

Sustainable Growth in Inverleigh 01-10-2019

I am writing to you to express my concerns regarding the currently under public review for endorsement, Amendment C87 to the Golden Plains Planning Scheme.

I am of the strong belief that the proposed amendment does not provide enough protection to ensure the Inverleigh town and surrounding areas maintain their unique attributes that makes it the desirable place to live and visit it has been and is today.

In particular but not limited to, the proposal to reduce the minimum block size to a blanket of 0.4 hectare is most concerning.

The proposed density of future developments has the potential to negatively impact on the environment, flora and fauna of the areas identified for future development and beyond. These identified future development areas will directly impact on the natural waterways, being; the Leigh River, Native Hut Creek and ultimately downstream to the Barwon River, as these water ways are either directly adjacent to the sites identified or directly downstream of the sites.

The Corangamite Waterway Strategy (CWS) 2014-2022 (Corangamite Catchment Authority being the governing authority responsible for the management of these waterways) details the current condition of the Barwon catchment basin (the catchment area that the proposed above-mentioned changes will impact) as being the worse of the two worst catchments of the four basins they control. It is interesting that the other basin of concern is the Moorabool Basin which also travels through the Golden Plains Shire (GPS) and is also impacted by significant population growth. The Barwon Basin (including Leigh Zone and the Mid Barwon Zone) was part of the statewide Index of Stream Condition (ISC) program that is an integrated snapshot of the condition of rivers, creeks and estuaries and was undertaken in 2010 which forms the basis for the condition reports that are referenced below and taken from the CWS. The investigations revealed that stream conditions across the Corangamite region varied, with the heavily forested Otway Coast basin in good and excellent condition, but with the Barwon basin having 17% at a very poor condition, 41% at poor condition, 37% at moderate condition, 4% at good condition 0% excellent and 1% insufficient. This compares to the average across

the 4 basins under CCA management; 13% Very poor, 23% poor, 45% moderate, 7% good, 11% excellent and 1% insufficient data.

The CWS describes the Leigh and Barwon Rivers and their tributaries as *“High Value and Priority Waterways”* with values of *“Significant Ecological Vegetation Classes, Significant bird species and important bird habitat, provides support for biodiversity including many species of fish and birds, remnant native vegetation and flagship species including Platypus and recreation, including picnicking, sightseeing, walking tracks and non-motor boating.”*

Also recognising the Key threats to the waterways as *“Altered flow rates, eroded banks, damaged riparian vegetation and reduced water quality through sedimentation and effluent contamination”*.

So, significant indicators that our local waterways systems are already under pressure without the additional potential impacts that these developments will bring.

The following factors will impact:

- 1) **Storm water runoff**; dramatically altered by the changes to the land by buildings, roads and other infrastructure and due to the altered natural flows of the landscape. Volumes and flow rates will be dramatically altered by the fact that the stormwater produced from the development sites will be concentrated to specific drainage systems not natural to the waterways (rivers and creeks), that will receive the stormwater drainage outputs.

Increase in pollutants and sediments within the stormwater due to population growth (human involvement) and what that brings with it (chemicals, plastic waste, animal waste and the like). This is also likely to be exacerbated by the change in weather events attributed to climate change. Forecasts from Bureau of Meteorology predict more violent weather events in the future where storms will be more intense in both their delivery and volume. In turn this will also impact on the ability of the waterways to cope with the stormwater delivered into the areas of development and ultimately the streams in larger volumes than ever received, now proposed to be directed into built systems that will change the stream shape and flows forever.

2) Leaching of effluent from wastewater systems; the septic wastewater management is governed by the EPA. But all waste water management systems are assessed and approved on an individual application, site by site, in conjunction with the Building permit application and managed by the Council Health surveyor. The Health Surveyor checks the proposed system against the EPA guidelines and Council's wastewater management policy. What's not accounted for in these systems performance is the waste sediment residue that remains in the ground once the moisture is evaporated. The residue made up of nutrients and salts as a result of the use of household chemicals, like washing powder and detergents.

Wastewater dispersal must be irrigated to not exceed the optimum water and nutrient requirements of the vegetation within the premises. Nutrient and organic uptake application rates are taken from EPA's Publication 168, Guidelines for Wastewater Irrigation, April 1991.

The guidelines and criteria followed for the design of proposed wastewater effluent dispersal area are based on EPA's Code of Practice for Onsite Wastewater Management, Publication 891.4.

The purpose of which is to protect public health and the environment. To this end it is a requirement of State Environment Protection Policy (Waters of Victoria) 2003, that wastewater performance minimum and maximum daily volumes that can be effectively treated on the property.

The risks that are associated with wastewater management is that while the system/s may be designed to perform at the required level to meet the needs of the site and anticipated use levels, the actual installed system may not perform at the designed performance levels, or not be maintained to ensure ongoing required performance levels. These systems require yearly and 3-5 yearly maintenance regimes to ensure ongoing performance levels are maintained. This maintenance requirement is not a mandatory requirement. There for property owners are not aware of this maintenance requirement, so not something that would be undertaken by the householder.

The reduced performance outcomes affect the system's ability to cope with:

- large shock loads or surge flows
- toxic substances like bleach, oil, paint thinners etc.

- being switched off for 1 week, 1 - 3 months or no inflow for 1 week or more.

The risk of effluent leaching to waterways is then multiplied by the size of the developments and density of these developments and is often only realised when it's developed, completely built out some years after and the developer long gone, along with his bags of money and no accountability.

In summary; I am not opposed to Inverleigh's development into the future, but growth of the population needs to be sustainable for both the environment and amenity of the area, that all future development takes into account the uniqueness of our town and enhances it and the surrounding district.

Council needs to demonstrate within the Inverleigh Town Structure Plan (ITSP) Amendment C87 GPLA, that developers will be made accountable to meet all requirements associated with environmental impacts of development of land within the GPS jurisdiction.

Developers need to prove that they have put appropriate protections in place to ensure;

- That the natural environment is total safeguarded by appropriate mitigation measures addressing all hazards to waterways, natural land, flora and fauna. This critical assessment and mitigation plan should be mandatory and referenced within Amendment C87 GPLA.
- That individual block sizes are large enough to cope with waste water impacts of the total development holistically, with no potential to have a detrimental impact on waterways both locally and downstream. I suggest a minimum lot size of 1 hectare be adopted within the Amendment C87 GPLA. This is currently and traditionally the minimum size of allotments in this zoning in and around Inverleigh and will maintain a consistent balanced approach to growth.
- That the infrastructure that is delivered as part of the built development; sealed roads, pedestrian paths, stormwater drainage systems, etc, must meet a set standard of design and built quality, to a minimum useful life of 50 years. This can be achieved by using the Infrastructure Design Manual, now adopted by Golden Plains Shire (2016), as the minimum standard for infrastructure design. This standard should now be referenced within Amendment C87 GPLA.

- That land release is restricted to ensure the designated development is providing building opportunities appropriate to Inverleigh's stated moderate growth goal of 27 homes per year. This should be controlled by staged releases of land over this period and should also be referenced within Amendment C87 GPLA.