

**GREATER GEELONG PLANNING SCHEME AMENDMENTS
C444GEE (SOUTHEAST LARA RESIDENTIAL GROWTH AREA)
C453GEE (LARA INDUSTRIALBUSINESS PARK)**

PLANNING AUTHORITY	Greater Geelong City Council
PROPONENT	Lara Farms Pty Ltd
SUBJECT LAND	76-156 Canterbury Road East, 705-765 Princes Highway, 785-805 Princes Highway and 610 Rennie Street, Lara

OPENING SUBMISSIONS

A. INTRODUCTION

1. These submissions are made on behalf of Lara Farms Pty Ltd (**Lara Farms**) the Proponent (and submitter number 13 & 9 respectively) with respect to Amendment C444ggee (**Southeast Lara Residential Growth Area**) (**C444**) and C453ggee (**Lara Industrial Business Park**) (**C453**) (together, the **Amendments**).
2. The Amendments facilitate the transition of the subject land for urban purposes, generally in accordance with the outcomes sought under various strategic planning documents.
3. Lara Farms has filed, and will rely upon, the following written expert evidence:
 - (a) Chris McNeill (economics)
 - (b) Mark Woodland (planning)
 - (c) Tim De Young (traffic engineering)
 - (d) Leigh Furness (traffic engineering)
 - (e) Nina Barich (drainage)
 - (f) Tom Evans (acoustics)
 - (g) Nigel Cann (process safety engineering)
4. To the extent that no party seeks to cross examine a witness, and subject to any questions the Panel may have, Lara Farms will seek leave to rely on the written statement without calling the witness to give oral evidence.
5. Lara Farms has also filed a Railway Crossing Risk Assessment report (**ALCAM report**) prepared by Peter Nelson-Furnell dated 29 March 2026. The ALCAM report

was prepared at the request of Head, Transport for Victoria and filed with this Panel at the request of Council. It is a document which has been considered by Mr Furness and Mr De Young when preparing their expert reports. Lara Farms does not intend to call Mr Nelson-Furnell.

6. A combined Transport Impact Assessment (**TIA**) (version A dated 18 March 2026) has also been filed with the Panel. This TIA was prepared as a result of Lara Farms, Council and the Department of Transport and Planning (**DTP**) agreeing that a further Traffic Impact Assessment was required to assess the impact of both Amendments. Mr Furness and Mr De Young had regard to the combined TIA when preparing their evidence.

B. THE AMENDMENT LAND

7. The overall Amendment area is bounded by the Melbourne-Geelong railway corridor to the west, Canterbury Road East to the north, Rennie Street and the Princes Freeway to the east and southeast. Figure 1 shows the parcels within the overall Amendment area.

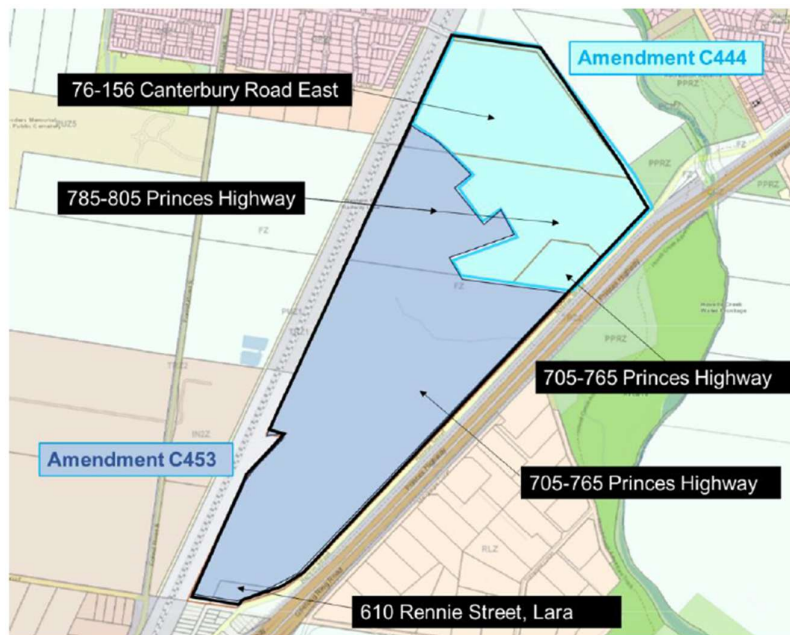


Figure 1: Subject Land for C444 and C453

8. The land that is the subject of C444 (**C444 Land**) has an area of approximately 40 hectares and comprises the parcels set out below.

Street Address	Certificate of Title	Parcel description	Registered proprietor
76-156 Canterbury Road East	Volume 09925 Folio 167	3C\15B\PP5452	Lara Farms Pty Ltd
705-765 Princes Highway	Volume 09329 Folio 313	Lot 1 on Title Plan 191059	Trevor Clarence Nash, Anthony Leo Raso and Janine Baird (executors of the estate of Donald Nash)
785-805 Princes Highway	Volume 12385 Folio 750	Lot 1 on Title Plan 156147	Lara Farms Pty Ltd

9. The C444 Land is bound by:
- to the immediate northeast, land within the FZ and Public Parks and Recreation Zone (**PPRZ**) respectively, with Hovells Creek, public open and the established GRZ1 area beyond. Further north is the Lara Town Centre and Lara Train Station (north of Station Lake Road);
 - to the immediate east is the Princes Highway, beyond which is land within the PPRZ, Public Conservation and Resource Zone (**PCRZ**) and Hovells Creek;
 - to the immediate south, land within the FZ (the subject of C453); and
 - to the immediate west, the rail corridor, beyond which is land within the FZ, the Rural Living Zone (**RLZ**) and established GRZ1 area.
10. Pursuant to the Greater Geelong Scheme, the C444 Land is:
- currently wholly within the FZ;
 - partly covered by Areas of Aboriginal Cultural Heritage Sensitivity;
 - in a Bushfire Prone Area; and
 - not affected by any overlays.
11. The land the subject of C453 (**C453 Land**) has an area of approximately 78 hectares and comprises the parcels set out below.

Street Address	Certificate of Title	Parcel description	Registered proprietor
76-156 Canterbury Road East	Volume 09925 Folio 167	3C\15B\PP5452	Lara Farms Pty Ltd
705-765 Princes Highway	Volume 09002 Folio 660	Lot 2 on Plan of Subdivision 098249	Lara Farms Pty Ltd
785-805 Princes Highway	Volume 12385 Folio 750	Lot 1 on Title Plan 156147J	Lara Farms Pty Ltd
610 Rennie Street	Volume 09002 Folio 659	Lot 1 on Plan of Subdivision 098249	Benjamin Fabretto

12. The C453 Land is bound by:
- (a) to the immediate north, land within the FZ (the subject of C444), beyond which to the northeast is land within the FZ and PPRZ respectively, with Hovells Creek, public open and the established GRZ1 area beyond. Further north is the Lara Town Centre and Lara Train Station (north of Station Lake Road);
 - (b) to the immediate east is the Princes Highway, beyond which is land within the PPRZ, PCRZ, Hovells Creek and land within the RLZ;
 - (c) to the immediate south, land within the FZ; and
 - (d) to the immediate west, the rail corridor, beyond which is land within the FZ, and
 - (e) land in the Industrial 2 Zone (**IN2Z**) within the Geelong Ring Road Employment Precinct (**GRREP**). Figure 2 shows the location of the Amendment Area and the GRREP.



Figure 2: The Amendment Area and the Geelong Ring Road Employment Precinct

13. Pursuant to the Greater Geelong Scheme, the C453 Land is:
- (a) currently wholly within the FZ;
 - (b) partly in Areas of Aboriginal Cultural Heritage Sensitivity;
 - (c) in a Bushfire Prone Area; and
 - (d) not affected by any overlays.

C. THE AMENDMENTS

14. C444 proposes to facilitate the residential development of land within urban Geelong's Settlement Boundary, which is identified in the *Lara Structure Plan 2011* as being able to accommodate residential development. The Amendment proposes:
- (a) rezoning the majority of the subject land within the Amendment area from the Farming Zone (FZ) to General Residential Zone – Schedule 1 (GRZ1), with the southern edge reserved for drainage and open space outcomes rezoned from the FZ to the Industrial 3 Zone (IN3Z) to ensure alignment with the surrounding land use. Land within the 1000m buffer of the GRREP is not rezoned for residential purposes;
 - (b) inserting a new *Development Plan Overlay - Schedule 48 - South East Lara Residential Growth Area (DPO48)* to guide future land use and development outcomes;
 - (c) applying the *Environmental Audit Overlay (EAO)* to ensure that potentially contaminated land is assessed, and, where necessary, remediated prior to the use or development that could pose a risk to human health or the environment;
 - (d) amending the *What does this Planning Scheme consist of?* (Clause 72.03) to insert a new map 19 DPO;
 - (e) amending maps 18ZN, 19ZN and 18DPO; and
 - (f) inserting maps 19DPO and 19EAO.
15. C453 proposes to facilitate the industrial and commercial development of land in accordance with the objectives sought under the *G21 Regional Growth Plan 2013* and *Lara Structure Plan 2011*. The Amendment proposes:
- (a) rezoning the land from the FZ to the Industrial 1 Zone (IN1Z) and the IN3Z;
 - (b) applying the *Design and Development Overlay – Schedule 55 (DDO55)*; and
 - (c) amending maps 18ZN, 19ZN, 26ZN, 18DDO, 19DDO and 26DDO.

D. PLANNING

16. Mr Woodland has prepared an expert report dated 9 April 2026 which provides an analysis of the Amendments from a planning perspective.

17. At section 2.1 of his report, Mr Woodland concludes that C444 is strategically justified and sets out a summary of the basis for this opinion. He then provides a summary of conclusions on key planning considerations. He is satisfied the proposed controls are generally of sufficient detail to enable the relevant planning considerations to be addressed through the Development Plan and planning permit stages.
18. However, Mr Woodland considers some further refinement is required in relation to high pressure oil and gas pipeline matters.
19. At section 2.2 of his report, Mr Woodland concludes that C453 is strategically justified and sets out a summary of the basis for this opinion. He then provides a summary of conclusions on key planning considerations. He is satisfied the proposed IN1Z and IN3Z are appropriate zones to apply to the land and is satisfied with the proposed DDO55 (subject to the resolution of the drafting of provisions that address the high pressure gas and oil pipelines) and the following recommendation in relation to tree canopy cover:
 - (a) the tree canopy requirement in DDO55 should be amended to specify that landscaping should demonstrate how it is *contributing towards* achieving the 30 percent target contained in Plan for Victoria.

E. ECONOMICS

20. Mr McNeill has prepared an expert report dated 2 April 2026 which assesses the economic aspects of the proposed Amendments.
21. In relation to C444, Mr McNeill concludes that the additional residential supply afforded by the Amendment will represent an important addition to local supply in Lara and a meaningful short-term addition to Greater Geelong's broader supply of residential land.
22. In relation to C453, Mr McNeill concludes that the rezoning of land for IN1Z and IN3Z will address identified needs for industrial land supply. He considers the draft Industrial Land Supply Review prepared by Charter Keck Cramer for the City of Greater Geelong (**CKC report**) at pages 6, 17 to 18 and 30 to 33. He concludes that the report is sound and that it provides general findings that Greater Geelong needs additional industrial land supply in both the northern and southern parts of Geelong.

23. In particular, Mr McNeill considers there is a need for additional land supply in the short term that is readily available for smaller industrial users, including opportunities for general-purpose industry needs such as those typically accommodated in the IN1Z and IN3Z. He considers industrial land supply available in the relatively short term is a specific need in Greater Geelong as most Future Precincts (land identified for future industrial development) are unlikely to be available to the market in the short term.
24. At page 6 and 34 to 36 of his report, Mr McNeill responds to the submission made by Avalon Airport in relation to the timing of the proposed Amendments having regard to the Greater Avalon Employment Precinct (GAEP) and the draft status of the CKC report. The GAEP is currently in draft form as proposed by Amendment C477ggee and is the subject of VPA Projects Standing Advisory Committee Referral 17. The referral is at pre-hearing stage.
25. Mr Woodland also comments on the Avalon submission and the assertion regarding the CKC report (at footnote 35) stating,

I understand that a submission has been made to the effect that the C453ggee land should be delayed until the Geelong Industrial Land Supply Review is completed. I do not agree with this submission on the basis that the Review is a technical data study and not a strategy. It provides important data on the current state of industrial land supply and demand in Geelong which is of relevance to the Business Park Amendment but its purpose does not extend beyond that.

26. Mr Woodland and Mr McNeill disagree with the submission made by Avalon Airport. Council also disagrees with the submission made by Avalon Airport, stating:¹

The suggestion to delay the rezoning until Council completes its industrial land supply review is also not agreed. The review is primarily an audit and forecasting exercise to be completed in early 2026. The review report will help inform preparation of any future municipal industrial land use strategy should Council commit to further work. Irrespective of the timeline for any further work, Amendment C453ggee is an ongoing proposal initiated in 2022. The amendment is with strategic merit in its current form and supported by policy in the planning scheme. The submission does not raise serious

¹ Submissions Report dated 22 January 2026.

grounds against the proposal to cause its delay to an indeterminate time. The rezoning will facilitate a diverse range of industrial and related local-scale business opportunities unlikely to be offered in the Avalon Airport industrial precinct.

27. Lara Farms endorses these opinions, which the Panel should accept as well founded.

F. TRAFFIC AND TRANSPORT

28. The exhibited materials include two Transport Impact Assessments prepared by Traffix Group and Ratio Consultants, one for each amendment.² Both reports concluded there are no traffic reasons why the Amendments should not proceed. Following discussions between Council, DTP and Lara Farms, it was agreed that a combined Transport Impact Assessment addressing both Amendments would be prepared prior to the Panel hearing.

29. The combined Transport Impact Assessment is version A dated 18 March 2026 and is at Appendix A (PDF 46) to the expert report of Leigh Furness dated 7 April 2026.

30. Lara Farms has filed two expert traffic engineering reports, the report prepared by Mr Furness assesses the full suite of traffic engineering and transport planning aspects of the proposed Amendments. Tim De Young has also prepared a report dated 7 April 2026. Mr De Young was briefed on a limited basis to conduct a peer review of the combined Traffic Impact Assessment and to comment on key matters.

31. In response to a request from the DTP, Lara Farms also arranged for an Australian Level Crossing Assessment Model (ALCAM) assessment to be completed in relation to the level crossing on Canterbury Road East. The ALCAM assessment was completed by Peter Nelson-Furnell and is contained in his Railway Crossing Risk Assessment report (**ALCAM report**) dated 29 March 2026.

32. ALCAM is used to evaluate and compare risk at road and pedestrian railway crossings. The ALCAM report concludes as follows:

- (a) No additional control upgrades to the road crossing are recommended.³

² C444 TIA version B dated 6 November 2024, C453 TIA version F05 dated 31 October 2024.

³ See generally ALCAM Report, Executive Summary at page 5, Discussion at page 23.

- i. The road crossing is appropriately controlled by train activated flashing lights and boom barriers.
 - ii. This is the highest level of control available for Victorian Road Crossings.
 - iii. The development will increase road traffic at the level crossing which will increase the risk due to train collisions.
 - iv. There are no significant factors related to the road environment, nearby intersections or other control points which might lead to vehicle congestion in the vicinity of the crossing, even with the proposed traffic increases.
 - v. The increased traffic is adequately accommodated by the existing crossing infrastructure.
- (b) A formal pedestrian crossing facility is required on the southern side of the roadway and an active pedestrian crossing with automatic gates and latched egress escape gates is recommended.⁴
- i. The development will increase pedestrian and cycle traffic using the level crossing.
 - ii. There are no pedestrian paths at the level crossing. This means that pedestrians cannot safely use the roadway.
 - iii. The number and mixed speeds of trains at the crossing means it is not possible for pedestrians or cyclists to judge whether it is safe to cross.
 - iv. Pedestrians must be properly regulated to prevent them from bypassing controls.
 - v. It is recommended that corridor fencing be provided running from the eastern pedestrian maze back along the rail corridor.
 - vi. It is also recommended that wing fencing be provided on the southern side of the western access path to keep pedestrians from straying into the rail corridor.

⁴ See generally ALCAM Report, Executive Summary at page 5, Discussion at pages 24 to 28.

- vii. Pedestrian crossings on shared paths are designed on the assumption that cyclists will dismount. In practice, cyclists seldom dismount at active gated pedestrian crossings.
 - viii. It is recommended that the width of the crossing enclosure and path be constructed to the maximum practical in order to minimise the effects of cyclists passing pedestrians while on the tracks.
- 33. Both Mr Furness and Mr De Young had regard to the ALCAM report in preparing their evidence.
- 34. Mr Furness concludes that the proposed Amendments are acceptable from a traffic and transport point of view, and states a number of opinions at paragraph 6 of his report, including:
 - (a) development proposed for the Amendment land can be accommodated by the surrounding road network with mitigating works in the form of:
 - i. upgrade of the existing Canterbury Road East level crossing;
 - ii. lane treatments on Rennie Street at the intersection with Canterbury Road East;
 - iii. upgrade of Canterbury Road East to a connector style road;
 - iv. treatments to or closure of Nasmyth Street to encourage local traffic to access the Avalon Road interchange via Archimedes Avenue;
 - (b) traffic generated by rezoning the land can be accommodated by the surrounding road network with only minor impacts to the operation of key intersections;
 - (c) the existing bus network is able to be extended along Canterbury Road East to ensure the vast majority of future dwellings, industrial land use, and the potential regional sports reserve would be adequately serviced by public transport;
 - (d) making recommendations for the introduction of footpaths/shared paths and a pedestrian connection.
- 35. Mr Furness comments on the exhibited DPO48 and DDO55 controls and some changes sought in submissions by DTP in section 6 of his report (page 30). He makes

a number of recommendations for changes to the drafting. Once the Day 1 controls are filed, Mr Furness will be asked to provide his comments on anything arising in those draft controls.

36. Mr Furness responds to specific submissions in section 7 (page 34).
37. Mr De Young sets out his analysis and opinion in relation to key transport matters raised by Council, DTP and other submitters including:
 - (a) The Rennie Street floodway – heavy vehicle traffic (page 26);
 - (b) Serviceability of Nasmyth Street/Princes Highway Service Road (page 27);
 - (c) Watt Street and alternative routes (page 28);
 - (d) Rennie Street closure due to flooding of Hovells Creek (page 29)
 - (e) Avalon Road interchange in the context of GAEP planning (page 30)
 - (f) Capacity of Avalon Road interchange, performance of Watt Street and Avalon Road intersection, and Nasmyth and Watt Street use (page 30);
 - (g) Canterbury Road East level crossing (page 31)
 - (h) Comments by DTP on the exhibited TIAs which have subsequently been addressed in the combined TIA (page 32 to 33)
 - (i) Matters of drafting for DPO48 (page 33) and DDO55 (page 34).
38. Mr De Young concludes (at page 35) that the matters raised by Council, DTP and third parties have been appropriately considered and where necessary addressed by the combined TIA and further analysis contained in his own report. Having regard to Planning Practice Note 46 (Strategic Assessment Guidelines), Mr De Young considers (at page 45) that the Amendment appropriately address relevant strategic questions, and the proposed development is unlikely to result in a significant impact on the transport system.

G. HIGH PRESSURE GAS AND OIL PIPELINES

39. The Amendment land is within the vicinity of six high pressure oil or gas pipelines. Under the *Pipelines Act 2005*, APA is the licensed operator of gas pipelines and Viva Energy is the licensed operator of the oil pipelines. The licensees are required to comply with various legislative requirements and standards including to operate the

pipelines in accordance with *AS/NZS 2885 Pipelines - Gas and liquid petroleum (AS2885)*.

40. Five of the six pipelines run parallel the Princes Highway within the road reserve, with one pipe (the White Oil Pipeline, **WOPL**) situated between the highway and Rennie Street. The Lara-Iona High Pressure Gas Pipeline (**T92**) runs east-west through the C453 land near to the boundary with the C444 land.
41. The various pipelines are described in the expert report prepared by Mr Cann. Mr Cann also explains the concept of “measurement length” at section 4.2 of his report. In simple terms, the measurement length represents the area in which there will be a significant safety impact in the event of the worst case pipeline failure. It is a distance calculated and applied to each side of the pipeline.
42. Measurement length is applicable to all pipelines, however APA has submitted that because its pipes are constructed as “no rupture” pipes, it is not necessary to consider the full measurement length for its pipes. Rather, APA considers that a reduced “area of consequence” of 85 metres on either side of the pipe is the appropriate area of impact to be considered for the purposes of the Amendments. Lara Farms agrees with this position.
43. Mr Cann sets out some useful diagrams which depict the areas of the Amendment land subject to the various pipeline measurement lengths or areas of consequence as appropriate at Figures 10 to 15 of his report.
44. Having regard to the measurement lengths of the Viva oil pipelines, Mr Cann’s figures show that the White Oil Pipeline (**WOPL**) measurement length provides the greatest coverage of the Amendment land.⁵ The WOPL figure is extracted below.

⁵ Whilst the Altona-Geelong pipeline (**WAG**) measurement length is greater than that of the WOPL, it does not encroach within the Amendment land to the same extent because the WAG is located on the southeastern side of the Princes Highway.

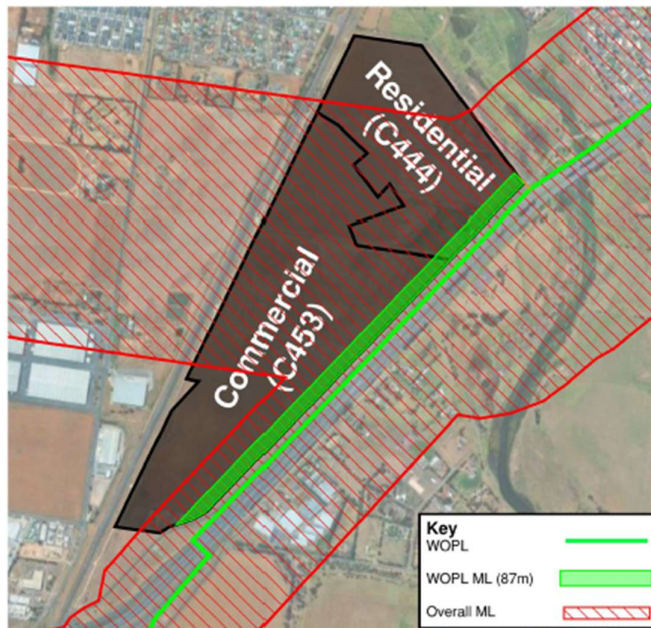


Figure 13: Approximate impact on the Lara Farms land by WOPL pipeline measurement length

45. Having regard to the areas of consequence of the APA gas pipelines, a portion of both the C444 and the C453 land is affected by the area of consequence applied to T92 as shown in the figure excerpted below.

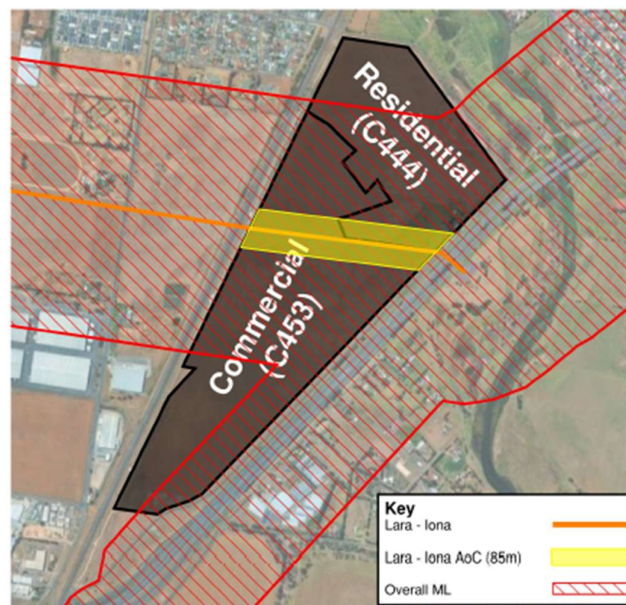


Figure 15: Approximate impact on the Lara Farms land by Iona to Lara pipeline area of consequence

46. As part of the regulatory requirements placed upon each pipeline licenses, each pipeline operator must prepare and maintain a Safety Management Study (SMS) for

each pipeline. An SMS is a tool for ensuring continued pipeline safety management. AS2885 requires that the SMS for a licensed pipeline be revised at intervals to facilitate periodic reassessment of threats and control effectiveness.

47. A specific SMS review is triggered by changed operating conditions, major encroachments or major land use changes.⁶
48. The SMS should be viewed as a “living” document which is maintained and, where necessary, updated by the licensed operator in accordance with its regulatory obligations and in response to:
 - (a) operational changes or encroachments which may impact the safety or integrity of the pipe itself, or
 - (b) changes to use of land in the vicinity of the pipe which may result in safety concerns for land users rather than for the pipe itself.
49. Importantly, AS2885 draws a distinction between an update to the SMS which results from:
 - (a) a change in land use (**land use SMS**), where a change in land use has implications because of the location of the pipe, and
 - (b) the encroachment of works which may represent a danger to the pipe itself (**encroachment SMS**).
50. Mr Cann describes the trigger for, and information required to conduct, an encroachment SMS at paragraphs 4.4.12 and 4.4.13 of his report. Inputs required to conduct an encroachment SMS include full details of construction works methods (including the type and size of proposed construction equipment). This information is obviously only available following preparation of detailed design for proposed development. It is not information that is usually available at the time that a rezoning of land is being considered, a development plan is being prepared or a planning permit application is submitted to Council.
51. Because the Amendments propose to rezone land, which would result in a change to permissible uses for the Amendment land, Mr Cann’s report is focused on

⁶ Cann report, 4.4.9

requirements in relation to the preparation of a land use SMS, and not an encroachment SMS.

52. Inputs to a land use SMS are described by Mr Cann at paragraph 4.4.11. The bulk of work associated with preparing a land use SMS takes place in a workshop convened for that purpose by an independent facilitator.
53. The attendance of representatives of the pipeline licensee at the workshop, and the disclosure of some material prior to the workshop, is integral to preparation of a land use SMS. The pipeline licensee holds information which must be considered by the workshop – it holds information regarding the design, location, operation and technical specifications of the pipe as well as previous SMS documentation and other material.
54. Put simply, it is not possible to hold an SMS workshop without the participation of the pipeline licensee. Consequently, it is not possible to prepare a land use SMS without the co-operation of the pipeline licensee.
55. AS2885 defines a number of primary and secondary location classes based on the predominant land use and density of human activity. These classes reflect both threats to the pipeline system from land use and the consequences for land users if there is a loss of containment in relation to the pipeline. The classes are set out by Mr Cann at section 4.1.3 of his report and include a class described as “sensitive use (S) – schools, hospitals, aged care facilities and prisons are some of the uses considered sensitive”. The AS2885 definition of “sensitive land uses” is set out at section 4.1.4 of Mr Cann’s report.
56. AS2885 requires that, for existing pipeline systems, the allocated location classes (that is the land use classifications under the AS location class system)

shall be reviewed to take full account of current land use and authorised developments along the pipeline route, but need not take full account of land use which is planned but not implemented.⁷

⁷ See excerpt in Cann report, 4.4.8

57. On one view, it could be said that a land use SMS is not required at the point of preparation of the Development Plan because such a plan involves land use which is planned, but not implemented.
58. However, that is not the approach taken by Mr Cann who concludes that a land use SMS should form part of an application for planning approval.⁸ However, Mr Cann does not form an opinion on the appropriate planning instrument by which to achieve this outcome.
59. The planning aspects of the gas and oil pipeline matters are also discussed in Mr Woodland's expert report. Mr Woodland did not have the benefit of reviewing Mr Cann's report prior to finalising his own report. It is also understood that the day 1 material will contain changes to the pipeline provisions in both controls. On those bases, Mr Woodland has reserved his opinion on pipeline matters and drafting.
60. Lara Farms agrees that the DPO control needs to address the presence of the high pressure gas and oil pipelines on the Amendment land. It agrees that it should include appropriate provisions that enable the responsible authority to be satisfied that their presence has been properly considered, and that appropriate steps can be taken to ensure that they can be safely operated in the future despite the proposed changes in land uses. However, it is also important for the Panel to ensure that those provisions are practicable, workable and preserve the ability for actions and decisions made with respect to the pipelines to be subject to independent review and supervision by the Council and by VCAT.
61. To that end, Lara Farms will assist the Panel by providing suggested drafting for provisions that meet these objectives.

H. DRAINAGE

62. Ms Barich has prepared an expert report on stormwater and drainage dated 7 April 2026. Ms Barich reviewed relevant materials including the following:
- (a) Stormwater Management Strategy (Loetis, 11 November 2024, rev 6 which encompasses both C444 and C453)

⁸ Cann report, 4.10.11, 5.1.7, 6.1.12

(b) Lara Farms Development Limeburners Bay Ramsar Wetland Impact Assessment (Venant solutions, 6 November 2024, rev 3 which encompasses both C444 and C453)

63. On identifying that the RORB modelling did not include any climate change modelling, Ms Barich undertook her own modelling and assessment in this regard.
64. A summary of Ms Barich's opinion is at section 12 of her report (page 19). She does not raise any matter relating to drainage which would indicate the Amendments are not appropriate including with regard to proposed infrastructure, stormwater quantity and quality requirements and impacts to the downstream receiving waterway (Hovells Creek), or the floodplain or Limeburners Bay Ramsar wetland.
65. Ms Barich makes a number of recommendations for amendments to DPO48 and DDO55 at section 11 of her report (pages 16 to 17). Lara Farms requests these amendments to the controls be recommended by the Panel.

I. ACOUSTICS

66. The material exhibited for amendment C444 includes a technical assessment by Darren Tardio of Enfield Acoustics (January 2024) of acoustic matters, with a focus on traffic and train noise assessment.
67. Lara Farms has filed an expert report prepared by Mr Evans dated 2 April 2026 in relation to acoustic matters for both C444 and C453. Mr Evans reviewed the report prepared by Mr Tardio and carried out supplementary monitoring to assess the validity of the measurements in Mr Tardio's report.
68. Subject to recommendations set out at Table 6 (page 27) of his report in relation to DPO48, Mr Evans finds the Amendments are appropriate from an acoustic engineering perspective. In summary, Mr Evans' recommendations in relation to DPO48 are:
- (a) The Train and Rail Noise Impact Assessment could be separated into a requirement for:
- i. a Traffic Noise Impact Assessment within 250m of the nearest trafficable lane of the Princes Highway.
 - ii. A Rail Noise Impact Assessment within 180m of the centre of the nearest V/Line track.

- (b) The L_{Aeq} noise criteria in exhibited DPO48 are appropriate but the following criterion should be added:
 - i. “55 dB L_{Amax} when measured within a sleeping area between 10pm and 6am”
 - (c) Removal of the dot point which commences, “For areas other than sleeping and living areas, adopts the median value ...” on the basis that the requirement goes beyond that typically required for new residential development in Victoria and it could cover a broad range of uses not typically considered noise sensitive.
69. As to methodology, in Mr Evans’ opinion the following acoustic considerations are relevant to the proposed Amendments:⁹
- (a) reverse amenity effects on the C444 land because new noise sensitive residential uses are to be introduced adjacent to the Princes Highway and rail way (**reverse amenity effects**);
 - (b) the facilitation of new industrial noise sources by rezoning of land to industrial in C453 and to a more limited extent in C444 (**new industrial uses**); and
 - (c) potential impacts on existing noise sensitive areas (residential areas to the west of the land in Blackbird Circuit and MacGregor Court) by changing industrial noise limits through rezoning of land in C453 (**existing noise sensitive areas**).
70. Table 5 in Mr Evans’ report sets out a summary of his approach to noise assessment for different elements relevant to the Amendments. Table 5 from his report is extracted below.

⁹ Evans Report, Section 3.2

Table 5 Summary of noise assessment criteria and approach

Noise source	Noise receiver	Noise assessment criteria and approach
Road traffic noise from Princes Highway	Future residential land uses in the Residential Amendment area	Design new noise-sensitive development in areas where road traffic noise level exceeds 63 dB LA10,18h to: <ul style="list-style-type: none"> • Use building layout and orientation to provide shielded outdoor areas and minimise exposure to road traffic noise. • Achieve internal noise criteria of 40 dB LAeq,16h within living areas. • Achieve internal noise criteria of 35 dB LAeq,8h within sleeping areas.
Rail noise from V/Line corridor	Future residential land uses in the Residential Amendment area	Design new noise-sensitive development to: <ul style="list-style-type: none"> • Use building layout and orientation to provide shielded outdoor areas and minimise exposure to rail noise. • Achieve internal noise criteria of 40 dB LAeq,16h within living areas. • Achieve internal noise criteria of 35 dB LAeq,8h and 55 dB L_{Amax} within sleeping areas
Future industrial noise sources in the Business Park Amendment area	Future residential land uses in the Residential Amendment area & Existing residential land uses around the boundary of the Land	Future industrial noise sources must comply with the EP Act and EP Regulations, including prescribed noise limits set using the Noise Protocol.

71. In relation to **reverse amenity effects**, Mr Evans considers the approach taken by Mr Tardio and analyses existing and expected road traffic and rail noise levels.
72. As to road traffic noise levels, he sets out a number of mitigation measures to reduce noise at residential receivers to within the relevant limit and that the exhibited DPO48 appropriately encompasses those matters.¹⁰
73. As to rail traffic noise levels, he concludes that LAeq noise levels comply with the relevant investigation thresholds and significant building construction measures are unlikely to be required to achieve appropriate internal LAeq noise levels. In relation to sleep disturbance, Mr Evans recommends an internal assessment criterion of 55 dB LAmax as being aligned with the typical approach taken to sleep disturbance assessments in Victoria. This is lower than the 65 dB LAmax recommended by Mr Tardio on the basis of other land covenants applied to residential subdivisions.¹¹
74. Lara Farms accepts this recommendation.

¹⁰ Evans report section 5.2

¹¹ Evans report, 4.9.8

75. Having regard to the measures L_{Amax} noise levels, Mr Evans expects that the relevant levels will be exceeded in some parts of the Amendment area. Therefore, he recommends that proposed residential development within certain areas be required to consider rail noise mitigation, and makes recommendations for the incorporation of suitable changes to DPO48 to accommodate this.¹²
76. In relation to **new industrial uses**, following analysis of the matter Mr Evans considers there is no need for any specific planning controls for industrial noise emissions as part of the C453 Amendment because sufficient controls already exist within the Planning Scheme (Clause 13.05-1) and the EP Regulations.¹³
77. In relation to **existing noise sensitive areas**, following analysis of the matter Mr Evans does not consider there is a need for specific planning controls to address the minor effect of changes in noise limits at existing residences because sufficient controls already exist within the Planning Scheme (Clause 13.05-1) and the EP Regulations.¹⁴
78. Mr Evans responds to specific matters raised by submitters, including DTP in section 9 of his report.

J. DAY 1 DRAFTS

79. Council is due to file Day 1 amendments on 13 April 2026. Lara Farms understands there will be material changes included in the drafts of DPO48 and DDO55. As the expert witnesses have not reviewed these, Lara Farms does not intend to comment further on the drafting at this time.
80. Further submissions on matters which have arisen during the hearing will be provided at the appropriate time.

**Nick Tweedie
Tiphonie Acreman**

Instructed by Norton Rose Fulbright Australia

13 April 2026

¹² Evans report section 6.1 and 6.2

¹³ Evans report, section 7.1

¹⁴ Evans report, section 7.2