



STP REF: 25059

14 June 2025

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## RE: SUBMISSION TO DRAFT BANNOCKBURN SOUTH EAST PSP

Dear Noor,

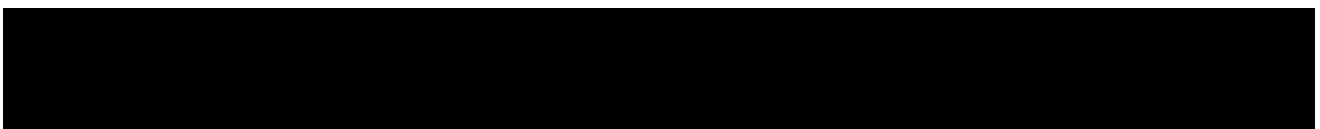
I act on behalf of [REDACTED] with respect to this submission to the Draft Bannockburn South East Precinct Structure Plan. [REDACTED] is the registered landowner of the land at [REDACTED].

The area of primary interest to this submission include the abovementioned property, which are located within the PSP is the application of the 500m Hatchery Buffer

### Limitations

This submission is informed by a review of the aforementioned properties, title particulars, the Golden Plains Planning Scheme, the Draft Bannockburn South East PSP, Odour Impact and Risk Assessment (Peter J Ramsay & Associates), the Draft Bannockburn South East PSP - Development Contributions Plan, Background Reporting and associated studies.

We request that this submission be received in relation to the Draft Bannockburn South East PSP.



## Key matters

### Hatchery Buffer and the potential impacts arising from odour

We acknowledge that the proposed extension to the township is the agent of change. A preliminary separation distance of 500m has been outlined in the PSP until such as time as the hatchery and breeder use's cease OR, critically, until "it can be demonstrated that impacts of industry can be appropriately mitigated." We further note that it is only the hatchery which is within 500m of the subject land and not the more odour offensive breeder farm which is located approximately 420m south of the precinct boundary and approximately 535m south of the subject land.

A level 3 odour assessment was undertaken (Peter J Ramsay & Associates) on behalf of Netherby Nominees and Ramsey Property Group. The assessment was provided to our client to aid in this submission. Based on the results of the odour assessment, it was concluded that the potential odour impacts from the Turosi Foods site on the land beyond the southern bounds of the precinct was considered "acceptable". Meaning that, the development of the land within the aforementioned buffer zone is acceptable for residential development and meets the relevant EPA guidelines.

We note that there were no obvious odours detected during empirical testing. Beyond that, modelling suggests that the first detectable odours at 2.0 OU (subtle odours) are not expected for the majority of the subject land at the 99.5<sup>th</sup> percentile event. Meaning that the risk occurrence rate for merely the first detectable odours is modelled as exceedingly rare.

We acknowledge the need for the retention of the 399m buffer to the neighbouring more offensive breeder farm, however in light of the empirical odour assessment, we submit that the retention of the 500m hatchery buffer is not necessary. It is noted in the draft animal production separation distance requirements that 'hatcheries produce very little odour with minimal wastes that are generally removed offsite'. In addition, EPA stated in its advice to VPA that '*The hatchery should have a smaller impact on odour compared with the breeder farms and typically are not a significant odour source*'. The notional buffer imposed is

seemingly significantly larger than the comparatively higher impact poultry operations and would serve to redundantly protect land against non-detectable odour emissions.

With respect to Objective 4 and implementation tools R6 and G5 we submit that there is a need for redrafting and further consideration in light of the empirical analysis presented.

The VPA may consider the following with respect to Objective 4:

- Retention of a safe buffer distance to sensitive land uses from the breeder property only (further south of the hatchery).
- Removal of buffer distance requirements from the hatchery.
- Ongoing monitoring of sensitive land use considerations should the breeder use cease in the future.

The VPA may consider the following with respect to R6:

- The need to include the hatchery in R6 and shift primary considerations to the breeder farm only.

The VPA may consider the following with respect to G5:

- The need to include the hatchery in G5 and shift primary considerations to the breeder farm only.

## **Structure and Form of the Proposed PSP Generally**

Generally we commend the draft PSP and its consideration of:

- Aboriginal Cultural Heritage
- Protection of the waterway and its intrinsic ecological values, and
- Delivery of development infrastructure
- Pedestrian connectivity within the PSP area to areas of high amenity and open space value such as the Bruce Creek corridor

## Conclusion

On behalf of the landowner, we commend the VPA for their ongoing investment in planning for the Bannockburn South East Precinct.

This submission contains supportive comments on the recommendations of the Draft PSP as it pertains to the subject land.

More narrowly, we commend and support any amendments to the final PSP that seeks to recommend or action the removal of buffer distances from the hatchery.

We invite further consultation with the VPA and it's project partners on the key matters identified within this submission and thank you for the opportunity for input.

If you have any queries in relation to the content of this submission, please don't hesitate to contact me at [REDACTED]

We look forward to your correspondence.

[REDACTED]