

11 August 2019
1 McLaren Court
Waurm Ponds Vic 3216

Ms Sarah Carlisle
Panel Chair
Planning Panels Victoria
GPO Box 2394
Melbourne Vic 3001
planning.panels@delwp.vic.gov.au

Dear Chair,

**Greater Geelong Planning Scheme Amendment C372 and
Planning Permit Applications 662/2017 and 663/2017: 35 and 69-93 Hams Road and Barwon
Water Reserve, Waurm Ponds**

I wish to table this Expert Witness Report in respect of the abovementioned Amendment and Applications.

I wish to confirm that I lodged a timely representation submission during the advertised period for the application when advertised by the City of Greater Geelong on 1 May 2019, which is the Appendix to this statement.

My place of residence is:

- 1 McLaren Court, Waurm Ponds Vic 3216

My current position is:

- Foundation Professor of Planning & Landscape Architecture at Deakin University

My academic qualifications are:

- BA, GradDipUrbPlann, GradDipHeritPlan&Mgt *FIT*, MUP(Prelim), MLArch *Melb*, CertHistPres, MA(City&RegPlan), PhD *Penn*

My professional qualifications are:

- FAILA, MPIA, MICOMOS

I wish to declare that: *'I have made all the inquiries that I believe are desirable and appropriate and no matters of significance which I regard as relevant have to my knowledge been withheld from the Panel.'*

The following/attached document is the substance of my expert witness statement and documentation, of which I propose to speak to the essence of this information.

Yours sincerely,



Dr David Jones

In tabling this Expert Witness Statement I have decided to keep my points of argument clear and succinct rather than entertaining extensive argument.

1. Overall

While I respect the need and potential the subject land, our family preferences for the future use and development of the land should be:

1. First, as a mixed passive and active open space reserve that celebrates the natural wildlife and water qualities of the subject land, respects its Wadawurrung and colonial cultural heritage, especially in its role in providing a biodiversity and recreational linear park/link from the Armstrong Creek corridor to the Waurin Ponds landscape. This is an important recommendation because there is major lack of recreational venues in this sector of the Waurin Ponds suburb, and especially within a normal 10 minutes walking distance. The nearest passive and or active parks to this locality is in fact along the Waurin Ponds Creek corridor to the north and along the new Armstrong Creek streamline corridor across Baanip Boulevard, both in excess of 1km away.

2. Second, if the first option is not possible, for the land to be developed at a comparable allotment density and covenant standards as currently applicable in the adjacent and adjoining Grange Park Estate. To benchmark off, to compare this tract of land, and to claim that this land is “*a logical and orderly extension of the Armstrong Creek West Precinct*” (Taylors 2018: 9), fails to recognise the integrity of different residential suburbs and landscapes of which one clear intent in the Henshall Hansen (1994) vision for Armstrong Creek was the need to spatially, physically and aesthetically ensure a separation of distance and character to the existing Waurin Ponds and Grovedale suburb landscapes.

In Tabling this Expert Witness Statement I would like to focus upon:

2. Cultural Heritage:

Overall near 95% of the subject land falls within a designated “Area of [Aboriginal] Cultural Heritage Sensitivity”.

Areas of cultural heritage sensitivity include land within 50 metres of registered cultural heritage places, land within 200 metres of waterways and other locations defined in the Regulations. A Cultural Heritage Management Plan (CHMP) is a written report, containing an assessment of the potential impact of the proposed activity on Aboriginal cultural heritage. It is supposed to be

It outlines measures to be taken before, during and after an activity in order to manage and protect Aboriginal cultural heritage in the activity area. A CHMP is mandatory when all or part of the activity is in an area of cultural heritage sensitivity. But, a CHMP does not authorise archaeological excavations as part of the investigations to draft a CHMP.

The applicant has tabled the *35 Hams Road and 151-229 Anglesea Road, Waurin Ponds – Proposed Residential Subdivision: Cultural Heritage Management Plan: Desktop, Standard and Complex Assessments* by Young and Barker (2018) [CHMP]

Having regard to these facts, I would argue that:

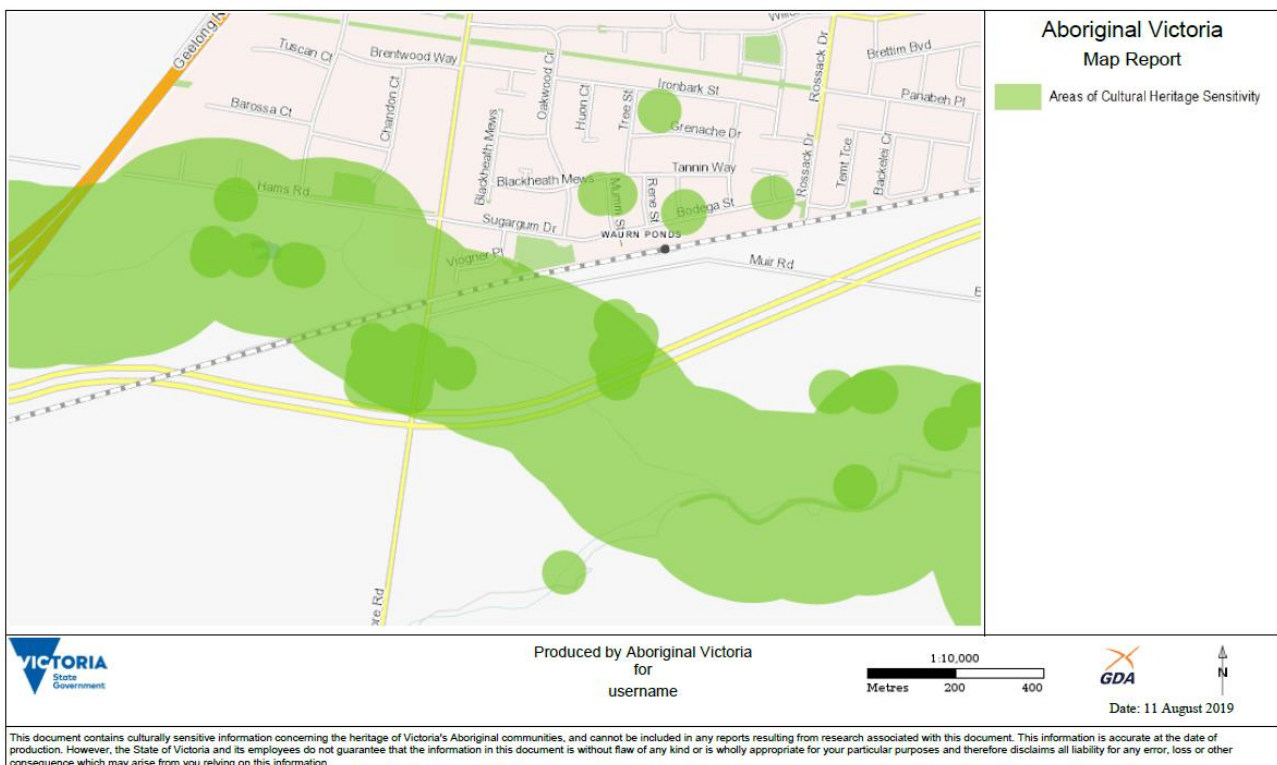
a. The validity of the Young & Barker (2018) report is questionable because it has involved archaeological excavations within a designated “Area of Aboriginal Cultural Heritage Sensitivity” for which no Cultural Heritage Permit was obtained under s.36 of the *Aboriginal Heritage Act 2006* from

the Wadawurrung (Wathaurung Aboriginal Corporation). I would ask that the Panel set aside this CHMP as evidence because of this non-compliance.

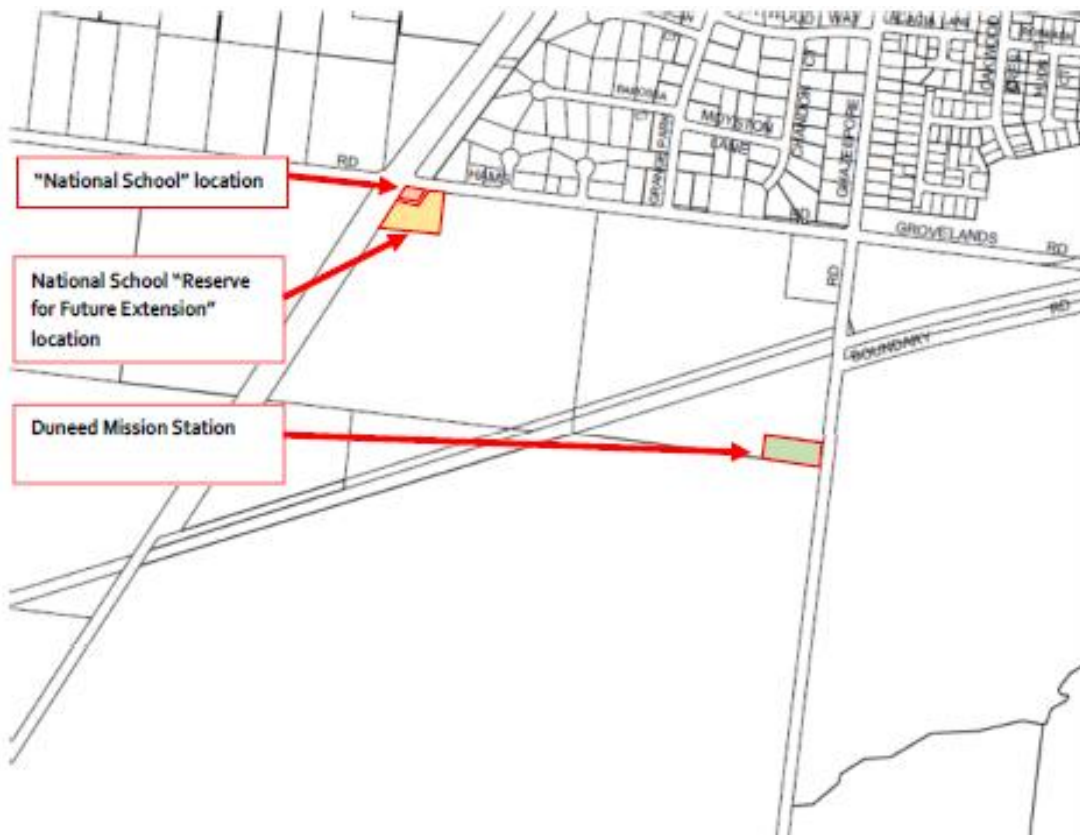
I would ask, however, that the Corporation's recommendations be adopted in full.

2.2 The veracity of the Cultural Heritage Report is questionable because it fails to disclose to the public, to the Wadawurrung (Wathaurung Aboriginal Corporation) and thus to the City of Greater Geelong, the complete cultural heritage values of significance of this subject land, wherein

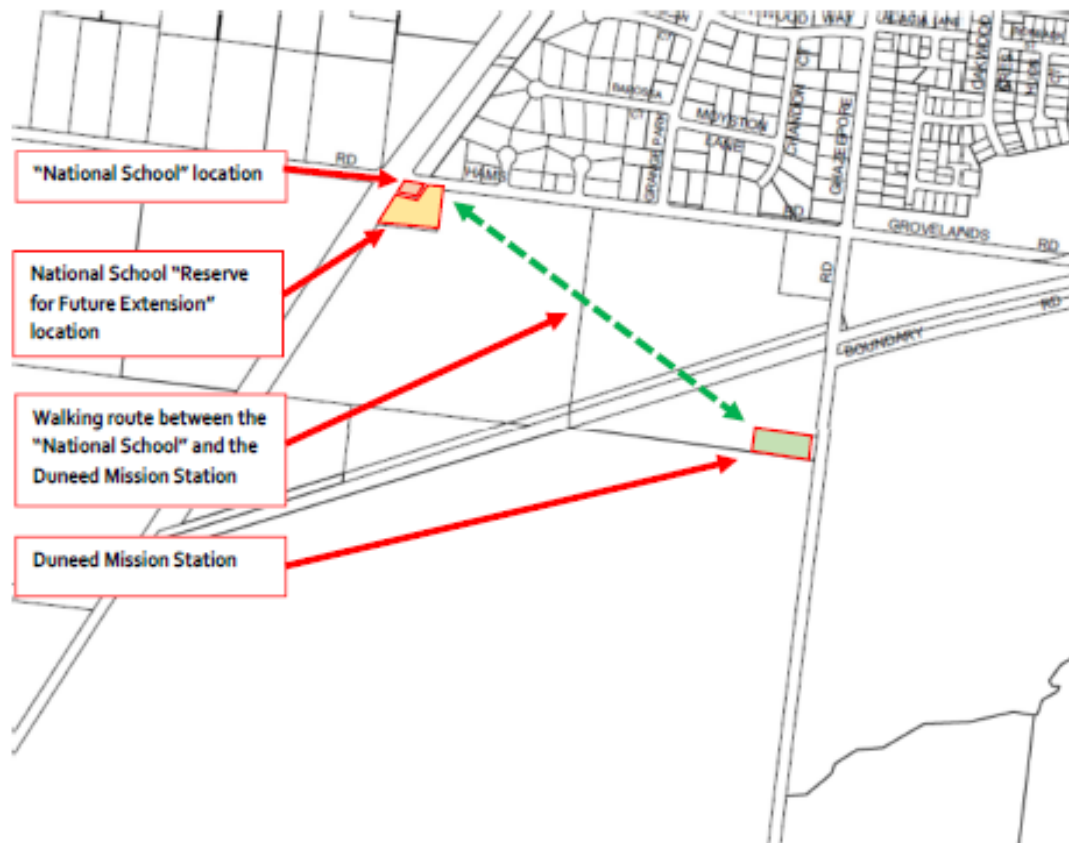
- 2.2.1 obscures mention and discussion of the first National School funded in Victoria that was erected on the south-eastern corner of Anglesea Road and Hams Road, that was attended by children in Geelong as well as Wadawurrung children. The "school" is mentioned only by the on pages 5, 55 and 56, and raises major questions about the veracity and transparency of this report.
- 2.2.2 has no mention of the Duneed Mission Station property, located on Ghazeepoore Road, immediately adjacent to the subject land, that was occupied by members of the Wadawurrung community. The absence of mentioning this place, Geelong's equivalent to Coranderk Mission Station, raises major questions about the veracity and transparency of this report.



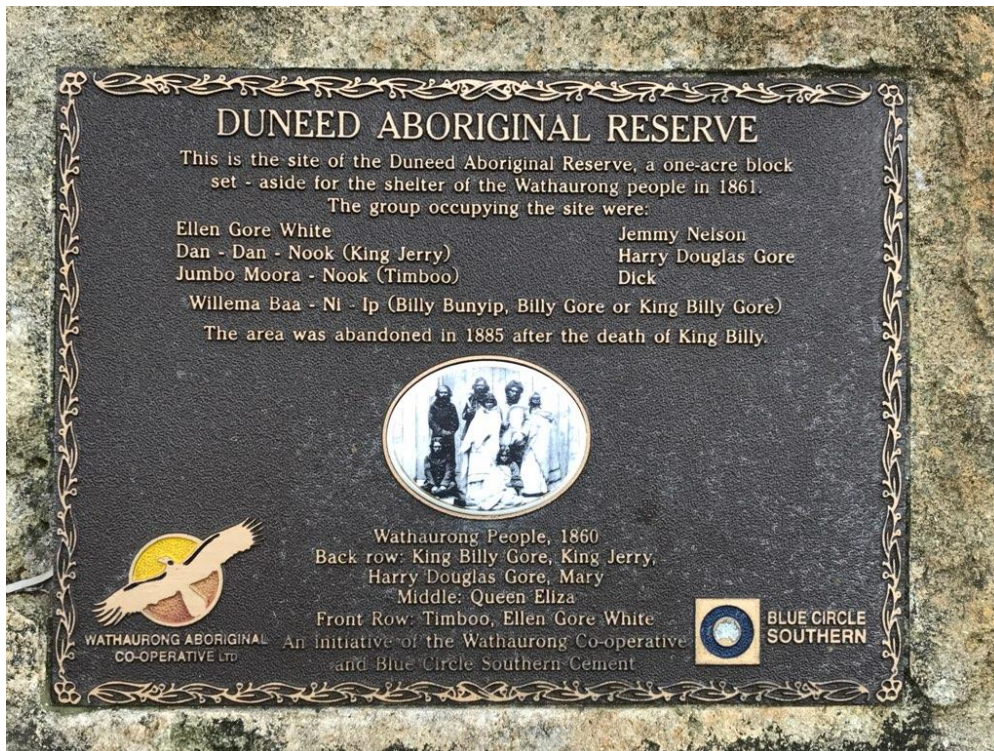
"Areas of Cultural Sensitivity" map for the subject property



Locations of "National School" and Duneed Mission map on the subject property



Conceptual location of walking trail between the "National School" and Duneed Mission map across the subject property



Duneed Mission Plaque

3. Traffic

I am concerned that the traffic modelling for this proposal is flawed being based upon:

- traffic movement statistical data that does not reflect the major increase in Ghazeepore Road movements accessing the Waurn Ponds Station car park (opened on 12 October 2014) that has occurred in the last two years especially as a consequence of roundabout changes to the Barwon Head – Mount Duneed connector road in the last two years, and the maturation of traffic movements on Baanip Boulevard (opened 3 June 2015) with the influx of new residents into the Armstrong Creek West suburb in the last two years who are clearly accessing the Waurn Ponds Railway Station for work transit purposes;
- assuming that consultants have concluded, due to the above flawed data, that the existing base traffic flows at the Hams Road-Ghazeepore Road-Sugargum Drive intersection is on average 120 movements south and 260 movements north daily [Traffix 2018: 4, and Attachment A] (**being 380 daily movements**) (being 43,800 south and 94,900 north yearly), and takes an assumption of a 30% increase in traffic movements [Traffix 2018: 11] resulting in an on average 156 movements south and 338 movements north (**being 494 daily movements**) (being 56,940 south and 123,370 north yearly);
- uses traffic movement statistical data gathered on 25-26 October 2016 during a non-teaching week at Deakin University's Waurn Ponds Campus (Deakin 2016);
- uses daily traffic movements for Geelong's bus system prior to the current changes to frequency and timetabling that came into effect in 2018;
- uses traffic movement statistic projections that will occur with the pending announced rail duplication and car park expansion and upgrade to the Waurn Ponds railway station; and

- uses traffic movement statistic projections that fail to factor in increased flows that will occur as a consequence of the construction of the approved Armstrong Creek West Regional Park on Ghazeepore Road.

Such data and assumptions contradict conclusions and recommendations drawn by GTA Consultants in 2011 when authoring the *Armstrong Creek West Precinct Transport Impact Assessment*. GTA Consultants state that ‘Anticipated Post-Development AM Peak Hour turning Movements’ at Armstrong Creek West Precinct post-development stage entering Ghazeepore Road from Baanip Boulevard would be **648 daily traffic movements**, and ‘Anticipated Post-Development PM Peak Hour turning Movements’ exiting Ghazeepore Road into Baanip Boulevard would be **474 daily traffic movements** (GTA Consultants 2011: 21, 22).

Such data and assumptions contradict conclusions drawn by Council’s own General Manager of Transport on 14 April 2015 when reviewing ‘*Transport Infrastructure in Waurm Ponds*’ who stated that “*Ghazeepore Road starts at the Princes Highway and continues through to Mt Duneed Road in a north-south direction.*”

At present (in 2015) this road carries close to 4,000 vehicles per day. As per the Municipal Road Management Plan, it is identified to carry traffic volumes up to 10,000 vehicles per day” and therefore that “key intersections along Ghazeepore Road such at Hams Road, Monterey Drive/Sugargum Drive and Baanip Boulevard all need to be reviewed. Halls Road/Sugargum Drive and Baanip boulevard intersections are identified for traffic signals” [CoGG Ordinary Meeting Agenda, 14 April 2015: 68].

Such data and assumptions contradict data stated by Council’s own Traffic Engineer on 7 February 2019 on record to the Development Hearings Panel Meeting No 579 that “*The northern section of Ghazeepore Rd has an average daily traffic volume of between 6000 and 7000 vehicles. The road classification is that of a Category 4 Higher Order Collector Road, and is a council-managed road. The volumes have been steadily increasing over the years, and will continue to do so in the foreseeable future*” [CoGG Development Hearings Panel Meeting No 579, 7 February 2019: 125]. It is thus infeasible to assume that 5,880 daily movements disappear between Burgundy Drive and Sugargum Drive when travelling along Ghazeepore Road, and thus Council’s own Traffic Engineer is using traffic movement data figures that dramatically contradict the data in the Traffix report.

I have concerns about the veracity of the traffic count data undertaken on 25-26 October 2016 (Traffix 2018: 3) because it occurred during a non-teaching week at Deakin University’s Waurm Ponds Campus (Deakin 2016) in 2016 and does not reflect true and normal student and staff car, bus and rail use of Ghazeepore Road and Waurm Ponds Railway Station.

The Traffix projections fail to understand Deakin University’s increasing tertiary student projection figures Waurm Ponds Campus, that currently hosts approximately 10,000 student enrolments. This campus is expected to grow to approximately 15,000 over the next 3-4 years due to additional classes occurring, including medical classes now commencing with the newly completed stage 1 Epworth Hospital complex, and research facilities being constructed on the campus.

The Traffix projections fail to understand that Deakin operates a three trimester system rather than a two semester system. The three trimester system is not the conventional university summer school arrangement that typically occurs in Melbourne, but rather fully-accredited assessable units integral to a undergraduate or postgraduate degree.

Thus, 2017-2019 myiki data (below) from Waurm Ponds Railway Stations demonstrates constant 3 trimester use rather than normal university 2 semester use of this facility, and thus the intersection.

Deakin students access the Waurn Ponds Campus via private car, foot, inter-campus bus, and public bus. The latter bus uses the Geelong bus service infrastructure, and all students wishing to catch the train along the Waurn Ponds-Geelong-Melbourne (or Waurn Ponds-Warrnambool) rail line take the bus from the Waurn Ponds Campus to the Waurn Ponds Station.

The Traffix projections fail to take into consideration the proposed Armstrong West Regional Active Open Space Park to be constructed on the south-east corner of Ghazeporee Road and Baanip Boulevard, as contained in the *Armstrong Creek West Precinct Structure Plan (2012)*, approved by Council. (See figures below) This designated 'Regional Park' will service both Armstrong West and Waurn Ponds residents, thus regional residents, and not simply Armstrong Creek West Precinct residents. The Park, involving 9 hockey/soccer fields and 18 tennis courts will host approximately 400 car parking spaces, with primary access onto Ghazepore Road. This facility, given the Waurn Ponds users, will escalate vehicle movement numbers on Ghazepore Road especially after school and on the weekends.

- Source:

GTA Consultants (2011), *Armstrong Creek West Precinct Transport Impact Assessment*.

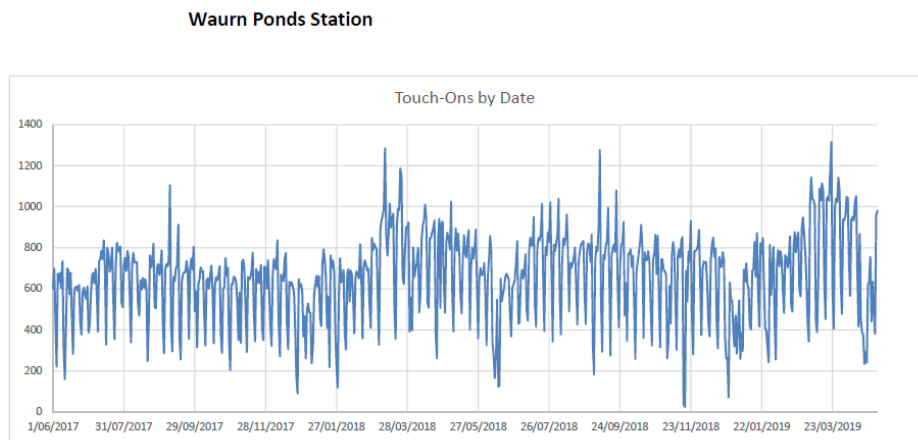
CoGG (2015), *Transport Infrastructure in Waurn Ponds* in CoGG Ordinary Meeting Agenda, 14 April 2015.

CoGG (2019), Development Hearings Panel Meeting No 579, 7 February 2019.

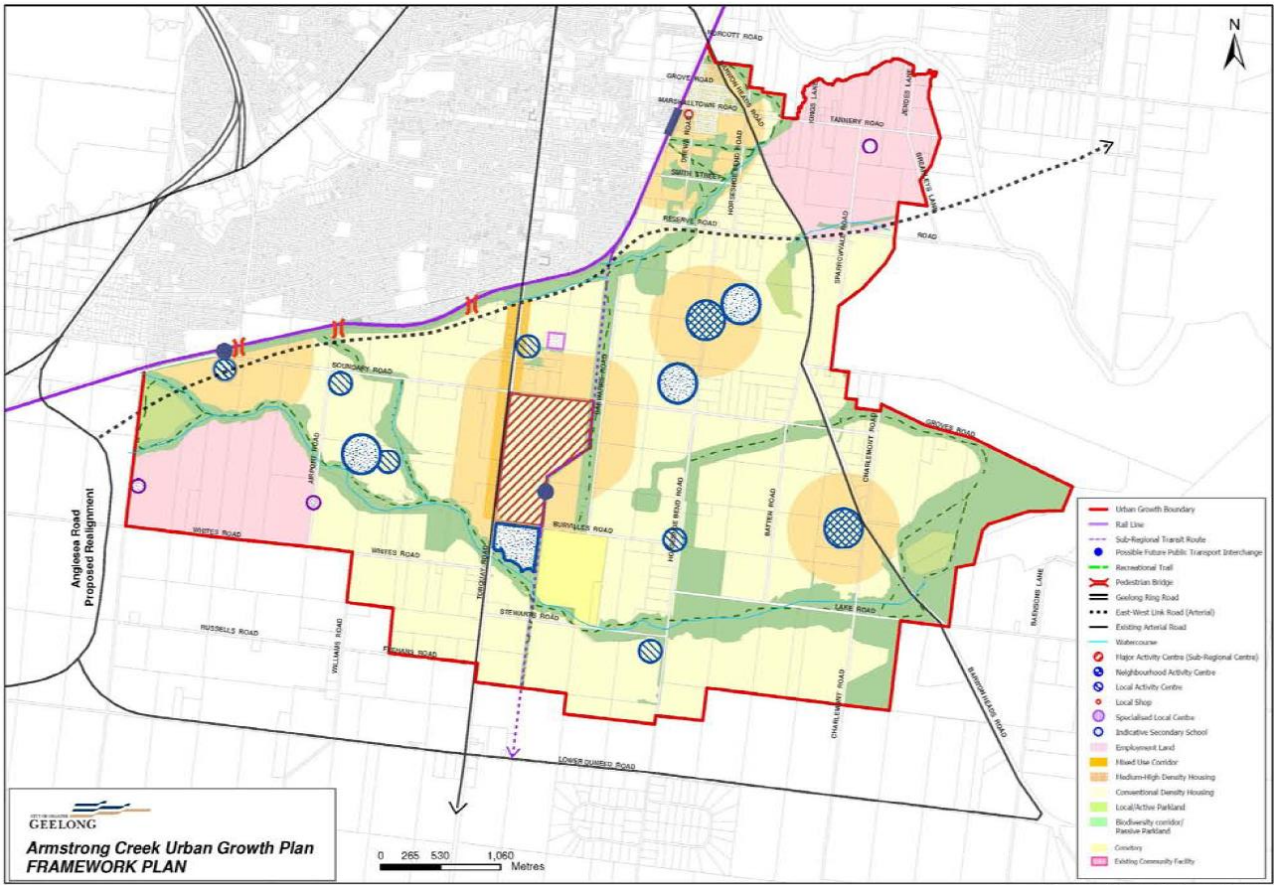
Deakin University (2016), *Academic Calendar*, https://www.deakin.edu.au/_data/assets/pdf_file/0009/677439/2016-Deakin-University-Academic-Calendar.pdf.

Traffix Group (2018) *Traffic Engineering Assessment: Proposed Rezoning and Residential Subdivision at 35 & 69-93 Hams Road, Waurn Ponds*. Glen Iris: Traffix Group.

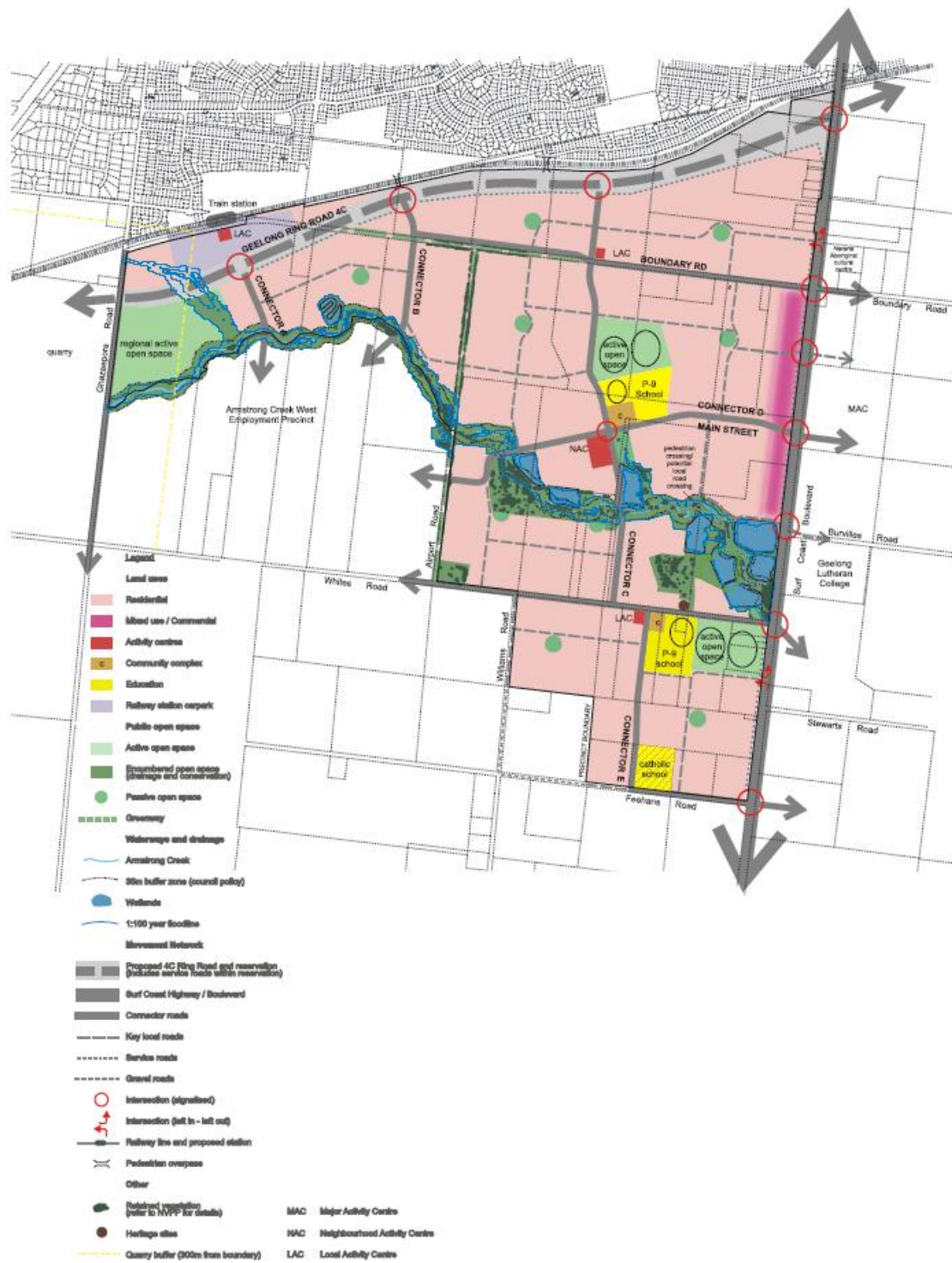
Month	Average Weekday Touch-Ons
June-2017	607
July-2017	777
August-2017	754
September-2017	776
October-2017	712
November-2017	706
December-2017	643
January-2018	614
February-2018	753
March-2018	980
April-2018	810
May-2018	794
June-2018	607
July-2018	777
August-2018	754
September-2018	776
October-2018	712
November-2018	706
December-2018	643
January-2019	614
February-2019	753
March-2019	980
April-2019	810



Waurn Ponds Station miki data 2017-2019



Extract of the *Armstrong Creek West Precinct Structure Plan (2012)*,



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Extract of the *Armstrong Creek West Precinct Structure Plan (2012)*,

4. Hams Road Width and Vegetation

4.1 Road Width: I would argue that, if this subdivision proposal proceeds, that the Hams Road bitumen surface west of the Champagne Court intersection be reduced from the proposed 20.12m bitumen width (Taylors 2018: 12) to a bitumen width of 16.0m and suitable road design measures be applied to reflect this change of width and entry into a different speed zone.

There appears no economic and traffic logic in constructing a 20.12m bitumen surface for the entire length of Hams Road if the western portion will never host the same level of traffic movements and is also a 'dead end' road.

This recommended reduction of bitumen surface will additionally ensure the conservation of the extant 'Grassy Woodland' mature native vegetation of "Drooping Sheoak (*Allocasuarina verticillata*), Hedge Wattle (*Acacia paradoxa*) ... [, amidst a lower storey of] Nodding Saltbush (*Einada nutans*) Wallaby-grass and Spear Grasses" on Council's Hams Road reserve (Taylors 2018: 12, 14) west of the Champagne Court intersection.

4.2 Road Reserve Vegetation: I am seriously concerned about the request by the applicant to remove extant 'Grassy Woodland' mature native vegetation of "Drooping Sheoak (*Allocasuarina verticillata*), Hedge Wattle (*Acacia paradoxa*) ... [, amidst a lower storey of] Nodding Saltbush (*Einada nutans*) Wallaby-grass and Spear Grasses" on Council's Hams Road reserve (Taylors 2018: 12, 14). This vegetation is a major haven for bird species including Blue Wrens (*Malurus cyaneus*).

Noting the applicant's traffic engineers continued argument that 7.5m is an adequate surface width for small trafficked roads throughout the subject site, I can see no valid argument for removing this vegetation where there is an existing bitumen surface of 10m.

I would argue that biodiversity conservation at this subject site should be a key concern of any Local Council, and any attempt to lessen this biodiversity and extant native vegetation, especially on Council's own road reserve should not be approved but rather consciously conserved.

Notwithstanding Council's request to the consultants dated 10 October 2017 whereby

"the submitted documentation need to be amended to recognise this patch of vegetation and clarify what is proposed in respect to its retention or removal. There will need to be consideration given to micro-citing lot driveways to minimise impacts on this vegetation as well as discuss the location of future underground services" (CoGG cited in Practical Ecology 2018: 5),

the consultants have made application to remove this vegetation as part of their development works.

I would invite that Panel places a condition requiring the conservation this vegetation to ensure the retention and conservation of all 'Grassy Woodland' extant native vegetation on its Hams Road reserve, and ensure that such conservation is clearly stated in draft Clauses 1, 15, 18, 21, 31, 33-36, 37, 38.

I support the desire of the consultants (Taylors 2018: 14) proposing “the extensive use, where possible, of local indigenous species throughout the development site and in particular within the waterway vegetated buffer”.

I would argue that this desire should be mandatory, and included in the detail of the planning permit requested revised plans and that Council define ‘indigenous’ to comprise species listed in:

- *Zone 7 Limestone Plains and Hills* and *Zone 8 Basalt Flows* indigenous vegetation as set out in Council’s *Indigenous Plants of the Geelong Region* (CoGG 2018), and or
- the Ecological Vegetation Classes *EVC175 Grassy Woodland*, *EVC68 Creekline Woodland*, and *EVC136 Sedge Woodland* (Practical Ecology 2018: 12),

rather than permitting a generic use of the term ‘indigenous species’ to apply.

Source:

CoGG (2018), *Indigenous plants of the Geelong region*,

<https://www.geelongaustralia.com.au/indigenousplants/article/item/8ce589e1bce0fe8.aspx>

Practical Ecology (2018), *Updated Addendum to Flora and Fauna Assessment and native Vegetation Impact Analysis*, 35 and 69-93 *Hams Road, Waurin Ponds*. Preston: Practical Ecology.

1 McLaren Court
Waurm Ponds 3216

1 May 2019

The CoOrdinator
Strategic Implementation
City of Greater Geelong
PO Box 104
Geelong Vic 3220

Dear Sir/Madam,

**Planning Scheme Amendment C372
Planning Permit Applications PP662 & PP663/2017**

I wish to lodge a submission to the substance of the C372 Planning Scheme Amendment and associated Development overlay and rezoning in land in Hams Road, Waurm Ponds

While I respect the need and potential the subject land, my preferences for the future use and development of the land should be:

1. First, as a mixed passive and active open space reserve that celebrates the natural wildlife and water qualities of the subject, especially in its role in providing a biodiversity and recreational linear park/link from the Armstrong Creek corridor to the Waurm Ponds landscape. This is an important recommendation because there is major lack of recreational venues in this sector of the Waurm Ponds suburb, and especially within a normal 10 minutes walking distance. The nearest passive and or active parks to this locality is in fact along the Waurm Ponds Creek corridor to the north and along the new Armstrong Creek streamline corridor across Baanip Boulevard, both in excess of 1km away.
2. Second, if the first option is not possible, for the land to be developed at a comparable allotment density and covenant standards as currently applicable in the adjacent and adjoining Grange Park Estate. To benchmark off, to compare this tract of land, and to claim that this land is *"a logical and orderly extension of the Armstrong Creek West Precinct"* (Taylors 2018: 9), fails to recognise the integrity of different residential suburbs and landscapes of which one clear intent in the Henshall Hansen (1994) vision for Armstrong Creek was the need to spatially, physically and aesthetically ensure a separation of distance and character to the existing Waurm Ponds and Grovedale suburb landscapes.

With these points in mind, I wish to raise the following matters of concern pertaining the abovementioned application.

- Sources:
Henshall Hansen (1994), *Mount Duneed Armstrong Creek urban Development Study*. Henshall Hansen for the City of Greater Geelong.
Taylors (2018), *Town Planning Report: Section 96A Planning Scheme Amendment and Staged Subdivision of Land*. Melbourne: Taylors.

1. Residential Density and Amenities

The current area adjacent and adjoining Grange Park Estate subdivided land is residential, with average block sizes between 1500-2000 m² (and larger). The proposed development is not 'aligned with' nor "a logical and orderly extension of the Armstrong Creek West Precinct" (Taylors 2018: 9), the current amenity of the area. The majority of the proposed new blocks contained in C372 are between 300m² and 400m². This does not respect the current Grange Park Estate.

The proposed development is completely inconsistent with adjoining residential developments, and in fact an allotment <200m² cannot be found in the existing residential Waurn Ponds suburb. Thus, this proposal contradicts the intent and purpose the City of Greater Geelong Planning Scheme is seeking to protect and respect the amenity of places and suburbs ensuring that disjunct differences of density and place character has a degree of spatial and character separation. Thus, the justification by the developer that developable land is not available in the locality and that any land needs to be developed to the same density of Armstrong Creek sets in train a false argument about the need for a diversity of allotment and densities that prioritises density and choice over amenity. Even in Melbourne, where dual occupancy has taken hold, there is a high respect by VCAT that while existing density provisions enable such developments, where an appeal occurs the character and amenity of the existing landscape need to be respected.

The developers idea articulated by Taylors that the proposed C372 development is "a natural extension of the Armstrong Creek/ Mount Duneed development" is therefore both totally incorrect and misleading. This tract of land has no geographical or physical connection to any of the Armstrong Creek development. The land in question faces onto and is the last section of land in the Grange Park Estate. The fact is that this land is abutted by blocks that are typically 1500-2000m² (and larger), and are physically and characteristically closer and linked by a bike path to the 2 acre blocks on the western side of the Princes Highway (former Anglesea Road), than any Armstrong Creek land.

- Sources:

Taylors (2018), *Town Planning Report: Section 96A Planning Scheme Amendment and Staged Subdivision of Land*. Melbourne: Taylors.

2. Construction Phase

No where in the application and especially in the traffic report, is any consideration of the vehicular and truck traffic associated with the subdivision, road construction and house construction phases of this development.

While the traffic projection figures are predicated upon average house occupancy rates, no where is consideration given to the estates possible 2-5 year construction phase. It is during this phase that between 3-6 vehicle and truck movements and parking arrangements per day will be required per house construction as per normal activities occurring per house construction in Armstrong Creek. Additionally, this figure does not include the waste removal dumpster movements that are normally 1 per week per house construction.

3. Ghazeepore Road Traffic

I am concerned that the traffic modelling for this proposal is flawed being based upon:

- valid traffic movement statistical data that does not reflect the major increase in Ghazeepore Road movements accessing the Waurn Ponds Station car park (opened on 12 October 2014) that has occurred in the last two years especially as a consequence of roundabout changes to the Barwon Head – Mount Duneed connector road in the last two years, and the maturation of traffic movements on Baanip Boulevard (opened 3 June 2015) with the influx of new residents into the Armstrong Creek West suburb in the last two years who are clearly accessing the Waurn Ponds Railway Station for work transit purposes;
- assuming that consultants have concluded, due to the above flawed data, that the existing base traffic flows at the Hams Road-Ghazeepore Road-Sugargum Drive intersection is on average 120 movements south and 260 movements north daily [Traffix 2018: 4, and Attachment A] (**being 380 daily movements**) (being 43,800 south and 94,900 north yearly), and takes an assumption of a 30% increase in traffic movements [Traffix 2018: 11] resulting in an on average 156 movements south and 338 movements north (**being 494 daily movements**) (being 56,940 south and 123,370 north yearly);
- uses traffic movement statistical data gathered on 25-26 October 2016 during a non-teaching week at Deakin University's Waurn Ponds Campus (Deakin 2016);

- uses daily traffic movements for Geelong's bus system prior to the current changes to frequency and timetabling that came into effect in 2018;
- uses traffic movement statistic projections that will occur with the pending announced rail duplication and car park expansion and upgrade to the Waurm Ponds railway station; and
- uses traffic movement statistic projections that fail to factor in increased flows that will occur as a consequence of the construction of the approved Armstrong Creek West Regional Park on Ghazeepore Road.

Such data and assumptions contradict conclusions and recommendations drawn by GTA Consultants in 2011 when authoring the *Armstrong Creek West Precinct Transport Impact Assessment*. GTA Consultants state that 'Anticipated Post-Development AM Peak Hour turning Movements' at Armstrong Creek West Precinct post-development stage entering Ghazeepore Road from Baanip Boulevard would be **648 daily traffic movements**, and 'Anticipated Post-Development PM Peak Hour turning Movements' exiting Ghazeepore Road into Baanip Boulevard would be **474 daily traffic movements** (GTA Consultants 2011: 21, 22).

Such data and assumptions contradict conclusions drawn by Council's own General Manager of Transport on 14 April 2015 when reviewing 'Transport Infrastructure in Waurm Ponds' who stated that "Ghazeepore Road starts at the Princes Highway and continues through to Mt Duneed Road in a north-south direction. At present (in 2015) this road carries close to **4,000 vehicles per day**. As per the Municipal Road Management Plan, it is identified to carry traffic volumes **up to 10,000 vehicles per day**" and therefore that "key intersections along Ghazeepore Road such at Hams Road, Monterey Drive/Sugargum Drive and Baanip Boulevard all need to be reviewed. Halls Road/Sugargum Drive and Baanip boulevard intersections are identified for traffic signals" [CoGG Ordinary Meeting Agenda, 14 April 2015: 68].

Such data and assumptions contradict data stated by Council's own Traffic Engineer on 7 February 2019 on record to the Development Hearings Panel Meeting No 579 that "*The northern section of Ghazeepore Rd has an average daily traffic volume of between 6000 and 7000 vehicles. The road classification is that of a Category 4 Higher Order Collector Road, and is a council-managed road. The volumes have been steadily increasing over the years, and will continue to do so in the foreseeable future*" [CoGG Development Hearings Panel Meeting No 579, 7 February 2019: 125]. It is thus infeasible to assume that 5,880 daily movements disappear between Burgundy Drive and Sugargum Drive when travelling along Ghazeepore Road, and thus Council's own Traffic Engineer is using traffic movement data figures that dramatically contradict the data in the Traffix report.

Thus, why then is Council not listening to their own Traffic Engineer and competent asking for accurate and timely traffic evaluations for this subdivision and its implications upon the Hams Road/Ghazeepore Road/Sugargum Drive intersection?

I have concerns about the veracity of the traffic count data undertaken on 25-26 October 2016 (Traffix 2018: 3) because it occurred during a non-teaching week at Deakin University's Waurm Ponds Campus (Deakin 2016) in 2016 and does not reflect true and normal student and staff car, bus and rail use of Ghazeepore Road and Waurm Ponds Railway Station.

The Traffix projections fail to understand Deakin University's increasing tertiary student projection figures Waurm Ponds Campus, that currently hosts approximately 10,000 student enrolments. This campus is expected to grow to approximately 15,000 over the next 3-4 years due to additional classes occurring, including medical classes now commencing with the newly completed stage 1 Epworth Hospital complex, and research facilities being constructed on the campus.

The Traffix projections fail to understand that Deakin operates a three trimester system rather than a two semester system. The three trimester system is not the conventional university summer school arrangement that typically occurs in Melbourne, but rather fully-accredited assessable units integral to a undergraduate or postgraduate degree.

This failure was evident in the Traffix (2018) report authors' (a resident of Narre Warren) statements at the Waurm Ponds Library Public Meeting wherein he made the statement that he assumed that "all universities operated on a two semester system" and that "students during summer all go home". This is a flaw in traffic modelling assumptions.

Deakin students access the Waurn Ponds Campus via private car, foot, inter-campus bus, and public bus. The latter bus uses the Geelong bus service infrastructure, and all students wishing to catch the train along the Waurn Ponds-Geelong-Melbourne (or Waurn Ponds-Warrnambool) rail line take the bus from the Waurn Ponds Campus to the Waurn Ponds Station.

The Traffix projections fail to take into consideration the proposed Armstrong West Regional Active Open Space Park to be constructed on the south-east corner of Ghazepore Road and Baanip Boulevard, as contained in the *Armstrong Creek West Precinct Structure Plan* (2012), approved by Council. This designated 'Regional Park' will service both Armstrong West and Waurn Ponds residents, thus regional residents, and not simply Armstrong Creek West Precinct residents. The Park, involving 9 hockey/soccer fields and 18 tennis courts will host approximately 400 car parking spaces, with primary access onto Ghazepore Road. This facility, given the Waurn Ponds users, will escalate vehicle movement numbers on Ghazepore Road especially after school and on the weekends.

- Source:
GTA Consultants (2011), *Armstrong Creek West Precinct Transport Impact Assessment*.
CoGG (2015), *Transport Infrastructure in Waurn Ponds* in CoGG Ordinary Meeting Agenda, 14 April 2015.
CoGG (2019), Development Hearings Panel Meeting No 579, 7 February 2019.
Deakin University (2016), *Academic Calendar*, https://www.deakin.edu.au/data/assets/pdf_file/0009/677439/2016-Deakin-University-Academic-Calendar.pdf.
Traffix Group (2018) *Traffic Engineering Assessment: Proposed Rezoning and Residential Subdivision at 35 & 69-93 Hams Road, Waurn Ponds*. Glen Iris: Traffix Group.

4. Hams Road Internal Traffic

I would argue that, if this subdivision proposal proceeds, that the Hams Road bitumen surface west of the Champagne Court intersection be reduced from the proposed 20.12m bitumen width (Taylors 2018: 12) to a bitumen width of 16.0m and suitable road design measures be applied to reflect this change of width and entry into a different speed zone. There appears no economic and traffic logic in constructing a 20.12m bitumen surface for the entire length of Hams Road if the western portion will never host the same level of traffic movements and is also a 'dead end' road.

This recommended reduction of bitumen surface will additionally ensure the conservation of the extant 'Grassy Woodland' mature native vegetation of "*Drooping Sheoak* (*Allocasuarina verticillata*), *Hedge Wattle* (*Acacia paradoxa*) ... [amidst a lower storey of] *Nodding Saltbush* (*Einada nutans*) *Wallaby-grass and Spear Grasses*" on Council's Hams Road reserve (Taylors 2018: 12, 14) west of the Champagne Court intersection.

The proposal by Traffix (2018: 6) to propose specific turn bans at the Hams Road and Grange Road intersection will negate existing Council contractor rubbish truck movements.

- Sources:
Traffix Group (2018) *Traffic Engineering Assessment: Proposed Rezoning and Residential Subdivision at 35 & 69-93 Hams Road, Waurn Ponds*. Glen Iris: Traffix Group.
Taylors (2018), *Town Planning Report: Section 96A Planning Scheme Amendment and Staged Subdivision of Land*. Melbourne: Taylors.

5. Gas Infrastructure

The development proposal fails to address the natural gas infrastructure strategic planning in the *Armstrong Creek West Precinct Structure Plan* (2012), approved by Council.

The *Armstrong Creek West Precinct Structure Plan* (2012: 59) proposes that SP Austnet over 2009-2019 provides natural gas infrastructure, comprising a 180PE HP2 pipeline, to dissect the subject land east-west, including a field regulator facility, to service the burgeoning Armstrong West Precinct.

No information has been tabled that acknowledges this forward planning nor an alternate arrangement in lieu of this arrangement.

- Sources:
CoGG (2012), *Armstrong Creek West: Precinct Structure Plan*. Geelong: CoGG.

6. Surface Water Management Strategy

I am concerned that the report *Surface Water Management Strategy* (2013) is flawed in its assumptions, water flow engineering calculations, and conclusions because it is based upon the 2014 submitted Planning Scheme C276 amendment and permit application, and not the current application. The current application has a significantly different road configurations and thus affecting surface water flows, and clusters of medium density development in different locations that will affect the calculation assumptions.

One cannot evaluate nor draw sound surface water management conclusions from a report that pertains to a totally different subdivision design including differences in porous and non-porous surface areas and their locations.

- Source:
Neil M Craigie Pty Ltd (2013), *35 Hams Road and 151-229 Anglesea Road, Waurin Ponds, Surface Water Management Strategy*. Cape Schanck: Neil M Craigie Pty Ltd.

7. Ecology

I am seriously concerned about the request by the applicant to remove extant 'Grassy Woodland' mature native vegetation of "Drooping Sheoak (*Allocasuarina verticillata*), Hedge Wattle (*Acacia paradoxa*) ... [, amidst a lower storey of] Nodding Saltbush (*Einada nutans*) Wallaby-grass and Spear Grasses" on Council's Hams Road reserve (Taylors 2018: 12, 14). This vegetation is a major haven for bird species including Blue Wrens (*Malurus cyaneus*). Noting the applicant's traffic engineers continued argument that 7.5m is an adequate surface width for small trafficked roads throughout the subject site, we can see no valid argument for removing this vegetation where there is an existing bitumen surface of 10m. We would argue that biodiversity conservation at this subject site should be a key concern of Council, and any attempt to lessen this biodiversity and extant native vegetation, especially on Council's own road reserve, should not be approved but rather consciously conserved.

Notwithstanding Council's request to the consultants dated 10 October 2017 whereby

"the submitted documentation need to be amended to recognise this patch of vegetation and clarify what is proposed in respect to its retention or removal. There will need to be consideration given to micro-citing lot driveways to minimise impacts on this vegetation as well as discuss the location of future underground services" (CoGG cited in Practical Ecology 2018: 5),

the consultants have made application to remove this vegetation as part of their development works.

I request that Council re-state this request as a mandatory requirement through a new Planning Permit condition to ensure the retention and conservation of all 'Grassy Woodland' extant native vegetation on its Hams Road reserve, and ensure that such conservation is clearly stated in draft Clauses 1, 15, 18, 21, 31, 33-36, 37, 38.

I support the desire of the consultants (Taylors 2018: 14) proposing "the extensive use, where possible, of local indigenous species throughout the development site and in particular within the waterway vegetated buffer".

I would argue that this desire should be mandatory, and included in the detail of the planning permit requested revised plans and that Council define 'indigenous' to comprise species listed in:

- *Zone 7 Limestone Plains and Hills* and *Zone 8 Basalt Flows* indigenous vegetation as set out in Council's *Indigenous Plants of the Geelong Region* (CoGG 2018), and or
- the Ecological Vegetation Classes *EVC175 Grassy Woodland*, *EVC68 Creepline Woodland*, and *EVC136 Sedge Woodland* (Practical Ecology 2018: 12),

rather than permitting a generic use of the term 'indigenous species' to apply.

- Source:

CoGG (2018), *Indigenous plants of the Geelong region*,

<https://www.geelongaustralia.com.au/indigenousplants/article/item/8ce589e1bce0fe8.aspx>

Practical Ecology (2018), *Updated Addendum to Flora and Fauna Assessment and native Vegetation Impact Analysis*, 35 and 69-93 Hams Road, Waurrn Ponds. Preston: Practical Ecology.

8. Indigenous and European Heritage

The cultural heritage report (Young & Barker 2018) fails to understand the post-contact heritage of this subject site. It is of concern that a cultural heritage consultant team, possessing no first hand expertise in Geelong's cultural heritage and Aboriginal heritage knowledge and resources has been employed to prepare this report resulting in a major gap in knowledge not being tabled to the Council.

Thus, their "desktop assessment" is factually flawed. Mischievously part of this data is hidden behind the obscure unreferenced statement "*as a result of its use as a school (north-west corner only)*" (Young & Barker 2018: 5, 57) that hides the real historical and Indigenous significance of this corner of the subject site.

In 1861 one acre of land was set aside as the Duneed Aboriginal Reserve and gazetted for Aboriginal use and encampment in 1861 on Ghazeepore Road insider the present Armstrong Creek West Precinct. But, an additional one acre of land was set aside and gazetted on the intersection of Hams Road and Loutit Bay Road (now Anglesea Road / Princes Freeway) for the provision of the first National School in the Geelong district in 23 April 1860. The National School system forms the kernel of Victoria's present non-denominational state school system. This National School was to service both European children as well as Wadawurrung and Aboriginal children, operated from approximately 1860 to 1870 inside a structure erected by School Master John Gleeson, but the Education Department retained the land for education purposes until this designation was revoked in 1937 and the land subsequently sold (Lane 1991: iv, 1-3)

While Lane (1991: i-iv, 1-4) extensively discusses these arrangements, the lack of reference to the readily-online benchmark *Armstrong Creek West Precinct Desktop Cultural Heritage Assessment* (Turnbull 2009), that is used in the region by most consultants and researchers, demonstrates the lack of research rigour undertaken by Young & Barker (2018) in their assessment of the subject site.

The findings in Turnbull's (2009) report echo the *Mount Duneed Armstrong Creek Urban Development Study* by Henshall Hansen (1994) that formulated the land development strategy for Armstrong Creek. Both Henshall Hansen (1994) and Turnbull (2014) conclude that there are major sites of Wadawurrung / Aboriginal occupancy along the entire Dooliebeal / Armstrong Creek corridor, and Practical Ecology (2018: 18) states that "Areas of Aboriginal Cultural Heritage Sensitivity are outlined along the drainage line within the site". This is exactly why a large swath of this creek corridor is now conserved and managed by the Council within the Warralilly-Armstrong Creek suburbs because of the cultural sensitively of this corridor and the high propensity of excavating artefacts and burial sites. The upper tributary is the watercourse that west-east flows across the subject land. Given recent experience at Warraliliy and at the Drysdale Bypass, we would venture that the Council needs to be mindful that the prevalence of Wadawurrung artefacts may occur with any excavations and landscape modifications to the subject site.

The absence of both pieces of significant information, and in particular the National School land that is immediately adjacent to the north-western corner of this subject land is a major error in cultural heritage evidence and documentation.

- Sources:

Lane, L (ed.) (1991), *Notes on the First National School in Waurrn Chain-of-Ponds* [sic.]. Unpublished typescript, Deakin University Special Collections. Source: <https://library2.deakin.edu.au/record=b1358824-S1>

Turnbull, (2009) *Armstrong Creek West Precinct Desktop Cultural Heritage Assessment: A report to Villawood Properties P/L*. Ochre Imprints: Abbotsford.

Young & Barker (2018), *35 Hams Road and 151-229 Anglesea Road, Waurin Ponds – Proposed Residential Subdivision: Cultural Heritage Management Plan: Desktop, Standard and Complex Assessments*. Kinglake: Benchmark Heritage Management.

In Conclusion

I therefore urge council to reject this proposed subdivision and rezoning of Hams Road due to:

- the potential overdevelopment of the subject land,
- the amount of traffic it will cause during both construction and occupancy phases, the negative impact upon the amenity and character of the area,
- the prospect of dangerous car, truck, bus and service vehicle traffic flows constantly navigating the Hams Road–Ghazepore Road–Sugargum Drive also banking up to the Melbourne-Warrnambool boom-gate railway crossing,
- the negative environmental impact that will occur to the existing wildlife and avifauna that inhabit and frequent the subject land, and
- the superficial consultation and engagement strategy employed by the proponents.



Dr David Jones