



11 June 2025

To:

Victorian Planning Authority
GPO Box 2392
Melbourne VIC 3001
BannockburnSE@vpa.vic.gov.au

Re: Feedback Submission – Bannockburn South East Precinct Structure Plan (April 2025)

Dear VPA team,

I am writing to formally lodge my feedback regarding the *Bannockburn South East Precinct Structure Plan (April 2025)*. This submission is made in response to the current public consultation process. I wish to express my serious concerns and strong opposition to the proposed development, highlighting the numerous adverse consequences this plan will likely have on Bannockburn and its broader community.

1. DESTRUCTION OF TOWN CHARACTER AND RURAL IDENTITY

The proposed PSP promotes large-scale urbanisation and high-density development, which is fundamentally at odds with Bannockburn's existing rural lifestyle and open township character. The addition of 4,685 dwellings and a projected population increase of nearly 14,000 people represents a drastic transformation that risks overwhelming the town's identity. This plan undermines the core reason many residents choose to live here: peace, space, and a connection to a rural environment.

2. UNREALISTIC INFRASTRUCTURE PROMISES

The plan outlines a wide range of infrastructure "aspirations" including roads, active transport networks, community facilities, and green corridors. However, the feasibility, timing, and funding of these elements are vague and uncertain. Community infrastructure such as schools, local parks, and recreation facilities are vaguely staged and lack binding delivery timelines, leaving the community exposed to infrastructure lag behind population growth.

3. SIGNIFICANT ENVIRONMENTAL RISK

Bruce Creek, an area identified for its "ecological and intrinsic cultural values," is at extreme risk of being degraded. Despite intentions to "enhance" the area, the plan proposes infrastructure (including a bridge crossing and stormwater infrastructure) through sensitive creek corridors and culturally significant zones. This approach is not only inconsistent with genuine conservation but may irreversibly impact biodiversity, local fauna habitat (including the Growling Grass Frog), and the cultural values of the Wadawurrung people.

4. INSUFFICIENT BUFFERS FROM EXISTING INDUSTRIAL USES

The presence of a hatchery and breeder farm near the southern boundary raises substantial concerns. The plan acknowledges the need for buffers, yet proposes long-term residential rezoning in direct proximity, gambling on potential future cessation of farming operations. This speculative approach jeopardises residents' amenity, safety, and health, and exposes local industry to incompatible land use pressures.

5. TRAFFIC CONGESTION AND CONNECTIVITY FAILURES

The precinct's road network, particularly the new east-west link road and proposed bridge, is not adequately supported by detailed traffic modelling. Existing roads like Burnside and Levy are ill-equipped to handle the projected surge in traffic volumes. The plan's ambition to divert traffic away from High Street appears thin, and risks creating new congestion hotspots, particularly around school zones and the proposed town centre.

6. QUESTIONABLE HOUSING STRATEGY AND SOCIAL OUTCOMES

The housing mix leans heavily toward "target typologies" that prioritise medium to high density forms. This is not compatible with existing community expectations or the character of the surrounding region. The minimum 6.5% target for affordable housing is far too low and ambiguous in its implementation, raising concerns over social inequity and economic segregation.

7. INADEQUATE BUSHFIRE RISK MITIGATION

While Plan 8 addresses bushfire hazards, the rapid development of this precinct in proximity to grassland interfaces without enforceable and detailed fire management strategies is reckless. Setbacks, perimeter roads, and vegetation management plans are referenced, but enforcement mechanisms are weak and reliant on multiple authorities agreeing, something notoriously difficult during real-world implementation.

8. LACK OF TRANSPARENCY AND COMMUNITY-LED VISION

Despite extensive documentation, much of the language in the PSP is aspirational, vague, or filled with planning jargon. There is no clear evidence of substantial grassroots community engagement shaping the PSP's core direction. Instead, the plan appears to be driven by regional housing targets and growth forecasts, rather than the lived experiences and aspirations of existing Bannockburn residents.

9. GUIDELINES OFFER LITTLE ASSURANCE WITHOUT ENFORCEMENT

The structure plan relies heavily on "guidelines" rather than enforceable requirements. This is problematic. Guidelines are easily ignored, especially when developers can argue that alternative approaches meet the "intent." Without mandatory conditions, key outcomes, like walkable streets, sustainable design, and environmental protection, become optional rather than guaranteed.

10. HIGH RISK OF FRAGMENTED, ISOLATED DEVELOPMENT

There is insufficient clarity on how development will be sequenced. This creates a high risk of disconnected, piecemeal construction, where new housing appears before services, roads, or public transport. That kind of fragmented rollout leaves early residents isolated and under-serviced. We've seen this play out in other growth areas, and Bannockburn should not repeat the same mistake.

11. RISK OF DEVALUATION TO EXISTING PROPERTIES

The scale and structure of this development could directly impact existing property values in Bannockburn. A sudden oversupply of housing, particularly if dominated by small-lot and medium-density typologies, may reduce the scarcity and desirability that currently underpin the local property market. In addition, the potential

for mismatched development near established homes, poorly integrated interfaces, or proximity to infrastructure like drainage reserves or buffer zones can diminish amenity and curb appeal. If community services and infrastructure fail to keep pace, the overall quality of life in the area may decline, further affecting buyer confidence and investor interest. Residents who have invested in the town for its rural character and lifestyle should not be penalised through planning decisions that undercut long-term value.

12. UNDERESTIMATION OF STRAIN ON LOCAL COUNCIL SERVICES

Golden Plains Shire is a small, rural council. The scale of what is proposed in this PSP will place an enormous burden on the Shire's capacity to deliver and maintain roads, waste services, parks, community facilities, and local programs. Without long-term resourcing and support from the state, service levels will drop and ratepayers will feel the impact.

13. JOBS STRATEGY IS UNCONVINCING

While the PSP talks about local employment, there is no clear economic driver within the precinct. Aside from a modest local centre and a few community facilities, most residents will need to commute for work. This undermines the idea of a "20-minute neighbourhood" and increases reliance on car travel, putting further pressure on roads and reducing local resilience.

14. STORMWATER AND DRAINAGE MANAGEMENT ARE UNCLEAR

Parts of the site include flat terrain, sodic and dispersive soils, and proximity to environmentally sensitive waterways. The drainage solutions proposed are vague and aspirational. There is no detailed modelling or guarantee that stormwater infrastructure will be delivered ahead of development. This raises concerns about erosion, flooding, and environmental damage downstream.

15. CULTURAL HERITAGE PROTECTION IS WEAKLY DEFINED

Although the plan refers to Wadawurrung values and includes general commitments to "consultation," there is no formal mechanism that ensures co-management or binding decision-making by Traditional Owners. Important cultural landscapes, like Bruce Creek and the Stony Rises, may still be compromised without enforceable protection measures.

16. CLIMATE RESILIENCE MEASURES ARE LACKING IN DETAIL

The PSP gestures at sustainability, but the actions are light. Tree canopy targets, WSUD, and passive irrigation are mentioned, but not clearly tied to funding, enforcement, or design standards. There's no serious strategy to manage urban heat, reduce emissions, or improve energy efficiency. In a time of growing climate pressure, this is a significant gap.

17. CONVERSION OF PRODUCTIVE RURAL LAND

Much of the land proposed for development is currently used for agriculture. Replacing viable farmland with suburban housing undermines local food production and contributes to the creeping loss of rural land across the region. Long-term planning should seek to protect productive agricultural landscapes.

18. OVERUSE OF JARGON MASKS COMMUNITY IMPACT

The language throughout the PSP is dense with planning terminology. Terms like "place-based outcomes," "activated corridors," and "amenity catchments" obscure the fact that this is essentially a high-volume housing estate. This kind of jargon-heavy communication makes it harder for the community to meaningfully engage or push back on real issues.

19. GOVERNANCE AND DELIVERY RESPONSIBILITY IS VAGUE

The plan lacks detail on who will be responsible for ensuring the various parts of the PSP are delivered on time, to standard, and with community input. There is no clear delivery authority or oversight framework. In practice, this creates confusion, buck-passing, and risks that critical infrastructure will lag years behind population growth.

In conclusion the *Bannockburn South East Precinct Structure Plan (April 2025)* poses a serious threat to the long-term sustainability, identity, and wellbeing of the Bannockburn community. Its proposed scale, housing density, and infrastructure expectations are fundamentally incompatible with the town's rural character, environmental values, and limited-service capacity.

Rather than supporting thoughtful regional growth, this plan risks repeating the worst outcomes of unchecked suburban sprawl, overloaded infrastructure, disconnected communities, loss of natural and cultural assets, and the erosion of local quality of life. It also introduces significant financial risk to existing residents, with the potential for property devaluation if housing oversupply, poor staging, and amenity decline take hold.

I strongly urge the Victorian Planning Authority to withdraw or significantly revise this plan. Any future strategy must begin with genuine community engagement, realistic infrastructure commitments, and a planning vision that protects what makes Bannockburn unique. The needs, values, and long-term interests of the existing community must come first.

Sincerely,

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