



# BANNOCKBURN SOUTH EAST PRECINCT STRUCTURE PLAN

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Draft Amendment C107gpla Exhibited Documentation  
Ramsey Property Group Submission  
June 2025

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# RPG VISION

Bannockburn South East offers residents and visitors a unique rural experience and an inclusive, vibrant and healthy neighbourhood.

Bannockburn's distinct **rural character** is expressed through a sense of openness **using natural materials such as local timber** with neighbourhoods connected to the beautiful natural environment via a series of **interlinked walking and cycling trails**.

The stories and sites of the Wadawurrung peoples are acknowledged throughout the waterways and walking trails, and the creation of biodiverse urban green spaces deliver community and nature connections as sustainability underpins life in Bannockburn South East.

# EXECUTIVE SUMMARY

**RPG** commends the VPA for preparing the PSP and DCP. We have been fortunate to actively engage in establishing the vision and urban growth objectives for the growth area and the enquiry by design to determine its future urban structure. We have been working collaboratively with the key landowners within the precinct alongside the VPA and Council since 2019.

We have identified eight key changes related to our landholdings that improve the land use efficiency and address the high DCP rate. In our submission, the following changes should be made:

1. The adoption of Neil Craigie's drainage strategy reducing land take and construction of drainage infrastructure the precinct increasing housing affordability in the precinct.
2. The removal of Community Facility CL-01 to address the excessive DCP Rate in line with the strategic intention of the Growth Plan.
3. A rationalisation of the eastern Active Open Space SR-02 to address the need to increase the extent of net developable land in the precinct
4. The removal of the BR-01 Bridge across Bruce Creek as this will not be delivered in the time horizon of the PSP and the lack of nexus for the residents' utilisation of the bridge.
5. The downgrade of intersection IN-01 and IN-03 and removal of the cost apportionment of the arterial road west of IN-01 and east of IN-03 as these will not be required to be constructed until future connections are provided.
6. The rationalisation of SR-01 & SR-03 and the utilisation of the transmission lines for active open space in line with Appendix 6: Transmission easement design outcomes but maximising the active open space uses within the transmission easement.
7. Inclusion of the sensitive areas in the DCP Calculation to address excessive DCP and limited NDA
8. Removal of Moderate retention trees which are considered noxious weeds by State Government

In addition to these requested changes, we provide precinct-scale commentary on three specific matters of concern in relation to the Bannockburn PSP, those being:

9. The proposed residential density targets, and the location and extent of the amenity areas
10. The quantum and mechanism for social and affordable housing
11. Removing the Hatchery Buffer

Lastly, we have provided a detailed table outlining specific changes which have been prepared collectively by the three key landowners who have been working closely to ensure the commercial viability and deliverability of the Precinct.

We look forward to working with the VPA to deliver an inclusive, vibrant and healthy neighbourhood.

# INTRODUCTION & STRUCTURE OF SUBMISSION

Ramsey Property Group (RPG) welcomes the opportunity to provide a response and statement of broad support for Amendment C107gpla implementation of the Bannockburn South East Precinct Structure Plan (Bannockburn SE PSP) and associated Documentation. **We commend The Victorian Planning Authority (VPA) and the Golden Plains Shire Council (Council) on their work preparing the draft Bannockburn SE PSP** to guide the sustainable development of Bannockburn.

RPG has enjoyed its long-term association with the ongoing planning of the Bannockburn South East PSP from the commencement of the Bannockburn Growth Plan in November 2019 to its completion in September 2021 and throughout the subsequent detailed planning of the Bannockburn SE PSP. We have been fortunate to actively engage in establishing the vision and urban growth objectives for the PSP, as well as engaging in an enquiry by design to determine its future urban structure with the VPA during this period.

**We have identified eleven key recommendations and a table of delivery changes that we seek to improve the amendment and enable the effective delivery of the precinct.**

The structure of this submission is as follows:

Part 1 – Requested Key Placed Base Plan PSP & DCP Changes

Part 2 – Table of Suggested Changes throughout the Bannockburn SE PSP and associated Documentation

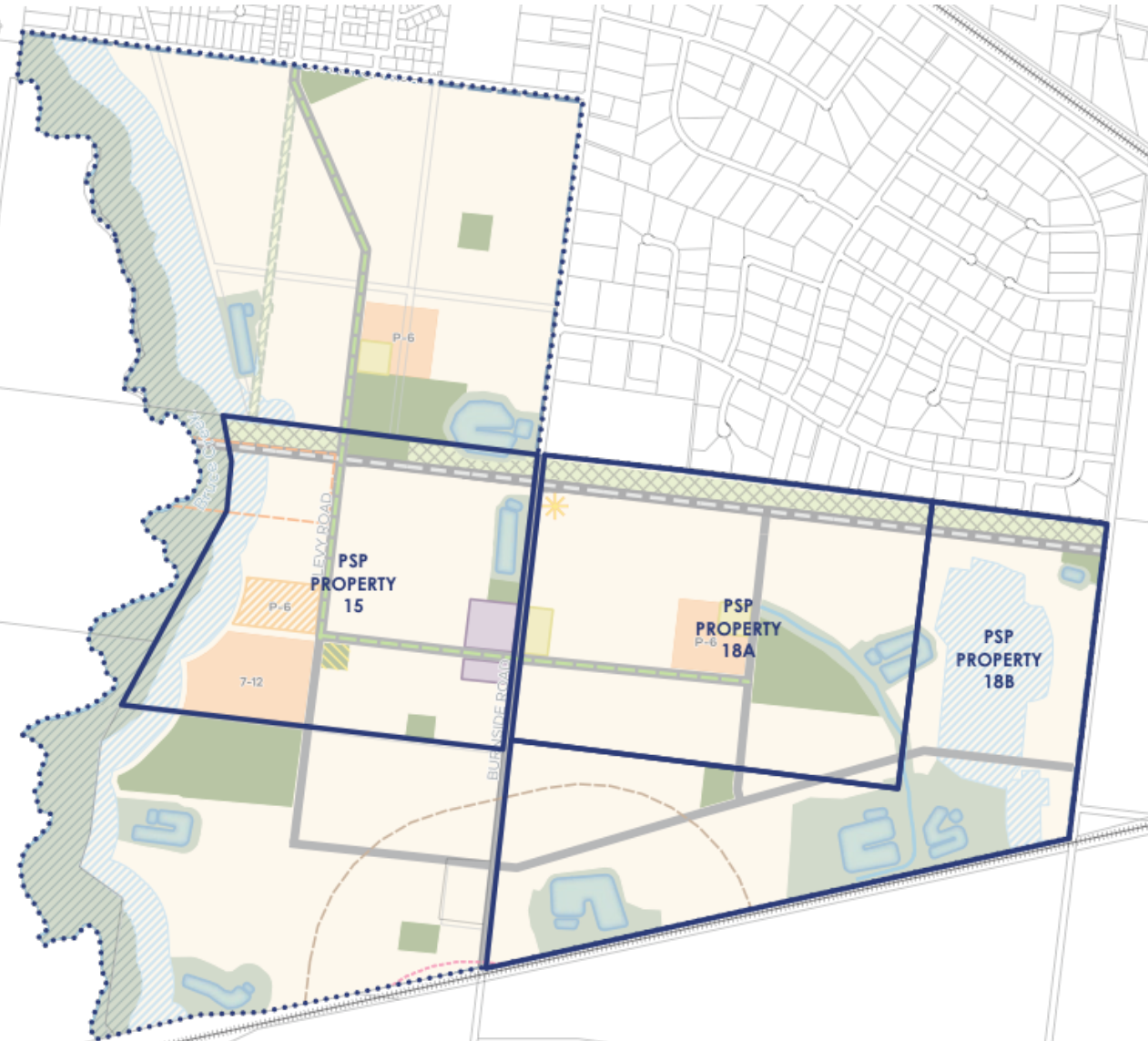
Part 3 – Summary

Part 4 – Supporting Documentation

RPG has been rezoning and subdividing land into homes for families in the Geelong and Bellarine region since 1983 and has been working in close collaboration with the Golden Plains Shire since 1995. Our first development in Golden Plains Shire was the Dog Rocks Estate, described by the 2001 Batesford Structure Plan as "a distinctive feature of Batesford." Since that time, we have completed several estates across Batesford, Bannockburn and Inverleigh, including the Riverstone Estate, Glenmore Estate, Willowbrae Estate, Mannagum Estate and Barrabool Views. We take pride in our work, which respects the region's beautiful natural environment.

# RPG's Landholding in the PSP

RPG's combined landholding comprises **274.47 hectares of gross development land** in the Bannockburn South East precinct, which is approximately **52% of the total precinct area**.





# PART 1 | REQUESTED KEY CHANGES TO THE PLACED BASED PLAN PSP & DCP

# REQUESTED CHANGE #1: ALTERNATE DRAINAGE STRATEGY

## CONTEXT

The current drainage strategy has 54Ha of waterway and drainage reserve within the precinct with a total cost of \$99,264,832, which equates to 30% of the total DCP.

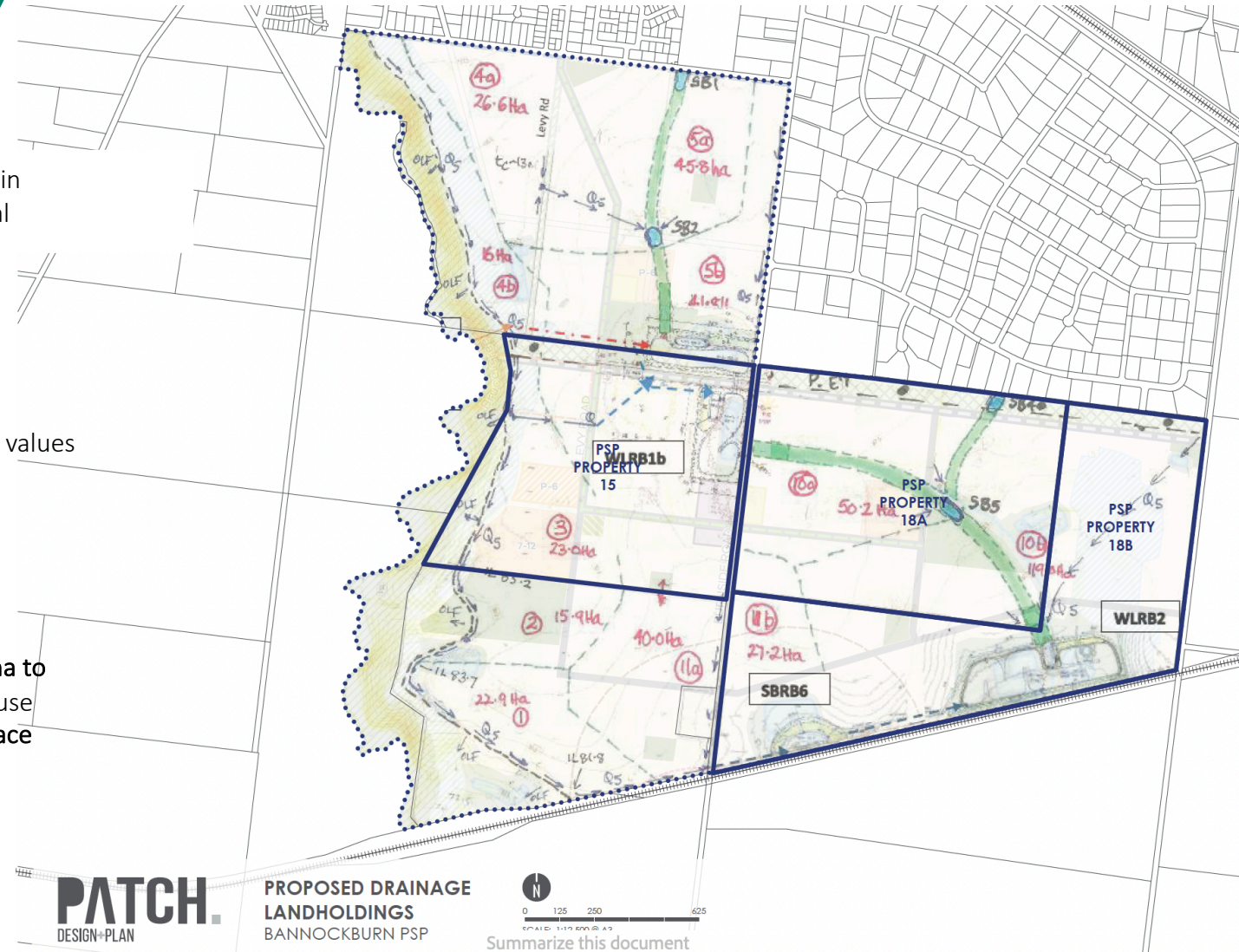
## ISSUE

- Drainage is 17% of the NDA
- \$320,809 p/NDA Ha drainage contribution to the DCP
- Basins located adjacent to Bruce Creek have cultural values and ecological values
- Vic Track do not support the current proposal

## REQUESTED CHANGE

Adopt the Neil Craigie Drainage Strategy which reduces the land take from 54ha to 33Ha and reduces the construction costs by 33%. This is a more efficient land use and will result in a reduction to the DCP of \$167,117 p/NDA Ha. Amend the Place Based Plan to reflect the alternative drainage strategy.

See attached Memo from Neil Craigie in Appendix 1



# REQUESTED CHANGE #2: REMOVE CL-01

## CONTEXT

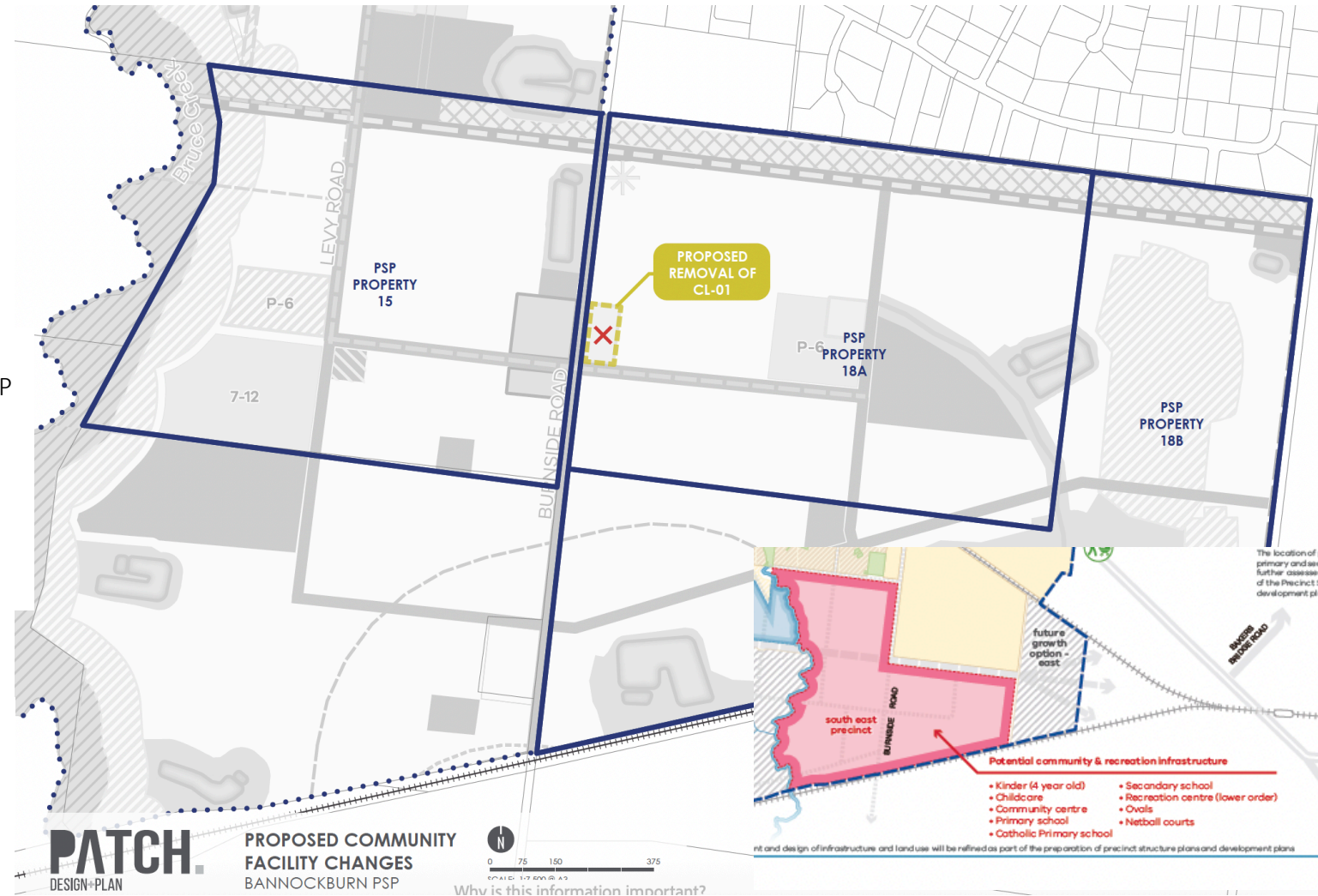
CL-01 is a community facility that is not co-located with a school or active open space. There are also three other nearby community facilities within the PSP. A total of 3 community facilities and 1 Indoor Recreation Centre have been identified on the Placed Base Plan.

## ISSUE

- There is an over provision of community facilities
- \$139,000 p/NDA Ha community facilities contribution to the DCP
- It is not co-located with a school or open space
- Location will give community expectation of early delivery
- Within 800m radius of two other community facilities and an indoor recreation centre
- There is no strategic justification in the Growth Plan for 3 community facilities

## REQUESTED CHANGE

Remove CL-01 and update costs to benchmark cost for community facilities. This is a more efficient land use and will result in a reduction to the DCP of \$126,098 p/NDA Ha.



# REQUESTED CHANGE #3: REDUCE SR-02

## CONTEXT

There are three active open space areas in the Precinct. The indicative open space design for SR-02, Sketch 2 prepared by Taylors, as shown in Appendix B of the Bannockburn DCP Document (pg 66) utilises 3 Ha of the 6 Ha of proposed reserve with the remaining 3 Ha not being utilised. Further, there is no funding allocation in the DCP for the remaining 3Ha of open space.

## ISSUE

- There is an over provision of active open space, which contributes to the significant DCP.
- The remaining open space portion has no funding allocated to activate it.
- \$258,158 p/NDA Ha Recreation provision contribution to the DCP

## REQUESTED CHANGE

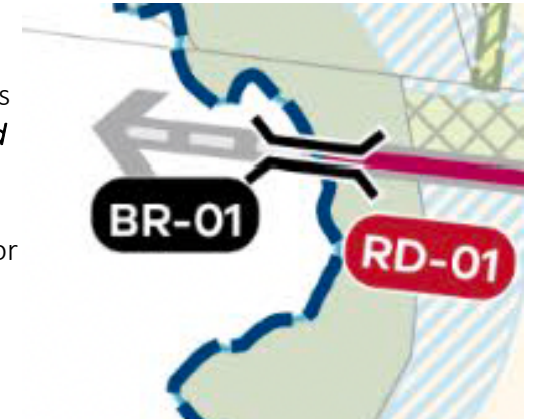
**Reduce SR-002 from 6Ha to 3Ha.** This is a more efficient land use and will result in a reduction to the DCP of \$28,039 p/NDA Ha. Remove the 3 hectare portion of the active open space that has no facilities on it, in accordance with Taylors plan, sketch 2.



# REQUESTED CHANGE #4: REMOVE BR-01 FROM DCP

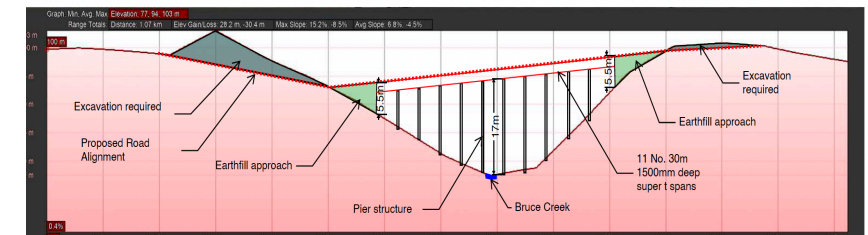
## CONTEXT

This bridge proposed between the Bannockburn SE PSP and the Future Growth Option South will not be delivered in the time horizon of this PSP. VPA Infrastructure Development Staging Plan Background Document April 2025 states that the *“Road Bridges BR-01 should be delivered to align with the development of the Bannockburn South West Precinct and Future Growth Option South. Anticipated need is long term.”* The Jacob’s report identified 2 bridge design options with Option 2 proposed for DCP contribution instead of Option 1 which is far less expensive and noting, the cost of Option 1 has been omitted from the Jacob’s report exhibited. Furthermore, the traffic reports prepared for the Growth Plan and the PSP suggest approximately 13% of the traffic usage of the bridge in the final design will be generated by this PSP.

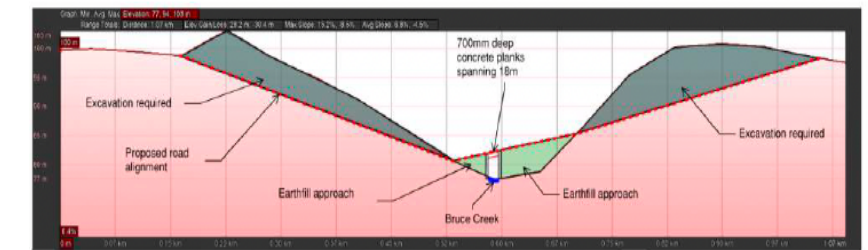


## ISSUE

- The bridge will not be delivered in the time horizon of this PSP.
- The bridge included in the DCP corresponds to Option 2 in the Jacobs report and is costed at \$79,984,050; however, the smaller and more cost-effective alternative Option 1 could be delivered
- The anticipated use of the bridge by future residents in this precinct is very limited, highlighting a weak nexus between the bridge infrastructure requirement and the precinct.
- Numerous reports have been commissioned in response to longstanding concerns about heavy haulage trucks using the main street of the township; the significant cost of delivering an alternative arterial road to address this existing issue should not be transferred to this precinct, which is not the source of the problem



Option 2 – Higher Bridge



Option 1 – Lower Bridge

## REQUESTED CHANGE

Remove cost of bridge BR-01 construction from the PSP. This will result in a reduction to the DCP of \$129,248 p/NDA Ha. Alternatively apportionment of the bridge needs to be in accordance with the traffic volumes generated by the precinct over the bridge and adopt Jacobs Option 1 which is more cost effective.

# REQUESTED CHANGE #5: DOWNGRADE INTERSECTIONS & REMOVE PARTIAL CONSTRUCTION ARTERIAL

## CONTEXT

The cost allocated to the arterial road and intersections is \$39,278,151 which is contributing to the significant DCP rate.

The benchmark costs for the road infrastructure associated with the Arterial road are extremely high. Further, all three intersections have the same costing, even though they differ.

## ISSUE

There is no proposed development frontage along the section of the arterial road east of IN-03 and west of IN-01. As such, these segments will remain unused until bridges are constructed in both directions.

Premature construction of these road sections is not recommended, as the absence of traffic over an extended period will likely result in early pavement deterioration due to insufficient compaction typically provided by vehicular loading.



## REQUESTED CHANGE

Reducing the intersections and removing the sections of the road which will not be used in the short to medium term will reduce the DCP for transport to \$18,586,681.

- Remove RD-01 west of IN-01
- Remove RD-01 east of IN-03
- Reduce IN-01 to three way unsignalized intersection
- Reduce IN-03 to a two way unsignalized intersection
- Increase the land take for the R1-01 from 2.87Ha to 3.59Ha in accordance with Creo Memo, as there appears to be an error in land area calculation

This is a more efficient land & infrastructure proposal and will result in a **reduction to the DCP of \$66,872 p/NDA Ha.**

See attached Memo from Creo Consulting in Appendix 2

# REQUESTED CHANGE #6: REDUCE SR-01 & SR-03 & BETTER UTILISATION OF TRANSMISSION EASEMENT

## CONTEXT

There are three active open space areas in the Precinct. The indicative open space design for SR-02, Sketch 2 prepared by Taylor as shown in Appendix B of the Bannockburn DCP Document (pg 66) utilises 3 Ha of the 6 Ha of proposed reserve with the remaining 3 Ha not being utilised. Further, there is no funding allocation in the DCP for the remaining 3Ha of open space.

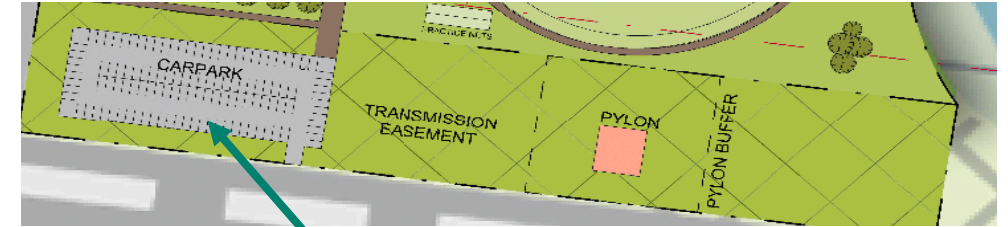
## ISSUE

- There is an over provision of active open space, which contributes to the significant DCP.
- The remaining open space portion has no funding allocated to activate it.
- The Active Open Space under the transmission easement significantly under utilizes the easement despite Ausnet Guidelines allowing many active open space uses within the easement as noted here.

## REQUESTED CHANGE

- There is an over provision of active open space, which contributes to the significant DCP.
- Reduce size of both SR-01 and SR-03 by half in line with the reduction of SR-02
- Utilise the transmission easement for active open space facilities in line with Ausnet Guide

See attached Memo from Bryan Scott of Ausnet in Appendix 4



**Current Proposed Use is only car parking within transmission easement**

### AUSNET PERMITTED USES

>> **Non-metallic fences** up to three metres in height. Metallic fences, or fences incorporating metallic materials, must be suitably earthed and sectionalised and are subject to AusNet Services' approval.

>> **Tennis courts** on 500 kV and 330 kV easements subject to certain specific requirements.

>> An elevated earthed **umpire's chair** is also permitted, provided that it is earthed, of all-metal construction, with a metal screen above the seating position. Perimeter fences should also be earthed.

>> **Ground level sporting activities, such as football, cricket, golf, basketball and netball**, subject to special requirements regarding the design of fences, goals and lights.

>> **Lighting poles**, subject to sufficient clearance to the conductors and towers. The power supply must be underground and the lighting poles must lower to the ground for servicing.

# REQUESTED CHANGE #7: INCLUDE SENSITIVE AREAS IN DCP CALCULATION

## CONTEXT

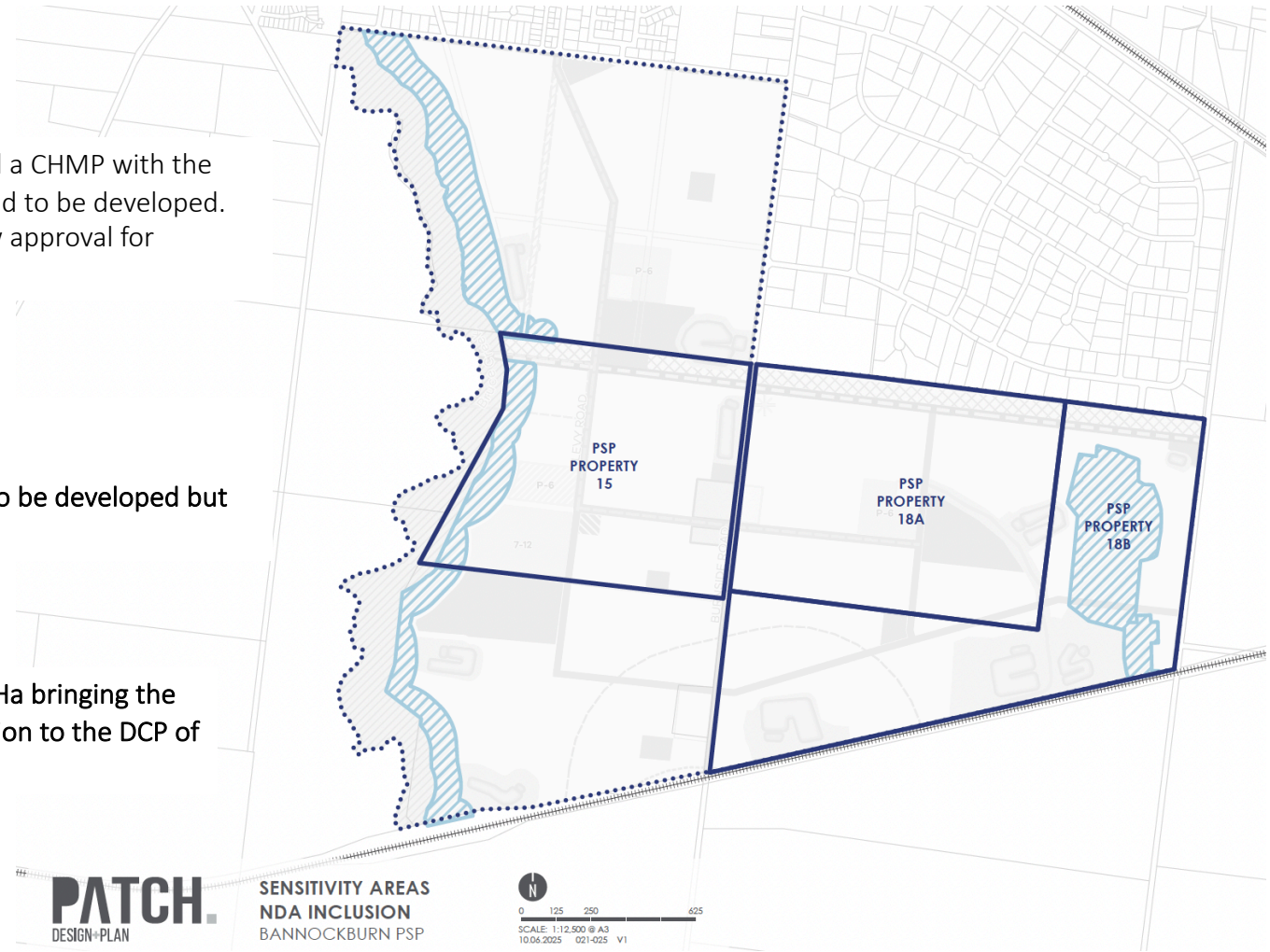
The sensitive areas will be subject to a process with DEECA under the EPBC Act and a CHMP with the Waddawurrung. However, neither of these processes exclude the ability for this land to be developed. Both processes have a clear pathways under the EPBC Act and the AAV Act to allow approval for development.

## ISSUE

- The DCP rate is significantly higher than the standard DCP and isn't viable.
- The sensitive areas are 14% of the NDA of the PSP
- There is no precedent for excluding the sensitive areas which might be able to be developed but won't contribute to the DCP.

## REQUESTED CHANGE

Inclusion of the sensitive areas in the DCP calculation will increase NDA by 49.55 Ha bringing the total NDA to 358.95Ha. This is a more efficient land use and will result in a reduction to the DCP of \$134,535 p/NDA Ha.



# REQUESTED CHANGE #8: REMOVAL OF MODERATE VALUE TREES

## CONTEXT

The moderate retention trees within our landholding have previously been identified as weeds & noxious. Request removal from the plan as it will unnecessarily complicate the statutory planning process.

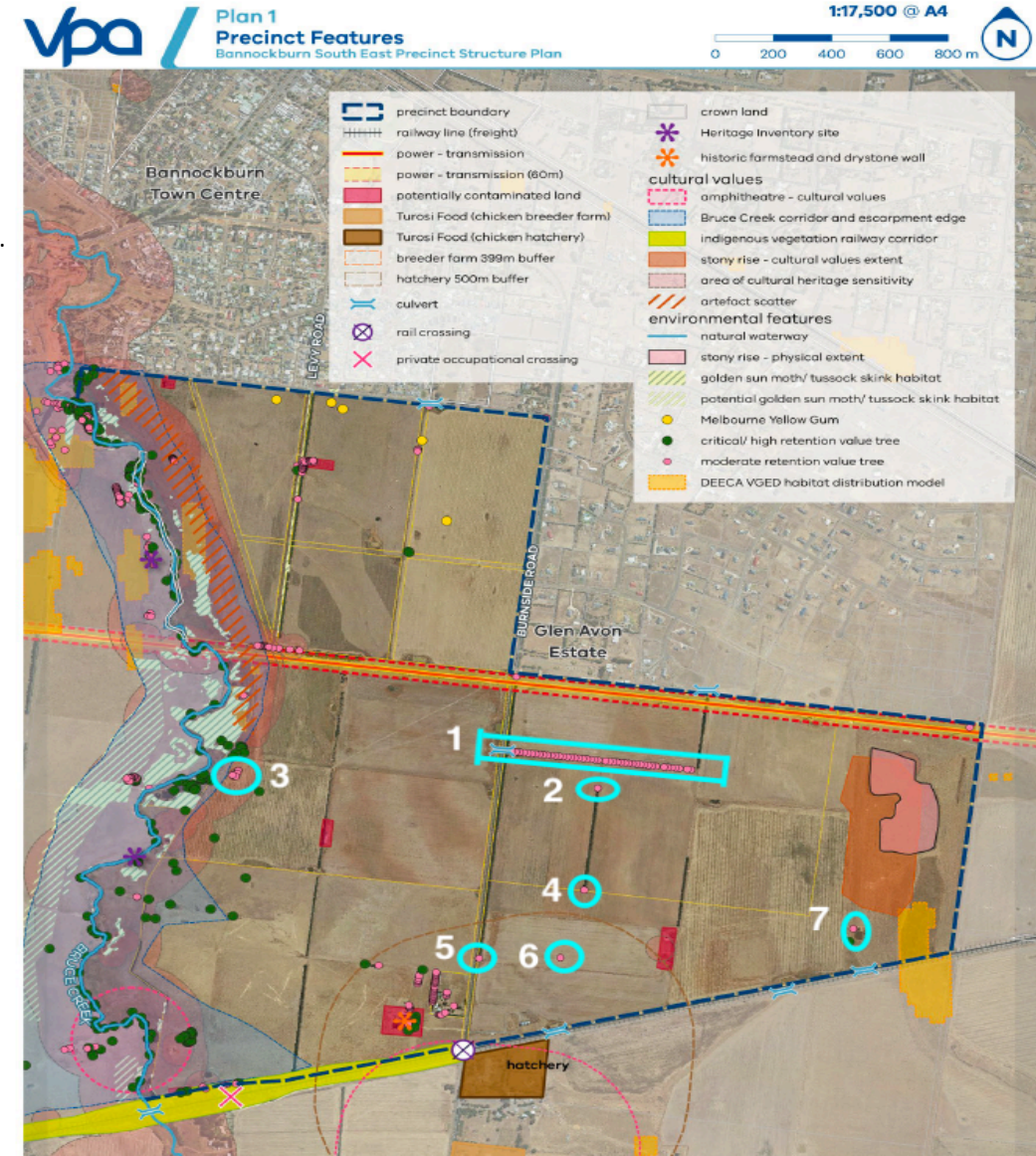
## ISSUE

- 1 – Row of Desert Ash (*Fraxinus angustifolia* subsp. *Angustifolia*) is listed as an environmental weed of Very High Risk in Victoria.
- 2 & 4 – These trees are Monterey Cypress (*Hesperocyparis acrocarpa*) & are listed as environmental weeds in Victoria by DELWP
- 3 – These Pepper Trees (*Schinus molle*) and Monterey Cypress (*Hesperocyparis acrocarpa*) are both listed as environmental weeds in Victoria by DELWP
- 5 & 6 - These Monterey Cypress (*Hesperocyparis acrocarpa*) are listed as environmental weeds in Victoria by DELWP
- 7 - The Weeping Willow (*Salix babylonica*) is listed as a noxious weed and is restricted in Victoria under the catchment and land protection act and the Sugar Gum is listed as an environmental weed.

## REQUESTED CHANGE

Remove all moderate retention trees within our landholding from the plan.

See attached submission in Appendix 3



# COST IMPLICATIONS TO DCP BY IMPLEMENTING REQUESTED CHANGES

Category	Project Type	Exhibited DIL p NDHa (309.42)	Proposed DIL p NDHa (390.77)
Road	Land	\$6,492	\$5,140
	Construction	\$38,543	\$30,519
Intersection	Land	\$9,820	\$7,776
	Construction	\$70,279	\$37,768
Bridge	Land	\$0	\$0
	Construction	\$131,056	\$1,341
Community Facilities	Land	\$20,159	\$11,561
	Construction	\$118,842	\$53,282
Active Recreation	Land	\$104,874	\$41,521
	Construction	\$153,285	\$85,066
Drainage	Land	\$106,253	\$35,827
	Construction	\$214,556	\$56,064
TOTAL		\$974,158	\$365,862.81

# REQUESTED CHANGE #9: REMOVAL OF AMENITY AREA & AMEND DENSITY TARGETS

## CONTEXT

There is currently 43% of the NDA in the precinct is in an amenity area requiring delivery of 17dw/Ha.

## ISSUE

- Concentrating high-density development in certain locations results in clustering of smaller, more affordable dwellings in a single area, leading to socio-economic segregation within the precinct.
- This uneven distribution contributes to a lack of housing diversity, with limited opportunities for a mix of housing types and price points across the broader precinct.
- The current quantum of high-density housing is excessive and undermines the objective of delivering a balanced, integrated community.
- A more even and strategic distribution of density is needed to ensure a variety of housing typologies—catering to different household types, life stages and income levels—is achieved throughout the precinct.
- Promoting a mix of lot sizes across the precinct will support social cohesion, enhance neighbourhood character, and provide greater housing choice.
- Giving people choice through every stage of the development and giving people a choice of housing types supports the rural theme in the Bannockburn community.

## REQUESTED CHANGE

Remove the dwelling yields within the table and amend to a dwelling density average of 15dw/ha with a requirement to demonstrate diversity in dwelling sizes across the precinct. This achieves the same housing density target as exhibited and a more inclusive community throughout the precinct.



# REQUESTED CHANGE #10: SOCIAL & AFFORDABLE HOUSING TARGETS

## CONTEXT

The social and affordable housing target provision is 6.5%. Table 5 identifies a provision of 5.6% for social housing and 0.9% for affordable housing.

## ISSUE

- The proposed 6.5% contribution has not been justified.
- The PSP does not sufficiently recognise that the three major landowners are not built-form developers and will be delivering land only.
- Table 5 within the PSP is far too prescriptive
- Due to the fact that the PSP will be delivered over an extended timeframe, flexibility in relation to the staging of contributions should be clearly articulated (i.e. some stages won't suit a full contribution).
- In the absence of engaging with registered housing providers to determine whether there is a willingness to invest in the precinct, along with understanding their various requirements, it is premature to provide any level of specification in the PSP.

## REQUESTED CHANGE

- Remove Table 5
- Amend wording of social housing provision to allow broad delivery of social and affordable housing
- Review quantum of social housing

# REQUESTED CHANGE #11: REMOVE HATCHERY BUFFER

## CONTEXT

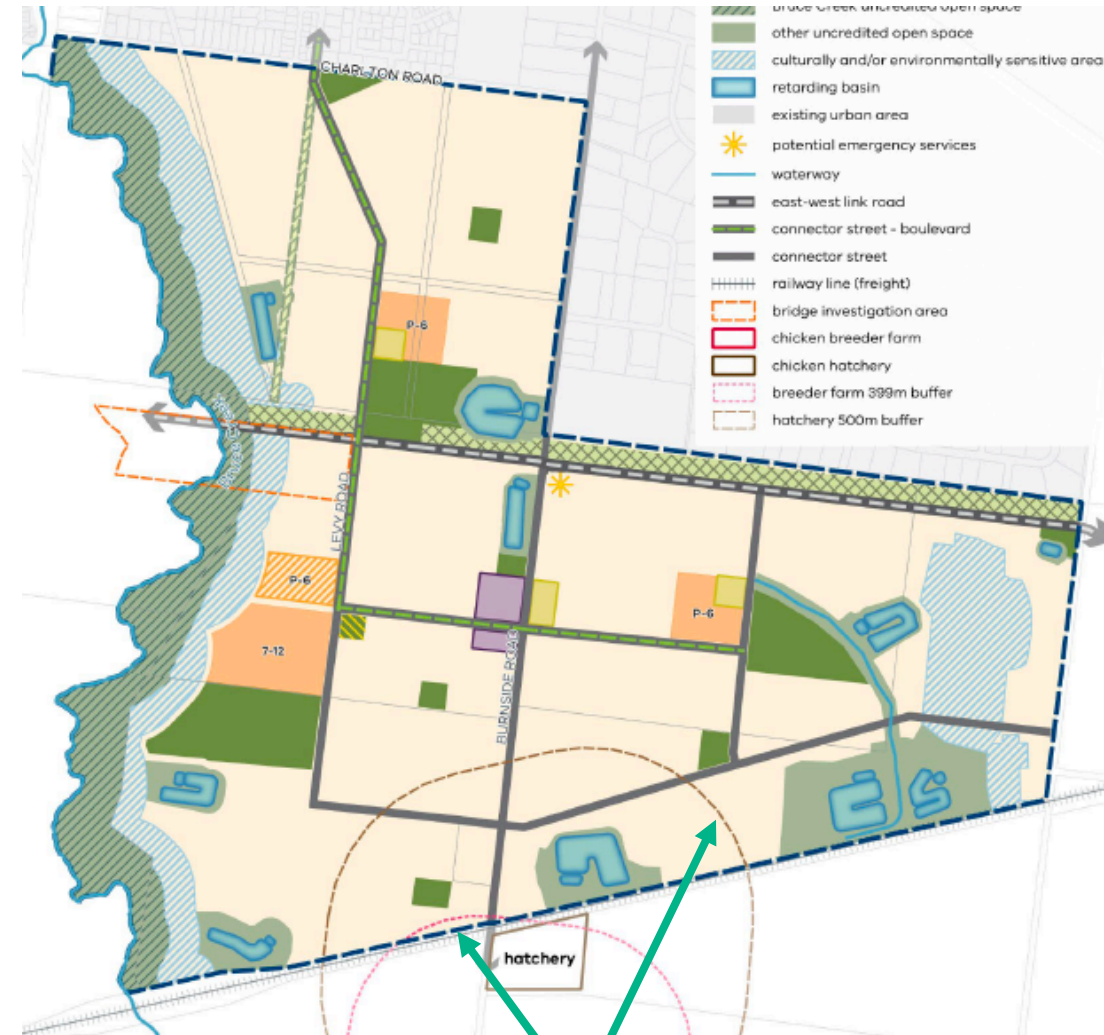
The EPA have recommended a buffer to Turosi Foods hatchery and breeder farm. RPG and Netherby's have undertaken an Odour Assessment to determine whether a buffer is necessary. Following a meeting with PJRA, EPA, VPA, RPG and Netherby's where PJRA presented the findings of the Odour Assessment which has determined that no buffer is required.

## ISSUE

- Including a buffer is unnecessary as the Odour Report does not support any buffer near a hatchery

## REQUESTED CHANGE

- Remove Hatchery and Breeder Buffers from all PSP Plans
- Remove any Requirement and Guidelines associated with the buffer
- Remove any reference to the buffer in the Planning Controls and any associated documentation



# FEASIBILITY OF DEVELOPMENT

## CONTEXT

The DCP of \$970k per hectare is commercially unfeasible and will result in no development for many years. The Urbis report assumes that lot sales will be viable in 5 years, this assumption is based on insufficient evidence.

## ISSUE

The feasibility undertaken by Urbis has a number of flawed assumptions including:

- Lot sale prices are far in excess of the current market value of lots in Bannockburn – \$625 per m<sup>2</sup> where the current rate of \$568 per m<sup>2</sup>. Furthermore the current lots in Bannockburn are closer to established facilities and amenity than in this PSP and will attract a higher price than in this PSP.
- Lot sale price escalation assumptions are in excess of recent historical data.
- An unrealistic high annual volume of lot sales condenses the timing of cash inflows which manufactures an unrealistically high rate of return. The assumption that the entire precinct will be delivered in 10 years is in excess of 400 lots sold and constructed each year without accounting for other development growth fronts such as the North West Bannockburn Precinct, Ormond Road and South West Precinct.
- A development becomes unfeasible when the development contributions imposed are excessive, as these costs significantly erode the financial viability of a project. High contribution rates reduce the developer's return on investment, making it difficult to achieve the minimum internal rate of return (IRR) of 18-20% required by banks to fund development. As a result, development activity is likely to stall or cease entirely, ultimately undermining the delivery of new housing, infrastructure and especially affordable housing.

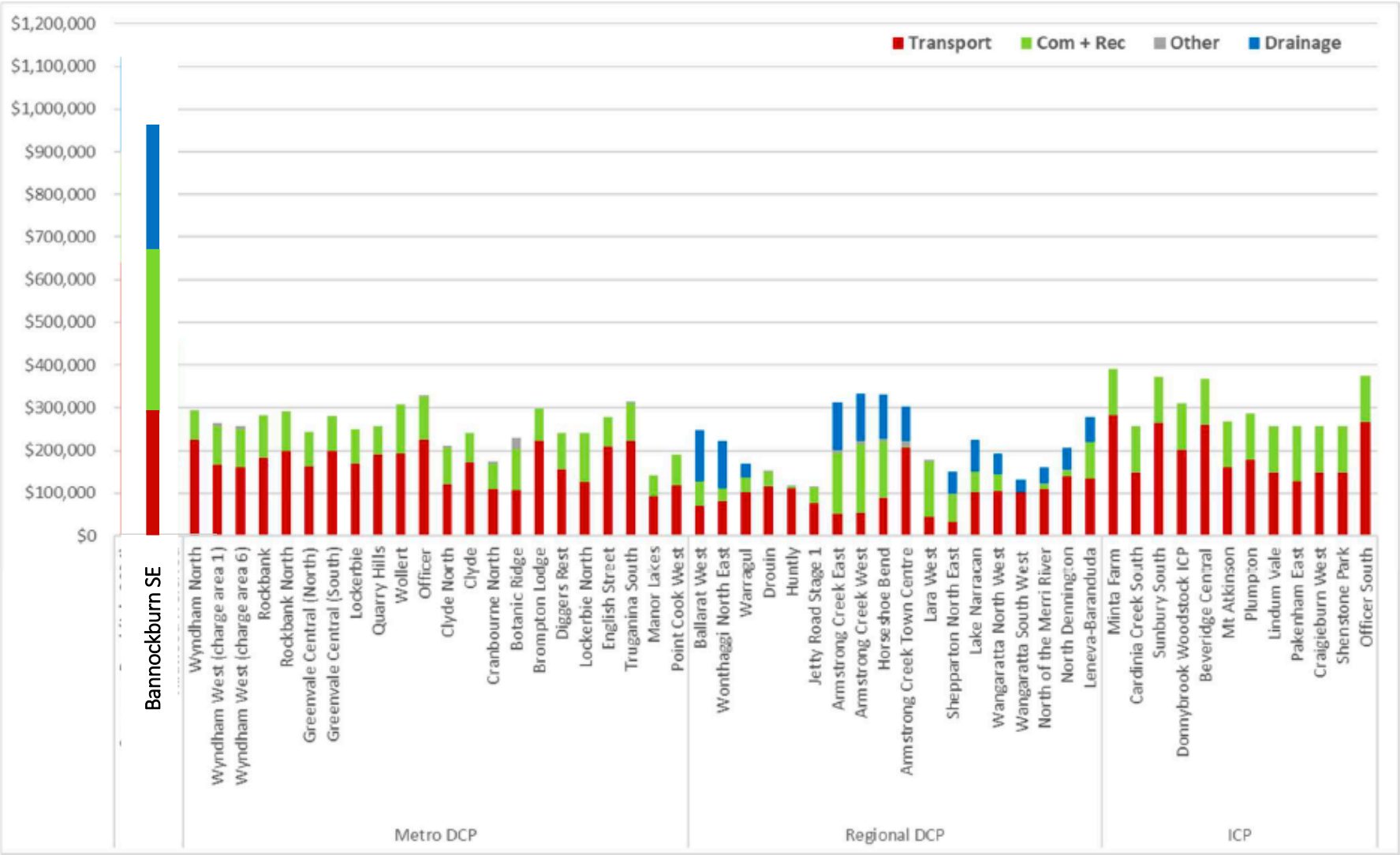
## REQUESTED CHANGE

All of the recommendations in this submission to reduce the DCP and make the Precinct commercially feasible.

# COMPARISON DCP LEVIES

This comparison of DCP Rates across Metro and Regional PSP has been adapted from the Urban Enterprise submission on behalf of Villawood Properties to the Creamery Road PSP Standing Advisory Committee adding Bannockburn DCP Rate.

The comparison shows the Bannockburn DCP rate far exceeds any regional or metro DCP rates which highlights that there is a fundamental issue with the rate.



Source: Urban Enterprise, based on gazetted DCP documents. Construction DIL only. Values indexed by UE to June 2024.



# PART 2 | TABLE OF REQUESTED CHANGES

# RPG PROPOSED WORDING AMENDMENTS

## TABLE OF CHANGES

The collective three key landowner group comprising of Josco, Netherby's and RPG have collaborated to prepared recommended changes to the following documents:

- Urban Growth Zone Schedule 1
- Development Contribution Plan Schedule 1
- Bannockburn South East Precinct Structure Plan
- Bannockburn South East Development Contribution Plan

These changes are intended to enhance the practical delivery of the precinct by introducing greater flexibility in planning and implementation. They also support the ongoing feasibility of the precinct by allowing the documentation to evolve over time in response to changing market conditions, infrastructure delivery, and development staging requirements.

## **Bannockburn South-East Precinct– Draft Amendment C107gpla**

The following table outlines the recommended changes to the exhibited documents associated with Amendment C107gpla, as agreed to by all major landowners: Josco, Ramsey Property Group, and Netherby.

Whilst all matters are agreed, the table identifies the matters of direct relevance to each relevant landowner.

		Agree/Disagree	Recommended Change(s)	Rationale	Relevant To
<b><u>Precinct Structure Plan</u></b>					
<b>Section 1.4</b>	<b>Precinct Features</b>				
	Chicken Hatchery and breeder farm.	Disagree.	Remove everything beyond first sentence.	In light of the conclusions of the PJRA Odour Impact Assessment, there is no constraint on the ability to develop land within the precinct for sensitive land uses.	Netherby & RPG
	Amphitheatre.	Disagree.	Amend to remove reference to holding significant cultural value.	Whilst this could be proven in the future, it will only be known following the preparation of a CHMP.  At a minimum, the words “may hold” should be used, along with an acknowledgement that this will need to be confirmed following the preparation of a CHMP.	Netherby & RPG
<b>Plan 1</b>	<b>Precinct Features</b>				
	Historical homestead and drystone wall.	Disagree.	Amend to remove reference to historical homestead.	The VPA has been previously provided with a heritage report that confirmed that there are no structures of historical significance that are worthy of retention within 430 Burnside Road.  The drystone wall was also not identified as being significant enough so that it cannot be rebuilt.	Netherby
	Artefact Scatter	Disagree	Delete.	Unless it can be demonstrated that the identification of the ‘artefact scatter’ adjacent to the Bruce Creek corridor is based on on-site investigation, this should be deleted from Plan 1. Any artefacts found as part of a CHMP will need to be managed through this process and the relevant legislation.	Josco
	Golden sun moth / tussock skink habitat – Levy Road reserve	Disagree	Amend to ‘potential golden sun moth / tussock skink habitat’	The presence of golden sun moth or tussock skink was not confirmed within the existing Levy Road reserve as part of the targeted surveys undertaken. As such, this land would be more appropriately identified as potential habitat.	Josco
	High value trees	Disagree	Delete the two Monterey Cypress from Josco land (Trees 683 and 684) from identification as ‘high value trees’ on Plan 1	The identification of these two trees as high value in the arboricultural assessment is in direct conflict with the arboricultural assessment and the VPA’s Background Ground, which both state that all Monterey Cypress trees, even those currently in moderate/good health, are not recommended for protection as the area is infected with Cypress Canker which is untreatable and will inevitably lead to the death of all the trees.	Josco
	Moderate retention value trees	Disagree	Delete all ‘moderate retention value trees’ from the plan	As per the arboricultural assessment, the low and moderate retention value trees are predominantly weed species and therefore should not be retained.	Josco, Netherby & RPG
<b>Section 2.2</b>	<b>PSP Purpose</b>				

		Agree/Disagree	Recommended Change(s)	Rationale	Relevant To
	“Place Wadawurrung cultural values at the centre of the precinct by recognising and protecting areas of cultural significance.”	Disagree.	Delete.	In light of the fact that CHMP’s have not been prepared, the cultural values of the precinct are therefore not known in their entirety.	Netherby & RPG
<b>Plan 2</b>	<b>Place Based Plan</b>				
	“Culturally and/or environmentally sensitive area”.	Disagree.	Delete the ‘culturally and/or environmentally sensitive area’ adjacent to the Bruce Creek corridor and replace with “residential”.	<p>Extensive consultation previously occurred between the landholders, the VPA, the CCMA and the Council – including a site visit.</p> <p>Mapping was prepared that set a ‘development line’ based upon a number of different site factors (slope, minimum setback to creek etc.). This ‘development line’ should be adopted as the boundary between the ‘Bruce Creek uncredited open space’ and ‘residential’ areas.</p> <p>Any risk associated with future cultural and/or environmental constraints within this area should be borne by the landholders.</p> <p>The removal of the ‘culturally and/or environmentally sensitive area’ will substantially increase the NDA of the precinct and lower the DCP rate per NDHA.</p> <p>A number of changes to various plans and text throughout the PSP and DCP would be required to respond to the proposed revision.</p>	Josco. Netherby & RPG
	Bruce Creek uncredited open space	Query	Ensure this reflects agreed upon ‘development line’.	As above, extensive consultation previously occurred to determine a ‘development line’, which should be utilised as the boundary for the Bruce Creek uncredited open space. Make sure this boundary is consistent with development line /survey work previously agreed on.	Josco. Netherby & RPG
	Conservation Area	Disagree	Delete or amend conservation area along existing Levy Road reserve.	Deletion of all or part of the conservation area identified along the existing Levy Road reserve, would allow part of this existing road reserve to be utilised/upgraded, rather than seeking a completely new alignment of Levy Road through the Josco land.	Josco
	Government Primary Schools	Disagree (Query)	Delete one government primary school.	We query whether, due to the higher population estimated by the ASR report, there is sufficient for a total of three primary schools in the precinct. Suggest deleting one government primary school.	Josco. Netherby & RPG
	Local Community Facilities	Disagree	Delete one level-1 community facility	We query whether, due to the higher population estimated by the ASR report, there is an over provision of community facilities within the precinct. Based on the demand identified, it appears that the total number of community facilities could be reduced to one level-1 facility and one level-2 facility.	Josco, Netherby
	Sports Reserves	Agree with change	Reduce area of all three Sports Reserves.	The concept designs for all three of the sporting reserves show inefficiencies and surplus open space land that is not required for the facilities proposed. The size of these sports reserves should be reduced as much as possible to reduce overall land costs, as well as making more efficient use of land within the Bruce Creek corridor or transmission easement, where possible.	Josco. Netherby & RPG
	Hatchery and Breeder Buffer	Disagree	Delete buffer	In light of the conclusions of the PJRA Odour Impact Assessment, there is no constraint on the ability to develop land within the precinct for sensitive land uses.	Netherby & RPG

		Agree/Disagree	Recommended Change(s)	Rationale	Relevant To
	Drainage & Basins	Disagree	Update Drainage reserves to reduce land take.	Functional designs appear to be inefficient and non-responsive to topographical conditions.	Josco. Netherby & RPG
<b>Section 3</b>	<b>Implementation</b>				
	Objective 2.	Disagree.	Delete.	On the basis that the “culturally and/or environmentally sensitive area” is requested to be deleted from the PSP, this objective is no longer required.	Josco, Netherby & RPG
	Objective 4.	Disagree.	Delete.	In light of the conclusions of the PJRA Odour Impact Assessment, there is no constraint on the ability to develop land within the precinct for sensitive land uses.	Netherby & RPG
	Requirement 1	Agree (with changes)	Subdivision for residential development must <del>be generally in accordance with</del> “respond to the density targets in” Plan 3 Housing, and Table 3 Housing density and diversity, to the satisfaction of the responsible authority.	The density target of 17dw/ha may not be immediately achievable, however, will likely be achieved over time. Wording should be revised to reflect this.	Josco, Netherby & RPG
	Requirement 3.	Agree (with changes).	Amend to replace “active frontages” with “passive surveillance” or alike.	The use of “active frontages” implies a customer land use. The use of “passive surveillance” will allow a variety of residential outcomes to occur that still achieves the design intent.	Netherby & RPG
	Requirement 4.	Disagree.	Delete.	On the basis that the “culturally and/or environmentally sensitive area” is requested to be deleted from the PSP, this requirement is no longer required. If the designation of this land being deleted is not supported, then R4 should be amended to include more flexible wording (applying the requirements ‘as relevant’ or similar), or be made into a guideline.	Josco, Netherby & RPG
	Requirement 6.	Disagree.	Delete.	In light of the conclusions of the PJRA Odour Impact Assessment, there is no constraint on the ability to develop land within the precinct for sensitive land uses.	Netherby & RPG
	Guideline 2.	Agree (with changes).	If Table 5 is to remain within the PSP, amend guideline to make reference to it as guidance only.	In light of the affordable housing contribution being voluntary, the inclusion of Table 5 is an unusual level of detail. However, if the VPA believes that it must remain, then this guideline provides an opportunity to refer to it and confirm that it provides guidance only.	Josco, Netherby & RPG
	Guideline 5.	Disagree.	Delete.	In light of the conclusions of the PJRA Odour Impact Assessment, there is no constraint on the ability to develop land within the precinct for sensitive land uses.	Netherby & RPG
	Table 3   Amenity Area   Target Density	Agree (with changes)	Average of 17 dwellings or more per net developable hectare (NDHa) “, where appropriate, should be targeted over time”.	More flexible wording should be utilised here to ensure that it is clear that this is to provide guidance only, and should be targeted over time. It may not be immediately achievable to deliver these densities.	Josco, Netherby & RPG
<b>Plan 3</b>	<b>Housing</b>				
	Amenity Areas	Disagree	Delete amenity areas adjacent to Levy Road conservation area (requested to be deleted)	We do not support the identification of the conservation area along the existing Levy Road reserve. As such, we do not consider it appropriate to identify this land as an ‘amenity area’. If the conservation area is retained, having higher densities along this area could also have maintenance and bushfire implications.	Josco

		Agree/Disagree	Recommended Change(s)	Rationale	Relevant To
			Delete amenity area adjacent to the proposed Boulevard Connector (realigned Levy Road) except adjacent to approved bus stops.	While the Boulevard Connector is proposed to be bus-capable, the entirety of this road will not provide sufficient amenity to justify higher residential densities. Extent of 'amenity areas' adjacent to the Boulevard Connector should be reduced to around approved bus stops.	Josco
			Reduce amenity area to a 50m radius from the town centre and delete amenity area surrounding drainage basins	We support a reduced amenity area with a 50m radius from the proposed town centre and support amenity area surrounding sport reserve only. Drainage reserves should not be treated as 'amenity areas'.	
			Delete amenity area along the Arterial Road.	Higher amenity is not appropriate to provide along an arterial road which is serving through traffic function.	
	Open Space	Agree (with changes)	Remove open space label from the transmission easement and rename to 'utilities easement' consistent with Plan 2	We don't support the labelling of the transmission easement as open space. This easement should be able to be utilised for other purposes, as appropriate.	Josco & RPG
	Buffers	Disagree	Remove Hatchery and Breeder Farm buffer	In light of the conclusions of the PJRA Odour Impact Assessment, there is no constraint on the ability to develop land within the precinct for sensitive land uses.	Netherby & RPG
<b>Section 3.2</b>	<b>Safe, accessible and well-connected</b>				
	Requirement 7.	Agree (with changes).	Amend to specify who the 'relevant authority' is.	To avoid any ambiguity over the responsibility of the arterial, this requirement should be amended to identify who the 'relevant authority' is (potentially in both an interim and ultimate scenario).	Josco, Netherby & RPG
	Guidelines 6.	Agree (with changes).	Reduce percentage of canopy coverage from 30% to 25%.	The achievement of 30% canopy coverage in streetscapes is incredibly hard to achieve when all competing constraints are factored in. As such, this should be reduced to reflect a 25% canopy coverage target.	Josco, Netherby & RPG
<b>Plan 4</b>	<b>Movement Network</b>				
	East-West Link (RD-01)	Agree (with changes)	Delete section of East-West link to the west of Levy Road and to the east of the current signalised T-intersection (IN-03) from contributing to the DCP.	The extent of this road to the west of Levy Road and to the east of this t-intersection will not be utilised in any short or medium term as there is no connection beyond the precinct. This is therefore likely to fall outside a reasonable time horizon for the PSP and DCP and should be deleted.	Josco, Netherby & RPG
	Signalised T-Intersection (IN-03)	Disagree	Intersection should be downgraded to a roundabout	The road to the east of this intersection will not be utilised in any short or medium term as there is no connection to the east.	Josco, Netherby & RPG
	Signalised Intersection (IN-01 - Levy Road and East-West link)	Disagree	Intersection should be revised to a signalised T-intersection	The road to the west of this intersection will not be utilised in any short or medium term as there is no connection to the east.	Josco, Netherby & RPG
<b>Section 3.3</b>	<b>Connect people to jobs, higher order services and thriving local economies</b>				
	Requirement 15.	Agree (with changes).	Amend the requirement as follows: Prior to subdivision "which will create 3 or more lots"...	These revisions will allow 2-lot subdivision to occur (ie. Creation of a superlot for the town centre). This will ensure that development can occur around the activity centre prior to the activity centre being delivered.	Josco, Netherby & RPG

		Agree/Disagree	Recommended Change(s)	Rationale	Relevant To
	Requirement 17.	Agree (with changes)	Amend to a Guideline	The use of 'should' in this requirement is not appropriate, it would be more appropriately converted to a guideline.	Netherby & RPG
<b>Section 3.4</b>	<b>High quality public realm</b>				
	Requirement 18.	Disagree	Amend to remove reference to Plan 1	Plan 6 already shows areas of confirmed golden sun moth / tussock skink habitat and high/critical trees, including the Melbourne Yellow Gums, therefore this does not need to include a reference to Plan 1.	Josco
	Requirement 20.	Agree (with changes).	The Bruce Creek corridor should more clearly defined.  Convert this requirement to a guideline and amend the word 'must' to 'should'	On the basis that the "culturally and/or environmentally sensitive area" is deleted from the PSP as requested, then the extent of the Bruce Creek corridor (as referenced in this requirement) will be clearly defined.  Further, this requirement would be more appropriately included as a guideline, as there could be potential conflicts with the bushfire requirements.	Josco, Netherby & RPG
	Requirement 21.	Agree (with changes).	Replace reference to "Habitat Design Plan" with "Conservation Management Plan".	The UGZ1 requires the preparation of a Growling Grass Frog Conservation Management Plan, but not a "Habitat Design Plan". As such, this requirement should be amended to reflect the correct document reference. Making this change will avoid any ambiguity on what is required.	Josco, Netherby & RPG
	Requirement 22.	Agree (with changes).	Delete "may not be limited to".	As this is a requirement, it should be clear that nothing further is required.	Josco, Netherby & RPG
	Requirement 23.	Disagree.	Convert this requirement to a guideline.	Preventing light spill and glare within the Bruce Creek corridor is not realistically entirely achievable. More appropriately included as a guideline.	Josco, Netherby & RPG
	Requirement 25.	Agree (with changes).	Add wording "unless otherwise agreed with the Responsible Authority"	The eastern buffer should be able to be removed when /if the Future Investigation East Area is rezoned and development.	& RPG
	Requirement 26 & 27.	Agree (query)	NA	These requirements directly contradict Guideline 6 which seek roads to have 30% canopy coverage. Perimeter Roads located in bushfire designated areas will not be able to meet the 30% canopy cover and the requirements of 27.	Josco, Netherby & RPG
	Requirement 29.	Disagree.	Amend to delete reference to areas being dedicated to biodiversity or native vegetation conservation being excluded.	It is not clear why these areas should not count towards canopy coverage targets in the public realm. This requirement may be more appropriately included as a guideline.	Josco, Netherby & RPG
	Requirement 32.	Agree (with changes).	Amend as follows: 'The integrated water management plan (IWMP) should be prepared with consideration to the following: [insert above list of incorporated docs].'	This requirement is too broad. No issue with the preparation of an IWMP to the satisfaction of BW, CCMA & the RA being a requirement. Doesn't need to explicitly state the guidelines that it needs to refer to or respond to, as not all of them are relevant. This requirement may be more appropriately included as a guideline.	Josco, Netherby & RPG
	Requirement 34.	Agree (with changes).	Remove reference to being in accordance with Plan 7.	Even if the "culturally and/or environmentally sensitive area" is to remain, other revisions to the overall drainage strategy may result in assets being delivered in alternative locations to those shown in Plan 7.	Josco, Netherby & RPG
			Remove final dot point of this requirement. Include "unless otherwise approved by the Responsible Authority"	The final dot point is a duplicate for Requirement R35. Also, include more flexible wording as things maybe need to be amended from time to time.	Josco, Netherby

		Agree/Disagree	Recommended Change(s)	Rationale	Relevant To
	Requirement 36 & 37	Disagree	Convert these requirements to guidelines	Drainage assets should be located within the culturally and/or environmentally sensitive area (if retained adjacent to the Bruce Creek corridor), if it is appropriate to do so, to maximise NDA within the precinct.  Add 'if applicable' to the first dot point and 'where applicable' to all the other dot points.	Josco, Netherby & RPG
	Requirement 38.	Agree (with changes).	Add 'unless otherwise agreed with the responsible authority' after the word Staging.	Some temporary downstream drainage may be required to be constructed earlier to accommodate stage 1 development.	Josco & RPG
	Requirement 41.	Disagree	Delete	The PSP should not restrict potential alternative uses in the transmission easement in the future. Alternatively, amend to add the words 'unless otherwise agreed by the Responsible Authority' to allow for flexibility in the future. It would still then be at Councils discretion.	& RPG
	Requirement 42.	Agree (queried though).	NA	The word "should" is not reasonable to use within a requirement. These parts of the requirement should be deleted and either introduced as a separate guideline, or combined with one of the existing guidelines (like G30).	Josco, Netherby & RPG
	Guideline 13.	Agree (with changes).	Remove the word 'must' and replace with 'should aim to achieve'	The 30% tree canopy coverage is difficult to achieve and greater flexibility should be included.	Josco, Netherby & RPG
	Guidelines 15.	Agree (queried though).	NA	We query how, at subdivision stage, it can be demonstrated that there is "provision of a static water supply of 2,500 litres for personal firefighting where practical".	Josco, Netherby & RPG
	Guidelines 17.	Agree (queried though).	NA	It should be made clear that front setbacks within private allotments should be permitted to be used for bushfire setbacks.  For example, if a 19.5m setback is required from the Bruce Creek corridor, this setback should be able to consist of both a perimeter road <b>and</b> the front setback of lots (which would be appropriately managed).	Josco, Netherby & RPG
	Guideline 24.	Disagree	Delete	As per the arboricultural assessment, the low and moderate retention value trees are predominantly weed species, and therefore should not be encouraged to be retained.	Josco, Netherby & RPG
	Guidelines 25.	Agree (queried though).	NA	The wording of this guideline (ie "should state") is unclear and should be revised.	Josco, Netherby & RPG
	Guideline 28.	Agree (with changes).	Revise guideline to include the words 'where assets are adjacent to Bruce Creek'	It is not necessary to design all of the other drainage basins in collaboration with the Wadawurrung and ultimately, we need to design basins that will be approved by engineering.	Josco, Netherby & RPG
	Guideline 30.	Agree (queried though).	NA	We query what this guideline means and how will it be expected to be practically achieved?  If no explanation can be offered, then we suggest deleting this guideline.	Josco, Netherby & RPG
	Guideline 32.	Disagree.	Delete.	Place naming occurs outside of the planning process, and therefore there is no relevance to the PSP and this guideline should be deleted.	Josco, Netherby & RPG

		Agree/Disagree	Recommended Change(s)	Rationale	Relevant To
	Guideline 34.	Agree (queried though).	NA	We query whether this guideline should reference 'development', 'subdivision' or both.	Josco, Netherby & RPG
<b>Plan 6</b>	<b>Public Realm</b>				
	High retention value trees	Disagree	Delete the two Monterey Cypress from Josco land (Trees 683 and 684) from identification as 'high value trees' on Plan 6	The identification of these two trees as high value in the arboricultural assessment is in direct conflict with the arboricultural assessment and the VPA's Background Ground, which both state that all Monterey Cypress trees, even those currently in moderate/good health, are not recommended for protection as the area is infected with Cypress Canker which is untreatable and will inevitably lead to the death of all the trees.	Josco
	Sports Reserves	Agree with changes	Reduce the size of all three proposed sports reserves (SR-01, SR-02 & SR-03)	The concept designs for all three of the sporting reserves show inefficiencies and surplus open space land that is not required for the facilities proposed. The size of these sports reserves should be reduced as much as possible to reduce overall land costs, as well as making more efficient use of land within the Bruce Creek corridor or transmission easement, where possible.	Josco, Netherby & RPG
	SR-03	Disagree	Relocate SR-03	SR-03 should be relocated adjacent the Bruce Creek corridor (into the 'culturally & environmentally sensitive area', unless this land use designation is deleted as requested)	Josco, Netherby & RPG
<b>Plan 7</b>	<b>Water</b>				
	Sewer Pump Stations	Disagree.	Amend plan to identify SPS's in accordance with Barwon Water's current position.	The locations of SPS's are inconsistent with Barwon Water's latest advice to landowners.	Josco, Netherby & RPG
	Open Space Legend	Disagree.	Remove wording 'modified kerbing, stormwater harvesting, recycled water' and replace with 'open space'	It has been incorporated into the Guidelines and isn't necessary to include there as it is confusing.	RPG
<b>Plan 8</b>	<b>Bushfire</b>				
	Identifies a 19m setback from "grassland" (i.e. Bruce Creek Corridor).	Agree (queried though).	NA	Unless private land can be used within the bushfire setback, this will result in a 19m local road abutting the Bruce Creek corridor.  This outcome will worsen the ability for activation and passive surveillance over the public open space corridor.	Josco, Netherby & RPG
				The 'culturally & environmentally sensitive area' adjacent the Bruce Creek is also identified on Plan 8 as 'grassland vegetation'. This should be amended, even if the designation of this area is retained.	Josco, Netherby & RPG
<b>Plan 9</b>	<b>Community Infrastructure</b>				
	Local Community Facilities	Disagree	Delete one level-1 community facility	Based on the ASR report, there appears to be an over provision of community facilities within the precinct. Based on the demand identified, it appears that the total number of community facilities should be reduced to one level-1 facility and one level-2 facility.	Josco, Netherby & RPG
<b>Section 3.6</b>	<b>Infrastructure Coordination</b>				

		Agree/Disagree	Recommended Change(s)	Rationale	Relevant To
	Requirement 47.	Disagree.	Delete.	These matters are dealt with post-permit, therefore the requirement should be deleted.	Josco, Netherby & RPG
	Requirement 48.	Agree (with changes).	Revise the requirement to add the words 'where practical'	This is difficult to implement in some circumstances. Stating that services need to be bundled isn't overly correct either, as some services cannot be placed in common trenches (ie. electricity & water).	Josco, Netherby & RPG
	Requirement 50.	Agree (with changes)	Convert this requirement to a guideline and add the words 'where practical'	It may not be practical for every single house to have rooftop solar and battery storage. There should be flexibility incorporated into the wording, and this is more appropriately included as a guideline.	Josco, Netherby & RPG
	Guideline 47.	Agree (with changes).	Revise the guideline to add the words 'where practical'	This may be difficult to achieve in all circumstances, and as such flexibility should be incorporated into the guideline for the delivery of the ESD opportunities.	Josco, Netherby & RPG
<b>Plan 10</b>	<b>Infrastructure and Development Staging</b>				
	Staging reflects superseded position of Barwon Water.	Agree (with changes).	Amend plan reflect Barwon Water's current position.	Staging reflects superseded position of Barwon Water.	Netherby
<b>Plan 11 / Table 19</b>	<b>Precinct Infrastructure</b>				
	IN-01	Agree (with changes).	Downgrade from a signalised intersection to either an unsignalized intersection (roundabout) or signalised T-intersection.	Given that there is no development front anticipated to the west within the time horizon of the PSP and DCP, the western-leg of this intersection is not required.	Josco, Netherby & RPG
	IN-03	Agree (with changes).	Downgrade from signalised T Intersection to unsignalized intersection.	Given that there is no development front east of this intersection within the time horizon of the PSP and DCP, there is no requirement for this to be a signalised intersection.	Netherby & RPG
	BR-01	Disagree	Delete	No evidence has been provided that confirms that BR-01 will be delivered within the time horizon of the DCP (20-25 years), therefore this project should be deleted from the PSP/DCP and if required in the future (following development of the adjacent growth area west of Bruce Creek), funded via alternative mechanisms.	Josco, Netherby & RPG
	Local Community Facilities	Disagree	Delete one level-1 community facility	Based on the ASR report, there appears to be an over provision of community facilities within the precinct. Based on the demand identified, it appears that the total number of community facilities should be reduced, to one level-1 facility and one level-2 facility.	Josco, Netherby & RPG
	Retarding Basins	Disagree	Update basin design as per final drainage concept.	The location, number and size of drainage basins should be amended to reflect the final drainage concept prepared by Creo, based on the alternative SWMS layout prepared by Neil Craigie (14 May 2025). <sup>1</sup>	Josco, Netherby & RPG
<b>Appendix 6</b>	<b>Transmission Easement design outcomes</b>				
	Open Space and development outcomes for transmission easement should:	Agree (with changes).	Include wording "residential or commercial development will be considered at the	This will allow flexibility in the future, the restrictions are too prescriptive given the long term nature of the Precinct and future innovation and / or design outcomes that	RPG

<sup>1</sup> Josco agrees subject to the removal of the waterway shown in the design between Charleton Road and the transmission easement, as agreed to by the VPA.

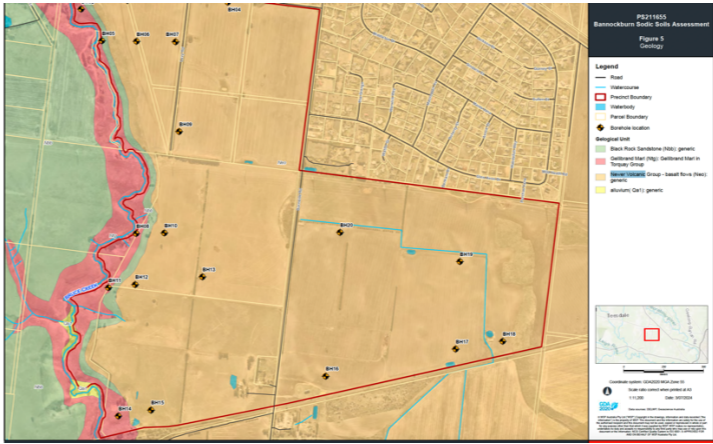
		Agree/Disagree	Recommended Change(s)	Rationale	Relevant To
			absolute discretion of the Responsible Authority	might be suitable to allow commercial or residential development or other alternative uses.	
	Table 23	Agree (with changes).	Include wording "Alternative allowances are at the discretion of the Responsible Authority and the following restrictions apply unless otherwise agreed by the Responsible Authority and Ausnet".	This will allow flexibility in the future, the restrictions are too prescriptive given the long term nature of the Precinct and future innovation and / or design outcomes that might be suitable to allow commercial or residential development or other alternative uses.	RPG
<b>Development Contributions Plan</b>					
<b>Chapter 2</b>	<b>Timeframe</b>				
	The DCP does not include a time horizon.	NA	A new subsection to Chapter 2 should be included that specifies a timeframe for the DCP.	The DCP Guidelines state:  <i>A DCP must include a time horizon. This time horizon should not exceed 20 to 25 years. If the time horizon is not reasonable, new development in the early years will be paying for infrastructure that will not be delivered until many years later. This is inequitable and unreasonable.</i>	Josco, Netherby & RPG
<b>Plan 3 / Section 3.3</b>	<b>Transport Items</b>				
	BR-01 – Bruce Creek Bridge.	Disagree.	Delete from the DCP.	No evidence has been provided that confirm that BR-01 will be delivered within the timeframe of the DCP (a maximum period of 25 years).	Josco, Netherby & RPG
	BR-01 – Bruce Creek Bridge.	Disagree.	Reduce 50% apportionment.	Should evidence be provided that confirms that BR-01 will in fact be delivered within the timeframe of the DCP, there is no evidence that supports the 50% apportionment.  If the arterial is to provide a genuine bypass function, then it will benefit the broader township.  Very few trips from the precinct will head west. Rather, the majority of trips will head north or east.	Josco, Netherby & RPG
	BR-01 – Bruce Creek Bridge.	Disagree.	Reduce the overall cost of BR-01 by adopted a simpler design.	Should evidence be provided that confirms that BR-01 will in fact be delivered within the timeframe of the DCP, the approximate \$80m cost of the project should be reduced.  Work undertaken by Jacobs demonstrates that a simpler and significantly more cost-effective design could replace the current proposal.  Any urban design benefits of the current proposal must be weighed against the exuberantly high cost of the single DCP item/project.	Josco, Netherby & RPG
	RD-01 – Arterial Road.	Disagree.	The western and eastern-most portions of RD-01 should be removed from the DCP as they will not be required within the timeframe of the DCP.	As BR-01 and the continuation of the arterial to the east of the precinct will not occur within the timeframe of the DCP, there will be no need to deliver the western and eastern-most portions of RD-01, being west of IN-01 and east of IN-03.	Josco, Netherby & RPG

		Agree/Disagree	Recommended Change(s)	Rationale	Relevant To
	IN-01 – Levy Road / Future EW Link Road Intersection	Disagree	Amend to 3-way non signalised intersection - Delete western leg	As BR-01 is proposed to be deleted, the western leg of this intersection should also be deleted.	Josco, Netherby & RPG
	IN-03 – Three-way Intersection.	Disagree.	If not deleted entirely (converted to non-signalised intersection), amend the project costs of IN-03 to reflect the fact that it is a three-way intersection. Should be downgraded to a two-way intersection.	Primary position to delete project costs associated with IN-03 and convert this to a non-signalised intersection.  If retained, the project costs of IN-03 should be reviewed and reduced as despite IN-01 and IN-02 being four-way intersection and IN-03 being a three-way intersection, they have the same cost in the DCP.	Josco, Netherby & RPG
	RD-02 – Railway Crossing.	Agree (seeking information).	NA	We request additional information in relation to the examples referred to within Section 9.1.2 of the DCP to justify a \$2M construction cost.  Further, it must be made clear that despite any future assessment of this crossing, as required by the UGZ1, and recommendations for upgrade works, no additional cost will be included in the DCP on top of the \$2M specified.	Josco, Netherby & RPG
<b>Plan 4 / Section 3.4</b>	<b>Community &amp; Recreation Items</b>				
	Local Community Facilities.	Disagree (query).	Delete one level-1 community facility.	Based on the ASR report, there appears to be an over provision of community facilities within the precinct. Based on the demand identified, it appears that the total number of community facilities should be reduced to one level-1 facility and one level-2 facility.  We also understand that the Council is concerned about the potential ongoing cost implications of the DCP. In light of this, we query whether the Council does in fact wish to own and operate three separate community facilities within the precinct.	Josco, Netherby
	Active Open Space Reserves (all)	Disagree (query).	Delete one active open space reserve.	We understand that the Council is concerned about the potential ongoing cost implications of the DCP. In light of this, we query whether the Council does in fact wish to own and operate three separate active open space reserves.	Josco, Netherby
	SR-01	Disagree (query).	Amend concept design	We consider that there may be opportunities to review the concept design layout to maximise the area within the transmission easement and reduce the overall size of this reserve, which would result in both reduced land cost and increased NDA.	Josco, Netherby & RPG
	SR-02	Disagree (query).	Increase external apportionment of this reserve.  Amend concept design	SR-02 is planned to accommodate an athletics track.  It is highly likely that the athletics track will be used by residents of the existing township beyond the bounds of the precinct.  As such, an apportionment of cost for SR-02 should be excluded from the DCP.  Further, the design concept results in an efficient use of space. It is considered that the area of this reserve could be reduced substantially, which would result in both reduced land costs and increased NDA.	Josco, Netherby & RPG
	SR-03	Disagree (query).	Amend location and concept design	SR-03 concept design provides for inefficient use of space and is larger than what is required for the facilities proposed. SR-03 should be relocated further west adjacent to the Bruce Creek Corridor, into the 'culturally & environmentally sensitive area' (if	Josco, Netherby & RPG

		Agree/Disagree	Recommended Change(s)	Rationale	Relevant To
				designation not deleted). This would result in both reduced land costs and increased NDA	
<b>Plan 5 / Section 3.5</b>	<b>Drainage Items</b>				
	Drainage Infrastructure	Disagree	Update basin design as per final drainage concept.	The location, number and size of drainage basins should be amended to reflect the final drainage concept prepared by Creo, based on the alternative SWMS layout prepared by Neil Craigie (14 May 2025). <sup>2</sup>	Josco, Netherby & RPG
<b>General</b>	<b>Conservative Costings</b>				
	P90 – Costings.	Disagree.	Revise scope and costs of all construction projects in accordance with the VPA Benchmark Cost Estimates	Utilising the P90 Benchmark Costs Estimates could result in significant reduction to overall project construction costs and DIL (as well as reduce the shortfall from the CIL). Use of P50 estimates would result in further reductions.	Josco, Netherby & RPG
			Remove contingencies on top of what are already meant to be conservative P90 costing.	In a number of circumstances, the DCP has utilised P90 costings ahead of less conservative options. However, on top of this, the DCP has in a number of circumstances also allowed for contingencies on top of the P90 costings.  This approach results in a ‘double-dip’.  If contingencies are to remain, then P90 costings should not be used.	Josco, Netherby & RPG
<b>Planning Controls</b>					
<b>UGZ1 – 1.0</b>	<b>Plan 1</b>				
	<b>Update Plan 1</b>	Disagree.	Update Plan 1 in accordance with the requested changes to Plan 2 Place Based Plan of the PSP, as outlined above.	Update Plan 1 in the UGZ1 to reflect changes requested to Plan 2 Place Based Plan of the PSP.	Josco, Netherby & RPG
<b>UGZ1 – 2.2</b>	<b>Applied Zone</b>				
	<b>Table 1</b> – identifies ‘all other land’ as General Residential Zone.	Agree (seeking confirmation).	NA	We seek confirmation that the ‘culturally and/or environmentally sensitive area’ as shown in Plan 1 is classified as ‘all other land’.	Josco, Netherby & RPG
<b>UGZ1 – 2.3</b>	<b>Specific Provisions – Use of Land</b>				
	<b>Table 2</b> – identifies ‘accommodation’ and ‘informal outdoor recreation’ as a Section 2 land use if located within the 500m hatchery buffer or the 399m breeder farm buffer as shown in Plan 1.	Disagree.	Delete.	In light of the conclusions of the PJRA Odour Impact Assessment, there is no constraint on the ability to develop land within the precinct for sensitive land uses.	Netherby & RPG

<sup>2</sup> Josco agrees subject to the removal of the waterway shown in the design between Charleton Road and the transmission easement, as agreed to by the VPA.

		Agree/Disagree	Recommended Change(s)	Rationale	Relevant To
	<b>Chicken Hatchery &amp; Breeder Farm</b> – requires the provision of a level 3 odour impact assessment.	Disagree.	Delete.	In light of the conclusions of the PJRA Odour Impact Assessment, there is no constraint on the ability to develop land within the precinct for sensitive land uses.	Netherby & RPG
<b>UGZ1 – 2.4</b>	<b>Specific Provisions – Subdivision</b>				
	<b>Chicken Hatchery &amp; Breeder Farm</b> – requires the provision of a level 3 odour impact assessment.	Disagree.	Delete.	In light of the conclusions of the PJRA Odour Impact Assessment, there is no constraint on the ability to develop land within the precinct for sensitive land uses.	Netherby & RPG
	<b>Bruce Creek Conservation Area Growling Grass Frog CMP</b> – requires the CMP for the entire length of Bruce Creek prior to the subdivision of land within the ‘uncredited open space’ or the ‘culturally and/or environmentally sensitive area’.	Agree (with changes).	Amend to allow CMP to be prepared in stages.	The differing landownership arrangements abutting Bruce Creek make it implausible for the CMP to be completed in one stage. The requirement for CMP should be for land in one ownership, not the whole precinct. Requirement for CMP to apply to entire precinct is inconsistent with what would otherwise be required by Part 7 of the EPBC Act referral process, which allows the CMP to be prepared in stages.	Josco, Netherby & RPG
			Delete reference to ‘culturally and/or environmentally sensitive area’; OR  Amend wording to say “A permit must not be granted to subdivide land within the “Bruce Creek uncredited open space’ or ‘culturally and/or environmentally sensitive area where the area is adjacent to Bruce Creek’	As per request to delete the culturally and/or environmentally sensitive area from adjacent the Bruce Creek corridor, this wording should be revised to reflect this.	Josco, Netherby & RPG
<b>UGZ1 – 3.0</b>	<b>Application Requirements</b>				
	<b>Residential Subdivision – Subdivision and Housing Design Guidelines</b>	Disagree	Delete from general <i>residential subdivision</i> application requirements	Can form permit conditions, should not have to be provided as part of a permit application	Josco, Netherby & RPG
	<b>Residential Subdivision - A lot size diversity plan including a colour-coded lot size plan</b>	Agree with changes	Amend wording as follows: A lot size diversity plan including a colour-coded lot size plan, reflecting “aiming to achieve” the lot size categories outlined in Table “3” - Housing Density and Diversity in the incorporated PSP, “where appropriate”	Compliance with the 3 different lot types as per Table 3 is not achievable in all instances. As such, this requirement should be amended to provide more flexible wording, which aims for compliance instead of requiring it.	Josco, Netherby & RPG
	<b>Residential Subdivision – Risk assessment of the Burnside Road railway crossing</b>	Disagree	Delete from general <i>residential subdivision</i> application requirements	VPA should undertake further analysis prior to finalisation of the Amendment to determine what upgrade works, if any, are required to the existing Burnside Road rail crossing and at what point in time these are required (ie. Lot cap?), rather than this being required by individual landowners.  It should be made clear that regardless of the outcome or recommendations of the assessment, that no further costs are to be funded via the DCP on top of the \$2M already specified.	Josco, Netherby & RPG

		Agree/Disagree	Recommended Change(s)	Rationale	Relevant To
	<b>Residential Subdivision – Arboricultural Report &amp; Tree Retention Plan</b>	Agree, with changes	Add to both dot points, “where the proposed subdivision incorporates trees that have been identified as ‘critical/high retention value tree’ on Plan 6 – Public Realm.”	These requirements should not be required elsewhere in the precinct, as it is considered irrelevant and overly burdensome for landowners.	Josco, Netherby & RPG
	<b>Residential Subdivision – Proposed bus routes and bus stop locations</b>	Disagree	Delete from general <i>residential subdivision</i> application requirements	Unreasonable for this consultation with Transport for Victoria to occur prior to lodgement of a permit application. This could be incorporated into permit conditions if required.	Josco, Netherby & RPG
	<b>Residential Subdivision - Hydrogeological Report</b>	Disagree (query)		We query whether this is required to be provided with an application or whether it can be conditioned as part of a permit, if necessary.	RPG
	<b>Bushfire Management Plan</b>	Agree with changes and move to a condition	Amend to add the words: “where the ‘future investigation area east’ has been rezoned, this requirement does not apply to the satisfaction of the Responsible Authority”	We query whether this is practical for the drainage basins.  It is already referred to in section 4, this should be a condition of the permit.	RPG
	<b>Public Infrastructure Plan</b>	Agree with changes	Move to Section 4	This should be moved to permit condition rather than requiring this to be provided with an application. This will likely require Council input and discussion in its preparation.	Josco, Netherby & RPG
	<b>Sodic and dispersive soils management plan</b>	Disagree	Amend, after the words an application to subdivide, add “within the sensitive area adjacent to Bruces Creek”	<p>This is only relevant to high risk areas adjacent the Bruce Creek corridor. The below comments are from the WSP Report, this shouldn’t be a requirement across the whole site. The report only recommends the management plan in the high risk and the sandstone area, see attached.</p> <p>“It is further recommended that intrusive (physical) soil investigations be required where constructions are deemed medium to high risk (e.g. along the escarpment, steep slopes, or where infrastructure is likely to be placed within the Sandringham Sandstone) to confirm soil conditions and erosion risk and allow for site specific recommendations to be made</p> <p>While there is variability in the level of sodicity in the surface soils, at a precinct scale, the erosion risk is considered to be predominantly driven by the slope, being consistently low to medium risk across the flatter area of the precinct, but high risk along the escarpment to Bruce Creek.”</p> 	Josco, Netherby & RPG

		Agree/Disagree	Recommended Change(s)	Rationale	Relevant To
	<b>Chicken Hatchery &amp; Breeder Farm</b> – requires the provision of a level 3 odour impact assessment.	Disagree.	Delete.	In light of the conclusions of the PJRA Odour Impact Assessment, there is no constraint on the ability to develop land within the precinct for sensitive land uses.	Netherby & RPG
	<b>Victorian Grassland Earless Dragon</b> - requires an 'impact assessment' for the VGED	Disagree	Amend reference to an 'impact assessment' to 'habitat assessment'.	We seek clarification as to the impact assessment requirement, given this deviates from the wording utilised by the VPA in the specified process of dealing with VGED outside MSA areas (as outlined in their statement, dated Nov 2024).  Alternatively, a VGED Habitat Assessment could narrow down on the areas that may require further assessment (targeted surveys). This approach was taken by Council in the recently exhibited Marshall PSP.	Josco & RPG
<b>UGZ1 – 4.0</b>	<b>Conditions and requirements for permits</b>				
	<b>Conditions and requirements for permits</b>	Agree with changes	Clarify that the conditions and requirements under Section 4 are only for permits creating 3 or more lots.	The conditions and requirements in section 4 should only apply to subdivision applications for 3 or more lots. These will largely be irrelevant for 2 lot subdivisions, like in the example of creating a lot for Barwon Water's pump station etc.	Josco, Netherby & RPG
	<b>Conditions - Road network</b>	Agree with changes	Amend to add the words: "Where appropriate, to the satisfaction of the responsible authority"	This condition won't necessarily be required in every permit.	Josco, Netherby & RPG
	<b>Requirement – Victorian Grassland Earless Dragon impact assessment</b> – requires compliance with impact assessment.	Disagree.	Amend reference of an 'impact assessment' to 'habitat assessment'.	Amend wording of this requirement accordingly based on changes to above application requirement.	Josco & RPG
	<b>Requirement – Odour Environmental Assessment</b>	Disagree.	Delete subject to PRSA being completed	This is not required if the EPA approve a PRSA report.	Netherby & RPG
	<b>Requirement – Burnside Road Railway Crossing</b> – requires recommendations of a risk assessment report to be implemented	Disagree (Query)	Delete	Based on above changes to the application requirement for the risk assessment, we query whether this requirement could be deleted	Josco, Netherby & RPG
	<b>Requirement – Sodic and dispersive soil site management</b>	Agree with changes.	As above, "where appropriate."	As above, wording should be amended to reflect only the high risk areas adjacent the Bruce Creek corridor.	Josco, Netherby & RPG
<b>UGZ1 – 6.0</b>	<b>Decision Guidelines</b>				
	<b>Hatchery Buffer</b> – consideration of odour emissions.	Disagree.	Delete.	In light of the conclusions of the PJRA Odour Impact Assessment, there is no constraint on the ability to develop land within the precinct for sensitive land uses.	Netherby & RPG
<b>DCPO1 – 3.0</b>	<b>Land or development excluded from development contribution plan</b>				
	<b>Add dot point</b>	NA	Social and Affordable Housing	Land provided for or on behalf of Housing provider for social housing shouldn't attract DCP contributions. Ministerial Direction exempts "housing provided by or on behalf of the Chief Executive Officer of Homes Victoria"	Josco, Netherby & RPG
<b>Technical Reports</b>					

		Agree/Disagree	Recommended Change(s)	Rationale	Relevant To
Valuation Report, Charter Keck Cramer	Land Valuation				
	Table 10.6 – Valuation (Scenario 2) – Site Specific Assessment.	Disagree (Query)		It is unclear why a different per hectare land valuation has been specified for proposed local sports reserves across the precinct. Further clarification is sought.	Josco, Netherby & RPG



# PART 3 | SUMMARY

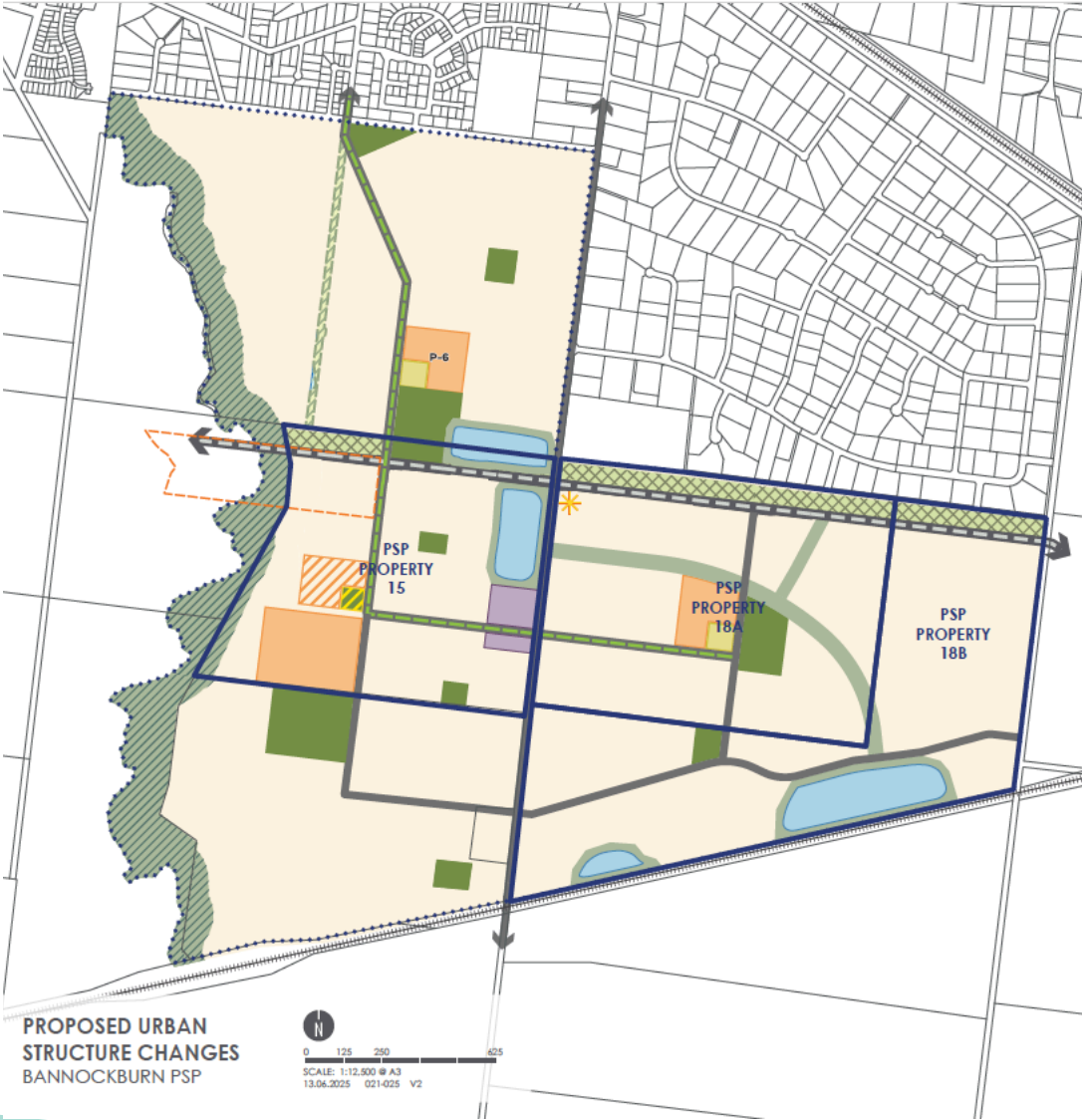
# RPG PREFERRED PLACE BASED PLAN

## LAND USE & DCP REVISED BUDGETs

Net Developable Area	Hectares	% of NDA
Net Developable Area	390.77	74.57%

Development Contribution Plans	Total
Contribution per NDA	\$365,863

The RPG Preferred Place Based Plan allows for an efficient land use with an NDA of over 74% and a DCP rate of \$365,863 which allows for a viable PSP.



# RPG SUBMISSION SUMMARY

We thank you for your consideration.

With this context in mind, we reiterate our support of the VPA's intention for the Bannockburn South East precinct to provide a positive development outcome for Golden Plains Shire that reflects the rural character and other aspirations of the Bannockburn community.

We have identified eleven specific land use and developer contribution changes related to our landholdings that improve the land use efficiency and early development potential of the landholdings.

We look forward to working with the VPA in the further development of the Bannockburn South East Precinct Structure Plan.

# PART 4 | SUPPORTING DOCUMENTATION

- Appendix 1 - Neil Cragie Submission
- Appendix 2 - Creo Transport Memo
- Appendix 3 - Tree Submission 2025 & tree submission 2023 (check date)
- Appendix 4 – Email from Bryan Scott of Ausnet re uses in Transmission Easement

# APPENDIX 1

## NEIL CRAGIE MEMO

# *Neil M Craigie Pty Ltd*

ACN 074 582 282 ABN 29 074 582 282

*Waterway Management Consultants*

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14 May 2025

Mr Mitch Trounce  
Director, Creo Civil P/L  
(By Email)

Dear Mitch,

## **RE: BANNOCKBURN SE PSP SWMS**

I refer to your request for me to review and provide comment on the stormwater management approach taken by Alluvium (see Figure 1) and to provide advice on a preferred alternative strategy which would enhance developable land area and resolve other issues.

### **MY ASSESSMENT OF THE ISSUES WITH THE ALLUVIUM STRATEGY**

1. Assets shown along the Bruce Creek frontage are poorly located, will sterilise potential developable land (the “sensitive area”), require pipelines down very steep valley slopes, and will not comply with EPA 1739.1 because of greatly increased volumetric runoff.
  - *WLRB1 concept is located on steeply sloping land and does not show where the outlet will go to Bruce Creek.*
  - *WLRB2 concept is located on a spur of high land with no outlet shown on very steep slopes. Major excavation required to service abutting land.*
  - *WLRB3 concept is squeezed into a very narrow site on another spur with no outlet shown.*
2. Assets WLRB1-3 are not required anyway and Alluvium are incorrect in stating that it is not possible to provide drainage services to land shown along the Bruce Creek frontage as the “sensitive area”.

It is feasible to build a  $\leq 20\%$  AEP capacity diversion pipe system around the Bruce Creek frontage boundary incorporating most if not all the “sensitive area” and to convey these flows to assets along Burnside Road and the railway for proper management.

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*Director Neil McKinnon Craigie BE(Civil), MEngSci, MIEAust, CPEng (Ret)*

*Email: [nmcraigie@bigpond.com](mailto:nmcraigie@bigpond.com)*

*40 Jamieson Court, Cape Schanck, Vic. 3939, Australia*

*Mobile: 0427 510 053*

- *Overland flows can be easily directed to points along the Bruce Creek frontage where they can be safely discharged.*
  - *Increases developable land including the “sensitive area”.*
  - *Fully resolves issues to do with EPA 1739.1, enhancing protection of Bruce creek corridor and eliminating drainage outfall works along the steep frontage.*
3. Ext 111 catchment should include the Cemetery=31.6 ha+5.6 ha=37.2 ha. At this size it may not be feasible to safely conduct overland flows in excess of a 20%AEP pipe via a roadway alone as implied in the Alluvium strategy.
- *Options are twin roadways or a roadway plus a drainage reserve or an open waterway in a drainage reserve.*
  - *The existing small RB on Charlton Road frontage could be converted to incorporate a sediment basin protecting a downstream open waterway.*
4. Ext 333 catchment=84.2 ha. At this size it is certainly not feasible to safely conduct overland flows in excess of a 20%AEP pipe capacity via roadways alone as implied in the Alluvium strategy.
- *An open waterway in a drainage reserve is the only feasible option.*
  - *A sediment basin will be required at the exit from Ext 333 to protect the open waterway downstream. This can be located in the power easement.*
5. Given total existing catchment size at Burnside Road at the outlet from WLRB6 exceeds 225 ha it is certainly not feasible to pipe basin outflows with overland flows in a roadway alone as implied in the Alluvium strategy.
- *Basin spillway flows cannot be safely conveyed via roadways.*
  - *An open waterway in a drainage reserve is the only feasible option.*
  - *Waterway width could be reduced by piping low flows in lieu of a low channel but this is not considered to be an appropriate environmental option for such a large catchment area.*
6. SBRB6 is not required with its eastern outlet.

- *20%AEP flows in this small catchment can be conveyed southwest to the railway line outfall asset through or around the stony rise sensitive area.*
- *Overland flows can continue eastwards from this small catchment.*

7. WLRB7 is not required.

- *Should be replaced by a sediment basin on the confluence of the Ext 333 waterway and the main waterway.*
- *Balance of treatment to be provided in main asset abutting the railway shown as RB9/WL9/WL10 by Alluvium.*

8. WLRB4 and RB9/WL9/WL10 are grossly oversized leading to significant loss of developable land. Design of WLRB4 and RB9/WL9/WL10 must be permitted to utilise capacity of the existing railway culverts and discharge existing 1%AEP peak discharges across the railway as well. The Alluvium strategy assumes the culverts will be used but peak flows for 1%AEP developed conditions must be restricted to the low capacity of those culverts.

- *It is an offence under the Water Act to unreasonably interfere with the passage of flows naturally discharged from upstream lands. VicTrack cannot ignore this by blocking access to the existing culverts for any flows emanating from land external to their reserve.*
- *It is a fact that the existing railway culverts are grossly under-sized. For example, at the RB9 outlet existing capacity is 3.07 m<sup>3</sup>/s cf. 1%AEP existing peak flow of 13.03 m<sup>3</sup>/s. A crossing with capacity not less than 13.03 m<sup>3</sup>/s needs to be provided.*
- *It is likely impractical to request VicTrack to upgrade its line and drainage assets to convey existing 1%AEP flows.*
- *It is not unreasonable for VicTrack to request the future 1%AEP developed flows out of WLRB4 and RB9 to be conveyed in a way that protects the existing crossing culverts and track.*
- *A diversion pipe going east from WLRB4 and a submerged syphon system out of RB9/WL9/WL10 created by jacking a conduit under the railway can meet all VicTrack requirements and, apart from a terminal pond abutting the south boundary of the railway reserve (at RB9), will not require any waterway upgrades downstream of the railway.*

9. Both the Alluvium strategy and any alternative cannot deal with the increased volumetric runoff discharged south of the railway to meet the targets defined in EPA 1739.1.

- *EPA Publication 1739.1 is not a compliance document. It is a guideline setting out guidance to help minimise risks from urban stormwater, so far as is reasonably practicable.*
- *EPA Publication 1739.1 sets out volume reduction targets which vary with mean annual rainfall. The volume reduction target is for mean annual impervious runoff (MAIR) and not total mean annual runoff (MAR). MUSIC modelling shows MAIR is 85% of MAR for 70% average catchment imperviousness in this area.*
- *For the 500 mm rainfall band which covers Bannockburn the priority target is 77% reduction via harvest/evapotranspiration and 5% via seepage or 82% total MAIR. Hence the 1739.1 target in Bannockburn is  $0.85 \times 82 = 70\%$  of MAR.*
- *The IWM strategy by Spiire proposes recycled water supply for irrigation of open space, maximum utilisation of infiltration and evapotranspiration via wetlands, and capture of treated water for export to offsite assets such as She Oaks Reservoir for re-use.*
- *Recycled Class A is not proposed for toilet flushing and garden irrigation so a requirement for suitably plumbed and sized raintanks on all dwellings may be feasible.*
- *Roofwater storage and reuse has been modelled in Geelong as achieving up to 20% reduction in MAR from residential development at 70% imperviousness. Wetland losses can account for at best another 10% of MAR, which leaves the balance of 40% MAR to be achieved by the offsite capture/transport/reuse approach.*
- *I have no argument against these proposals.*

### **MY SUGGESTED ALTERNATIVE SWMS**

10. Figures 2-6 illustrate my suggested alternative arrangement.

11. The total landtake for all drainage assets excluding the power easement and main road is 33.9 ha as detailed below.

<b>Asset</b>	<b>Landtake</b>	<b>Comments</b>
SB1	-	Assumed to be co-located in existing RB on north side of Charlton Rd
Waterway to WLRB1a	4.6	40 m width
SB2	0.2	Extra widening over 40 m waterway reserve
WLRB1a	3.0	External to E't
WLRB1b	5.2	External to Road and E't
Waterway to SB5	2.9	45 m width
SB4	-	In E't
SB5	0.2	Extra widening over 50 m waterway reserve
Waterway SB5 to WLRB2	3.1	50m width
WLRB2	11.5	
SBRB6	2.2	
Reserve SBRB6 to WLRB2	1.0	25 m width
Total	33.9	

12. The total landtake for the Alluvium strategy adjusted to include suggested extra waterway and SB needs is 54.42 ha as detailed below.

<b>Asset</b>	<b>Landtake</b>	<b>Comments</b>
(SB1)	-	Assumed to be co-located in existing RB on north side of Charlton Rd
Waterway to WLRB5	4.6	40 m width
(SB2)	0.2	Extra widening over 40 m waterway reserve
WLRB1	4.31	External to E't. DCP figure
WLRB2	3.21	External to Road and E't. DCP figure
WLRB3	2.34	DCP figure
WLRB4	6.46	DCP figure
WLRB5	4.57	DCP figure
WLRB6	2.35	DCP figure
Waterway (to SB5)	2.9	45 m width
(SB4)	-	In E't
(SB5)	0.2	Extra widening over 50 m waterway reserve
SBRB8	0.64	DCP figure
WLRB7	2.83	
Waterway (SB5 to WL9/WL10/RB9)	3.55	50m width. DCP figure
WL9/WL10/RB9	16.26	DCP figure
Total	54.42	

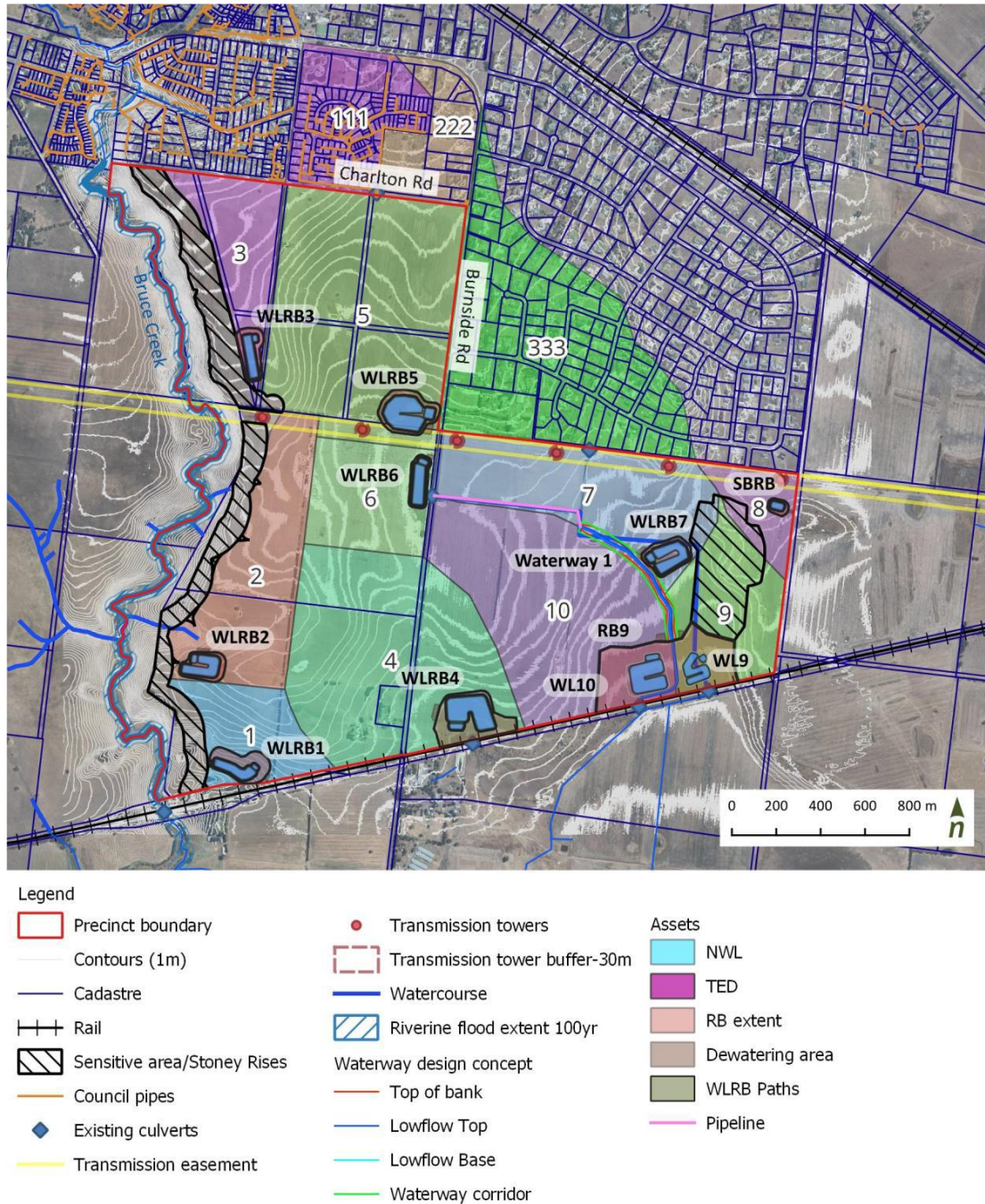
13. The suggested alternative strategy resolves all issues along Bruce Creek-the “sensitive area” can be developed, no pipe outfalls required to the creek and the creek itself is fully protected from urban runoff.
14. All sediment basins can be safely located online in waterways where shown. It is straightforward to design these to comply with velocity limits and to incorporate systems to take the basins offline for maintenance. Extra space is included in the landtake estimates (in 11 and 12 above) over and above waterway reserve areas, to provide for these considerations.
15. All wetlands incorporate standard Q1-4EY bypasses of macrophyte zones so they are effectively offline in hydrologic/hydraulic terms.
16. The railway crossing at the outlet from WLRB2 is a submerged syphon-refer to longitudinal section on Figure 5. This solution has been successfully used for the main Geelong Outfall sewer crossing at Armstrong Creek.
17. Apart from the terminal pond abutting the south boundary of the railway reserve there are no other works required downstream.

Please do not hesitate to contact me if there are any queries in regard to this advice.

Yours faithfully,



Neil M Craigie



**Figure 1** SWMS layout as proposed by Alluvium 2025.

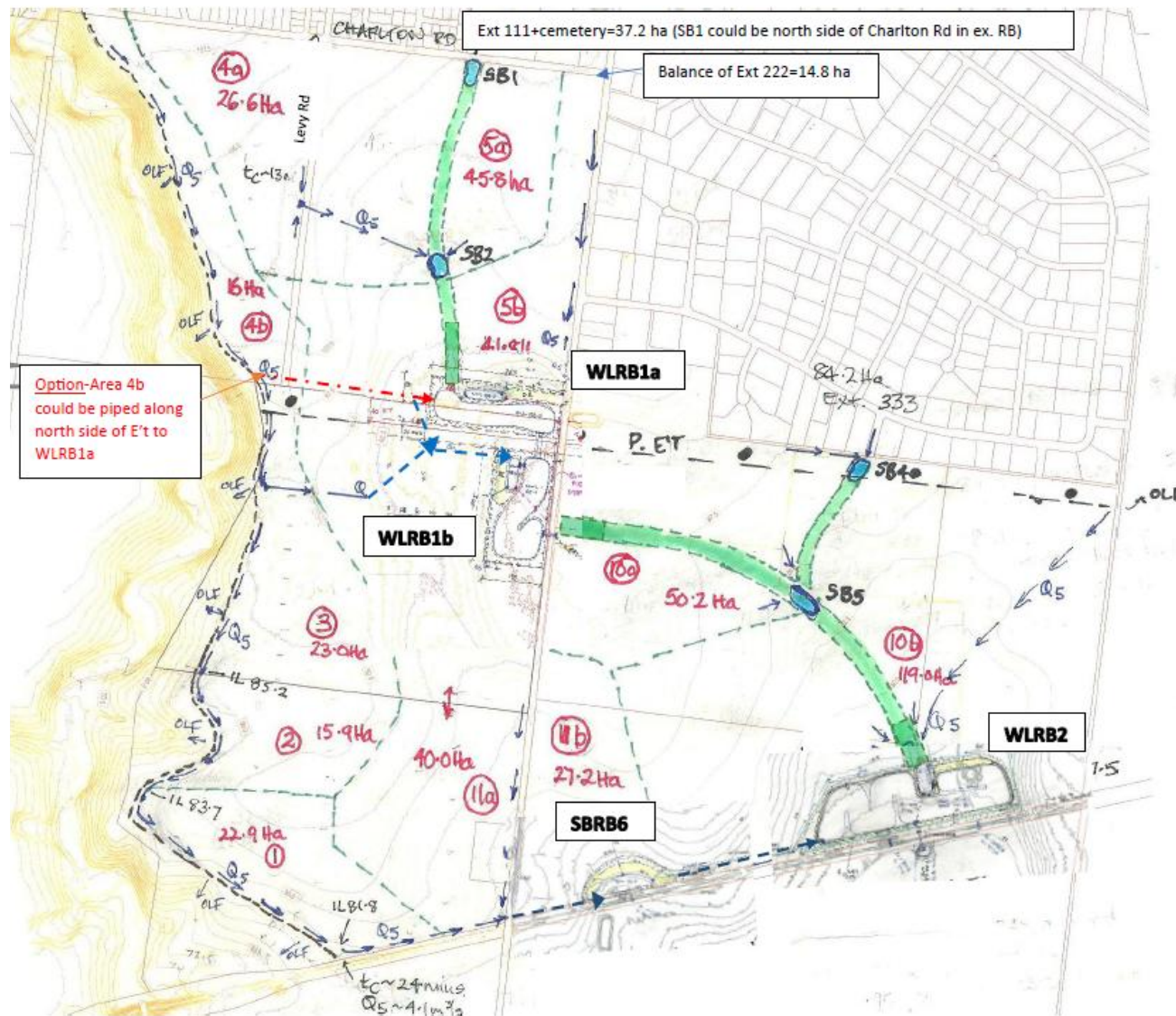
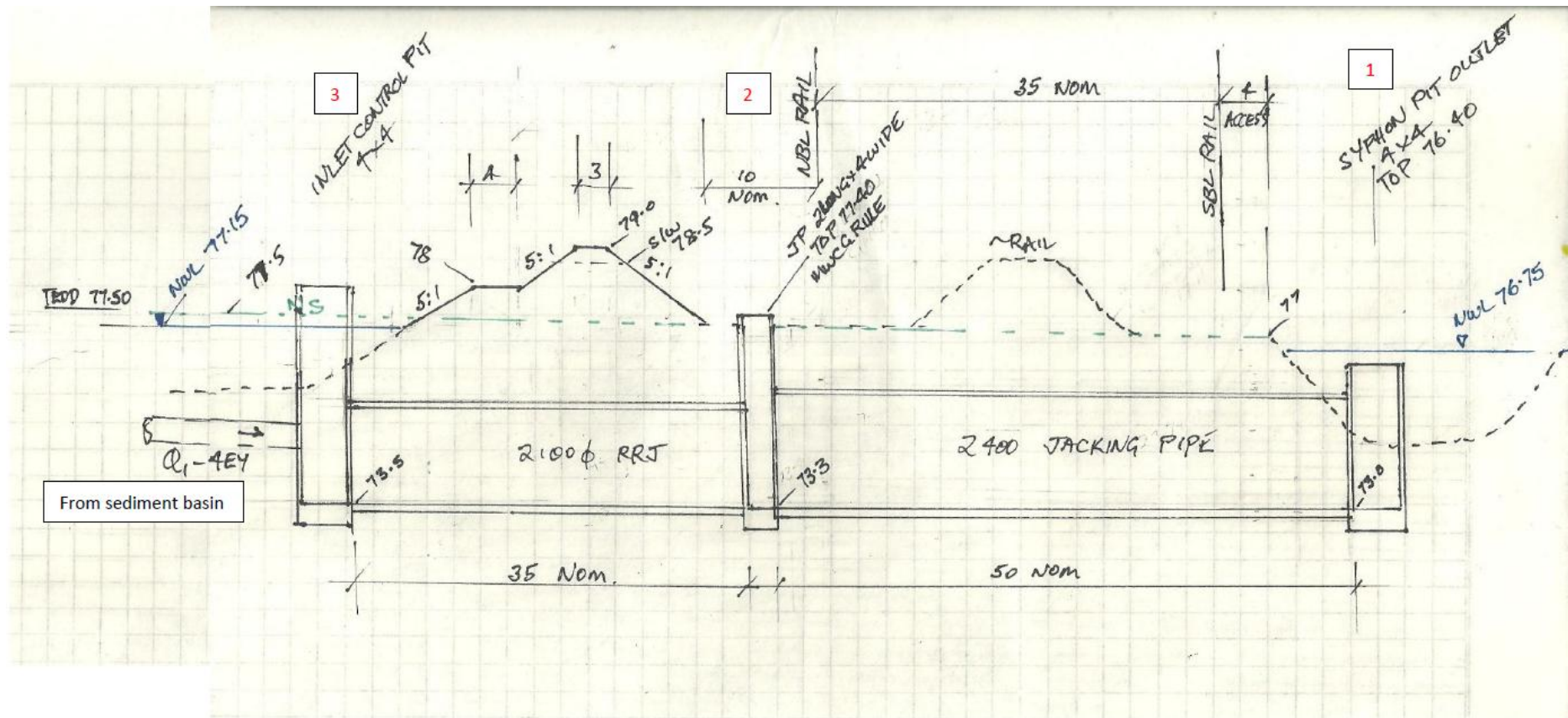


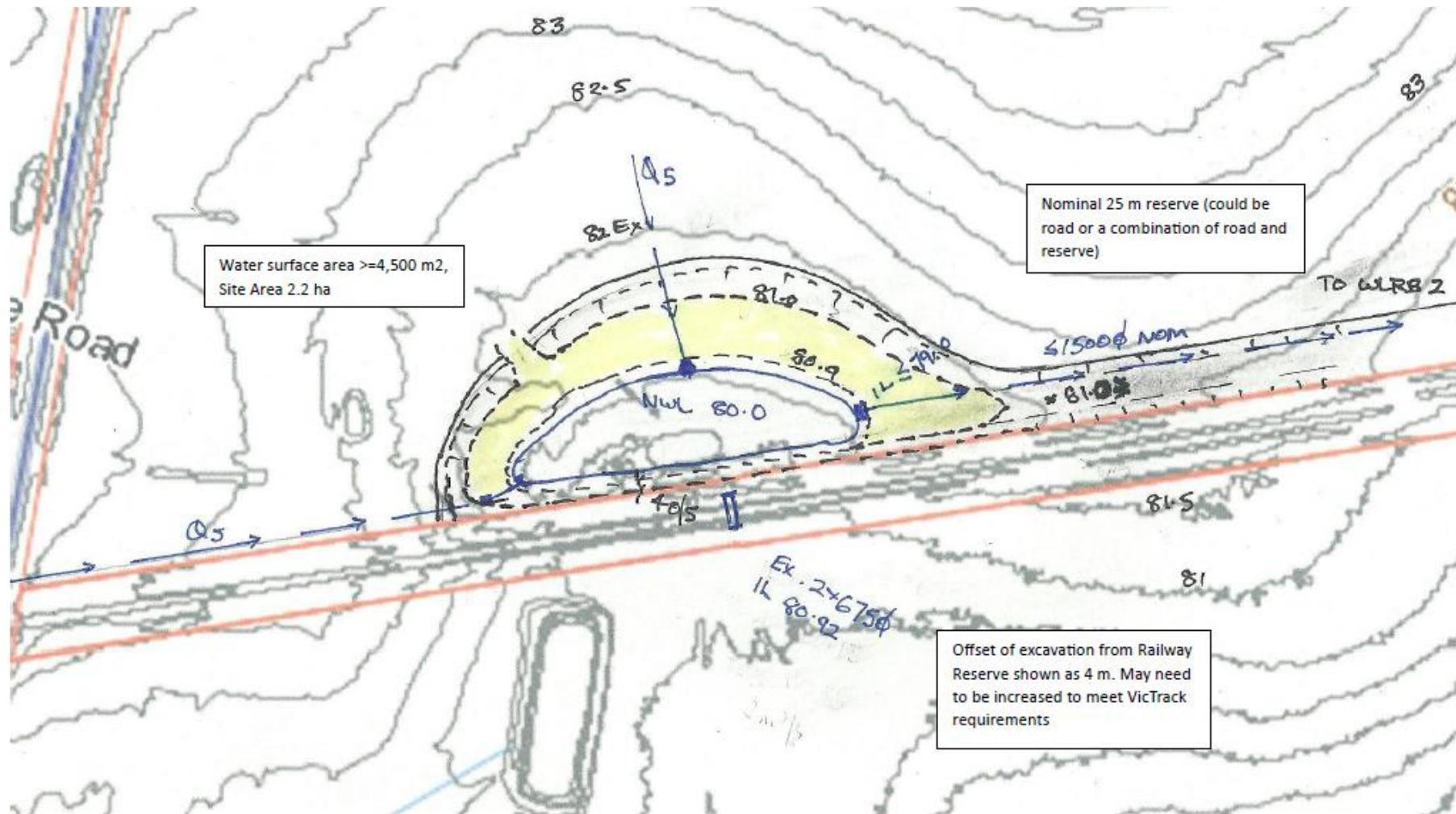
Figure 2 Suggested Alternative SWMS Layout (see Figs 3-6 for details)







**Figure 5**                      **WLRB2 concept- Main Outlet System across Railway to terminal pond**



# APPENDIX 2

## CREO TRANSPORT MEMO

Our Ref: 240113-002-L-CL-MT-BSEDCP Transport Review.docx  
Contact: Mitch Trounce

13/05/2025

Ramsey Property Group  
P.O. Box 522  
SOUTH YARRA VIC 3141

**Attention: Samantha Ramsey**

Dear Sam,

## **Bannockburn South East DCP - Review of Transport Items**

### **Introduction**

The Victorian Planning Authority (VPA) released the Bannockburn South East Precinct Structure Plan (PSP) and associated Developer Contribution Plan (DCP) for public exhibition on the 5<sup>th</sup> of May 2025. The DCP has been proposed at a rate of \$974,156/ha of Net Developable Area (NDA). This rate is significantly higher than anticipated.

The total cost of transport items in the DCP is \$79,270,176 (\$256,189/ha of NDA), which represents approximately 26% of the total infrastructure cost contained in the DCP.

The purpose of this memo is to provide a review of the DCP costs, their appropriateness and suggestions to reduce the transport infrastructure costs, thus reducing the overall DCP burden.

### **Review of the DCP**

Figure 1 shows the transport projects;



Figure 1 - Bannockburn South East DCP - Transport Projects

The transport infrastructure costs are summarised as follows;

*Table 1 – BSEDCP Transport Infrastructure Costs*

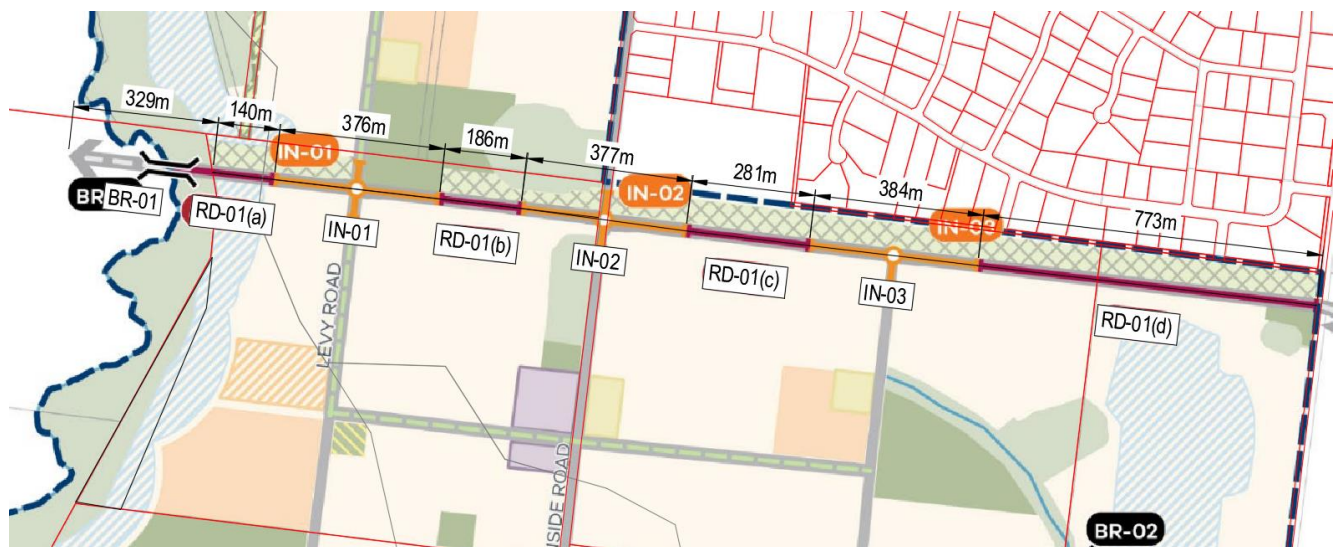
DCP Project No.	Project Description	Cost to BSEPSP	
		Land Cost	Construction Cost
RD-01	Arterial Road - Interim Construction plus Land for Ultimate (32m width)	\$ 2,008,667.00	\$ 9,925,843.00
RD-02	Burnside Road Level Crossing Upgrade	\$ -	\$ 2,000,000.00
IN-01	Levy Rd/Arterial Intersection	\$ 1,066,225.00	\$ 7,248,609.00
IN-02	Burnside Rd/Arterial Intersection	\$ 1,017,263.00	\$ 7,248,609.00
IN-03	Future Collector/Arterial Intersection	\$ 955,154.00	\$ 7,248,609.00
BR-01	Arterial Road - Bridge over Bruce Creek	\$ -	\$ 39,992,025.00
BR-02	Culvert under Collector Road	\$ -	\$ 559,172.00
<b>TOTALS</b>		<b>\$ 5,047,309.00</b>	<b>\$ 74,222,867.00</b>
<b>GRAND TOTAL (Land + Construction)</b>		<b>\$ 79,270,176.00</b>	

The DCP provides little detail on the basis of the costings apart from stating that “*Transport costs utilise high benchmarks based on Benchmark Infrastructure and Costs Guide (VPA, 2019) and will be refined at a later date with detailed design and costing work to be completed before the finalisation of the PSP and DCP package*”.

Of note is the significant cost of BR-01. 50% of the total cost (circa \$80m) has been apportioned to the Bannockburn South East PSP. Furthermore, the bridge cost is noted as being “*deliberately conservative*” in the DCP.

### Arterial Road (Excluding Bridge)

Figure 2 shows the total length of road in each portion of the arterial road. The total lengths are summarised in Table 2 below. For clarity, each length of RD-01 has been assigned a separate sub-project number;



*Figure 2 - Arterial Road Lengths*

*Table 2 - Length of Arterial Road Components*

Project No.	Project Description	Total Length (m)
BR-01	Bridge Project	329
RD-01(a)	Arterial Road between BR-01 & IN-01	140
IN-01	Levy Rd/Arterial Intersection	376
RD-01(b)	Arterial Road between IN-01 & IN-02	186
IN-02	Burnside Rd/Arterial Intersection	377
RD-01(c)	Arterial Road between IN-02 & IN-03	281
IN-03	Collector/Arterial Intersection	384
RD-01(d)	Arterial Road east of IN-03	773
	<b>Total Length</b>	<b>2846</b>

The total length of the RD-01 projects is summarised in Table 3. As outlined, the estimated cost per lineal metre of road is approximately \$7,192.

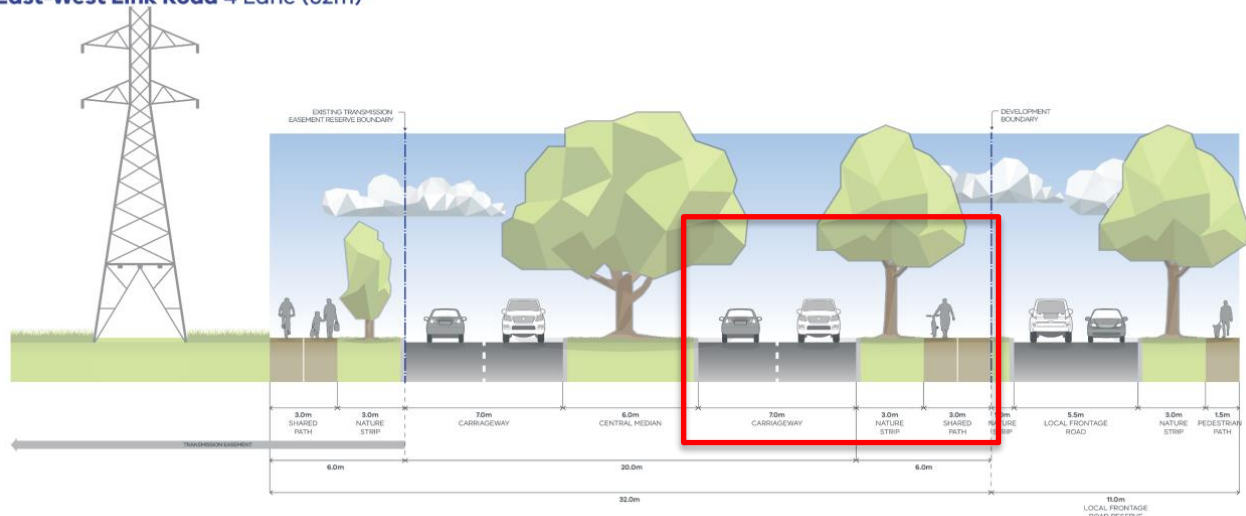
*Table 3 - Arterial Road - Cost Per Metre*

Total Length of RD-01	1380m
Total Cost of RD-01	\$ 9,925,843.00
<b>Cost per metre</b>	<b>\$ 7,192.64</b>

The VPA benchmark cost for a Primary Arterial Road under interim conditions is \$3,395,000 for 800m of road equating to \$4,243.75 per metre expressed in 2018 dollars. Applying the VPA adopted indexation factor of 1.29 to reflect current day costs results in an updated rate of \$5,474.45 per metre. This indexed rate remains significantly lower than the rate calculated in Table 3.

Figure 3 illustrates the assumed extent of the interim arterial road cross section within the BSEPSP, while Figure 4 presents the corresponding VPA benchmark cross section. As highlighted, the two cross sections are consistent in scope and design, thus, there is no clear justification for the higher cost per metre.

**Cross Section 1**  
**East-West Link Road 4 Lane (32m)**



*Figure 3 - BSEPSP Arterial Road Cross Section*

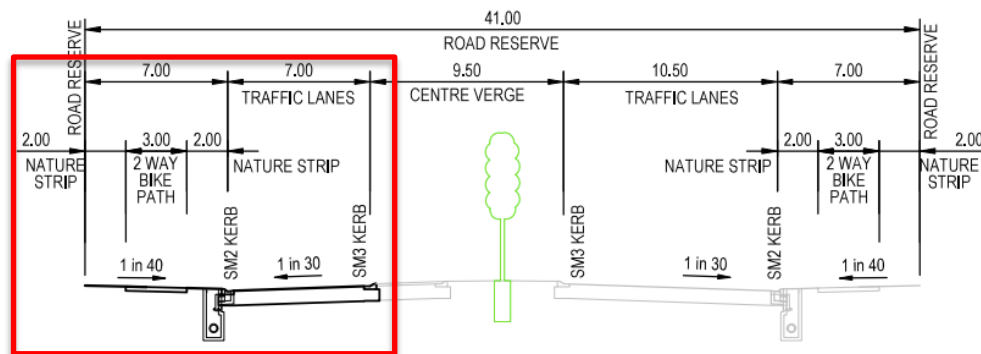


Figure 4 - VPA Benchmark Costings - Arterial Road Cross Section

## Intersections

As shown in Figure 2 the DCP proposes three intersection projects along the proposed arterial road:

- **IN-01:** A four-way signalised intersection between the proposed arterial and Levy Road, which is noted as a connector street–boulevard in the PSP.
- **IN-02:** A four-way signalised intersection between the proposed arterial and Burnside Road, noted as a connector street in the PSP.
- **IN-03:** A three-way signalised intersection between the proposed arterial and a proposed north–south collector road.

Each intersection project has been assigned the same cost of \$7,248,609.00 albeit intersection IN-03 is a three-way intersection and the other two intersections are four-way intersections.

The VPA benchmark cost for a Primary/Connector Blvd Signalised Cross Intersection is \$4,104,000 expressed in 2018 dollars. Applying the VPA indexation rate of 1.29 results in an updated cost of \$5,294,160 in current-day terms.

Similarly, the benchmark cost for a Primary/Connector Blvd Signalised “T” Intersection is \$3,460,000 expressed in 2018 dollars. Utilising the indexation rate of 1.29, the cost increases to \$4,463,400.

It appears (although it cannot be confirmed) that the DCP has adopted the 90<sup>th</sup> percentile cost estimate for the Primary/Connector Blvd Signalised Cross Intersection and applied an additional 20% premium. On face value, these cost assumptions appear to be overly conservative.

It is important to note that the intersection extents are generally consistent with the benchmark reference plans (i.e.. 370m long).

## Bridge

### Costing

As previously noted, the BSEDCP attributes a cost of \$39,992,025.00 to the bridge component, representing 50% of the total project cost of \$79,984,050.

The VPA states the following in relation to the bridge costing;

*“The DCP adopted \$79,984,050 for the total cost of the interim bridge. This is based on:*

- *Bridge – Base Cost \$66,653,375*
- *Cut & Fill Allowance \$6,665,338 (10% applied to the base cost)*
- *Sodic Soils Allowance \$3,332,669 (5% applied to the base cost)*
- *Miscellaneous Allowance \$3,332,669 (5% applied to the base cost) “*

The *Bannockburn South East Precinct Bridges Feasibility Assessment*, prepared by Jacobs and dated 17/04/2025, identifies the “most likely” (P50) cost estimate for the bridge as \$55,370,000, and the “pessimistic” (P90) cost estimate as \$61,520,000. It is unclear how the VPA have derived at a base cost of \$66,653,375, as it exceeds even the P90 estimate outlined in the assessment.

Furthermore, the VPA have applied an additional 20% markup to the cost estimate to account for factors such as cut and fill, sodic soils, and miscellaneous allowances. Given that the base estimate already adopts a conservative approach, this further loading appears overly conservative and almost certainly overstates the true project cost.

### Design

Further to the Jacobs Feasibility Assessment, there appears to be limited justification for selecting the more costly and significant Option 2 (330m long bridge) over Option 1, which involves a low-level structure combined with earthworks along the escarpment leading to Bruce Creek. Notwithstanding cultural and ecological constraints, Option 1 represents a significantly more cost-effective solution. As such, a clear and robust justification should be provided if Option 2 is adopted as the final design.

### Apportionment

There is no clear evidence supporting the allocation of 50% of the bridge project cost to the BSEDCP. It appears that the remaining 50% may have been attributed to the "Future Growth Option – South" and/or the Bannockburn South West Precinct, as outlined in the gazetted *Bannockburn Growth Plan (BGP)* (refer to Figure 5).

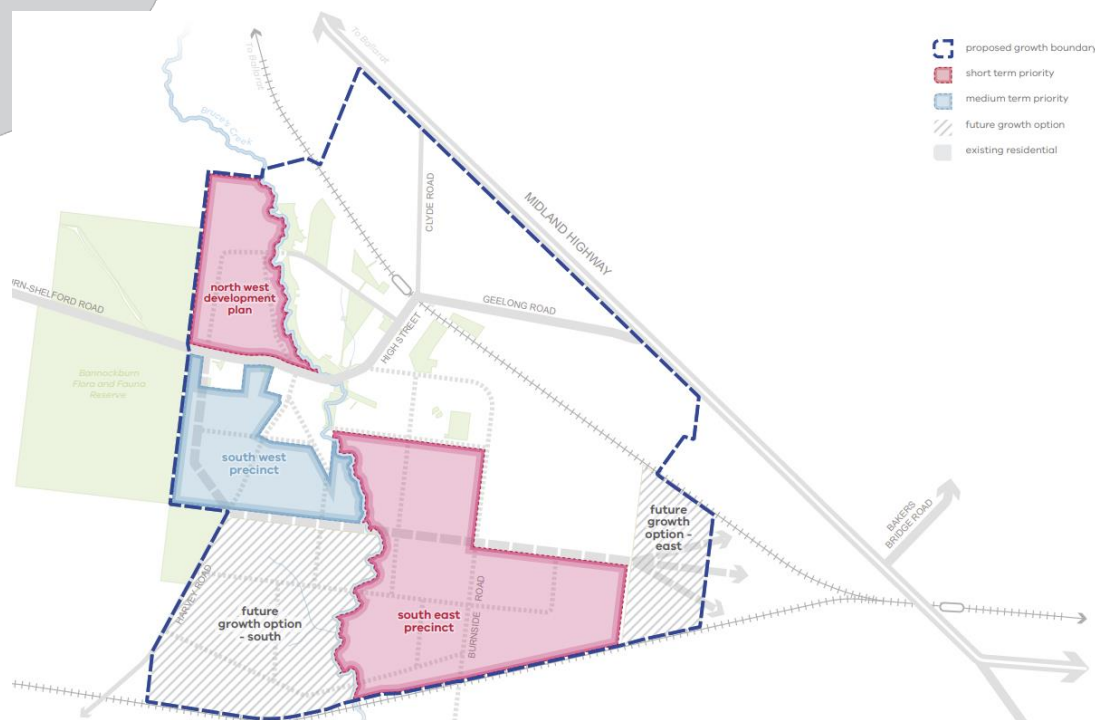


Figure 5 - Bannockburn Growth Plan

Figure 2 of the gazetted *Bannockburn Growth Plan (BGP)* outlines a "medium growth model" requiring the delivery of an additional 5,500 dwellings by 2050 in Bannockburn. According to the BGP, the three identified short-to-medium term growth areas, being Bannockburn North West, South East and South West, are expected to deliver a combined 6,192 dwellings.

The BGP was developed on an average housing density of 12 lots per ha of net developable area (NDA), whereas the target for BSEPCP has been set at 15 lots per ha of NDA. This revised housing density will increase the number of lots delivered in the three precincts to circa 7,740, some 2,240 more than the 2050 housing prediction.

As a result, it can be reasonably concluded that the Future growth option – South area (ie. the nexus for delivery of the bridge project) will not need to be developed until sometime after 2050. This timeframe falls well beyond the recommended 20–25 year maximum time horizon outlined in the Developer Contribution Guidelines and therefore its inclusion into the BSEDCP may be considered premature and potentially unreasonable.

Notwithstanding, if the bridge project were to remain in the PSP, a needs analysis should be conducted to determine the true nexus for delivery of this significant project. This will provide a more reasonable apportionment figure based on evidence.

## Land

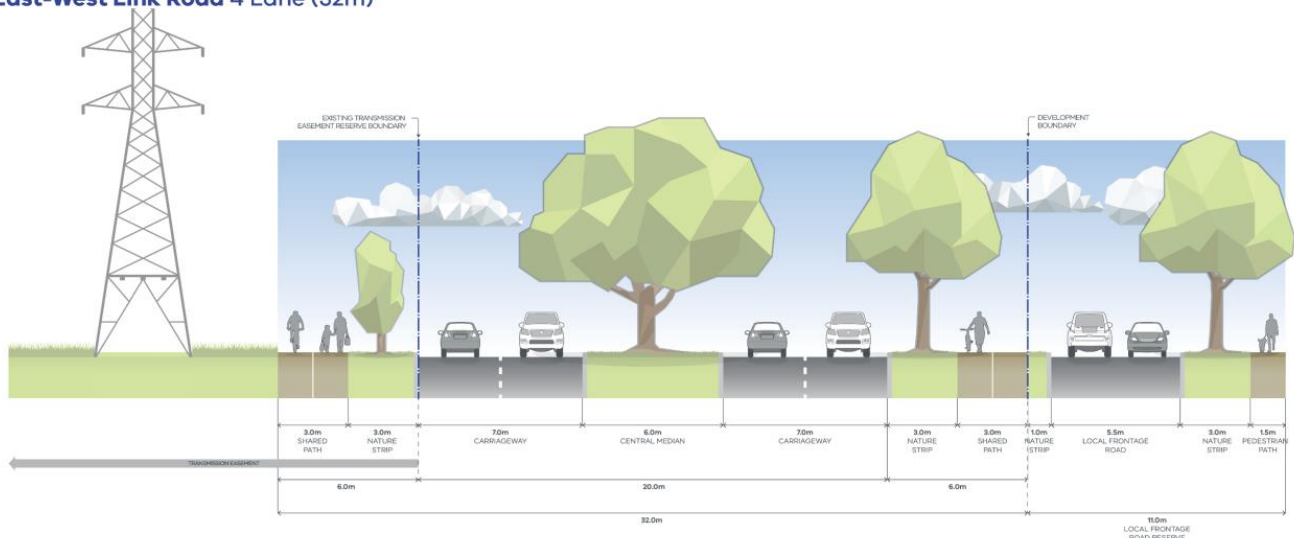
The DCP proposes land acquisition for the ultimate arterial road, as well as the intersections. All land has been valued at \$700,000/ha. Table 4 summarises the land acquisition area and cost to the DCP;

*Table 4 - Land acquisition for Transport Items*

DCP Project No.	Project Description	Land Area	Land Acquisition Cost
RD-01	Arterial Road - Interim Construction plus Land for Ultimate (32m width)	2.87ha	\$ 2,008,667.00
IN-01	Levy Rd/Arterial Intersection	1.52ha	\$ 1,066,225.00
IN-02	Burnside Rd/Arterial Intersection	1.45ha	\$ 1,017,263.00
IN-03	Future Collector/Arterial Intersection	1.36ha	\$ 955,154.00
	<b>TOTALS</b>	<b>7.20ha</b>	<b>\$ 5,047,309.00</b>

Figure 6 shows the proposed cross section of the arterial road. Notably, 6m of the cross section is located within the Ausnet High Voltage Transmission Easement, 20m of the cross section is the dual carriageway (including 6m wide median), and there is another 6m verge (including shared path) on the development side.

**Cross Section 1**  
**East-West Link Road 4 Lane (32m)**



*Figure 6 - Arterial Road Cross Section*

It is unclear how the land acquisition has been calculated. It appears that land associated with the 20m wide dual carriageway has been included in the funding, whilst the 6m verges to the north and south have not. The exclusion of land contained within the Transmission Easement is appropriate, as this land is undevelopable.

However, the land required to deliver the 6m verge on the south side of the arterial road should be funded by the DCP as the developer should not be reasonably required to deliver land outside of the "development boundary" per Figure 6.

Similarly, the approach to land acquisition at intersection locations lack clarity. It appears that significant allowances have been made for intersection flaring and possibly for intersection stubs, resulting in land requirement that seems greater than necessary.

## Cost Saving Opportunities

Through the review, a number of cost saving opportunities have been identified;

- Adoption of locally adjusted VPA Benchmark Costings
- Removal of Bridge Project
- Reduction of RD-01 Scope and Downgrading of IN-01 & IN-03
- Review of DCP Funded Land Acquisition Costs

Each option or opportunity is detailed as follows;

### Adoption of Locally adjusted Benchmark Costings

In 2018, the Victorian Planning Authority (VPA) undertook a comprehensive benchmark costing exercise aimed at streamlining the development of future ICP's in new growth areas. The costs contained within the Benchmark Infrastructure Costings (BIC) were collected from a broad range of growth areas and projects, producing a set of robust cost estimates suitable for use anywhere across Victoria.

Creo Civil considers the BIC rates to be a generally fair representation of infrastructure costs. However, it is important to note that the BIC does not take into consideration site specific items/adjustments, which may influence actual project costs.

Creo Civil have prepared revised cost sheets for the key DCP projects, adjusting rates and quantities as deemed appropriate to respond to local conditions. Note also that it suggested that the contingency is increased from 15% to 20% noting the following site specific reasons;

- Local geological conditions (Newer Volcanics Group) which is likely to contain moisture reactive high plasticity clays overlying Basalt Rock (therefore risk of additional subgrade improvement being required)
- Unknown scope and actual costs related to the required service relocation works (to be determined by authorities) – particularly telecommunications assets.
- Likely presence of shallow rock.
- No allowance for site specific CHMP and the implementation and management of its requirements.

Utilising the above methodology, the following rates could be adopted;

*Table 5 - Recommended Rates for Arterial Road Projects*

Project Description	Rate	Unit
Arterial Road (Interim)	\$ 5,600.00	/m
Arterial/Collector Road Cross Intersection	\$ 5,365,000.00	/Intersection
Arterial/Collector Road "T" Intersection	\$ 4,715,000.00	/Intersection

### Recommendation #1 – Adopt adjusted Benchmark costings as outlined in Table 5

#### Removal of Bridge Project

As outlined in the preceding section, the inclusion of project BR-01 appears to be an unreasonable addition that conflicts with the intent of the published DCP guidelines. The bridge will not be required until significant development occurs within the Future South Growth Option area. Accordingly, the cost of this infrastructure should be fully apportioned to that future growth area or alternatively, be funded by the State.

### Recommendation #2 – Remove Project BR-01 from the DCP

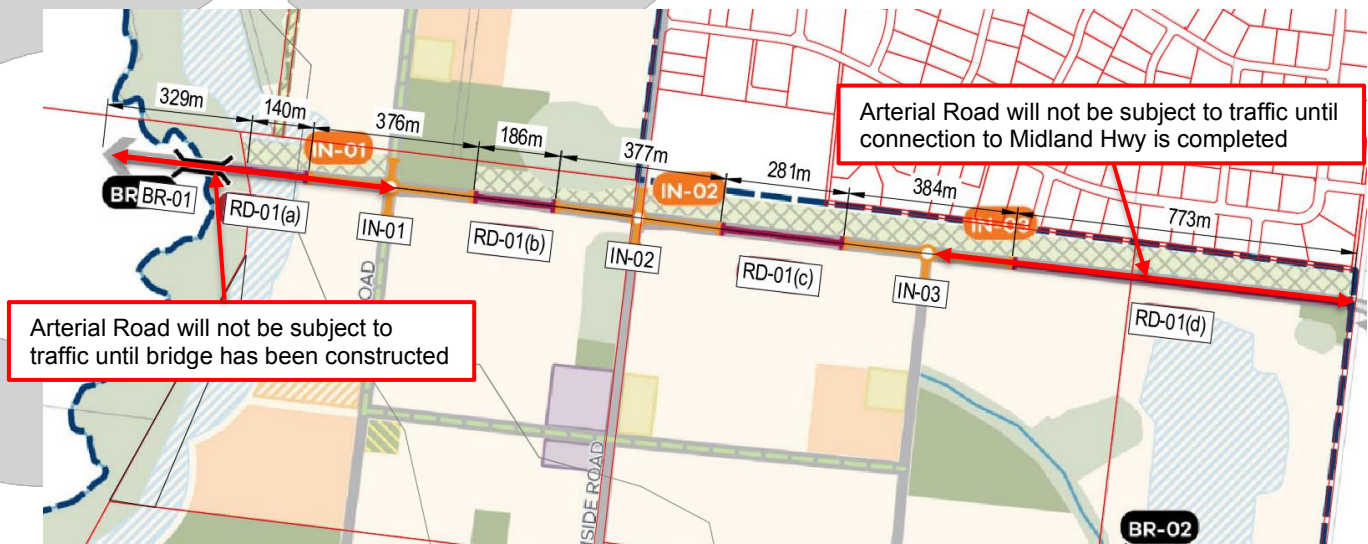
#### Reduction of RD-01 Scope & Downgrading of IN-01 & IN-03

Given that no development frontage is proposed along the east/west arterial road, it is evident that two key sections of the arterial road will not be subject to traffic until other infrastructure items are complete. Constructing these sections prematurely is not recommended, as the absence of traffic over a significant period of time may lead to early pavement deterioration, due to the lack of early compaction typically provided by traffic loads.

As per advice in relation to BR-01, infrastructure items that are likely to not be required within the maximum time horizon set out in the DCP guidelines should not be included in the DCP.

Figure 7 highlights the sections of arterial road that should not be constructed, and therefore removed from the DCP.

To be clear, the land component should remain to ensure free and open access for future delivery. This opportunity only relates to the sections of road west of IN-01 and east of IN-03.



*Figure 7 - Sections of Arterial Road recommended to be removed from the BSEDCP*

Further to the above, consideration should also be given to the downgrading intersections of IN-01 and IN-03 to unsignalised interim "T" intersections. These intersections should be designed to allow for seamless future upgrades to a signalised standard in the future, without requiring significant rework.

The delivery of these road sections should either be 100% apportioned to the Future South/East Growth Area's or funded by the State.

**Recommendation #3 – Remove sections of RD-01 west of IN-01 and east of IN-03 & downgrade IN-01 & IN-03 to unsignalised intersections.**

### Review of DCP Funded Land Acquisition Costs

As outlined earlier in this memo, the methodology used to calculate the land acquisition requirements for the arterial road and its associated intersections is unclear.

The following recommendations are made in relation to land projects;

- 26m of land acquisition outside of the transmission easement should be funded by the DCP.
- Land required for intersection "flaring" should be covered by the DCP. Note also that intersections will likely need to offset to the south to be clear of transmission easement. (Allow 32m width plus 5m average across the length of the intersection)
- No allowance should be made for stubs north and south of each intersection.

Table 6 summarises the recommended land acquisition projects;

*Table 6 – Adjusted Land Acquisition Projects*

Project No.	Project Description	Total Length (m)	Width (m)	Land Acquisition (m2)
BR-01	Bridge Project	329	0	0
RD-01(a)	Arterial Road between BR-01 & IN-01	140	26	3640
IN-01	Levy Rd/Arterial Intersection	376	37	13912
RD-01(b)	Arterial Road between IN-01 & IN-02	186	26	4836
IN-02	Burnside Rd/Arterial Intersection	377	37	13949
RD-01(c)	Arterial Road between IN-02 & IN-03	281	26	7306
IN-03	Collector/Arterial Intersection	384	37	14208
RD-01(d)	Arterial Road east of IN-03	773	26	20098
	<b>Total Length</b>	<b>2846</b>		<b>77949</b>

Notwithstanding the above analysis, more detailed work (in the form of concept designs for the intersections) should be completed to confirm the land required in more detail prior to progressing to the Planning Panel.

**Recommendation #4 – Complete concept designs for intersections and generally adopt the revised methodology as outlined in Table 6 to confirm land acquisition required.**

## Summary & Conclusion

Adopting the above recommendations, Table 7 summarises the proposed revised Transport DCP items;

*Table 7 - Revised DCP Cost Sheet Adopting All Recommendations*

DCP Project No.	Project Description	Cost to BSEPSP	
		Land Cost	Construction Cost
RD-01	Arterial Road - Interim Construction plus Land for Ultimate (32m width)	\$ 2,511,600.00	\$ 2,615,200.00
RD-02	Burnside Road Level Crossing Upgrade	\$ -	\$ 2,000,000.00
IN-01	Levy Rd/Arterial Intersection	\$ 973,840.00	\$ 1,500,000.00
IN-02	Burnside Rd/Arterial Intersection	\$ 976,430.00	\$ 5,365,000.00
IN-03	Future Collector/Arterial Intersection	\$ 994,560.00	\$ 1,500,000.00
BR-01	Arterial Road - Bridge over Bruce Creek	\$ -	\$ -
BR-02	Culvert under Collector Road	\$ -	\$ 559,172.00
	<b>TOTALS</b>	<b>\$5,047,309.00</b>	<b>\$13,539,372.00</b>
	<b>GRAND TOTAL (Land + Construction)</b>		<b>\$18,586,681.00</b>

Overall, adopting the above 4No. recommendations represents a potential saving of over \$60m (almost \$200,000/ha of NDA) to the DCP.

Yours sincerely,  
**Creo Civil Consultants**

**Mitch Trounce**  
Director

# APPENDIX 3

## TREE SUBMISSION 2025 & TREE SUBMISSION 2022



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info@ramseypg.com.au  
www.ramseypg.com.au

PO.Box 522  
South Yarra VIC, 3141  
Offices in South Yarra & Queenscliff

Victorian Planning Authority  
Strategic Planning Manager  
By Email

Attention Sarah Salem

21<sup>ST</sup> October 2022

Dear Sarah,

**RE: BANNOCKBURN SOUTH EAST PRECINCT STRUCTURE PLAN  
Proposed Tree Retentions**

As per earlier correspondence, we welcome the VPA's openness to receiving additional feedback and information through the PSP process. One area that the vision and principles and co-design workshops have touched on is the existing trees on site and which trees might be noted as suitable for retention and which ones are not.

As previously advised in the workshops and also in the earlier pitching session, Ramsey Property Group has a strong vision of having suitable trees being delivered in the ultimate built form of the precinct. We feel that suitable street and neighborhood trees and the associated canopy cover is a vital component of a successful community and environment that ultimately is in the best interest of all stakeholders.

In developments previously undertaken by Ramsey Property Group, we feel that there are some great examples of both working the development with existing mature trees and also delivering a strong planted tree community as part of the development. We have also had experiences working with existing trees that whilst initially retained with all of the right 'intent' have resulted in delivered outcomes that were not to a standard we would wish for the development and community.

We would strongly encourage you to drive through the Manna Gum Estate and Berthon Park Estate (Appendix 1) both off Common Road in Inverleigh, to see how RPG has worked with the existing mature trees that form a key part of the RPG developments, noting that these are both Low Density Residential Developments with larger lot sizes giving some additional flexibility on where the mature trees sit in the built form. Further, the Glenmore Estate is a conventional density residential estate where we have incorporated significant trees and we would encourage you to look at this project as well (Appendix 2).

We would also note the outcomes within the Glen Avon Estate in Burnside Road Bannockburn (Appendix 3) which directly abuts the Bannockburn South East Precinct. This estate has examples of sections of Monterey Cypress rows that have been retained in whole or in part which has resulted in some poor aesthetic, environmental and planning outcomes. As part of the street tree planting in this estate, we also note that very careful species selection is a key component of developing in this part of Bannockburn with many species, including some indigenous species not coping well with the local environment.

As part of the plans presented and commented on at the Co-Design workshop it is noted that the plans circulated prior to the workshop and the plans presented during the workshop have some differences in relation to both how the trees that are listed as high retention value and moderate retention value are depicted, and also some differences in how they are noted as being retained. There is also some ambiguity on the intention of the 'historic planting' trees and whether these are intended to be treated.

We also note separate correspondence between Golden Plains Shire and John OShannassy and Jason Black on the topic of tree retention and the accompanied tree retention plan prepared by Council. We understand that the Golden Plains Shire position has also been sent to the VPA and we have copied them in to this letter.

Noting all of the above, **Ramsey Property Group is strongly in favor of retaining the River Red Gums and other similar critical value trees within the precinct where practicable, noting that there are no other critical value tree species located on the RPG landholdings.** However, we note that the retention of trees that are not of a high environmental value can have impacts that ultimately result in poor environmental, aesthetic, land use and planning outcomes.

It is further noted that many of the tree species that have been proposed to be retained (Monterey Cypress (*Hesperocyparis acrocarpa*), Desert Ash (*Fraxinus angustifolia* subsp. *Angustifolia*), Sugar Gum (*Eucalyptus Cladocalyx*) and Monterey Pine (*Pinus radiata*)) are listed by DELWP as environmental weeds and further that Weeping Willow (*Salix babylonica*) is listed by DELWP as a noxious weed. It is considered that the required retention of these species will result in a poor environmental outcome from the precincts development and we do not support their retention.

[https://www.environment.vic.gov.au/\\_data/assets/excel\\_doc/0027/563607/Advisory-list-of-environmental-weeds-in-Victoria\\_2022.xlsx](https://www.environment.vic.gov.au/_data/assets/excel_doc/0027/563607/Advisory-list-of-environmental-weeds-in-Victoria_2022.xlsx).

[https://www.ari.vic.gov.au/\\_data/assets/pdf\\_file/0027/125919/ARI-Technical-Report-287-Advisory-list-of-environmental-weeds-in-Victoria.pdf](https://www.ari.vic.gov.au/_data/assets/pdf_file/0027/125919/ARI-Technical-Report-287-Advisory-list-of-environmental-weeds-in-Victoria.pdf)

It is noted that some of the trees proposed to be retained are part of and typically the end most trees in an existing row of trees. Typically and as has been evidenced in the Glen Avon Estate to the north east of the precinct when a row of Monterey Cypress have part of the row removed, the side of the remnant tree that is adjacent to the removed trees has a large section of 'dead' wood and little to no foliage. This 'face' of the tree typically takes a significant time to regenerate and in many instances never fully does. There are numerous displays of this in the immediate neighborhood, photo 4 (in Appendix 4) depicts an example of these.

It is noted that multiple trees that are located adjacent to existing or proposed constructed waterways are listed to be retained. It is considered that these locations are typically likely to have considerable earthworks in the vicinity as part of development, with filling of the adjacent developable area being required and the waterway and stormwater treatment nodes (wetlands and detention basin) likely to have reasonably significant areas of excavation and reshaping. Working around these three trees is considered likely to result in considerably constrained designs and efficiency in their footprints and capital costs. Unless these trees are listed as of critical value, it is strongly recommended that these trees not be listed for retention.

Similarly, many of the trees and particularly the Monterey Cypress proposed to be retained have significant tree protection zones and structural root zones. In order to attempt to retain them, significant areas around the trees will need to remain undisturbed. In order to do this, significantly larger road or public reserves, or oversized lots would need to be provided to achieve this, ultimately negatively impacting on the delivered form of the precinct. It is further noted that as per the ENSPEC report, it is anticipated that even the healthy specimens of this species are likely to be affected by Cypress Canker and ultimately die in the short to medium term. It is considered that the retention of these trees will result in poor aesthetic and planning outcomes.

It is noted that some of the plantation sugar gums have been coppiced and are at risk of sudden structural failure and ENSPEC recommend that they are not suitable for retention in private properties, nor in high traffic areas and would require a significant buffer area if retained. It is noted that it is not only the area of the tree row that needs to be retained, however if an additional area equal to the height of the trees (estimated at 20m tall) is added, then an area is significantly large would need to be set aside from development. Despite this land take, a significant ongoing public safety and maintenance burden will need to be borne into the future.

The enclosed tree retention response spreadsheet outlines the background data as well as RPG's position on all of the trees contained within our landholdings in more detail.

Based on all of these reasons, it is strongly recommended that the non indigenous trees of less than critical value not be listed as to be retained, and further that the retention of many of the trees will result in poor environmental, planning and aesthetic outcomes.

RPG would support wording to the effect that some retention could be considered, where appropriate, subject to an arborists assessment and approval to retain.

Should you wish to discuss any of the above in more detail, or undertake a site inspection to look at individual trees on their own merits, we would welcome further discussion.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Leigh Prossor', is positioned below the 'Yours faithfully,' text.

Leigh Prossor

APPENDIX 1  
MANNAGUM & BERTHON PARK ESTATES



APPENDIX 2  
GLENMORE ESTATE



APPENDIX 3  
GLENAVON ESTATE



## APPENDIX 4 TREE RESPONSE PLAN

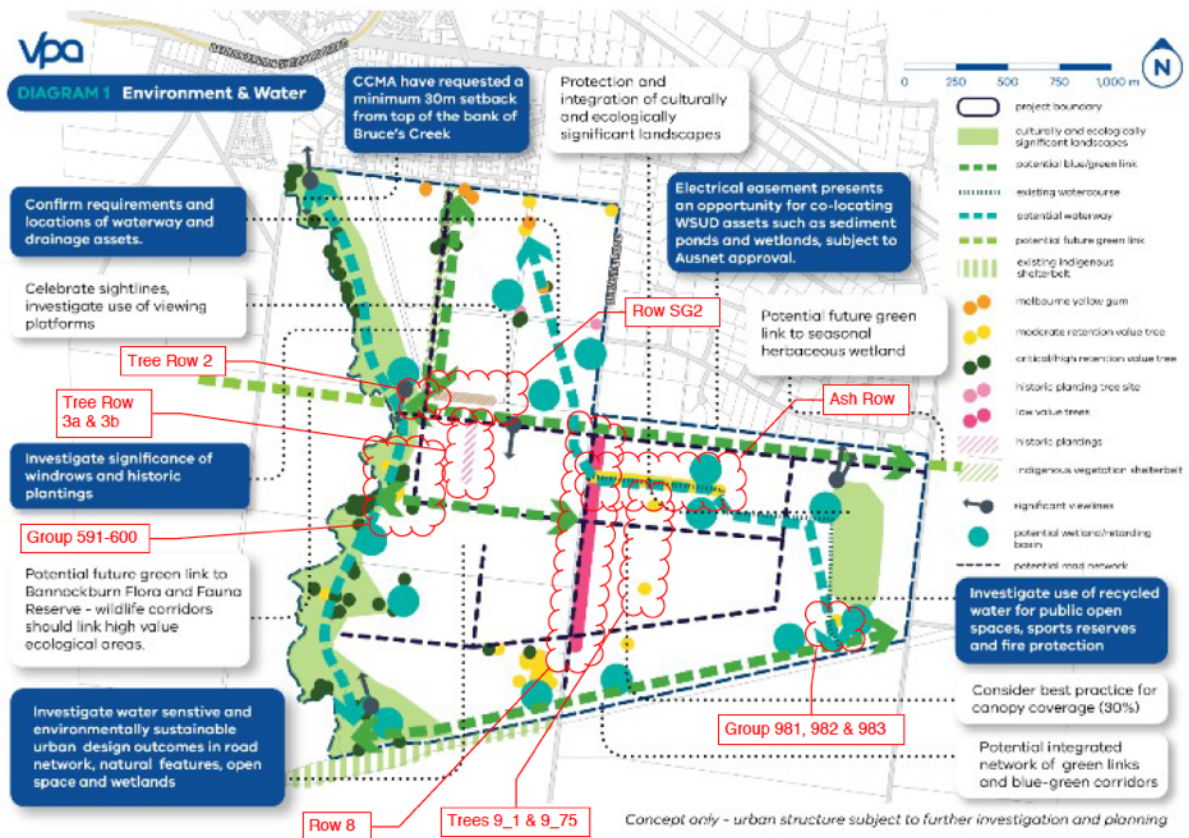


PHOTO 1



PHOTO 2



PHOTO 3



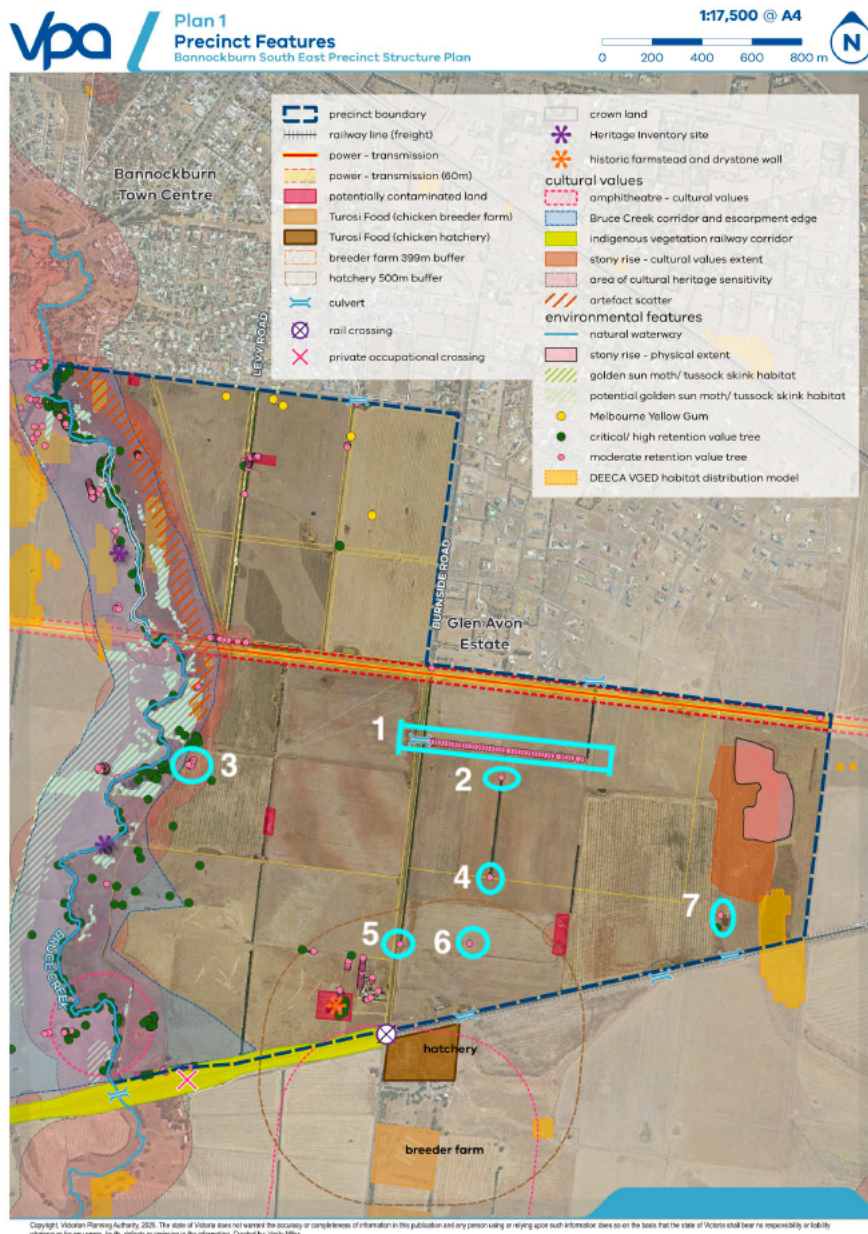
PHOTO 4



## Tree Retention Submission

June 2025

In September 2022, RPG identified a number of medium retention trees which are weeds or similar to be removed and submitted to the VPA requesting removal of these trees from the Precinct Features Plan as moderate retention. We again request the removal of the label of Moderate Retention for these trees.



## **1. Ash Row Claret Ash and Desert Ash**

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### **Rationale for removal**

1. It is noted that the desert ash (*Fraxinus angustifolia* subsp. *Angustifolia*) is listed as an environmental weed of Very High Risk in Victoria.
  2. Any requirement to retain these trees and the existing surface levels in their vicinity will result in considerably constrained designs and efficiency in their footprints and capital costs. These trees are shown in photo 3.
- It is considered that these are all poor planning, aesthetic and environmental outcomes. It is strongly recommended that these trees not be listed for retention.

## **2. & 4. Trees 9\_1 and 9\_75 Monterey Cypress**

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### **Rationale for Retention**

1. It is noted that Monterey Cypress (*Hesperocyparis acrocarpa*) are listed as environmental weeds in Victoria by DELWP and as such we recommend that these be removed as part of the development process.
  2. Both tree 9\_1 (northern tree in the row) and tree 9\_75 (southernmost tree in the row) are listed as being of 'sparse' health in the ENSPEC, and also as noted by ENSPEC, 'It is considered highly likely that these trees are, or will be, affected by Cypress canker and as such, will continue to decline in condition and value'.
  3. Typically, when a row of Monterey Cypress have part of the row removed, the side of the remnant tree that is adjacent to the removed trees has a large section of 'dead' wood and little to no foliage. This 'face' of the tree typically takes a significant time to regenerate and in many instances never fully does. There are numerous displays of this in the immediate neighbourhood neighbourhood, photos 4 & 5 depict examples of these.
  4. Trees of these type and size are not considered to be suitable for retention in a 'regular sized housing lot' and having a tree protection zone of 10.8m and structural root zone of 3.4m would require a significant area of non disturbance around them to enable safe retention. Accordingly, they would likely need to be retained either in a park, or in a significantly large lot to enable safe retention.
- It is considered that these are all poor planning, aesthetic and environmental outcomes. Accordingly, it is recommended that these trees not be listed for retention.

## **3. Mixture River Red Gum, Pepper Trees [Group 591 – 600]**

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### **Rationale for Removal**

Support critical retention trees (River Red Gum) being retained, however note that Pepper Trees (*Schinus molle*) and Monterey Cypress (*Hesperocyparis acrocarpa*) are both listed as environmental weeds in Victoria by DELWP and as such we recommend that these be removed as part of the development process.

## **5. Row 8 - Monterey Cypress**

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### **Rationale for Removal**

1. It is noted that Monterey Cypress (*Hesperocyparis acrocarpa*) are listed as environmental weeds in Victoria by DELWP and as such we recommend that these be removed as part of the development process.
  2. As noted by ENSPEC, 'It is considered highly likely that these trees are, or will be, affected by Cypress canker and as such, will continue to decline in condition and value'. Considerable sections of the row are already of poor quality and in various levels of decline.
  3. Typically, when a row of Monterey Cypress have part of the row removed, the side of the remnant tree that is adjacent to the removed trees has a large section of 'dead' wood and little to no foliage. This 'face' of the tree typically takes a significant time to regenerate and in many instances never fully does. There are numerous displays of this in the immediate neighbourhood neighbourhood, photos 4 & 5 depict examples of these.
  4. The location of these trees are directly adjacent to Burnside Road and the existing road shoulder is between 9 and 10m of the trees. Accordingly any works to the road shoulder are already within the tree protection zone of these trees and any works on the existing road or on the east side of the road are likely to have significant impacts on the trees, potentially effecting their retention. Accordingly, they would likely need to be retained in a significantly increased road reserve to achieve their practical retention.
  5. The connectivity of roads, paths, drainage corridors and other services are considered likely to require multiple crossings of the section of trees proposed to be retained. As noted above, these will result in multiple faces of the retained trees that are 'dead' and unsightly.
- It is considered that these are all poor planning, aesthetic and environmental outcomes. Accordingly, it is recommended that these trees not be listed for retention.

## **6. Monterey Cypress**

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### **Rationale for removal**

As above.

## **7. Group 981, 982 and 983 - 2 x weeping willow, 1 x sugar gum**

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### **Rationale for removal**

1. It is noted that the Weeping Willow (*Salix babylonica*) is listed as a noxious weed and is restricted in Victoria under the catchment and land protection act and the Sugar Gum is listed as an environmental weed.
  2. It is considered that this location is extremely likely to have considerable earthworks in the vicinity as part of development, with filling of the existing dam being required and the likely location of a waterway and stormwater treatment nodes (wetlands and detention basin) being in the immediate location and that these are likely to have reasonably significant areas of excavation and fill areas within the development immediately adjacent to them. Working around these three trees is considered likely to result in considerably constrained designs and efficiency in their footprints and capital costs.
- It is strongly recommended that these trees not be listed for retention.

# APPENDIX 4

## EMAIL FROM BRYAN SCOTT RE: USES IN TRANSMISSION EASEMENT

**From:** Bryan Scott bryan.scott@ausnetservices.com.au  
**Subject:** RE: Bannockburn South East - Transmission Easement Discussion  
**Date:** 7 June 2023 at 4:01 pm

BS

**To:** Samantha Ramsey samantha@ramseypg.com.au  
**Cc:** Morris Edwards (VPA) morris.edwards@vpa.vic.gov.au, Lachlan Buck (VPA) Lachlan.buck@vpa.vic.gov.au, PJ Pusello (VPA) PJ.Pusello@vpa.vic.gov.au, Patricia Ocampo (VPA) Patricia.Ocampo@vpa.vic.gov.au, Laura Murphy laura.murphy@gplains.vic.gov.au

Samantha,  
Additional comments have been added below in red for clarity.  
Apologies for the delay in responding

Regards,

**Bryan Scott**  
Property Manager

**AusNet**

Level 31, 2 Southbank Boulevard  
Southbank Victoria 3006 Australia  
Locked Bag No 14051 MCMC, Melbourne, Vic, 8001  
Mobile 0413 734 370  
[Bryan.Scott@ausnetservices.com.au](mailto:Bryan.Scott@ausnetservices.com.au)  
[www.ausnetservices.com.au](http://www.ausnetservices.com.au)

---

**From:** Samantha Ramsey <samantha@ramseypg.com.au>  
**Sent:** Wednesday, 7 June 2023 3:03 PM  
**To:** Bryan Scott <bryan.scott@ausnetservices.com.au>  
**Cc:** Morris Edwards (VPA) <morris.edwards@vpa.vic.gov.au>; Lachlan Buck (VPA) <Lachlan.buck@vpa.vic.gov.au>; PJ Pusello (VPA) <PJ.Pusello@vpa.vic.gov.au>; Patricia Ocampo (VPA) <Patricia.Ocampo@vpa.vic.gov.au>; Laura Murphy <laura.murphy@gplains.vic.gov.au>  
**Subject:** Re: Bannockburn South East - Transmission Easement Discussion

**This message is from an external sender**

This message originated from outside AusNet. Do not click on links or open attachments unless you recognise the sender and know the content is safe.

Hi Bryan,

Just following up on my email below, would you mind confirming that Ausnet is comfortable with the concept of the below possibilities for uses in the transmission easement? Subject, obviously, to the Ausnet Guidelines.

Thanks so much.

Cheers,  
Sam

**REG**

RAMSEY PROPERTY GROUP.

**SAMANTHA RAMSEY / DIRECTOR.**

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Offices in South Yarra & Queenscliff

On 19 May 2023, at 2:10 pm, Samantha Ramsey <[samantha@ramseypg.com.au](mailto:samantha@ramseypg.com.au)> wrote:

Hi Bryan,

Thank you so much for your time last week to discuss the Bannockburn PSP and interplay with the Ausnet Easement. I really appreciate your advice. I have attached a copy of our presentation for your information. Further to our meeting, below is a summary of my understanding of the outcomes and requirements of Ausnet within the power line easement for various uses.

As discussed, we are looking to incorporate the following uses within the easement:

### **1. Residential**

We intend to incorporate larger residential lots within the easement where the house is located outside of the easement and the rest of the land would be located within the easement (as per presentation).

Ausnet requirements

Ausnet does not have an objection to this use, however requests that those lots have double frontage to allow for ancillary things such as a small shed. **No structure will be permitted within the easement (this includes sheds, carports etc.)** Further Ausnets ~~preference~~ **requirement is** ~~would be~~ timber fencing (or non-conducting fencing), alternatively, the fencing needs to be earthed and at multiple points along the fence (**as approved by AusNet**). We will erect the fencing, just as we do with our low density residential lots. These requirements can be managed through the permit process as conditions on the permit.

### **2. Commercial / light industrial**

We intend to have commercial 2/light industrial immediately north of the easement with car parking within the easement for these shops (again as per presentation). For example, gym / fitness studio, creative industries, office space, man caves, homewares, e-commerce, market gardens, etc. **(parking will be limited to do small domestic vehicle such as sedans and utilise not exceeding 3m in height and cannot be used for storage of vehicles)**

Ausnet Requirements

Ausnet does not have an objection to this use, however, there will need to be certain distances and set backs from the actual tower – **minimum 20m m plus appropriate traffic management structures (bollards etc.)**. Also, the businesses would need to be the type of businesses that don't require larger trucks. Again, this could be managed through the permit process via a 173 Agreement between the owner and the Council. We have similar agreements in other developments for

the owner and the Council. we have similar agreements in other developments for bushfire risk (such as mandated water tanks, etc).

### 3. Drainage

There may be an opportunity to put drainage within the easement – **Drainage systems must be designed so as not to increase water flow onto or across the easement or result in water pooling anywhere near the towers.**

#### Ausnet Requirements

Ausnet does not have an objection to this use, however, the drainage basin / water body ~~should~~ **must** not span the full width of the easement, as Ausnet need to be able to access / traverse the easement. There are also certain buffers from the water body and the towers **(30m from the base of the tower).**

### 4. Active Transport Link

Should the Arterial Road be located immediately south of the transmission easement, with the active transport links (pedestrian and cycling) being within the transmission easement.

#### Ausnet Requirements

Ausnet does not have an objection to the active transport (pedestrian and cycling) to be within the transmission easement **(no alteration to the existing ground level without AusNet approval)**, however, the actual Arterial Road would need to remain outside of the easement. **Correct**

### 5. Activity Centre

Should the activity centre be located immediately south / adjacent to the arterial road and almost immediately south of the transmission easement, Ausnet would not have an objection to this. **Correct**

Look forward to your thoughts.

Kind regards,  
Sam

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