

However, it has come to our attention that there was an error in our previous submission regarding sodic soils. Please refer to the below submission which forms an addendum and replaces previous comments with respect to sodic soils.

**Comparison against previous comments**

The table below compares the exhibited provisions with EPA's comments, with respect to sodic soils, offering conclusions on whether the recommendations have been addressed (refer to the legend for summary classification).

*Legend:*

- |    |                     |
|----|---------------------|
| 1. | No further comments |
| 2. | Matter outstanding  |

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Environment Protection Authority Victoria  
GPO Box 4395, Melbourne VIC 3001  
1300 372 842



Topic	EPA MD19 response dated 6 July 2022	Exhibited amendment, 12 February 2024	EPAs submission
<b>Sodic Soils</b>	<p>Table 3-2 in the LCA provides a summary of geological and soil conditions across the Precinct, and includes the following:</p> <ul style="list-style-type: none"> <li>• <i>Soil Order 1 - Sodosols (CSIRO Atlas of Australian Soils). Soils across the site are likely to comprise texture contrast soils with dense sodic (alkaline) subsoils (VRO).</i></li> <li>• <i>Soil Order 2 – Vertosols (CSIRO Atlas of Australian Soils).</i></li> </ul> <p>EPA understands that both sodosols and vertosols can be sodic and dispersive. Based on our review of the PSA documents it doesn't appear that any further consideration of this risk has or is proposed to be investigated, and therefore whether the management of potential issues that arise if the soils are disturbed, have been considered.</p> <p>EPA sought clarification of the assessment of this risk and considered it would be appropriate to supply data to support this assessment.</p>	<p>Schedule 2 To the Urban Growth Zone has been updated to include the following requirement under Clause 3.0 <i>application requirements</i>:</p> <p><b>'Sodic and dispersive soils management plan</b></p> <p>An application to subdivide land or construct or carry out bulk earthworks, a sodic and dispersive soils management plan must be prepared by a suitability qualified professional, that describes: ...'</p> <p>And Clause 4.0 requires:</p> <p><b>'Requirement – sodic and dispersive soil site management plan</b></p> <p>A permit to subdivide land or to undertake earthworks must include a condition that requires a site management plan be prepared that implements the recommendations identified in the sodic and dispersive soil management plan, to the satisfaction of the Responsible Authority'.</p>	<p>EPA had previously requested that further information be provided by VPA regarding:</p> <ol style="list-style-type: none"> <li>1) clarification of the assessment of the sodic soils risk; and,</li> <li>2) any supporting data regarding this assessment.</li> </ol> <p>In October 2022 (EPA Ref: REQ002576), at VPA's request, EPA provided a general letter (attached to this addendum), which set out the recommended approach to addressing sodic soils.</p> <p>EPA highlight that:</p> <ol style="list-style-type: none"> <li>1) no further clarification of the assessment of the sodic soils was provided by the VPA; and</li> <li>2) the approach set out in the exhibited amendment documents is contrary to the advice EPA provided in October 2022, which in summary is that: <ol style="list-style-type: none"> <li>a. a sodic soils assessment should be undertaken as early as possible in the planning process, and at a precinct-wide level.</li> <li>b. The sodic soils assessment should identify risks, and dependent on the outcome of the assessment, feed into a sodic soils management plan that mitigates the risks associated with loss of soil and soil structure so far as reasonably practicable.</li> <li>c. Management approaches identified in the sodic soils management plan should be included as planning controls which will result in conditions on any permit issued.</li> <li>d. A piece-meal approach to sodic soil management conducted at a subdivision</li> </ol> </li> </ol>

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	<p data-bbox="1444 217 2036 284">level may elevate the risk of harm from sodic soils in the precinct.</p> <p data-bbox="1321 323 2036 568">In summary, EPA does not consider that the risk posed by sodic soils is properly understood and therefore is not adequately addressed in the exhibited amendment documents. Instead, assessment of the risk has been differed to the planning permit stage, which is contrary to the advice previously provided to VPA.</p>		

**Closing**

Should the matter be referred to a planning panel, we request that this submission is provided to the panel.

If you need additional information or would like to discuss this matter further, please contact Mychelle Tomsett, Senior Planning Advisor on [REDACTED]

Yours sincerely,

[REDACTED]

Kristen Argus  
Strategic Planning Team Leader– Strategic Planning Advisory  
Development Advisory  
EPA Victoria