MINUTES

COUNCIL MEETING

Tuesday 25 August 2026
6:00 pm

City Hall
57 Little Malop Street, Geelong 3220

LIVE STREAMED ON THE CITY'S WEBSITE:

www.geelongaustralia.com.au/meetings

COUNCIL:

Cr S Kontelj (Kardinia Ward) - Mayor
Cr E Kontelj (Hamlyn Heights Ward) - Deputy Mayor
Cr R Nelson (Barrabool Hills Ward)
Cr E Sinclair (Charlemont Ward)
Cr M Cadwell (Cheetham Ward)
Cr E Wilkinson (Connewarre Ward)
Cr A Aitken (Corio Ward)
Cr A Katos (Deakin Ward)
Cr T Sullivan (Leopold Ward)
Cr R Story (Murradoc Ward)
Cr C Burson (You Yangs Ward)

CITY OF GREATER GEELONG

1. PROCEDURAL MATTERS 4
1.1. Acknowledgement of Country 4
1.2. Apologies 4
1.3. Leaves of Absence 4
1.4. Declarations of Conflicts of Interest 4
1.5. Confirmation of Minutes 4
1.6. Public Question and Submission Time 5
2. REPORTS 28
2.1. Second Youth Council Report 2026 28
2.2. Place Naming Policy 31
2.3. Draft West Fyans - Fyans Street Precinct Structure Plan 36
2.4. Northern and Western Geelong Growth Areas Strategic Assessment Finalisation 41
2.5. Amendment C450ggee - Creamery Road Precinct Structure Plan - Consideration of Panel Report and Adoption of Plan 53
2.6. Amendments C444ggee South East Lara Residential Growth Area & C453ggee Lara Business Park - Consideration of Panel Report and Adoption of Amendments 62
2.7. Newcombe Street (Princess Street - The Glen), Drysdale - Finalisation of Special Rate and Charge Scheme SRC 373 68
2.8. Declaration of Public Road pathway s204(1) (2), Mindil Street, Armstrong Creek 71
2.9. Planning Committee Terms of Reference 76
2.10. MAV State Council Meeting Motions 78
2.11. T2600059 - Limeburners Boat Ramp Redevelopment Stage 2 82
2.12. T2600014 - Enterprise Asset Management Services Integrator 86
3. RECORD OF INFORMAL MEETINGS OF COUNCILLORS 90
4. CONFIDENTIAL 91
4.1. Land Acquisition Program Implementation - Delegations (Confidential) 91
4.2. T2600077 - Operation & Management of the Interim Geelong Resource Recovery Centre (Confidential) 91
4.3. T2600069 - Microsoft Licensing Services (Confidential) 92
5. CLOSE OF MEETING 93

Present: Cr S Kontelj
Cr E Kontelj
Cr R Nelson
Cr T Sullivan
Cr A Aitken
Cr E Wilkinson
Cr E Sinclair
Cr A Katos
Cr M Cadwell
Cr R Story
Cr C Burson

Also Present: A Wastie (Chief Executive Officer), T Edwards (Executive Director, Corporate Services), J Randles (Executive Director, Growth and Place), J Stirton (Executive Director, City Infrastructure), A Higgs (Acting Executive Director City Life), A Martin (Chief Governance and Risk Officer) S Beck (Acting Manager Council & Corporate Governance) D Pangrazio (Acting Senior Governance Advisor – Council Business) R Fleury (Corporate Communications Officer - Mayor & Councillor).

Opening: The Mayor declared the meeting open at 6.04pm.

Cr A Katos returned to the meeting at 7.35pm.

2.4. Northern and Western Geelong Growth Areas Strategic Assessment Finalisation

Source: **Growth & Place**
Interim Executive Director: **Jacqueline Randles**

Purpose

1. To seek Council's endorsement of the final Environment Protection and Biodiversity Conservation Plan (EPBC Plan) and associated implementation documents prepared for the Northern and Western Geelong Growth Areas Strategic Assessment.

2. To request the Commonwealth Minister for Environment to endorse and approve the EPBC Plan and associated documents.

Background

3. The City of Greater Geelong (the City) has identified two areas for urban growth known as the Northern and Western Geelong Growth Areas (known as "NWGGA" or "the Growth Areas").

4. The municipal *Settlement Strategy 2020* and the *Northern and Western Geelong Growth Areas Framework Plan 2020* which are part of the Greater Geelong Planning Scheme identify these areas for urban development until 2047 accommodating up to 110,000 residents.

5. The development of the Growth Areas will lead to impacts to various biodiversity values which are protected under the Commonwealth *Environment Protection and Biodiversity Conservation Act (*EPBC Act) and Victorian state biodiversity regulations.

6. The City is undertaking a strategic assessment under Part 10 of the EPBC Act. This will support the development of the Growth Areas while protecting matters of national environmental significance (MNES) as defined by the EPBC Act. The Strategic Assessment provides landscape scale assessment and approval of development under the EPBC Act, and the opportunity to deliver improved environmental and developmental outcomes. Where a Strategic Assessment is in place, landowners can reach agreement with Council to rely on its approval in lieu of having to apply for and obtain individual approvals.

7. In January 2022, the City entered an agreement with the Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW) now known as the National Environment Protection Agency (National EPA) to undertake a Strategic Assessment.

8. The Strategic Assessment considers impacts to MNES from development in the entire Northern Geelong Growth Area and two northern precincts of the Western Geelong Growth Area.

9. At its meeting on 25 July 2023 Council endorsed the release of a draft EPBC Plan, Strategic Assessment Report and associated implementation documents for public consultation. The consultation occurred from 26 July 2023 until 25 September 2023.

10. The project was then put on hold due to the rediscovery of the Victorian Grassland Earless Dragon elsewhere in Victoria.

11. As NWGGA is within the range of potential habitat for the species the Strategic Assessment area was extensively re-surveyed in 2024. While no Victorian Grassland Earless Dragon were found during the survey effort, the EPBC Plan and associated documents were revised to account for impacts to the species and to respond to comments received during the 2023 exhibition.

12. Public exhibition of the revised draft EPBC Plan, Strategic Assessment Report and associated implementation documents occurred for one month from 6 November until 8 December 2025. A total of 17 submissions were received including submissions from land developers, community and environmental groups and government agencies.

13. Between January and June 2026, the City and its consultants reviewed the submissions and met with submitters to work through issues raised. There were several meetings with Lovely Banks Development Group and Commonwealth and state government agencies regarding the approach to Victorian Grassland Earless Dragon.

14. In July 2026 the City received advice from the National EPA that recent reforms of the EPBC Act have implications for the Western Growth Areas inclusion in the Strategic Assessment. Changes to legislation that came into effect on 20 February 2026 mean that the Strategic Assessment and Part 10 approval now exclude land subject to individual referral applications by developers that have been made to the Commonwealth under Parts 7-9 of the EPBC Act at the time the Minister approves the Strategic Assessment.

15. The majority of land in the Creamery Road precinct, located within the Western Growth area, is subject to individual Part 7-9 referrals. If these referrals remain in place implementation of a Part 10 approach is impractical for the Western Growth area due to a lack of access to land along Cowies Creek, and lack of developable area to collect a levy.

Key Matters

16. The Northern and Western Geelong Growth Areas EPBC Plan is the key document which will manage impacts to protected biodiversity values and facilitate development of the Growth Areas through approval under Part 10 of the EPBC Act.

17. The EPBC Plan is supported by the Strategic Assessment Report (SAR) and three implementation documents:

    17.1. The Growth Areas Commitments and Measures.

    17.2. The Growth Areas Biodiversity Conservation Strategy (BCS).

    17.3. The Growth Areas Funding Program.

18. **Attachment 1 - Strategic Assessment Summary Report** provides an overview of the key documents.

19. The Strategic Assessment Report has identified six MNES subject to potential direct impacts under the Plan including:

    19.1. Golden Sun Moth (*Synemon plana*).

    19.2. Striped Legless Lizard (*Delma impar*).

    19.3. Victorian Grassland Earless Dragon (*Tympanocryptis pinguicolla*), noting the species was not recorded during surveys.

    19.4. Blue-Winged Parrot (*Neophema chrysostoma*).

    19.5. Glossy Grass Skink (*Pseudemoia rawlinsoni*).

    19.6. Natural Temperate Grassland of the Victorian Volcanic Plain.

20. The EPBC Plan provides two strategic conservation areas and one avoidance area which protect habitat for these values. This includes the:

    20.1. Northern Conservation Area - which retains and protects a large, contiguous area of grassland that provides known habitat for Golden Sun Moth and Striped Legless Lizard, and potentially suitable areas for Victorian Grassland Earless Dragon and Blue-Winged Parrot.

    20.2. Eastern Conservation Area - which will protect and manage part of the largest patch of Natural Temperate Grassland within the Growth Areas.

    20.3. Gully avoidance area - which will protect habitat for Striped Legless Lizard and Golden Sun Moth, and areas of mapped Natural Temperate Grassland.

21. There will be residual direct impacts on Golden Sun Moth, Striped Legless Lizard and Natural Temperate Grassland which are accounted for in the EPBC offsets package.

22. Development under the EPBC Plan has the potential to result in indirect impacts to Growling Grass Frog within and downstream of the Western Growth Area. The EPBC Plan provides the Cowies Creek Conservation Area which will protect and restore habitat for the species, as well as commitments and measures for additional conservation actions downstream of the Western Geelong Growth Area. These will protect Growling Grass Frog and help improve areas of its habitat.

23. In the exhibited 2025 documents the City proposed an additional area of land be added to the Northern Conservation Area due to its habitat attributes for Victorian Grassland Earless Dragon. The land is known as Area C being 26.8 hectares and part of 550 Elcho Rd and 870 Geelong-Ballan Rd. The City considered a submission on this matter from the lead developer and consulted with Commonwealth and state agencies in early 2026.

24. The outcome of this process was a revised layout of the Northern Conservation Area that now excludes Area C. To compensate for this loss of avoidance, the City is committing to delivering an additional compensatory measure for Victorian Grassland Earless Dragon that will directly contribute to recovery of the species whereby funds (of the same value as the Area C acquisition and management being $12.7 million) are collected via the Funding Program Levy and managed by a Trust. The Trust funding will be directed by Victorian Grassland Earless Dragon experts to the highest priority and most beneficial actions for the species over the next 30 years.

25. **Attachment 2 - Public Submissions Summary Report** provides a summary of public comments received through the formal public exhibition processes of the strategic assessment, and details how public comments have been addressed in revising the document package.

26. The Strategic Assessment document package has now been finalised following the latest public consultation in late 2025 and is ready to be adopted by Council and forwarded to the Commonwealth Minister for endorsement and approval.

27. Commonwealth approval under the EPBC Act will help to facilitate development of the Growth Areas when Precinct Structure Plans (PSPs) are finalised and gazetted under the state planning processes. The main developer in the Western Growth Area precincts subject to the Strategic Assessment has advised the City of its preference to remain in the Strategic Assessment however its individual part 7-9 referrals remain. The developer has indicated it will withdraw its part 7 -9 referrals subject to agreement being reached with the City on certain implementation aspects.

28. In order to protect the City's interests it is recommended that the Western Growth Area precincts be excised from the Strategic Assessment within 1 month of lodging for approval with the Commonwealth, if the main landowner's part 7-9 referrals have not been withdrawn and suitable agreement hasn't been reached on implementation. This will prevent the risk of an approval of the Strategic Assessment that imposes obligations on Council that cannot be delivered.

RESOLUTION – Item 2.4

Cr A Katos moved, Cr T Sullivan seconded –

That Council:

1. **Endorses the Northern and Western Geelong Growth Areas Environment Protection and Biodiversity Conservation Plan (Attachment 3) and the three implementation documents: Commitments and Measures (Attachment 4), Biodiversity Conservation Strategy (Attachment 5) and Funding Program (Attachment 6);**

2. **Requests the Commonwealth Minister for Environment (or delegate) endorse and approve the Environment Protection and Biodiversity Conservation Plan and associated documents under Part 10 of the *Environment Protection and Biodiversity Conservation Act 1999*;**

3. **Authorises the Chief Executive Officer to make any necessary changes to the documents in response to feedback from the National Environmental Protection Agency to secure approval, subject to Councillors being briefed on any changes that have been made that would materially affect what Council has endorsed; and**

4. **Authorises the Chief Executive Officer to excise the Western Growth Area from the Strategic Assessment within 1 month of lodging the Strategic Assessment for Commonwealth approval if:**

   4.1. The Part 7-9 referrals are not withdrawn from the majority of land (including all land affected by referrals on Cowies Creek) in the relevant Western Growth Area precincts; and

   4.2. The City is unable to reach agreement with the principal landowner in the relevant Western Growth Area precincts regarding implementation arrangements.

Carried

Financial Sustainability

29. A Funding Program (**Attachment 6**) has been prepared which outlines how the implementation of the Plan will be funded. Costs for securing and managing conservation areas, external offsets and administration, staffing and governance over a 30-year period are included in the Funding Program. It is designed as a full cost recovery program.

30. The total cost of the Program is $141,413,920 which includes $20,358,746 for the Western Growth Area and $121,055,174 for the Northern Growth Area.

31. Similar to the approach for Development Contribution Plans total costs under the Funding Program are divided by the net developable area to calculate the levy per hectare (ha) rate. The estimated levy is $44,612 per ha for the Western Growth Area and $105,910 per ha for the Northern Growth Area. This will be confirmed as Precinct Structure Plans are gazetted and the exact amount of net developable land is known.

32. Council can agree to developers implementing works in kind for a credit against the obligation to pay the levy.

33. Costs in the Funding Program will be updated annually to keep track with present day costs by applying indexation and revaluing land parcels and external biodiversity offsets.

34. Funds are available in the current 5-year Capital Works Budget for early acquisition of three Farming Zoned properties to establish stage one of the Northern Conservation Area. This is required in the first 5 years to offset the impact of development on habitat and will allow Northern Growth Area development to commence.

Community Engagement

35. On 21 February 2022, the Federal Environment Minister sought public comment on the draft terms of reference that guide how the strategic assessment should be prepared. The terms of reference were finalised on 14 July 2022.

36. Extensive consultation with the state government Department of Energy, Environment and Climate Change Action (DEECA) and federal government National EPA has been undertaken.

37. Consultation has been undertaken with landowners and developers in the precinct on the baseline data, location and scale of conservation reserves and options for delivering offsets and funding.

38. Consultation sessions with environment interest groups were undertaken on 21 and 22 February 2023. Key issues raised included the need to incentivise conservation on private land, management of the Moorabool River, opportunities for biodiversity linkages, and implications of poor biodiversity planning in past development projects.

39. Formal public exhibition of the draft Strategic Assessment occurred on two occasions:

    39.1. First exhibition from 26 July until 25 September 2023 – see web page https://yoursay.geelongaustralia.com.au/GGASA .

    39.2. Re-exhibition from 6 November until 8 December 2025 - see web page https://yoursay.geelongaustralia.com.au/strategicassessment

40. Full details of the public submissions received to the public exhibitions and the City's responses to issues raised are in **Attachment 2 - Public Submissions Summary Report.**

41. Environmental and community groups, state and Commonwealth government agencies, and the Wadawurrung Traditional Owners Aboriginal Corporation also participated in meetings and workshops during two Structured Decision-Making (SDM) processes.

42. The first SDM process was completed in 2022 to determine the initial layout of the Growth Areas as exhibited in 2023.

43. To respond to comments from the 2023 public exhibition process, and the rediscovery of the Victorian Grassland Earless Dragon, the City undertook a second SDM process in 2024 to help determine the optimal layout of the Growth Areas.

Social Equity and Sustainability

44. The Strategic Assessment Report and Plan consider social, economic and environmental drivers and they have influenced the development of the Plan and implementation documents.

45. The preparation of the plan included a structure decision making process to evaluate the performance of 10 options against these criteria and establish a conservation program that was implementable while achieving acceptable outcomes across the social, economic and environmental criteria.

Gender Equality – Gender+ Impact Assessment

46. A Gender Impact Assessment (GIA) was not undertaken for this report as it does not meet the requirements of the *Gender Equality Act 2020*.

47. The report relates purely to biodiversity conservation and management and associated regulatory approvals.

Relevant Law/Policy/Legal Implications

48. When the EPBC Plan is approved under part 10 of the *EPBC Act*, the City will be the approval holder. The City will be accountable for outcomes, commitments and measures included over the 30-year life of the program. The draft EPBC Plan includes annual and five yearly reporting to the National EPA.

49. The City is also responsible for ensuring third-parties who undertake an approved action under the endorsed Plan (including works-in-kind under the Funding Program) take these actions in accordance with the requirements of the Plan. The legislative framework also requires that third parties undertake relevant classes of action in accordance with the Plan.

50. Development is approved under Part 10 of the EPBC Act through 'classes of actions' that represent the scope of development that may be undertaken in accordance with the Plan.

51. There are five classes of actions that are included in the Plan:

    51.1. Urban and commercial development.

51.2. Industrial development.

51.3. Rural development.

51.4. Supporting infrastructure and services.

51.5. Environmental management.

52. The provisions of the EPBC Act and the endorsed Plan provide the legal basis for the collection of the biodiversity levy and the implementation of the developer registration system in accordance with the Funding Program.

53. Following is the legal explanation of the legislative changes that have led to the City's recommendation that if Part 7-9 referrals aren't withdrawn from the major landholdings in Creamery Road precinct the Western Growth Area will need to be excised from the Strategic Assessment.

54. On 1 December 2025, the *Environment Protection Reform Act 2025* (Cth) (**Reform Act**) received royal assent. The Reform Act makes consequential amendments to the EPBC Act across two tranches: the first tranche took effect on 20 February 2026, and the second tranche took effect on 1 July 2026.

55. Of particular relevance is section 267 of the Reform Act, which inserted a new section 146BA into the EPBC Act with effect from 20 February 2026.

56. Section 146BA provides that despite anything in an approval under section 146B, a Part 10 approval does not apply in relation to an action where, amongst other circumstances, the action was referred to the Minister under section 68 of the EPBC Act before the Part 10 approval came into force and, immediately before the Part 10 approval was granted, either the Minister had not yet decided whether the action is a controlled action, or the Minister had not decided whether to approve the taking of the action.

57. In plain terms, the effect of section 146BA(e) is that any action that was referred to the Minister under Part 7 of the EPBC Act and in respect of which a decision on that referral had not yet been made at the time the Part 10 approval comes into force will be excluded from the operation of the Part 10 approval. Such actions will fall outside the strategic approval framework entirely, and the landholders concerned will be required to pursue their own standalone Part 9 assessment and approval processes.

58. As stated earlier in this report the majority of land in the Creamery Road precinct is subject to individual Part 7-9 referrals making implementation of a Part 10 approach impractical due to the reduction of land to collect a biodiversity levy and most critically a lack of access to land along Cowies Creek to implement conservation works and create Growling Grass Frog habitat. If part of the Western Growth Area is excised from the Strategic Assessment individual developers will have legal responsibility for their environmental approvals.

Alignment to Council Plan and Vision

59. This report aligns with the Council Plan 2025-29 strategic priority:
Core and Critical Infrastructure
Environment and Circular Economy

60. This report aligns with the Community led 30-year Vision, "Greater Geelong: A Clever and Creative Future" community aspiration:

Development and implementation of sustainable solutions.

Sustainable development that supports population growth and protects the natural environment.

Conflict of Interest

61. No officer involved in the preparation of this report declared a general or material conflict of interest.

Risk Assessment and Risk Appetite Statement

62. As a complex and major project affecting large areas of land and with a long implementation phase there are a number of risks that need to be considered.

63. The initial risk is if Council decides not to adopt the Strategic Assessment documents and seek Commonwealth approval. The City has an obligation under the Agreement with the Commonwealth to continue with the program with the current steps being undertaken in accordance with clause 5.10 as follows:

    63.1. "5.10 Following consideration of any public comments received (if any), the City of Greater Geelong will prepare, and then submit to the Environment Department for further comment: a) a copy of all public comments; b) a revised draft Strategic Assessment Report that takes into account the public comments received (if any); c) a revised draft Plan that takes into account the public comments received (if any); and d) a Supplementary Report which demonstrates how all public comments have been addressed through revisions to the draft Strategic Assessment Report or Plan (if required)."

64. If the City does not finalise the Strategic Assessment, development of the Growth Areas will be unable to proceed at least until alternative EPBC Act approval arrangements are put in place (such as individual Part 7-9 approvals). It would likely take many months or years to resolve and adequately address the complex matters at hand where biodiversity protection and management is occurring in conjunction with significant urban development. This would also mean the City has no head of power to collect a levy for implementation.

65. Council has a balanced appetite to environment and waste risks. The recommendation to adopt the Plan and seek Commonwealth approval enables environmental improvement within regulatory boundaries and taking this decision meets environmental and heritage obligations while creating measurable improvement in sustainability outcomes.

66. Council has a cautious appetite to financial risks. The recommendation to adopt the Plan and associated Funding Program commits Council to management and implementation of the Plan over a 30-year period including financial aspects. The City has approached the Funding Program and Commitments and Measures cautiously to ensure long-term financial sustainability is protected. This includes adjustments made to the documents in the lead up to and post the 2025 re-exhibition. Timeframes for implementation commitments such as land and offset acquisition have been adjusted to more realistic timings to ensure the City can manage the initial financial impact. While the cost of program is funded by development there will be a delay between the expenditure on implementing elements of the Plan and the collection of levies.

67. The recommendation to remove the Western Growth Area precincts from the Strategic Assessment within 1 month of lodging for approval with the Commonwealth, if the

main landowner's part 7-9 referrals have not been withdrawn will prevent the risk of an approval of the Strategic Assessment that imposes obligations on Council that cannot be delivered.

68. It is considered the decision being recommended is affordable within Council's financial capacity and supported by credible funding and lifecycle projections. The City has significant experience with managing Development Contributions Plans which are similar to the proposed Funding Program and of a larger financial scale.

69. Over the 30-year life of the Plan the Funding Program ensures full cost recovery through a biodiversity levy collected as development occurs hence lessening structural budget pressure, unfunded liabilities, or unacceptable future cost burdens. Given the overall cost of the program and risk to the City to ensure compliance, dedicated staff resources, executive oversight and monitoring and compliance programs are included in the EPBC Plan and Funding Program.

Environmental Sustainability

70. Biodiversity assessments undertaken through the Strategic Assessment process recorded federally listed threatened species, including confirmed habitat for Golden Sun Moth, Striped Legless Lizard, a significant population of Growling Grass Frog, areas of the nationally threatened Natural Temperate Grasslands of the Victorian Volcanic Plains and potential habitat for the Victorian Grassland Earless Dragon noting the species was not recorded during recent targeted surveys (Biosis, 2024).

71. Biodiversity values which have been identified by on-ground surveys of the Growth Areas include (EHP, 2021):

    71.1. **Areas of native vegetation** - including Plains Grassland (EVC 132), Creekline Grassy Woodland (EVC 68), and Floodline riparian woodland (EVC 56).

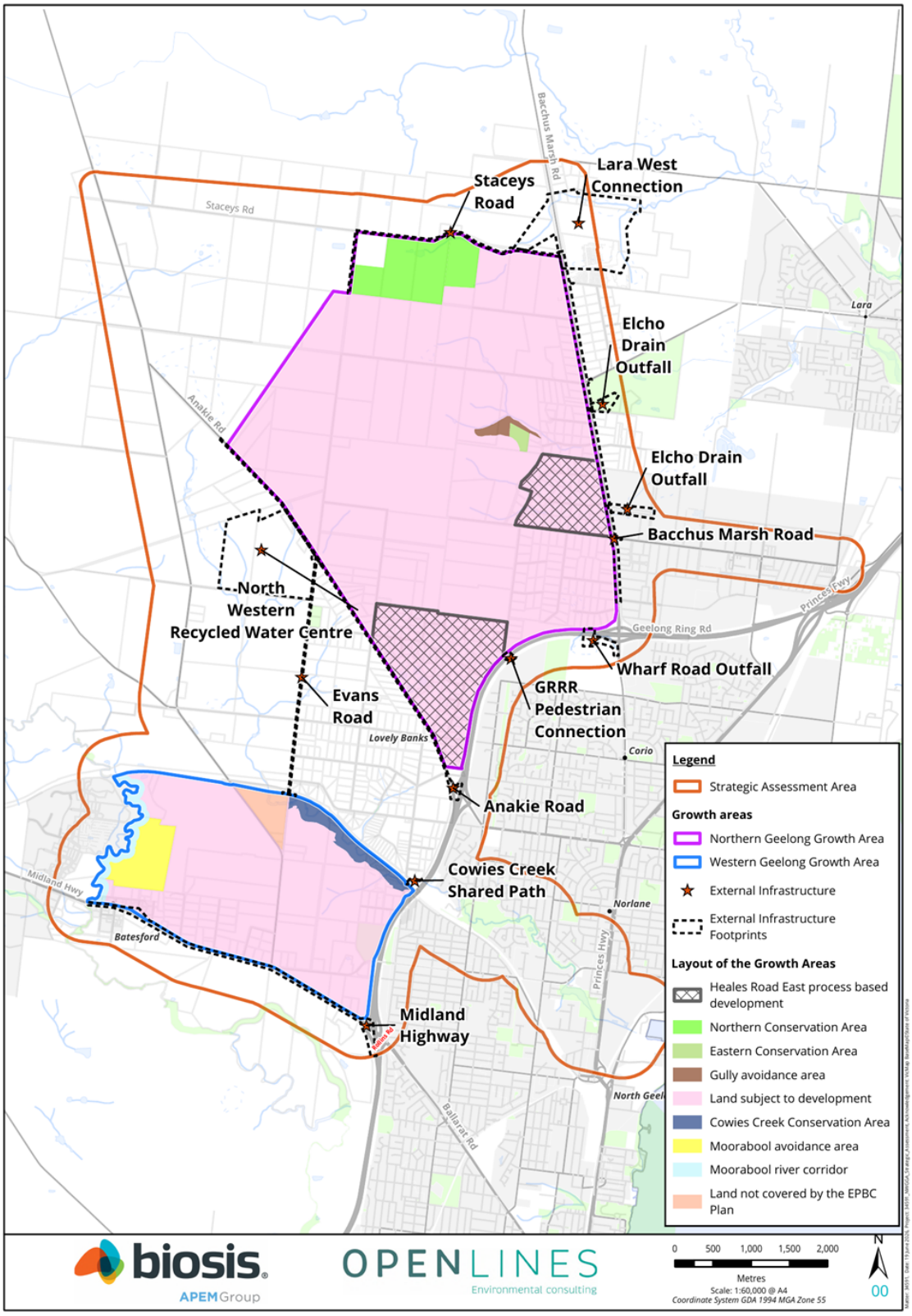
    71.2. **Threatened ecological communities** - including the Commonwealth listed Natural Temperate Grassland of the Victorian Volcanic Plain and the state significant Western (Basalt) Plains Grassland in the Northern Geelong Growth Area.

    71.3. **Threatened flora** - including the Commonwealth listed Adamson's Blown Grass (*Lachnagrostis adamsonii*) (historical records) and the state significant Leafless Bluebush (*Maireana aphylla*).

    71.4. **Threatened fauna** - including three Commonwealth listed species – the Golden Sun Moth (*Synemon plana*), Striped Legless Lizard (*Delma impar*), and Growling Grass Frog (*Ranoidea raniformis*), three state significant species - Hardhead (*Aythya australis*), Fat-tailed Dunnart (*Sminthopsis crassicaudata*), and Tussock Skink (*Pseudemoia pagenstecheri*), and an active Platypus burrow within the Moorabool River. There is also potential habitat for the Victorian Grassland Earless Dragon noting the species was not recorded during recent targeted surveys (Biosis, 2024).

    71.5. **Waterways** - including the Moorabool River and Cowies Creek which provide known and potential habitat for a range of fauna species.

72. The strategic assessment process identified four strategic conservation areas and two avoidance areas to be protected from development under the EPBC Plan. These are shown on the plan below.


Staceys Road
Lara West Connection
Elcho Drain Outfall
Elcho Drain Outfall
Bacchus Marsh Road
North Western Recycled Water Centre
Evans Road
Wharf Road Outfall
GRRR Pedestrian Connection
Anakie Road
Cowies Creek Shared Path
Midland Highway
Staceys Rd
Bacchus Marsh Rd
Anakie Rd
Lara
Princes Fwy
Geelong Ring Rd
Lovely Banks
Corio
Norlane
Midland Hwy
Batesford
Princes Hwy
Ballarat Rd
Legend
Strategic Assessment Area
Growth areas
Northern Geelong Growth Area
Western Geelong Growth Area
External Infrastructure
External Infrastructure Footprints
Layout of the Growth Areas
Heales Road East process based development
Northern Conservation Area
Eastern Conservation Area
Gully avoidance area
Land subject to development
Cowies Creek Conservation Area
Moorabool avoidance area
Moorabool river corridor
Land not covered by the EPBC Plan
biosis
APEM Group
OPEN LINES
Environmental consulting
0 500 1,000 1,500 2,000
Metres
Scale: 1:60,000 @ A4
Coordinate System GDA 1994 MGA Zone 55
N
00

Attachments

1. Attachment 1 – NWGGA Strategic Assessment Summary Report July 2026 [**2.4.1** - 13 pages]
2. Attachment 2 – NWGGA Public Submissions Summary Report July 2026 [**2.4.2** - 76 pages]
3. Attachment 3 - NWGGA Environment Protection & Biodiversity Conservation Plan July 2026 [**2.4.3** - 91 pages]
4. Attachment 4 – NWGGA Commitments and Measures July 2026 [**2.4.4** - 60 pages]
5. Attachment 5 – NWGGA Biodiversity Conservation Strategy July 2026 [**2.4.5** - 86 pages]
6. Attachment 6 - NWGGA Strategic Assessment Funding Program July 2026 [**2.4.6** - 40 pages]

Cr E Kontelj declared a conflict of interest in relation to item 2.5 and left the meeting at 7.39pm

2.5. Amendment C450ggee - Creamery Road Precinct Structure Plan - Consideration of Panel Report and Adoption of Plan

Source: **Growth & Place**
Interim Executive Director: **Jacqueline Randles**

Purpose

1. To notify Councillors about changes to the draft planning scheme amendment C450ggee of the Greater Geelong Planning Scheme since Council endorsed its preparation and exhibition at its meeting on 27 August 2024, noting the Minister for Planning, not the City, is the planning authority for draft amendment.

2. To seek a Council resolution to support the updates to the Creamery Road Precinct Structure Plan (PSP) (Attachment 5), Development Contributions Plan (DCP) (Attachment 6) and Native Vegetation Precinct Plan (NVPP), and request that the Minister for Planning consider Amendment C450ggee under Section 20(4) of the *Planning and Environment Act 1987* (the Act).

Background

3. The Northern and Western Geelong Growth Areas (NWGGA) Framework Plan was adopted into the Greater Geelong Planning Scheme through Amendment C395 in May 2021. The NWGGA Framework Plan guides the development of the area to provide housing for 110,000 people.

4. In 2022, the City entered into an agreement with the Minister for Planning to appoint the NWGGA Standing Advisory Committee (the SAC) to advise on referred matters relating to the Northern and Western Geelong Growth Areas. This includes draft precinct structure plans, development contributions plans, biodiversity conservation strategy and any associated draft planning scheme amendments. The Minister appointed the SAC under Section 151(7) of the Act on 31 January 2023.

5. The processes and procedures of any relevant draft amendment referred to the SAC operate under the NWGGA SAC Terms of Reference. The Minister for Planning, not the City, is the planning authority for any amendments referred to under the Terms of Reference and will consider the final amendment under Section 20(4) of the Act.

6. The Creamery Road Precinct is the first precinct proposed to be developed as part of the Western Geelong Growth Area (WGGA). When developed, WGGA is anticipated to deliver approximately 22,000 new dwellings and house a population exceeding 60,000 persons. The Creamery Road Precinct is expected to accommodate approximately 4,200 dwellings housing around 11,770 residents.

7. The Creamery Road Precinct Structure Plan (PSP) will facilitate the urban development of Geelong's newest neighbourhood. It was prepared in accordance with the NWGGA Framework Plan, Clause 11.03-2S (Growth Areas) of the Greater Geelong Planning Scheme, and the PSP 2.0 Guidelines (VPA, 2021) which outlines a hierarchy of relevant considerations and delivery outcomes. These elements are grounded in state policy and strategy, or key future directions for greenfield precincts.

8. On 27 August 2024 Council resolved to prepare and exhibit Draft Amendment C450ggee. The Draft Amendment has been prepared by the City of Greater Geelong on behalf of the Minister for Planning who is the planning authority in this matter.

9. The Draft Amendment incorporates the Creamery Road PSP, Development Contributions Plan (DCP), Native Vegetation Precinct Plan (NVPP), applies the Urban Growth Zone Schedule 8 (UGZ8), and makes ordinance and mapping changes to support implementation of the PSP.

10. It also proposes measures to ensure that urban development within the Northern and Western Geelong Growth Areas is undertaken in a manner consistent with the NWGGA Environment Protection and Biodiversity Conservation Plan (EPBC Plan) and supporting documents.

11. Following SAC Referral 1 in 2025, Council officers undertook significant further work to refine the amount of encumbered land and the scope of projects covered under the DCP. This resulted in consequential changes to the land use, infrastructure provision, and drafting of the exhibited Creamery Road PSP and DCP. The exhibited PSP included more than 16 hectares of additional net developable area (NDA) than the previous version, capable of yielding an additional 320 dwellings and at least 900 more residents.

12. Through the increase in NDA and a thorough review and refinement of the scope and cost of projects included in the Creamery Road DCP, the exhibited Development Infrastructure Levy rate of $823,453 per net developable hectare was significantly lower than the August 2024 figure of $1,599,840 per net developable hectare.

13. The updated draft amendment was put out for public consultation between 17 December 2025 to 9 February 2026, during which time 28 submissions were received.

14. On 16 February 2026, Council under delegation referred the unresolved submissions to the Minister for Planning in accordance with Clause 20 of the NWGGA SAC Terms of Reference.

15. Further revisions were made to the Draft Amendment documents in response to submissions from landowners, developers and agencies, to address the recommendations made by the NWGGA SAC and incorporate directions from the Minister for Planning.

16. The SAC's report was released in July 2026 and is available online at the PPV website and Council's C450 draft amendment webpage – refer to **Attachment 1** for the executive summary.

Key Matters

17. Overall, the SAC provided strong support for the draft Amendment.

18. The SAC provided support for Council's spatial plan for the Precinct (refer to **Attachment 4**), including Council's preferred locations for active open space and the neighbourhood activity centre.

19. The SAC found that the draft Amendment strikes the right balance between providing sufficient developable land and ensuring that appropriate infrastructure is available to support future communities living in the precinct. The SAC was satisfied that the extent of developable land has been appropriately maximised since the Referral 1 process.

20. The SAC found that the overall rate of the DCP Levy is appropriate, subject to some refinements.

21. The SAC found that the Cowies Creek conservation buffer was generally appropriate and concluded the relationship with the *Environment Protection and Biodiversity Conservation Act* (EPBC Act) strategic assessment process could be suitably managed with appropriate drafting.

22. The SAC found the proposed drainage infrastructure as generally appropriate with agreed improvements and refinements to Basins 6 and 7.

23. The SAC identified that certain transport infrastructure designs and costings needed to be reviewed to ensure they were appropriate to accommodate future growth.

24. The SAC recommended various minor drafting changes which can be incorporated. Overall, drafting changes in response to submissions and SAC recommendations have substantially reduced the number of provisions in the PSP, offering developers more flexibility while ensuring the PSP can still deliver on its objectives.

25. Council officer's consideration of the SAC's findings is set out in **Attachment 2** and a table summary of Council's responses to the SAC's recommendations is included at **Attachment 3**.

26. In summary, Council officers support the vast majority of the SAC's recommendations.

27. Council officers do not fully accept the recommendation for further strategic transport modelling which is considered unnecessary given the detailed assumptions of previous modelling combined with recent additional transport intersection design work undertaken. Council officers do not fully accept the recommendation to further expand the scope of the DCP in relation to Bridge 1 (northern approach road), noting the likely major increase to the DCP levy from this global item.

28. Council officers are now finalising the draft C450ggee documentation in response to the findings and recommendations in the *NWGGA Standing Advisory SAC Referral 2 Report Vols 1& 2* (1 July 2026).

29. The officer-accepted SAC recommendations for PSP and DCP refinements have both increased and decreased DCP costs (noting further refinements to net developable area), resulting in an estimated generally neutral cost impact to the exhibited draft DCP rate of $823,453 per net developable hectare (costed to July 2025).

30. A working draft DCP, which incorporates the officer-agreed SAC changes to DCP items able to be finalised to date, is provided at **Attachment 6**. Limited further work is underway on the final arterial intersection designs and costings, and final planning cost calculations. This work is expected to be completed by late August / early September 2026, and the resultant costs will be included in the final draft DCP.

31. It is recommended that the draft Amendment C450 (refer attached) is endorsed and following finalisation of documentation, is submitted to the Minister for Planning to request approval.

PROCEDURAL MOTION

Cr A Aitken moved, Cr M Cadwell seconded -

That Council defer consideration of item 2.5 Amendment C450ggee – Creamery Road Precinct Structure Plan - Consideration of Panel Report and Adoption of Plan until further notice.

Lost

DIVISION
For: Cr's A Aitken, M Cadwell, T Sullivan
Against: Cr's C Burson, A Katos, R Nelson, S Kontelj, E Wilkinson, E Sinclair, R Story

RESOLUTION – Item 2.5

Cr A Katos moved, Cr T Sullivan seconded -

That Council:

1. **Adopts the draft Creamery Road Precinct Structure Plan (Attachment 5) and draft Development Contributions Plan (Attachment 6), generally in accordance with the drafts attached to this report;**

2. **Authorises the Executive Director Growth & Place to:**

   2.1 **Finalise the Creamery Road Precinct Structure Plan, Creamery Road Development Contributions Plan, and the associated planning scheme amendment documentation for Amendment C450ggee, generally in accordance with the drafts attached to this report;**

   2.2 **Submit Amendment C450ggee, together with the finalised Precinct Structure Plan, Development Contributions Plan, Native Vegetation Precinct Plan, and all relevant ordinance and incorporated documentation, to the Minister for Planning; and**

   2.3 **Request that the Minister for Planning approve Amendment C450ggee pursuant to section 20(4) of the Planning and Environment Act 1987.**

Carried

DIVISION
For: Cr's C Burson, A Katos, S Kontelj, E Wilkinson, E Sinclair
Against: Cr's A Aitken, M Cadwell, R Nelson, R Story, T Sullivan

The Mayor used his casting vote under rule 3.38.4 of Council's Governance Rules and voted in favour of the motion resulting in the motion being carried.

Financial Sustainability

32. It is proposed to apply a DCP to the Creamery Road precinct to fund specific local infrastructure. The PSP and DCP have been prepared by the City. Preparation of these documents was mostly funded through third party funding agreements with major landowners. Planning costs, such as fees paid to consultants to complete technical assessments that inform the PSP and DCP, are included in the DCP levy. This means that these planning costs will be recovered by the City and third-party funders when developers undertake subdivision and development.

33. The total DCP infrastructure cost is approximately $241 million, of which it is anticipated approximately $170 million will be recovered under the Creamery Road DCP. These figures are likely to marginally increase once Council officers finalise updates in response to the SAC's Recommendation 4c, including:

    33.1. Design updates and associated re-costing of arterial intersections IN_01, IN_03, IN_04, IN_05 and IN_06.

    33.2. Updates to planning costs once all further work has been completed to account for fees incurred in the processing of the draft amendment since November 2025.

34. The DCP does not cover delivery of all infrastructure in the precinct. The monies not apportioned to the Creamery Road DCP will be covered under future DCPs or apportioned to Council. As at 30 July 2026, project costs apportioned to the City (i.e. not recovered by the CRDCP and requiring City funds in the future) are estimated at ~$5.4 million (costed to July 2025) due to:

    34.1. Partial apportionment of the Myers Reserve Extension (DI_OS_01) estimated at $2,048,700.

    34.2. Partial apportionment of community infrastructure, estimated at approximately $3.4 million, noting the Community Infrastructure Levy (CIL) rate is capped.

35. The DCP will become an incorporated document in the planning scheme which would legally bind Council to the provisions of the plan.

36. The DCP levy is significantly lower than as specified in August 2024, at roughly half the cost per net developable hectare. This is due to the removal of several transport, drainage, and community infrastructure projects, and a refinement of the scope of costings. This reduction in projects reduces the burden on Council to deliver projects, and the associated risk of that delivery demand.

37. The SAC found no evidence that, as exhibited at $823,453 per net developable hectare, the levy would negatively impact development feasibility.

38. Greater Geelong will benefit from the economic growth generated in the short-medium term through the construction of the precinct and in the longer term through the precinct's commercial areas. The precinct will contribute to Geelong's supply of housing that is well connected to jobs and services.

39. Contributions towards community facilities in the Creamery Road precinct will also apply in the form of a Community Infrastructure Levy consistent with section 46L of the *Planning and Environment Act 1987*.

40. The DCP will enable the collection of contributions from developers to ensure that identified infrastructure can be funded and provided. The City will act as the collecting agency and may deliver the infrastructure or enter into agreements with developers to deliver this infrastructure through works-in-kind and land contributions.

Community Engagement

41. The draft amendment has undergone multiple rounds of engagement, including two referrals to the Ministerially-appointed NWGGA SAC (see Table 1).

42. Table 1. Overview of engagement on draft Creamery Road PSP & DCP

Date	Engagement	Outcomes
May 2022	Initial Agency Consultation	Updates to Future Place Based Plan
Mar 2023	Landowner Consultation	Further work on drainage and transport studies which lead to refined plans and technical reports.
Apr to May 2025	SAC Referral 1	Further work on drainage, open space, and transport which lead to: • a 15-hectare increase in NDA; • a halving of the DCP levy; and • increase in predicted dwelling yield and population.
Nov 2025 to Feb 2026	Formal Public Consultation	Further work on conservation area, drainage, and zoning.
Apr to May 2026	SAC Referral 2	Refinement of DCP costings and drafting matters.

43. The first referral SAC sat in April-May 2025. Against the request of Council officers, the Minister directed that the scope of the notification for this referral be limited to those parties directly affected. It was attended by a number of developers (including those with land holdings in NWGGA precincts other than Creamery Road), agencies, and residential landowners. The purpose of this referral was to identify opportunities for increasing the Net Developable Area (NDA) and reducing the DCP levy.

44. Further work then commenced, in consultation with key developers, that included the adoption, with review, of Batesford Property Pty Ltd's (Villawood) tabled drainage network and core transport infrastructure.

45. The second referral SAC sat in April-May 2026, after a period of public consultation, and was attended generally by the same parties. The focus of this referral was the matters unresolved from submissions received during consultation. In an unusual arrangement, Villawood were given the chance to present a closing statement to the SAC.

46. Council officers are satisfied that there has been sufficient and rigorous consultation with developers and other stakeholders in the preparation of the amendment, and that the SACs to which now two subsequent drafts of the amendment have been referred is well-equipped to ensure a balanced consideration of all parties' views.

Social Equity and Sustainability

47. The PSP contains significant social equity considerations, to accommodate Greater Geelong's significant growth rate and plan for the future provision of affordable housing and employment opportunities that meet community needs.

48. The PSP will guide development in a manner that addresses the City's responsibility to deliver vibrant, walkable neighbourhoods with high amenity, access to community facilities, environmental sustainability, abundant open space, and activity centres that provide daily needs and jobs for residents.

49. The PSP will provide for community facilities, a public primary school, public parks and reserves, the revegetation of Cowies Creek and the establishment of active transportation links and public transport all of which will provide social benefit to the existing and future community. The existing community facilities within the PSP area were considered in its preparation, particularly to allow for future expansion as needed due to the increased catchment that will utilise the school.

50. Provisions facilitating the voluntary contribution of affordable housing in the precinct will help Geelong remain a vibrant and connected city of opportunity, increasing the chances for young workers or families to own a home close to their established social networks, in a location that is well serviced with jobs and services.

51. Protection and enhancement of Wadawurrung cultural heritage is an important objective for the PSP. The final PSP takes into account findings and recommendations of the Cultural Values Assessment (CVA) and Aboriginal Cultural Heritage Impact Assessment (ACHIA) completed in 2023, as well as input from the Wadawurrung Traditional Owners Aboriginal Corporation (WTOAC) who are the Registered Aboriginal Party (RAP) for this area.

Gender Equality – Gender+ Impact Assessment

52. A Gender Impact Assessment was not undertaken during the preparation of the draft Amendment or its associated documents as it does not meet the requirements of the *Gender Equality Act 2020*. The report does not involve new or reviewed policies, programs or services, and it does not have a direct or significant impact on the public.

Relevant Law/Policy/Legal Implications

53. The Northern and Western Geelong Growth Areas are identified in state, regional and local policy as growth areas including in the G21 Regional Growth Plan. Council adopted a Settlement Strategy in October 2018 which highlights the importance of the growth areas in supporting Geelong's long term land supply.

54. The Settlement Strategy and NWGGA Framework Plan were adopted into the Greater Geelong Planning Scheme through Amendment C395. The amendment was gazetted on 6 May 2021.

55. Input from relevant policy areas in Victorian Government agencies was sought and has been taken into account in preparing the Creamery Road PSP. This included regular input and guidance from the Victorian Planning Authority (VPA), Department of Energy, Environment and Climate Action (DEECA), Department of Transport and Planning (DTP), Department of Education (DoE), Environment Protection Authority (EPA) Victoria, Corangamite Catchment Management Authority (CCMA) and Barwon Water.

56. The draft amendment is prepared under the *Planning and Environment Act 1987.* Under Section 151 of the Act, the Minister for Planning appointed a SAC to advise on matters related to draft amendments in NWGGA.

Alignment to Council Plan and Vision

57. This report aligns with the Council Plan 2025-29 strategic priority:
    Core and Critical Infrastructure
    Economic Development
    Environment and Circular Economy

58. This report aligns with the Community led 30-year Vision, "Greater Geelong: A Clever and Creative Future" community aspiration:
    A fast, reliable and connected transport network.
    A prosperous economy that supports jobs and education opportunities.
    An inclusive, diverse, healthy and socially connected community.
    Development and implementation of sustainable solutions.
    Sustainable development that supports population growth and protects the natural environment.

Conflict of Interest

59. No officer involved in the preparation of this report declared a general or material conflict of interest.

Risk Assessment and Risk Appetite Statement

60. The recommendation aligns with Council's cautious appetite for Regulatory, Legal and Governance risks by implementing appropriate rezoning, overlays and other planning controls in a location identified for future development through the statutory planning scheme amendment process and supporting consistent, transparent decision-making.

61. The recommendation also aligns with Council's balanced appetite for Community risks by enabling the development of areas while protecting amenity and ensuring community infrastructure, to create a planned future sustainable residential community. Failure to proceed would result in a lack of developable residential and commercial land, limiting the area's growth potential and putting undue pressure on other areas.

62. By reducing the scope of projects in the DCP since the previous version adopted in August 2024, it relieves the burden on Council to deliver as many infrastructure projects without compromising the serviceability of the precinct. City funds will be required in the future where DCP project costs are apportioned to the City.

63. There is a risk that, should the Creamery Road PSP not be adopted, the City will not achieve the anticipated land supply for this growth area. This will detrimentally impact the City's ability to retain a 15-year supply of residential land across the municipality.

Environmental Sustainability

64. Environmental implications have been considered as part of the preparation of the PSP. Technical studies relating to the capability of land including assessments of native flora and fauna, Aboriginal and post-contact heritage, geotechnical, hydrogeological, and environmental constraints, stormwater drainage, noise assessment, bushfire risks and land use buffers have been completed.

65. The PSP identifies actions to protect biodiversity including an overarching biodiversity conservation strategy, protection of conservation areas, tree canopy coverage targets, significant tree retention and tree planting.

66. A key objective of the PSP is to protect significant environmental and landscape values including the Cowies Creek Conservation Area and key views identified in the Framework Plan.

67. The PSP includes provisions that will contribute to environmentally sustainable design and the City's zero carbon objectives.

68. The Creamery Road NVPP has an important role as it summarises the biodiversity values across the precinct; applies a holistic, landscape wide approach to retention and removal of native vegetation; and ensures that areas retained for the protection of native vegetation are managed to conserve ecological values in accordance with the relevant strategies and assessments for the precinct.

Attachments

1. NWGGA SAC Referral 2 (Creamery Road) Executive Summary [**2.5.1** - 10 pages]
2. Consideration of C450ggee Committee Report [**2.5.2** - 17 pages]
3. Response to NWGGA SAC Referral 2 Report Recommendations [**2.5.3** - 7 pages]
4. Creamery Road Future Place Based Plan [**2.5.4** - 2 pages]
5. Draft Creamery Road Precinct Structure Plan (August 2026) [**2.5.5** - 177 pages]
6. Draft Creamery Road Development Contributions Plan (August 2026) [**2.5.6** - 55 pages]

AGENDA

—

COUNCIL MEETING

Tuesday 25 August 2026
6:00 pm

City Hall
57 Little Malop Street, Geelong 3220

TO BE LIVE STREAMED ON THE CITY'S WEBSITE:
www.geelongaustralia.com.au/meetings

COUNCIL:

Cr S Kontelj (Kardinia Ward) - Mayor
Cr E Kontelj (Hamlyn Heights Ward) - Deputy Mayor
Cr R Nelson (Barrabool Hills Ward)
Cr E Sinclair (Charlemont Ward)
Cr M Cadwell (Cheetham Ward)
Cr E Wilkinson (Connewarre Ward)
Cr A Aitken (Corio Ward)
Cr A Katos (Deakin Ward)
Cr T Sullivan (Leopold Ward)
Cr R Story (Murradoc Ward)
Cr C Burson (You Yangs Ward)

CITY OF GREATER GEELONG

1. PROCEDURAL MATTERS 4
1.1. Acknowledgement of Country 4
1.2. Apologies 4
1.3. Leaves of Absence 4
1.4. Declarations of Conflicts of Interest 4
1.5. Confirmation of Minutes 4
1.6. Public Question and Submission Time 4
1.7. Petitions 4
2. REPORTS 5
2.1. Second Youth Council Report 2026 5
2.2. Place Naming Policy 15
2.3. Draft West Fyans - Fyans Street Precinct Structure Plan 60
2.4. Northern and Western Geelong Growth Areas Strategic Assessment Finalisation 204
2.5. Amendment C450ggee - Creamery Road Precinct Structure Plan - Consideration of Panel Report and Adoption of Plan 581
2.6. Amendments C444ggee South East Lara Residential Growth Area & C453ggee Lara Business Park - Consideration of Panel Report and Adoption of Amendments 858
2.7. Newcombe Street (Princess Street - The Glen), Drysdale - Finalisation of Special Rate and Charge Scheme SRC 373 907
2.8. Declaration of Public Road pathway s204(1) (2), Mindil Street, Armstrong Creek 915
2.9. Planning Committee Terms of Reference 928
2.10. MAV State Council Meeting Motions 940
2.11. T2600059 - Limeburners Boat Ramp Redevelopment Stage 2 946
2.12. T2600014 - Enterprise Asset Management Services Integrator 950
3. RECORD OF INFORMAL MEETINGS OF COUNCILLORS 954
4. CONFIDENTIAL 959
4.1. Land Acquisition Program Implementation - Delegations (Confidential) 959
4.2. T2600077 - Operation & Management of the Interim Geelong Resource Recovery Centre (Confidential) 959
4.3. T2600069 - Microsoft Licensing Services (Confidential) 960
5. CLOSE OF MEETING 960

5.1. Close of Meeting 960

2.4. Northern and Western Geelong Growth Areas Strategic Assessment Finalisation

Source: **Growth & Place**
Interim Executive Director: **Jacqueline Randles**

Purpose

1. To seek Council's endorsement of the final Environment Protection and Biodiversity Conservation Plan (EPBC Plan) and associated implementation documents prepared for the Northern and Western Geelong Growth Areas Strategic Assessment.

2. To request the Commonwealth Minister for Environment to endorse and approve the EPBC Plan and associated documents.

Background

3. The City of Greater Geelong (the City) has identified two areas for urban growth known as the Northern and Western Geelong Growth Areas (known as "NWGGA" or "the Growth Areas").

4. The municipal *Settlement Strategy 2020* and the *Northern and Western Geelong Growth Areas Framework Plan 2020* which are part of the Greater Geelong Planning Scheme identify these areas for urban development until 2047 accommodating up to 110,000 residents.

5. The development of the Growth Areas will lead to impacts to various biodiversity values which are protected under the Commonwealth *Environment Protection and Biodiversity Conservation Act (*EPBC Act) and Victorian state biodiversity regulations.

6. The City is undertaking a strategic assessment under Part 10 of the EPBC Act. This will support the development of the Growth Areas while protecting matters of national environmental significance (MNES) as defined by the EPBC Act. The Strategic Assessment provides landscape scale assessment and approval of development under the EPBC Act, and the opportunity to deliver improved environmental and developmental outcomes. Where a Strategic Assessment is in place, landowners can reach agreement with Council to rely on its approval in lieu of having to apply for and obtain individual approvals.

7. In January 2022, the City entered an agreement with the Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW) now known as the National Environment Protection Agency (National EPA) to undertake a Strategic Assessment.

8. The Strategic Assessment considers impacts to MNES from development in the entire Northern Geelong Growth Area and two northern precincts of the Western Geelong Growth Area.

9. At its meeting on 25 July 2023 Council endorsed the release of a draft EPBC Plan, Strategic Assessment Report and associated implementation documents for public consultation. The consultation occurred from 26 July 2023 until 25 September 2023.

10. The project was then put on hold due to the rediscovery of the Victorian Grassland Earless Dragon elsewhere in Victoria.

11. As NWGGA is within the range of potential habitat for the species the Strategic Assessment area was extensively re-surveyed in 2024. While no Victorian Grassland Earless Dragon were found during the survey effort, the EPBC Plan and associated documents were revised to account for impacts to the species and to respond to comments received during the 2023 exhibition.

12. Public exhibition of the revised draft EPBC Plan, Strategic Assessment Report and associated implementation documents occurred for one month from 6 November until 8 December 2025. A total of 17 submissions were received including submissions from land developers, community and environmental groups and government agencies.

13. Between January and June 2026, the City and its consultants reviewed the submissions and met with submitters to work through issues raised. There were several meetings with Lovely Banks Development Group and Commonwealth and state government agencies regarding the approach to Victorian Grassland Earless Dragon.

14. In July 2026 the City received advice from the National EPA that recent reforms of the EPBC Act have implications for the Western Growth Areas inclusion in the Strategic Assessment. Changes to legislation that came into effect on 20 February 2026 mean that the Strategic Assessment and Part 10 approval now exclude land subject to individual referral applications by developers that have been made to the Commonwealth under Parts 7-9 of the EPBC Act at the time the Minister approves the Strategic Assessment.

15. The majority of land in the Creamery Road precinct, located within the Western Growth area, is subject to individual Part 7-9 referrals. If these referrals remain in place implementation of a Part 10 approach is impractical for the Western Growth area due to a lack of access to land along Cowies Creek, and lack of developable area to collect a levy.

Key Matters

16. The Northern and Western Geelong Growth Areas EPBC Plan is the key document which will manage impacts to protected biodiversity values and facilitate development of the Growth Areas through approval under Part 10 of the EPBC Act.

17. The EPBC Plan is supported by the Strategic Assessment Report (SAR) and three implementation documents:

    17.1. The Growth Areas Commitments and Measures.

    17.2. The Growth Areas Biodiversity Conservation Strategy (BCS).

    17.3. The Growth Areas Funding Program.

18. **Attachment 1 - Strategic Assessment Summary Report** provides an overview of the key documents.

19. The Strategic Assessment Report has identified six MNES subject to potential direct impacts under the Plan including:

    19.1. Golden Sun Moth (*Synemon plana*).

    19.2. Striped Legless Lizard (*Delma impar*).

19.3. Victorian Grassland Earless Dragon (*Tympanocryptis pinguicolla*), noting the species was not recorded during surveys.

19.4. Blue-Winged Parrot (*Neophema chrysostoma*).

19.5. Glossy Grass Skink (*Pseudemoia rawlinsoni*).

19.6. Natural Temperate Grassland of the Victorian Volcanic Plain.

20. The EPBC Plan provides two strategic conservation areas and one avoidance area which protect habitat for these values. This includes the:

20.1. Northern Conservation Area - which retains and protects a large, contiguous area of grassland that provides known habitat for Golden Sun Moth and Striped Legless Lizard, and potentially suitable areas for Victorian Grassland Earless Dragon and Blue-Winged Parrot.

20.2. Eastern Conservation Area - which will protect and manage part of the largest patch of Natural Temperate Grassland within the Growth Areas.

20.3. Gully avoidance area - which will protect habitat for Striped Legless Lizard and Golden Sun Moth, and areas of mapped Natural Temperate Grassland.

21. There will be residual direct impacts on Golden Sun Moth, Striped Legless Lizard and Natural Temperate Grassland which are accounted for in the EPBC offsets package.

22. Development under the EPBC Plan has the potential to result in indirect impacts to Growling Grass Frog within and downstream of the Western Growth Area. The EPBC Plan provides the Cowies Creek Conservation Area which will protect and restore habitat for the species, as well as commitments and measures for additional conservation actions downstream of the Western Geelong Growth Area. These will protect Growling Grass Frog and help improve areas of its habitat.

23. In the exhibited 2025 documents the City proposed an additional area of land be added to the Northern Conservation Area due to its habitat attributes for Victorian Grassland Earless Dragon. The land is known as Area C being 26.8 hectares and part of 550 Elcho Rd and 870 Geelong-Ballan Rd. The City considered a submission on this matter from the lead developer and consulted with Commonwealth and state agencies in early 2026.

24. The outcome of this process was a revised layout of the Northern Conservation Area that now excludes Area C. To compensate for this loss of avoidance, the City is committing to delivering an additional compensatory measure for Victorian Grassland Earless Dragon that will directly contribute to recovery of the species whereby funds (of the same value as the Area C acquisition and management being $12.7 million) are collected via the Funding Program Levy and managed by a Trust. The Trust funding will be directed by Victorian Grassland Earless Dragon experts to the highest priority and most beneficial actions for the species over the next 30 years.

25. **Attachment 2 - Public Submissions Summary Report** provides a summary of public comments received through the formal public exhibition processes of the strategic assessment, and details how public comments have been addressed in revising the document package.

26. The Strategic Assessment document package has now been finalised following the latest public consultation in late 2025 and is ready to be adopted by Council and forwarded to the Commonwealth Minister for endorsement and approval.

27. Commonwealth approval under the EPBC Act will help to facilitate development of the Growth Areas when Precinct Structure Plans (PSPs) are finalised and gazetted under the state planning processes. The main developer in the Western Growth Area precincts subject to the Strategic Assessment has advised the City of its preference to remain in the Strategic Assessment however its individual part 7-9 referrals remain. The developer has indicated it will withdraw its part 7 -9 referrals subject to agreement being reached with the City on certain implementation aspects.

28. In order to protect the City's interests it is recommended that the Western Growth Area precincts be excised from the Strategic Assessment within 1 month of lodging for approval with the Commonwealth, if the main landowner's part 7-9 referrals have not been withdrawn and suitable agreement hasn't been reached on implementation. This will prevent the risk of an approval of the Strategic Assessment that imposes obligations on Council that cannot be delivered.

Recommendation

That Council:

1. **Endorses the Northern and Western Geelong Growth Areas Environment Protection and Biodiversity Conservation Plan (Attachment 3) and the three implementation documents: Commitments and Measures (Attachment 4), Biodiversity Conservation Strategy (Attachment 5) and Funding Program (Attachment 6);**

2. **Requests the Commonwealth Minister for Environment (or delegate) endorse and approve the Environment Protection and Biodiversity Conservation Plan and associated documents under Part 10 of the *Environment Protection and Biodiversity Conservation Act 1999*;**

3. **Authorises the Chief Executive Officer to make any necessary changes to the documents in response to feedback from the National Environmental Protection Agency to secure approval, subject to Councillors being briefed on any changes that have been made that would materially affect what Council has endorsed; and**

4. **Authorises the Chief Executive Officer to excise the Western Growth Area from the Strategic Assessment within 1 month of lodging the Strategic Assessment for Commonwealth approval if:**

   4.1. The Part 7-9 referrals are not withdrawn from the majority of land (including all land affected by referrals on Cowies Creek) in the relevant Western Growth Area precincts; and

   4.2. The City is unable to reach agreement with the principal landowner in the relevant Western Growth Area precincts regarding implementation arrangements.

Financial Sustainability

29. A Funding Program (**Attachment 6**) has been prepared which outlines how the implementation of the Plan will be funded. Costs for securing and managing conservation areas, external offsets and administration, staffing and governance over a 30-year period are included in the Funding Program. It is designed as a full cost recovery program.

30. The total cost of the Program is $141,413,920 which includes $20,358,746 for the Western Growth Area and $121,055,174 for the Northern Growth Area.

31. Similar to the approach for Development Contribution Plans total costs under the Funding Program are divided by the net developable area to calculate the levy per hectare (ha) rate. The estimated levy is $44,612 per ha for the Western Growth Area and $105,910 per ha for the Northern Growth Area. This will be confirmed as Precinct Structure Plans are gazetted and the exact amount of net developable land is known.

32. Council can agree to developers implementing works in kind for a credit against the obligation to pay the levy.

33. Costs in the Funding Program will be updated annually to keep track with present day costs by applying indexation and revaluing land parcels and external biodiversity offsets.

34. Funds are available in the current 5-year Capital Works Budget for early acquisition of three Farming Zoned properties to establish stage one of the Northern Conservation Area. This is required in the first 5 years to offset the impact of development on habitat and will allow Northern Growth Area development to commence.

Community Engagement

35. On 21 February 2022, the Federal Environment Minister sought public comment on the draft terms of reference that guide how the strategic assessment should be prepared. The terms of reference were finalised on 14 July 2022.

36. Extensive consultation with the state government Department of Energy, Environment and Climate Change Action (DEECA) and federal government National EPA has been undertaken.

37. Consultation has been undertaken with landowners and developers in the precinct on the baseline data, location and scale of conservation reserves and options for delivering offsets and funding.

38. Consultation sessions with environment interest groups were undertaken on 21 and 22 February 2023. Key issues raised included the need to incentivise conservation on private land, management of the Moorabool River, opportunities for biodiversity linkages, and implications of poor biodiversity planning in past development projects.

39. Formal public exhibition of the draft Strategic Assessment occurred on two occasions:

    39.1. First exhibition from 26 July until 25 September 2023 – see web page https://yoursay.geelongaustralia.com.au/GGASA .

39.2. Re-exhibition from 6 November until 8 December 2025 - see web page https://yoursay.geelongaustralia.com.au/strategicassessment

40. Full details of the public submissions received to the public exhibitions and the City's responses to issues raised are in **Attachment 2 - Public Submissions Summary Report.**

41. Environmental and community groups, state and Commonwealth government agencies, and the Wadawurrung Traditional Owners Aboriginal Corporation also participated in meetings and workshops during two Structured Decision-Making (SDM) processes.

42. The first SDM process was completed in 2022 to determine the initial layout of the Growth Areas as exhibited in 2023.

43. To respond to comments from the 2023 public exhibition process, and the rediscovery of the Victorian Grassland Earless Dragon, the City undertook a second SDM process in 2024 to help determine the optimal layout of the Growth Areas.

Social Equity and Sustainability

44. The Strategic Assessment Report and Plan consider social, economic and environmental drivers and they have influenced the development of the Plan and implementation documents.

45. The preparation of the plan included a structure decision making process to evaluate the performance of 10 options against these criteria and establish a conservation program that was implementable while achieving acceptable outcomes across the social, economic and environmental criteria.

Gender Equality – Gender+ Impact Assessment

46. A Gender Impact Assessment (GIA) was not undertaken for this report as it does not meet the requirements of the *Gender Equality Act 2020*.

47. The report relates purely to biodiversity conservation and management and associated regulatory approvals.

Relevant Law/Policy/Legal Implications

48. When the EPBC Plan is approved under part 10 of the *EPBC Act*, the City will be the approval holder. The City will be accountable for outcomes, commitments and measures included over the 30-year life of the program. The draft EPBC Plan includes annual and five yearly reporting to the National EPA.

49. The City is also responsible for ensuring third-parties who undertake an approved action under the endorsed Plan (including works-in-kind under the Funding Program) take these actions in accordance with the requirements of the Plan. The legislative framework also requires that third parties undertake relevant classes of action in accordance with the Plan.

50. Development is approved under Part 10 of the EPBC Act through 'classes of actions' that represent the scope of development that may be undertaken in accordance with the Plan.

51. There are five classes of actions that are included in the Plan:

51.1. Urban and commercial development.

51.2. Industrial development.

51.3. Rural development.

51.4. Supporting infrastructure and services.

51.5. Environmental management.

52. The provisions of the EPBC Act and the endorsed Plan provide the legal basis for the collection of the biodiversity levy and the implementation of the developer registration system in accordance with the Funding Program.

53. Following is the legal explanation of the legislative changes that have led to the City's recommendation that if Part 7-9 referrals aren't withdrawn from the major landholdings in Creamery Road precinct the Western Growth Area will need to be excised from the Strategic Assessment.

54. On 1 December 2025, the *Environment Protection Reform Act 2025* (Cth) (**Reform Act**) received royal assent. The Reform Act makes consequential amendments to the EPBC Act across two tranches: the first tranche took effect on 20 February 2026, and the second tranche took effect on 1 July 2026.

55. Of particular relevance is section 267 of the Reform Act, which inserted a new section 146BA into the EPBC Act with effect from 20 February 2026.

56. Section 146BA provides that despite anything in an approval under section 146B, a Part 10 approval does not apply in relation to an action where, amongst other circumstances, the action was referred to the Minister under section 68 of the EPBC Act before the Part 10 approval came into force and, immediately before the Part 10 approval was granted, either the Minister had not yet decided whether the action is a controlled action, or the Minister had not decided whether to approve the taking of the action.

57. In plain terms, the effect of section 146BA(e) is that any action that was referred to the Minister under Part 7 of the EPBC Act and in respect of which a decision on that referral had not yet been made at the time the Part 10 approval comes into force will be excluded from the operation of the Part 10 approval. Such actions will fall outside the strategic approval framework entirely, and the landholders concerned will be required to pursue their own standalone Part 9 assessment and approval processes.

58. As stated earlier in this report the majority of land in the Creamery Road precinct is subject to individual Part 7-9 referrals making implementation of a Part 10 approach impractical due to the reduction of land to collect a biodiversity levy and most critically a lack of access to land along Cowies Creek to implement conservation works and create Growling Grass Frog habitat. If part of the Western Growth Area is excised from the Strategic Assessment individual developers will have legal responsibility for their environmental approvals.

Alignment to Council Plan and Vision

59. This report aligns with the Council Plan 2025-29 strategic priority:
Core and Critical Infrastructure
Environment and Circular Economy

60. This report aligns with the Community led 30-year Vision, “Greater Geelong: A Clever and Creative Future” community aspiration:
Development and implementation of sustainable solutions.
Sustainable development that supports population growth and protects the natural environment.

Conflict of Interest

61. No officer involved in the preparation of this report declared a general or material conflict of interest.

Risk Assessment and Risk Appetite Statement

62. As a complex and major project affecting large areas of land and with a long implementation phase there are a number of risks that need to be considered.

63. The initial risk is if Council decides not to adopt the Strategic Assessment documents and seek Commonwealth approval. The City has an obligation under the Agreement with the Commonwealth to continue with the program with the current steps being undertaken in accordance with clause 5.10 as follows:

    63.1. “5.10 Following consideration of any public comments received (if any), the City of Greater Geelong will prepare, and then submit to the Environment Department for further comment: a) a copy of all public comments; b) a revised draft Strategic Assessment Report that takes into account the public comments received (if any); c) a revised draft Plan that takes into account the public comments received (if any); and d) a Supplementary Report which demonstrates how all public comments have been addressed through revisions to the draft Strategic Assessment Report or Plan (if required).”

64. If the City does not finalise the Strategic Assessment, development of the Growth Areas will be unable to proceed at least until alternative EPBC Act approval arrangements are put in place (such as individual Part 7-9 approvals). It would likely take many months or years to resolve and adequately address the complex matters at hand where biodiversity protection and management is occurring in conjunction with significant urban development. This would also mean the City has no head of power to collect a levy for implementation.

65. Council has a balanced appetite to environment and waste risks. The recommendation to adopt the Plan and seek Commonwealth approval enables environmental improvement within regulatory boundaries and taking this decision meets environmental and heritage obligations while creating measurable improvement in sustainability outcomes.

66. Council has a cautious appetite to financial risks. The recommendation to adopt the Plan and associated Funding Program commits Council to management and implementation of the Plan over a 30-year period including financial aspects. The City has approached the Funding Program and Commitments and Measures cautiously to ensure long-term financial sustainability is protected. This includes adjustments made to the documents in the lead up to and post the 2025 re-exhibition. Timeframes for implementation commitments such as land and offset acquisition have been adjusted to more realistic timings to ensure the City can manage the initial financial impact. While the cost of program is funded by development there will be a delay between the expenditure on implementing elements of the Plan and the collection of levies.

67. The recommendation to remove the Western Growth Area precincts from the Strategic Assessment within 1 month of lodging for approval with the Commonwealth, if the main landowner's part 7-9 referrals have not been withdrawn will prevent the risk of an approval of the Strategic Assessment that imposes obligations on Council that cannot be delivered.

68. It is considered the decision being recommended is affordable within Council's financial capacity and supported by credible funding and lifecycle projections. The City has significant experience with managing Development Contributions Plans which are similar to the proposed Funding Program and of a larger financial scale.

69. Over the 30-year life of the Plan the Funding Program ensures full cost recovery through a biodiversity levy collected as development occurs hence lessening structural budget pressure, unfunded liabilities, or unacceptable future cost burdens. Given the overall cost of the program and risk to the City to ensure compliance, dedicated staff resources, executive oversight and monitoring and compliance programs are included in the EPBC Plan and Funding Program.

Environmental Sustainability

70. Biodiversity assessments undertaken through the Strategic Assessment process recorded federally listed threatened species, including confirmed habitat for Golden Sun Moth, Striped Legless Lizard, a significant population of Growling Grass Frog, areas of the nationally threatened Natural Temperate Grasslands of the Victorian Volcanic Plains and potential habitat for the Victorian Grassland Earless Dragon noting the species was not recorded during recent targeted surveys (Biosis, 2024).

71. Biodiversity values which have been identified by on-ground surveys of the Growth Areas include (EHP, 2021):

    71.1. **Areas of native vegetation** - including Plains Grassland (EVC 132), Creekline Grassy Woodland (EVC 68), and Floodline riparian woodland (EVC 56).

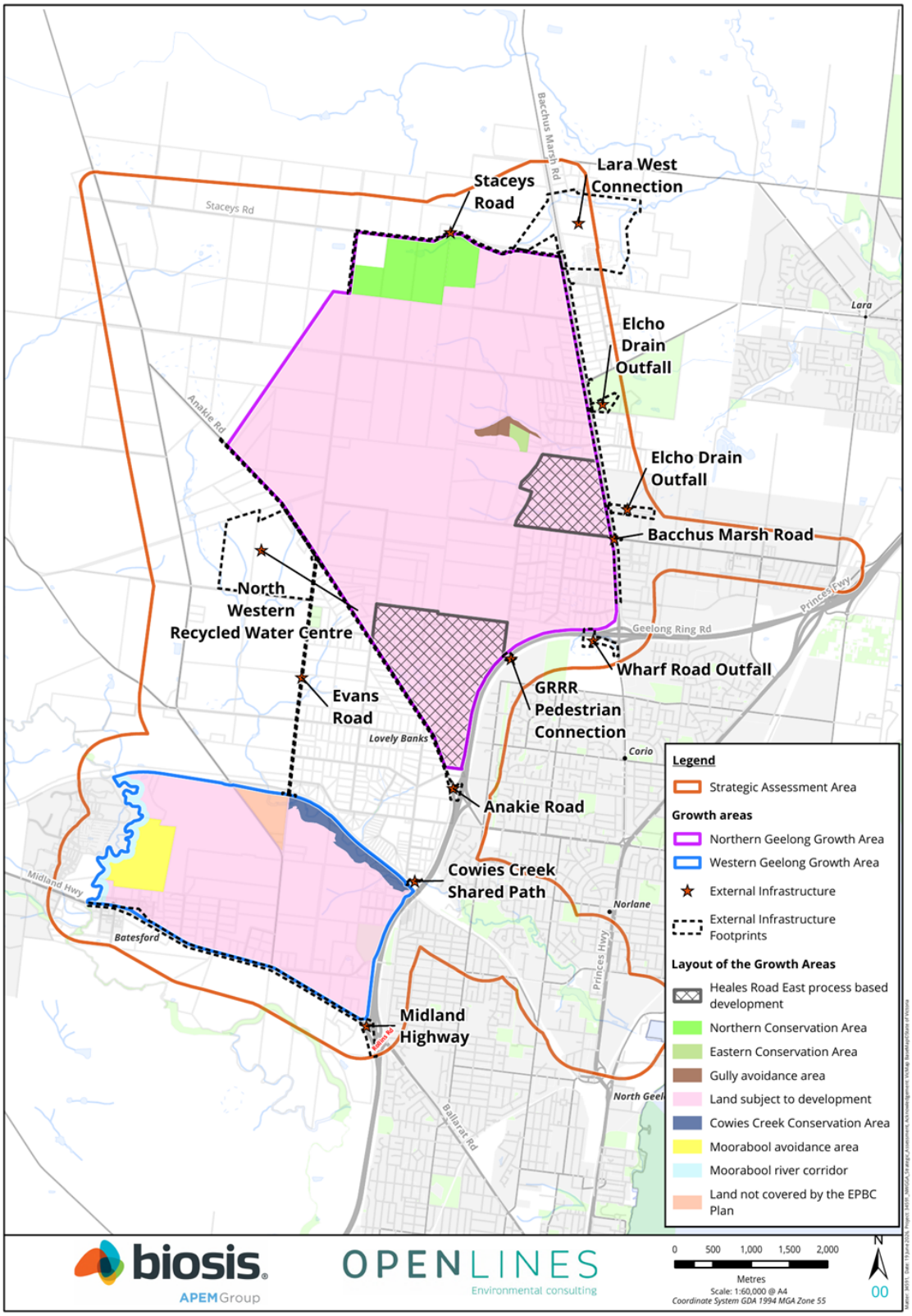
    71.2. **Threatened ecological communities** - including the Commonwealth listed Natural Temperate Grassland of the Victorian Volcanic Plain and the state significant Western (Basalt) Plains Grassland in the Northern Geelong Growth Area.

    71.3. **Threatened flora** - including the Commonwealth listed Adamson's Blown Grass (*Lachnagrostis adamsonii*) (historical records) and the state significant Leafless Bluebush (*Maireana aphylla*).

    71.4. **Threatened fauna** - including three Commonwealth listed species – the Golden Sun Moth (*Synemon plana*), Striped Legless Lizard (*Delma impar*), and Growling Grass Frog (*Ranoidea raniformis*), three state significant species - Hardhead (*Aythya australis*), Fat-tailed Dunnart (*Sminthopsis crassicaudata*), and Tussock Skink (*Pseudemoia pagenstecheri*), and an active Platypus burrow within the Moorabool River. There is also potential habitat for the Victorian Grassland Earless Dragon noting the species was not recorded during recent targeted surveys (Biosis, 2024).

    71.5. **Waterways** - including the Moorabool River and Cowies Creek which provide known and potential habitat for a range of fauna species.

72. The strategic assessment process identified four strategic conservation areas and two avoidance areas to be protected from development under the EPBC Plan. These are shown on the plan below.



Attachments

1. Attachment 1 – NWGGA Strategic Assessment Summary Report July 2026 [**2.4.1** - 13 pages]
2. Attachment 2 – NWGGA Public Submissions Summary Report July 2026 [**2.4.2** - 76 pages]
3. Attachment 3 - NWGGA Environment Protection & Biodiversity Conservation Plan July 2026 [**2.4.3** - 91 pages]
4. Attachment 4 – NWGGA Commitments and Measures July 2026 [**2.4.4** - 60 pages]
5. Attachment 5 – NWGGA Biodiversity Conservation Strategy July 2026 [**2.4.5** - 86 pages]
6. Attachment 6 - NWGGA Strategic Assessment Funding Program July 2026 [**2.4.6** - 40 pages]

THE CITY OF
GREATER GEELONG

NORTHERN AND WESTERN GEELONG GROWTH AREAS

STRATEGIC ASSESSMENT SUMMARY REPORT

JULY 2026

CITY OF GREATER GEELONG

ACKNOWLEDGEMENT OF COUNTRY

Greater Geelong is located on the traditional lands of the Wadawurrung people. The land was created by the great ancestor spirit, Bunjil, the wedge-tailed eagle. Wadawurrung territory extends from the great dividing range in the north to the coast around Port Phillip Bay.

The city acknowledges the Wadawurrung people as the traditional owners of this land who to this day practice their culture and uphold the dignity of their ancestors.

DOCUMENT TRACKING

This document was prepared on behalf of the City of Greater Geelong by Biosis and Open Lines.

PREPARED BY:	
Heather Tolley, Peter Hemphill, Heidi Birkby (Open Lines)	
REVIEWED BY:	
Heather Tolley, Peter Hemphill (Open Lines) Mitchell Deaves (Biosis)	
VERSION CONTROL:	
VERSION:	Final
DATE:	July 2026

Contents

1 WHAT IS THE STRATEGIC ASSESSMENT AND WHY IS IT BEING UNDERTAKEN? 1

1.1 Background to the Strategic Assessment 1

1.2 Key social and environmental values of the Growth Areas 1

1.3 The current status of the project 3

2 WHAT ARE THE KEY DOCUMENTS? 3

2.1 Overview 3

2.2 The NWGGA EPBC Plan 4

2.3 The Strategic Assessment Report 4

2.4 The Commitments and Measures 4

2.5 The Biodiversity Conservation Strategy 4

2.6 The Funding Program 4

3 WHAT DEVELOPMENT IS ALLOWED FOR UNDER THE PLAN? 5

3.1 Types of development under the Plan 5

3.2 Location of development 5

4 WHAT IS THE CONSERVATION PROGRAM? 5

4.1 Purpose of the conservation program 5

4.2 Offset mitigation hierarchy 5

5 WHAT ASSURANCE IS THERE THAT THE PLAN WILL BE DELIVERED SUCCESSFULLY? 8

6 WHAT ARE THE KEY FINDINGS OF THE STRATEGIC ASSESSMENT REPORT? 8

6.1 Purpose of the Strategic Assessment Report 8

6.2 Biodiversity values at risk of direct impacts under the Plan 8

6.3 Biodiversity values at risk of potential indirect impacts under the Plan 9

6.4 Evaluation of the adequacy of the Plan 9

REFERENCES 10

List of Figures

Figure 1: Location of the strategic assessment 2

Figure 2: Strategic assessment documents 3

Figure 3: Location of development under the Plan 7

The purpose of this document is to provide the community and other stakeholders with a summary of the Northern and Western Geelong Growth Areas (NWGGA) Strategic Assessment. It provides a brief overview of the background and context, the key documents, and the main components of the strategic assessment.

1 What is the Strategic Assessment and why is it being undertaken?

1.1 BACKGROUND TO THE STRATEGIC ASSESSMENT

The City of Greater Geelong (the City) has identified two areas for urban growth near the centre of Geelong. These areas are known as the Northern and Western Geelong Growth Areas (the Growth Areas) (see Figure 1). The Growth Areas were identified to support the long-term growth of Geelong over the coming decades (Geelong Region Alliance, 2007; The City of Greater Geelong, 2021). The City prepared the *Northern and Western Geelong Growth Areas Framework Plan* which identifies these areas for urban development until 2047.

The development of the Growth Areas will lead to impacts to various biodiversity values which are protected under the Commonwealth *Environment Protection and Biodiversity Conservation Act* (EPBC Act) and Victorian state biodiversity regulations.

The City has undertaken a strategic assessment under Part 10 of the EPBC Act to support the development of the Growth Areas while protecting matters of national environmental significance (MNES). The strategic assessment provides landscape scale assessment and approval of development under the EPBC Act, and the opportunity to deliver improved environmental and developmental outcomes.

1.2 KEY SOCIAL AND ENVIRONMENTAL VALUES OF THE GROWTH AREAS

The traditional owners of the country now known as Geelong are the Wadawurrung Aboriginal people, meaning "the people who belong to the water". The Wadawurrung people are a recognised tribe comprising 25 clans (family groups) which form part of the larger Kulin Nation of Aboriginal people (Rowe, 2021).

Today, the land relevant to the strategic assessment (the 'Strategic Assessment Area', see Figure 1) has mostly been developed for agricultural purposes. As a result, the condition of the environment of the Growth Areas varies. Most of the area has been impacted by agricultural land use, is highly modified, and dominated by weeds. Areas of native vegetation do occur, though are limited to riparian corridors and areas which have not been subject to cropping (EHP, 2021).

Despite this, the Growth Areas continue to support a number of biodiversity values which have not been impacted by historical disturbance. Biodiversity values which have been identified by on-ground surveys of the Growth Areas include (EHP, 2021):

- **Areas of native vegetation** - including Plains Grassland (EVC 132), Creekline Grassy Woodland (EVC 68), and Floodline riparian woodland (EVC 56)
- **Threatened ecological communities** - including the Commonwealth listed Natural Temperate Grassland of the Victorian Volcanic Plain and the state significant Western (Basalt) Plains Grassland in the Northern Geelong Growth Area
- **Threatened flora** - including the Commonwealth listed Adamson's Blown Grass (*Lachnagrostis adamsonii*) (historical records) and the state significant Leafless Bluebush (*Maireana aphylla*)
- **Threatened fauna** - including three Commonwealth listed species – the Golden Sun Moth (*Synemon plana*), Striped Legless Lizard (*Delma impar*), and Growling Grass Frog (*Ranoidea raniformis*), three state significant species - Hardhead (*Aythya australis*), Fat-tailed Dunnart (*Sminthopsis crassicaudata*), and Tussock Skink (*Pseudemoia pagenstecheri*), and an active Platypus burrow within the Moorabool River
- **Waterways** - including the Moorabool River and Cowies Creek which provide known and potential habitat for a range of fauna species

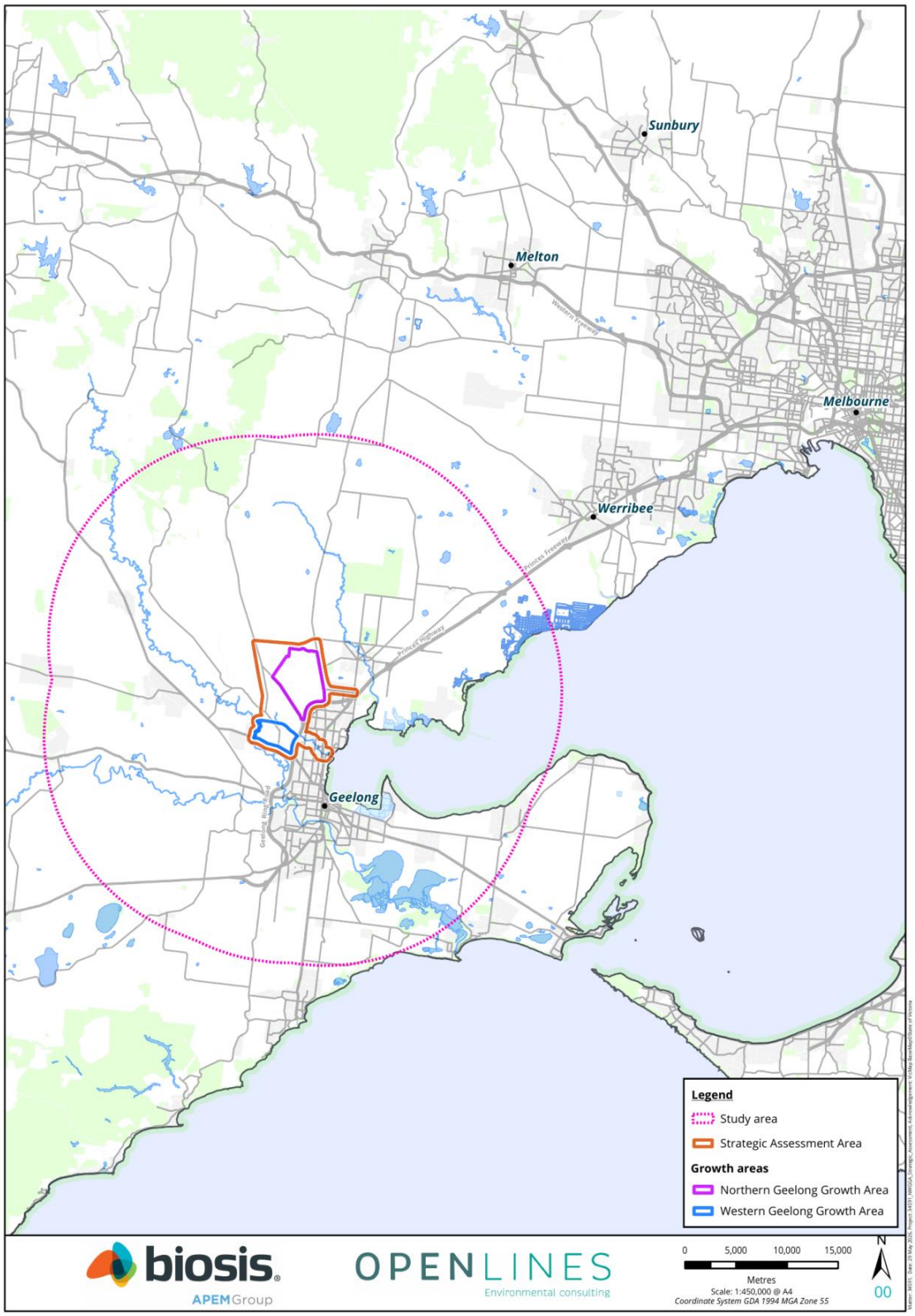


Figure 1: Location of the strategic assessment

1.3 THE CURRENT STATUS OF THE PROJECT

This package presents the final Strategic Assessment documents prepared for submission to the Commonwealth Minister for the Environment.

The package has undergone two rounds of public exhibition - the first from 26 July 2023 to 25 September 2023, and the second from 6 November 2025 to 8 December 2025. These exhibition periods provided an opportunity for the community and other stakeholders to provide feedback on the documents through formal submissions.

All public submissions have been reviewed and addressed as part of finalising the Strategic Assessment, with outcomes documented in the *NWGGA Public Submissions Summary Report*. The document package has been updated accordingly and is presented here in its final form.

2 What are the key documents?

2.1 OVERVIEW

The Northern and Western Geelong Growth Areas EPBC Plan (the Plan) is the key document which will manage impacts to protected biodiversity values and facilitate development of the Growth Areas through approval under Part 10 of the EPBC Act. The Plan is supported by the following documents:

- The Strategic Assessment Report (SAR)
- Three implementation documents:
  - The Northern and Western Geelong Growth Areas Commitments and Measures
  - The Northern and Western Geelong Growth Areas Biodiversity Conservation Strategy (BCS)
  - The Northern and Western Geelong Growth Areas Funding Program

Figure 2 shows the relationship between the documents and the strategic assessment. A brief description of these documents is provided below.

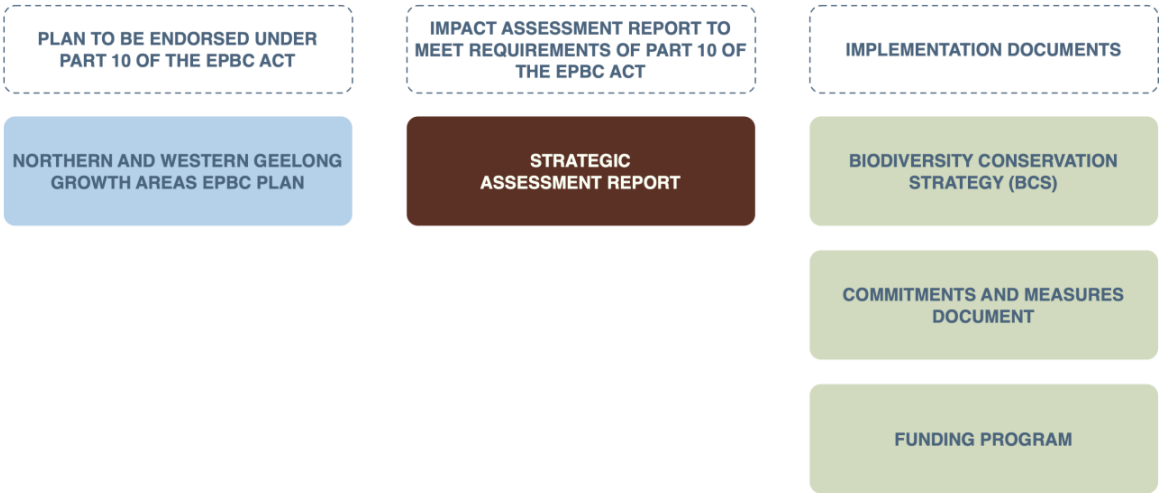


Figure 2: Strategic assessment documents

2.2 THE NWGGA EPBC PLAN

The purpose of the Plan is to ensure development protects MNES and proceeds in accordance with the requirements of the EPBC Act. The Plan will facilitate the growth of Geelong by streamlining approvals under the EPBC Act and ensuring that implementation is cost efficient for both development and conservation.

The Plan was prepared in accordance with the Endorsement Criteria in the Strategic Assessment Agreement between the Commonwealth Minister for the Environment and the City. Its overarching objective is to:

> *"Provide for the protection of matters of national environmental significance while supporting the delivery of the Northern and Western Geelong Growth Areas Framework Plan and its objectives"*

The Plan includes ten environmental and socio-economic outcomes that need to be fulfilled in order to achieve the overall objective. It also includes a range of commitments for the City to undertake actions to address impacts on MNES. Following endorsement under Part 10 of the EPBC Act, the City will be responsible for implementing these commitments over the life of the Plan.

2.3 THE STRATEGIC ASSESSMENT REPORT

The Strategic Assessment Report (SAR) has been prepared to assess the impacts of development under the Plan on biodiversity values listed under the EPBC Act (MNES). The SAR evaluates the adequacy of the Plan's outcomes and commitments in protecting MNES.

The SAR was prepared in accordance with the Terms of Reference for the strategic assessment provided under the Strategic Assessment Agreement.

2.4 THE COMMITMENTS AND MEASURES

The commitments and measures provide the mechanism through which the Plan's objective and outcomes will be achieved. Once the Plan is endorsed under Part 10 of the EPBC Act, changes to the outcomes and commitments can only be made with endorsement from the Minister in accordance with Part 10, Subdivision BA of the EPBC Act. The measures provide key details for the responsibility, support partners, and timing for implementation of the commitments.

2.5 THE BIODIVERSITY CONSERVATION STRATEGY

The BCS is an implementation document which responds to the requirements of the EPBC Act, and State biodiversity policy. The purpose of the BCS is to:

- Identify the national, state and local biodiversity values that are present in the Strategic Assessment Area and set out a conservation program for providing genuine, long-term positive results for those biodiversity values
- Set out how the conservation elements of the EPBC Plan for the Strategic Assessment Area will be implemented including through avoiding and minimising, mitigating, and offsetting residual impacts in accordance with the mitigation hierarchy (DSEWPC, 2012; DELWP, 2017)
- Guide the preparation of Precinct Structure Plans (PSPs) and subsequent development within the Strategic Assessment Area to ensure the outcomes are consistent with State biodiversity policy

2.6 THE FUNDING PROGRAM

The funding program sets out how the Plan will be funded. Key components which require funding include:

- The delivery of offsets
- Securing and managing conservation areas
- Implementing conservation measures, the adaptive management process, and compliance program

3 What development is allowed for under the Plan?

3.1 TYPES OF DEVELOPMENT UNDER THE PLAN

The types of development to be approved under the Plan are defined through a set of 'classes of actions'. There are five classes of actions which will be allowed for under the Plan:

- Urban and commercial development
- Industrial development
- Rural development
- Supporting infrastructure and services
- Environmental management

Each class of actions includes a number of broad 'development types' which relate to a set of 'impact activities' (mostly defined in the *Victoria planning provisions*) that may be undertaken. The impact activities provide an understanding of the specific actions within the scope of the classes of actions.

3.2 LOCATION OF DEVELOPMENT

Development under the Plan can occur within the following areas:

- 'Land Subject to development' within the Growth Areas (see Figure 3). It is noted that development within a portion of the Heales Road East precinct (which forms part of the 'land subject to development') is subject to a specific process, described in Chapter 6 of the Plan
- External infrastructure development areas outside of the Growth Areas within the Strategic Assessment Area (see Figure 3)
- The avoided areas in the Growth Areas (only certain types of actions (e.g. environmental management) where the activities are complementary to the biodiversity values of the area)

4 What is the conservation program?

4.1 PURPOSE OF THE CONSERVATION PROGRAM

The key purpose of the conservation program is to:

- Ensure that development adequately avoids and minimises impacts to state and Commonwealth biodiversity values in accordance with the EPBC Act and State biodiversity policy and that any impacts which cannot be avoided are appropriately mitigated and offset
- Ensure biodiversity outcomes of the BCS, and the objective and outcomes of the Plan are achieved

The conservation program was developed in accordance with the offset mitigation hierarchy. An overview of the offset mitigation hierarchy, and how it applies to the conservation program is provided below.

4.2 OFFSET MITIGATION HIERARCHY

The offset mitigation hierarchy requires impacts to biodiversity to first be avoided and minimised, then mitigated. Any unavoidable residual impacts require offsets. An overview of the conservation program in relation to these three steps is provided below.

4.2.1 AVOIDANCE AND MINIMISATION OF IMPACTS

The conservation program provides for a strategic planning process to balance the environmental and socio-economic values of land within the Growth Areas. This process led to the identification of three categories of biodiversity areas which provide opportunities to avoid and minimise impacts to biodiversity values. These areas include:

- Strategic conservation areas which represent the most important locations for the protection, management and restoration of biodiversity values
- Avoidance areas which represent areas supporting biodiversity values which may not be appropriate for formal protection and management as an offset under the Plan
- Landscape connections which represent locations that are primarily used for another purpose (e.g., to manage stormwater) but that may provide opportunities for providing co-benefits for biodiversity

The strategic planning process identified four strategic conservation areas and two avoidance areas to be protected from development under the EPBC Plan (see Figure 3).

4.2.2 MITIGATION OF INDIRECT IMPACTS

The conservation program provides a range of state and Commonwealth level commitments to mitigate potential indirect impacts associated with the Plan. These indirect impacts relate to:

- Altered fire regimes
- Changes to water flows and water quality
- Disturbance due to noise, dust, or light
- Disturbance from increased public access to natural areas
- Fauna mortality and barriers to movement
- Inadvertent impacts on adjacent habitat or vegetation
- Predation or competition by pest or domestic fauna
- Spread of infection or disease
- Spread of weeds

Mitigation measures under the Plan fall under two broad categories:

- Standard mitigation measures and processes which will be implemented through the existing Victorian planning system and the Geelong Planning Scheme to mitigate the indirect impacts
- Additional specific mitigation measures provided for under the Plan to address particular vulnerabilities or risks to MNES from indirect impacts

Any potential indirect impacts to state significant biodiversity values will be assessed under the planning permit process when development is proposed.

4.2.3 OFFSETS

The final component of the conservation program is offsets to compensate for residual impacts to biodiversity values. The conservation program addresses both Commonwealth and state offsets. Noting that the state and Commonwealth offsets will be delivered separately due to restrictions in offset site locations and availability.

The Commonwealth offset package provides offsets for four MNES (Golden Sun Moth, Striped Legless Lizard, Victorian Grassland Earless Dragon, and Natural Temperate Grassland) which occur within the Northern Geelong Growth Area. These offsets will be delivered through a strategic offsets package which intends to provide substantially better results than what would be achieved through standard project-by-project approvals.

The state offset package involves offsets for impacts to areas of native vegetation as required by the *Guidelines for the removal, destruction or lopping of native vegetation.*

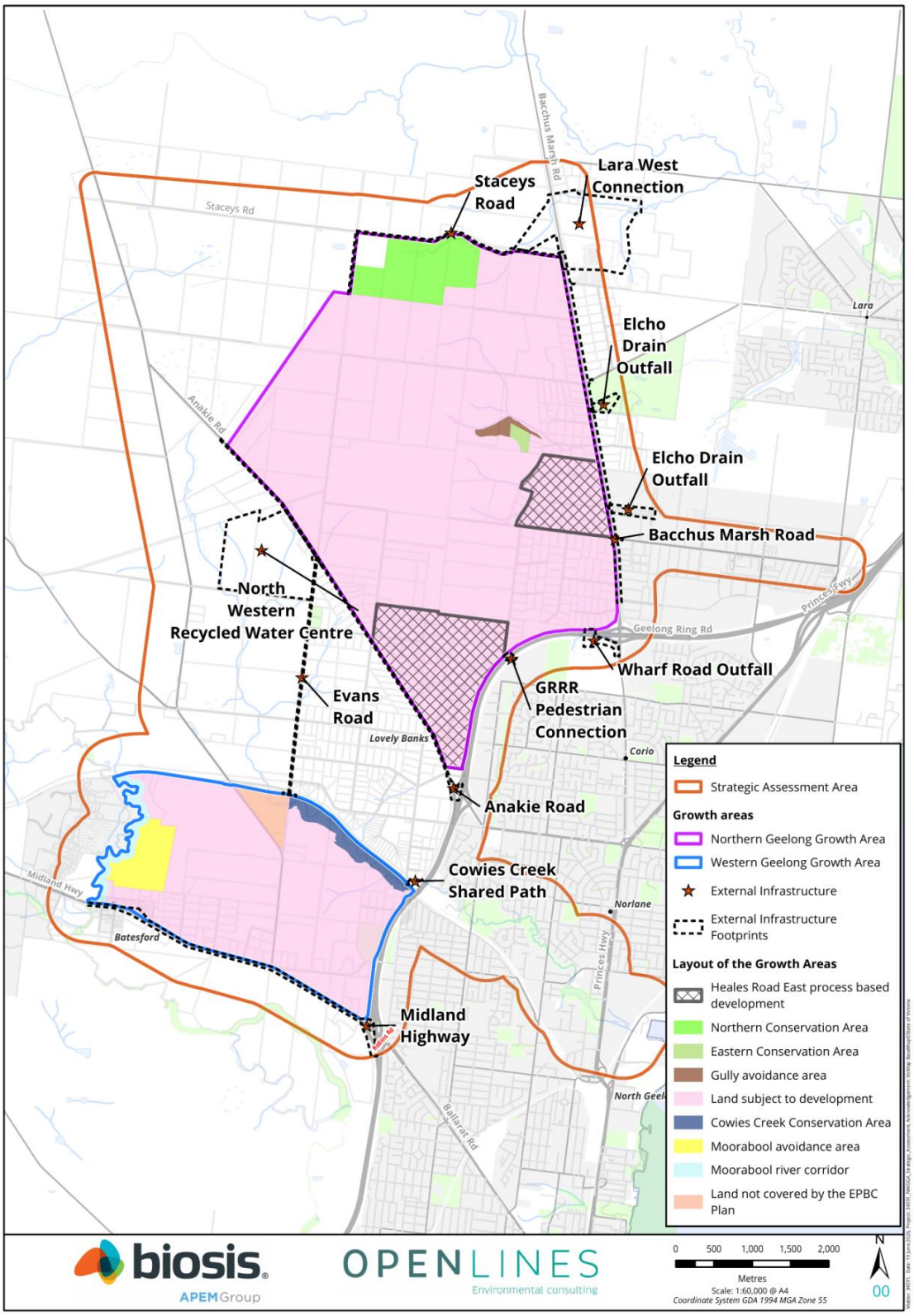


Figure 3: Location of development under the Plan

5 What assurance is there that the Plan will be delivered successfully?

A key component of the Plan are the processes to ensure successful delivery. The Plan includes an 'assurance and implementation framework' which will ensure that the Plan complies with Commonwealth approval conditions, the conservation program is efficiently and effectively delivered, and the implementation processes are transparent and accountable.

The key elements of the assurance and implementation framework include:

- A strong set of governance arrangements to support the delivery of commitments and measures
- A funding program established by the EPBC Plan to implement the Commonwealth level commitments and measures, and funding through PSP and development processes to implement state level commitments and measures
- Implementation of a monitoring, evaluation, reporting and improvement (MERI) program to understand if outcomes and commitments are being achieved, outline communication points with stakeholders, and the process to adapt measures as necessary
- A compliance program to ensure that commitments and measures relating to third parties are implemented appropriately

6 What are the key findings of the Strategic Assessment Report?

6.1 PURPOSE OF THE STRATEGIC ASSESSMENT REPORT

The SAR provides an assessment of the potential impacts of development under the Plan and evaluates the adequacy of the commitments and measures in protecting MNES. The SAR considered potential impacts to 33 MNES. These include:

- Two threatened flora species
- 26 threatened fauna species
- One threatened ecological community
- One Ramsar wetland
- Three migratory species not listed as threatened

The SAR also provides a cumulative impact assessment to consider development under the Plan in the context of other projects, and a socio-economic impact assessment.

A brief overview of the key biodiversity values at risk of direct impacts and potential indirect impacts under the Plan, and a summary of the evaluation of the adequacy of the Plan is provided below.

6.2 BIODIVERSITY VALUES AT RISK OF DIRECT IMPACTS UNDER THE PLAN

The SAR has identified seven MNES subject to potential direct impacts under the Plan including:

- Blue-Winged Parrot (*Neophema chrysostoma*)
- Glossy Grass Skink (*Pseudemoia rawlinsoni*)
- Golden Sun Moth (*Synemon plana*)
- Growling Grass Frog (*Ranoidea raniformis*)
- Striped Legless Lizard (*Delma impar*)
- Victorian Grassland Earless Dragon (*Tympanocryptis pinguicolla*), noting the species was not recorded during recent targeted surveys (Biosis, 2024)
- Natural Temperate Grassland of the Victorian Volcanic Plain

The Plan provides three strategic conservation areas and one avoidance area which protect habitat for these values. This includes the:

- Cowies Creek Conservation Area, which protects an important population of Growling Grass Frog, and potential habitat for Glossy Grass Skink
- Northern Conservation Area, which retains and protects a large, contiguous area of grassland that provides known habitat for Golden Sun Moth and Striped Legless Lizard, and potentially suitable areas for Victorian Grassland Earless Dragon and Blue-Winged Parrot
- Eastern Conservation Area, which will protect and manage part of the largest patch of Natural Temperate Grassland within the Growth Areas
- Gully avoidance area, which will protect habitat for Striped Legless Lizard and Golden Sun Moth, and areas of mapped Natural Temperate Grassland

There will be residual adverse direct impacts on Golden Sun Moth, Striped Legless Lizard, Victorian Grassland Earless Dragon, and Natural Temperate Grassland which are accounted for in the EPBC offsets package. There will be no residual adverse direct impacts to Blue-Winged Parrot, Glossy Grass Skink, or Growling Grass Frog.

6.3 BIODIVERSITY VALUES AT RISK OF POTENTIAL INDIRECT IMPACTS UNDER THE PLAN

Development under the Plan has the potential to result in indirect impacts to Growling Grass Frog and potential habitat for Glossy Grass Skink within and downstream of the Western Geelong Growth Area. The Cowies Creek Conservation Area will protect and restore habitat for both species, and the Plan also provides commitments and measures for additional conservation actions downstream of the Western Geelong Growth Area for Growling Grass Frog.

There may also be indirect impacts to the following biodiversity values:

- Parts of the Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar site which occur downstream from the Growth Areas, and the threatened and migratory birds which use these areas
- Three fish species which may in future use habitat in the Moorabool River
- Areas of native and non-native grassland in the Northern Geelong Growth Area and the associated MNES (Striped Legless Lizard, Golden Sun Moth, Victorian Grassland Earless Dragon, Natural Temperate Grassland)

The commitments and measures included in the Plan provide for a range of both specific and standard mitigation measures for MNES which are considered appropriate to address potential indirect impacts on biodiversity values.

6.4 EVALUATION OF THE ADEQUACY OF THE PLAN

Part 5 of the SAR provides an evaluation of the Plan against the principles of ecologically sustainable development, and the evaluation requirements of the Terms of Reference. The key findings of the evaluation are that the Plan:

- Is consistent with the principles of ecologically sustainable development
- Includes commitments that:
  - Achieve substantial avoidance of impacts to MNES
  - Adequately mitigate the potential indirect impacts of development
  - Will lead to the protection and management of significant areas of land as part of a strategic approach to both avoidance and offsets
- Incorporates a robust assurance and implementation framework to ensure that the outcomes and commitments are delivered successfully

References

Biosis (2024) 'Victorian Grassland Earless Dragon, targeted surveys, and habitat suitability assessment - Geelong Growth Areas'.

DELWP (2017) 'Guidelines for the removal, destruction or lopping of native vegetation'.

DSEWPC (2012) 'Environment Protection and Biodiversity Conservation Act 1999 Environmental Offsets Policy'.

EHP (2021) 'Existing Ecological Conditions: Northern and Western Geelong Growth Areas'. Prepared for the City of Greater Geelong.

Geelong Region Alliance (2007) 'The Geelong Region Plan'. G21 Geelong Region Alliance.

Rowe, D. (2021) 'About Corayo: A Thematic History of Greater Geelong'. The City of Greater Geelong.

The City of Greater Geelong (2021) 'The Northern and Western Geelong Growth Areas Framework Plan.'

THE CITY OF
GREATER GEELONG

NORTHERN AND WESTERN GEELONG GROWTH AREAS

PUBLIC SUBMISSIONS SUMMARY REPORT

JULY 2026

CITY OF GREATER GEELONG

Document tracking	
Prepared by:	
Heidi Birkby	
Reviewed by:	
Peter Smith, Peter Hemphill	
Version control:	
Version	Final
Date:	July 2026

Table of contents

1 INTRODUCTION AND CONTEXT 1

1.1 Background to the strategic assessment 1

1.2 The strategic assessment documents 1

1.3 This report 1

2 OVERVIEW OF THE PUBLIC EXHIBITION PROCESSES 3

2.1 First round of public exhibition 3

2.2 Need for re-exhibition 3

2.3 Second round of public exhibition 3

3 SUBMITTERS 5

4 KEY THEMES AND RESPONSES 7

4.1 Introduction 7

4.2 Strategic assessment process and plan design 8

4.3 Northern Geelong Growth Area 24

4.4 Western Geelong Growth Area 28

4.5 Plan implementation 38

4.6 Other miscellaneous comments 52

REFERENCES 73

1 Introduction and context

1.1 BACKGROUND TO THE STRATEGIC ASSESSMENT

The City of Greater Geelong (the City) has identified two areas for urban growth near the centre of Geelong. These areas are known as the Northern and Western Geelong Growth Areas (the Growth Areas). The Growth Areas were identified to support the long-term growth of Geelong over the coming decades (Geelong Region Alliance, 2007; The City of Greater Geelong, 2021). The City prepared the *Northern and Western Geelong Growth Areas Framework Plan* which identifies these areas for urban development until 2047.

The development of the Growth Areas will lead to impacts to various biodiversity values which are protected under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) and Victorian state biodiversity regulations.

The City has undertaken a strategic assessment under Part 10 of the EPBC Act to support the development of the Growth Areas while protecting matters of national environmental significance (MNES). The strategic assessment provides landscape scale assessment and approval of development under the EPBC Act, and the opportunity to deliver improved environmental and developmental outcomes.

1.2 THE STRATEGIC ASSESSMENT DOCUMENTS

There are six key documents that form part of the strategic assessment package. They are:

- The *Northern and Western Geelong Growth Areas EPBC Plan* (the Plan) which will be submitted to the Commonwealth for endorsement under Part 10 of the EPBC Act. The Plan:
  - Describes the development (classes of actions) for which approval is being sought under the EPBC Act
  - Sets out an objective, and a series of outcomes and commitments to define what the Plan will achieve
  - Sets out a conservation framework to address the impacts of the development on MNES, including through avoiding and minimising, mitigating, and offsetting residual impacts
  - Sets out an assurance and implementation framework to implement the Plan
- Three implementation documents which support the Plan but do not form part of the Plan to be endorsed by the Commonwealth under Part 10 of the EPBC Act. They are:
  - The *Northern and Western Geelong Growth Areas Commitments and Measures* document which sets out the detailed measures (or activities) that will be implemented to deliver the Plan's commitments
  - The *Northern and Western Geelong Growth Areas Biodiversity Conservation Strategy* (BCS) which:
    - Sets out in more detail how the conservation elements of the Plan will be implemented
    - Guides the preparation of Precinct Structure Plans (PSPs) and subsequent development within the Strategic Assessment Area to ensure the outcomes are consistent with State biodiversity policy
  - The *Northern and Western Geelong Growth Areas Funding Program* which sets out how the Plan's funding framework will be implemented
- The *Northern and Western Geelong Growth Areas Strategic Assessment Report* (SAR) which provides the formal assessment of the impacts of development under the Plan on MNES. The SAR also evaluates the adequacy of the Plan's outcomes and commitments in protecting MNES over the life of the Plan. The SAR is supported by a number of Supporting Documents
- The *Northern and Western Geelong Growth Areas Strategic Summary Report* which provides the community and other stakeholders with a summary of the Northern and Western Geelong Growth Areas (NWGGA) Strategic Assessment

1.3 THIS REPORT

This report provides a summary of public comments received through the formal public exhibition processes of the strategic assessment, and details how public comments have been addressed in revising the document package.

Public exhibition for a Part 10 strategic assessment is the formal period where draft documents are released for public review and comment under the EPBC Act. Submissions are considered and may lead to changes before the assessment is finalised and approved. The requirements for public exhibition are detailed in the Strategic Assessment Agreement.

This report provides the following:

- An overview of the public exhibition processes for the strategic assessment process
- Key themes from public comments and how these themes have been responded to

2 Overview of the public exhibition processes

The strategic assessment was first publicly exhibited in 2023. Due to further detailed work on the project and notable revision of the documents, the strategic assessment was exhibited for a second round of public exhibition in 2025. This section provides a summary of the:

- First round of public exhibition
- Need for re-exhibition
- Second round of public exhibition

2.1 FIRST ROUND OF PUBLIC EXHIBITION

The strategic assessment documentation package was publicly exhibited for a period of two months from 26th July 2023 to 25th September 2023 to provide an opportunity for the community and other stakeholders to provide feedback on the documents through formal submissions. The 2023 document package can be accessed here.

Over 45 formal submissions were received during this period. These submissions were reviewed by the City, and were considered in revising the EPBC Plan, Strategic Assessment Report, and the other relevant strategic assessment documents.

The City held a number of online workshops during public exhibition, providing stakeholders with an opportunity to ask questions or provide verbal feedback. In person drop in sessions were also available.

Key themes or issues raised throughout submissions are summarised below in Section 4.

2.2 NEED FOR RE-EXHIBITION

As discussed, the strategic assessment documentation package was re-exhibited in 2025. The Strategic Assessment Agreement states that:

> *"If, following consideration of any public comments received, either of the Parties is of the view that significant amendments (i.e. material and substantial amendments) to the draft Plan or draft Strategic Assessment Report are required, either of the Parties may elect to re-advertise the draft Plan and draft Strategic Assessment Report"*

The City with the support of the Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW) decided to re-exhibit the strategic assessment documents. The key reason behind this decision was the rediscovery of the Victorian Grassland Earless Dragon (VGED) (*Tympanocryptis pinguicolla*) in Victoria combined with the need to amend the EPBC Plan in response to previous public comments from the 2023 public exhibition.

Detailed work on the VGED for the strategic assessment was undertaken during 2023 and 2024. This involved:

- Targeted surveys and detailed habitat attribute analysis (see Supporting Document A to the SAR)
- Habitat attribute analysis (see Supporting Document B to the SAR)

Following this work on the VGED, a detailed avoidance planning process was undertaken for the project in 2024 (see Supporting Document C to the SAR). This process considered both the information collected during the VGED survey program and habitat attribute analysis, and feedback from the first round of public exhibition.

The work completed on VGED and the revised avoidance process were deemed to be material and substantial amendments to the strategic assessment documentation package, and it was considered appropriate to re-exhibit the revised documents in 2025.

2.3 SECOND ROUND OF PUBLIC EXHIBITION

The revised strategic assessment documentation package was re-exhibited for one month from 6th November 2025 to 8th December 2025. The 2025 document package can be accessed here.

There were 17 formal submissions provided on the revised document package. A summary of the key themes of these submissions is provided in Section 4. The City also facilitated a number of workshops with key stakeholders during the re-exhibition period.

3 Submitters

There are a number of stakeholders who responded to one or both of the public exhibition processes. Broadly, these stakeholders include:

- Wadawurrung Traditional Owners Aboriginal Corporation
- Landholders and developers
- Regulators
- Current and future residents of Geelong
- Environment and community groups and organisations

Table 1 provides a detailed list of submitters from the first and second exhibition periods. Note that government agencies, companies, and stakeholder organisations are identified by name. For privacy reasons, individual submitters are identified by a number rather than their name.

Table 1: Detailed list of submitters

Submitter	2023 submission	2025 submission
Individual - submitter 1	✓	
Individual - submitter 2	✓	
Koala Clancy Foundation	✓	
North West Alliance	✓	✓
Victorian Volcanic Plain Biosphere Inc.	✓	
Friends of Bannockburn Bush	✓	
Individual - submitter 7	✓	
Geelong Landcare Network Inc.	✓	
Individual - submitter 9	✓	
Individual - submitter 10	✓	
Individual - submitter 11	✓	
Individual - submitter 12	✓	
Individual - submitter 13	✓	
Individual - submitter 14	✓	
Lovely Banks Development Group	✓	✓
Individual - submitter 16	✓	
Individual - submitter 17	✓	
Batesford, Fyansford, Stonehaven Landcare Group	✓	✓
Individual - submitter 19	✓	
Individual - submitter 20	✓	
Individual - submitter 21	✓	
Individual - submitter 22	✓	
Individual - submitter 23	✓	
Individual - submitter 24	✓	
Individual - submitter 25	✓	

Submitter	2023 submission	2025 submission
Growland	✓	✓
DEECA	✓	✓
Geelong Field Naturalists Club	✓	✓
Villawood	✓	✓
National Trust Submission	✓	
People for a Living Moorabool	✓	✓
Individual - submitter 32	✓	
Bisinella Developments	✓	✓
Individual - submitter 34	✓	✓
Friends of Cowies Creek	✓	
Individual - submitter 36	✓	
Landholder of 135 Staceys Road	✓	✓
Barwon Water	✓	✓
Individual - submitter 39	✓	
Individual - submitter 40	✓	
Individual - submitter 41	✓	
Friends of the Barwon	✓	
Individual - submitter 43	✓	
Individual - submitter 44	✓	
Tango Property Group on behalf of YIH-Sheng Investments	✓	
Corangamite Catchment Management Authority	✓	
Cool Geelong		✓
Individual - submitter 5		✓
Landowner of 225 and 195 Staceys Road, 2025		✓
Individual - submitter 11, 2025		✓
SIG Group		✓

4 Key themes and responses

4.1 INTRODUCTION

To help analyse and respond to the submissions from both the 2023 and 2025 exhibition processes, the submissions were reviewed in detail and grouped into themes and sub-themes (see Table 2). The themes represent common high level issues that were raised by submitters and the sub-themes address the more detailed issues within each theme.

For each theme and sub-theme, the following sections of the report provide a summary of the issues raised and includes a representative set of quotes from submitters. A detailed response is then provided which sets out how the comments have been addressed in the revision of the strategic assessment documents.

It should be noted that there is some overlap and repetition across the themes and sub-themes which is necessary to comprehensively respond to the two exhibition processes and address the range of issues raised.

Table 2: Themes and sub-themes from public comment submissions

Theme	Sub-theme
Strategic assessment process and plan design	
Further avoidance of biodiversity values	-
Survey effort / access	-
Compliance for destruction of known MNES values	-
Landscape connection / opportunity areas in the BCS	-
External infrastructure	-
Other comments on Plan design	-
Northern Geelong Growth Area	
Northern Conservation Area	Properties included in the conservation area
	Avoidance area C
	Value of the Northern Conservation Area for Victorian Grassland Earless Dragon
Eastern Conservation Area	-
Protection of the Gully avoidance area	-
Western Geelong Growth Area	
Moorabool River Corridor and Moorabool Avoidance Area	Width of the riparian corridor
	Location of stormwater infrastructure
	Artificial river diversion
	Status of the Moorabool River corridor
	Status of the Moorabool avoidance area
Cowies Creek and Growling Grass Frog	Boundary / width of the conservation area
	Protection of the tributary
	Public access
	Other comments on Cowies Creek

Theme	Sub-theme
Plan implementation	
Land acquisition timeline	-
Interim management of biodiversity values	-
Boundaries of the conservation areas	-
Funding program	Land acquisition costs
	Components of the biodiversity levy
	Cost of the levy
	Changes to the levy
Other comments on Plan implementation	-
Other miscellaneous comments	

4.2 STRATEGIC ASSESSMENT PROCESS AND PLAN DESIGN

4.2.1 FURTHER AVOIDANCE OF BIODIVERSITY VALUES

SUMMARY OF FEEDBACK

The level of avoidance of biodiversity values within the Growth Areas, particularly the Northern Geelong Growth Area (NGGA), is of high importance to the Geelong community. A number of submissions from the 2023 exhibition called for further avoidance of impacts to biodiversity. Submissions generally expressed that further avoidance was important for:

- Known Striped Legless Lizard (SLL) populations
- Mapped areas of Natural Temperate Grassland of the Victorian Volcanic Plains
- Areas of Golden Sun Moth (GSM) habitat
- Native grasslands

It is also noted that comments from DEECA in 2023 also requested further avoidance in the Growth Areas.

The text box below provides an excerpt of some of these comments:

"Greater focus be placed on the conservation elements of the EPBC Plan in accordance with the offset mitigation hierarchy beginning with avoiding and minimising impacts to Matters of National Environmental Significance." - Corangamite Catchment Management Authority, 2023

"Please consider increasing the size of the areas for the Geelong Grasslands to prosper, put in more protective measures and consider a vegetation plan to strengthen these areas" – submitter 12, 2023

"Current plans are to protect 100 ha of the 700 ha of Golden Sun Moth habitat in a Strategic Conservation Area. The 100 ha is a good start but is insufficient. Increasing the total spatial extent of the Strategic Conservation Areas will greatly enhance the resilience of the Golden Sun Moth metapopulation" – submitter 9, 2023

"Four known Striped Legless Lizard populations occur within the proposed GSA. All four of these populations should be protected within new conservation reserves" – submitter 2, 2023

"More, bigger and better Strategic Conservation Areas to genuinely protect the Growling Grass Frogs of Cowies Creek, the rich environment of the Moorabool River and its floodplain, all Striped Legless Lizard populations, the Natural Temperate Grassland of the Victorian Volcanic Plain (all of which is currently proposed for complete removal), as well as a large and significant population of Golden Sun Moths" - North West Alliance, 2023

"*DEECA notes that the majority of the proposed Northern Conservation Area comprises areas which is zoned rural and outside areas zoned for urban growth (SAR figure 3-6). Although DEECA supports the conservation of biodiversity value within rurally zoned areas, given the zoning (and existing limitations on development) the likelihood of loss of habitat within this area through development is low. As such the only portion of the northern conservation area for which the stated reason that the land "has high biodiversity values and is avoided for biodiversity purposes"* - DEECA, 2023

"Given the small area/portion of the growth area avoided based on the presence of biodiversity values and the presence of other areas of high biodiversity value within the growth area, DEECA considers that there is more opportunity to avoid impacts. Further avoidance for the purpose of biodiversity conservation would reflect CoGG's commitment to meeting the public duty obligation under 4B of the FFG Act." - DEECA, 2023

"More, bigger and better Strategic Conservation Areas to genuinely protect the Growling Grass Frogs of Cowies Creek, the rich environment of the Moorabool River and its floodplain, all Striped Legless Lizard populations, the Natural Temperate Grassland of the Victorian Volcanic Plain (all of which is currently proposed for complete removal), as well as a large and significant population of Golden Sun Moths" - North West Alliance, 2023

"All 6 patches of Natural Temperate Grassland of the Victorian Volcanic Plain should be protected. The time for compromise over endangered ecosystems is long past" - Koala Clancy Foundation, 2023

"Current plans to protect only one of the four populations of striped legless lizards in the Northern Geelong Growth Area will make it almost impossible for this species to continue to survive" - submitter 1, 2023

"An area with high quality habitat has been selected as a protected zone, forming the NGGA Conservation Area, just north of the urban development zone. No other sections of land within that zone have been "avoided" in an effort to protect any MNEs present. Rather, these sites have been relegated to development with offsetting elsewhere to compensate for the destructive impact." - Geelong Field Naturalists Club, 2023

"The Strategic Assessment Report advocates strongly for the removal of all Natural Temperate Grassland of the Victorian Volcanic Plain in the Growth Areas, citing a number of unconvincing reasons. These suggest that the Geelong Strategic Assessment process was not sufficiently adequate or informed by appropriately updated and comprehensive research and data." - North West Alliance, 2023

"We make the following comments as a basis for improving the biodiversity outcomes of the GGAs... include as much as possible of the medium to high quality grassland within the NGGA into conservation reserves or future well-managed parkland." - Geelong Field Naturalists Club, 2023

"The NGGA Strategic Conservation Areas need to include the additional 18.6ha of Natural Temperate Grasslands currently proposed for clearance and direct loss." - Catchment Management Authority, 2023

"To protect endangered species such as Delma impar (Striped Legless Lizard), Synemon plana (Golden Sun Moth), and Litoria raniformis (Growling Grass Frog) and other species there needs to be ample suitable habitat for these animals to thrive. Only one section in the Northern Growth Area (to the south of Staceys Road) is a designated Strategic Conservation Area for Striped Legless Lizard and Golden Sun Moths and (two areas for Growling Grass Frogs in the Western Growth Area). 2,664.5 Ha of land is proposed for development and yet only 74 Ha of land is proposed for Striped Legless Lizard habitat and 108 Ha for Golden Sun Moth habitat protection. The amount of land set aside for Conservation Areas is not sufficient and pales in comparison to the size of land designated for development. Conservation Areas need to be significantly increased in size to create more buffering, connectivity and corridors so that animals can migrate in case of natural disasters (such as fire) and allow populations to grow." - National Trust, 2023

"It is impressive that there are 700 ha of Golden Sun Moth habitat in the Northern Geelong Growth Area. Then to read that 600 ha of this area (86%!) is to be cleared and is extraordinary. To not even consider inclusion of more habitat in "Opportunity" Areas (admittedly a poor alternative) and to justify losing that extraordinary amount because it's too degraded is a very poor, lazy effort." - Submitter 34, 2023

RESPONSE

To respond to comments from the 2023 public exhibition process, and the rediscovery of the VGED, the City undertook a second structured decision making (SDM) process in 2024 to help determine the optimal layout of the Growth Areas. The first SDM process was completed in 2022 to determine the initial layout of the Growth Areas as exhibited in 2023.

To identify the optimal avoidance layout for the NGGA following the 2023 exhibition, the SDM process considered three decision objectives and seven performance criteria. The decision objectives covered environmental, social, and economic issues and were:

1. Maximise the avoidance and protection of biodiversity
2. Maximise the supply of housing delivered in the precinct
3. Ensure the cost of the conservation program is feasible

Multiple alternative layouts and scales of avoidance across the NGGA were evaluated against these objectives. The layout that performed the best was incorporated into the Plan for re-exhibition in 2025. The detailed methods and findings of this process are provided in Supporting Document C to the SAR.

Following re-exhibition of the Strategic Assessment, the City underwent a process to finalise the Strategic Assessment documents in 2026. One of the key issues to resolve related to finalising the Northern Conservation Area to be protected under the EPBC Plan, in the context of:

- Public submissions from the 2025 re-exhibition period
- The City's investigations into deliverability of the strategic assessment
- Uncertainty regarding tangible conservation outcomes for Victorian Grassland Earless Dragon (VGED)

A detailed description of these considerations and the process undertaken to finalise the Northern Conservation Area is provided in Supporting Document E to the SAR. The outcome of this process was a revised layout of the Northern Conservation Area that now excludes 26.8 ha on 550 Elcho Road and 870 Geelong-Ballan Road (Avoidance Area C). To compensate for this loss of avoidance, the City is committing to delivering an additional compensatory measure for VGED that will directly contribute to recovery of the species. This measure is supported by members of the VGED Recovery Team and is as follows (see Commitment 17):

> *"The Victorian Grassland Earless Dragon Trust Fund will be established. A total amount of $12.7 million will be paid into the Trust Fund, to contribute to the recovery efforts of the species. Funding for the trust will include:*
>
> - *$1 million at establishment of the Trust Fund*
> - *$11.7 million paid via annual contributions, the final payment occurring before the end of Year 25 of the Plan"*

Details about the offset package for VGED is provided in Supporting Document D to the SAR.

4.2.2 SURVEY EFFORT / ACCESS

SUMMARY OF FEEDBACK

A number of stakeholders provided comments on the level of surveys within the Growth Area. The text box below provides an excerpt of some of these comments:

> *"We understand that several landholders have refused access to their land for ecological survey purposes. Landowners should not be rewarded for their lack of cooperation by having their land assumed to be free of Matters of National Environmental Significance. Development should not be permitted to proceed until surveys have been completed. Where MNES are subsequently found, development should proceed as a process-based development, but with the developer still required to pay the levy. There should be no benefit gained from withholding survey access"* - CoolGeelong, 2025
>
> *"Land holders have refused access to their land for purposes of ecological surveys should not be rewarded for their intransigence by having their land assumed to be free of MNES. Rather, development should not be allowed until surveys happen. If MNES are found, then development should proceed as though it is a process-based development, but with the developer still having to pay the Levy. That is, the developer should gain nothing by withholding survey"* – Geelong Field Naturalists Club, 2025
>
> *"The EHP report Existing Ecological Conditions: Northern and Western Geelong Growth Areas (July 2021) recommends that CoGG conducts further surveys to determine the presence of the NTGVVP ecological community. This recommendation must be acted upon. The large block that spans the Northern Geelong Growth Area boundary just south of the quarry has not been surveyed, though is highly likely to contain significant populations of Golden Sun Moth and Striped Legless Lizard"* – submitter 11, 2025
>
> *"The CCMA would like to know the minimum survey required to satisfy the EPBC Act requirements and whether these minimum levels have been achieved"* - Corangamite Catchment Management Authority, 2025

RESPONSE

Unfortunately, not all land was able to be accessed for targeted surveys. As noted in the SAR, around 33 per cent and 13.2 per cent of the NGGA and WGGA respectively were not subject to site surveys. The properties which were not accessed within the Growth Areas largely comprise many small, rural residential landholdings which are fragmented by windrows/landscaping and have a much higher proportion of land use for dwellings and driveways compared to the broader Growth Areas. The environment within these unsurveyed areas tends to be more modified or degraded as a result (see Section 13.3 of the SAR).

Section 13.3.2 of the SAR described the data used in the unsurveyed areas. This included a combination of:

- Over-the-fence observations by:
  - EHP during the time of their surveys (EHP, 2021)
  - The consulting team during site visits
- The results of the VGED survey program (Biosis, 2024)
- DELWP HIMs (DELWP, 2017)
- DELWP EVC modelling (DELWP, 2022)
- Historical species records (DELWP, 2025)

A detailed description of these sources is provided in Section 13.3.2 of the SAR. Overall, the data approach in the unsurveyed areas of the Growth Areas is considered to:

- Appropriately reflect the potential MNES that may occur based on the observations and expert opinions of a number of ecologists
- Be suitably conservative for the purposes of this assessment as:
  - The higher intensity land use associated with the smaller, rural residential landholdings across the unsurveyed areas compared with the surveyed areas means that the habitat attributes or condition needed to support the species or communities are less likely to be retained in these areas. Basing the extent of potential habitat in these areas on the equivalent extent in the surveyed areas is therefore more likely to over-predict, rather than under-predict, potential habitat. This is an appropriate way to address any residual uncertainty that arises from a lack of targeted surveys
  - The full extent of the HIMs were used in the assessment. As a result, even areas with lower levels of relative importance to the species were considered

The SAR provides detailed methods for predicting habitat for Striped Legless, Golden Sun Moth, and Natural Temperate Grassland in the unsurveyed areas. Please refer to the detailed impact assessments in Part 4 for the complete method used. In summary, these methods are considered to adequately address risks to these MNES as follows:

- Striped Legless Lizard and Golden Sun Moth - a detailed and nuanced method was applied to predict habitat in unsurveyed areas. This approach considered the potential value of the different areas of unsurveyed land (i.e. developed rural residential properties vs. undeveloped paddocks). For example, the two unsurveyed blocks of land along the western boundary of the NGGA were assumed to be of higher value given their location adjacent to mapped surveyed habitat and the apparent continuity of land use. More habitat on these properties was then predicted and reported on in the SAR, when compared to the rural-residential properties further south in the Growth Area. This relates to the block identified by Submitter 11 in the text box above
- Natural Temperate Grassland - A proportional approach was used to predict the area of NTG in the unsurveyed areas of the Growth Area. This approach compared the extent of modelled EVC 132 within the surveyed areas of the NGGA, with confirmed Natural Temperate Grassland patches based on surveys. This proportion was then applied to estimate the area of potential NTG in the unsurveyed areas. This approach is considered to be suitably conservative given that the ecological values within the unsurveyed areas are expected to be broadly consistent, if not reduced, when compared with the surveyed areas of the Growth Areas

For unsurveyed areas (outside the portion of Heales Road East subject to process based development, see below), the area of predicted habitat to be impacted under the EPBC Plan was factored into offset calculations (see Supporting Document D to the SAR).

It is also noted that part of the unsurveyed area of the NGGA (around 44 per cent) within the Heales Road East precinct will be subject to process based development. Prior to development of these areas, the Commitments and Measures under the EPBC Plan require targeted surveys within the development footprint for all protected matters with the potential to occur. Any confirmed population or occurrence of MNES that would be considered important or notable will be avoided, protected, maintained and managed (see Commitment 19). This process will further address uncertainty in the unsurveyed areas.

Further, NVPPs will be prepared as part of each PSP process, which will identify native vegetation to be retained and removed across each precinct, and state offset requirements. This process includes additional surveys in areas where EHP have not had access.

Overall, the approach to data in the unsurveyed areas is considered to appropriately address and mitigate risks in unsurveyed land.

4.2.3 COMPLIANCE FOR DESTRUCTION OF KNOWN MNES VALUES

SUMMARY OF FEEDBACK

Community and environment groups have expressed concern for the lack of compliance action regarding the loss of Striped Legless Lizard habitat in the south of the NGGA.

The text box below provides an excerpt of some of these comments:

> *"We urge the City of Greater Geelong to proceed with compliance action in relation to the allegation that a landholder cleared known Striped Legless Lizard habitat. It is deeply concerning that a landholder could destroy habitat of conservation significance and subsequently benefit from developing that land"* - CoolGeelong, 2025
>
> *"The potential loss of an entire population of Striped Legless Lizard and 19 ha of Striped Legless Lizard habitat must be investigated as a potential breech of the EPBC Act."*- North West Alliance, 2023

RESPONSE

Compliance with the EPBC Act is a matter for DCCEEW, as they are responsible for administering the Act.

The SAR identifies the destruction of habitat on this property, which has been reviewed by DCCEEW on a number of occasions.

It is noted that impacts to SLL habitat and records on this property have been considered prior to the loss of habitat. The loss of this habitat will therefore be offset through the strategic assessment.

In addition, the strategic assessment prioritised avoidance for SLL on habitat areas in the north of the NGGA, protecting the largest patch of confirmed habitat and a portion of the area mapped as suitable habitat within the Northern Conservation Area. This outcome, combined with offsets outside of the Growth Areas, is considered appropriate to compensate for impacts to this area of habitat.

4.2.4 LANDSCAPE CONNECTION / OPPORTUNITY AREAS IN THE BCS

SUMMARY OF FEEDBACK

Comments from both the 2023 and 2025 exhibition processes noted the role of landscape connections (previously termed opportunity areas), and expressed concern about the long term benefit these areas will have for biodiversity given that they will not be formally protected and managed.

One landholder in the WGGA also communicated concern over areas of land identified as landscape connections which are expected to be available for development based on more recent PSP planning.

The text box below provides an excerpt of some of these comments:

> *"Many of these "connections" are along what will be very busy roads and are therefore misleading. No documentation has been provided about the quality or provisions for ensuring biodiversity connectivity along and throughout any of these areas"* - North West Alliance, 2025
>
> *"We would like to see more effort made to allow connection corridors or biolinks between areas. Even if a direct connection is not possible, "Stepping Stones" should be provided"* - Friends of Bannockburn Bush, 2023
>
> *"My understanding is that the determination of biolinks will occur during the PSP process. This runs counter to the intentions of a strategic assessment: to do planning for biodiversity early to avoid inevitable land use conflict later. Biolinks must be put in place at the whole of landscape scale, that is one of the objectives of the Geelong Strategic Assessment"* – submitter 11, 2023
>
> *"Supporting the remnant grasslands requires that CONNECTIVITY be maintained to the fullest extent possible and it appears from the documents and maps supplied that all-important connectivity – within the Growth Areas, between the reservation areas and from reservation areas to remnant patches outside the Growth Area – has not been adequately catered for"* – submitter 11, 2025

"Bisinella Developments considers that the identification of parts of property 14 on the Bisinella Land as a 'Landscape Connection' in the BCS is too broad because it covers areas that have been acknowledged as being developable land in the draft PSP. It is not appropriate to identify this extent of land as a 'Landscape Connection' in the BSC, as Bisinella Developments does not agree that the land is only suitable for less intensive use or development." - Bisinella, 2025

"Clear tenure for Opportunity Areas: The future tenure of all conservation-related land needs to be clarified." - North West Alliance, 2023

RESPONSE

The landscape connections have been revised to incorporate up to date precinct planning.

The BCS described landscape connections as locations within the Growth Areas which may be suitable for less intensive use or development, such as open space or waterways, and where opportunities may exist for providing co-benefits for biodiversity through the infrastructure siting and design phase. Their primary purpose is not conservation. However, they may provide a contribution to biodiversity protection and enhancement where that is complementary to the primary purpose of the area. Landscape connections will be implemented by (see Section 2.2.4 of the BCS):

- Integrating biodiversity and biodiversity connectivity into urban landscapes and infrastructure design through the preparation of the PSP and detailed landscape design
- Restoring biodiversity to local parks, roadsides, open space reserves, waterways, escarpments, linear trails and streetscapes using Ecological Vegetation Classes (EVCs), natural regeneration techniques and indigenous plants of local provenance
- Restoring habitat into urban landscapes through the establishment of indigenous tree, shrub and understory plantings and other habitat elements such as wetlands, logs, rocks and stags
- Restoring degraded waterways and wetlands to create habitat and ecologically healthy water flows
- Minimise breaks and barriers in landscape connections through the detailed design at precinct planning

The strategic assessment has provided a landscape scale approach to avoiding and protecting MNES. This process identified the strategic conservation areas to be protected and managed under the EPBC Plan. This is a key focus of the strategic assessment.

The landscape connections provide an opportunity for benefiting biodiversity, however (as above) they are not primarily intended for conservation. Further detailed planning for the precincts is required to best locate these areas in the context of the urban form.

4.2.5 EXTERNAL INFRASTRUCTURE

There were a number of specific comments on the external infrastructure process. These comments, and responses, are provided in the table below.

Table 3: Specific comments on the external infrastructure process

Comment	Response
"Water, sewer and recycled water assets required for servicing of the growth areas is not captured in the identified "external infrastructure footprints". This includes the construction of the North West Recycled Water Centre and Advanced Water Recycling Facility at 795-865 Anakie Road, Moorabool, and the associated recycled water pipeline to Black Rock" - Barwon Water, 2023 *"Barwon Water's understanding of the servicing requirements for the growth areas and associated infrastructure footprints has evolved as more detailed plans have been developed. We would welcome further engagement with Council officers to discuss these requirements"* - Barwon Water, 2025	The external infrastructure footprints have been revised to incorporate Barwon Water's infrastructure requirements. It is noted that the footprint shown in the Plan is indicative, and process based development for external infrastructure includes any area within the Strategic Assessment Area outside of the Growth Areas.
"Barwon Water is committed to delivering on the objectives of the Northern and Western Geelong Growth Areas Integrated Water Management (IWM) Plan developed in partnership with CoGG in 2021. We note that many of the opportunities identified within the IWM plan could help reduce the potential impacts on conservation areas and significant downstream waterways, wetlands and environments through helping to limit or manage changes in water flows and quality" - Barwon Water, 2023	Integrated Water Management will be considered through detailed PSP planning for the Growth Areas. It is also noted that the EPBC Plan has included a measure (57) which directly relates to IWM through undertaking technical water studies for Hovells Creek and the Moorabool River. These studies will identify appropriate standards or targets, including water quality parameters, water retention and flow management requirements, limits on extraction or use, habitat buffer requirements, monitoring and reporting. The Hovells Creek technical water study is currently in process, and has a direct relationship to IWM.
"Barwon Water is seeking clarity on the next steps and processes related to the required environmental approvals for our infrastructure and the intentions of the Strategic Assessment Report approach. We would welcome further engagement with Council officers to understand how we can best align our plans and environmental approvals processes to ensure a streamlined approach to delivery of servicing infrastructure" - Barwon Water, 2025	Noted. The City has, and will continue to engage with Barwon Water.

Comment	Response
"It is understood that if MNES are identified through these future assessments, an avoid–mitigate–offset approach will be required, which has the potential to significantly delay the delivery of critical assets. The process-based development commitments outlined in Section 6.4 of the EPBC Plan require that Spiny Rice-flower and Victorian Grassland Earless Dragon habitat must be avoided, however no assessment has been undertaken to determine the likelihood of these species occurring in conflict with proposed infrastructure provision. Deferring this work until after Creamery Road PSP approval creates significant uncertainty and may impede the timely delivery of infrastructure and the coordinated sequencing intended under the Creamery Road PSP" - SIG Group, 2025	It is noted that areas for external infrastructure have not been surveyed as part of the strategic assessment, and therefore the biodiversity values and avoidance, mitigation and offset requirements are unknown. Because of this, it is not appropriate to include these areas as 'development land' under the Plan The inclusion of external infrastructure as process based development under the Plan provides a more streamlined approach to EPBC approvals for these areas, and prevents the need for further approval under the EPBC Act. Ecological surveys and avoidance, mitigating and offsetting (where necessary) in these areas would still be required if not included under process based approval.
"Commitment 81 of the Referral also states that offset sites for MNES impacts relating to external infrastructure are to be coordinated by the project proponent, which is inconsistent with the approach for all other offsets which are secured by Council. Further guidance is needed as to whether there is any scope for external infrastructure offsets to be incorporated into Council's offset obligations, particularly given that this infrastructure enables broader precinct development" - SIG Group, 2025	The EPBC Plan provides a clear pathway for external infrastructure which streamlines the EPBC approvals process. This approach minimises statutory timeframes. It is noted that areas for external infrastructure have not been surveyed as part of the strategic assessment, and therefore the biodiversity values and avoidance, mitigation and offset requirements are unknown. Additional offset requirements for external infrastructure will be determined as part of process based development, and cannot be quantified for inclusion in the current offset requirements under the EPBC Plan.
"The Plan's commitments for external infrastructure development in Table 6.1 single-out Spiny Rice-flower for preferential treatment. Any population of SRF must be avoided, while the protection or avoidance of any other Matters of National Environmental Significance is up to the Executive Committee. *This is absolutely wrong. No Matters of National Environmental Significance should be prioritised over other Matters of National Environmental Significance without very clear context-specific arguments being considered. What this suggests is that there is some back story regarding the location of infrastructure and its impacts on Spiny Rice-flower that is being concealed from scrutiny* *The role of the Executive Committee here is also very surprising. They should not have the authority to determine if Matters of National Environmental Significance should be avoided, to determine if a population is important or notable. To implement such an approvals system is to open the door to abuse and for DCCEEW to walk away from its oversight of Matters of National Environmental Significance."* - North West Alliance, 2023	The Plan's commitment regarding external infrastructure refers specifically to Spiny Rice-flower, and Victorian Grassland Earless Dragon due to their Critically Endangered conservation status and the significance of any occurrence of these species. For other MNES, the Commitment includes the following statement: "*any confirmed population or occurrence that would be considered important or notable (for instance, due to size, condition or potential contribution to the recovery of the MNES) must be avoided and will be protected, maintained and managed to ensure the persistence of that population or occurrence in the long-term. Impacts to all other populations or occurrences will be avoided and minimised as far as practical*". This approach is considered to be suitably conservative and proportionate to the listing status of the relevant MNES. The Plan includes a set of requirements and standards for process based development which will be developed further in consultation with DCCEEW and DEECA. The proposed approach is considered appropriate and has been reviewed by DCCEEW (see Section 6.3 of the Plan).

4.2.6 OTHER COMMENTS ON PLAN DESIGN

There were a number of other comments on the design of the EPBC Plan. These comments, and responses, are provided in Table 4 below.

Table 4: Specific comments on EPBC Plan Design

Comment	Response
"The potential for the proposed strategy to fail before it even begins, at least as it relates to the Site and the Northern Conservation Area, is also demonstrated by the very loose KPI 4 adopted. To state that "hectares of" land will be protected upon acquisition is simply saying that the bureaucrats will see the program a success once it purchases the relevant land and prepares a Conservation Management Plan for it" - Landowner of 135 Staceys Road, 2025	There are a number of Key Performance Indicators that relate to the success of the Northern Conservation Area (Key Performance Indicators e–j). These include both: • Hectare requirements, to ensure that the overall hectares identified in Commitment 4 are achieved (Key Performance Indicators e–h) • Key Performance Indicators related to Commitment 5: "A Conservation Management Plan will be prepared by a suitably qualified environmental professional and implemented for the protection and ongoing management of Striped Legless Lizard, Golden Sun Moth and Victorian Grassland Earless Dragon within the Northern Conservation Area." These Key Performance Indicators (i and j) relate to both the preparation of the CMP and the achievement of the objectives of the CMP It is noted that the CMP will include management, monitoring and reporting requirements and will need to be prepared to the satisfaction of DCCEEW. Success of the strategic approval will be contingent on KPIs of the CMP being met. This will be demonstrated through annual compliance reporting to be transparently published on the City's website in accordance with EPBC Act public disclosure conditions. Overall, these Key Performance Indicators are considered appropriate to measure the success of protection of the Northern Conservation Area (in hectares), and the protection and ongoing management of the Conservation Area for MNES.
"The quantity of additional strategic work required as part of the Referral is a key concern, given its potential to extend timeframes and add significant process burden. There is a clear risk that delays in finalising additional strategic work such as the Funding Program and Stakeholder Engagement Strategy could affect the commencement of development within the precinct. *An example of this, is the Funding Program which requires the further establishment of an implementation fund and governance and administrative arrangements, in addition to the incorporation of the program into the future Urban Growth Zone (UGZ) affecting Creamery Road PSP. There is considered to be a sizeable amount of work still to be completed and adds additional uncertainty around what must be included in the UGZ. Depending on the form and content of the information required this could delay ultimate gazettal of the Creamery Road PSP itself.*	The commitments and measures document provides the responsibility and timing for these pieces of work. This includes: • The stakeholder engagement strategy, which is the responsibility of the City. For timing, a draft is to be provided to DCCEEW within the first 3 months of Plan implementation • Funding arrangement, which is the responsibility of the City and will occur prior to development proceeding in the Growth Areas. It is noted that the City has set up an implementation team, and is actively preparing these processes ahead of EPBC approvals

Comment	Response
In respect to the preparation of a Stakeholder Engagement Strategy, the Referral does not make any recommendations or directions in respect to how this Strategy should be set out or the timeframes to complete this work. We stress the importance of establishing a clear consultation framework. This is particularly important to outline how stakeholder engagement is to be undertaken as part of any changes which occur under the adaptive management components of the Referral, which enable the directions of the Part 10 Approval to be amended by Council in the event of environmental change. *Compounding this risk, the Referral provides no timeframes or deadlines for the completion of this work, nor any assurance that it has commenced, creating further uncertainty for precinct delivery."* - SIG Group, 2025	
"The Plan and SAR must be updated to confirm in no uncertain terms that the NGGA Conservation Area land will be acquired. At best, there is misalignment between the documents and the updates are needed for consistency; at worst, the vague references in the Plan and SAR – which are the only binding Part 10 documents – mask a disingenuous commitment to acquisition that will change upon approval of the Part 10 documents. If there is in fact a commitment to acquire, then updating the Plan and SAR to make this clear can easily be done." - Landowner of 135 Staceys Road, 2025	There are 2 measures associated with Commitment 4, which clearly state that the Northern Conservation Area will be purchased. These include: • Measure 15: *Purchase Stage 1 of the Northern Conservation Area (as shown in Figure 1 of SAR Supporting Document D)* • Measure 16: *Purchase Stage 2 of the Northern Conservation Area (as shown in Figure 1 of SAR Supporting Document D)*
"Outcome 5 – states that The Plan improves regulatory efficiency by streamlining EPBC Act approvals. *The Plan should be clear that the outcome of the strategic assessment should be to improve regulatory efficiency for all parties (the City, the Commonwealth, the State and third parties).* *We recommend that the outcome is updated to read: "The Plan improves regulatory efficiency by streamlining Victorian and Commonwealth environmental approvals for third parties, the City and the Commonwealth Government."* *However, if the Strategic Assessment is to be purely EPBC Act focused, then some key changes are required to implement the outcome, in particular regarding:* • *Remove reference to State matters, State offsets can then be satisfied under current arrangements. That is, a developer can, in some circumstances use an offset site to satisfy both State and Commonwealth offsets.* • *Other State policies and requirements (other than listing them and explaining they will be separately satisfied).* *At the moment it is unclear as there are references to State matters throughout the documentation, almost all of which can be removed unless directly relevant to the Commonwealth commitments in the EPBC Plan.*	The Strategic Assessment includes both EPBC and State level outcomes. The EPBC Plan relates to strategic assessment under Part 10 of the EPBC Act, and the BCS includes additional state level outcomes/requirements. The EPBC Plan is clear on how it relates to State matters. For example, Section 1.6 includes the following text: "The Plan does not address Victorian planning, biodiversity or other regulatory requirements. Separate approvals are needed in accordance with State regulatory requirements before the development under the Plan can proceed" The BCS is also clear on how it relates to State matters. For example, Section 1.1 clearly describes its purpose. To clarify this and to avoid confusion, the wording around the definition of an outcome has been adjusted to remove reference to "broader State-wide, regional and local planning policies." in the EPBC Plan (and where relevant in the Commitments and Measures document and SAR). Therefore, the outcome raised in this comment does not require any changes as suggested as it sits within the EPBC Plan.

Comment	Response
If the BCS is designed to address some State matters, then its remit should be clearly explained in the introduction of the document." - Lovely Banks, 2023	
"The Plan and the commitments and measures document note the importance of ensuring that implementation of the strategic assessment is effective, timely and cost efficient. However, none of these terms are defined or given a reference point in the Plan. The discussion for Outcome 6 should specifically identify: • *What the effectiveness of the Plan is being compared to and what the indicators of effectiveness are.* • *What constitutes timely implementation.* • *How do you determine that implementation activities are cost effective and the baseline.* *These definitions and reference points should be included in the Plan.* *If the EPBC Plan does not propose any integration with State matters then all references to State matters should be removed from the Plan, other than acknowledgement of the State legislation and regulations that need to be separately satisfied and support implementation requirements."* - Lovely Banks, 2023	No change has been made in relation to this comment. Section 2.2.1 of the Commitments and Measures document already provides an explanation/discussion for each outcome. It is worth noting that KPIs have now been drafted and were included in the 2025 Commitments and Measures document for public exhibition. The references to State matters in the Plan are appropriate (as discussed above). In addition, the evaluation section of the MERI framework within the Plan provides context and further information about effectiveness. This information was presented in the 2023 draft of the Plan.
"The post-approval requirement to undertake technical studies related to water has the potential to result in significant delays to the development of affected PSPs and has the potential to affect the NDA of some developments if additional buffer area is required. *This creates uncertainty for proponents. As a result, development activities cannot be pre-emptively planned to meet a particular requirement or outcome. This results in a less streamlined process as well as financial and delay risks. This process also undermines the strategic assessment process as the Commonwealth Environment Minister cannot have an understanding of the impacts of implementing the Plan (required for an approval decision) without this information. This risks having a greater gap between the endorsement of the Plan and the granting of a Part 10 approval.* *The requirement is also not required based on the work undertaken by Biosis and Water Technology for the Northern Growth Area. For example, refer to the discussion in the Draft Strategic Assessment Report, section 22, and in particular Section 22.6. This text is clear that there will be no impact on RAMSAR matters.* *However, the SIA still includes a requirement for each PSP to undertake technical studies which we understand would come to the same conclusion. The conclusion below also makes that clear that it's unlikely the risks will be significantly exacerbated by the development under the Plan.*	No change has been made in relation to this comment. As discussed in the SAR (Section 22.6) and noted in the comment, there will be no direct impacts to the Ramsar sites and indirect impacts are unlikely if mitigated appropriately. As Section 22.7 of the SAR discusses, the development will not result in significant indirect impacts due to appropriate mitigation. However, this can only be assured through the commitment to undertake the technical studies. The technical studies will ensure that potential indirect impacts from changes to water flows and quality are adequately understood and therefore mitigated appropriately. These studies are necessary to: "*Identify appropriate measures, standards or targets to avoid and minimise adverse impacts on protected matters including, as relevant:* • *Water quality parameters* • *Water retention and flow management requirements* • *Limits on extraction or use* • *Habitat buffer requirements* • *Monitoring and reporting"* As a result of the impact assessment undertaken in the SAR and the commitment to undertake these technical studies to ensure appropriate mitigation, the Minister will have a sufficient understanding of impacts (i.e. the Ramsar site will not be adversely

Comment	Response
Biosis have comprehensively addressed the RAMSAR issues and no significant issues as a result of development in the Growth Areas have been identified." - Lovely Banks, 2023	impacted) to enable endorsement and approval. The technical studies are therefore not required to be completed prior to endorsement and approval. Timing for the Part 10 process would extend significantly if these studies were to be undertaken prior to approval. It is noted that the Hovells Creek technical water study is currently underway and will be completed in the near future. The Moorabool technical water study will be commenced alongside precinct planning for Batesford North.
"The inclusion of requirements for the Commonwealth Environment Minister or DCCEEW to approve implementation documents or any updates to those documents has the potential to result in delays to the development of the implementation documentation. *This is counter to the intended outcome of the Plan (Outcome 5) to streamline the approvals processes under and provide for efficient, timely and cost-effective implementation (Outcome 6). It also does not align with contemporary strategic assessment practice which aims to reduce the role of the Commonwealth regulator in the post-approvals phase (i.e., outcomes assurance).* *It is also unnecessary. Lovely Banks submits that the EPBC Plan can be drafted to ensure that no further Commonwealth approvals of implementation documentation are required.* *The Plan should be updated to clearly identify the roles of all parties based on the content outlined in commitments and measures."* - Lovely Banks, 2023	The City, in consultation with DCCEEW, further considered the role of DCCEEW in implementation. As a result of this process, the documents have been updated as follows: • DCCEEW and other regulators are no longer part of the Executive Committee and instead function as observers of the committee with executive oversight • DCCEEW's responsibilities have been updated to remove approval of implementation documents and any changes to these documents • Measure 86 no longer requires approval role for DCCEEW in relation to the Executive Committee
"The Plan utilises a footprint-based approach for the implementation of the strategic assessment. As the Plan is set at the time of endorsement, there is no ability to shift the boundary of the Growth Areas or the proposed Conservation Areas should this be required in the future. *Any further urban development outside the Plan area can be assessed under the Parts 7 to 9 of the EPBC Act. This is the same as the Melbourne MSA where the Logical Inclusions or any other development outside the relevant PSPs are not subject to the approval.* *There is no process under the EPBC Act which would allow for the Commonwealth Environment Minister to 'endorse' the change to a boundary in the Plan. All references to this process should be removed.* *The Plan does not provide guidance on how developments which occur cross-boundary should be considered (i.e., when they are covered by the strategic assessment and when they are not), despite 'split actions' being clearly considered in the funding program. Guidance on how split actions are proposed to be managed in the post approvals stage should be clearly outlined in the draft Plan."* - Lovely Banks, 2023	DCCEEW does allow for minor changes under the Part 10. This is known from past and current experiences with DCCEEW on other strategic assessments (such as the CPCP, which is currently undergoing adjustments to the boundaries in consultation with DCCEEW). To ensure clarity and that changes are only undertaken if minor, the Plan has further defined and constrained what is meant by 'minor' boundary change in Section 4.5. This includes a requirement to survey the proposed change area and where no MNES are recorded within the boundary change area, this is considered minor and included as part of the endorsed process. Where MNES are recorded it will not be included and will require approval under Parts 7-9 of the EPBC Act for the change to be made. This section has also been amended to include requirements around the new/additional avoidance areas.

Comment	Response
"Based on the draft documentation, it appears that components of the implementation process have not yet been fully designed including Key Performance Indicators (KPIs), the mechanisms that will give effect to the registration process and the regulations to allow for the levy process. *The EPBC Plan should be amended now to include these elements. Some of these processes are relevant to the Commonwealth Environment Minister having confidence to endorse the Plan and issue a class of actions approval."* - Lovely Banks, 2023	It is noted that KPIs have now been drafted and were included in the 2025 Commitments and Measures document for public exhibition. No change is needed to the Plan. The funding program will be finalised as part of the package that is presented to the Commonwealth and this will address registration and levy issues.
"A clear dispute resolution process should be included in the draft Plan. A dispute resolution process should be clearly outlined in the draft Plan to ensure that future issues are dealt with fairly and in the manner intended in the Plan. *This may be relevant in relation to a number of governance matters including how new information is incorporated through the adaptive management processes and the process through which developer implementation plans are considered by the City."* - Lovely Banks, 2023	The City agrees with this comment, and a dispute resolution process has been drafted and added to the Plan (Section 7.3.6) with reference also made to the process in 7.3 and the SAR (Part 5).
"The Plan defines classes of actions based on a list of eligible activities outlined in the Plan. The Plan proposes an approach whereby other development types to those listed in the Plan can be included within the class if they have similar impacts. *This proposed approach will present challenges in the administration of the approval as it creates discretion as to what activities are covered and what are not covered by the Part 10 approval. This creates uncertainty as to whether a particular action is covered by the class and will require the City to make determinations during implementation on whether or not a particular activity is covered by the Class."* - Lovely Banks, 2023	No change has been made in relation to this comment. The approach to the Classes of Actions is considered appropriate. The definitions are linked to the Victorian Planning Provisions and the approach provides the right level of certainty and flexibility for a long term project. Any attempt to be more prescriptive is likely to create greater problems by removing the capacity for discretion in the implementation of the Plan. The classes of actions were designed in consultation with DCCEEW and the City.
"Commitment 1 states that Development within the Strategic Assessment Area will proceed in accordance with any Commonwealth approval conditions and generally in accordance with the EPBC Plan and NWGGA Biodiversity Conservation Strategy. *Actions taken under a Part 10 approval must be in accordance with an endorsed Plan. The use of the word 'generally' in the wording of the commitment above is problematic to the operation of the Plan as it implies a level of discretion in how actions can be taken that is not supported by the EPBC Act.* *The word generally should be removed from Commitment 1 and all discussion of how the Plan operates."* - Lovely Banks, 2023	The word 'generally' has been removed from Commitment 1 and in reference to Commitment 1 throughout all the documents.
"The Plan should be future proofed and refer to legislation and entities with regards to their function to allow for them to change over the life of the Plan (e.g., the Minister with responsibility for administration of the EPBC Act)." - Lovely Banks, 2023	An upfront statement has now been included in Section 1.6 of the Plan to ensure the Plan is future proofed against any changes to legislation etc.

Comment	Response
"The Plan states that 'The planning system has a key role in ensuring regulated third-parties (developers) undertake development under the Plan in accordance with the Commonwealth approval conditions and requirements of the Plan.' *This is not an accurate reflection of the role of the State or City in the administration of the Part 10 approval. Neither the state nor the City can enforce compliance with administered conditions of a Part 10 approval as they do not have the power to administer the EPBC Act. This requirement always remains with the Commonwealth Environment Minister. The Plan should be clear that compliance with the Plan, as regulated through the Victorian Planning System, is the responsibility of the City / Victorian Government, while compliance with the EPBC Act conditions of approval remain the responsibility of the Commonwealth."* - Lovely Banks, 2023	The Plan is clear that responsibility for EPBC Act compliance sits with the Commonwealth (e.g. Table 7-10 in Section 7.6.4). The Victorian planning system will play a key role in implementation, and will therefore play a key role in ensuring the approval conditions and requirements of the Plan are met. The statement "The planning system has a key role in ensuring regulated third-parties (developers) undertake development under the Plan in accordance with the Commonwealth approval conditions and requirements of the Plan" has been deleted to avoid confusion, as the role of the planning system in implementation is clearly explained in the Plan (see Section 2.3).
"Lovely Banks submits that the commitments related to managing impacts to MNES in the Plan should be updated to utilise language which clearly enables measuring and auditing as part of the five yearly reporting requirement. In addition, all commitments should be SMART and outlined in the Plan to support the assurance process. *To enable effective auditing of the outcomes in the Plan, the interpretation of the outcomes (currently outlined in the commitments and measures document) should be included in the Plan."* - Lovely Banks, 2023	No change has been made in relation to this comment. The Commitments and Measures when read together meet the SMART principle. They are specific about what will be done, who is responsible, and when they need to be achieved. In addition, there are KPI's for each of the Commitments which ensure they are measurable and auditable.
"The draft strategic assessment is structured so that EPBC Act offsets are covered through the Plan and the biodiversity levy, however, it remains the responsibility of the developer to source offsets under the state framework. *This is a very inefficient approach and misses an opportunity to consolidate state and commonwealth offsets to achieve better environmental outcomes. It also means that developers are unable to use the same offsets for state and Commonwealth processes where ordinarily this would be a possibility.* *The removal of the ability to have coordinated offsets results in financial risks for developers and delay risks associated with two independent offset processes. It also significantly undermines the rationale behind a strategic approach that streamlines the environment assessment and approvals process.* *Lovely Banks requests that reference to State offsets should be removed from the documentation (as it is not a combined State process) to give developers the flexibility to jointly deliver offsets to satisfy both regimes."* - Lovely Banks, 2023	The BCS has been updated to clarify co-location of offsets.
The draft strategic assessment identifies biodiversity investigations areas in the BCS and a requirement for additional technical studies associated with water in the Plan.	No change has been made in relation to this comment.

Comment	Response
A requirement to consider these two components in PSP design has the potential to reduce the NDA for individual developments depending on outcomes. However, the offset liability which needs to be delivered for the strategic assessment (as a whole) remains fixed in the Commitments (refer Commitment 10). In effect this means that if there are any reductions in NDA through the PSP process, higher biodiversity levies will need to be applied to each development to fund the conservation work commitments in the Plan. This cost will most likely be passed on to purchasers affecting the cost of land within the NWGGA. If the levy amount was not increased, the result would be less money available to deliver the commitments under the Plan which runs the risk of offsets not being delivered in time, and development being paused. *As a result, there is no financial incentive in the Plan to reduce impacts through the retention of biodiversity investigation areas or along waterways where those areas contain MNES.* *This can be addressed as set out earlier in the submission through a reconciliation process for offsets which should be explained in the EPBC Plan."* - Lovely Banks, 2023	The investigation areas in the BCS only occur in the southern precincts of the WGGA and sit outside the EPBC Plan area/Strategic Assessment area. It is not intended for there to be a financial incentive for further avoidance within proposed development areas. Rather, any avoidance at this scale would occur as part of the normal PSP processes including consideration of open space, drainage areas etc. None of the technical studies relevant to the Plan will lead to further avoidance and retention of MNES that are subject to offsets. For example, if more land is needed to enable adequate drainage/water retention on site, this land will not lead to further avoidance and protection of any MNES that are subject to offsets and therefore warrant a reduction in the offset liability. That drainage land, while not contributing to the NDA, is still being used for development.
"The proposed Work in Kind system is likely to lead to poorer conservation outcomes than if third parties or the City of Greater Geelong managed the offsets. Experience has shown that developers will only ever undertake the bare minimum of management necessary to fulfil their obligations. Work in Kind agreements will require heightened oversite and close scrutiny to ensure that developers act as good corporate citizens, and it will place an unfair burden on the City of Greater Geelong. Work in Kind proposals should not be allowed." - North West Alliance, 2023	The Works in Kind offsets may only be delivered where they meet the same standards for offsetting that are required for all offsets under the Plan. The approach is considered appropriate where it can facilitate successful offset delivery.
"While parts of the Northern Growth Area were identified as potential VGED habitat, the surveys undertaken did not detect any species. Despite this, several areas are mapped in the Strategic Assessment as "potential suitable habitat" (Refer Figure 3). *Growland requests that the Council confirm that the areas of Growland's landholdings subject to this identification will not in any way constrain its future redevelopment."*- Growland, 2023	The final layout for the strategic conservation areas in the NGGA to be submitted for approval does not include Growland's landholdings. These properties will be subject to development approval under the Part 10 strategic assessment. It is noted that detailed planning will occur during the PSP process.
"The Strategic Assessment and supporting documents also include insufficient information about the methodologies for determining when offsets will be required and how they are to be calculated, the timing and content of conservation management plans, and no assessment of the Victorian Grassland earless dragon and the Blue-winged parrot." - Villawood, 2023	The following dot points respond to the various issues raised in this comment: • Offsets: the 2025 re-exhibited documents, and the final version submitted for approval provide the clear methodology for offsetting in Supporting Document D to the SAR • CMPs: The commitments and measures document provides clear timing for preparation of CMPs and the information required in the CMPs • Additional MNES: an assessment of Blue-winged Parrot was provided both the 2023 documentation for exhibition, and the 2025 re-exhibited documents. The 2025

Comment	Response
	re-exhibited documents provide a detailed assessment of Victorian Grassland Earless Dragon
"Given that offset costs have recently escalated substantially, it is unreasonable to disregard already secured offsets. We therefore request that the final EPBC Plan recognises and accepts Growland's existing offsets and provides a clear pathway for developers to apply their own offsets rather than requiring further contribution to a consolidated Council managed levy fund." - Growland, 2025	The EPBC Plan and associated funding program provide for Works in Kind and Land in Kind as alternative contributions to the biodiversity levy. The detailed process and arrangements for these contributions will be established under Commitment 24 of the EPBC Plan. Accordingly, the City is not in a position to commit to specific offset arrangements until this process has been finalised.
"Given the ecological significance of these wetlands for the Growling Grass Frog, it is essential that Bisinella Developments is able to deliver the required habitat wetlands on its land as WIK, enabling these works to be recognised as a direct contribution towards its Levy liability. *This position is reinforced by the TactEcol Review, which highlights a critical gap in the current assessment framework: while the Strategic Assessment Report and EPBC Plan repeatedly reference 'habitat enhancement works' and management of the CCCA, there is no concrete commitment within the documentation to deliver new offstream wetland habitat within the CCCA, despite its essential role in supporting Growling Grass Frog breeding and long-term viability."*- Bisinella, 2025	The EPBC Plan and associated funding program provide for Works in Kind and Land in Kind as alternative contributions to the biodiversity levy. The detailed process and arrangements for these contributions will be established under Commitment 24 of the EPBC Plan. Off-stream habitat will be identified and delivered through the Cowies Creek CMP. This is captured in Measure 43 of the EPBC Plan.
"The Strategic Assessment establishes additional processes for approving external infrastructure and development in specific areas of the Heales Road East Precinct which are intended to address uncertainties and streamline approvals. *While this framework is generally supported, DEECA would like to be reinstated as an observer with executive oversight for the EPBC PELG. This group is responsible for approving process-based development and will consist solely of CoGG staff. Including DEECA within the group is appropriate given our current statutory advisory function on standard EPBC referrals."* - DEECA, 2025	DEECA's role in the Governance framework has been revised. DEECA is now identified as a key party in the governance framework and is included within the Strategic Assessment Executive Leadership Group with an 'executive oversight' role. Review of process based development, and ensuring offset requirements have been met as per the Standards for Process Based Development is identified as a key role for DEECA as part of the Executive Leadership Group. Reference to DEECA's role is also included in the Process Based Development chapter.
The North West Alliance provided a set of detailed comments against the Commitments and Measures document in the 2023 public exhibition process.	These comments have been considered and incorporated into updates to the EPBC Plan.

4.3 NORTHERN GEELONG GROWTH AREA

4.3.1 NORTHERN CONSERVATION AREA

There were a number of issues relating to the Northern Conservation Area. This includes:

- Properties included in the conservation area
- Avoidance area C
- Value of the Northern Conservation Area for Victorian Grassland Earless Dragon

PROPERTIES INCLUDED IN THE CONSERVATION AREA

Summary of feedback

A number of stakeholders commented on the properties which have been identified to be included in the Northern Conservation Area. This involved a number of conflicting submissions, which generally relate to the:

- Inclusion of additional properties to be included in the conservation area which are not currently identified for conservation. More specifically, further avoidance has been requested on properties where MNES values have been mapped by EHP
- Exclusion of properties from the conservation area which had been identified for conservation. In particular, a number of landholders were of the opinion that the biodiversity values on their properties were not of sufficient value to warrant avoidance, or questioned the decision making process used to identify the conservation area

The text box below provides an excerpt of some of these comments:

"DEECA considers the current extent of conservation areas to represent the minimum acceptable limit and does not support any further reduction. Should further avoidance opportunities be required following as assessment from DCCEEW, DEECA identifies the following areas:

- *Area B – This area is defined in Supporting Document C (the Structured Decision Making Report)*
- *400 Elcho Road – DEECA notes that the ecological conditions report (EHP 2021) identifies the site as containing high quality grassland and significant ecological values.* [submitter] *suggests that the Northern Conservation Area could be extended to include this site."*

- DEECA, 2025

"The strategic assessment does not support inclusion of the Site within the NGGA Conservation Area, primarily for the following reasons: … a) The biodiversity values on the Site do not warrant its inclusion" - Landowner of 135 Staceys Road

"Area C should be excluded from the Northern Conservation Area." - Lovely Banks, 2025

Response

As described above in Section 4.2.1, a process was undertaken to finalise the Northern Conservation Area. This is described in Supporting Document E to the SAR.

The final Northern Conservation Area appropriately balances conservation and development in the NGGA, and provides a suitable outcome for the Strategic Assessment.

AVOIDANCE AREA C

Summary of feedback

One of the major landholders in the NGGA, Lovely Banks, provided detailed submissions on both the 2023 and 2025 Strategic Assessment document packages. One of the key recommendations from the 2025 submission was:

> *"Recommendation 2: Area C should be excluded from the Northern Conservation Area."*

The Lovely Banks submission provided a range of arguments in support of their recommendation to exclude avoidance area C from the Northern Conservation Area. In summary, these related to the:

- Economic implications of removing the land subject to development under the Strategic Assessment. This related to:
  - Costs for restoring the site
  - Loss of net developable area (and associated implications for jobs, dwellings etc)
- Uncertainty regarding the ecological values of the site, and the conservation outcomes for VGED associated with protecting avoidance area C

Lovely Banks provided an alternative proposal in their submission to compensate for impacts within the NGGA. Broadly, this included:

- Removal of avoidance area C from the Northern Conservation Area
- A $10 million dollar contribution to the recovery of VGED through a conservation framework prepared by Odonata Foundation. This proposal focused on protecting and managing the rediscovery site, and an additional 2 sites for the potential reintroduction of VGED

Response

The City undertook a detailed process to respond to these comments in finalising the Strategic Assessment (see Supporting Document E to the SAR). The outcome of this process was a revised layout of the Northern Conservation Area to exclude 26.8 ha on 550 Elcho Road and 870 Geelong-Ballan Road (Avoidance Area C). To compensate for this loss of avoidance, the City is committing to delivering an additional compensatory measure for VGED as follows (see Commitment 17):

> *"The Victorian Grassland Earless Dragon Trust Fund will be established. A total amount of $12.7 million will be paid into the Trust Fund, to contribute to the recovery efforts of the species. Funding for the trust will include:*
>
> - *$1 million at establishment of the Trust Fund*
> - *$11.7 million paid via annual contributions, the final payment occurring before the end of Year 25 of the Plan"*

Details about the offset package for VGED is provided in Supporting Document D to the SAR.

VALUE OF THE NORTHERN CONSERVATION AREA FOR VICTORIAN GRASSLAND EARLESS DRAGON

Summary of feedback

There was concern from some landholders regarding the value of the Northern Conservation Area (including Avoidance Area C) for the VGED.

The text box below provides an excerpt of some of these comments:

> *"Simply managing or 'improving' an area of habitat for the Victorian Grassland Earless Dragon will not provide a conservation gain for the species if it cannot be repopulated naturally or by reintroduction"* - Lovely Banks, 2025
>
> *We understand that while the Northern Conservation Area has been identified as potentially important for the Victorian Grassland Earless Dragon, no reintroduction plans are actually proposed or included as a commitment under the Plan. In the absence of any plans to reintroduce the species, the enlargement of the Northern Conservation Area to meet the '100ha threshold' outlined in the Conservation Advice reads as a box-ticking exercise that does not actually deliver any tangible outcome for the species"* - Lovely Banks, 2025
>
> *"At best, the Site is identified as being an area with potentially suitable habitat attributes for the VGED, and an area likely to meet the definition of habitat important for the VGED.5 Further, this conclusion is understood in the context of:*
>
> *(a) no VGED being found in either the Study Area or Strategic Assessment Area following a comprehensive survey program;*
>
> *(b) a desktop assessment of the Site's attributes against uncertain habitat criteria (as set out in Supporting Document B); and*
>
> *(c) such information on the Site's attributes being outdated (see paragraph 4.1 above).*
>
> *For the Site to contribute in any way to the VGED is extremely tenuous at best."* - Landowner of 135 Staceys Road

Response

The City undertook a detailed process to respond to these comments in finalising the Strategic Assessment (see Supporting Document E to the SAR). One of the key considerations of this process was uncertainty in the tangible value for VGED in retaining avoidance area C as part of the Northern Conservation Area. This uncertainty is due to a range of factors, including:

- The recent rediscovery of the species, and associated uncertainty regarding the ecology of the species
- That recovery efforts are in the early stages and priorities for the VGED recovery team are still developing
- The potential role of the Northern Conservation Area in the recovery of VGED through reintroduction remains unknown

The final proposed approach to VGED and the Northern Conservation Area is as follows:

- Avoidance area C has been removed from the Northern Conservation Area, and included within 'land subject to development' under the EPBC Plan
- The EPBC Plan will:
  - Continue to protect and manage the remaining portion of the Northern Conservation Area which will protect habitat potentially important for the recovery for VGED, and
  - Establish a VGED Trust to contribute to the recovery of the species, and compensate for impacts to VGED from the loss of habitat within Avoidance Area C

This outcome is considered to be appropriate for the Strategic Assessment as it:

- Makes an important contribution to the ongoing recovery of VGED
- Appropriately addresses impacts to habitat potentially important for the VGED in the NGGA
- Improves the financial viability of the Strategic Assessment and associated land development
- Addresses stakeholder concerns regarding the economic outcomes of the EPBC Plan

4.3.2 EASTERN CONSERVATION AREA

SUMMARY OF FEEDBACK

One landholder provided comments on the shape and functionality of the Eastern Conservation Area.

This included an alternative layout of the Eastern Conservation Area which aligns better with detailed precinct planning, and drainage requirements. The alternative proposal includes a land swap for an area of land adjacent to the Eastern Conservation Area and the Gully. The proposed area for the land swap is considered less optimal for development, and has lesser implications for the precinct planning.

The text box below provides an excerpt of some of these comments:

> *"The current configuration creates an irregularly shaped area of land planned for development to the south/southwest of the Eastern Conservation Area and Gully Avoidance Area that is not conducive to an efficient residential lot layout and limits flexibility in layout and orientation of the lots"*
>
> *"In relation to drainage, the current layout would require a dedicated treatment asset before discharge which would be limited to a drainage outfall pipe through the conservation area and land susceptible to slip"*
>
> *"Lovely Banks proposes an alternative layout that supports a more efficient and appropriate planning and infrastructure outcome whilst ensuring biodiversity values are protected. The alternative layout takes into consideration the natural topography of the area, the location of additional Striped Legless Lizard and Golden Sun Moth habitat for an offset site, connectivity of developable land with the rest of the precinct through appropriate road networks and the practicality of supporting infrastructure construction and maintenance"*
>
> - Lovely Banks, 2025

RESPONSE

The boundary of the Eastern Conservation Area has been revised in response to this comment.

The proposed land swap has been accepted although the final approach varies slightly from the proposal from Lovely Banks as follows:

- The land swap area will form part of the gully avoidance area, and will not be incorporated into the Eastern Conservation Area. The key objective of the Eastern Conservation Area is to avoid and protect Natural Temperate Grassland. Given that the land swap area does not support Natural Temperate Grassland, and will not contribute to offsets for this matter, it will not be managed as part of the Eastern Conservation Area. It is also noted that the revised layout of the gully avoidance area reduces drainage infrastructure requirements through this area to facilitate surrounding development
- The proposal from Lovely Banks included a recommendation that biodiversity values in the gully avoidance area are treated as an EPBC offset. This is discussed in more detail in Section 4.3.3. The final approach from the City does not account for offsets in the gully avoidance area. In turn, the offset requirement for Natural Temperate Grassland has increased to account for additional impacts from the land swap

It is noted that the land swap proposal was discussed in a workshop with the City, Lovely Banks, and DCCEEW. DCCEEW indicated that the land swap would be an acceptable revision to the strategic assessment.

4.3.3 PROTECTION OF THE GULLY AVOIDANCE AREA

SUMMARY OF FEEDBACK

A number of stakeholders commented on the level of protection for the gully avoidance area. In particular, submissions demonstrate concern that without stronger protections, mitigation measures and monitoring, biodiversity values in these areas may decline over time.

One landholder (Lovely Banks) provided an alternative proposal for the Eastern Conservation Area and the gully avoidance area which incorporates the biodiversity values of the gully avoidance area as part of the EPBC offsets package.

The text box below provides an excerpt of some of these comments:

"The commitments and measures applying to the Gully Avoidance Area are currently so weak as to be of limited practical value. No funding is provided for management of this area, despite the presence of Natural Temperate Grassland of the Victorian Volcanic Plain and Striped Legless Lizard" - CoolGeelong, 2025

"Without stronger protections aligned with those applied to the dedicated Conservation Areas and Cowies Creek, ecological values in the avoidance areas are likely to degrade over time, particularly as urban development introduces new pressures such as edge effects, invasive species, hydrological changes, human disturbance, light and noise pollution. As such, these areas may fail to demonstrate adequate avoidance" - DEECA, 2025

"A major question is how the avoidance areas will be implemented on the ground and what legal weight they will carry over time. We note with concern that the current draft lacked clear compliance mechanisms to ensure the City of Greater Geelong adheres to the promised avoidance measures. Simply put, without binding controls, there is a risk that the "avoidance" could be eroded or ignored as development pressures mount" - People for a Living Moorabool, 2025

"The commitments and measures applying to the Gully Avoidance Area are so weak as to be almost meaningless. No funding is provided for management of this area despite it having Natural Temperate Grassland of the Victorian Volcanic Plain and Striped Legless Lizard. The only tangible benefits are that native vegetation will be identified and some signs put up" - North West Alliance, 2025

"All designated avoidance areas (e.g. the Moorabool River corridor, Cowies Creek corridor, remnant grassland patches, etc.) should be zoned or overlayed for conservation in the planning scheme" - People for a Living Moorabool, 2025

"Without stronger protections aligned with those applied to the dedicated Conservation Areas and Cowies Creek, ecological values in the avoidance areas are likely to degrade over time, particularly as urban development introduces new pressures such as edge effects, invasive species, hydrological changes, human disturbance, light and noise pollution. As such, these areas may fail to demonstrate adequate avoidance" - DEECA, 2025

"In practice, this process [supporting infrastructure and services] *could allow CoGG to approve utility infrastructure within the Gully Avoidance Area. While such works may not directly impact SLL, they could still result in indirect impacts including habitat fragmentation, edge effects, or the creation of additional perching opportunities for predators"* - DEECA, 2025

"It is unclear whether habitat condition will be monitored or whether adaptive management responses would be triggered in the event of decline. This contrasts with proposed monitoring within the Northern and Eastern Conservation Areas and Cowies Creek

Corridor, where KPIs assess the extent to which Conservation Management Plan (CMP) objectives are being achieved" -DEECA, 2025

"We recommend that the final EPBC approval explicitly list the avoidance areas and stipulate that no urban development or clearing is permitted within them to remove any uncertainty when precinct-scale plans are later prepared. It would also strengthen Council's hand in resisting future pressures to rezone or nibble into these areas. The community must have confidence that "avoidance" means permanent avoidance – not deferment of impact to a later date" - People for a Living Moorabool, 2025

In summary, we call for unambiguous and enforceable planning controls for all avoidance areas, and for their scope to fully cover the habitats of MNES and other threatened species. Avoidance should be the floor, not the ceiling, of environmental commitment – i.e. the least that will be done, with potential to do more (such as active restoration or expansion, as resources permit). By removing ambiguity now, the Strategic Assessment can provide certainty that these vital natural assets, the Moorabool River, its floodplain woodlands and grasslands, and other ecological hotspots, will remain protected no matter how the growth areas develop around them." - People for a Living Moorabool, 2025

Furthermore, LBDG are seeking statutory protection (rather than theoretical protection through avoidance) of the gully avoidance area (Area A) such that it is recognised as an offset site in combination with Areas D and X (refer to Figure 2). - Lovely Banks, 2025

RESPONSE

The City has considered these submissions, and determined that the gully, while suitable for avoidance, is not appropriate for formal protection as an offset under the strategic assessment. This is due to the size of the area, the fragmented nature of values to be retained and a related concern of its ability to support a viable long-term population of GSM and SLL.

However, the City has identified the gully avoidance area as encumbered land unsuitable for development, providing an opportunity for further avoidance of biodiversity values.

Following exhibition of the Strategic Assessment in November/December 2025, significant additional drainage services work has been undertaken concurrently with the preparation of the Elcho Road East PSP and the response to submissions. This work has further clarified the drainage design and the extent of hydrological change, and the City now has greater confidence that the values within the area can be retained.

In addition, revision of the shape of the gully avoidance area (resulting in a larger and more consolidated area) provides the added benefit of reducing planned residential development within the low-lying areas of the gully. Together with the updated drainage services work, these changes have clarified infrastructure routing requirements and provided certainty that impacts within the gully avoidance area can be avoided.

It is also noted that while this area does not qualify as a formal EPBC offset, the Funding Program has allocated resources for management works to maintain its values.

Overall, securing additional offsets external to the Growth Area, combined with avoidance of the gully avoidance area, is considered to deliver a stronger conservation outcome than designating the gully as an offset alone.

4.4 WESTERN GEELONG GROWTH AREA

4.4.1 MOORABOOL RIVER CORRIDOR AND MOORABOOL AVOIDANCE AREA

There are a number of issues relevant to the Moorabool River, including:

- Width of the Moorabool River Corridor
- Location of stormwater infrastructure
- Artificial river diversion
- Status of the Moorabool River corridor
- Status of the Moorabool avoidance area

WIDTH OF THE MOORABOOL RIVER CORRIDOR

Summary of feedback

A key theme from both the 2023 and 2025 submissions was concern regarding the width of the Moorabool river corridor. Submitters commented that the Moorabool river corridor should be at least 100 metres wide at a minimum, with several submissions advocating for a 200-metre riparian corridor.

The text box below provides an excerpt of some of these comments:

> *"Conservation buffers along waterways need to be a minimum 200m"* - Submitter 11, 2023
>
> *"The Plan shows a Strategic Conservation Area along the Moorabool River of only 50m to 100m wide. this needs to be consistently 200m along the whole length. Choke points that compromise the ecological function of the entire system must be avoided"* - Submitter 14, 2023
>
> *"The currently proposed 100 metre buffer needs to be confirmed as a minimum standard"* - People for a Living Moorabool, 2025
>
> *"An "on average 100 m" corridor, as originally proposed, risks creating choke points that limit fauna movement. A wider corridor with no pinch-points is needed so that nature has space to move" "* - People for a Living Moorabool, 2025
>
> *"PALM recommends that 100 m be treated as the baseline buffer width along the Moorabool River, with every opportunity taken to expand from this minimum. All areas of ecological value including both existing native vegetation patches and potential habitat restoration zones on the river flats and escarpments, should be incorporated into the conservation corridor"* - People for a Living Moorabool, 2025

Response

The 100 m Moorabool River corridor is considered to be appropriate. The current landscape management practices means that along the riparian corridor in the WGGA, native vegetation has only been retained within 20-50 m of the river. The designation of 100 m for conservation will prevent further actions within this area which may directly or indirectly impact the Moorabool.

It is also noted that the Plan includes the Moorabool avoidance area, with the key aim to support the potential MNES values of the Moorabool River and escarpment. The avoidance area adjoins the river corridor, and increases the size of the overall area avoided from intensive development along the river.

LOCATION OF STORMWATER INFRASTRUCTURE

Summary of feedback

Some environment and community groups expressed concern on the location of stormwater retention and treatment infrastructure. These submissions express that these assets must be located outside of the Moorabool river corridor and the Moorabool Avoidance Area, and rather sit within the boundaries of the urban development.

The text box below provides an excerpt of some of these comments:

> *"All stormwater retention and treatment infrastructure must be kept outside the designated river buffer and Moorabool River avoidance area to maintain the ecological integrity of the Moorabool River corridor"* - People for a Living Moorabool, 2025
>
> *"PALM strongly advocates that all stormwater retention basins, wetlands, treatment ponds and associated drainage infrastructure be fully excluded from the Moorabool River corridor and instead sited wholly within the boundaries of the urban development footprint"* - People for a Living Moorabool, 2025
>
> *"Despite references in the Strategic Assessment Plan to a 100 m buffer along parts of the Moorabool River, there is currently no explicit commitment to keep stormwater infrastructure out of this corridor"* - People for a Living Moorabool, 2025
>
> *"We stress that stormwater infrastructure should not be considered an acceptable use within the Moorabool River corridor. Such infrastructure, when located adjacent to waterways, can introduce significant and cumulative impacts, including:*
>
> - *Altered flow regimes, increasing erosive pressures on the river channel,*
> - *Reduced water quality from occasional overflows or design limitations,*
> - *Loss of valuable terrestrial and riparian habitat due to engineered surfaces,*
> - *Disruption of cultural landscapes and community access to natural spaces"*

- People for a Living Moorabool, 2025

"No direct stormwater discharges to the Moorabool River or its tributaries should be permitted unless unavoidable, and only if preceded by rigorous treatment, detention and flow attenuation upstream" - People for a Living Moorabool, 2025

"We support the comments submitted by PALM and urge the City of Greater Geelong and its planning partners to… Exclude stormwater infrastructure from all parts of the river corridor and associated floodplain and escarpment areas" - Batesford, Fyansford, Stonehaven Landcare, 2025

Response

The Moorabool avoidance area and Moorabool river corridor are within the Batesford North precinct under the Northern and Western Geelong Growth Area Framework Plan. The Precinct Structure Plan (PSP) process will determine stormwater management system requirements and asset distribution for the precinct. This will be informed by detailed drainage works in combination with Moorabool River Technical Study. The Moorabool River Technical study will address the potential for impacts to MNES within the downstream catchment and inform mitigations to be implemented via the PSP.

The City is confident that it will be able to ensure the PSP locates stormwater drainage basins and wetlands away from the avoidance and conservation areas on the higher, developable ground to the east. However, due to topography there may be a requirement for treated stormwater to pass through the area down to the Moorabool flood plain and into the river as the receiving water course. Stormwater flows will be kept to pre-development rates (velocity) and water quality treatment will occur to the appropriate standards. Technical drainage investigations will occur in the first stage of PSP preparation which is expected to commence in 2027 and the drainage situation will be clearer then.

ARTIFICIAL RIVER DIVERSION

Summary of feedback

A key theme from 2023 submissions was how the strategic assessment responds to the artificial river diversion of the Moorabool River downstream of the WGGA.

The text box below provides an excerpt of some of these comments:

"It is important for GSA documentation to acknowledge the impact of this artificial river diversion, formally endorse the planned restoration and provide pathways for funding the work through EPBC or developer levies. Future plans for this quarry involve its problematic 'rehabilitation' to create a lake in the Western Growth Area (south of the Midland Highway) utilising ground water and water from the River. Having in mind the fragility of the Moorabool River and the forecasts and current realities of a warming climate, this would be extremely problematic for the health and integrity of the River and associated biodiversity and ecosystems." - Batesford, Fyansford, Stonehaven Landcare Group, 2023

"It is vitally important that the Geelong Strategic Assessment documentation acknowledges this critically important and wholly unacceptable impact and formally endorses the comprehensive restoration of the affected sections, such restoration being funded by way of EPBC or developer levies." - Submitter 21, 2023

"The Moorabool has been recoursed twice to allow access to limestone for quarrying. The earliest of these sections was done in the 1930s and is in severe disrepair. Significant amounts of streamflow are lost through broken concrete, much of it ending up in the quarry only to be pumped out further downstream. This results in a reach of the river that can be dry for months of the year, impeding the migration of many instream species. It is important for the Geelong Strategic Assessment documentation to acknowledge this impact, formally endorse the planned restoration and provide pathways for funding the repair and restoration work needed. - Submitter 39, 2023

"The plan should be to repair and modify the broken concrete section of the Moorabool River using developer funds and conduct other necessary works to extend the distribution of these endangered species from known locations in the Barwon-Moorabool system through the system into suitable habitats. Further, strict controls should be placed on urban development so that run-off from streets etc do not further damage the river. Given that limestone from the Fyansford quarry provided much of the cement to build Geelong, its people owe the river a substantial debt, and developers and new residents who will benefit from Geelong's growth should pay for necessary river repairs. The Strategic Assessment Funding Program should contain an estimate of the cost of doing so." - People for a Living Moorabool, 2023

Response

The downstream river diversion is not within the scope of the strategic assessment. This will be managed through planning for the Batesford South precinct, which will include a rehabilitation master plan.

However, it is noted that the river diversion will likely be addressed at a higher level through the strategic assessment under Commitment 15. The associated measures require a technical water study for the Moorabool River, which will provide recommendations for MNES in the Moorabool River.

Status of the Moorabool River corridor

Summary of feedback

The Moorabool River corridor was identified to protect state and local biodiversity values through the BCS. However, it was not identified in the Plan as being required for the protection of MNES.

Some stakeholders provided comments on this matter, questioning why the Plan has not designated the Moorabool River corridor as a strategic conservation area. Particularly given the context of downstream MNES values which have the potential to extend upstream in the future.

The text box below provides an excerpt of some of these comments:

> *"Excluding the Moorabool corridor, including the floodplains and escarpment from full conservation status simply because certain federally listed species were not recorded in that exact reach is a short-sighted decision. This reach of the river clearly supports state-significant values (e.g. remnant vegetation and native fish) and provides connectivity for EPBC-listed species upstream and downstream (e.g. Australian Grayling have historically been present downstream but will likely extend upstream once the issue of the Batesford Quarry is resolved). We therefore question why the Plan has not designated the entire Moorabool River corridor including floodplains and escarpment as a strategic conservation area to be protected and managed equivalently to other offsets, rather than having sections of it as a lesser avoidance area"* - People for a Living Moorabool, 2025
>
> *"A major question is how the avoidance areas will be implemented on the ground and what legal weight they will carry over time. We note with concern that the current draft lacked clear compliance mechanisms to ensure the City of Greater Geelong adheres to the promised avoidance measures. Simply put, without binding controls, there is a risk that the "avoidance" could be eroded or ignored as development pressures mount"* - People for a Living Moorabool, 2025
>
> *"We support the comments submitted by PALM and urge the City of Greater Geelong and its planning partners to… Confirm the Moorabool River Conservation Area as a formal strategic conservation area with long-term statutory protection"* - BFS Landcare, 2025
>
> *"Seeking clarification: It is not entirely clear from the documentation how "avoidance areas" differ from formal conservation reserves or offsets. For example, besides the main one covering the floodplain and escarpment, the Moorabool River corridor is seemingly identified as an avoidance area (sometimes termed the Moorabool River Conservation Area in other maps) in the Western Growth Area. Yet the text of the draft EPBC Plan indicated this corridor was not deemed necessary to protect MNES, and thus it appeared to be assigned a different status than other strategic conservation areas. PALM finds this approach concerning"* - People for a Living Moorabool, 2025

Response

The EPBC Plan has been amended to clearly identify the Moorabool River corridor as a strategic conservation area. The EPBC Plan also clarifies that the delivery of the Moorabool River corridor is provided for in the BCS, given that the area was not identified to support current known MNES.

The BCS includes a commitment to prepare a Conservation Management Plan for the Moorabool River corridor. The CMP will provide for the protection and ongoing management of the biodiversity values of the Moorabool River corridor.

The key difference between the Moorabool River corridor, and the remaining three strategic conservation areas, is that the Moorabool river corridor does not compensate for impacts to MNES or provide avoidance for MNES, and therefore is not funded through the biodiversity levy for the implementation of the EPBC Plan. However, the Moorabool River corridor will be established (and funded) through PSP planning for the Batesford North precinct. This is assured through the commitments in the BCS.

STATUS OF THE MOORABOOL AVOIDANCE AREA

Summary of feedback

Following the inclusion of the Moorabool avoidance area into the layout for the 2025 exhibition documents, there were a number of comments on the long-term security and level of connection for the avoidance area.

Some community and environment groups have called for stronger protection of the Moorabool avoidance area. Simultaneously, some landholders have opposed the avoidance area.

The text box below provides an excerpt of some of these comments:

"We have concerns about the long-term security of the Moorabool Avoidance Area. Given that developers are likely to continue seeking opportunities to encroach on this land, we urge Council to ensure that the legal and policy protections for this area are as robust as possible. Strong scaffolding is needed to prevent incremental loss of this area and to ensure its ongoing ecological management" - CoolGeelong, 2025

"We therefore question why the Plan has not designated the entire Moorabool River corridor including floodplains and escarpment as a strategic conservation area to be protected and managed equivalently to other offsets, rather than having sections of it as a lesser avoidance area" - People for a Living Moorabool, 2025

"All designated avoidance areas (e.g. the Moorabool River corridor, Cowies Creek corridor, remnant grassland patches, etc.) should be zoned or overlayed for conservation in the planning scheme " - People for a Living Moorabool, 2025

"Villawood continues to oppose the nomination of an avoidance area in Batesford North. While we acknowledge that the documents state this area is subject to refinement during future PSP preparation, we see no ecological or planning rationale for its nomination at this time. Survey data has not identified legless lizards or suitable habitat in this area. Prematurely locking away this land risks undermining its future value for open space or drainage, both of which may be critical as the precinct develops. We strongly recommend that the avoidance area designation be deleted until there is clear, evidence-based justification" - Villawood, 2025

"Monitoring and Enforcement Framework: We ask that the final Strategic Assessment include commitments to ongoing monitoring and compliance reporting for all conservation and avoidance areas. The community and independent regulators should be able to track that no unauthorised incursions or vegetation removals occur in these zones. If the EPBC Plan is approved, its conditions should bind the City to maintain the integrity of avoidance areas. We note that past development in Geelong has sometimes failed to deliver on paper promises – the environment often "wears the risk, while developers get the certainty". To avoid this outcome, the Plan must bake in accountability. For example, the City could be required to produce annual public reports on the status of NWGGA conservation areas, or an oversight committee could be established to review implementation. At minimum, the absence of explicit Commonwealth compliance checkpoints in the draft is an issue to be rectified" - People for a Living Moorabool, 2025

"Without stronger protections aligned with those applied to the dedicated Conservation Areas and Cowies Creek, ecological values in the avoidance areas are likely to degrade over time, particularly as urban development introduces new pressures such as edge effects, invasive species, hydrological changes, human disturbance, light and noise pollution. As such, these areas may fail to demonstrate adequate avoidance" - DEECA, 2025

"It is unclear whether habitat condition will be monitored or whether adaptive management responses would be triggered in the event of decline. This contrasts with proposed monitoring within the Northern and Eastern Conservation Areas and Cowies Creek Corridor, where KPIs assess the extent to which Conservation Management Plan (CMP) objectives are being achieved." - DEECA, 2025

"We recommend that the final EPBC approval explicitly list the avoidance areas and stipulate that no urban development or clearing is permitted within them to remove any uncertainty when precinct-scale plans are later prepared. It would also strengthen Council's hand in resisting future pressures to rezone or nibble into these areas. The community must have confidence that "avoidance" means permanent avoidance – not deferment of impact to a later date" - People for a Living Moorabool, 2025

In summary, we call for unambiguous and enforceable planning controls for all avoidance areas, and for their scope to fully cover the habitats of MNES and other threatened species. Avoidance should be the floor, not the ceiling, of environmental commitment – i.e. the least that will be done, with potential to do more (such as active restoration or expansion, as resources permit). By removing ambiguity now, the Strategic Assessment can provide certainty that these vital natural assets, the Moorabool River, its floodplain woodlands and grasslands, and other ecological hotspots, will remain protected no matter how the growth areas develop around them." - People for a Living Moorabool, 2025

Response

In response to the submissions, the City will insert an additional project into the Strategic Assessment Funding Program to fund investigations and preparation of a strategy or plan for the Moorabool river corridor and Avoidance areas. It is expected that this work would be undertaken after the Strategic Assessment is approved under the EPBC Act and in parallel with the Batesford North PSP preparation.

4.4.2 COWIES CREEK AND GROWLING GRASS FROG

There were a number of issues raised relevant to Cowies Creek and Growling Grass Frog (GGF). These include:

- Boundary / width of the conservation area
- Protection of the tributary
- Public access
- Other miscellaneous comments on Cowies Creek

BOUNDARY / WIDTH OF THE CONSERVATION AREA

Summary of feedback

A key theme from both the 2023 and 2025 submissions was concern regarding the width and boundary of the Cowies Creek corridor. A number of comments call for a corridor width of 200 m for Cowies Creek (based on the Growling Grass Frog Significant Impact Guidelines (DEWHA, 2009)). Conversely, landholders have requested a maximum corridor width of 100 m, or less where possible.

Landholders have also requested that the boundary of the conservation area be finalised as soon as is possible.

The text box below provides an excerpt of some of these comments:

"Cowies Creek should be protected by terrestrial corridors of up to 200m width to ensure viable population in the longer term. Also permanent removal or degradation of terrestrial habitat within 200m of a water body is considered a significant impact" - Batesford, Fyansford, Stonehaven Landcare Group, 2023

"Overall, we argue that the land set aside for Growling Grass Frog along Cowies Creek is insufficient, and that the boundary reflects developer pressure rather than conservation considerations" - North West Alliance, 2025

"Insufficient land has been set aside for Growling Grass Frog along Cowies Creek, and current boundaries appear to reflect development considerations rather than conservation needs" CoolGeelong, 2025

"Conservation area boundaries should also not extend beyond the 100 metre buffer line unless there is a sound rationale for doing so" - Bisinella, 2025

"It is Bisinella Developments' position that the boundary of the CCCA should be finalised as far as practicable now, and based on information available to Council now. It is both unnecessary and inefficient to require further ecological studies for boundary revisions where existing work… already provides a sound basis for decision-making" - Bisinella, 2025

"… the rationale for extending the CCCA beyond the specified 100 metre buffer has not been clearly articulated, and an evidence-based rationale for this extension should be provided before the boundary is finalised" - Villawood, 2025

"This scenario was assessed against the default 200 metre buffer recommended by DEWHA (2009) using the EPBC Act offset calculator, and the analysis demonstrated that a narrower buffer could achieve equivalent ecological outcomes without residual adverse impacts. While the SAR cites a break of slope at around 100 metres as justification for the current 100 metre buffer, TactEcol notes that this feature does not occur within the Bisinella Land and there is no material change in habitat quality at that distance" - Bisinella, 2025

"TactEcol Consulting (2022 and 2025) provide further information, references and ecological rationale as to why extending the width of the terrestrial habitat buffer beyond 65 m (e.g. 100 m) would be likely to have very few, if any ecological benefits for GGF, relative to a 65 m buffer that includes the funded creation of offstream GGF wetlands. We note the current wording of the SAR and related documents appears to support (in theory and based on existing conditions) a material narrowing of the corridor width when associated with the provision of offstream wetland habitat; namely, it would maintain 'an appropriate corridor width to protect terrestrial habitat and buffer the instream habitat for Growling Grass Frog', whilst including the critically important measure of the creation of offstream wetland habitat." - Bisinella, 2025

"The EPBC Act policy statement Significant Impact Guidelines for Litoria raniformis (DEWHA 2009) states that permanent removal or degradation of terrestrial habitat (such as between ponds, drainage lines or other temporary/permanent habitat) within

200m of a water body is considered a significant impact. The future viability of key metapopulations of Growling Grass frogs(GGF) on Cowies Creek requires the protection of a 200m conservation zone that allows the GGF to use terrestrial habitat." - Friends of Cowies Creek, 2023

"It is completely unacceptable that 'the boundaries of the Cowies Creek Conservation Area are indicative in the Plan and will be finalised during precinct planning through the preparation of the Creamery Road PSP'." - North West Alliance, 2023

"We have undertaken a preliminary revised offset calculation, based on the current proposed width of the Cowies Creek conservation corridor, being a 100 m buffer as outlined in the draft documentation. Relative to the 200 m default buffer (564% offset), the 100 m buffer results in a terrestrial habitat offset of approximately 295%." - Bisinella, 2023

Response

The Strategic Assessment Report provides the following context for the width of the riparian corridor (see Section 19.2.4):

> *"The topography of Cowies Creek and current land use within the Creamery Road Precinct is not conducive to a buffer distance of 200 m. There is a significant break of slope at approximately 100 m from the creek line at parts of the creek corridor, which is likely to represent the edge of the potential terrestrial habitat for the species. Beyond the break of slope there are significant areas of cropping and a lack of suitable habitat. This suggests that a layout that is based on the break of slope as the edge of the conservation area is appropriate. This would maintain an average corridor width of approximately 100 m from the stream and given the current use of Cowies Creek by the species is considered appropriate for the long term protection of the population in the WGGA."*

In addition, it is noted that the Plan includes a Commitment (9) that ensures the conservation area "*will be established in perpetuity to avoid and protect habitat needed to support the continued persistence of the Growling Grass Frog and potential habitat for Glossy Grass Skink in the WGGA*".

Although the GGF Significant Impact Guidelines recommend buffer zones of at least 200 m around water bodies, and dedicated terrestrial habitat corridors of at least 100 m to be retained, the specific landscape context of the WGGA is not conducive to this approach.

The boundary of the Cowies Creek Conservation Area will be finalised through PSP planning for the Creamery Road Precinct. PSP planning is nearing completion, and the revised CMP for Cowies Creek is well progressed.

As part of these two concurrent processes there have been iterative updates to the Conservation Area boundary which have aimed to balance development and conservation outcomes. These include adjustments to the Conservation Area Boundary on Villawood (20 Evans Road) and Bisinella land (30–35 Avonlea Road) which have occurred in accordance with the relevant provisions of the Plan and BCS. The final boundary has also been informed by a Cowies Creek CMP workshop which has ensured that the boundary allows sufficient space for the creation of offline dedicated Growling Grass Frog Wetlands.

Adjustments on Villawood land involved minor revision of the boundary with regard to topography. Small areas of land removed above the break of slope of the waterway and substituted with land below the break of slope which is more likely to benefit conservation outcomes. The total area extent of the Conservation Area on the Villawood land is consistent with that of the original 100 m buffer.

The City has finalised three minor revisions to the Cowies Creek Conservation Area on Bisinella land. This includes two revisions to increase the Conservation Area, incorporating native vegetation and extending it to the 100 m buffer. An additional revision changes an irregular extension of the conservation area to development land in response to Bisinella Developments' 2025 submission.

Near its confluence with Cowies Creek the unnamed tributary falls within the Conservation Area boundary. Outside of the Conservation Area the unnamed tributary has been incorporated into the drainage design for the CRPSP. Under the revised CMP this tributary will convey treated stormwater. This stormwater is in turn to be used as a source of water for a permanent offline dedicated Growling Grass Frog wetland.

PROTECTION OF THE TRIBUTARY

Summary of feedback

There is a small tributary in the WGGA which runs south-west from Cowies Creek. A number of comments from environment and community groups called for the protection of this tributary, given its potential value for GGF.

Meanwhile landholder submissions expressed that wetland habitat can be created in the existing Cowies Creek Conservation Area, and is not required in the tributary.

The text box below provides an excerpt of some of these comments:

"The ephemeral creek running south of Cowies Creek labelled as a "landscape connection" should be incorporated into the Conservation Area. It is most likely well-used by the Growling Grass Frog metapopulation for foraging. When wet, it may provide breeding areas" - North West Alliance, 2025

"Also on p. 181 of the SAR, we note the consideration of the ephemeral stream that runs into Cowies Creek in the precinct, and the 'potential for that area to provide additional habitat for the species'. We concur, and suggest that this tributary may be suitable for the provision of ephemeral or semi-permanent waterbodies, e.g. by excavating and potentially lining deeper sections, that would fill following periods of rainfall. Importantly, any such wetlands could be designed so as to periodically dry out; e.g. in drier than average years. Periodic wetland drying can remove predatory fish and potentially reduce the prevalence of the amphibian chytrid fungus Batrachochytrium dendrobatidis, and ephemeral wetland habitats can support large breeding events under favourable conditions (J. Urlus, unpub. data)." - Bisinella, 2023

"While TactEcol supports the creation of wetland habitat within the tributary, this can be achieved within the existing CCCA and does not require additional land" - Bisinella, 2025 (informed by TactEcol)

Response

The Creamery Road Precinct also includes a small tributary of Cowies Creek (running south-west from the north-east corner of the precinct). The draft Conservation Management Plan (CMP) for the Cowies Creek Conservation Area (Biosis, 2026) states that the tributary is unlikely to provide breeding habitat for GGF. It is narrow and incised and on a steep gradient such that surface water flows are likely to occur only in the immediate period after rainfall events and open-water pools will not occur or persist. AECOM (2025) were also of the view that the tributary is mostly dry with no standing or flowing water. They noted that there is minimal shelter (logs or rocks), and opportunities for population movement or expansion are limited at present.

The boundary of the conservation area will be finalised through the precinct structure planning process for the Creamery Road precinct. At the time of finalising this assessment report, the precinct structure planning process was substantially progressed and the boundary of the conservation area shown in the Plan is expected to be the final boundary.

PUBLIC ACCESS

Summary of feedback

Some stakeholders have requested community and cultural access to the Cowies Creek corridor. This includes low impact trails for community use, and cultural access for the Wadawurrung. Simultaneously, environment groups have expressed concern over the proposed bike path and how this will affect habitat for Growling Grass Frog.

The text box below provides an excerpt of some of these comments:

"We recommend that Council review its current approach to entirely locking off Cowies Creek. Instead, we suggest that provision for low-impact access at carefully controlled points be incorporated into the associated Landscape Masterplan" - Villawood, 2025

"Habitat has been provided mostly on the south side of the creek, with inadequate provision on the north side, compounded by a proposed bike path that will further diminish available habitat" - CoolGeelong, 2025

"…a bike path is proposed on the north side of the Creek, further diminishing the little space set aside for habitat there" - North West Alliance, 2025

"We appreciate that the primary function of the Cowies Creek corridor is for Growling Grass Frog protection. However, it is inevitable that people will seek to access this area. Providing low-impact trails is the best way to manage this, ensuring that access is controlled and does not undermine conservation outcomes. In addition, we understand that access for cultural activities is an expectation of the Wadawurrung, and as such this should be explicitly provided for in the CMP" - Villawood, 2025

"Human access should only be provided in loop tracks that enter to a restricted area" - Friends of Bannockburn Bush, 2023

Response

General public access to the Conservation Area will be limited to protect the biodiversity values of the creek. There will be opportunities for appropriate access for management, and cultural land use, which will be clarified in the Cowies Creek Conservation Management Plan.

It is noted that there is a trail located on the interface between the Conservation Area and the broader Growth Area. This trail provides opportunities for appropriate connection with the creek corridor, without compromising conservation outcomes.

Other comments on Cowies Creek

There were a range of other comments on Cowies Creek. These comments, and responses from the City, are provided in the table below.

Table 5: Specific comments on Cowies Creek

Comment	Response
"Further information is also needed regarding the impact of increased flows on Growling Grass Frog habitat, and we would welcome investigation of actions within the growth area to reduce predicted flow increases." - CoolGeelong, 2025	Management of downstream impacts on Cowies Creek will be addressed by the implementation of Measure 60 under the EPBC Plan. Measure 60 will ensure that stormwater infrastructure and ongoing stormwater management considers the Growling Grass Frog Habitat Design Standards (DELWP, 2017) and any other relevant advice or standards to minimise potential adverse impacts to habitat for the Growling Grass Frog within downstream reaches of Cowies Creek.
"Given the likely increased flows in Cowies Creek due to development, we would like to know what further actions could take place within the NGGA to reduce the increased predicted flows. We would like these actions investigated and solutions incorporated into the plan." - North West Alliance, 2025	Management of downstream impacts on Cowies Creek will be addressed by the implementation of Measure 60 under the EPBC Plan. Measure 60 will ensure that stormwater infrastructure and ongoing stormwater management considers the Growling Grass Frog Habitat Design Standards (DELWP, 2017) and any other relevant advice or standards to minimise potential adverse impacts to habitat for the Growling Grass Frog within downstream reaches of Cowies Creek.
We would also like to see City of Greater Geelong take additional actions to protect the reaches of Cowies Creek north of the rail line, outside NGGA. - North West Alliance, 2025	Noted. Protecting the northern reaches of Cowies Creek outside of the Growth Area is not within the scope of the NWGGA Strategic Assessment.
"It is also unclear if any Growling Grass Frog surveys have been conducted in this area [the ephemeral tributary]. *Further information should be provided."* - North West Alliance, 2025	EHP did not survey the tributary, and did not map areas of suitable habitat. As outlined above (see Section 4.4.2), the SAR concludes that the tributary is unlikely to provide breeding habitat for GGF, and there are limited opportunities for dispersal.

Comment	Response
"Whilst we recognise that Council is continuing to explore the appropriate trigger points for the delivery of GGF ponds, we emphasise that this work needs to be expedited in close collaboration with Villawood. The timing and construction of these ponds must be aligned with development feasibility—not solely with perceived environmental impacts. If the requirements for pond delivery are set without regard to the realities of project staging and funding, there is a risk that development could be delayed or rendered unviable."- Villawood, 2025	The City facilitated a dedicated workshop on the Cowies Creek CMP following the 2025 public exhibition period. As discussed in this workshop, the CMP will specify the timing and triggers for construction of ponds. It is noted that the City will allow for relevant stakeholders to review and provide feedback on the CMP.
"It is essential that the updated mapping for the Cowies Creek corridor, as prepared by Villawood with comprehensive engineering input, is included in the final document submitted for approval. This mapping has been specifically designed to ensure that servicing and drainage can be delivered without creating trapped low points, which would cause significant future implementation issues. We understand from email correspondence with Council that updating the mapping to align with Villawood's is Council's intent" - Villawood, 2025	The boundary has been updated in response to Villawood's submission. These updates are reflected in the draft Creamery Road PSP.
"The claim of a break of slope appears to refer to land to the west of the subject site. Within the subject site there is no break of slope nor previous cropping at around 100 m from the creekline. Plate 1 below shows Cowies Creek in the mid-ground, and the break of slope looking to the southwest—the tree at the centre right of the top of the hill (i.e. break of slope) occurs approximately 170 m from the creekline, while the small group of trees at the centre left of the top of the hill occurs over 250 m from the nearest point on Cowies Creek. For this reason, the nomination of a 100 m buffer within the subject land appears to be arbitrary and to not have a topographical or ecological justification." - Bisinella, 2023	The text in the SAR has been revised slightly to clarify that "there is a significant break of slope at approximately 100 m from the creek line at parts of the creek corridor, which is likely to represent the edge of the potential terrestrial habitat for the species. " Discussion on the 100 m buffer is provided above in Section 4.4.2
"These outcomes and purposes are laudable; however, in our opinion, a plan that doesn't include a specific commitment to develop a series of best-practice, dedicated wetlands for GGF along Cowies Creek cannot confidently claim to mitigate and offset the potential impacts sufficiently to ensure the long-term viability of the local meta-population. This is particularly the case given the development of the surrounding catchment and the uncertainty associated with what that means for hydrological flows, water quality, and a variety of other disturbances and habitat perturbations."- Bisinella, 2023	The 2025 re-exhibited documentation outline the requirements for GGF wetlands. This includes: • Measure 43: Include objectives in the Conservation Management Plan that are consistent with... Providing for the creation of off-stream habitat, where appropriate and beneficial to the species • Measure 47: Confirm the habitat enhancement works for Growling Grass Frog downstream of the WGGA through a process of detailed design. Works to be considered to include... The creation of one or more off-line wetlands to create habitat for the species
"The Plan commits to the completion of additional hydrological studies to understand key risks from development to Matters of National Environmental Significance (MNES) which are associated with key waterways including Cowies Creek (Section 5.5.3 of the Plan). *The strategic assessment process is intended to be a streamlined process resulting in regulatory efficiencies. The strategic assessment documentation has already identified that a buffer zone of more than 100m along Cowies Creek is not sensible due to the topography and lack of habitat. It has also committed that best practice guidelines will be applied to manage stormwater runoff and light pollution. Based on these requirements, it is*	Measure 57 requires "relevant technical studies to understand the key risks from development on protected matters associated with Hovells Creek and the Moorabool River." The technical water studies are not required for Cowies Creek.

Comment	Response
unclear what additional benefit for MNES would be gained from further technical studies of Cowies Creek in this instance. This is supported by the findings of the Strategic Impact Assessment Report, which states there will be no residual adverse impact to the Growling Grass Frog if these precautions are taken. As such, the need for further studies of Cowies Creek to result in an improved / different outcome is questionable."- Yih Sheng, 2023	
"We are particularly concerned that, without a finalised CMP, there is a significant risk that the Commonwealth may be unable to approve the Strategic Impact Assessment (SIA). The number, location, and design of Growling Grass Frog (GGF) ponds are evidently of high importance to both the City and federal authorities, as these elements are central to demonstrating that the impacts of development on the species (if any) are tolerable and can be effectively managed" - Villawood, 2025	A finalised CMP is not required for submission of the final documents to DCCEEW for approval. The EPBC Plan includes a Commitment (10) to prepare and implement the CMP for the Cowies Creek Conservation Area. The associated measures provide clarity on the content and objectives of the CMP. This approach is consistent with the two strategic conservation areas in the NGGA.

4.5 PLAN IMPLEMENTATION

4.5.1 LAND ACQUISITION TIMELINE

SUMMARY OF FEEDBACK

The timing for land acquisition was raised by a number of stakeholders.

For a number of community and environment groups, there is concern regarding the amount of time prior to land acquisition in which the conservation areas won't be managed. Further, there is a potential / perceived risk that delay in acquisition de-incentivises positive land management to retain ecological values. It was also noted that the Commonwealth offset policy places a higher value on offsets delivered in advance.

In addition, landowners with properties within the Strategic Conservation Areas have requested that acquisition be undertaken as early as possible.

The text box below provides an excerpt of some of these comments:

"Under the current documentation, land intended for conservation will not be purchased until the Precinct Structure Plan process is completed and adjacent subdivision occurs. This means conservation areas, particularly the Northern Conservation Zone, may remain unmanaged for many years. This is a significant concern. A key lesson from the Melbourne Strategic Assessment is that conservation land cannot remain in private hands once landholders have no incentive to manage it. While upfront purchase involves considerable cost, it delivers savings on weed management and removes the risk of properties being sold to third parties or the potential for loss-on-sale litigation" - CoolGeelong, 2025

"We understand that upfront purchase is expensive, but cost savings on weed management are significant, and the risk to conservation values is too high for this action to not be undertaken" - North West Alliance, 2025

"A key lesson from the Melbourne Strategic Assessment is that delays in transferring land from the original owners to the final management authority resulted in significant degradation of habitat. Owners have no incentive to carry out any management of their land and the ecological value of the sites becomes degraded" - Geelong Field Naturalists Club, 2025

"If acquisition is not advanced (ie, within 5 years) then there is little to no point in acquiring the Site for conservation purposes at all" - Landowner of 135 Staceys Road, 2025

RESPONSE

The EPBC Plan includes a set of commitments and measures relating to the purchase or acquisition of conservation areas. These relate to the:

- Northern Conservation Area, which will be purchased in two stages as follows:
  - Stage 1 - which will be purchased within the first five years of Plan implementation. These areas were identified in the NWGGA Framework Plan as land for future conservation, and are currently in the Farming Zone. These properties have been prioritised for early acquisition by the City due to their high biodiversity value and economic feasibility
  - Stage 2 - which will be acquired at the time of sub-division. Stage 2 is located within the Urban Growth Zone, and was added to the Northern Conservation Area through the first SDM process. Given the financial implications of acquiring land which is urban growth zoned, acquisition at the time of subdivision is considered appropriate
- Eastern Conservation Area, which will be acquired within the first five years of Plan implementation
- Cowies Creek Conservation Area, which will be progressively transferred to Council as the adjoining land develops

The timing and mechanisms in the EPBC Plan to secure the Conservation Areas are considered appropriate. Delivery of Stage 1 of the Northern Conservation Area, and the Eastern Conservation Area, within the first five years of Plan implementation represents early acquisition.

4.5.2 INTERIM MANAGEMENT OF BIODIVERSITY VALUES

SUMMARY OF FEEDBACK

The need for stronger interim management of biodiversity values on land designated for conservation was a key theme from both the 2023 and 2025 submissions. This is of particular importance to a number of community and environment groups, DEECA, and DCCEEW.

The text box below provides an excerpt of some of these comments:

"Immediate action must be taken to prevent habitat degradation during the time required for the City of Greater Geelong to purchase land" - submitter 9, 2023

"It is essential that an interim management strategy is established. It should have strong incentives and controls that will deliver good conservation outcomes for these designated grasslands and waterways to ensure their continued survival and value."

"There is no provision in the GSA documentation for any form of interim management. This is a significant omission and must be addressed. Without interim management, conservation values will rapidly decline. There is certainly no guarantee of their security" - Batesford, Fyansford, Stonehaven Landcare Group, 2023

"The levy needs to fund interim management. Interim management will require a funded position of its own, the cost of which must be included in the Levy calculations" - North West Alliance, 2025

"No interim management of this area before development occurs. According to people in Melbourne, in the time between prosed buying of grassland and development, the integrity of the grasslands Deteriorated due to suspicious and negligent actions. We need an interim management strategy to look after this area in the meantime" - submitter 10, 2023

"It is essential that an interim management strategy is established. It should have strong incentives and controls that will deliver good conservation outcomes for these designated grasslands and waterways to ensure their continued survival and value" - Batesford, Fyansford, Stonehaven Landcare Group 2023

"What is clear, however, is that without active management in the short term, the suitability of the Site for offsets (or conservation generally) will become redundant" - Landowner of 135 Staceys Road

"There is no provision in the GSA documentation for any form of interim management of TECs. Without detailed planning and targeted interim management, conservation values will rapidly decline. The lack of planning for the period between now and when land is eventually transferred to conservation management is a significant omission and must be addressed" - Geelong Field Naturalists Club, 2025

"The absence of any provision for interim management is a significant omission that must be addressed. Without interim management, conservation values will decline rapidly and there is no guarantee of their security. This is another important lesson from the Melbourne Strategic Assessment. Interim management also offers advantages in that actions on private land are less constrained, potentially enabling conservation outcomes that might not otherwise be achievable" - CoolGeelong, 2025

"Furthermore, conservation programs and activities should be implemented in the interim until the land is acquired to prevent further loss in environmental values." - National Trust, 2023

"It is disturbing that the draft Biodiversity Conservation Strategy admits that: "Since the time of the EHP site assessments, subsequent assessments have been undertaken by Biosis which have confirmed that the extent of Plains Grassland (EVC 132) has deteriorated significantly... without intensive active management the conversion of Plains Grassland to a dominance of Chilean Needle-grass is likely to be permanent." This means that it is imperative that for land to purchased for conservation needs to be identified and managed appropriately for their conservation focus as soon as possible." - Submitter 34, 2023

RESPONSE

The City is cognisant of the need for conservation values to be maintained in the period prior to the identified conservation areas being acquired and coming into public ownership. There are several options available to facilitate interim management including agreements with landowners, grants, leasing and landowner permission for the City to access land for maintenance/conservation purposes. The City intends to discuss these types of options further with future conservation area landowners after approval of the Strategic Assessment and associated confirmation of funding.

4.5.3 BOUNDARIES OF THE CONSERVATION AREAS

SUMMARY OF FEEDBACK

A number of stakeholders expressed concern over the provision in the Plan for minor boundary changes, and the potential risk of loss of biodiversity values through this process.

In addition, some landholders provided feedback that the process for minor boundary changes is a burden on proponents.

The text box below provides an excerpt of some of these comments:

"We are concerned that this provision could be exploited, as it is relatively easy to argue that a degraded area is unimportant compared to housing needs, even where that area could be restored or provides valuable buffering to conservation-significant populations" - CoolGeelong, 2025

"There is provision for "minor" boundary changes to occur, particularly when impacts to MNES will be minimal. Much stronger wording of this requirement is needed" - Geelong Field Naturalists Club, 2025

"Protection of the Conservation Areas must be carefully monitored to ensure that boundaries are retained and that there can be no net loss of habitat area if changes are to occur" - Geelong Field Naturalists Club, 2025

"While this process is ostensibly intended to ensure that any changes are justified and consistent with the objectives of the EPBC Plan, it is apparent that the EPBC Plan imposes a significant administrative burden on proponents, even for minor adjustments. The requirements for new ecological surveys, detailed reporting, and the involvement of multiple layers of review risk introducing unnecessary complexity and delay" - Bisinella, 2025

"There is provision for "minor" boundary changes to occur, particularly when impacts to MNES will be minimal. We would like to see stronger wording about this. It is very easy for a developer to successfully argue that a weedy patch is not important compared to housing, even if it can potentially be restored or provides good buffering to a population of conservation significance. We absolutely don't trust that good process will prevail here… We note that Conservation Areas never get expanded if areas of good biodiversity are found immediately adjacent. They only ever get cut" North West Alliance, 2025

RESPONSE

The Plan does provide a commitment for minor boundary changes (Commitment 2) as follows:

> *Proposed minor changes to the boundaries of land subject to development (as shown in Figure 4-1 of the Plan) will meet the eligibility for consideration and be in accordance with the process for considering changes set out in Section 4.5 of the Plan*

Creating a provision in the Plan for minor boundary changes is important to ensure the Plan has some flexibility through implementation. Importantly, the Plan includes a set of criteria to be met for boundary changes to be eligible for consideration. This includes the following criteria (see Section 4.5.1 of the Plan):

> *The boundary change does not modify the boundaries of the Northern Conservation Area, Eastern Conservation Area, or Cowies Creek Conservation Area unless it can be demonstrated that there will be no increase in risks on MNES and that there will be no net loss in extent and condition of habitat for MNES within the conservation areas*

In addition, the Plan also includes a set of commitments for the avoidance and protection of biodiversity within the conservation areas:

- Commitment 4 - *The Northern Conservation Area will be established in perpetuity to avoid and protect 50.5 ha of habitat for Striped Legless Lizard, 82 ha of habitat for Golden Sun Moth, and 81 ha of habitat potentially important for the recovery of Victorian Grassland Earless Dragon*
- Commitment 6 - *The Eastern Conservation Area will be established in perpetuity to avoid and protect 5.5 ha of habitat for Natural Temperate Grassland*
- Commitment 8 - *The gully avoidance area will avoid 3.5 ha of habitat for Striped Legless Lizard, 7 ha of habitat for Golden Sun Moth and 2.5 ha of Natural Temperate Grassland*
- Commitment 9 - *The Cowies Creek Conservation Area will be established in perpetuity to avoid and protect habitat needed to support the continued persistence of the Growling Grass Frog and potential habitat for Glossy Grass Skink in the WGGA*

Overall, the mechanism for minor boundary changes is considered suitable both for implementation, and protection of biodiversity.

4.5.4 FUNDING PROGRAM

There were a number of issues raised relevant to the funding program. These include:

- Land acquisition costs
- Components of the biodiversity levy
- Cost of the levy
- Changes to the levy

LAND ACQUISITION COSTS

Summary of feedback

Some landholders raised questions about the approaches used to estimate land acquisition costs. In particular, some stakeholders questioned:

- Whether properties have been values based on the Farming Zone or the Urban Growth Zone
- How biodiversity constraints have factored into land valuations
- The equity of valuation methods between different properties in the NGGA
- How the Chemring buffer has been factored into land valuation and zoning decisions

The text box below provides a summary of these comments:

> "[submitter] *has commissioned… a peer review of the valuations included in the draft Strategic Assessment Funding Program. This review considered the valuation methodology and concludes that the land rates adopted for lands to be acquired are low*" - Lovely Banks, 2025
>
> *"165, 195 and 225 Staceys Road are three or four times less per hectare compared to the values of 135 Staceys Road, 870 Ballan Road and 550 Elcho Road. Appendix 1 of the SAFP shows that the valuations were all done at different times, but there is no other information about how the cost per hectare was calculated. We request details of what assumptions have been applied and who has done the valuations of these six properties"* - Landowner of 225 and 195 Staceys Road, 2025
>
> *"With regard to the Gully Avoidance Area, it is not an equitable policy position to require this land to be gifted. The City has presented that avoidance of impacts to land within the gully avoidance area is required to minimize impacts to MNES and enable acceptable development within the NGGA….. Based on the broader benefit being gained by avoiding impacts in the gully avoidance area, the landowners of this land should be compensated through the Funding Program."*- Lovely Banks, 2025

Response

The City through its lawyers at Harwood Andrews commissioned Urbis Valuations to prepare land valuations for the proposed Northern and Eastern Conservation Area properties in the Northern Geelong Growth Area in late 2024 and early 2025. The valuations were informed by independent planning advice from a planning consultant. The Funding Program requires that land is re-valued on a regular basis to ensure levies collected match current values and costs. The

City will provide the peer review from Lovely Banks to the City's valuers for consideration when the next land valuations are commissioned.

With regards to the land valuations for 165, 195 and 225 Stacey Road being less than other properties this is likely due to the fact that the properties are in the Farming Zone and not identified for urban growth in the NWGGA Framework Plan. They are also within the 1,000m buffer of the Lara Energetic Material Manufacturing Plant (Chemring) which is a Major Hazard Facility and limits sensitive uses including residential. The valuations were undertaken by a highly credible valuation firm instructed by the City's solicitors. No alternative valuations have been provided by the submitter for comparison. A copy of the land valuations has been provided to submitters upon request.

Lovely Banks Development Group requests that the Gully Avoidance Area also be valued and included as a land acquisition item in the Funding Program. The City does not propose to add this as an item. The Gully Avoidance Area is located between a proposed waterway and (partially) the Eastern Conservation Area. It is steep land, problematic to service and is generally considered undevelopable under these circumstances. Encumbered land of this nature is typically transferred to the City through the subdivision process at no cost and that is what is proposed with the Gully Avoidance area.

COMPONENTS OF THE BIODIVERSITY LEVY

Summary of feedback

A number of stakeholders commented on the components of the biodiversity levy. This includes comments about the:

- Absence of funding for interim management
- Amount allocated for compliance
- Lack of funding for community engagement
- Amount allocated to the Moorabool River

The text box below provides an excerpt of some of these comments:

> *"…the absence of funding for interim management is a significant gap that should be rectified"* - CoolGeelong, 2025
>
> *"We also consider the allocation for compliance to be insufficient. The current proposal provides for only one Council officer position across the entire growth area, which is unlikely to be adequate given that a single VCAT matter can consume a substantial portion of an officer's time"* - CoolGeelong, 2025
>
> *"Interim management should be paid for by Levy."* - North West Alliance, 2023
>
> *"We are disappointed that the documentation includes no provisions for community engagement aimed at building long-term stakeholder investment and community oversight of conservation outcomes. We believe the levy should include an allocation for this purpose. For example, new homeowners in the growth area could receive information about local grasslands and their ecological significance"* - CoolGeelong, 2025
>
> *"Despite its ecological significance, the Moorabool River receives minimal attention in the Plan. It is ambiguously defined across documents, with limited funding committed to its restoration or long-term management. The allocation of only $150,000 for technical water studies1 is emblematic of this neglect"* - People for a Living Moorabool
>
> *"The levy needs to fund interim management. Interim management will require a funded position of its own, the cost of which must be included in the Levy calculations"* - North West Alliance, 2025

Response

As stated in an earlier response the City will investigate and discuss interim management options with future conservation area landowners after approval of the Strategic Assessment. The Funding Program includes funds for a 20 year maintenance period for conservation areas (in addition to 10 year management and establishment costs) and it would be appropriate for some of the maintenance funding to be used in early years for interim management to maintain values prior to acquisition.

In relation to the Moorabool River the City has added $150,000 to the Funding Program to fund investigations and preparation of a strategy or plan for the Moorabool river corridor and Avoidance areas. This is in addition to the existing $150,000 in the Funding Program for Moorabool River technical water studies.

COST OF THE LEVY

Summary of feedback

The cost of the levy was raised by a number of landholders. There is concern regarding the implications of the levy amount for development viability in the Growth Areas.

The text box below provides an excerpt of some of these comments:

> *"It is critical for Council to be mindful of the overall quantum of levies imposed on development to ensure that it is still economic for the land to be developed and that there is sufficient profit margin to provide the incentive for land to be developed"* - Bisinella, 2025
>
> *"Our view at this stage is that it is not economical to develop the land given the current quantum of levies across the board"* - Bisinella, 2025
>
> *"Currently, the Funding Program overestimates the total area which will likely be developed and, as a result, the total area against which a levy can be raised. For example, currently an NDA of 85% is used the levy per hectare is $81,090. However, If the Gross Area of the NGGA assigned the levy applies a more realistic NDA of 65% is used, the levy per hectare increases to $110,770.*
>
> *If this adjustment, or similar is not made in the short term, developers are exposed to unmitigated financial risk as the levy is not based on the actual likely development scenario. Without this, it is not possible to make informed comment or decisions. This issue was realized in the Melbourne Strategic Assessment where the NDA was overestimated and the levy collected insufficient to meet the commitments of the Victorian Government."* - Lovely Banks, 2025

Response

The City is aware of the quantum of the levies imposed on development. The expected biodiversity levy required to implement the EPBC Funding Program for the Western Growth Area is in the order of $44,000 per hectare. This cost is considered reasonable and is not considered likely to make development unviable. To provide context the draft Development Contributions Plan levy for the Creamery Road precinct is in the order of $800,000 per hectare making the biodiversity levy equivalent to 5% of the DCP levy. However, each land parcel has different economic circumstances and the City is not disputing that such levies may cause viability issues for particular developments depending on factors such as original land purchase cost, holding costs, available NDA and servicing/ land development costs.

The City has updated the Net Developable Area figures used in the Funding Program for precincts in both the Northern and Western Geelong Growth Areas. Estimates are now based on recently prepared Precinct Structure Plans (PSP) if available or NWGGA Framework Plan "Residential Area" figures minus 20 per cent to account for open space (10%), roads and other non-residential land uses and infrastructure and minus "Investigation Areas" in the Northern Growth Area. The updated NDA figures are shown in the tables below.

This updated NDA will inform the Biodiversity Levy outlined in the final *NWGGA Strategic Assessment Funding Program 2026.* The levies have increased as the total costs are divided by less NDA compared to the exhibited funding program, however as the submitter points out it is important that the proposed draft levy is as accurate as possible and NDA is not overestimated.

It should be noted that while the percentage share of the cost that each precinct is responsible for will not change (see Table 6 and Table 7) the exact NDA for each precinct will change and will be updated and "locked in" upon gazettal of each PSP.

Table 6: Northern Geelong Growth Area Precincts

Components	Elcho Road East	Elcho Road West / Heales Road West	Heales Road East	NGGA Total
Total land area (ha)	485	922	700	2107
Estimated Net Developable Area (ha)	284 (1)	572 (2)	287 (3)	1143
% of Growth Area NDA	25%	50%	25%	100%

Table 7: Western Geelong Growth Area Precincts (included in Strategic Assessment)

Components	Creamery Road	Batesford North	WGGA Total
Total land area (ha)	345	419	769[6]
Estimated Net Developable Area (ha)	197 [4]	264 [5]	461
% of Growth Area NDA	43%	57%	100%

Notes:

[1] Based on draft Elcho Road East PSP Place Based Plan Budget March 2026

[2] NWGGA Framework Plan combined ERW and HRW Residential Area minus 20% for open space, roads etc

NWGGA Framework Plan Residential Area 182 ha and Employment 177 ha minus 20% for open space, roads etc. (Note: [3] NWGGA Framework Plan Residential area of 384 ha includes 202 ha of "Future Residential Potential" land which has been excluded for this calculation)

[4] Based on Exhibited Creamery Road PSP November 2025 excluding 200 Ballan Rd (13 ha)

[5] NWGGA Framework Plan Residential Area of 331 ha minus approx. 20% for open space, roads etc (Note: NWGGA Framework Plan Residential area of 331 ha includes 65 ha of "Future Residential Potential" land)

[6] Note that this total includes 6 ha of land within the Ballan Road Reserve

CHANGES TO THE LEVY

Summary of feedback

Landholders provided comments on the implications of changes to the biodiversity levy.

The text box below provides an excerpt of some of these comments:

> *"Works in Kind and Funding Certainty: The Funding Program's itemised costs are high-level only. If the actual cost of delivering works (such as frog ponds) exceeds the available funds, it is unclear who will be responsible for the shortfall. The proposed levy sits outside current legislative frameworks for shared funding, and Council has provided little information on how such situations will be managed"* - Villawood, 2025

Response

The City has updated the Funding Program to split up, itemise and re-cost some of the large bundled up conservation works/contractor costs for the Western Growth Area. This resulted from additional workshops and discussions in early 2026 with the key landowner/developers along Cowies Creek - Villawood and Bisinella - regarding Cowies Creek Growling Grass Frog habitat management. As a result the City has updated its frog wetland costings (using Villawood commissioned costings) and developed separate Funding Program projects for each wetland to facilitate them being delivered as Works In Kind projects by the developers in the future.

OTHER COMMENTS ON THE FUNDING PROGRAM

There were a range of other comments on the Funding Program. These comments, and responses from the City, are provided in the table below.

Table 8: Specific comments on the Funding Program

Comment	Response
"The proposed process for the Registration of the Part 10 approval requires applicants to identify impacts to Matters of National Environmental Significance (MNES) upfront at registration. *The purpose of this requirement in the administration process is unclear as all impacts should have already been assessed in*	The reason that the Funding Program requires developers to identify any impacts to MNES as part of the EPBC Stream is to enable the City, as the approval holder, to monitor the impacts of specific development proposals on MNES and ensure that the City is achieving the objectives, outcomes, commitments and measures in the Plan. This is appropriate and reasonable, and the City

Comment	Response
the Strategic Assessment Report and the key information utilised to assess impacts is held by the City. *In addition, the impact of a particular action to MNES is not used to calculate the biodiversity levy, and many developers within the NWGGA would have no impact to MNES. As such, this request seems unnecessarily duplicative and does not result in a streamlined process for applicants which conflicts with Outcome 6 of the Plan. Depending on the level of information required, the impost of detailing this information could be significant.* *We understand that the City requires some information for the purposes of reporting and tracking development under the Plan, however, we recommend that it is the City who generates this information based on the development area submitted through planning permit applications rather than seeking it to be provided separately through an additional bespoke assessment process by applicants.* *It may be that the DCP, if that is the funding mechanism adopted, includes administrative process that require the applicant to identify its NDA and the DCP liability related to implementation of the EPBC Plan. But that is a simple and standard process that is best defined at the DPC stage. We cannot see a need for a developer to separately identify their impacts as they are defined already through the SIA and by cross referencing through to the EHP Report."* - Lovely Banks, 2023	does not propose to change this approach. However, the City will seek to incorporate additional explanatory text on the relationship between the Commonwealth approval and State planning processes.
"The mechanism to require developers to submit a developer implementation plan for approval by the City is unclear given that it occurs outside of the state planning framework and cannot be conditioned as part of the Part 10 approval. *While the conditions of approval could require that a developer implementation plan is prepared for an action using the Part 10 approval, the condition could not require approval of that document by the City.* *Lovely Banks submits that this requirement should be deleted from the documentation. It would be suitable to include a reference in the EPBC Plan to the general funding mechanism, for example through the DCP. Consultation should occur however, with the Planning Systems team in DTP to ensure the proposals from the City will be acceptable to the State. Our view is that the DCP is an acceptable and appropriate mechanism, but confirmation from the State should be sought."* - Lovely Banks, 2023	In terms of the mechanism to require developers to submit a developer implementation plan for approval by the City, the endorsed Plan establishes the legally binding mechanism to collect levies to fund the delivery and implementation of the commitments set out in the Plan. Section 146D(1) of the EPBC Act is a deeming provision which enables a person to undertake a controlled action "in accordance with" the endorsed plan. To clarify this the Funding Program (p.8) will be amended to include a statement to the following effect: "the provisions of the EPBC Act and the endorsed Plan provide the legal basis for the collection of the biodiversity levy and the implementation of the developer registration system in accordance with this Funding Program." The City disagrees with Lovely Banks' comments in various parts of its submission that it should consider the use of a DCP (via the DCPO) in relation to the collection of the biodiversity levy and the registration of a development under the EPBC Act Stream where no planning permit is required. This conflates the Funding Program under the EPBC Act framework with the use of a DCP under the State planning system. As noted above, the EPBC Act and the endorsed Plan provide the legal basis for the establishment of the Funding Framework including the 'EPBC Act Stream'.
"The registration process included in the funding program notes that the City will issue 'in-principle approval' for actions under the EPBC Act stream. The wording here should be	The City disagrees that it does not have the power to 'approve' a developer implementation plan – the endorsed Plan provides the basis for the establishment of

Comment	Response
updated to clarify that the City is not 'approving' a development, rather it is giving 'in-principle administration of the approval'. A process by which the City 'approves' a project or its approach including the use of mitigation measures is not provided for under the EPBC Act. *Lovely Banks submits that this wording is not necessary and can be deleted. Instead the City can ensure that any planning permit that it issues meets the requirements of the EPBC Plan."* - Lovely Banks, 2023	governance and administrative arrangements in relation to the funding framework, and as the approval holder, it is appropriate that the City is responsible for approving developer implementation plans to ensure that the City can monitor the impacts of specific development proposals on MNES. The Plan sets out the high level requirements in relation to the developer registration system, which must be complied with in order to 'undertake development within the Plan area and access the associated Part 10 EPBC approval' (see Section 4.4 of the Plan).
"The funding program states that 'Where no planning permit is required for development of land within the Levy Area, a development proponent is still required to seek approval for the development under the 'EPBC Act Stream'. *The documentation does not provide any indication as to what mechanism will be established or used to require a proponent to register their action where there is no requirement for a planning permit.* *Lovely Banks understands that the DCP system and the DCPO has these types of arrangements. It is recommended that the City have early discussions with DTP around proposed drafting of any DCP Overlay Controls."* - Lovely Banks, 2023	The City disagrees with Lovely Banks' comments in various parts of its submission that it should consider the use of a DCP (via the DCPO) in relation to the collection of the biodiversity levy and the registration of a development under the EPBC Act Stream where no planning permit is required. This conflates the Funding Program under the EPBC Act framework with the use of a DCP under the State planning system. As noted above, the EPBC Act and the endorsed Plan provide the legal basis for the establishment of the Funding Framework including the 'EPBC Act Stream'.
"Given that development under the Plan cannot occur until the levy is established, further information should be provided to stakeholders on the levy mechanism to provide assurance that the levy can be developed in a timely manner and will be able to be effectively implemented." - Lovely Banks, 2023	The City has an internal Strategic Assessment Implementation Working Group in place preparing for implementation post approval of the Plan. This includes levy collection. The Funding Program explains the levy collection mechanisms.
"There is scope for more explanation of how the funding process will operate and ensure that the desired outcomes under the Plan can be achieved (i.e., certainty that funding secured under the program will be sufficient to deliver the commitments over the life of the Plan). *A potential option could be to amend the early offset target so that it is set at five years from commencement of the first development, rather than five years from commencement of the Part 10 approval.* *Further information also needs to be provided on the existing funding profile available to support the implementation of the strategic assessment. This should include:* • *how much funding the City is providing upfront for the commencement of the fund,* • *what that funding is intended to cover, and* • *within what time frame the funding is intended to be expended."* - Lovely Banks, 2023	The City considers the Funding Program clearly describes the projects and associated costs required to fully implement the Plan over its 30 year life. It shows which commitments and measures each project responds to. Multiple meetings have been held with Lovely Banks and other growth area developers to discuss the makeup of the program and levy and many adjustments have been made to the projects to ensure it is adequate from implementation.
"The funding program does not include clear principles which would govern how the funding will be managed. The lack of principles reduces transparency and accountability. This increases the risks that funds will not be used efficiently or effectively and that significant levy increases will be required in future years of the Plan to fund core activities.	The City considers the Funding Program does clearly set out how the funding will be collected and managed. Section 4 of the Program ""Administration and Implementation: • Sets out how the Funding Program will be administered and implemented under the EPBC Act

Comment	Response
Principles should be developed and incorporated into the program which include: • *Proportion of levy fees which are utilised for administrative purposes (i.e., spending on staffing/fund administration to be capped at X%).* • *How funding will be prioritised to deliver commitments.* • *How the funding program will be reviewed to ensure that the actions being funded are meeting the outcomes of the Plan."* - Lovely Banks, 2023	alongside development permitted under the Victorian planning system; • Specifies when the Levy must be paid; • Describes when and how the City may accept the delivery of works, land or offsets by a development proponent, or request the provision of offsets by a development proponent, in lieu of cash payments towards the Levy liability; • Sets out how costs will be indexed over time; • Specifies when the Funding Program will be reviewed and adjusted as necessary over time; and • Describes how the Funding Program will be used by the City to monitor impacts to MNES over the life of the Plan, to ensure that offset delivery keeps pace with and occurs ahead of impacts within the Northern Growth Area (Commitment 18). In response to the proposed principles suggested in the Lovely Banks submission: • Proportion of levy fees which are utilised for administrative purposes (i.e., spending on staffing/fund administration to be capped at X%). Response: The Funding Program clearly breaks down and describes each project into the categories of Conservation Areas - Land, Conservation Areas - Management, External Offsets and Plan Preparation, Implementation & Governance. Administration costs such as staff are shared between the two growth areas and this is clearly shown in the Program. • How funding will be prioritised to deliver commitments. Response: The EPBC plan does include some early and time based commitments (such as acquisition of Stage 1 of the Northern Conservation Area in the first 5 years). As such the roll out and expenditure of funds will be guided by the priorities in the EPBC Plan. The Plan requires that offsets occur ahead of impact and this will also guide when the City acquires both on site offsets (conservation land) and external offsets. Several projects will be triggered by development of adjoining land and are likely to be delivered as Works-in-Kinds by developers. The City has undertaken modelling and projected forward the likely time based roll-out of the Funding Program projects over the 30 years period and likely levy income. This is a work in progress is not appropriate for inclusion in the Funding Program. Ongoing discussions with Lovely Banks as a key development partner are welcome on timing of development and responsibilities for delivery of projects. The City is securing capital and operating budget to enable early commencement of the program including some land acquisition in the first five years. • How the funding program will be reviewed to ensure that the actions being funded are meeting the outcomes of the Plan. The Funding Program

Comment	Response
	describes the review process in Section 4 including under the heading "Review Period".
"The funding program states that: 'The City as the approval holder for the Plan may require that a development proponent provide offsets in lieu of a cash payment towards all or part of the Levy liability, in circumstances where the City determines in its discretion that offsets are required to ensure that offset delivery is keeping pace with and occurring ahead of impacts within the NGGA.' *Lovely Banks supports direct provision of offsets to assist the City in implementing the EPBC Plan. Lovely Banks submits that the City develop a more detailed framework for how WIK for offsets can be implemented. We would welcome discussions with the City around this. A workshop format where a worked example or examples is explored would be helpful."* - Lovely Banks, 2023	The City welcomes support for direct provision of offsets and welcomes further discussion with Lovely Banks on this issue.
"The draft strategic assessment processes allow for works in kind to be provided (including offsets) in lieu of a biodiversity levy. Lovely Banks sees benefits in holding a workshop with the City to explore these process would help Lovely Banks to improve its understanding of the proposed approach." - Lovely Banks, 2023	The City supports workshopping the Funding Program "works-in-kind" provisions with Lovely Banks.
"The Plan identifies the NGGA Conservation Area to protect habitat for the Striped Legless Lizard and the Golden Sun Moth. *The documentation indicates that a portion of the site will be secured by year five for with the remaining area secured in year eleven. There is a risk with this approach that the value of the land will change between the current time and years five and eleven leading to increased costs which are then passed on to third parties.* *To address this issues, Lovely Banks submits that the City should consider the early acquisition of the land and including the finance cost in the funding mechanism and charging regime. This will ensure that the funding can be indexed early to reflect the final acquisition value which improves equity. Early acquisition would also support early delivery of the environmental benefits of the Plan and reduce risks that environmental values might degrade prior to public ownership being secured."* - Lovely Banks, 2023	The City is seeking to secure Council capital works budget to forward fund the early acquisition of the three Stage 1 properties in the Northern Conservation Area in the first 5 years of the program. However, it is not financially feasible for the City to acquire further land early on and this needs to be timed (i.e. 10 year +) to ensure sufficient levy is coming in to offset the City's expenditure. The program is designed for full cost recovery through the levy and land will be regularly revalued (as described in the Funding Program) to ensure the levy matches the cost of implementation.
"There is no publicly available information stating that an evidence-based buffer for Chemring was completed. The assumption therefore is that 135 Staceys Road is still very much within the 1,000 metre Chemring buffer. If this is incorrect, we request that the reduced Chemring buffer evidence be made available." - Landowner of 225 and 195 Staceys Road, 2025	The City advises that only the western portion of 135 Staceys Road is within the Chemring buffer not the full property. The 1,000m Lara Energetic Material Manufacturing Plant (Chemring) buffer is clearly mapped and discussed in the published Northern and Western Geelong Growth Area Framework Plan 2021.
"Rather than enabling developers to proceed with payment of offsets to address conservation actions, the City's approach introduces additional steps prior to permit assessment. We understand from the Funding Plan, that developers are required to undertake a de facto EPBC approval process through Council for each individual permit area, including the	The submitter Villawood was a key party to the Creamery Road PSP and DCP hearing where this issue was discussed. Drafting changes have been made in relation to the provisions of the Urban Growth Zone that relate to this matter to reduce complexity.

Comment	Response
preparation of detailed Developer Implementation Plans and the securing of Certificates of Acknowledgement of Consent before even lodging a permit application. *This not only increases the administrative complexity and risk of delay, but also places the burden of assessing cumulative impacts and delivering works in kind onto individual developers. The result is a process that is less predictable, more resource-intensive, and potentially exposes developers to risks that would otherwise be managed collectively under a departmental model. We are concerned that this divergence from the proven Melbourne approach undermines the core purpose of the strategic assessment—to enable timely, coordinated development while safeguarding environmental values."*- Villawood, 2025	The pre-planning permit steps are developer registration form; in-principle approval subject to conditions for consent; consent to in-principle approval and conditions; and issue of Certificate of Acknowledgement of Consent. These processes would utilise standard forms, and are necessary to ensure that developers agree to abide by the conditions of the Part 10 approval, including the payment of the levy. This enables the developers to rely on the Part 10 approval, which in turn allows a developer to proceed with a planning permit application under the 'Planning Stream'.
"The requirement for Developer Implementation Plans (DIPs) and Certificates of Acknowledgement of Consent prior to lodging a planning permit introduces substantial uncertainty and the risk of significant delays. Even after the PSA is gazetted, these pre-permit steps could materially delay the commencement of works and the delivery of homes. We believe that, if these processes are to be required, they should occur concurrently with permit assessment rather than as a prerequisite for lodging a permit. This concurrent approach would help minimise unnecessary delays and facilitate more efficient project delivery." - Villawood, 2025	The City prefers that these steps occur prior to a permit application, to ensure that any permit application is accompanied by formal confirmation that the developer consents to abide by the conditions of the Part 10 approval. In other words, the developer must demonstrate that it has obtained authorisation to rely on the approval (held by Council) under Part 10 of the EPBC Act
"Based on our reading of the implementation strategy of the Strategic Assessment, it appears that once a permit is granted and the Certificate of Acknowledgement of Consent is approved, the 'Developer Implementation Plan' will be created and submitted to Council as both the EPBC approval holder, and as the Responsible Authority for the permit. Presumably these two processes are coordinated, though there is no mention of this, nor of assessment timeframes within Section 4. *We would request Section 4 be clear within Figure 4 on Page 19, that the Developer Implementation Plan is one document approved by two arms of Council (the EPBC Stream and the planning officer) to ensure streamlined amendment processes if required. At the moment it sounds like one arm 'approves' and the other 'endorses' and that two separate documents come out at the end.* *As the Developer Implementation Plan contains information such as staging, development activity, and NDA, any change to these matters will necessitate amendment to the Developer Implementation Plan – presumably under both processes (the permit and the EPBC Stream). There is no mention of how to amend an approved Developer Implementation Plan – we presume it can be amended via Secondary Consent or S72 Amendment under the permit just as any endorsed document can, however it is not clear how an amendment under the EPBC Act Stream would work – ideally the version submitted for amendment under the permit would simply be referred to the EPBC Act Stream for their approval before being endorsed by the planning officer.* *Given the above and to assist with the overall process, we respectfully request further clarity on the contents and*	The City confirms that the Developer Implementation Plan is one document approved by two arms of Council (the EPBC Stream and the planning officer)

Comment	Response
approval process for the Development Implementation Plan including a template of its indicative contents and requirements." - Growland, 2025	
"Lovely Banks also recommends improved clarity on the steps regarding the Developer Implementation Plan. While it is assumed that the EPBC Act Stream and Planning Streams will be coordinated, there is no reference to this nor identified timeframes. Currently, it appears that one document is considered by two areas of the City to ensure streamlined amendment processes if required; with one arm 'approving' documentation and one arm 'endorsing' documentation with two separate documents delivered. Furthermore, as the Developer Implementation Plan contains information such as staging, development activity, and NDA, any change to these matters will necessitate amendment to the Developer Implementation Plan – presumably under both the EPBC and Permit processes." - Lovely Banks, 2025	The City confirms that the Developer Implementation Plan is one document approved by two arms of Council (the EPBC Stream and the Planning Stream). Timings and more detailed explanations of the processes will be developed as the City moves into the implementation phase.
"Lovely Banks recommends developing a simplified approach to a Development Contribution Plan design to strike a Biodiversity Levy based on the final PSP NDA. An allowance should be made in the funding model for the cost of finance for the early delivery of offsets whether that is funded by the City or by private land developers. The indexing model should ensure that all finance costs, no matter which party bears those costs, is recouped to restore equity between the parties." - Lovely Banks, 2025	Financing and compensation costs are included in the Funding Program (in addition to land values) where compulsory acquisition is proposed i.e. Stage 1 of the Northern Conservation Area which will involve acquisition of three Farming Zoned properties.
"The current NDA of 1407 ha underpinning the Funding Program assumes approximately 85 - 88% of the NGGA Gross Area. Based on our experience in greenfield growth areas across the state of Victoria, it is recommended that the levy is calculated on an NDA of between 60 – 70%, which is a more likely scenario. While we acknowledge that the PSP gazettal will determine the actual NDA and levy, accurate assumptions should be used to enable comment on the overall feasibility of implementation at this stage of the Strategic Assessment process. Lovely Bank's Gross Area calculation which forms the basis of the NDA % assumption in the Strategic Assessment Funding Program should be the area subject to the levy identified in Figure 3 of the Strategic Assessment Funding Program. From our high-level calculation is approximately 1586 ha. Currently, the Funding Program overestimates the total area which will likely be developed and, as a result, the total area against which a levy can be raised. For example, currently an NDA of 85% is used the levy per hectare is $81,090. However, If the Gross Area of the NGGA assigned the levy applies a more realistic NDA of 65% is used, the levy per hectare increases to $110,770. If this adjustment, or similar is not made in the short term, developers are exposed to unmitigated financial risk as the levy is not based on the actual likely development scenario. Without this, it is not possible to make informed comment or decisions. This issue was realized in the Melbourne Strategic Assessment where the NDA was overestimated and the levy collected insufficient to meet the commitments of the Victorian Government." - Lovely Banks, 2025	The City has updated the Net Developable Area (NDA) figures used in the Funding Program for precincts in both the Northern and Western Geelong Growth Areas. Estimates are now based on recently prepared Precinct Structure Plans (PSP) if available or NWGGA Framework Plan "Residential Area" figures minus 20% to account for open space (10%), roads and other non-residential land uses and infrastructure and minus "Investigation Areas" in the Northern Growth Area. This updated NDA will inform the Biodiversity Levy outlined in the updated Funding Program May 2026. The levies have increased as the total costs are divided by less NDA compared to the exhibited funding program, however as the submitter points out it is important that the proposed draft levy is as accurate as possible and NDA is not overestimated. The Northern Growth Area estimated levy is now in the order of $106,000 per ha of NDA. The Western Growth Area levy is in the order of $44,000 per hectare of NDA.

Comment	Response
"Either the Site needs to be removed altogether from the Northern Conservation Area, or it needs to be included in Stage 1 for acquisition in the short term (5 years). 6.9. Mr Yacoub reserves his position on the valuation assessment undertaken. Notwithstanding whatever figures are included in the materials, the reality is that, in the event that acquisition does not occur by agreement (including because the valuation price is not agreed), a Public Acquisition Overlay will be required to enable compulsory acquisition by the relevant authority." - Landowner of 135 Staceys Road, 2025	135 Staceys Road is part of the Stage 2 acquisition of the Northern Conservation Area and is not expected to be acquired or vested until the medium-long term (greater than 5 years).
"With regard to the Gully Avoidance Area, it is not an equitable policy position to require this land to be gifted. The City has presented that avoidance of impacts to land within the gully avoidance area is required to minimize impacts to MNES and enable acceptable development within the NGGA. If this is the case, the avoidance of land within this area benefits a number of landowners and facilitates broader development. In addition, the City has indicated that avoidance of impacts to Natural Temperate Grassland of the Victorian Volcanic Plain has significant value as it reduces the overall cost of offsets and as a result reduces the cost of the Funding Program. Based on the broader benefit being gained by avoiding impacts in the gully avoidance area, the landowners of this land should be compensated through the Funding Program." - Lovely Banks, 2025	Lovely Banks Development Group requests that the Gully Avoidance Area also be valued and included as a land acquisition item in the Funding Program. The City does not propose to add this as an item. The Gully Avoidance Area is located between a proposed waterway and (partially) the Eastern Conservation Area. It is steep land, problematic to service and is generally considered undevelopable under these circumstances. Encumbered land of this nature is typically transferred to the City through the subdivision process at no cost and that is what is proposed with the Gully Avoidance area.
"The Site's inclusion in the Northern Conservation Area as 'Stage 2' suggests it will not be acquired within the first 5 years of the Plan (as per Stage 1) and will only be acquired at the time of adjacent development and once sufficient levies to fund the acquisition have been collected.10 As the Council is unlikely to approve adjacent subdivision until such time as sufficient levies have been collected to fund acquisition of the Site, the acquisition of the Site is not expected to occur for many years in the 30-year life of the Plan. Reference is again made to the letter from Council to Mr Yacoub dated 17 March 2023 which suggests that acquisition will only occur towards the end of the 30-year life of the EPBC Plan.11 The Site will remain blighted until then. *If acquisition is not advanced (ie, within 5 years) then there is little to no point in acquiring the Site for conservation purposes at all."* - Landowner of 135 Staceys Road, 2025	135 Staceys Road is part of the Stage 2 acquisition of the Northern Conservation Area and is not expected to be acquired or vested until the medium-long term (greater than 5 years).
"In Bisinella Developments' view, it is appropriate that Council allow equivalent staging for the delivery of WIK contributions, in circumstances where this would not prejudice the achievement of the priorities outlined in the EPBC Plan. Further, this should be explicitly confirmed in the final version of the Funding Program. It may not be feasible for a developer to deliver the entirety of an agreed WIK contribution at the commencement of a staged subdivision. It is important that there is some level of flexibility in the timing for meeting the Levy liability, regardless of how this is to be achieved." - Bisinella, 2025	The City considers the staged delivery of WIK projects to be a reasonable request, provided that in the Funding Program it is expressed to be at Council's discretion. The Funding Program will be updated to more clearly specify, on page 21, that Council may choose to accept the delivery of works, land or offsets by a development proponent in lieu of cash payments at its absolute discretion.

4.5.5 OTHER COMMENTS ON PLAN IMPLEMENTATION

There were a number of other comments on the design of the EPBC Plan. These comments, and responses, are provided in Table 9 below.

Table 9: Specific comments on EPBC Plan implementation

Comment	Response
"Section 172 of the Planning and Environment Act 1987 allows the Minister for Planning and Responsible Authorities with special power to compulsorily acquire land. This power extends to any land that is: • *required for the purposes of a planning scheme.* • *vacant, unoccupied or used for any purpose not conforming with the planning scheme.* *If the land at 165, 195 & 225 Staceys Road is not within the UGZ and therefore not part of the Elcho Road West PSP, then how will the Planning Scheme authorise its future use? Council must get a planning scheme amendment gazetted to facilitate this public acquisition."*- Landowner of 225 and 195 Staceys Road, 2025	The Greater Geelong Planning Scheme at Clause 11.02-2L already provides policy support for acquisition of this land as a future conservation area. The land at 165, 195 & 225 Staceys Road is shown as "Agriculture - Future Investigation of Conservation" in the Northern and Western Geelong Growth Areas Framework Plan Map at Clause 11.02-2L. Clause 11.02-2L also includes an objective "To protect valuable environmental features and biodiversity assets" and a Strategy to "Ensure development retains and protects or, where that is not possible, offsets valuable biodiversity assets, including grassland areas". In addition to current planning scheme support the draft Planning Scheme Amendment C450ggee Creamery Road PSP which is expected to be approved by late 2026 also includes new policy at Clause 11.02-2L directly relating to the Strategic Assessment as follows: • Objective: "To deliver improved environmental and development outcomes through strategic consideration and assessment of the impacts of development and protection of matters of national environmental significance under the Environment Protection and Biodiversity Conservation Act 1999." • Strategy: "Ensure development is consistent with the Northern and Western Geelong Growth Areas EPBC Plan and supporting documents."
"Does the City of Greater Geelong intend to rezone the Farming Zone land to Public Conservation Zone or place a Public Acquisition Overlay on the land when it is outside the UGZ boundaries? The public acquisition may be for conservation purposes but at the heart of the decision, the public acquisition is for the benefit of land developers within the Elcho Road West PSP. This sort of Planning Scheme Amendment to land outside the UGZ will be heavily scrutinised by DTP and Planning Panels Victoria and is moving into unchartered waters. The cost of Councils legal team might be enormous. A much more transparent approach would be to include the land of 165, 195 and 225 Staceys Road inside the UGZ and have the PSP showing the land as conservation The public acquisition can then occur as it is required by the planning scheme." - Landowner of 225 and 195 Staceys Road, 2025	The City does propose to apply a Public Acquisition Overlay to the land. When the land is acquired and in public ownership by the City it will be rezoned to Public Conservation and Resources Zone and managed as a conservation reserve. Rezoning the land to Urban Growth Zone is an unnecessary interim step as the land is clearly proposed for conservation only and not for urban uses.

4.6 OTHER MISCELLANEOUS COMMENTS

There were a range of other miscellaneous comments on the draft documents. Table 10 provides some of these comments, and a response to the comments.

Table 10: Miscellaneous comments on the document package

Submitter	Comment/s	Response
Aboriginal Cultural Heritage		
National Trust, 2023	*"While it is noted in the EPBC Plan that there are locations within the Northern and Western Growth Areas that are of cultural significance to the Wadawurrung people (in particular near waterways), it has not been outlined how these areas will be protected.* *While the current documents state that works to heritage areas of post European settlement will be avoided, we would like to see the same level of care and protection afforded to areas of Aboriginal cultural heritage significance. We strongly encourage the prioritisation of* *further archaeological investigation and protection of culturally significant sites in partnership with the Wadawurrung Traditional Owners Aboriginal Corporation."*	The EPBC Plan notes that separate approvals may be required in accordance with State regulatory requirements before development under the Plan can proceed. This includes Aboriginal cultural heritage approvals under the Aboriginal Heritage Act 2006. Further work will be required as part of this process. In addition, Section 2.2.1 of the EPBC Plan notes that there has only been limited archaeological investigation within the Growth Areas and a large number of additional sites of significance for Aboriginal people potentially occur in these areas (The City of Greater Geelong, 2021). Under the Framework Plan, the City aims to recognise and protect these sites and work in partnership with the Wadawurrung people to interpret and manage these sites.
Additional approvals		
Barwon Water, 2023	*"It's is noted that significant water, sewerage and recycled water infrastructure will also be required within and around the remaining precincts of the Western Growth Area that have been excluded from the strategic assessment, namely the Batesford North, McCanns Lane and Merrawarp Road PSPs. In the longer term, the water, sewerage and recycled water networks within these future precincts will be interconnected with the infrastructure required within the other PSP areas included within this assessment. Exclusion of these areas from this plan and strategic assessment will likely mean further EPBC approvals will be required in order to facilitate Barwon Water infrastructure servicing of the GANWG beyond the two initial PSPs (Creamery Road and Elcho Road East PSPs)"*	It is understood that infrastructure will be required to service the Batesford South, McCanns Lane, and Merrawarp Road precincts. These precincts were excluded from the strategic assessment, and the BCS, for the 2025 re-exhibition versions. This is because there was a lack of information on a number of factors including anticipated development demand and timing, detailed plans for decommission and rehabilitation of the active Batesford Quarry, and ecological survey data. The EPBC Plan provides for external infrastructure development outside of the Growth Areas within the Strategic Assessment Area (limited to the supporting infrastructure and services class of actions and the environmental management class of actions). It is therefore noted that development outside of the Growth Areas (aside from the aforementioned classes of actions), and the Strategic Assessment Area, will require separate approval under the EPBC Act.
Additional species to consider		
North West Alliance, 2023	*"This species on the DCCEEW Finalised priority assessment lists of potentially threatened species due to be determined April 2024.* *The 2021 EHP Existing Ecological Conditions: Northern and Western Geelong Growth Areas fails to even mention this species. This species has different*	The categorisation write up for Glossy Grass Skink has been updated to refer to the Atlas of Living Australia records. Glossy Grass Skink is now assigned to 'Category 1' and is assessed in detail in the SAR.

Submitter	Comment/s	Response
	habitat preferences to Delma impar and so is unlikely to have been incidentally picked-up through tile grid surveys. Glossy Grass Skinks have been recorded within a few kilometres of the Northern Geelong Growth Area. They should be surveyed for. *Strangely, Table A-2: Categorisation of FPAL species states that there are no records for this species within the study area. However, the Atlas of Living Australia shows that there are."*	
Additional surveys / information		
Barwon Water, 2025	*To facilitate the delivery of initial servicing infrastructure at the Creamery Road Precinct, Barwon Water is currently undertaking Golden Sun Moth surveying due to gaps in the available data. We would be happy to share the outcomes of this surveying work.*	The results of these surveys were considered for updating the SAR. Given that Golden Sun Moth was not recorded in Creamery Road as part of the additional surveys, no change to the SAR is required.
Barwon Water, 2025	*During the detailed design and investigations stage of the Creamery Road Sewer Hub and rising main, it has been identified that the biodiversity mapping of the Creamery Road precinct (Figure 3-4, Draft Biodiversity Conservation Strategy) is out of date. Specifically, land mapped as 0132 Plains Grassland at 60 Avonlea Road, Bell Post Hill, where the required Creamery Road Sewer Hub is to be located has no current evidence of grasslands being present. It is requested that the mapping included within this documentation is updated to include current values at the sites.*	The ecological survey dataset used in the strategic assessment has been timestamped. This approach and the dataset was agreed with DCCEEW and DEECA in the initial stages of the strategic assessment. It is noted that NVPPs will be prepared as part of each PSP process, which will identify native vegetation to be retained and removed across each precinct, and offset requirements.
Growland, 2023	*"We acknowledge that the exact offset obligations for Growland's landholdings in the NGGA have yet to be confirmed by Council as per its correspondence to Growland dated 03 February 2022. This correspondence confirmed that Council had not yet accepted Growland's assertion that the Golden Sun Moth (GSM) habitat should be reduced at 675 Evans Road and 775 Evans Road. However, Council also advised that a review process was being undertaken by Biosis and a Technical Reference Group to confirm the accuracy of the conclusions drawn from the data presented within the original Ecology and Heritage Partners Flora and Fauna investigations. It remains Growland's position that the habitat and offset area should be reduced, and we await confirmation of this following the review flagged by Council."*	The outcomes of this review process are provided on the City's website here.

Submitter	Comment/s	Response
Age / quality of the data		
Landowner of 135 Staceys Road, 2025	*"Because no updated surveys for the GSM or SLL have been undertaken, the surveys undertaken by Ecology & Heritage Partners between November 2019 and December 2020 are the latest information available about the Site's conditions. These are now more than 5 years old. Paragraph 23 of the Original Submission remains relevant. No regulator would support the use of such outdated data by a developer or private entity, and no double standard should apply to this process"*	The ecological survey dataset used in the strategic assessment has been timestamped. This approach and the dataset was agreed with DCCEEW in the initial stages of the strategic assessment. It is noted that strategic assessments typically occur over a longer duration than site-by-site approvals and therefore often rely on datasets collected over a longer timeframe. DCCEEW are supportive of the data approach.
Landowner of 135 Staceys Road, 2025	*"It is also noted, as would be expected in accordance with standard practice for Victoria, that site assessments for grassland that are more than 3 years old would not be supported as background assessments to support PSPs. The debate will therefore need to again be had at the PSP stage, based on updated surveys, if not resolved now"*	The ecological survey dataset used in the strategic assessment has been timestamped. This approach and the dataset was agreed with DCCEEW and DEECA in the initial stages of the strategic assessment. It is noted that strategic assessments typically occur over a longer duration than site-by-site approvals and therefore often rely on datasets collected over a longer timeframe. DCCEEW and DEECA are supportive of the data approach. It is also noted that NVPPs will be prepared as part of each PSP process, which will identify native vegetation to be retained and removed across each precinct, and offset requirements. This process includes additional surveys in areas where EHP have not had access.
Bisinella, 2025	*"The TactEcol Review notes that the mapped area of Grassland was highly degraded when assessed in 2019–2020, consisting of only one native species (Austrostipa spp.). Given its condition and the age of the data, TactEcol recommends that this patch be resurveyed to determine whether it still exists and qualifies as Plains Grassland under current policy, given there is no evidence that further surveys of this vegetation have been completed"*	The ecological survey dataset used in the strategic assessment has been timestamped. This approach and the dataset was agreed with DCCEEW in the initial stages of the strategic assessment. It is noted that strategic assessments typically occur over a longer duration than site-by-site approvals and therefore often rely on datasets collected over a longer timeframe. DCCEEW are supportive of the data approach.
Villawood, 2023	*"Our client submits that the Strategic Assessment should not be progressed until all the ecological surveys that underpin the Strategic Assessment and the approached outlined in the draft Plan have been scrutinised by an independent peer reviewer. It is inconceivable that a policy of such importance as the Strategic Assessment and draft EPBC Act Plan can proceed where there is such uncertainty about the robustness and completeness of the environmental surveys that underpin them."*	The approach to the data was agreed with DCCEEW in the initial stages of the Strategic Assessment, and DCCEEW are supportive of the data approach. It is also noted that in January 2022, the City provided an opportunity for landholders that had their properties surveyed during the period of the EHP surveys to provide additional information for consideration in the Strategic Assessment. The additional information was reviewed against a set of criteria to help inform and guide decisions on appropriate changes to the dataset. Refer to Section 13.2.3 of Part 3 of the SAR for further details.

Submitter	Comment/s	Response
Classes of Actions		
Barwon Water, 2023	*"Barwon Water note that s4.3.6 rules out "all activities included within the 'energy category" except for "solar energy facility. Furthermore, s4.3.2 states that industrial development class of actions can only occur within the land subject to development, which table 4-3 identifies "solar farm facility" under Energy Generation.* *Barwon Water note that the installation of a new Advanced Water Recycling Facility will present the opportunity to co-locate renewable energy generation e.g. biogas opportunities for generating renewable energy off organic waste treatment and disposal, and/or hydrogen production at this site. Accordingly we request these development types and activities criteria be expanded to permit the installation of an "energy generation facility" and relevant industrial activities required to permit a hydrogen production facility at the Advanced Water Recycling Facility site. It is noted that this would occur within the Study Area and likely within the Strategic Assessment Area, but not within the identified Growth Areas"*	The classes of actions have been updated to include Energy generation such as 'solar farm facility' and 'Waste-to-energy facility'. The 'development not covered by the plan' has been updated so that Energy generation is not excluded. However, 'Wind energy facility' and 'earth and energy resources industry' remain on the exclusions list as these actions would involve impacts greater than the impacts that have been assessed in the Strategic Assessment Report. These updates will allow Barwon Water to co-locate renewable energy generation including biogas etc. where required (with the exception of wind energy and any earth and energy resources such as geothermal energy).
Barwon Water, 2023	*"Barwon Water request that "Reservoir" is removed from the specific impact activities that are excluded from the Plan, and note that constructed water basins and storages that could be considered reservoirs could be a servicing requirement for the GANWG within the Study Area and Strategic Assessment Area, including at the potential water storage locations and the new Advanced Water Recycling Facility"*	Constructed water basins and storages are covered by the supporting infrastructure and services class of actions. This class of actions includes 'utility installation' as a development type. Examples of this development type include: • To collect, treat, transmit, store or distribute water • To collect, treat, or dispose of storm or flood water, sewage, or sullage Reservoir is defined in the Victorian Planning Provisions as "*A natural or artificial lake used as a source of water supply that is owned or managed by a public authority*." Potential impacts associated with this type of development have not been assessed as part of the strategic assessment, and therefore "Reservoir" is excluded as an impact type from the Plan. A note has been made in Section 4.3.6 to clarify this.

Submitter	Comment/s	Response
Community engagement		
CoolGeelong, 2025	*"We are disappointed that the documentation includes no provisions for community engagement aimed at building long-term stakeholder investment and community oversight of conservation outcomes"*	The Plan includes a commitment (23) to develop a Stakeholder Engagement Strategy. The Stakeholder Engagement Strategy will identify: • Engagement objectives and principles • Key stakeholders and their interests in the Plan • Engagement processes and tools, including an implementation schedule • How the results of engagement will be used to inform improvements to implementation of the Plan, including through the 5-yearly independent evaluation and assurance reviews (see Section 7.5) • Reporting requirements on results of engagement to be included in annual progress reports A key stakeholder which will be included in the Stakeholder Engagement Strategy is environment / community groups. Preparation of the Stakeholder Engagement Strategy is included as a costed item in the funding program, and will be funded through the levy.
Villawood, 2025	*"The creek corridor offers a strong opportunity for culturally appropriate Integrated Water Management and Natural Resource Management. The holistic involvement of the WTOAC Gobata Dja (Healthy Country) team is essential. Their presence, Cultural knowledge and guidance on water, protection, and the growth of species such as the Growling Grass Frog, along with the many plants and grasses that sustain life, resources and habitat, will ensure decisions honour Country"*	The updated Conservation Management Plan for Cowies Creek will provide opportunities for cultural management and land use in the creek corridor.
Villawood, 2025	*"Next Steps* • *Book a consult on Country with WTOAC Gobata dja team consisting of Water and NRM engagement for feedback and recommendations and opportunities to collaborate.* • *Language opportunities* • *Align with the Palert Tjarra Dja Healthy Country Plan and WTOAC's "Water is Life" statement* • *Prepare a narrative of the cultural significance of the waterway and surrounds, as lightly touched on in this document*	As above, the updated Conservation Management Plan for Cowies Creek will provide opportunities for cultural management and land use in the creek corridor.

Submitter	Comment/s	Response
	• *Agree on the location of the single Growling Grass frog pond in the north-west corner through a meeting.* • *Identify opportunities to ensuring ongoing access to the Cowies Creek for cultural purposes, now and into the future* • *More work to ensure access to the Cowies Creek by the greater community is planned for as the connection to and responsibility for nurturing Council must be shared."*	
North West Alliance, 2025	*"We are disappointed that the plans contain no focus on community engagement for the purposes of building long-term stakeholder buy in and community oversight. There should be an allocation in the Levy for this. New homeowners should receive materials on their local grasslands etc. Including some wording around this would go some way to ensuring this is a good forward-looking package"*	As above, the Plan includes a commitment (23) to develop a Stakeholder Engagement Strategy. The Stakeholder Engagement Strategy will identify: • Engagement objectives and principles • Key stakeholders and their interests in the Plan • Engagement processes and tools, including an implementation schedule • How the results of engagement will be used to inform improvements to implementation of the Plan, including through the 5-yearly independent evaluation and assurance reviews (see Section 7.5) • Reporting requirements on results of engagement to be included in annual progress reports A key stakeholder which will be included in the Stakeholder Engagement Strategy is environment / community groups. Preparation of the Stakeholder Engagement Strategy is included as a costed item in the funding program, and will be funded through the levy.
Barwon Water, 2023	*"Barwon Water should be listed as a "key stakeholder" in the Stakeholder Engagement Strategy as we have a key interest in the Plan. Our main interest being as a key infrastructure provider for the GANWG."*	This section of the Plan has been revised to include Barwon Water as a key stakeholder.
Friends of Cowies Creek, 2023	*"FoCC regularly hosts school groups that participate in regenerative activities along Cowies Creek. Students in years 10,11 and 12 from Northern Bay College contribute by weeding, planting and cleaning up the creek during school terms, Cowies Creek provides students with a connection to nature and FoCC members facilitate actions and conversations that emphasise the biodiversity values of healthy waterways in urban environments. The ongoing protection of Cowies Creek will continue to have broad reaching benefits for young people by providing a space that consolidates the importance of maintaining a healthy ecosystem into the future. FoCC believes it is essential that decision-making*	The strategic assessment documentation has been published for public exhibition twice, providing the community with opportunities to comment on the strategic assessment. In addition, there has been direct consultation with community and environmental groups throughout the life of the project, most notably during the structured decision-making process in 2024. The City agrees that engagement with stakeholders, including young people, is important. Regarding implementation of the EPBC Plan, there is a commitment to develop a stakeholder engagement strategy to guide the City in undertaking ongoing

Submitter	Comment/s	Response
	methods regarding protection of our diverse natural environments such as Cowies Creek, includes engagement and consultation with the young people that will ultimately be affected by adverse environmental outcomes. An adequate youth consultation and engagement process must be implemented as part of the Geelong Strategic Assessment."	engagement with key stakeholders over the life of the Plan. Key stakeholders identified in the EPBC Plan include environmental and community interest groups.
Compliance		
North West Alliance, 2023	*"The current proposal fails to put forward DCCEEW compliance actions if the City of Greater Geelong fails to deliver on its promises. These need to be clearly articulated for us to have confidence in the proper governance of the Geelong Strategic Assessment. DCCEEW needs a strong and nuanced oversight role"*	The EPBC Plan also provides a compliance framework (see Section 7.6 of the EPBC Plan), which aims to: • Support the Commonwealth who have responsibility for compliance under the EPBC Act • Ensure the City delivers the commitments and achieves the outcomes of the Plan • Support regulated third-parties (developers) to undertake approved actions under the endorsed Plan in accordance with the Commonwealth approval conditions The EPBC Plan also provides for a Monitoring, Evaluation, Reporting and Improvement (MERI) framework. The monitoring component of this framework required a range of data to be collected on compliance (i.e. Number of non-compliances with permit conditions relevant to Commonwealth approval conditions). The Evaluation component will provide for five-yearly evaluation and assurance review, which will analyse compliance with the Commonwealth conditions of approval. Any specific compliance issues during implementation will be a matter for DCCEEW to manage.
People for a Living Moorabool, 2025	*"A major question is how the avoidance areas will be implemented on the ground and what legal weight they will carry over time. We note with concern that the current draft lacked clear compliance mechanisms to ensure the City of Greater Geelong adheres to the promised avoidance measures. Simply put, without binding controls, there is a risk that the "avoidance" could be eroded or ignored as development pressures mount"*	The Plan does not provide development approval within the conservation areas for urban and commercial development, industrial development, or rural development. It is noted that the EPBC Plan provides for the following classes of actions within the strategic conservation areas: • Environmental management (within all strategic conservation areas) • Limited activities under the supporting infrastructure and services class of actions (note this class of actions only applies to the 'Cowies Creek Conservation Area', 'Moorabool River corridor' and 'Moorabool avoidance area' within the avoided land in the WGGA, and the gully avoidance area within the avoided land in the NGGA) Refer to Section 4.2 and 4.3 of the EPBC Plan for further details.

Submitter	Comment/s	Response
		In regard to compliance, the EPBC Plan also provides a compliance framework (see Section 7.6 of the EPBC Plan), which aims to: • Support the Commonwealth who have responsibility for compliance under the EPBC Act • Ensure the City delivers the commitments and achieves the outcomes of the Plan • Support regulated third-parties (developers) to undertake approved actions under the endorsed Plan in accordance with the Commonwealth approval conditions The EPBC Plan also provides for a Monitoring, Evaluation, Reporting and Improvement (MERI) framework. The monitoring component of this framework required a range of data to be collected on compliance (i.e. Number of non-compliances with permit conditions relevant to Commonwealth approval conditions). The Evaluation component will provide for five-yearly evaluation and assurance review, which will analyse compliance with the Commonwealth conditions of approval.
Conservation buffer zone		
Submitter 11, 2023	*"These areas need a conservation buffer zone of a minimum of 100 m around them to minimise future impacts of adjacent land use and to allow for passive recreation and engagement opportunities adjacent to areas of conservation significance"*	The Plan includes a commitment (14) to establish a conservation interface for the conservation areas to minimise the indirect impacts of development. This approach is considered adequate.
Council operation		
Villawood, 2025	*"Process Uncertainty: There is little clarity on who within Council will assess and approve DIPs and consents, what level of detail will be required, and how the assessment process will operate. The risk of inconsistent or protracted decision-making is high, especially when multiple parties are seeking permits concurrently and cumulative impacts must be considered."*	Requirements for Developer Implementation Plans for landholders in the WGGA have been revised with further clarity. It is noted that a strategic implementation team has been established, and the City is confident that this team can appropriately manage the implementation of the EPBC Plan alongside the state planning process.
Minor revisions		
People for a Living Moorabool, 2025	*"Indeed Figure 3-8: Hydrological values of the WGGA on page 25 of the Draft BCS shows the floodplains as blue areas titled 'Floodplains, wetlands and retarding basins'. This ambiguity needs to be removed and represents a serious gap in the protection strategy. Without clear exclusion provisions, there is a tangible risk that the designated buffers for conservation and avoidance areas may be eroded in practice, occupied by engineered basins or treatment wetlands that degrade the natural functions and visual amenity of the river landscape"*	This map has been revised. The legend no longer refers to these areas as 'retarding basins'.

Submitter	Comment/s	Response
Barwon Water, 2023	*"Figure 3-3 (below) has a hatched blue area labelled "DELWP wetland", with further references in section 3.2.7 to a "DEECA modelled wetland formation" at a "wastewater treatment plant adjacent to Anakie Road". This is in fact the Lovely Banks Basin site, a Barwon Water owned drinking water storage for the Geelong and District Water Supply System"*	This figure in the BCS has been updated to clarify in the legend that it is a "DEECA modelled wetland". Section 3.2.7: Wetlands in the BCS, and Attachment A to Part 4 have been revised to accurately describe this area.
Barwon Water, 2023	*"Barwon Water note our 2022 Urban Water Strategy: Water for our Future which sets out the transition being made to shift to reduce our region's reliance on traditional water sources, such as rivers and groundwater, to more climate resilient sources like recycled water and desalinated water. Furthermore, as part of our broader works program, Barwon Water is committed to exploring opportunities to return water to the environment and Traditional Owners"*	Noted.
Corangamite Catchment Management Authority, 2023	*"Within the Plan the text and Figure 7.3 are in slight conflict and text should be updated in-line with the figure in the Plan. For example the evaluations are referred to as 5 yearly and end of yet the diagram reflects an annual evaluation and adaptive management process. This more frequent process of review and adaptation is critical and draws on the identified compliance and implementation data collected annually. It also addresses the efficiency issue in Table 7.7 and some adaptive management categories and circumstances in Fig 7.8."*	This section of the Plan and the associated figure has been revised for the final version.
Corangamite Catchment Management Authority, 2023	[specific comments on] *Part 4 – Impact Assessment:* • *Table 17-3 (p17-13) It would be good to see a TAP for altered water flows and quality? Is there no KTP for this under the EPBC Act?* • *Table 22-2 (p22-5) Under Key Points for Hydrology - Should include the managed environmental water regimes for Reedy Lake and Hospital Swamps within the Lake* • Connewarre complex. These are delivered via the Barwon River Environmental Entitlement 2011, and managed by CCMA on behalf of Victorian Environmental Water Holder (VEWH). • *Table 22-2 (22-8) The incorrect name Wathaurong is used here and possibly elsewhere in the document. It is Wadawurrung.* • *22.7.2 (p 22-17). Suggest also referencing licenced eel fisheries within and adjacent to Lake Connewarre complex.*	Responses to these points are provided below: • Agree. However, altered water flows and quality is not currently a listed KTP under the EPBC Act, and there is therefore no TAP • This table has been adapted from the formal ecological character description of the Ramsar Site. See Section 4.4: Critical components and processes of the ecological character description • This has been revised • Eel fisheries have not been included in this section, as this indirect impact is related to increased public access to Ramsar sites due to the EPBC Plan. Existing fishery operations are not relevant to this

Submitter	Comment/s	Response
Corangamite Catchment Management Authority, 2023	[specific comments on] *Part 1 - Overview* • *3.3.10 - (p3-10) Suggest description of Lake Connewarre include businesses uses, viz. Licensed eel fisheries.* • *3.4.3 - (p3-15) Suggest including disturbance caused by recreational duck hunting at Reedy Lake and associated wetlands in relation to birds.*	These revisions have been made.
Corangamite Catchment Management Authority, 2023	*"With regards to section titled 'Decision-making', recommend the regions floristic management unit mapping and associated NRM data on the region's NRM Portal be referred to. A reference that decision-making will incorporate climate change should be included. Please refer to the Corangamite NRM Plan for Climate Change for specific impacts of climate change and recommended actions for this area."*	The decision-making guidance principle requires that decision making ""use the best available ecological information to make decisions. This includes information from detailed ecological surveys, historical species records, native vegetation and species habitat modelling, and expert advice"". This list is not exhaustive, and captures the NRM portal and associated data. Landscape scale threats (including climate change) have been included as a consideration for decision making.
Mitigating indirect impacts		
Geelong Field Naturalists Club, 2023	*"Mitigation of indirect threats (Sect 5.1.1 of the EPBC Plan) is especially important in the Conservation Areas. Fencing high quality areas to prevent recreational access or access by domestic animals will be necessary to stop undue disturbance of habitats and the species in them.* *Within the Conservation areas, creating burn regimes that enhance the ecological outcomes, remove high fuel loads and maintain the best habitat structure will require specialist knowledge and trained personnel.* *Managing storm water and the water quality of runoff into the catchments of Cowie's Creek and the Moorabool will require careful planning but this should be standard procedure for all new developments."*	The Plan includes a commitment to develop Conservation Management Plans for the Northern Conservation Area, the Eastern Conservation Area, and Cowies Creek Conservation Area. The CMP will include management actions and arrangements within these areas. The Plan also includes a commitment to implement additional specific mitigation measures to minimise indirect impacts on the Northern Conservation Area, the Eastern Conservation Area, and Cowies Creek Conservation Area. This includes establishing a conservation interface, requirements for the design of public lighting, and the preparation of Construction Environmental Management Plans for construction works on land immediately adjacent to the conservation areas. In regard to the Moorabool River corridor, the Plan includes an additional specific mitigation measure to minimise indirect impacts on riparian waterways, including Hovells Creek and the Moorabool River. These commitments under the Plan are expected to address indirect impacts on the Conservation Areas.
Offsets		
DEECA, 2025	*"DEECA acknowledges CoGG's commitment (Commitment 17) to pause development if offset acquisition does not stay ahead of impacts following a 12-month search period. However, as this commitment sits outside the EPBC Plan*	No changes have been made in response to this comment, as the associated measures will deliver the commitment in accordance with the outcomes framework.

Submitter	Comment/s	Response
	and can be amended, DEECA recommends embedding this pause requirement as a formal commitment within the EPBC Plan itself"	It is also open to DCCEEW to include approval conditions relating to the timing of offset delivery, if considered appropriate.
Geelong Field Naturals Club, 2025	*"The GFNC is hesitant to support any offsetting of key habitat zones. This invariably leads to an overall reduction in habitat within the region"*	Noted. This project has appropriately implemented the mitigation hierarchy, with an initial focus on avoidance through the two Structured Decision Making processes which have been applied.
North West Alliance, 2025	*"We wish to again note for the record that we are still very uncomfortable with the extent of offsetting. We reluctantly accept that the time has passed for those arguments in this case"*	Noted. This project has appropriately implemented the mitigation hierarchy, with an initial focus on avoidance through the two Structured Decision Making processes which have been applied.

Submitter 14, 2023	*"The current proposal is that all offsets should be 10 ha or greater in size. This should be re-considered. Many of the best grassland remnants that still survive are much smaller, and it is very important that these become protected, not overlooked because of an arbitrary size limit"*	It is acknowledged that small remnant patches provide conservation value for this TEC. This reflects the critically endangered status of the community and rate of decline in extent, patch size and condition across its distribution.
		However, one of the key benefits of a strategic assessment is the opportunity to design and implement an offset package that achieves better conservation outcomes than can be achieved through site-by-site assessments. The EPBC Act Guide to Undertaking Strategic Assessments (DSEWPC, 2011) states that the advantages of strategic assessments include the:
		• *"Capacity to achieve better environmental outcomes and address cumulative impacts at the landscape level*
		• *Coordinated establishment and management of offsets"*
		The EPBC Plan (and the BCS) provides an approach to strategic offsets which aims to maximise the benefits to MNES. This includes:
		• Focusing offsets on large patches of native vegetation and habitat that are well located in the landscape from a biodiversity perspective, including sites that:
		  o Occur within key biodiversity corridors and improve connectivity across the landscape
		  o Are connected to existing conservation reserves
		This approach is considered appropriate given the strategic nature of this project.

Submitter 14, 2023	*"With the state offsets, COGG is proposing to let the developers choose where the offsets are. That means a piecemeal approach which will not build up a network of conservation properties. The Plan should require COGG to strategically purchase the state offsets with funding from the developers. These*	The design of the Plan and the BCS included careful consideration of the merits of aligning State and Commonwealth offset requirements. The de-coupling of State and Commonwealth offsets is considered appropriate from economic, implementation, and ecological perspectives.

Submitter	Comment/s	Response
	offsets should be in a conservation corridor or next to a conservation area, preferably within 25km of the Growth Areas"	State offsets are required to be secured within the same LGA or CMA region as the impact area, which for the Growth Areas includes the Greater Geelong LGA or the Corangamite CMA. However, offset sites that support the MNES impacted within the Growth Areas are extremely limited or unavailable within these regions. Allowing Commonwealth offsets to be delivered across a broader geographic area provides opportunities to secure more strategic, larger, and better-connected offset sites. Importantly, the de-coupling of State and Commonwealth offsets is expected to result in an improved conservation outcome, as it enables the protection of a greater extent and diversity of values. Overall, the offset approaches for both State and Commonwealth matters are considered to adequately compensate for the impacts of development.
Corangamite Catchment Management Authority, 2023	*"There is only 1% of VVP grassland habitat left – how will suitable offsets be found with such limited areas?"*	One of the key benefits of the final layout decided through the Structured Decision Making process (see Supporting Document C to the SAR), was the reduction in risk around offset availability. The avoidance and offsetting of Natural Temperate Grassland in the Eastern Conservation Area notably reduces the offset liability for the strategic assessment. In addition, Section 4.2.3 provides context on offset availability. This involved analysis to provide confidence in the current and future supply of offsets. In summary, the analysis suggests that there is sufficient availability. Particularly because: • There were a number of suitable sites on the market at time of preparing the Plan • The long life of the Plan allows for other offset sites to come onto the market • Delivery of a proportion of the offsets within the Growth Areas addresses part of the offset liability However, the analysis also emphasised that securing offsets early will be important and coordination by the City to find offsets will be critical.
SIG Group, 2025	*"There are other matters which require additional clarification which would afford all landowners and stakeholders further insight and confidence to support the Referral to proceed, these include… Explicit confirmation that the Western Growth Area does not require the securing of offsets in accordance with the EPBC approval"*	Development under the plan will result in residual adverse impacts to MNES in the NGGA only. See Section 5.6 of the EPBC Plan.
Growland, 2025	*"To avoid uncertainty, the EPBC Plan should explicitly acknowledge that the Council will secure all offsets, unless a landowner chooses to apply their own existing secured offsets, the final version of the EPBC Plan should avoid*	The Plan clearly states in Section 5.6.5: "*The City will coordinate offset delivery on behalf of developers, which will help ensure that the offsets are delivered successfully and in a strategic manner. This will be funded under the Plan's funding framework.*"

Submitter	Comment/s	Response
	duplicating offset obligations on individual landowners, particularly those who have already met expected obligations"	Section 5.6.5, under the heading 'Securing offset sites', has been revised to clarify the role of works in kind, land in kind, and offsets from development proponents in delivering the offset requirements.
CoolGeelong, 2025	*"We note for the record that we remain concerned about the extent of offsetting proposed under this strategic assessment. While we accept that the opportunity to revisit those broader arguments has passed, it is important to acknowledge the scale of residual impacts across the growth area… These are considerable losses for biodiversity, and we would encourage the documentation to present a balanced account of outcomes rather than framing this as an unqualified success for conservation"*	Noted. This project has appropriately implemented the mitigation hierarchy, with an initial focus on avoidance through the two Structured Decision Making processes which have been applied.
Growland, 2025	*"We note that Council's draft BCS framework suggests that offsets should ideally be contiguous with existing conservation areas. While this objective is understandable at a strategic level, it presents several issues. Growland's secured offsets are located in another municipality, well outside of the Northern Growth Area. These offsets were secured legally and reasonably based on earlier expert guidance. Requiring offsets to be adjacent or contiguous would retrospectively disadvantage landowners who acted in good faith.* *We therefore request that the Strategic Assessment explicitly confirms that offsets do not need to be contiguous to be accepted and existing offset remain valid and can be applied to Growland's EPBC obligations."*	The BCS and the EPBC Plan allow for a combination of offsets to be delivered within the Growth Areas, and external to the Growth Areas. While the strategic offset guiding principles (as referenced in the submitters comment) includes a reference to offsets being connected to an existing conservation reserve, this principle is not mandatory, and does not refer exclusively to the conservation areas within the Growth Areas. The BCS has been updated to clarify this. It is noted that the City is aware of Growland's offsets and have factored these in when working on the offset program.
Ramsar wetlands		
Corangamite Catchment Management Authority, 2023	*"Considerations for stormwater, particularly in relation to Ramsar and flows down the Moorabool, from the work the CCMA does in the Ramsar site, needs to consider:* • *The quantity and quality of the flow reporting to the Moorabool and then any impact this will have on the receiving waters of Reedy Lake, Hospital Swamp and Lake Connewarre i.e., changes to hydrology regime, salinities, salt wedge etc.* • *Any exacerbated risk of flooding from additional storm water and surface water runoff reporting to the Moorabool in wet years of large storm events, increasing the risk of inundation in the aforementioned receiving wetlands, which negatively impact the Ramsar wetlands.*	The EPBC Plan includes a Commitment (15) which requires additional specific mitigation measures to minimise the indirect impacts of the development on MNES associated with waterways, riparian areas and wetlands including the Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar site. One of the associated Measures (57) requires that technical studies are undertaken to understand the key risks from development on protected matters associated with Hovells Creek and the Moorabool River (including the Ramsar site). These studies will: • Address potential risks associated with changes to water quality and hydrology as a result of development within the Growth Areas • Identify appropriate measures, standards or targets to avoid and minimise adverse impacts on protected matters

Submitter	Comment/s	Response
	• *The type of infrastructure needed to manage stormwater onsite (i.e., stormwater retention systems, water efficiency infrastructure, housing efficiency infrastructure requirements) and changing the mentality that rivers can be used as 'drains'."*	The Corangamite CMA is identified as a key support partner for this measure. Overall process is considered appropriate to address potential indirect impacts to the Ramsar site.
Restoration		
Submitter 9, 2023	*"Restoration of some of the grassland in the Northern and Western Geelong Growth Areas would greatly benefit native biodiversity and align the Geelong Growth Areas to the Nature Positive movement."*	The strategic assessment will establish two key grassland conservation areas in the NGGA. These areas will be protected and managed for conservation, with opportunities to improve the condition of biodiversity values over time. This includes actions such as weed and pest control, restoration, and ongoing monitoring to support and enhance these values.
North West Alliance, 2023	*"Restoration should be a core principle of the Geelong Strategic Assessment. Restoration is essential to reversing the impacts of colonial invasion, and for strengthening ecosystems that are facing the increasingly sever manifestations of climate change."*	As above.
Socio-economic impact assessment		
Landholder of 135 Staceys Road, 2025	*"Socio-economic impact assessment* *5.1. A socio-economic impact assessment is required by the EPBC Act to be undertaken. The Original Submission identified multiple failings in the socio-economic impact assessment, to conclude that it was flawed. Chapter 26 of the SAR remains largely unchanged from the earlier consultation version. The matters raised in the Original Submission therefore remain applicable today. They are not repeated here, and are set out in the enclosure.* *5.2. The issue of housing provision and affordability has been significantly amplified at a federal, state and local level since the earlier consultation materials were prepared. For the socio-economic impact assessment to not have regard to this is disappointing and evinces the unbalanced (and therefore flawed) assessment undertaken.* *5.3. It is also concerning that the assessment has not been updated to take into account the monetary figures now incorporated into the materials. It is fair to say that the Biodiversity Levy being estimated at $81,090 per net developable hectare8 is a minimum, and it will no doubt increase as a result of the staged preparation of PSPs and DCPs across the NGGA and as land values, offset purchase prices and other rates increase over time"*	The socio-economic impact assessment at Chapter 26.3 of the SAR is considered to be an appropriate assessment of the proposal. The socio-economic impact assessment does have regard to housing provision and affordability. This is summarised under "Housing" at pages 26-10 and 26-11 of the SAR, including the following statements: • Recently (partly the result of the COVID-19 pandemic), housing availability has not adequately kept pace with demand, which has led to high house and land prices (Ratio, 2022). This trend has been seen across most of Australia and supply of affordable housing is needed (Informed Decisions, 2022; Ratio, 2022). The Framework Plan was developed in consideration of the projected increase in Geelong's growth and aimed to help supply the urban land required to support Geelong's future growth • The development supported by the Plan aims to provide a sustainable and diverse mix of housing and accommodation to support future residents and visitors of Geelong. Diverse housing is important for the success of new urban areas, as it attracts a range of potential residents at all stages of their life. The City intends to provide a mix of low-rise, multi-unit and clustered housing types, along with

Submitter	Comment/s	Response
		aged-care and affordable, community and social housing options (The City of Greater Geelong, 2021) • The Growth Areas have the capacity to accommodate 110,000 new residents. In addition to residential housing, a range of other accommodation types will also be provided including hotels, motels and caravan and camping parks. Existing rural living spaces will also be retained in some areas, providing opportunities for agriculture and rural industry (The City of Greater Geelong, 2021) • The increased availability and variety of housing options provided in the Growth Areas may relieve pressure on the current housing market and result in positive socio-economic impacts for current and future residents of Geelong The submitter is correct that the biodiversity levy in the exhibited Funding Program is likely to increase over time for the factors stated e.g. land value and external offset price increases. The costs in the Funding Program will be indexed and re-valued over time to ensure the levy provides full cost recovery to the City as the approval holder of the Part 10 approval which facilitates development of the Growth Areas.
Landholder of 135 Staceys Road, 2025	*"The expected population figures that are set out in the Plan, SAR and associated documents are as per the adopted Framework Plan, and do not take into consideration that the NGGA will in fact accommodate less people in the future, if the Site is removed from residential land supply"*	The estimated population figures in the Northern and Western Geelong Growth Areas Framework Plan are considered appropriate for high level planning and socio-economic impact assessment. As the City starts preparing Precinct Structure Plans (such as Elcho Road East PSP) more accurate figures are being estimated as the net developable area is better understood. More recent PSP estimates indicate a higher population than expected in the Framework Plan. This includes allowances for additional conservation land on 135 Staceys Rd.
Landowner of 135 Staceys Road, 2025	*"The only impact identified under the aspect of 'personal and property rights' is that land use will change. It does not at all consider those few affected landowners whose landholdings will be blighted without any or adequate, and timely, compensation, in exchange for providing significant benefits to the NGGA as a whole and all participants within it."*	The socio-economic impact assessment has been revised to include 'change in development opportunity' as a component under 'their personal and property rights' to address this comment.
Bisinella, 2023	*"Bisinella Developments has previously made submissions that Council should undertake a comprehensive economic assessment of the considerable initiatives and costs proposed by the draft PSP and DCP to ensure that it is economically viable. Part of this assessment should include the impact of the Cowies Creek Conservation Area (as well as other initiatives set out in the EPBC Plan) on the precinct. This needs to occur now, as there is little utility in proceeding with a Strategic Assessment process to support development which is unfeasible."*	The expected biodiversity levy required to implement the EPBC Funding Program for the Western Growth Area is in the order of $44,000 per hectare. This cost is considered reasonable and is not considered likely to make development unviable. To provide context the draft Development Contributions Plan levy for the Creamery Road precinct is in the order of $800,000 per hectare making the biodiversity levy equivalent to 5% of the DCP levy.

Submitter	Comment/s	Response
Bisinella, 2023	*"It is therefore essential that the economic impact of the EPBC Plan on the development feasibility of the Bisinella Land and the precinct more broadly be properly considered and understood through this Strategic Assessment process. A failure to address the economic impact on development feasibility which renders the Bisinella Land as undevelopable will mean the EPBC Plan will fail to meet its overarching objective in relation to the long term viability of the GGF and the delivery of the NGGWA Framework Plan."*	The Strategic Assessment Report does include a socio-economic impact assessment at Chapter 26.3. In addition, the City's comments above outlining the comparatively low amount of the biodiversity levy compared other development costs provides a response to this issue.
Stormwater management		
Corangamite Catchment Management Authority, 2023	*"Direct impact of development on increased stormwater discharge needs to be managed appropriately to ensure downstream waterways and wetlands are not adversely impacted.* *Standard stormwater management measures in the Geelong Planning Scheme have been shown to fall short of protecting downstream waterways and wetlands and need to be supplemented with at source management measures."*	The EPBC Plan includes a Commitment (15) which requires additional specific mitigation measures to minimise the indirect impacts of the development on MNES associated with waterways, riparian areas and wetlands. One of the associated Measures (57) requires that technical studies are undertaken to understand the key risks from development on protected matters associated with Hovells Creek and the Moorabool River (including the Ramsar site). These studies will: • Address potential risks associated with changes to water quality and hydrology as a result of development within the Growth Areas • Identify appropriate measures, standards or targets to avoid and minimise adverse impacts on protected matters including This commitment, and the associated measures, will be implemented in addition to standard mitigation measures (Commitment 13). This approach is considered appropriate to address potential indirect impacts associated with changes to stormwater.
Barwon Water, 2025	*"A significant amount of work has been undertaken over the past two years by the Barwon IWM Forum to understand the potential impact of additional stormwater volume generated at the growth areas on important downstream water bodies, including Cowies Creek, Hovells Creek, Limeburners Bay and Lake Connewarre. This work should be referenced and used to inform the requirements and processes outlined in the documents"*	The City acknowledges the work associated with the IWM Forum of which the City and its officers have been active participants. Work undertaken by the Barwon IWM Forum has occurred concurrently to the development and approval process of the Strategic Assessment. This concurrent work was considered in the preparation of the Strategic Assessment and will be considered in detail during PSP preparation and Technical Studies as they relate to Hovells Creek and Moorabool River. These Technical studies will be written in association with and complement relevant Development Services Scheme's and will address potential impacts to the Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar Site. Impacts to Cowies Creek as they relate to additional stormwater volume have been considered by the SAR and will be addressed through the delivery of the Cowies Creek

Submitter	Comment/s	Response
		Conservation Area and the associated Conservation Management Plan. This will include the delivery of offline dedicated Growling Grass Frog wetlands.
Barwon Water, 2023	*"Barwon Water note that the potential impacts raised regarding changes to water flows and quality on downstream important Ramsar sites or conservation areas could potentially be lessened or mitigated by pursuing opportunities raised in the GANWG IWM plan such as the retention of stormwater within the landscape and a regional stormwater harvesting to potable scheme."*	Impacts to components/areas of the Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar Site are to be addressed through the delivery of the Hovells Creek and Moorabool River Technical Studies. The Hovells Creek Technical study will address potential impacts to Limeburner's Bay. The Moorabool River Technical Study will address potential impacts to Lake Connewarre complex. These studies will be developed in association with and to complement the Development Services Scheme of Elcho Road East and Batesford North precincts respectively. Recommendations as they relate to IWM measures will then be implemented through the delivery of associated PSP's and its guidelines and requirements.
Barwon Water, 2023	*"Action W1.3.2 references masterplans to be developed for Cowies Creek and the Barwon and Moorabool rivers "for integrated water management and to protect riparian corridors along waterways". This work should build on the work completed through the existing GANWG IWM plan.*	Table 2-1 in the Plan identifies relevant actions from the Framework Plan that have relevance to the SA. However, The Plan is not responsible for direct achievement of these actions and this table was provided more for general context. We do note however that Work completed through the existing GANWG IWM Plan will be built on through PSP development, and the delivery of the Hovell's Creek and Moorabool River Technical studies and the associated Development Services Scheme's as the Plan is implemented.
Barwon Water, 2023	*"The GANWG IWM Plan which was developed in partnership by CoGG, Barwon Water and DEECA should be listed as a key supporting plan."*	This document is now specifically listed in the strategic assessment documentation. The Plan will be considered in detail during PSP development, the delivery of the Hovell's Creek and Moorabool River Technical studies and the associated Development Services Scheme's.
Timing		
SIG Group, 2025	*"There are other matters which require additional clarification which would afford all landowners and stakeholders further insight and confidence to support the Referral to proceed, these include…* *Likely timeframes for ultimate EPBC approval, noting that additional work is still required before the Referral is provided to the Commonwealth for approval"*	There is no fixed statutory timeframe for Commonwealth approval under Part 10 of the EPBC Act, and the timing of the Minister's decision following submission of the final documentation cannot be presumed.
SIG Group, 2025	*"There are other matters which require additional clarification which would afford all landowners and stakeholders further insight and confidence to support the Referral to proceed, these include… Advice on the alignment of the EPBC approval with Creamery Road PSP gazettal, to ensure that both approvals proceed harmoniously without further delay"*	The City is proposing to submit the final Strategic Assessment document package to the Commonwealth in September 2026. EPBC approval is anticipated by the end of 2026/early 2027. The Creamery Road PSP is progressing through draft planning scheme amendment C450ggee and is also expected to be approved by the Victorian Minister for Planning within a similar timeframe. No significant delays are anticipated based on

Submitter	Comment/s	Response
		these timeframes noting that approval of the PSP and Strategic Assessment is by the State and Commonwealth governments respectively and out of the City's control.
SIG Group, 2025	*"There are other matters which require additional clarification which would afford all landowners and stakeholders further insight and confidence to support the Referral to proceed, these include… Timeframes for Native Vegetation Precinct Plan preparation to ensure the timeframes for this work align with planning permit lodgement and approvals"*	Native Vegetation Precinct Plans (NVPPs) deal with State native vegetation matters and when approved are listed under the Schedule to Clause 52.16 of the Planning Scheme. A draft Creamery Road NVPP was exhibited with draft Amendment C450ggee and will be approved under this amendment alongside the PSP. The NVPP is required under Section 10 of Guidelines for the removal, destruction or lopping of native vegetation (Department of Environment, Land, Water and Planning, 2017) (State Guidelines).
SIG Group, 2025	*"Clarification on whether further specific mitigation measures or guidelines to manage MNES impacts will be prepared by Council as suggested in the EPBC Plan."*	Specific mitigation measures are identified in the Commitments of the EPBC Plan (see Commitments 14 and 15). The Commitments and Measures document identifies the City as the responsible party for preparing these measures.
Villawood, 2025	*"Risks Associated with Linking the PSA to the Strategic Assessment: The current approach, which embeds specific consent requirements within the Urban Growth Zone (UGZ) as part of the Planning Scheme Amendment (PSA) for the Creamery Road PSP, effectively makes the progression of the PSA dependent on the resolution and federal approval of the Strategic Assessment. Should there be delays in securing this federal approval, we are concerned that the Minister may, in turn, postpone or withhold sign-off on the gazettal of the PSA, thereby stalling the delivery of much-needed housing and infrastructure."*	This issue was addressed in the response to SIG Group's submission earlier as follows: the City is proposing to submit the final Strategic Assessment document package to the Commonwealth in September 2026. EPBC approval is anticipated by the end of 2026/early 2027. The Creamery Road PSP is progressing through draft planning scheme amendment C450ggee and is also expected to be approved by the Victorian Minister for Planning within a similar timeframe. No significant delays are anticipated based on these timeframes noting that approval of the PSP and Strategic Assessment is by the State and Commonwealth governments respectively and out of the City's control.
Villawood, 2025	*"We are concerned that objections from Northern Growth Area submitters may cause significant delays to the Strategic Assessment and, in turn, the Creamery Road PSP. The complexity of covering multiple growth areas under one framework increases the risk that unresolved issues in the north could stall progress for all precincts. In contrast, the Western Growth area does not face the same level of complexity, as it does not contain federally listed grass communities or other species such as the Golden Sun Moth. This distinction means that the Western Growth area is less likely to encounter the ecological and regulatory challenges present in the Northern Growth area. To ensure timely delivery of housing and infrastructure in Creamery Road, we urge Council to implement measures enabling its independent progression if delays occur elsewhere, and to clarify how such risks will be addressed."*	As previously stated, if the approvals for the Creamery Road PSP (Amendment C450) and the Strategic Assessment occur as planned (both by the end of 2026) there should be no significant delays caused by the Northern Growth Area issues. In the event the Northern Growth Area causes significant delays to obtain the EPBC Act approval of the Strategic Assessment and this impacts the ability of land in the Creamery Road precinct to develop, there are three options: • Waiting until the Part 10 Approval is granted, then proceed in accordance with that approval; or • Creamery Road developers referring their own proposed development actions to the relevant Commonwealth Minister and proceed through the formal individual EPBC Act assessment process. • The City can seek to have the Part 10 EPBC Approval split whereby the Western Growth Area components are approved first and the Northern Growth Area is approved later when issues are resolved.

Submitter	Comment/s	Response
Transparency		
Submitter 14, 2023	*"In order for the Geelong community to monitor the City of Greater Geelong's adherence to the Plan, there needs to be a commitment within its pages to transparency. There must be requirements written in the plan for public access to all the development and conservation management documents, ecological surveys, offsetting calculations, precinct structure plans, native vegetation precinct plans and other matters likely to be required in the implementation of the Plan."*	The City of Greater Geelong's adherence with the Plan will be assessed in accordance with the requirements of the Part 10 approval under the EPBC Act. Adherence will be demonstrated by satisfying the commitments and measures of the NWGGA strategic assessment and by the specific conditions of the Part 10 approval when granted by DCCEEW. The EPBC approval's include a public disclosure condition requiring the proponent to publish compliance documentation on a publicly accessible website. This website will be accessible by members of the Geelong Community. Note offset calculations are determined pre approval and impacts and associated offset requirements are documented within the exhibited strategic assessment documentation. Furthermore implementation of the Plan will also be demonstrated through the development of NWGGA PSP's. During their preparation PSP's will be subject to statutory public exhibition as required by the planning scheme amendment process. This will allow an additional mechanism of transparency and opportunity for public input and comment and also require the City to demonstrate compliance with state legislation and policy. As part of this process the City will have to prepare Native Vegetation Precinct Plans to the satisfaction of DEECA. The City is actively engaging with DEECA in the preparation of those plans.
North West Alliance, 2023	*"SDM data of sufficient detail to allow informed public comment should be made available for public comment before any Ministerial signoff."*	The SDM report was provided in the updated 2025 strategic assessment documentation for public exhibition (Supporting Document C to the SAR). This document will be included in the final submission for approval.
North West Alliance, 2023	*"We need strong assurances that transparency will be at the heart of the City of Greater Geelong decision-making. Oversight is essential. The community has a right to know the basis on which the many assessments, plans, surveys and funding schemes are made. Geelong will make publicly available all the development and conservation management plans, ecological surveys, offsetting calculations and other matters likely to be required in the implementation of the Geelong Strategic Assessment."*	As above, the City of Greater Geelong's adherence with the Plan will be assessed in accordance with the requirements of the Part 10 approval under the EPBC Act. Adherence will be demonstrated by satisfying the commitments and measures of the NWGGA strategic assessment and by the specific conditions of the Part 10 approval when granted by DCCEEW. The EPBC approval's include a public disclosure condition requiring the proponent to publish compliance documentation on a publicly accessible website. This website will be accessible by members of the Geelong Community. Note offset calculations are determined pre approval and impacts and associated offset requirements are documented within the exhibited strategic assessment documentation. Furthermore implementation of the Plan will also be demonstrated through the development of NWGGA PSP's. During their preparation PSP's will be subject to

Submitter	Comment/s	Response
		statutory public exhibition as required by the planning scheme amendment process. This will allow an additional mechanism of transparency and opportunity for public input and comment and also require the City to demonstrate compliance with state legislation and policy. As part of this process the City will have to prepare Native Vegetation Precinct Plans to the satisfaction of DEECA. The City is actively engaging with DEECA in the preparation of those plans.
Zoning decisions / status of land		
Landowner of 225 and 195 Staceys Road, 2025	*"City of Greater Geelong prepared a site-specific rezoning to change 135 Staceys Road from Farming Zone (FZ) to UGZ in 2023. As stated in the Panel Report "the amendment corrects an omission from Amendment C395ggee which rezoned land in the NGGA to the UGZ to facilitate the implementation of the Framework Plan but omitted to rezone the subject land.* *Despite all the evidence in front of City of Greater Geelong, Department of Transport and Planning and the Panel regarding biodiversity and buffer controls on 135 Staceys Road, the amendment C437 was approved. City of Greater Geelong should be investigating why Amendment C437 was prepared and implemented."*	The City of Greater Geelong undertook Planning Scheme Amendment C437ggee to correct an omission in amendment C395ggee, which rezoned land in the Northern and Western Geelong Growth Areas to the Urban Growth Zone, to facilitate the implementation of the Northern and Western Geelong Growth Areas Framework Plan (August 2020). C437ggee went through the full public amendment process and was approved by the Minister's delegate. No investigation is required.
Landowner of 225 and 195 Staceys Road, 2025	*"There is no publicly available information stating that an evidence-based buffer for Chemring was completed. The assumption therefore is that 135 Staceys Road is still very much within the 1,000 metre Chemring buffer. If this is incorrect, we request that the reduced Chemring buffer evidence be made available."*	The 1,000m Lara Energetic Material Manufacturing Plant (Chemring) buffer is clearly mapped and discussed in the published Northern and Western Geelong Growth Area Framework Plan 2021 at p.84. Action N1.7.7 of the Framework Plan states: "*Local businesses will be protected by establishing industrial buffer zones, including:* • *A default buffer of 1,000 metres to the Lara Energetic Material Manufacturing Plant, subject to technical confirmation."* In recent months the City has received confirmation from WorkSafe that the buffer to this Major Hazard Facility is required.

References

AECOM (2025) "Growling Grass Frog Conservation Management Plan."

Biosis (2024) "Victorian Grassland Earless Dragon, targeted surveys, and habitat suitability assessment - Geelong Growth Areas."

Biosis (2026) "Conservation Management Plan for the Cowies Creek Conservation Area."

DELWP (2017) "Habitat Importance Models." Department of Environment, Land, Water and Planning.

DELWP (2022) "Native Vegetation - Modelled 1750 Ecological Vegetation Classes." Department of Environment, Land, Water and Planning. Available at: https://discover.data.vic.gov.au/dataset/native-vegetation-modelled-1750-ecological-vegetation-classes.

DELWP (2025) "Victorian Biodiversity Atlas." Department of Environment, Land, Water and Planning. Available at: https://www.environment.vic.gov.au/biodiversity/victorian-biodiversity-atlas.

DEWHA (2009) "EPBC Act Policy Statement 3.14: Significant impact guidelines for the vulnerable Growling Grass Frog (*Litoria raniformis*)." Department of Environment, Water, Heritage and Arts.

DSEWPC (2011) "A guide to undertaking strategic assessments." Department of Sustainability, Environment, Water, Population and Communities.

EHP (2021) "Existing Ecological Conditions: Northern and Western Geelong Growth Areas." Prepared for the City of Greater Geelong.

Geelong Region Alliance (2007) "The Geelong Region Plan." G21 Geelong Region Alliance.

Informed Decisions (2022) *Welcome to the City of Greater Geelong Community Profile*. Available at: https://profile.id.com.au/geelong.

Ratio (2022) *Geelong Residential Supply and Demand Assessment*.

The City of Greater Geelong (2021) "The Northern and Western Geelong Growth Areas Framework Plan."

THE CITY OF
GREATER GEELONG

NORTHERN AND WESTERN GEELONG GROWTH AREAS

EPBC PLAN

JULY 2026

CITY OF GREATER GEELONG

ACKNOWLEDGEMENT OF COUNTRY

Greater Geelong is located on the traditional lands of the Wadawurrung people. The land was created by the great ancestor spirit, Bunjil, the wedge-tailed eagle. Wadawurrung territory extends from the great dividing range in the north to the coast around Port Phillip Bay.

The city acknowledges the Wadawurrung people as the traditional owners of this land who to this day practice their culture and uphold the dignity of their ancestors.

DOCUMENT TRACKING

This document was prepared on behalf of the City of Greater Geelong by Biosis and Open Lines.

PREPARED BY:	
Mitchell Ross, Tom Holden, Heidi Birkby, Peter Hemphill (Open Lines)	
REVIEWED BY:	
Mitchell Deaves (Biosis), Peter Hemphill (Open Lines)	
VERSION CONTROL:	
VERSION:	Final
DATE:	July 2026

Contents

1 INTRODUCTION 1

1.1 The Strategic Assessment 1

1.2 Purpose of the Plan 2

1.3 Overview of the Plan and supporting documents 2

1.4 Area covered by the Plan 5

1.5 Timing for implementation of the Plan 9

1.6 Regulatory context and legal effect of the Plan 9

1.7 Responsibilities for implementing the Plan 10

2 CONTEXT FOR DEVELOPING THE PLAN 11

2.1 Biodiversity values and challenges 11

2.2 Social and economic context 12

2.3 Planning context 14

3 OBJECTIVE AND OUTCOMES OF THE PLAN 19

3.1 Introduction 19

3.2 Outcomes framework 19

3.3 Objective of the Plan 20

3.4 Outcomes of the Plan 20

3.5 Commitments 21

3.6 Measures 21

4 DEVELOPMENT SUPPORTED BY THE PLAN 23

4.1 Introduction 23

4.2 Location of development 23

4.3 Development classes of actions 26

4.4 Persons who can undertake development and their obligations 32

4.5 Changes to the boundaries of land subject to development 32

4.6 Cross-boundary developments 33

5 CONSERVATION FRAMEWORK 35

5.1 Introduction 35

5.2 Purpose of the conservation framework 35

5.3 Relevant protected matters 35

5.4 Avoidance and minimisation of impacts 37

5.5 Mitigation of impacts 43

5.6 Residual adverse impacts and offsets 45

6 PROCESS BASED DEVELOPMENT 50

6.1 Introduction 50

6.2 Approval context for process based development 51

6.3 Requirements for process based development 51

6.4 Commitments for process based development 52

6.5 Avoidance and minimisation of impacts 53

6.6 Mitigation of impacts 53

6.7 Offsets for residual impacts 54

7 ASSURANCE AND IMPLEMENTATION FRAMEWORK 55

7.1 Introduction 55

7.2 Purpose of the assurance and implementation framework 55

7.3 Governance framework 55

7.4 Funding framework 63

7.5 MERI framework 64

7.6 Compliance framework 75

7.7 Data management process 78

7.8 Process for changing the Plan and implementation documents 79

REFERENCES 82

List of Figures

Figure 1-1: Strategic assessment documents....4

Figure 1-2: Location of the Strategic Assessment Area and Growth Areas....6

Figure 1-3: Precincts within the Strategic Assessment Area....7

Figure 1-4: Administrative context of the Study Area, Strategic Assessment Area and Growth Areas....8

Figure 4-1: Development and conservation land within the Strategic Assessment Area....25

Figure 7-1: Governance structure for implementing the Plan....60

Figure 7-2: Components in the MERI framework for the Plan....66

Figure 7-3: Application of MERI....74

List of Tables

Table 1-1: Plan structure and content....2

Table 2-1: Summary of how each part of the planning system hierarchy will be used to implement the Plan....17

Table 3-1: Definition of the components of the outcomes framework....20

Table 3-2: Outcomes of the Plan....21

Table 4-1: Commitments for development....23

Table 4-2: Development types and example impact activities included in urban and commercial development class of actions....26

Table 4-3: Development types and example impact activities included in industrial development class of actions....28

Table 4-4: Development types and example impact activities included in rural development class of actions....28

Table 4-5: Development types and example impact activities included in supporting infrastructure and services class of actions....29

Table 4-6: Activity types and example activities included in environmental management class of actions....30

Table 5-1: Relevant species and ecological communities....36

Table 5-2: Commitments for avoidance....38

Table 5-3: Commitments for mitigation....43

Table 5-4: Commitments for offsetting....46

Table 5-5: Offset requirements for Natural Temperate Grassland, Striped Legless Lizard and Golden Sun Moth....47

Table 6-1: Commitments for process based development....52

Table 7-1: Commitments for governance....55

Table 7-2: Potential roles and responsibilities of support partners....58

Table 7-3: Key stakeholders that will be included in the Stakeholder Engagement Strategy and their likely main interests....61

Table 7-4: Commitment for funding 63

Table 7-5: Commitments for MERI....65

Table 7-6: Types of monitoring data that will be collected....67

Table 7-7: Draft Key Evaluation Questions....69

Table 7-8: Categories of options for adaptive management....71

Table 7-9: Commitment for compliance 75

Table 7-10: Responsibilities for two types of compliance relevant to implementing the Plan....75

Table 7-11: Commitment for data management....79

Acronyms and terms

Acronyms	Meaning
BCS	Biodiversity Conservation Strategy
DCCEEW	Commonwealth Government Department of Climate Change, Energy, the Environment and Water (DCCEEW)
DEECA	Victorian Government Department of Environment, Energy and Climate Action
DELWP	The former Victorian Government Department of Environment, Land, Water and Planning (now DEECA and DTP)
DTP	Victorian Government Department of Transport and Planning
EPBC Act	Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*
FPAL	Finalised priority assessment list
IBRA	Interim Biogeographic Regionalisation for Australia
KPI	Key Performance Indicator
LGA	Local Government Authority
MERI	Monitoring, evaluation, reporting and improvement
MNES	Matters of National Environmental Significance
NEPA	National Environmental Protection Agency
NGGA	Northern Geelong Growth Area
NVPP	Native Vegetation Precinct Plan
P&E Act	Victorian *Planning and Environment Act 1987*
PPF	Planning Policy Framework
PSP	Precinct Structure Plan
SAR	Strategic Assessment Report
TEC	Threatened ecological community
ToR	Terms of Reference
UGZ	Urban Growth Zone
VPP	*Victoria Planning Provisions*
WGGA	Western Geelong Growth Area
WIK	Works in Kind

Terms / Abbreviations	Definition
BCS guiding principles	A set of principles to guide both the preparation of the BCS and the decisions that will need to be made as part of the strategy's implementation
Conservation Management Plan	The document used to provide for the protection and ongoing management of the biodiversity values within each strategic conservation area
Construction Environmental Management Plans	A plan developed to ensure appropriate environmental management practices are implemented during the construction phase of a project
Cowies Creek Conservation Area	The section of Cowies Creek within the WGGA to be protected and managed for conservation purposes under the Plan

Terms / Abbreviations	Definition
Development land	Specified land within the Strategic Assessment Area where development under the Plan is proposed to occur
Development under the Plan	The broad term used to describe all development occurring under the Plan. This includes the following classes of actions: • Urban and commercial development • Industrial development • Rural development • Supporting infrastructure and services • Environmental management
Eastern Conservation Area	Area of land within the NGGA to be protected and managed for conservation purposes under the Plan
Evaluation questions	The questions used to evaluate the Plan in regard to the achievement of outcomes and implementation of commitments
External infrastructure	Development comprising the supporting infrastructure and services class of action and the environmental management class of action that is located outside of Growth Areas but within the Strategic Assessment Area
Gully avoidance area	Area of land within the NGGA to be avoided for the purpose of minimising impacts to biodiversity
Land subject to development	Development land within the Growth Areas subject to all classes of actions under the Plan
Moorabool avoidance area	Area of land within the WGGA to be avoided for the purpose of minimising impacts to biodiversity
Moorabool River corridor	Area of land within the WGGA to be avoided for conservation under the Plan
Northern Conservation Area	Area of land within the NGGA to be protected and managed for conservation purposes under the Plan
Process based development	Development that is subject to an additional process prior to development occurring. This includes: • Development within part of the Heales Road East precinct • External infrastructure development
Specific mitigation measures	Additional mitigation measures beyond those delivered through the existing planning system to address specific risks to MNES associated with the implementation of the Plan
Stakeholder engagement strategy	A process for stakeholder engagement to guide the City in undertaking ongoing engagement with key stakeholders over the life of the Plan
Standard mitigation measures	Mitigation measures delivered by the Victorian planning system through the PSP process, existing provisions in the Greater Geelong Planning Scheme, and the planning permit process
Strategic Assessment Executive Leadership Group	The primary body responsible for overseeing and making decisions about the implementation of the Plan
Strategic Assessment Implementation Group	The primary body responsible for day-to-day implementation of the Plan
Strategic conservation area	Areas within the Growth Areas that will be avoided from development and protected and managed for conservation in-perpetuity
The City	The City of Greater Geelong
The Framework Plan	*Northern and Western Geelong Growth Area Framework Plan*

Terms / Abbreviations	Definition
The Growth Areas	Northern and Western Geelong Growth Areas
The Minister	Commonwealth Minister for the Environment
The Plan	The Northern and Western Geelong Growth Areas EPBC Plan (this document)
Works in Kind	A contribution in lieu of payment of the biodiversity levy amount

1 Introduction

1.1 THE STRATEGIC ASSESSMENT

The City of Greater Geelong (the City) has identified two key areas for urban growth in Geelong's northwest in the Northern and Western Geelong Growth Areas (the Growth Areas).

The Growth Areas were identified through several State planning strategies for future growth. The City subsequently developed the *Northern and Western Geelong Growth Areas Framework Plan* (the Framework Plan) (The City of Greater Geelong, 2021), which describes the Growth Areas and outlines considerations for their future development until 2047.

Geelong is considered to be Victoria's primary growth and population centre outside of Melbourne and contains numerous assets that are vital for the State's social, economic and environmental sustainability (Victoria State Government, 2017). The Growth Areas are the key areas identified for development to support Geelong's long-term growth. This growth is driven by a strong economy and employment opportunities that are expected to continue in the coming decades (Geelong Region Alliance, 2007; The City of Greater Geelong, 2021).

Development within the Growth Areas and associated infrastructure development outside the Growth Areas will lead to impacts to biodiversity values protected under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) and biodiversity values protected under Victorian biodiversity regulations.

To support development in the Growth Areas and protect matters of national environmental significance (MNES), the City has undertaken a strategic assessment under Part 10 of the EPBC Act. This enables a landscape scale assessment and approval of a suite of development actions under the Act and provides the opportunity to deliver improved environmental and development outcomes compared to project-by-project assessments through strategic consideration of biodiversity issues.

As part of the strategic assessment process, the City has prepared the *Northern and Western Geelong Growth Areas EPBC Plan* (the Plan). The Plan (this document) gives effect to the outcomes of the strategic assessment process. It was prepared in accordance with the Endorsement Criteria in the Agreement to undertake the strategic assessment (Strategic Assessment Agreement, 27 January 2022) between the Commonwealth Minister for the Environment (the Minister) and the City.

1.1.1 PUBLIC EXHIBITION AND FINALISATION OF THE PLAN

The Strategic Assessment documentation, including the Plan, was publicly exhibited on two occasions. Public exhibition of the documentation is a requirement under the EPBC Act (see Section 1.6.1).

The first round of public exhibition took place from July to September 2023 to provide an opportunity for the community and other stakeholders to provide feedback on the documents through formal submissions.

Following the first public exhibition period, the rediscovery of the Victorian Grassland Earless Dragon in Victoria was publicly announced. Subsequently, significant work was undertaken in order to:

- Understand the potential presence of Victorian Grassland Earless Dragon in the Growth Areas and update the Plan to address the species
- Address comments from the previous public exhibition period

After these updates were made, a second round of public exhibition took place from November to December 2025 to provide an opportunity for public feedback on the updated documents.

This version of the Plan represents the final Plan for regulatory approval and implementation, and has been updated to address the comments from both the first and second rounds of public exhibition.

A detailed summary of the Strategic Assessment process is provided in Supporting Document E to the Strategic Assessment Report. The key themes and issues raised through public submissions, and responses to these submissions, are summarised in the *NWGGA Strategic Assessment Public Submissions Summary Report*.

1.2 PURPOSE OF THE PLAN

The purpose of the Plan is to ensure development within the Growth Areas and associated infrastructure development outside the Growth Areas protects MNES and proceeds in accordance with the requirements of the EPBC Act.

The Plan:

- Describes the development (classes of actions) for which approval is being sought under the EPBC Act
- Sets out an objective, and a series of outcomes and commitments to define what the Plan will achieve
- Sets out a conservation framework to address the impacts of the development on MNES, including through avoiding and minimising, mitigating, and offsetting residual impacts
- Sets out an assurance and implementation framework to implement the Plan

The Plan recognises the importance of the biodiversity values within the Greater Geelong area for MNES and will facilitate Geelong's future growth by streamlining EPBC Act approvals and ensuring implementation is cost efficient in its support of both urban growth and the protection of MNES.

The commitments in the Plan represent agreed pledges by the City (the approval holder) (see Section 1.7.1) for undertaking actions to address impacts to MNES. The approval holder will be responsible for the delivery of these commitments over the life of the Plan.

1.3 OVERVIEW OF THE PLAN AND SUPPORTING DOCUMENTS

1.3.1 THE PLAN STRUCTURE

Table 1-1 outlines the structure of the Plan and briefly describes the content of each chapter.

Table 1-1: Plan structure and content

Plan chapter	Description of chapter
Chapter 1: **Introduction**	Introduces the strategic assessment, the purpose of the Plan, the regulatory context for the Plan, and responsibilities for its implementation
Chapter 2: **Context for developing the Plan**	Describes the context and need for the Plan in relation to social, economic, and environmental factors of the region
Chapter 3: **Objective and outcomes of the Plan**	Describes the outcomes framework for the Plan that includes an objective and outcomes that the Plan aims to achieve, and a series of commitments that will be delivered to achieve these outcomes
Chapter 4: **Development supported by the Plan**	Details the types of development (the classes of actions) that endorsement and approval under Part 10 of the EPBC Act will cover, including the scope and location of the development
Chapter 5: **Conservation framework**	Describes the conservation framework for the Plan, including the commitments that the Plan will deliver to avoid and minimise, mitigate and offset the impacts of the development on MNES
Chapter 6: **Process based development**	Describes how development within parts of the Heales Road East precinct, and external infrastructure development located outside the Growth Areas within the Strategic Assessment Area will be delivered
Chapter 7: **Assurance and implementation framework**	Describes the assurance and implementation framework for the Plan that sets out how it will be implemented and what assurance mechanisms will be put in place to ensure the Plan's outcomes are achieved

1.3.2 SUPPORTING DOCUMENTS

The Plan is supported by four documents. These include:

- Three implementation documents:
  - The Northern and Western Geelong Growth Areas Commitments and Measures
  - The Northern and Western Geelong Growth Areas Biodiversity Conservation Strategy (BCS)
  - The Northern and Western Geelong Growth Areas Funding Program
- A Strategic Assessment Report (SAR)

Figure 1-1 shows the relationship between the documents associated with the strategic assessment.

The three implementation documents do not form part of the Plan to be endorsed by the Minister under Part 10 of the EPBC Act. Once the Plan is endorsed under Part 10 of the EPBC Act, changes to the Plan can only be made with endorsement from the Minister in accordance with Part 10, Subdivision BA of the EPBC Act. However, the measures set out in the implementation documents may be updated from time to time as part of adaptive management (see Section 3.2), without endorsement from the Minister.

COMMITMENTS AND MEASURES DOCUMENT

The Plan identifies a broad objective and national level outcomes relating to the protection of MNES under the EPBC Act and socio/economic considerations. The Plan's outcomes represent standards of environmental protection that will be achieved for MNES under the Plan in accordance with the requirements of the EPBC Act. The Plan's objectives and outcomes will be achieved through the delivery of a set of commitments and measures. The outcomes, commitments and measures were developed through an 'outcomes framework' based on program logic principles (see Section 3.2).

The outcomes and commitments are set out in the Plan. Once the Plan is endorsed under Part 10 of the EPBC Act, changes to the Plan can only be made with endorsement from the Minister in accordance with Part 10, Subdivision BA of the EPBC Act. However, the measures to implement the commitments may be updated from time to time over the life of the Plan through an adaptive management process in accordance with the Plan's monitoring, evaluation, reporting and improvement (MERI) framework (see Section 7.5). The measures are set out in the Commitments and Measures document, including the following details for each:

- Responsibility
- Key support partner/s (if relevant)
- Timing

Additionally, the BCS identifies a further broad objective focused on state and local biodiversity, and subsequent state level outcomes, commitments and measures. Some of the Plan's outcomes are also relevant to the BCS. The commitments and measures for the BCS are also detailed in the Commitments and Measures document.

Key performance indicators (KPIs) have also been established for each outcome and commitment in the Plan and BCS. The KPIs are provided in the Commitments and Measures document and may be updated over the life of the Plan through the adaptive management process under the Plan's MERI framework.

BIODIVERSITY CONSERVATION STRATEGY

The BCS satisfies the delivery of two key actions (Action N1.3.1 and W1.3.1) of the Framework Plan for the protection of biodiversity in the Growth Areas. The Framework Plan says an "overarching biodiversity conservation strategy will be prepared for the growth area[s] that provides high level guidance for the management of nationally and state significant biodiversity values. The strategy will spatially identify how outcomes for matters of national environmental significance will be delivered…" (The City of Greater Geelong, 2021).

The purpose of the BCS is to:

- Identify the national, state and local biodiversity values that are present in the Strategic Assessment Area and set out a conservation program for providing genuine, long-term positive results for those biodiversity values

- Set out how the conservation elements of the EPBC Plan for the Strategic Assessment Area will be implemented including through avoiding and minimising, mitigating, and offsetting residual impacts in accordance with the mitigation hierarchy (DSEWPC, 2012a; DELWP, 2017c)
- Guide the preparation of Precinct Structure Plans (PSPs) and subsequent development within the Strategic Assessment Area to ensure the outcomes are consistent with State biodiversity policy

Funding Program

The Plan includes a funding framework that will ensure the Plan is adequately funded throughout its life. The funding framework is described in Section 7.4 of the Plan. The detailed measures that describe how the commitment for funding in the Plan will be implemented are provided in the Commitments and Measures document.

The City has prepared a Funding Program (consistent with the Funding Framework described in Section 7.4.3) to implement the Plan. The Funding Program will be implemented into the Greater Geelong Planning Scheme by inclusion as a mandatory requirement in the urban growth zone. All proponents undertaking development will need to fulfil the requirements of the EPBC Plan and funding contribution.

The key commitments that will require funding are those that relate to:

- Offset establishment, management, monitoring and audit
- Securing and managing the Northern and Eastern Conservation Areas in the NGGA, and Cowies Creek Conservation Area in the WGGA
- Implementing conservation measures
- Implementing the MERI framework and compliance framework

Implementation of funding for the BCS including additional state and local outcomes, commitments and measures are also described in the Funding Program.

Strategic Assessment Report

A Strategic Assessment Report (SAR) has been prepared to assess the impacts of the development under the Plan on MNES. The SAR also evaluates the adequacy of the Plan's outcomes, commitments and measures in protecting MNES over the life of the Plan.

The SAR has been prepared in accordance with the Commonwealth Terms of Reference (ToR) for the strategic assessment provided under the Strategic Assessment Agreement.

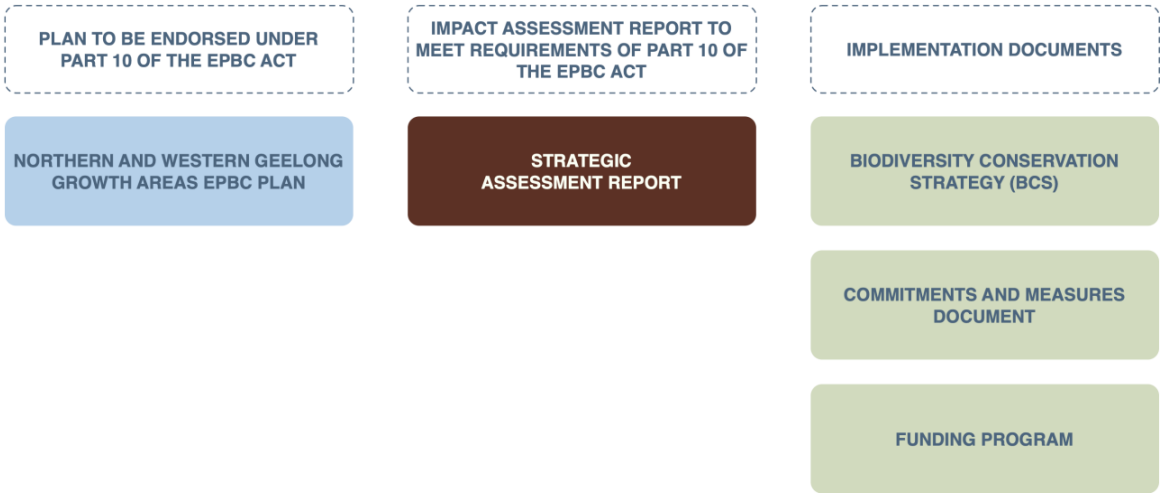


Figure 1-1: Strategic assessment documents

1.4 AREA COVERED BY THE PLAN

The area covered by the Plan is known as the Strategic Assessment Area and is shown in Figure 1-2**.** It covers 7,101 ha within the Victorian Volcanic Plains Bioregion and includes the Northern Geelong Growth Area (NGGA) and part of the Western Geelong Growth Area (WGGA) which are identified in the Framework Plan.

The Strategic Assessment Area includes (see Figure 1-3):

- The entire NGGA as described in the Framework Plan which occurs in the Lovely Banks locality and covers 2,107 ha. The NGGA includes three precincts (Elcho Road West, Elcho Road East, and Heales Road East)
- The two northern precincts (Creamery Road and Batesford North) within the WGGA which covers 769 ha and occurs in the Bell Post Hill/Batesford localities
- Indicative locations for infrastructure external to the Growth Areas, which are required to deliver the development objectives of the Framework Plan

The remaining precincts of the WGGA identified in the Framework Plan cover approximately 2,472 ha and have been excluded from the strategic assessment due to a lack of information and resolution relating to a range of factors needed to support and rationalise a full assessment and approval under the EPBC Act. This includes the anticipated development demand and timing, and the detailed plans for decommission and rehabilitation of the active Batesford Quarry.

The Growth Areas and the majority of the Strategic Assessment Area occur within the boundaries of the City of Greater Geelong LGA (see Figure 1-4). A small portion of the Strategic Assessment Area (to the west of WGGA) extends into the neighbouring Golden Plains Shire LGA. However, no actions are proposed within this location.

Section 4 describes the development under the Plan, including the external infrastructure projects.

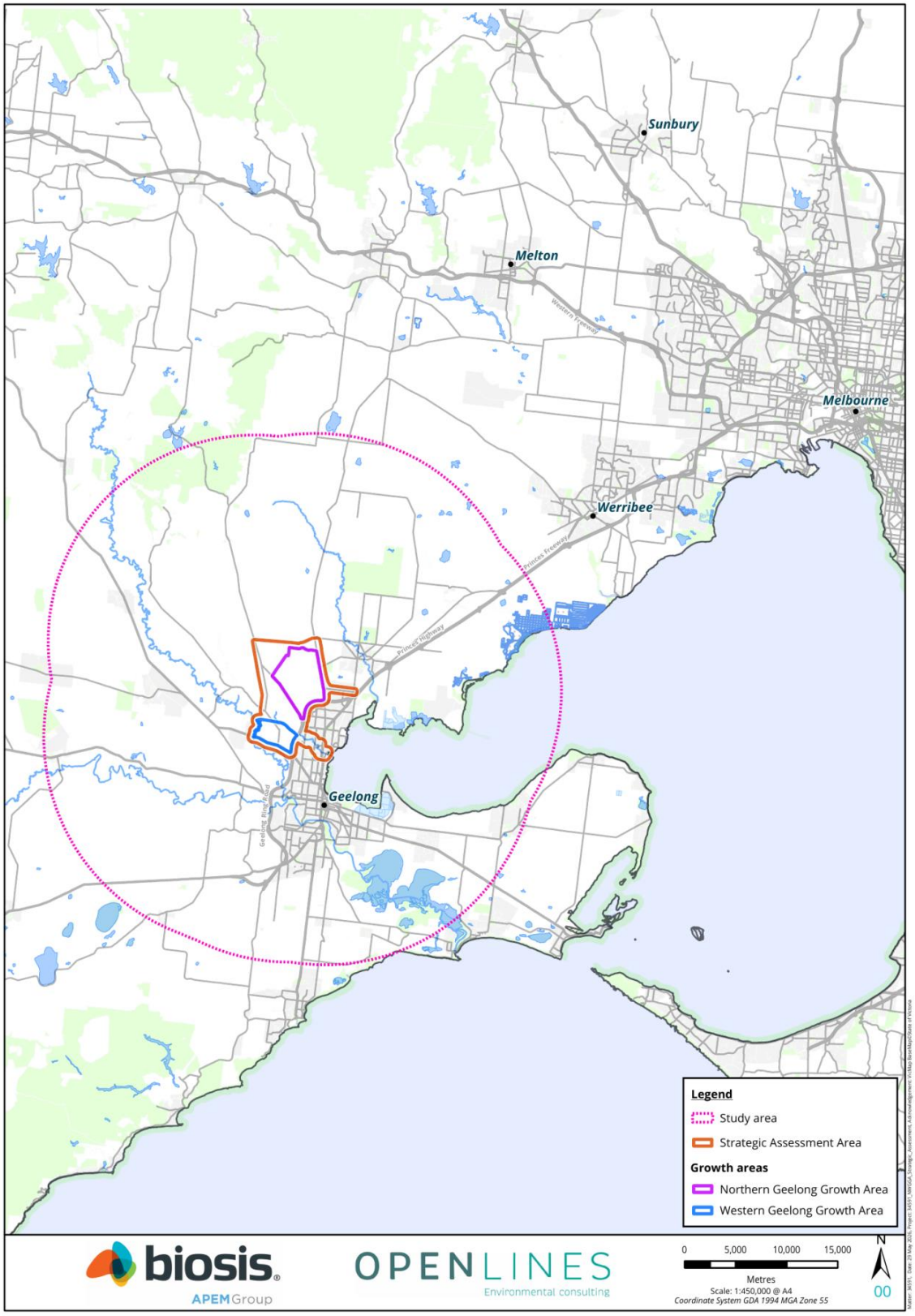


Figure 1-2: Location of the Strategic Assessment Area and Growth Areas

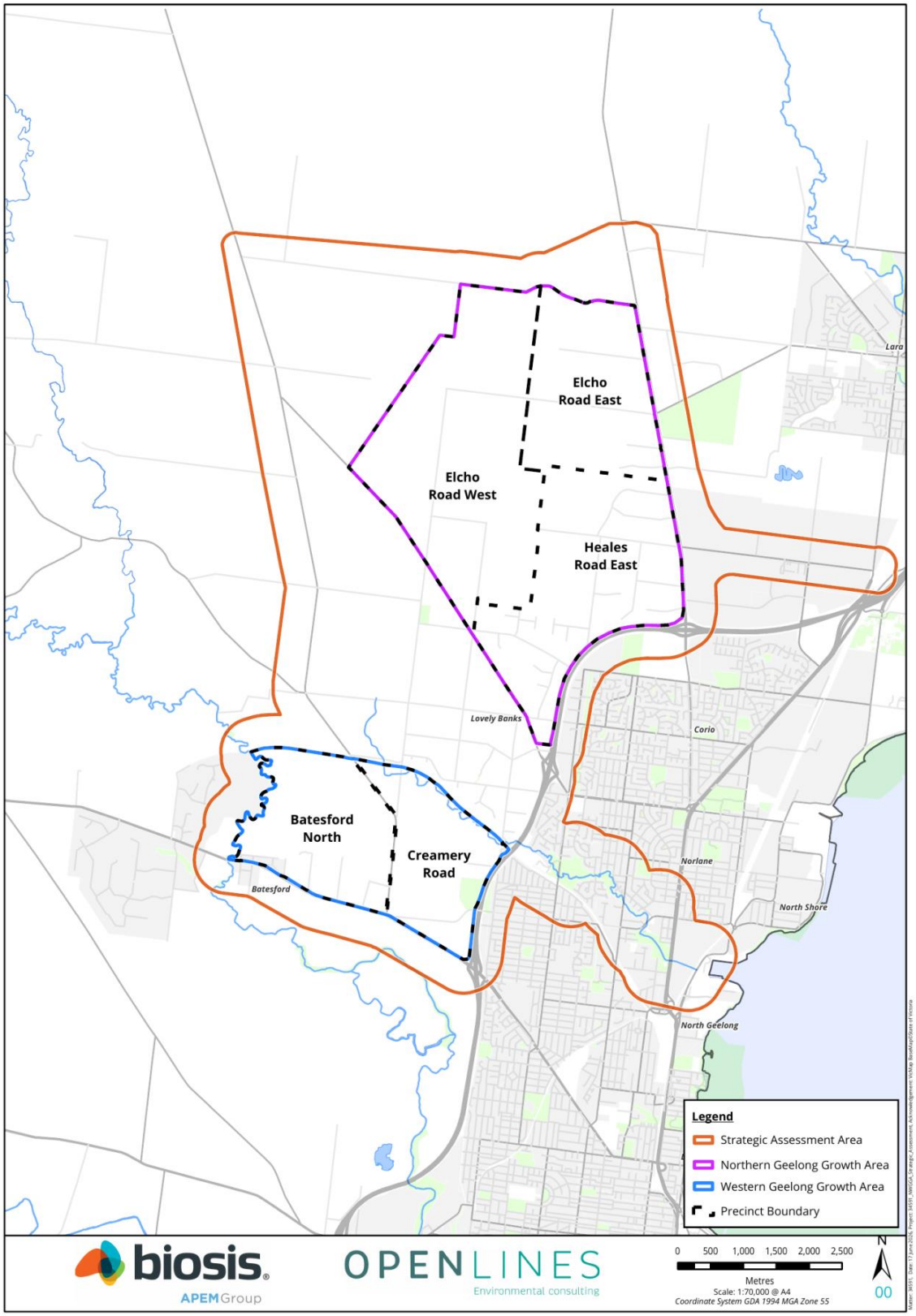


Figure 1-3: Precincts within the Strategic Assessment Area

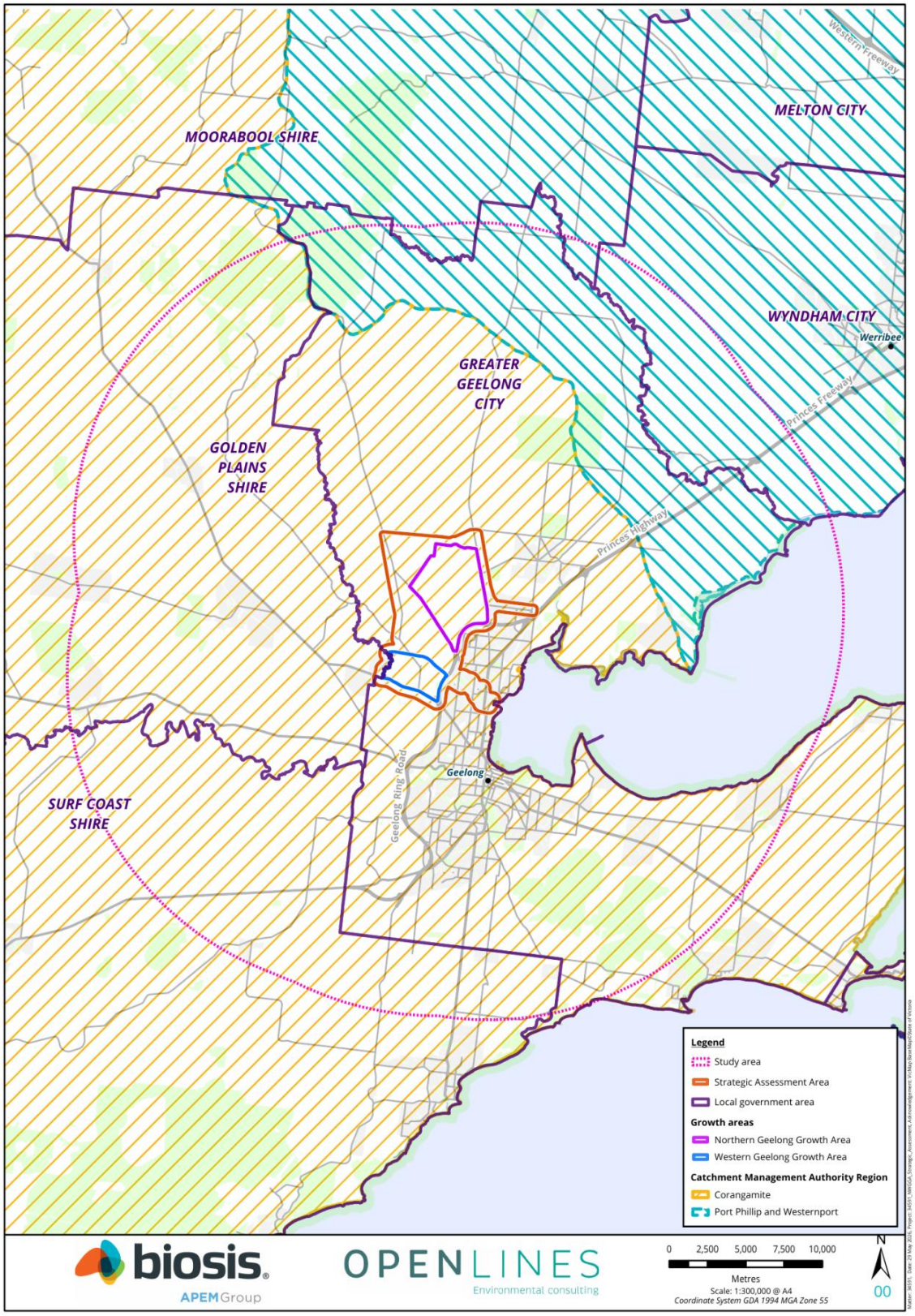


Figure 1-4: Administrative context of the Study Area, Strategic Assessment Area and Growth Areas

1.5 TIMING FOR IMPLEMENTATION OF THE PLAN

Implementation of the Plan will commence at the point that the Plan is endorsed, one or more of the classes of action has been approved, and the first Precinct Structure Plan (PSP) has been gazetted. Timing of delivery of commitments that apply to a specific Growth Area (NGGA or WGGA) will be relative to the gazettal of the first PSP in the relevant growth area.

Implementation will occur for a period of 30 years. This timing is consistent with the implementation of development under the *Northern and Western Geelong Growth Areas Framework Plan* (The City of Greater Geelong, 2021) to 2047 and allows additional time to complete the implementation of the commitments under this Plan.

1.6 REGULATORY CONTEXT AND LEGAL EFFECT OF THE PLAN

The Plan has been prepared to meet the requirements of the EPBC Act. Following endorsement and associated approvals under the EPBC Act, the Plan enables the development that is described in Chapter 4 to proceed without the need for further assessment and approval for impacts on protected matters under the EPBC Act.

The Plan does not address Victorian planning, biodiversity or other regulatory requirements. Separate approvals are needed in accordance with State regulatory requirements before the development under the Plan can proceed.

Given the long timeframe of the Plan, the titles of Ministers, government agencies, other organisations, government programs, and legislation that are referred to throughout the document may change throughout implementation of the Plan. The Plan will not be regularly updated once approved to reflect changes like this, and therefore these changes will not be directly reflected in the Plan. However, any changes should be considered current and applicable to the Plan as appropriate throughout implementation.

1.6.1 ENVIRONMENT PROTECTION AND BIODIVERSITY CONSERVATION ACT 1999

The EPBC Act is Australia's key piece of legislation to protect and manage Australia's nationally and internationally important biodiversity, environment and heritage. The objectives of the EPBC Act include:

- Providing for the protection of the environment (specifically MNES)
- Promoting Ecologically Sustainable Development (ESD) through the sustainable use of natural resources
- Promoting the conservation of Australian biodiversity and heritage
- Promoting a cooperative approach to the protection and management of the environment
- Assisting in the cooperative implementation of Australia's international responsibilities
- Recognising and promoting the role and knowledge of Indigenous people in the conservation and ecologically sustainable use of Australia's biodiversity

Under Part 10 of the EPBC Act, the Commonwealth Minister for the Environment (the Minister) can agree to undertake a strategic assessment of the impacts of a policy, plan or program on matters protected under the EPBC Act.

The Strategic Assessment Agreement was signed by the City of Greater Geelong and the Minister on 27 January 2022. The Agreement includes Terms of Reference (ToR) to guide the preparation of the SAR, as well as a set of Endorsement Criteria to ensure the Plan meets the requirements of the EPBC Act and is able to be adequately implemented. The ToR outline what the SAR must contain to allow the Minister to endorse the Plan.

The Strategic Assessment Agreement, SAR and Plan must all be publicly exhibited, and any public submissions need to be considered to finalise the documentation. The Agreement provides that, in determining whether to endorse the Plan, the Minister will consider the Plan against the Endorsement Criteria in the agreement to ensure the Plan meets the requirements of the EPBC Act and is able to be adequately implemented.

Following endorsement of the Plan, the Minister may approve the taking of actions in accordance with the endorsed Plan subject to a range of general considerations (s146F) and constraints on decision making (s146G-M), including to not act inconsistently with a recovery plan or threat abatement plan for a protected matter (s146K).

Actions undertaken in accordance with Plan endorsed by the Minister do not require further assessment and approval for impacts on protected matters under the EPBC Act. The Minister may endorse a Plan if satisfied that the SAR adequately addresses the impacts on protected matters (s146(2)(f)) and that any recommended modifications to the Plan by the Minister have been made (s146(2f(ii))).

1.6.2 OTHER APPROVALS REQUIRED FOR THE PROPOSED DEVELOPMENT

A range of separate planning, biodiversity and other approvals may be needed in accordance with State regulatory requirements before the development under the Plan can proceed. These include:

- Aboriginal cultural heritage approvals under the *Aboriginal Heritage Act 2006*
- Non-Aboriginal heritage approvals under the *Heritage Act 2017*
- Planning approvals under the *Planning and Environment Act 1987*
- Pollution and waste approvals under the *Environment Protection Act 2017*
- Protected flora species approvals under the *Flora and Fauna Guarantee Act 1988*
- Protection, management, and use of wildlife under the *Wildlife Act 1975*
- Water and waterway related approvals under the *Water Act 1989*

1.7 RESPONSIBILITIES FOR IMPLEMENTING THE PLAN

The Plan includes a governance framework that includes roles and responsibilities for implementing the Plan. The governance framework is set out in Section 7.3.

1.7.1 APPROVAL HOLDER

The City of Greater Geelong will be the approval holder for the Plan. As approval holder, the City has primary responsibility for implementing the Plan and ensuring the Plan's outcomes are achieved and its commitments are delivered.

The City is also responsible for ensuring third-parties who undertake an approved action under the endorsed Plan take these actions in accordance with the requirements of the Plan.

Further details of the roles and responsibilities of the approval holder are set out in Section 7.3.

2 Context for developing the Plan

This section outlines the environmental, social and economic context for the development of the Plan and how the Plan helps address biodiversity challenges and supports social and economic opportunities and growth. It also sets out the context for the Plan including the Victorian planning system and the social, economic and biodiversity values of the Strategic Assessment Area and surrounding region.

2.1 BIODIVERSITY VALUES AND CHALLENGES

The Greater Geelong area supports a range of biodiversity values. The following sections provide an overview of the biodiversity values of the Strategic Assessment Area and the challenges to biodiversity conservation in the region.

2.1.1 BIOREGIONAL CONTEXT

The area covered by the Plan is wholly contained within the Southern Volcanic Plain IBRA bioregion. This bioregion is characterised by broad basaltic plains, interspersed with areas of lakes and swamps. Native grasslands occur in areas where basalts are older and more weathered to produce heavy clays which are generally fertile yet poorly drained. Younger occurrences of relatively unweathered lava flows occur as stony rises, and support thin soils and woodland vegetation (Dahlhaus *et al.*, 2003; Williams, 2022).

Large areas of grasslands and woodland in the bioregion, including the Growth Areas, have been removed or degraded primarily for agricultural activities (DSE, 2003; EHP, 2021). The Growth Areas currently do not contain any State protected areas or National Parks. However, several reserves are managed by the City. Other native vegetation also remains in areas not subject to historical clearing and within riparian corridors. Native vegetation that remains on agricultural land is typically highly modified and degraded, providing relatively low biodiversity value (EHP, 2021).

2.1.2 BIODIVERSITY VALUES

The Strategic Assessment Area supports a variety of biodiversity values, both within the Strategic Assessment Area itself, and in the surrounding landscape through waterways, connected vegetation and movement of fauna.

These biodiversity values include (EHP, 2021):

- A variety of grassland and woodland vegetation communities which include the Critically Endangered EPBC listed threatened ecological community (TEC) Natural Temperate Grassland of the Victorian Volcanic Plain
- Potential habitat for numerous Commonwealth listed species, as well as known populations of the following MNES:
  - *Lachnagrostis adamsonii* (Adamson's Blown-grass) – listed as Endangered
  - *Delma impar* (Striped Legless Lizard) – listed as Vulnerable
  - *Synemon plana* (Golden Sun Moth) – listed as Vulnerable
  - *Ranoidea raniformis* (Growling Grass Frog) – listed as Vulnerable
- Three hydrological catchments (Moorabool River, Hovells Creek and Cowies Creek) that support rivers, waterways and aquatic and riparian ecosystems including the Port Phillip Bay (Western Shoreline) & Bellarine Peninsula Ramsar site

Protected matters relevant to the Plan are set out in Section 5.3.

2.1.3 BIODIVERSITY CHALLENGES

The biodiversity of the region is subject to several threatening processes that present a challenge when planning for development within the Strategic Assessment Area. Most native vegetation has been cleared or modified within the region for agricultural activities and more recently urban development. The disconnected and modified nature of the remaining native vegetation also exacerbates the impact of other threatening processes (DSE, 2003; EHP, 2021).

The following threatening processes are impacting biodiversity values within the Strategic Assessment Area and surrounding landscape:

- Habitat loss and fragmentation – given the large amount of historical clearing, protecting and/or restoring remaining areas of native vegetation is important for any future conservation efforts (DSE, 2003)
- Invasive weeds – the Growth Areas contain a high density of weeds and introduced pasture which pose a threat to multiple threatened species either through habitat competition or habitat degradation (DELWP, 2020; EHP, 2021)
- Pest animals – pests including rabbits, hares and foxes are present within the region and pose a threat to multiple threatened species, either through predation, competition or habitat degradation (DELWP, 2020; EHP, 2021)
- Water system modification – all the major watercourses within the Geelong region have experienced environmental impacts from development. These impacts include barriers to movement, changes to hydrological flows, decreased water quality, erosion and degradation of riparian vegetation (Corangamite CMA, 2014; DELWP, 2021)
- Recreational disturbance – recreational activities in estuarine and coastal environments can impact these environments, particularly waterbirds and migratory birds which occur in coastal environments and within the Port Phillip Bay (Western Shoreline) & Bellarine Peninsula Ramsar site (DELWP, 2020)
- Climate change – impacts of climate change are likely to increase in the future, affecting biodiversity through processes such as more intense and longer bushfire seasons and increased drought and flooding (DELWP, 2019)

The development supported by the Plan has the potential to exacerbate existing threats and introduce new threats to the Strategic Assessment Area and surrounding landscape. The Plan includes conservation outcomes and commitments which will help protect MNES and achieve benefits to biodiversity in the region (see Section 5).

2.2 SOCIAL AND ECONOMIC CONTEXT

The Plan supports delivery of urban growth described in the Framework Plan. This development will address a range of planning challenges associated with Geelong's social and economic growth. The following sections outline the social and economic values and context for the Growth Areas, described in detail in the Framework Plan.

2.2.1 INDIGENOUS HERITAGE

Geelong is located on the traditional lands of the Wadawurrung people, which extends from the Great Dividing Range in the north to the coast around Port Phillip Bay. The Traditional Owners are represented by the Wadawurrung Traditional Owners Aboriginal Corporation (Wadawurrung) (The City of Greater Geelong, 2021).

The Wadawurrung people have inhabited the Geelong locality for over 25,000 years (Wathaurong Aboriginal Co-operative, 2021). The Framework Plan states that the cultural, social, environmental, economic and spiritual contribution of the Wadawurrung people is an integral part of Geelong's identity.

The Growth Areas contain landscapes and waterbodies that are highly significant to the Wadawurrung people, including the waters of the Moorabool River, Barwon River and Cowies Creek. The Growth Areas also contain several registered Aboriginal places. There has only been limited archaeological investigation within the Growth Areas and a large number of additional sites of significance for Aboriginal people potentially occur in these areas (The City of Greater Geelong, 2021). Under the Framework Plan, the City aims to recognise and protect these sites and work in partnership with the Wadawurrung people to interpret and manage these sites.

2.2.2 POST CONTACT HERITAGE

The Geelong area has a rich history of early settlement which primarily consisted of pastoral activities, followed by freehold agricultural enterprises as the population increased. There are a number of registered heritage places including pastoral estates, quarries, railways and townships (The City of Greater Geelong, 2021). The Framework Plan aims to retain post-contact heritage sites and values and integrate them into the urban landscape of the Growth Areas.

2.2.3 CURRENT LAND USE

Since European settlement, large areas of grasslands and woodland have been removed or modified for agricultural activities in the Geelong area. Currently, the Growth Areas primarily consist of land that has been developed for agricultural purposes. The NGGA is primarily used for pastoral and cropping activities associated with rural residential housing while the WGGA comprises of a mix of existing land uses, including agriculture, recreation reserves, rural and medium density housing, and educational facilities (The City of Greater Geelong, 2021). While the Growth Areas do not

contain any State protected areas or National Parks, there are a number of reserves managed by the City in the WGGA – including the Moorabool River Reserve (EHP, 2021).

2.2.4 GEELONG'S GROWTH

Geelong is considered to be the primary population centre outside of Melbourne and contains numerous assets that are vital for the State's social, economic and environmental sustainability (Victoria State Government, 2017). It is the largest regional city in Victoria, with a current population of approximately 317,857 people (ABS, 2020). The city is projected to exceed a population of 500,000 by 2050 with an anticipated, sustained annual growth rate of 2.5 per cent (The City of Greater Geelong, 2021). This projected growth is driven by a strong economy and employment growth that is expected to continue in the coming decades (Geelong Region Alliance, 2007; The City of Greater Geelong, 2021).

GREATER GEELONG SETTLEMENT STRATEGY

The growth of Geelong has long been recognised. To manage the long term growth of the city and provide for the region's housing needs the City of Greater Geelong prepared the Greater Geelong Settlement Strategy 2020 (The City of Greater Geelong, 2021). The strategy directs future housing growth to urban Geelong. This includes a target of 50 per cent of housing growth occurring in established areas and 50 per cent accommodated in three major growth areas – Armstrong Creek, the NGGA, and the WGGA.

The G21 Regional Growth Plan (Geelong Region Alliance, 2013) first identified the Northern and Western Geelong Growth Areas as potential growth areas for 'further investigation' in 2013. The Northern and Western Geelong Growth Areas and Greater Geelong Settlement Strategy provides a program and process for managing the release of precinct structure plan areas to ensure that Geelong's housing needs are met, and the necessary supporting infrastructure and sequencing of development is considered.

2.2.5 SOCIAL AND ECONOMIC VALUE OF THE PLAN

The development supported by this Plan will facilitate substantial social and economic opportunities and growth that will generate many jobs and boost the economy, including in relation to:

- Housing and accommodation
- Employment
- Community
- Transport

HOUSING AND ACCOMMODATION

The development supported by the Plan aims to provide a sustainable and diverse mix of housing and accommodation to support future residents and visitors of Geelong. Diverse housing is important for the success of new urban areas, as it attracts a range of potential residents at all stages of their life. The City intends to provide a mix of low-rise, multi-unit and clustered housing types, along with aged-care and affordable, community and social housing options (The City of Greater Geelong, 2021).

The Growth Areas identified in the Framework Plan have the capacity to accommodate 110,000 new residents. In addition to residential housing, a range of other accommodation types may also be provided including hotels, motels and caravan and camping parks. Existing rural living spaces will also be retained in some areas, providing opportunities for agriculture and rural industry (The City of Greater Geelong, 2021).

EMPLOYMENT

Development will also generate substantial business opportunities and create jobs across a range of employment types including commercial business, industry, education, health care, transport and agriculture. Additionally, the construction phases of development will generate many jobs that will be sustained over the coming decades as each precinct is released and developed (The City of Greater Geelong, 2021).

The Growth Areas are also near the Geelong Ring Road Employment Precinct, Port of Geelong, Avalon Airport and Melbourne, which will facilitate further employment opportunities and growth (The City of Greater Geelong, 2021).

COMMUNITY

The development supported by the Plan will facilitate the delivery of community infrastructure including libraries, art and cultural centres, sports facilities and function spaces. This infrastructure will provide both social and economic value to the Growth Areas as well as Greater Geelong (The City of Greater Geelong, 2021).

Amenity is a key factor for attracting new residents and businesses, as well as facilitating future investment opportunities and tourism. Community open spaces, including recreation reserves and local parks, will be integrated into the layout of the development areas, providing residents and visitors with access to these spaces and adding aesthetic appeal (The City of Greater Geelong, 2021).

Existing heritage sites will also be protected and integrated into the Growth Areas, providing the community with a sense of place. Tree canopy cover will be maximised to reduce urban heat and provide potential habitat for fauna, while also increasing amenity for the community (The City of Greater Geelong, 2021).

TRANSPORT

The Plan also covers development of public and private transport networks and corridors which will allow residents and visitors to easily travel to and from the Growth Areas, as well as access facilities within the Growth Areas. Linkages and access points will be established to existing transport corridors such as the Geelong Ring Road to maximise use of existing transport infrastructure (The City of Greater Geelong, 2021).

Public transport including buses and rail will be prioritised within the Growth Areas to help promote more sustainable transport options. Additionally, open spaces within the Growth Areas will be maximised to allow for shared pathways that will facilitate sustainable transport linkages, such as via walking and cycling, throughout the Growth Areas (The City of Greater Geelong, 2021).

2.3 PLANNING CONTEXT

The Victorian planning system under the *Planning and Environment Act 1987* (P&E Act) is the key delivery framework for development within the Growth Areas and the implementation of the BCS.

The Victorian planning system hierarchy provides a framework for decision-making for the use and development of land in greenfield areas. The hierarchy relevant to the Growth Areas includes:

- The Planning Policy Framework
- *Northern and Western Geelong Growth Area Framework Plan* (the Framework Plan)
- Greater Geelong Planning Scheme and Urban Growth Zone (UGZ)
- Precinct Structure Plans (PSPs)
- Planning permits

2.3.1 PLANNING POLICY FRAMEWORK

The Planning Policy Framework (PPF) is the policy content of planning schemes and provides overarching policy to guide land use, subdivision and development in Victoria. The PPF is informed by Victorian government policy.

The PPF includes planning policies under three tiers:

- State-wide – policies of state significance that apply in all planning schemes in Victoria
- Regional – policies of state significance that apply to allied planning schemes based on geographic groupings
- Local – policies of local significance that apply to an individual local planning scheme

Several policies under the PPF are relevant to the protection of MNES and biodiversity values, including:

- Clause 12.01 – aims to protect and enhance Victoria's biodiversity
- Clause 12.03 – aims to protect and enhance river corridors, waterways, and wetlands
- Clause 13.02 – aims to manage fire risks without unacceptable impacts to biodiversity
- Clause 13.04 – aims to manage soil degradation and contaminated land

- Clause 14.02 – aims to protect water quality
- Clause 19.03 – aims to sustainably manage water through integrated water management

The PPF will be given effect in the Growth Areas through the development of PSPs, planning permits, and other decision-making related to the Growth Areas. A planning authority must take into account the PPF when preparing an amendment to a planning scheme. A responsible authority must take into account and give effect to the PPF when it makes a decision under the planning scheme, such as a decision to grant a permit for use or development.

2.3.2 FRAMEWORK PLAN

The Framework Plan (The City of Greater Geelong, 2021) was prepared as part of the City's plan to address the long-term growth in Geelong. The plan describes the existing site context of the Growth Areas and sets out:

- Broad future urban structure of the Growth Areas, including potential areas suitable for environmental protection
- Vision and set of urban development objectives for each Growth Area
- A set of actions to be implemented through future planning processes

The overarching vision of the Framework Plan is:

> *"By 2047, Greater Geelong will be internationally recognised as a clever and creative city-region that is forward looking, enterprising and adaptive, and cares for its people and environment"*

The biodiversity-related urban development objectives of the Framework Plan for each Growth Area are:

> *"Protect and regenerate biodiversity and cultural heritage values of the natural and constructed waterways along the Lovely Banks monocline and heritage values of the Elcho Homestead"*

> *"Protect and regenerate biodiversity and cultural heritage values along the Barwon and Moorabool Rivers, Cowies Creek and the Dog Rocks Sanctuary and establish vegetated constructed waterways"*

The Framework Plan will inform the subsequent preparation of more detailed PSPs. The Framework Plan is incorporated into the Greater Geelong Planning Scheme at Clause 11.02.

2.3.3 GREATER GEELONG PLANNING SCHEME AND URBAN GROWTH ZONE

The Greater Geelong Planning Scheme sets out objectives, strategies and policy for the use, development and protection of land in the City of Greater Geelong, including the Growth Areas.

The planning scheme includes the PPF and applies a zone (the UGZ) to land within the Growth Areas.

A key purpose of the UGZ is to manage the transition of non-urban land identified for urban growth into urban land.

Within the UGZ, a PSP must be prepared before non-urban land can be converted into urban land. The UGZ allows detailed planning requirements for the precinct to be specified in schedules to the zone to ensure development proceeds generally in accordance with the PSP. The schedules incorporate the future structure plan of each PSP and allow:

- Zones to be applied to the land consistent with the urban structure in the PSP and/or specific provisions as an alternative to zones or alongside zones that control land-uses and development
- Requirements for permit applications for subdivision and development
- Conditions or requirements that must be included on a permit
- Decision guidelines that must be considered in granting a permit

2.3.4 PRECINCT STRUCTURE PLANS AND NATIVE VEGETATION PRECINCT PLANS

PRECINCT STRUCTURE PLANS

PSPs are high-level strategic plans that set out the preferred spatial location of land uses and infrastructure within each precinct, including details of the future urban structure of the precinct. This helps to stage development within an area and guide provision of subdivision permits, building permits and infrastructure delivery. Although PSPs provide a level of certainty for development, they are intended to be flexible to allow for site specific considerations.

The City will prepare PSPs for each of the nine precincts within the Growth Areas in accordance with the strategies in Clause 11.02-2L 'Northern and Western Geelong Growth Areas' of the Greater Geelong Planning Scheme. These strategies require the development to be generally in accordance with the Framework Plan map and sequenced generally in accordance with the Development Sequencing maps that form part of the clause. PSPs will also consider the *Precinct Structure Planning Guidelines: New Communities in Victoria* (Victorian Planning Authority, 2021).

PSPs will be prepared over approximately 10 to 15 years. Each PSP will be a self-contained project and will be incorporated into the planning scheme via a planning scheme amendment process.

The PSP process involves several key steps, including:

- Early consultation with stakeholders to develop a vision for the precinct
- Preparation of technical studies and reports to understand key issues and constraints for the precinct, and to inform planning and management responses to be addressed in the PSP
- An opportunity for stakeholders to raise concerns and make submissions through public exhibition
- An independent planning panel hearing to consider and resolve key technical, planning and stakeholder issues
- Approval of the PSP and incorporation into the Greater Geelong Planning Scheme through a planning scheme amendment

PSPs include requirements and guidelines for the development of the precinct and are implemented primarily through planning permits. They inform the preparation and assessment of permit applications and the conditions that may be placed on planning permits.

Once a PSP has been incorporated into the planning scheme by a planning scheme amendment, planning permits can be granted by the responsible authority for urban development as set out in the UGZ.

NATIVE VEGETATION PRECINCT PLANS

A permit is usually required to remove native vegetation in Victoria. Removal of native vegetation is regulated through clause 52.16 'Native Vegetation Precinct Plan' and clause 52.17 'Native vegetation' of planning schemes.

NVPPs will be used to assess and manage the impacts of native vegetation removal in the Growth Areas. They provide for the strategic management of native vegetation within a precinct. NVPPs identify the native vegetation to be retained and that can be removed, and the offset requirements for the vegetation to be removed. NVPPs switch off the need for a permit to remove native vegetation where removal is in accordance with an NVPP.

NVPPs will be prepared for each precinct within the Growth Areas containing native vegetation in conjunction with the preparation of PSPs and will be incorporated in the schedule to Clause 52.16 via a planning scheme amendment.

The purpose of an NVPP is to ensure no net loss to biodiversity because of the removal of native vegetation. This is to be achieved by applying the three-step approach in the Native Vegetation Guidelines (DELWP, 2017c), which is:

- Avoid the removal of native vegetation
- Minimise impacts from the removal of native vegetation that cannot be avoided
- Provide an offset to compensate for the impact of the removal of native vegetation

NVPPs must be prepared in accordance with Clause 52.16, including the *Guidelines for the removal, destruction or lopping of native vegetation* (DELWP, 2017c) and in consideration of the Greater Geelong Planning Scheme, including:

- Planning Policy Framework Clause 12.01-1S – 'Protection of biodiversity'
- Other relevant plans, strategies or policies that are incorporated in the Greater Geelong Planning Scheme, including the Framework Plan and any relevant PSP

The preparation of an NVPP requires an assessment of the importance of the native vegetation for biodiversity, land and water protection, landscape and cultural values. This is documented in a site assessment report.

2.3.5 PLANNING PERMITS

Responsible authorities approve planning permits for subdivision and development that are consistent with the Greater Geelong Planning Scheme and generally in accordance with the relevant PSP that applies to the land.

The permit application process involves several key steps, including:

- Preparation of technical studies and reports that support the application and inform the planning decision, including plans to address the potential impacts of the development
- Referral of the application to specialist referral authorities for advice and comment where required – these may object to the permit or specify conditions to be included on a permit to address potential impacts
- An opportunity for stakeholders to raise concerns and make submissions through a notification process
- Inclusion of conditions on permits to address the potential impacts of the development
- An opportunity to review the merits of a permit decision at the Victorian Civil and Administrative Tribunal

The UGZ requires that, before deciding on an application for subdivision or development the responsible authority must consider, in addition to a general set of decision guidelines in Clause 65:

- The Municipal Planning Strategy and the Planning Policy Framework
- Any relevant Growth Area framework plan, such as the Framework Plan
- Any PSP applying to the land, including the vision and objectives of the plan

Furthermore, permits granted for subdivision or development must:

- Be generally in accordance with the PSP
- Include any conditions or requirements specified in the schedule to the Urban Growth Zone or the PSP

2.3.6 IMPLEMENTATION OF THE PLAN THROUGH THE PLANNING SYSTEM HIERARCHY

Table 2-1 summarises how each part of the planning system hierarchy is proposed to be used to implement the Plan.

Table 2-1: Summary of how each part of the planning system hierarchy will be used to implement the Plan

Part of planning system hierarchy	Summary of implementation approach	Implementation mechanism
PPF	The PPF will be given effect in the Growth Areas through the development of PSPs, planning permits, and other decision-making related to development. A planning authority must take into account the PPF when preparing an amendment to a planning scheme and a responsible authority must take into account and give effect to the PPF when it makes a decision under the planning scheme, such as a decision to grant a permit	PSPs, planning permits
Framework Plan	The Framework Plan will inform the subsequent preparation of more detailed PSPs to be prepared for each precinct within the Growth Areas Policy will be introduced into the Greater Geelong Planning Scheme to give effect to the commitments in the BCS (see Chapter 5 of the BCS)	Planning scheme amendment
Greater Geelong Planning Scheme and UGZ	Schedules to the UGZ for each precinct will apply environment zones to the strategic conservation areas (see Chapter 5) and specify requirements for permit applications, conditions to be included on permits, and decision guidelines to ensure development proceeds generally in accordance with the PSP and give effect to commitments in the Plan, where appropriate	Planning scheme amendments to incorporate schedules to the UGZ
PSPs	PSPs will be prepared for each of the precincts within the Growth Areas PSPs will identify the strategic conservation areas (see Chapter 5) as to be protected for conservation in the urban structure maps for the precinct PSPs will include requirements and guidelines for the development of the precinct to give effect to commitments in the Plan, where appropriate	Planning scheme amendments to incorporate PSPs and NVPPs into the planning scheme

Part of planning system hierarchy	Summary of implementation approach	Implementation mechanism
NVPPs	NVPPs will be prepared for each precinct containing native vegetation in conjunction with the preparation of PSPs NVPPs for precincts containing native vegetation will identify the vegetation in the strategic conservation areas (see Chapter 5) as to be retained and the remaining native vegetation as to be removed, and will specify the offsets needed to meet State biodiversity policy	
Planning permits	Planning permits will be granted generally in accordance with the PSP, and in accordance with the requirements of the relevant UGZ schedule and other requirements of the planning scheme	Planning permits

3 Objective and outcomes of the Plan

3.1 INTRODUCTION

The Plan identifies a broad objective, as well as ten outcomes relating to the protection of MNES under the EPBC Act and socio/economic considerations. The Plan's outcomes represent standards of environmental protection that will be achieved for MNES under the Plan in accordance with the requirements of the EPBC Act. The Plan's objective and outcomes will be achieved through the delivery of a set of commitments and measures.

The objective, outcomes, commitments and measures were developed through an 'outcomes framework' based on program logic principles. The outcomes framework provides a way to structure what the Plan will deliver for the conservation of protected matters in a clear and logical way. It supports accountability and transparency by providing the basis and a set of benchmarks for monitoring, reporting, and ongoing evaluation and adaptive management of the Plan.

The outcomes framework is a requirement of the Endorsement Criteria in the Strategic Assessment Agreement.

3.2 OUTCOMES FRAMEWORK

The outcomes framework is comprised of four components:

- A broad ***objective***
- ***Outcomes***
- ***Commitments*** to deliver the outcomes
- ***Measures*** to implement the commitments

The definition of each of these is provided in Table 3-1.

The logic underpinning the outcomes framework is designed to ensure that:

- The objective, outcomes, commitments and measures align so that implementing the measures and commitments is expected to lead to the outcomes and objective of the Plan being achieved
- Assumptions about the relationships between these can be identified and tested so that implementation can be adaptively improved over time where necessary under changing circumstances

3.2.1 OUTCOMES AND COMMITMENTS VERSUS MEASURES

The Plan's outcomes and commitments are set out in the Plan. Once the Plan is endorsed under Part 10 of the EPBC Act, changes to the Plan can only be made with endorsement from the Minister in accordance with Part 10, Subdivision BA of the EPBC Act (see Section 7.8.2).

The measures to implement the commitments are set out in the Commitments and Measures document and are not set out in this Plan (see Section 1.3). The measures may be updated from time to time over the life of the Plan through an adaptive management process in accordance with the Plan's MERI framework (see Section 7.5). The improvement step of the MERI framework provides the opportunity to adaptively manage implementation of the Plan to ensure the commitments are successfully delivered and the Plan's objective and outcomes are achieved.

Table 3-1: Definition of the components of the outcomes framework

Framework component	Definition
Objective	The reason the Plan is being undertaken and the broad goal it is intended to support
Outcomes	The impacts or changes to environmental and socio/economic conditions that are expected to be achieved because of the delivery of the commitments and that are needed to achieve the overall objective of the Plan
Commitments	The direct results of implementing the measures that are expected to lead to the achievement of the outcomes
Measures	The specific actions that will be undertaken to meet the commitments

3.3 OBJECTIVE OF THE PLAN

The objective of the Plan is to:

Provide for the protection of matters of national environmental significance while supporting the delivery of the Northern and Western Geelong Growth Areas Framework Plan and its objectives

3.4 OUTCOMES OF THE PLAN

The outcomes of the Plan are set out in Table 3-2. Refer to the Commitments and Measures document for an explanation and justification of each outcome.

The outcomes have been defined in a way to provide both:

- Assurance that appropriate standards of environmental protection will be met, and
- Sufficient flexibility to support the implementation of the Plan over its life in a complex and dynamic ecological, social, and economic environment

The outcomes have been developed to be:

- Specific in relation to scope and how the Plan will contribute to the outcome relative to other influences
- Measurable and able to be reported against
- Achievable within the scope of the Plan

The approval holder is responsible for tracking progress against the achievement of outcomes under the Plan's monitoring, evaluation, reporting and improvement framework and adjusting measures as necessary through adaptative management to ensure the outcomes will be achieved.

Table 3-2: Outcomes of the Plan

No.	Outcome
1	Populations of Golden Sun Moth and Striped Legless Lizard are maintained within the Northern Conservation Area
2	The extent and condition of Natural Temperate Grassland is maintained within the Eastern Conservation Area
3	Impacts to habitat for Golden Sun Moth, Striped Legless Lizard and Natural Temperate Grassland within the gully avoidance area are avoided and minimised
4	Potentially suitable habitat attributes for Victorian Grassland Earless Dragon within the Northern Conservation Area are protected and managed to support potential recovery of the species
5	Actions that support the long-term viability and recovery of the Victorian Grassland Earless Dragon are funded by the Victorian Grassland Earless Dragon Trust Fund, and are implemented
6	The long-term viability of the important population of the Growling Grass Frog along Cowies Creek is supported through the protection and enhancement of habitat
7	The establishment of offset sites outside the Growth Areas leads to the protection and management of known habitat for Natural Temperate Grassland, Golden Sun Moth and Striped Legless Lizard
8	Matters of national environmental significance associated with the Moorabool avoidance area, as well as other waterways, riparian areas and wetlands are protected from any adverse impacts of development under the Plan
9	The Plan improves regulatory efficiency by streamlining EPBC Act approvals
10	Implementation of the Plan is effective, timely, and cost efficient

3.5 COMMITMENTS

The commitments of the Plan are set out under the development, conservation, and assurance and implementation chapters in the Plan (Chapters 4, 5 and 6 respectively).

The Plan's commitments cover:

- Incorporating the Plan into the planning system hierarchy so that development occurs in accordance with the Plan
- A series of conservation commitments relating to:
  - Avoiding and minimising impacts
  - Mitigating impacts
  - Offsetting residual impacts
- A series of assurance and implementation commitments, relating to:
  - Governance
  - Funding
  - MERI
  - Compliance

The City, as approval holder, is responsible for ensuring the commitments are implemented and for monitoring and reporting on progress in delivering the commitments under the MERI framework (see Chapter 7.5).

3.6 MEASURES

Each commitment has a set of measures associated with it. The implementation of those measures is expected to deliver the commitments.

The measures set out:

- What will be done to deliver the commitment
- Responsibilities for implementation
- Any relevant key support partners for implementation
- Timing of implementation
- Where appropriate:
  - The relevant standards or methods that will be applied
  - Any conditions relating where, when and under what circumstance actions will be carried out

The City, as approval holder, is responsible for ensuring the measures are implemented and for monitoring and reporting on progress in delivering the measures under the MERI framework (see Chapter 7.5). Measures may be adjusted as necessary through adaptative management to ensure the outcomes and commitments are delivered.

The full list of the Plan's commitments and associated measures are provided in the Commitments and Measures document.

4 Development supported by the Plan

4.1 INTRODUCTION

Following endorsement and associated approvals under the EPBC Act, the Plan enables certain development to proceed without the need for further assessment and approval for impacts on protected matters under the EPBC Act.

This section describes the development that is supported by the Plan and includes details of the following:

- Where development can occur
- Development actions that are supported by the Plan
- Development that is not covered by the Plan
- Who can undertake development and their requirements
- Changes to the boundaries of the land subject to development

4.1.1 COMMITMENTS

The Plan's commitments for development are provided in Table 4-1.

The measures to implement these commitments are described in the Commitments and Measures document.

Table 4-1: Commitments for development

No.	Commitment
1	Development within the Strategic Assessment Area will proceed in accordance with any Commonwealth approval conditions and in accordance with the EPBC Plan and NWGGA Biodiversity Conservation Strategy
2	Proposed minor changes to the boundaries of land subject to development (as shown in Figure 4-1 of the Plan) will meet the eligibility for consideration and be in accordance with the process for considering changes set out in Section 4.5 of the Plan
3	Development within the portion of Heales Road East subject to process based development (as shown in Figure 4-1 of the Plan) and external infrastructure development will only proceed if undertaken in accordance with the requirements for process based development in Section 6.3 of the Plan

4.2 LOCATION OF DEVELOPMENT

Development under the Plan is only proposed to occur within specific locations in the Strategic Assessment Area (development land). This includes:

- 'Land subject to development' within the Growth Areas. This land covers 2,596.8 ha across the Growth Areas and is shown in Figure 4-1. Development within this land is proposed for all classes of actions (see Section 4.3). Development within parts of the Heales Road East precinct (which form part of the 'land subject to development') is subject to a specific process, described further in Chapter 6
- The 'Northern Conservation Area' and 'Eastern Conservation Area' within the avoided land in the NGGA (see Figure 4-1). See Section 5.4 for details of these conservation areas. Development within these areas is restricted to the environmental management class of actions (see Section 4.3.5)
- The 'Cowies Creek Conservation Area', 'Moorabool River corridor' and 'Moorabool avoidance area' within the avoided land in the WGGA, and the 'gully avoidance area' within the avoided land in the NGGA (see Figure 4-1). See Section 5.4 for details of these areas. Development within these areas is restricted to the environmental management class of actions and limited activities under the supporting infrastructure and services class of actions (see Sections 4.3.4 and 4.3.5)
- Some development – called 'external infrastructure development' – which may occur outside the Growth Areas within the Strategic Assessment Area. This development is limited to the supporting infrastructure and services class of actions and the environmental management class of actions (see Sections 4.3.4 and 4.3.5). The Plan shows

indicative locations where external infrastructure development is intended to occur (see Figure 4-1) and includes a set of commitments to ensure this development is located to avoid and minimise impacts to MNES

It is noted that there is a property in the WGGA which has been approved for development under Part 9 of the EPBC Act (EPBC referral number 2023/09498). This property is excluded from the strategic assessment and is identified on Figure 4-1 as 'land not subject to the EPBC Plan' (see Section 4.3.6 for details on development not covered by the EPBC Plan).

Any development associated with environmental management within the Northern Conservation Area and Eastern Conservation Area will be in accordance with the principles set out in Section 4.3.5.

Any development within the Cowies Creek Conservation Area, Moorabool River corridor, Moorabool avoidance area, and gully avoidance area will be:

- In accordance with the principles set out in Section 4.3.5 (for environmental management), and
- Limited to the minimum activities required to facilitate any actions required under the supporting infrastructure and services class of actions in accordance with the principles set out in Section 4.3.4

The delivery of development within the portion of Heales Road East identified in Figure 4-1 and external infrastructure development is described further in Chapter 6.

Although approval is being sought to develop all land subject to development, some of this land may not be developed following the PSP process that will occur during the implementation phase of the Plan. This could be due to the establishment of open space, reduced development requirements, or unforeseen development constraints.

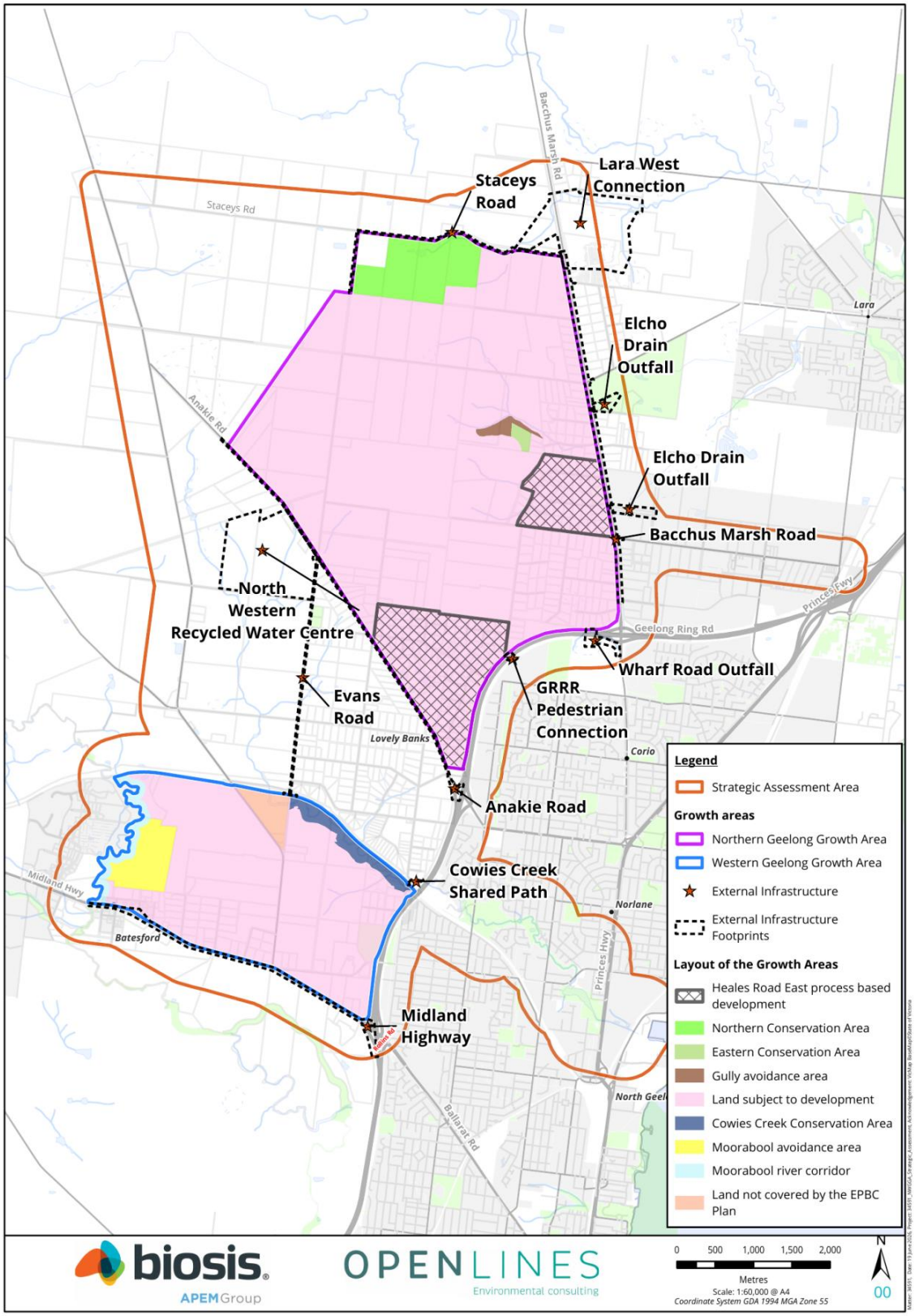


Figure 4-1: Development and conservation land within the Strategic Assessment Area

4.3 DEVELOPMENT CLASSES OF ACTIONS

Development is approved under Part 10 of the EPBC Act through 'classes of actions' that represent the scope of development that may be undertaken through the Plan. There are five classes of actions that are included in the Plan:

- Urban and commercial development
- Industrial development
- Rural development
- Supporting infrastructure and services
- Environmental management

The Minister may approve the classes of actions in accordance with the endorsed Plan. If granted, the classes of actions approval will set out what actions are approved and the conditions of approval. The intention of the strategic assessment is for the classes of actions as described in this Plan to be approved.

Each class of actions is defined below and includes a number of broad 'development types'. Specific examples of the various 'impact activities' that may be undertaken as part of each development type are also provided.

The example impact activities are intended to provide an understanding of the specific actions that are considered within the scope of each class of actions and are mostly defined as per the *Victoria Planning Provisions* (VPP). These lists are not intended to be exhaustive. Certain impact activities that are not listed may be considered within the scope of approved classes of actions where:

- The action could reasonably be considered to be part of that class of actions
- The impacts of the action are substantially the same as those listed and assessed in the Strategic Assessment Report

Certain development and actions are also considered to be out of scope for this Plan (see Section 4.3.6).

4.3.1 URBAN AND COMMERCIAL DEVELOPMENT

The urban and commercial development class of actions covers actions and activities associated with residential and commercial areas. It includes the construction, operation, maintenance, and decommissioning of the following:

- Residential buildings and accommodation
- Education centres
- Leisure and recreation premises
- Offices
- Places of assembly and public buildings
- Retail premises
- Community services

Table 4-2 sets out the development types and example impact activities that are covered by this class of actions. The impact activities are as defined in the VPP, unless subject to specific exclusions (see Section 4.3.6).

All activities under the urban and commercial development class of actions can only occur within the land subject to development.

Table 4-2: Development types and example impact activities included in urban and commercial development class of actions

Development type	Examples of specific impact activities
Residential buildings and accommodation	• Dwelling • Residential aged care facility • Group accommodation • Motel • Camping and caravan park • Display home centre

Development type	Examples of specific impact activities
Education centres	• Child care centre • Primary school • Secondary school • Tertiary institution
Leisure and recreation premises	• Indoor recreation facility • Outdoor recreation facility • Open sports ground
Offices	• Bank • Medical centre • Real estate agency • Home based business
Places of assembly and public buildings	• Cinema • Exhibition centre • Function centre • Library • Place of worship
Retail premises	• Food and drink premises • Postal agency • Landscape and gardening supplies • Market • Supermarket • Hairdresser
Community services	• Emergency services facility • Hospital • Veterinary centre • Service station

4.3.2 INDUSTRIAL DEVELOPMENT

The industrial development class of actions covers actions and activities associated with the construction and operation of facilities for industrial use. It includes the construction, operation, maintenance, and decommissioning of:

- Industry
- Warehouses
- Energy generation

Table 4-3 sets out the development types and example impact activities that are covered by this class of actions. The impact activities are as defined in the VPP, unless subject to specific exclusions (see Section 4.3.6).

All activities under the industrial development class of actions can only occur within the land subject to development.

Table 4-3: Development types and example impact activities included in industrial development class of actions

Development type	Examples of specific impact activities
Industry	• Materials recycling • Refuse disposal • Research centre • Car wash • Dry cleaner • Transfer station
Warehouses	• Fuel depot • Mail centre • Boat and caravan storage • Vehicle store
Energy generation	• Solar energy facility • Waste-to-energy facility

4.3.3 RURAL DEVELOPMENT

The rural development class of actions covers actions and activities associated with the use of rural land for agriculture and associated activities. Table 4-4 sets out the development types and example impact activities that are covered by this class of actions. The impact activities are as defined in the VPP, unless subject to exclusion (see Section 4.3.6).

All activities under the rural development class of actions can only occur within the land subject to development.

Table 4-4: Development types and example impact activities included in rural development class of actions

Development type	Examples of specific impact activities
Agriculture	• Grazing animal production • Animal training • Domestic animal husbandry • Horticulture • Market garden • Saleyard • Winery

4.3.4 SUPPORTING INFRASTRUCTURE AND SERVICES

The supporting infrastructure and services class of actions covers actions and activities that are required to facilitate and support all other types of development. This covers a wide range of activities including (but not limited to) those required for the supply of water, electricity, fuel, transport, telecommunications, the removal of waste, as well as safety interventions like erosion prevention. It includes the construction, operation, maintenance, and decommissioning of:

- Roads and transport
- Utility installation
- Supporting infrastructure

The supporting infrastructure and services class of actions will be undertaken for the activity types and associated specific activities defined in Table 4-5.

Table 4-5: Development types and example impact activities included in supporting infrastructure and services class of actions

Development type	Description or examples of specific impact activities
Roads and transport	• Roads • Railways • Tramways • Bus terminals • Car parks • Driveways
Utility installation	Includes land used: • For telecommunications • To transmit or distribute gas or oil • To transmit, distribute or store power including battery storage • To collect, treat, transmit, store or distribute water • To collect, treat, or dispose of storm or flood water, sewage, or sullage
Supporting infrastructure	• Shared paths and footpaths • Bridges • Signs • Retaining walls • Erosion mitigation

All activities under the supporting infrastructure and services class of actions can only occur within the following locations (except where this is external infrastructure development – see below):

- Land subject to development
- Cowies Creek Conservation Area (noting the limited scope of permissible activities outlined below)
- Moorabool River corridor (noting the limited scope of permissible activities outlined below)
- Moorabool avoidance area (noting the limited scope of permissible activities outlined below)
- Gully avoidance area (noting the limited scope of permissible activities outlined below)

Within the Cowies Creek Conservation Area, Moorabool River corridor, Moorabool avoidance area, and the gully avoidance area, the following impact activities are not permissible under the supporting infrastructure and services class of actions:

- All activities included within the 'Roads and transport' development type
- The following activities included within the 'Utility installation' development type:
  - Data centre
  - Telecommunications facility

Within the Cowies Creek Conservation Area, Moorabool River corridor, Moorabool avoidance area, and the gully avoidance area, development under this class of actions must be avoided unless absolutely necessary to support delivery of the Plan. If unavoidable development is required under this class of actions, it must be undertaken in accordance with the following principles and standards:

- Development does not prevent the achievement of any environmental objectives, outcomes, commitments or management actions established for the areas, including any relevant Conservation Management Plans for the area
- Development does not result in a significant impact to an MNES
- Potential indirect impacts are minimised as much as possible by implementing mitigation measures, as determined by a suitably qualified environmental professional

In addition, for the Cowies Creek Conservation Area, opportunities to enhance the MNES values of the area are maximised in the design and planning process for the class of actions.

EXTERNAL INFRASTRUCTURE DEVELOPMENT

External infrastructure development includes the supporting infrastructure and services class of actions where that is located outside the Growth Areas within the Strategic Assessment Area. The Plan shows indicative locations where external infrastructure development is intended to occur (see Figure 4-1).

The delivery of external infrastructure development is described further in Chapter 6.

4.3.5 ENVIRONMENTAL MANAGEMENT

The environmental management class of actions covers actions and activities that are required to facilitate environmental management under the Plan. The environmental management class of actions will be undertaken for the activity types and associated specific activities defined in Table 4-6.

Table 4-6: Activity types and example activities included in environmental management class of actions

Activity type	Examples of specific activities
Growling Grass Frog habitat construction and management	• Constructing and managing wetlands to provide habitat for the Growling Grass Frog in the Cowies Creek Conservation Area
Vegetation and habitat management activities	• Biomass reduction to manage native grasslands (such as controlled burns and sheep grazing) • Pest plant and animal control works • Revegetation activities (such as direct seeding) to restore degraded vegetation
Supporting infrastructure for avoided land	• Exclusion fencing • Signage • Paths or tracks required for management activities

All activities under the environmental management class of actions can only occur within the following locations (except where this is external infrastructure development – see below):

- Land subject to development
- Northern Conservation Area
- Eastern Conservation Area
- Gully avoidance area
- Cowies Creek Conservation Area
- Moorabool River corridor
- Moorabool avoidance area

Activities under this class of actions must be undertaken in accordance with the following principles and standards:

- Activities will only be undertaken only where it is sympathetic to or enhances habitat values or attributes for MNES
- Activities are consistent with any environmental objectives, outcomes, commitments or management actions established for the relevant areas, including any relevant Conservation Management Plans for the area
- The overall benefit of the activities is greater than the potential impacts
- The activities will be consistent with relevant best practice methods or guidelines, such as the *Growling Grass Frog Habitat Design Standards* (DELWP, 2017b) and other MNES standards as relevant (noting that these are likely to change and/or be updated throughout implementation of the Plan)
- The mitigation hierarchy is applied to ensure any negative impacts are avoided and mitigated as much as practicable while still allowing the necessary environmental management activity to be undertaken

EXTERNAL INFRASTRUCTURE DEVELOPMENT

External infrastructure development includes the environmental management class of actions where that is located outside the Growth Areas within the Strategic Assessment Area. The Plan shows indicative locations where external infrastructure development is intended to occur (see Figure 4-1).

The delivery of external infrastructure development is described further in Chapter 6.

4.3.6 DEVELOPMENT NOT COVERED BY THE PLAN

Development that is not covered by the Plan includes the following:

- Actions excluded under Section 146BA of the EPBC Act, including but not limited to:
  - Actions that were previously determined to be a non-controlled action or that were already approved under the EPBC Act
  - Actions that do not require approval under Part 9 of the EPBC Act (e.g. actions that are subject to continuing use provisions)
  - Actions subject to a current referral or assessment under Parts 7-9 of the EPBC Act at the time the Minister approves actions under the endorsed Plan
  - A national interest exemption allows the action to be taken without approval
- Any classes of actions that are not described in the Plan
- The following specific impact activities (as defined in the VPP) that were considered in the planning process for the strategic assessment and excluded from the Plan:
  - Airport
  - All activities included within the 'earth and energy resources industry' category under the VPP
  - All activities included within the 'recreational boat facility' category under the VPP
  - Aquaculture
  - Broiler farm
  - Cattle feedlot
  - Heliport
  - Intensive animal production
  - Intensive dairy farm
  - Marine dredging
  - Pig farm
  - Poultry farm
  - Poultry hatchery
  - Reservoir[1]
  - Rice growing
  - Timber production
  - Wharf
  - Wind energy facility

If actions that have been excluded from the scope of the Plan are proposed to take place within the Plan area in the future, they will be subject to separate assessment and approval under the EPBC Act.

[1] Note, this impact type is defined in the VPP as "a natural or artificial lake used as a source of water supply that is owned or managed by a public authority". It does not include water retarding basins

4.4 PERSONS WHO CAN UNDERTAKE DEVELOPMENT AND THEIR OBLIGATIONS

Any person can undertake development within the Plan area and access the associated Part 10 EPBC approval provided the following requirements are met:

- Development must comprise the classes of actions as defined in this Chapter
- Development must only occur in the development land as defined in this Chapter
- Development must proceed in accordance with any Commonwealth conditions of approval
- Development must proceed in accordance with the Plan, including the avoidance and minimisation, mitigation and offset requirements of the Plan
- Developers must pay any required biodiversity levy (see Section 7.4.3) or (for process based development) meet the process requirements set out in Chapter 6
- Development must be registered in accordance with the developer registration system (see Section 7.5.4)
- Development must comply with any conditions imposed by way of the developer registration system *including* conditions concerning the delivery of offsets and an obligation to pay a levy when required

Development that does not meet these requirements may need separate approval under the EPBC Act.

The Victorian planning system is the key delivery framework for implementing the Plan (see Section 2.3).

The Commitments and Measures document details the specific measures that will be taken to ensure the Plan's requirements are incorporated in the Greater Geelong Planning Scheme.

4.5 CHANGES TO THE BOUNDARIES OF LAND SUBJECT TO DEVELOPMENT

The Plan provides a process to allow minor changes to the boundaries of land subject to development (as shown in Figure 4-1), where this is necessary to address panning issues during the preparation of PSPs. Proponents of the boundary change may include the City, developers, or infrastructure providers. Allowable changes are those that include or exclude lots, or sections of lots, that exist at the interface of the boundary of the land subject to development. These changes are considered minor. Other changes, such as the addition of entirely new areas of development land are not facilitated by this process. See Box 1 for further details on the types and examples of boundary changes that may occur.

Box 1: Types of minor changes to the boundaries of land subject to development

There are two broad types of minor boundary change that may occur:

1. <u>The external boundary of the Growth Areas may be adjusted</u>

This may be required during the PSP process to adjust the boundary of the land subject to development on lots that occur along the boundary of the Growth Area. For example, where the current boundary intersects a lot, the planning process may result in the adjustment of the boundary to remove or include the entire lot if required to support planning outcomes

2. <u>The internal boundaries of the land subject to development within the Growth Areas may be adjusted</u>

This may be required during the PSP process to adjust the boundary of the land subject to development on lots that occur along the internal land category boundaries within the Growth Areas, such as the boundary of land subject to development and avoided land (e.g. the Moorabool River corridor). The exact location and size of the land categories will be confirmed during PSP planning for the relevant precinct, and therefore the boundary of the land subject to development (and the conservation or avoided area which it borders) may be adjusted slightly where the boundary currently intersects a lot, or where additional boundary lots are included or excluded

Provided that the proposed minor changes to the boundaries of land subject to development are made in accordance with the requirements of the Plan (see Section 4.5.1 below), any impacts of these changes on MNES are covered by the Part 10 EPBC approval associated with the Plan and additional approval is not required under Part 9 of the EPBC Act.

The commitment allowing minor boundary changes is set out in Table 4-1. This requires any changes to meet the eligibility for consideration and be in accordance with the process for considering changes set out in this section.

4.5.1 REQUIREMENTS TO BE MET

ELIGIBILITY FOR CONSIDERATION

The following criteria must be met for boundary changes to land subject to development to be eligible for consideration:

- The boundary change is minor in terms of impact to MNES (see process for consideration below), and
- The boundary change is necessary to support a planning proposal identified through the PSP process to either:
  - Meet the urban planning objectives or priorities of the relevant PSP, or
  - Reduce the risk of impacts from the development on MNES, and
- It can be demonstrated that no feasible urban design alternatives to the planning proposal requiring the boundary change exist within the existing boundary of land subject to development, and
- The boundary change does not modify the boundaries of the Northern Conservation Area, Eastern Conservation Area, or Cowies Creek Conservation Area unless it can be demonstrated that there will be no increase in risks on MNES, and that there will be no net loss in extent and condition of habitat for MNES within the conservation areas

The City will consider planning proposals that require a boundary change to the land subject to development and advise proponents of their eligibility or how the planning proposal could be adjusted to meet the criteria.

PROCESS FOR CONSIDERING BOUNDARY CHANGES

The following process will be followed for planning proposals requiring a boundary change to the land subject to development that are deemed eligible by the City for consideration:

- Undertake ecological surveys within the proposed new land subject to development for all protected matters with the potential to occur. Surveys must be undertaken by a qualified ecologist in accordance with relevant guidelines
- Prepare a report assessing the potential direct and indirect impacts of the planning proposal on protected matters within the proposed new land subject to development. The report must demonstrate how impacts will be avoided and minimised, mitigated, and offset in accordance with the offsets mitigation hierarchy and the EPBC Act Offsets Policy (DSEWPC, 2012b)
- The report must be provided to the Strategic Assessment Implementation Group (see Section 7.3) along with GIS spatial files showing the boundary change and proposed location of the new land subject to development
- The Strategic Assessment Implementation Group will consider the report to ensure it is eligible for consideration (including confirmation that the change is minor) and if eligible, will provide a copy to the EPBC Plan Executive Leadership Group
- If the planning proposal within the proposed new land subject to development will or has the potential to significantly impact MNES (either directly or indirectly), or proposes to modify the boundaries of the Northern Conservation Area, Eastern Conservation Area or the Cowies Creek Conservation Area, the change will require separate approval under Parts 7-9 of the EPBC Act. All other changes will require endorsement by the Strategic Assessment Implementation Group
- If the boundary change and proposed new land subject to development is approved:
  - Relevant maps in the BCS will be updated
  - The PSP will show the new boundary of land subject to development
  - The boundary change will be reported in the annual progress report for that year (see Section 7.5.4)

4.6 CROSS-BOUNDARY DEVELOPMENTS

The Plan provides approval under Part 10 of the EPBC Act for actions to occur within specific locations in the Strategic Assessment Area (development land), provided that development proceeds in accordance with any Commonwealth approval conditions and in accordance with the EPBC Plan and NWGGA Biodiversity Conservation Strategy. See Section 4.2 for locations of development, including a map.

The specific requirements for development vary depending on the location, including:

- The classes of actions that apply to development within specific locations (see Section 4.3)
- The principles set out for development associated within the Northern Conservation Area, Eastern Conservation Area, Cowies Creek Conservation Area, Moorabool River corridor, Moorabool avoidance area, and gully avoidance area (see Section 4.3.4 and 4.3.5).
- The process based development requirements for development within the portion of Heales Road East identified in Figure 4-1 and external infrastructure development (see Chapter 6)

Any development that falls outside of the Strategic Assessment Area is not covered by the Plan and would require separate approval under Parts 7-9 of the EPBC Act (as relevant).

During implementation of the Plan, some development may be required which crosses multiple different boundaries identified in the Plan. For example a road or utility easement may need to cross through the Strategic Assessment Area, and into a specific Growth Area.

When undertaking cross boundary development, the approval and development requirements that apply are dependent on where each portion of the development is located.

Development proponents undertaking an action that is not entirely covered by the Strategic Assessment can also seek approval for the entire action under a separate EPBC Act approval. However, this requires consent from the Minister under Section 146N of the EPBC Act.

See Box 2 below for a cross boundary development example.

Box 2: Cross boundary development example

A road is required to service the NGGA. The road starts outside of the Strategic Assessment Area, crosses the Strategic Assessment Area boundary in the Strategic Assessment Area, and then crosses the NGGA boundary into the NGGA land subject to development. The following approvals and requirements would apply for the road:

- The road portion that is located within land subject to development within the NGGA would have development approval under Part 10 of the EPBC Act without further assessment or approval
- The road portion that is located within the Strategic Assessment Area, but outside of the NGGA, would have development approval under Part 10 of the EPBC Act if undertaken in accordance with the requirements for process based development in Section 6.3 of the Plan
- The road portion that is located outside of the Strategic Assessment Area would not have approval under Part 10 of the EPBC Act, and would require separate approval under Parts 7-9 of the EPBC Act

Alternatively, the proponent of the action could seek separate approval under Parts 7-9 of the EPBC Act for the entire action (including within the Strategic Assessment Area). This would require application to the Minister under Section 146N of the EPBC Act, whereby the Minister will make a determination on whether separate approval can be sought for the entire action.

5 Conservation framework

5.1 INTRODUCTION

The Plan includes a conservation framework for protecting MNES that has been developed to achieve the Plan's objective and biodiversity-related outcomes.

The Plan's conservation framework for protecting MNES has been developed in accordance with the offset mitigation hierarchy (DSEWPC, 2012b). The mitigation hierarchy requires impacts on MNES to be firstly avoided and minimised to the greatest extent practicable, and then mitigated. The remaining residual impacts can then be offset.

This Chapter describes the Plan's conservation framework, including:

- Purpose of the conservation framework
- Relevant protected matters for the Plan
- Avoidance and minimisation of impacts
- Mitigation of impacts
- Residual impacts and offsets

5.1.1 IMPLEMENTATION OF THE CONSERVATION FRAMEWORK

The Plan's conservation framework for protecting MNES will be implemented through a series of commitments set out in this Chapter and through a series of detailed measures that are provided in the Commitments and Measures document. Further description of the measures and their implementation are provided in the Commitments and Measures document and BCS.

While the commitments associated with the Plan's conservation framework will not change, the measures proposed to implement these commitments are subject to change (see Section 3.2). This would occur through an adaptive management process in accordance with the Plan's MERI framework (see Section 7.5). The BCS and Commitments and Measures document may be updated from time to time over the life of the Plan (see Section 7.7.3).

The Plan's assurance and implementation framework (see Chapter 7) also supports the conservation framework. This includes a range of commitments to support delivery of the conservation framework, including relating to governance, MERI, compliance, and funding the implementation of the Plan.

5.2 PURPOSE OF THE CONSERVATION FRAMEWORK

The purpose of the conservation framework is to ensure:

- Development within the Plan area avoids and minimises, mitigates, and offsets impacts to MNES in accordance with the requirements of the EPBC Act and the Endorsement Criteria in the Strategic Assessment Agreement
- The Plan's biodiversity-related outcomes for MNES are achieved

5.3 RELEVANT PROTECTED MATTERS

Protected matters relevant to the Plan are the protected matters that may be impacted directly, indirectly and/or cumulatively by actions proposed to be taken under the Plan (as defined in the Strategic Assessment Agreement). For these matters, an assessment of the potential impacts of the proposal is required in the SAR. The SAR provides the method for identifying relevant protected matters that have the potential to be impacted (see Part 3 of SAR) and assesses impacts to each relevant protected matter (see Part 4 of SAR).

SPECIES AND ECOLOGICAL COMMUNITIES

The relevant species and ecological communities are listed in Table 5-1. These include one threatened ecological community, 28 threatened species, and three migratory species (not listed as threatened).

Table 5-1: Relevant species and ecological communities

Type of relevant protected matter	Species or ecological community
Threatened ecological communities (TECs)	Natural Temperate Grassland of the Victorian Volcanic Plain
Threatened flora	*Lachnagrostis adamsonii* (Adamson's Blown-grass)
	Pimelea spinescens subsp. *spinescens* (Spiny Rice-flower)
Threatened fauna	*Arenaria interpres* (Ruddy Turnstone)
	Botaurus poiciloptilus (Australasian Bittern)
	Calidris acuminata (Sharp-tailed Sandpiper)
	Calidris canutus (Red Knot)
	Calidris ferruginea (Curlew Sandpiper)
	Calidris tenuirostris (Great Knot)
	Charadrius leschenaultii (Greater Sand Plover)
	Charadrius mongolus (Lesser Sand Plover)
	Delma impar (Striped Legless Lizard)
	Galaxiella toourtkoourt (Little Galaxias)
	Gallinago hardwickii (Latham's Snipe)
	Limosa lapponica baueri (Western Alaskan Bar-tailed Godwit)
	Limosa limosa (Black-tailed Godwit)
	Ranoidea raniformis (Growling Grass Frog)
	Nannoperca obscura (Yarra Pygmy Perch)
	Neophema chrysogaster (Orange-bellied Parrot)
	Neophema chrysostoma (Blue-winged Parrot)
	Numenius madagascariensis (Eastern Curlew)
	Prototroctes maraena (Australian Grayling)
	Pseudemoia rawlinsoni (Glossy Grass Skink)
	Rostratula australis (Australian Painted Snipe)
	Sternula albifrons (Little Tern)
	Sternula nereis nereis (Australian Fairy Tern)
	Synemon plana (Golden Sun Moth)
	Tringa nebularia (Common Greenshank)
	Tympanocryptis pinguicolla (Victorian Grassland Earless Dragon)
Migratory species	*Calidris ruficollis* (Red-necked Stint)
	Charadrius bicinctus (Double-banded Plover)
	Tringa stagnatilis (Marsh Sandpiper)

OTHER RELEVANT PROTECTED MATTERS

One Ramsar site, the Port Phillip Bay (Western Shoreline) and Bellarine Peninsula is also a relevant protected matter. Parts of this Ramsar site are located downstream of the Growth Areas and have the potential to be indirectly impacted by the proposed development under the Plan associated with changes to water flows and water quality.

No other protected matters were determined as relevant. Other matters may be identified as relevant throughout implementation of the Plan which will be captured through the adaptive management process (see Section 7.5.4).

5.4 AVOIDANCE AND MINIMISATION OF IMPACTS

5.4.1 CONTEXT

Avoiding and minimising impacts to MNES is the first step in the offset mitigation hierarchy. The avoidance process provides opportunities to avoid and protect areas of high biodiversity value and is fundamental to a determination that commitments adequately address the likely impacts on MNES and reducing the need for offsets.

Avoidance is a requirement of the Endorsement Criteria in the Strategic Assessment Agreement (Attachment 2, Clause 3(c)), which requires the Plan to describe how impacts will be avoided. Avoidance is defined in the Plan as any land not directly impacted by development within the Growth Areas.

The Plan considered the proposed development for the Growth Areas set out in the Framework Plan and applied a strategic planning process to consider and resolve conflicts between areas identified as high biodiversity value and areas proposed for development in the Framework Plan. This avoidance planning comprised three processes:

- Strategic level planning to locate the Growth Areas and identify initial avoidance priorities
- Locating and designing the development within the Growth Areas to avoid impacts
- Future precinct and site-scale planning

These processes are described in detail in the BCS, and avoidance outcomes for MNES are justified in the SAR.

The strategic planning process at the Growth Area level led to the identification in the Plan of four strategic conservation areas that will be avoided from development and protected to conserve MNES in-perpetuity. Strategic conservation areas represent high biodiversity value areas that contain the most important Commonwealth, State and local biodiversity values in the Growth Areas, and are the areas considered most likely to be viable in the long-term because of their size, condition, shape and location in the landscape. These strategic conservation areas include the:

- Northern Conservation Area in the NGGA
- Eastern Conservation Area in the NGGA
- Cowies Creek Conservation Area in the WGGA
- Moorabool River corridor in the WGGA[2]

These strategic conservation areas are described in Section 5.4.3.

In addition, the strategic planning process identified two additional avoidance areas. Avoidance areas represent locations which support Commonwealth, State, and local biodiversity values, which may not be appropriate for formal protection and management (as an offset) under the Plan. The avoidance areas include the:

- Gully avoidance area in the NGGA
- Moorabool avoidance area in the WGGA (indicative only see Section 5.4.3 for details)

[2] The Moorabool River corridor was identified to protect State and local biodiversity values within the Growth Areas. While this area may have benefits for MNES, it was not identified in the Plan as being needed for the protection of MNES. The EPBC Strategic Assessment process allows for the investigation and development of management plans for this land. However, the management and associated outcomes will not be funded or reported on under the EPBC Part 10 approval. The BCS sets out the process the protection and ongoing management of the Moorabool River corridor

The avoidance areas are described in Section 5.4.3.

5.4.2 COMMITMENTS FOR AVOIDANCE AND MINIMISATION

The Plan's commitments for avoidance and minimisation are provided in Table 5-2. See the Commitments and Measures document for measures relating to avoidance.

Table 5-2: Commitments for avoidance

No.	Commitment
4	The Northern Conservation Area will be established in perpetuity to avoid and protect 50.5 ha of habitat for Striped Legless Lizard, 82 ha of habitat for Golden Sun Moth, and 81 ha of habitat potentially important for the recovery of Victorian Grassland Earless Dragon
5	A Conservation Management Plan will be prepared by a suitably qualified environmental professional and implemented for the protection and ongoing management of Striped Legless Lizard, Golden Sun Moth and Victorian Grassland Earless Dragon within the Northern Conservation Area
6	The Eastern Conservation Area will be established in perpetuity to avoid and protect 5.5 ha of habitat for Natural Temperate Grassland
7	A Conservation Management Plan will be prepared by a suitably qualified environmental professional and implemented for the protection and ongoing management of Natural Temperate Grassland within the Eastern Conservation Area
8	The gully avoidance area will avoid 3.5 ha of habitat for Striped Legless Lizard, 7 ha of habitat for Golden Sun Moth and 2.5 ha of Natural Temperate Grassland
9	The Cowies Creek Conservation Area will be established in perpetuity to avoid and protect habitat needed to support the continued persistence of the Growling Grass Frog and potential habitat for Glossy Grass Skink in the WGGA
10	A Conservation Management Plan will be prepared by a suitably qualified environmental professional and implemented for the protection and ongoing management of Growling Grass Frog, and areas of potential habitat for Adamson's Blown-grass and Glossy Grass Skink within the Cowies Creek Conservation Area
11	Habitat enhancement works for the Growling Grass Frog will be undertaken in Cowies Creek downstream of the WGGA to support the: • Long-term viability of the Cowies Creek metapopulation of Growling Grass Frogs • Persistence of the species within the WGGA
12	Development within the Moorabool avoidance area will be restricted to support the potential MNES values of the river corridor and the escarpment
19	Development within the portion of Heales Road East subject to process based development (as shown in Figure 4-1 of the Plan) will be designed and located to prioritise avoidance of impacts to MNES and native vegetation. This must ensure that any confirmed population or occurrence of MNES that would be considered important or notable (for instance, due to size, condition or potential contribution to the recovery of the MNES) is avoided and subsequently protected, maintained and managed to ensure the persistence of that population or occurrence in the long-term. Impacts to all other populations or occurrences will be avoided and minimised as far as practical

No.	Commitment
20	External infrastructure development will be designed and located to prioritise avoidance of impacts to MNES and native vegetation. The following specific avoidance outcomes will be delivered: • Spiny Rice-flower – any confirmed population or part of the population must be avoided and will be protected, maintained and managed to ensure the persistence of that population in the long-term • Victorian Grassland Earless Dragon - any confirmed population or part of the population must be avoided and will be protected, maintained and managed to ensure the persistence of that population in the long-term; and the recovery team will be notified • Other MNES – any confirmed population or occurrence that would be considered important or notable (for instance, due to size, condition or potential contribution to the recovery of the MNES) must be avoided and will be protected, maintained and managed to ensure the persistence of that population or occurrence in the long-term. Impacts to all other populations or occurrences will be avoided and minimised as far as practical

5.4.3 AVOIDANCE AND MINIMISATION WITHIN GROWTH AREAS

LOCATION AND DESCRIPTION OF STRATEGIC CONSERVATION AREAS AND AVOIDANCE AREAS

Northern Geelong Growth Area

The NGGA strategic conservation areas and avoidance areas were confirmed by the City through a Structured Decision Making process that led to confirmation of additional areas for conservation that were not identified in the Framework Plan. These conservation areas:

- Support multiple important biodiversity values
- Focus on the largest mapped habitat area for Striped Legless Lizard within the NGGA and a substantial area of mapped habitat for the Golden Sun Moth
- Provide restoration potential for Striped Legless Lizard and Golden Sun Moth in potentially suitable areas not currently mapped as habitat
- Protect the largest patch of Natural Temperate Grassland within the NGGA
- Protect a large area with potentially suitable habitat attributes for Victorian Grassland Earless Dragon which may support the recovery of the species

Northern Conservation Area

The Northern Conservation Area is shown in Figure 4-1. The Northern Conservation Area will lead to the avoidance and protection of[3]:

- 108 ha of habitat for the Golden Sun Moth. Of this, 82 ha forms part of the formal offset commitment under the Plan
- 73.5 ha of habitat for the Striped Legless Lizard. Of this, 50.5 ha forms part of the formal offset commitment under the Plan
- 105 ha of potentially suitable areas for the recovery of Victorian Grassland Earless Dragon
- 55 ha of mapped native vegetation (Plains Grassland EVC 132)

[3] At the time of finalising the Plan there was an ongoing compliance investigation being conducted in relation to the potential loss of biodiversity values on 135 Staceys Road. Part of this property is within the Northern Conservation Area and supports mapped habitat for Striped Legless Lizard and Golden Sun Moth, and mapped habitat that is potentially important to the recovery of the Victorian Grassland Earless Dragon. For completeness, these mapped values are included in the avoidance area statistics presented for the Northern Conservation Area. However, for the purposes of offsets it is assumed that these values have been lost and the area required for offsets outside the NGGA has been increased accordingly (see Section 5.6 for details about offsets).

The key aim of the conservation area is to protect and manage habitat for Striped Legless Lizard and Golden Sun Moth, and habitat potentially important for the recovery of Victorian Grassland Earless Dragon in perpetuity. It will do this by:

- Protecting habitat supporting populations of Striped Legless Lizard and Golden Sun Moth
- Improving the condition of habitat for Striped Legless Lizard and Golden Sun Moth
- Protecting and improving potentially suitable areas for the recovery of Victorian Grassland Earless Dragon

Eastern Conservation Area

The Eastern Conservation Area is shown in Figure 4-1. This area supports 5.5 ha of mapped native vegetation (Plains Grassland EVC 132) which meets the conditions thresholds for Natural Temperate Grassland.

The key aim of the conservation area is to protect and manage habitat for Natural Temperate Grassland in perpetuity. It will do this by:

- Protecting habitat that supports Natural Temperate Grassland
- Improving the condition of habitat for Natural Temperate Grassland

There is also opportunity for the expansion of Striped Legless Lizard habitat through regeneration or restoration of suitable areas.

Gully avoidance area

The gully avoidance area is shown in Figure 4-1. The area supports:

- 7 ha of habitat for Golden Sun Moth
- 3.5 ha of habitat for Striped Legless Lizard
- 2.5 ha of habitat for Natural Temperate Grassland
- 5.6 ha of mapped native vegetation (Plains Grassland EVC 132)

The key aim of the avoidance area is to protect habitat for Striped Legless Lizard, Golden Sun Moth and Natural Temperate Grassland. It will do this by:

- Protecting habitat for Striped Legless Lizard, Golden Sun Moth and Natural Temperate Grassland through avoidance and restriction of development
- Providing connectivity to the Eastern Conservation Area to facilitate potential expansion of the Striped Legless Lizard

Western Geelong Growth Area

Cowies Creek Conservation Area

The Cowies Creek Conservation Area in the WGGA is shown in Figure 4-1. The area supports:

- An important population of the Growling Grass Frog that is connected to a larger metapopulation downstream, as well as all remaining habitat for Growling Grass Frog in the WGGA
- A previously known record of Adamson's Blown-grass
- Approximately 12.2 ha of medium quality (and a small portion of low quality) potentially suitable habitat for Glossy Grass Skink
- Areas of mapped Creekline Grassy Woodland (EVC 68)

A key aim of the conservation area will be to support the persistence of the Growling Grass Frog within the WGGA and maintain the metapopulation dynamics with the broader Cowies Creek metapopulation downstream. It will do this by:

- Protecting high quality instream habitat
- Helping to improve the condition of lower quality instream habitat
- Protecting terrestrial habitat in buffer areas adjacent to the creek

- Regenerating areas of terrestrial habitat that are degraded through historical land uses
- Providing for the creation of off-stream habitat

Cowies Creek downstream of the WGGA

Cowies Creek downstream of the WGGA provides habitat for the connected metapopulation of Growling Grass Frog that occurs along the creek. There are a range of opportunities to enhance habitat within this area to support:

- Long-term viability of the metapopulation
- Persistence of the species within the WGGA

The following habitat enhancement works for Growling Grass Frog will be considered as part of a detailed design process for the area downstream of the WGGA:

- The creation of one or more off-line wetlands to create habitat for the species
- Vegetation management to improve habitat quality for the species
- Infrastructure changes to improve connectivity for the species under the Bluestone Bridge along Cowies Creek

Moorabool avoidance area

The Moorabool avoidance area is shown in Figure 4-1 (indicative only). The area supports:

- 6.8 ha of areas assumed to support potentially suitable habitat attributes for Victorian Grassland Earless Dragon. Noting these areas are substantially fragmented by agricultural land on the surrounding properties, and considered too small to meet the definition of areas important for recovery for the species
- 6.6 ha of mapped native vegetation (Plains Grassland EVC 132)
- 0.3 ha of mapped Floodplain Riparian Woodland (EVC 56)

The key aim of the avoidance area is to support the potential MNES values of the Moorabool River and escarpment. It will do this by avoiding impacts to potential MNES values and restricting development to minimise potential indirect impacts to the Moorabool River.

The Moorabool avoidance as shown in Figure 4-1 is indicative only. The extent of this area is informed by the parcel boundary of 68 Bridge Street, Batesford where it extends beyond the Moorabool River corridor. The exact location and size of the area will be confirmed during PSP planning for the Batesford North precinct.

Moorabool River corridor

The Moorabool River corridor was identified to protect State and local biodiversity values within the WGGA. While this area may also provide benefits for downstream MNES, it was not identified in the Plan as being needed for the protection of MNES. The BCS sets out the process the protection and ongoing management of the Moorabool River corridor.

PROTECTION AND MANAGEMENT OF STRATEGIC CONSERVATION AREAS

Three of the strategic conservation areas have been identified as a priority for protection and management of MNES values under the Plan:

- The Northern Conservation Area in the NGGA
- The Eastern Conservation Area in the NGGA
- Cowies Creek Conservation Area in the WGGA

The protection and management of these three areas is described further below. While the gully avoidance area and Moorabool avoidance area are still important for protecting biodiversity values including MNES, their protection and management is described in the BCS.

The commitments to avoid, protect and manage the Northern Conservation Area, Eastern Conservation Area, and the Cowies Creek Conservation Area will be implemented through a series of measures set out in the Commitments and Measures document and described further in the BCS. These measures will ensure that these strategic conservation areas are protected and actively managed to maintain and enhance their MNES values in the long-term.

Planning to finalise strategic conservation area boundaries

At the time of finalising the Plan, significant planning around the boundaries of the conservation areas had been undertaken through the strategic assessment process as well as the PSP processes for Creamery Road (in the WGGA) and Elcho Road East (in the NGGA).

The boundaries of the Northern Conservation Area, Eastern Conservation Area, and the Cowies Creek Conservation Area as presented in the Plan are expected to be the final boundaries.

Planning controls and mechanisms to secure land within strategic conservation areas

The Northern Conservation Area, Eastern Conservation Area, and Cowies Creek Conservation Area will be purchased and/or vested in the City as a reserve to be managed for conservation purposes.

The strategic conservation areas will also be protected through planning controls as well as security agreements to ensure the protection and management of the land for conservation in-perpetuity.

The planning controls are proposed to include:

- Identifying the strategic conservation areas in relevant PSPs as land to be protected for conservation in the urban structure maps of the precinct, to direct development away from these areas
- Applying an appropriate environment zone to the strategic conservation areas under the Greater Geelong Planning Scheme, to limit the use and development that can occur within the strategic conservation area
- Identifying the native vegetation in the strategic conservation areas as 'to be retained' within the relevant NVPPs, to ensure a permit is required to remove that native vegetation

The strategic conservation areas will be secured under in-perpetuity, on-title agreements consistent with the security requirements of the *Guidelines for the removal, destruction or lopping of native vegetation* (DELWP, 2017c).

Preparation and implementation of Conservation Management Plans for strategic conservation areas

The City will prepare and implement Conservation Management Plans over the life of the Plan to provide for the protection and ongoing management of the biodiversity values within the Northern Conservation Area, Eastern Conservation Area, and the Cowies Creek Conservation Area.

Conservation Management Plans will be prepared by suitably qualified environmental professionals in accordance with the Commonwealth Environmental Management Plan Guidelines (DoE, 2014). The Conservation Management Plan for Cowies Creek will also be prepared in accordance with the Growling Grass Frog Habitat Design and Crossing Standards (DELWP, 2017b, 2017a).

Each Conservation Management Plan is proposed to include the following information, as relevant:

- Objectives of the Conservation Management Plan
- Boundaries of the conservation areas
- Native vegetation to be retained as identified in the relevant NVPP for the precinct
- Extent and condition of biodiversity values in the areas, including habitat and records
- Management actions and arrangements to protect, and where appropriate, restore, the biodiversity values of the conservation areas, including management methods, standards and techniques, roles and responsibilities, timing for implementation, funding and monitoring and reporting
- For the Northern Conservation Area, managing the threat of cat predation for Striped Legless Lizard and Victorian Grassland Earless Dragon
- For the Cowies Creek Conservation Area identify any locations suitable for public access points, walking paths/trails, passive recreation, and water management assets and associated infrastructure

The City proposes to fund the implementation of the Conservation Management Plans using the implementation fund established under the Plan's funding framework. The funding framework is described in Section 7.3.6 and the specific measures for funding are provided in the Commitments and Measures document.

ADDITIONAL AVOIDANCE THROUGH PROCESS BASED DEVELOPMENT

Development within the portion of Heales Road East subject to process based development (as shown in Figure 4-1 of the Plan) and external infrastructure development is subject to additional avoidance processes in accordance with Commitments 19 and 20 . These processes will ensure appropriate avoidance of impacts to MNES in these locations.

5.5 MITIGATION OF IMPACTS

5.5.1 CONTEXT

Mitigating impacts to MNES is the second step in the offset mitigation hierarchy. The mitigation process reduces how likely or significant unavoidable impacts may be and further reduces the need for offsets.

Mitigation of impacts is a requirement of the Endorsement Criteria in the Strategic Assessment Agreement (Attachment 2, Clause 3(c)), which requires the Plan to describe how impacts will be mitigated.

Development under the Plan has the potential to indirectly impact habitat and populations of MNES within the Growth Areas and within the Plan area outside the Growth Areas. These indirect impacts relate to:

- Altered fire regimes
- Changes to water flows and water quality
- Disturbance due to noise, dust, litter, or light
- Disturbance from increased public access to natural areas
- Fauna mortality and barriers to movement
- Inadvertent impacts on adjacent habitat or vegetation
- Predation or competition by pest or domestic fauna
- Spread of infection or disease
- Spread or introduction of weeds

The Plan includes commitments to ensure each of these indirect impacts is mitigated. These commitments are expected to substantially reduce the risk of residual impacts to MNES associated with these indirect impacts to the extent that offsets for these impacts are not required (see Part 4 of SAR).

5.5.2 COMMITMENTS FOR MITIGATION

The Plan's commitments for mitigation are provided in Table 5-3. See the Commitments and Measures document for measures relating to mitigation.

Table 5-3: Commitments for mitigation

No.	Commitment
13	Standard mitigation measures will continue to be implemented to minimise the indirect impacts of the development on MNES in accordance with the requirements of the *Greater Geelong Planning Scheme* (The City of Greater Geelong, 2022), as updated from time to time, and generally in accordance with the Framework Plan (The City of Greater Geelong, 2021)
14	The following additional specific mitigation measures will be implemented to minimise the indirect impacts of development on the strategic conservation areas and avoidance areas: • Establish a conservation interface for land abutting conservation areas and avoidance areas • Design and baffle public lighting in accordance with National Light Pollution Guidelines for Wildlife to prevent light spill and glare within the Cowies Creek Conservation Area • Ensure the Construction Environmental Management Plans for construction works on land immediately adjacent to the conservation areas have specific regard to the CMP for the adjoining land

No.	Commitment
15	Additional specific mitigation measures will be implemented to minimise the indirect impacts of the development on MNES associated with waterways, riparian areas and wetlands including: • EPBC listed threatened and migratory birds • *Galaxiella toourtkoourt* (Little Galaxias) • *Ranoidea raniformis* (Growling Grass Frog) • *Nannoperca obscura* (Yarra Pygmy Perch) • *Prototroctes maraena* (Australian Grayling) • *Pseudemoia rawlinsoni* (Glossy Grass Skink) • *Lachnagrostis adamsonii* (Adamson's Blown-grass) • Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar site

5.5.3 IMPLEMENTATION OF MITIGATION FOR THE GROWTH AREAS

Mitigation measures for biodiversity values will mostly be determined and implemented through the Victorian planning system as development proceeds (see Chapter 2.3). This will deliver a range of standard mitigation measures through the PSP process, existing provisions in the Greater Geelong Planning Scheme, and the planning permit process, which will address many of the potential indirect impacts of development.

This standard mitigation includes measures such as stormwater management, erosion control, and management of construction sites. The Plan includes a commitment to ensure these standard mitigation measures continue to be implemented to address the range of indirect impacts of the development.

The assessment of potential indirect impacts to MNES in the SAR identified several additional specific mitigation measures beyond those delivered through the existing planning system. These are required to address specific risks to MNES associated with waterways, riparian areas and wetlands, as well as other environmental values within conservation areas. The specific mitigation measures will also mostly be delivered through the existing planning system and will provide additional protection to State and local biodiversity values.

STANDARD MITIGATION MEASURES

The standard mitigation measures and their implementation through the PSP process, existing provisions in the Greater Geelong Planning Scheme, and the planning permit process, are described further in the BCS.

The City will be responsible for implementing the standard mitigation measures. The City will make decisions about what standard mitigation is implemented to address impacts in accordance with the Greater Geelong Planning Scheme and the specific circumstances of the relevant precinct and proposed subdivision or development.

ADDITIONAL SPECIFIC MITIGATION MEASURES

The Plan includes commitments to implement additional specific mitigation measures beyond that delivered through the existing planning system to address specific risks to MNES and minimise indirect impacts on:

- Protected matters associated with waterways, riparian areas and wetlands
- The strategic conservation areas and avoidance areas

Commitment 15 relates to mitigation of impacts on waterways, riparian areas and wetlands, and is proposed to be implemented through the preparation of technical studies to understand the key risks from development on MNES associated with Hovells Creek and the Moorabool River. These studies aim to:

- Address risks associated with changes to water quality and hydrology from the development in the Growth Areas
- Identify measures, standards or targets to mitigate impacts on MNES including, as relevant:
  - Water quality parameters
  - Water retention and flow management requirements
  - Limits on extraction or use

- Habitat buffer requirements
- Monitoring and reporting

It is proposed that guidelines are prepared based on the results of these studies to guide the preparation of PSPs and decisions on planning permits and permit conditions to ensure risks to MNES in relation to these impacts are adequately managed. A planning scheme amendment or other appropriate process is proposed to be undertaken to ensure the guidelines are considered during the preparation of PSPs and in decisions on planning permits and permit conditions.

Under Commitment 14, a set of mitigation measures are proposed in relation to mitigation of impacts on the strategic conservation areas and avoidance areas. These include:

- Identifying a conservation interface between urban development and the boundaries of the strategic conservation areas and avoidance areas within relevant PSPs
- Designing and baffling public lighting to prevent light spill and glare within the Cowies Creek Conservation Area by including this as a requirement or guideline in the relevant PSP, or as a condition on permits, as appropriate
- Preparing Construction Environmental Management Plans for construction works on land immediately adjacent to the strategic conservation areas, by including this as a requirement or guideline in the relevant PSP, or as a condition on permits, as appropriate. The Construction Environmental Management Plans should have regard to the CMP for the adjoining land

Commitments for avoidance and minimisation (see Section 5.4.2) are also relevant to minimising the indirect impacts of the development on MNES. These require the preparation and implementation of Conservation Management Plans for the protection and ongoing management of Striped Legless Lizard, Golden Sun Moth, and habitat for the potential recovery of Victorian Grassland Earless Dragon within the Northern Conservation Area, Natural Temperate Grassland within the Eastern Conservation Area, and Growling Grass Frog, potentially suitable habitat for Glossy Grass Skink, and habitat for Adamson's Blown-grass within the Cowies Creek Conservation Area.

5.6 RESIDUAL ADVERSE IMPACTS AND OFFSETS

5.6.1 CONTEXT

Offsetting impacts to MNES is the final step in the offset mitigation hierarchy. Offsetting is intended to compensate for any residual adverse impacts that remain after impacts have been avoided and minimised, and mitigated.

Offsets are a requirement of the Endorsement Criteria in the Strategic Assessment Agreement, which requires the Plan to provide for offsets in accordance with the principles of the EPBC Act Offsets Policy (Attachment 2, Clause 3(d)).

Development under the Plan will result in residual adverse impacts in the NGGA to Natural Temperate Grassland, Striped Legless Lizard, Golden Sun Moth, and habitat potentially important for the recovery of Victorian Grassland Earless Dragon (noting that this species was not recorded in the NGGA as part of targeted surveys) (see Section 5.6.2).

The Plan establishes a strategic offsets approach that aims to maximise the benefits to MNES. It does this through two key approaches to ensure the Plan's outcomes are achieved:

- Coordinated offset delivery within the NGGA which is a key outcome of the strategic avoidance planning process, and provides in-situ protection and management of the key MNES, local to the areas impacted by development under the Plan
- Focusing offsets on large patches of native vegetation and habitat that are well located in the landscape from a biodiversity perspective, including prioritising sites that:
  - Occur within key biodiversity corridors and improve connectivity across the landscape
  - Are connected to existing conservation reserves

The commitments for offsetting are set out in Section 5.6.3 below.

Conservation planning science (for example, see (Gordon *et al.*, 2011)) confirms the benefits of strategic approaches to offsetting and supports the position that the Plan's approach to offsets will be substantially stronger than what would occur under standard project-by-project approvals. Supporting Document D to the SAR provides the method and rationale for the offset package. This includes a detailed explanation and justification of the offset requirements and the consistency of the offsets package with the principles of the EPBC Act Offsets Policy (DSEWPC, 2012b).

5.6.2 RESIDUAL ADVERSE IMPACTS FROM DEVELOPMENT WITHIN THE GROWTH AREAS

Development under the Plan (excluding process based development, see Chapter 6) will result in the clearance and direct loss of the following MNES in the NGGA:

- Natural Temperate Grassland – 10.2 ha
- Striped Legless Lizard habitat – 149.8 ha
- Golden Sun Moth habitat – 651.0 ha (noting that 490.1 ha of this comprises areas of non-native vegetation)
- Habitat potentially important for the recovery of Victorian Grassland Earless Dragon – 64.2 ha

It is noted that there are no residual adverse impacts to MNES in the WGGA, and offsets are not necessary for development in that location.

A detailed analysis and discussion of direct impacts to these MNES is provided in Chapters 19 and 21 of the SAR.

5.6.3 COMMITMENTS FOR OFFSETS

The Plan's commitments for offsetting residual adverse impacts are provided in Table 5-4. See the Commitments and Measures document for measures relating to offsets.

Table 5-4: Commitments for offsetting

No.	Commitment
4	The Northern Conservation Area will be established in perpetuity to avoid and protect 50.5 ha of habitat for Striped Legless Lizard, 82 ha of habitat for Golden Sun Moth, and 81 ha of habitat potentially important for the recovery of Victorian Grassland Earless Dragon
5	A Conservation Management Plan will be prepared by a suitably qualified environmental professional and implemented for the protection and ongoing management of Striped Legless Lizard, Golden Sun Moth and Victorian Grassland Earless Dragon within the Northern Conservation Area
6	The Eastern Conservation Area will be established in perpetuity to avoid and protect 5.5 ha of habitat for Natural Temperate Grassland
7	A Conservation Management Plan will be prepared by a suitably qualified environmental professional and implemented for the protection and ongoing management of Natural Temperate Grassland within the Eastern Conservation Area
16	Offset sites will be established to meet the following requirements: • 21 ha of Natural Temperate Grassland • 342 ha of known habitat for Striped Legless Lizard • 506 ha of known habitat for Golden Sun Moth These offsets will be delivered through a combination of: • The Northern and Eastern Conservation Areas (Commitments 4 and 6), and • Strategic offset locations outside of the NGGA to meet the balance of the offset requirements • Works in Kind, Land in Kind or Offsets in Kind arrangements where appropriate
17	The Victorian Grassland Earless Dragon Trust Fund will be established. A total amount of $12.7 million will be paid into the Trust Fund, to contribute to the recovery efforts of the species. Funding for the trust will include: • $1 million at establishment of the Trust Fund • $11.7 million paid via annual contributions, the final payment occurring before the end of Year 25 of the Plan
18	Offset delivery will keep pace with and occur ahead of impacts within the NGGA

No.	Commitment
21	Unavoidable clearing of any areas confirmed to support MNES due to development within the portion of Heales Road East subject to process based development (as shown in Figure 4-1 of the Plan) or external infrastructure development will be offset in accordance with the EPBC Act Environmental Offsets Policy and associated Offsets Assessment Guide (or equivalent) (Commonwealth of Australia, 2012; DSEWPC, 2012b)

5.6.4 DESCRIPTION OF OFFSETS

To compensate for the impacts to MNES in the NGGA, the Plan commits to:

- Protecting and managing the Northern Conservation Area to provide benefits for Striped Legless Lizard, Golden Sun Moth, and habitat potentially important for the recovery of Victorian Grassland Earless Dragon
- Protecting and managing the Eastern Conservation Area to provide benefits to Natural Temperate Grassland
- Securing additional land based offsets for Natural Temperate Grassland, Striped Legless Lizard and Golden Sun Moth outside the Growth Areas
- Establishing a Victorian Grassland Earless Dragon Trust to provide funding for key recovery actions for the species

OFFSETS FOR NATURAL TEMPERATE GRASSLAND, STRIPED LEGLESS LIZARD AND GOLDEN SUN MOTH

Offsets for Natural Temperate Grassland, Striped Legless Lizard and Golden Sun Moth are based on the delivery of direct land based offsets for each MNES both within and outside the NGGA. The Northern Conservation Area and the Eastern Conservation Area will meet a part of these requirements, and the remaining offsets will be delivered outside the Growth Areas (see Table 5-5).

Table 5-5: Offset requirements for Natural Temperate Grassland, Striped Legless Lizard and Golden Sun Moth[4]

MNES	Area offset within the Northern and/or Eastern Conservation Areas (ha)[5]	Offsets to be delivered external to the NGGA (ha)	Total offset requirement (ha)
Natural Temperate Grassland	5.5 ha	15.5 ha	**21 ha**
Known habitat for Striped Legless Lizard	50.5 ha	291.5 ha	**342 ha**
Known habitat for Golden Sun Moth	82 ha	424 ha	**506 ha**

OFFSETS FOR VICTORIAN GRASSLAND EARLESS DRAGON

Due to the unique nature of Victorian Grassland Earless Dragon, the Plan takes a different approach to offsets for the species that integrates both direct land based offsets within the Northern Conservation Area as well as other compensatory measures. The aim of this approach is to provide for the best outcomes for Victorian Grassland Earless Dragon in the context of both the current priorities for its recovery and the scientific uncertainty that exists around the species.

In addition to protecting Striped Legless Lizard and Golden Sun Moth populations, the Northern Conservation Area will lead to the protection of 81 ha of habitat potentially important for the recovery of VGED (noting there is additional mapped habitat on 135 Staceys Road in the Northern Conservation Area which may have been lost, and is the subject of ongoing compliance investigation). While not an identified priority at the time of finalising the Plan, the Northern Conservation Area provides a potential future opportunity for reintroducing the species into the wild. The reserve will be managed in a way that is appropriate for the species (e.g. suitable biomass management) and is likely to be of a sufficient size to support a viable population of Victorian Grassland Earless Dragon. Management practices that will be

[4] Note that offset requirements have been rounded to manage minor data discrepancies. The total offset areas have been rounded up to the nearest whole number, and the area of offset delivered within the NGGA has been rounded down to the nearest half decimal.

[5] Note that the offset areas delivered in the Northern Conservation Area exclude mapped habitat on 135 Staceys Road. This property is the subject of an ongoing compliance investigation. The external offset requirement has been increased accordingly.

implemented for Striped Legless Lizard and Golden Sun Moth will also be beneficial for Victorian Grassland Earless Dragon.

In addition to the direct offsets, the City commits to establishing and funding an independently governed trust that will make an important contribution to the recovery efforts for Victorian Grassland Earless Dragon. The City, as the strategic assessment approval holder, will pay an agreed capped contribution of $12.7 million into the Trust over the life of the EPBC Plan (30 years). This will include:

- An upfront payment of $1 million upon establishment of the Trust
- Followed by annual contributions to reach a cumulative total of $12.7 million over the life of the EPBC Plan

Expenditure of the Trust will be guided by an expert technical advisory committee, and be focused on supporting key recovery actions for the species including activities such as:

- Securing, managing and monitoring the Victorian Grassland Earless Dragon rediscovery site
- Identifying, securing, managing, and monitoring additional habitat for the species
- Facilitating reintroduction of the species into managed sites
- Preventing further decline of potential suitable habitat
- Increasing knowledge of the species, emerging threats and conservation requirements

The key recovery actions will be consistent with the species policy advice (EPBC Conservation Advice and Recovery Plan), the Conservation Action Plan (Zoo's Victoria), or any superseding documents as relevant.

A VGED strategy to guide implementation will be prepared as part of establishing the Trust. The strategy will be provided to the Commonwealth Minster for the Environment for approval, and will be informed by species experts and current conservation advice and plans including the:

- The Conservation Advice for *Tympanocryptis pinguicolla* (Victorian grassland earless dragon) (DCCEEW, 2023a)
- The Draft National Recovery Plan for Four Grassland Earless Dragons (*Tympanocryptis* spp.) of Southeast Australia (DCCEEW, 2023b)
- The VGED Conservation Action Plan (Zoos Victoria, 2024)

5.6.5 IMPLEMENTATION OF OFFSETS FOR IMPACTS IN THE GROWTH AREAS

The City will coordinate offset delivery on behalf of developers which will help ensure that the offsets are delivered successfully and in a strategic manner. This will be funded under the Plan's funding framework (see Chapter 7.3.6).

STRATEGIC LANDSCAPE CONSIDERATIONS

In order to ensure offset sites are appropriate and contribute to the strategic benefit of the offset package, the City will develop strategic landscape criteria to guide the targeting of land suitable for strategic offsets. These criteria will consider:

- Protecting areas of habitat that would be considered large for each MNES
- Locating offsets within key biodiversity corridors to improve connectivity across the landscape
- Connections to existing conservation reserves

TIMING OF DELIVERY

The Plan includes a commitment to ensure that the delivery of offsets remains ahead of the rate of impacts over the life of the Plan. This commitment is important to help maximise the benefits of the strategic approach to offsets and deliver a conservation outcome that improves or maintains the viability of each MNES. To help deliver the commitment, the rate of impacts and offsets in the NGGA will be tracked as set out in Commitments and Measures document.

In the case that the rate of offsets is not ahead of the rate of impacts, a set of contingency steps (as set out in Commitments and Measures document) will be applied.

SECURING OFFSET SITES

A description of how the Northern Conservation Area and the Eastern Conservation Area will be secured is provided in Section 5.4.3.

Offset sites outside the NGGA will be secured under in-perpetuity, on-title agreements consistent with the security requirements of the *Guidelines for the removal, destruction or lopping of native vegetation* (DELWP, 2017c). An offset management plan will be prepared for each site and landholders will report annually on management actions in accordance with the requirements of these guidelines (DELWP, 2017c). These mechanisms:

- Provide for the in-perpetuity protection of sites
- Are accepted by NEPA as appropriate mechanisms for EPBC offsets
- Facilitate the necessary management, monitoring and reporting to ensure a conservation gain for each MNES

Surveys by an appropriately qualified ecologist using relevant survey techniques will be undertaken for each site prior to it being secured. Only sites with confirmed values for each MNES will contribute to meeting the offset requirements.

Delivery of offset sites will be coordinated by the City. Securing offsets is the responsibility of the City, unless the City agrees to accept a works in kind, land in kind, or offset from a development proponent. The in kind contribution would be limited to certain circumstances to ensure commitments for offsets under the Plan can be effectively delivered. These circumstances are set out in the Funding Program. The City may choose to accept the delivery of works, land or offsets by a development proponent provided that:

- The works, land or offsets constitute projects that are funded by the Levy
- The City is satisfied that the timing of the delivery of the land or offsets is consistent with priorities in the Plan
- The condition of the land is to the satisfaction of the City
- The works are permanent. Temporary works will not be accepted as works in kind
- The development proponent complies with all applicable requirements of the City, including tendering, documentation, supervision, and other related requirements
- Offsets must be provided to the satisfaction of the City and fulfil the following criteria:
    - Secured in perpetuity.
    - Align with the offsets identified in the Plan and not already provided by another party
    - Include a conservation management plan to outline the values on site and how the values will be improved overtime and conservation advice for the requisite species
    - Need to meet the strategic landscape considerations outlined in the Plan (set out above) and be in accordance with guidelines published by the City
- There must be no negative financial impact on the Funding Program implementation to the satisfaction of the City

Offsets consistent with the Plan will be counted as a contribution (in hectares) to the area requirement for offsets to be delivered under the Plan.

ESTABLISHING AND FUNDING THE VICTORIAN GRASSLAND EARLESS DRAGON TRUST

The City will establish the Victorian Grassland Earless Dragon Trust and be responsible for ensuring that the required funding is provided over the life of the Plan.

ADDITIONAL OFFSETS FOR PROCESS BASED DEVELOPMENT

Development within the portion of Heales Road East subject to process based development (as shown in Figure 4-1 of the Plan) and external infrastructure development is subject to an additional offset process in accordance with Commitment 21.

This process is described in Chapter 6 and includes the requirement for the development project to offset any unavoidable clearing in accordance with the EPBC Act Environmental Offsets Policy (DSEWPC, 2012) and associated Offsets Assessment Guide (or equivalent). Offsets will be secured prior to the commencement of works and will be secured and managed in accordance with the eligibility, security, and offset management requirements of the *Guidelines for the removal, destruction or lopping of native vegetation* (DELWP, 2017c).

6 Process based development

6.1 INTRODUCTION

Under the Plan, some development is subject to an additional process prior to development occurring. This is required because there is some uncertainty around the timing, location, and/or extent of impacts of the development. This process based development is required for (see Figure 4-1):

- Development within specific locations within the Heales Road East precinct
- External infrastructure development

This Chapter describes the reasoning and requirements for process based development under the Plan.

6.1.1 HEALES ROAD EAST PROCESS BASED DEVELOPMENT

Heales Road East is one of three precincts within the NGGA (see Figure 1-3). A large portion of the Heales Road East precinct was not subject to the on-ground surveys that were undertaken across the Growth Areas to inform the assessment undertaken in the SAR. Surveys were not possible due to access constraints in the smaller, privately owned land holdings that occur across a large portion of the precinct. At the time of preparing the Plan, these areas within the Heales Road East precinct were zoned as Rural Living Zone (RLZ) under the Greater Geelong Planning Scheme which allows for a mix of residential and rural land uses. One small portion of the area was zoned as Public Use Zone 1 (PUZ1) for service and utility activities.

Parts of the Heales Road East precinct have been identified for future investigation of residential or employment development in the Framework Plan (the future investigation areas in Heales Road East). These future investigation areas are not likely to be subject to precinct planning and development until late in the life of the Plan, and significant portions of this land may remain as rural living and not be subject to development at all in the life of the Plan. The future investigation areas in Heales Road East are therefore subject to a high level of uncertainty as:

- Current environmental values including the occurrence of MNES have not been confirmed on ground
- Given the land use at the time of preparing the Plan (smaller, intensively used properties), it is likely that the predicted presence of MNES in these areas is overly precautionary (i.e. predicts more value than actually occurs) and does not reflect the actual biodiversity values that are present
- Some areas may not be subject to development within the life of the Plan

Due to this uncertainty the Plan includes requirements for process based development within the future investigation areas in Heales Road East which will need to be met if development under the Plan in these areas is to be undertaken (see Section 6.3). This will ensure that development will appropriately avoid, minimise, mitigate, and offset any residual impacts to MNES within these areas. These areas are identified in Figure 4-1 as 'Heales Road East process based development'.

In addition, the City is exploring the option of applying an Environmental Significance Overlay to the future investigation areas in Heales Road East in order to help ensure any biodiversity values that are currently present are appropriately protected prior to any process based development proposals being put forward.

6.1.2 EXTERNAL INFRASTRUCTURE DEVELOPMENT

External infrastructure development may occur outside the Growth Areas within the Strategic Assessment Area. This development is limited to the supporting infrastructure and services class of actions and the environmental management class of actions (see Sections 4.3.4 and 4.3.5).

External infrastructure development is required to support and facilitate the urban development within the Growth Areas and help deliver the development objectives of the Framework Plan. Planning for external infrastructure development for the Growth Areas is in various stages and the specific locations and the types of external infrastructure that will be needed are not yet known.

The Plan shows indicative locations where external infrastructure development is intended to occur (see Figure 4-1). These include:

- Corridors along Staceys Road, Bacchus Marsh Road, Anakie Road, Midland Highway, and Evans Road to facilitate road and intersection upgrades
- Corridors adjacent to Cowies Creek and Tower Hill Drive to facilitate shared trail upgrades
- Stormwater related infrastructure associated with Hovells Creek, Elcho Road drain and Wharf road outfall
- The North Western Recycled Water Centre at 795-865 Anakie Road

These indicative locations have not been surveyed and the biodiversity values of these areas is not confirmed.

While the specific locations and potential impacts of external infrastructure are not yet confirmed, the Plan includes requirements for process based development which will need to be met if undertaking external infrastructure development under the Plan (see Section 6.3). This will ensure that external infrastructure development will appropriately avoid, mitigate, and offset any residual impacts to MNES.

6.2 APPROVAL CONTEXT FOR PROCESS BASED DEVELOPMENT

Development within the portion of Heales Road East subject to process based development and external infrastructure development will only be approved under Part 10 of the EPBC Act where:

- The Plan is endorsed under Part 10 of the EPBC Act
- Relevant classes of actions are approved under Part 10 of the EPBC Act
- The development is undertaken in accordance with the requirements of Section 6.3 of the Plan

6.3 REQUIREMENTS FOR PROCESS BASED DEVELOPMENT

Development within the portion of Heales Road East subject to process based development and external infrastructure development can only be undertaken under the Plan where it meets the following requirements:

1. The development must:
   a. Meet any Part 10 approval conditions issued under the EPBC Act
   b. Not prevent the achievement of any objectives, outcomes or commitments of the Plan
   c. Be located:
      i. Within the portion of Heales Road East identified in Figure 4-1 as 'Heales Road East process based development', or
      ii. For external infrastructure development, located outside of the Growth Areas within the Strategic Assessment Area
2. For development within the portion of Heales Road East subject to process based development, the action must be included in the classes of actions defined in Section 4.3 of the Plan
3. For external infrastructure development, the action must be essential infrastructure designed to service and support development within the Growth Areas and be included in the supporting infrastructure and services class of actions or the environmental management class of actions as defined in Sections 4.3.4 and 4.3.5 of the Plan
4. The development must also be:
   a. Consistent with the Standards for Process Based Development (see Section 6.3.1)
   b. Achieve the avoidance, mitigation and offset commitments (and associated measures) for process based development (see Table 6-1)

6.3.1 STANDARDS FOR PROCESS BASED DEVELOPMENT

The City will prepare Standards for Process Based Development (the standards). The standards will inform any proponents wishing to undertake development within the portion of Heales Road East subject to process based development or external infrastructure development of their obligations.

The standards will be developed within the first twelve months of implementation of the Plan and will be developed in consultation with NEPA and DEECA. As part of developing the standards, the referral process, and roles and responsibilities for process based development will be defined.

No process based development will be approved prior to development of the standards.

The standards will include the following:

- The requirements for process based development (see above)
- Clear instructions and standards for the avoidance, mitigation and offsetting of impacts (as outlined in Sections 6.5 to 6.7 below). This will include (where relevant) preparation and implementation of a CMP, and offset requirements for residual impacts to MNES, including reporting for the life of the offset
- Information that will need to be provided in a technical report prepared by the proponent, detailing how the requirements for process based development have been met

The technical report prepared by the development proponent, which describes how the requirements in the standards have been met, will be referred to the City's Project Manager for the Plan, and subsequently referred to other parties in accordance with the standards.

If the development is not consistent with the standards for process based development, development approval will not be granted by the City and the proponent will be required to seek an independent approval under Parts 7-9 of the EPBC Act.

The standards will be updated (in consultation with NEPA and DEECA) as required throughout implementation of the Plan as part of the Plan's adaptive management process under the MERI framework (see Section 7.5.4). This will ensure that avoidance and offsetting requirements in the standards are kept current and incorporate any new listings or updated policy advice.

6.4 COMMITMENTS FOR PROCESS BASED DEVELOPMENT

The Plan's commitments for process based development are provided in Table 6-1. See the Commitments and Measures document for measures relating to process based development .

Table 6-1: Commitments for process based development

No.	Commitment
3	Development within the portion of Heales Road East subject to process based development (as shown in Figure 4-1 of the Plan) and external infrastructure development will only proceed if undertaken in accordance with the requirements for process based development in Section 6.3 of the Plan
19	Development within the portion of Heales Road East subject to process based development (as shown in Figure 4-1 of the Plan) will be designed and located to prioritise avoidance of impacts to MNES and native vegetation. This must ensure that any confirmed population or occurrence of MNES that would be considered important or notable (for instance, due to size, condition or potential contribution to the recovery of the MNES) is avoided and subsequently protected, maintained and managed to ensure the persistence of that population or occurrence in the long-term. Impacts to all other populations or occurrences will be avoided and minimised as far as practical

No.	Commitment
20	External infrastructure development will be designed and located to prioritise avoidance of impacts to MNES and native vegetation. The following specific avoidance outcomes will be delivered: • Spiny Rice-flower – any confirmed population or part of the population must be avoided and will be protected, maintained and managed to ensure the persistence of that population in the long-term • Victorian Grassland Earless Dragon - any confirmed population or part of the population must be avoided and will be protected, maintained and managed to ensure the persistence of that population in the long-term; and the recovery team will be notified • Other MNES – any confirmed population or occurrence that would be considered important or notable (for instance, due to size, condition or potential contribution to the recovery of the MNES) must be avoided and will be protected, maintained and managed to ensure the persistence of that population or occurrence in the long-term. Impacts to all other populations or occurrences will be avoided and minimised as far as practical
13	Standard mitigation measures will continue to be implemented to minimise the indirect impacts of the development on MNES in accordance with the requirements of the *Greater Geelong Planning Scheme* (The City of Greater Geelong, 2022), as updated from time to time, and generally in accordance with the Framework Plan (The City of Greater Geelong, 2021)
21	Unavoidable clearing of any areas confirmed to support MNES due to development within the portion of Heales Road East subject to process based development (as shown in Figure 4-1 of the Plan) or external infrastructure development will be offset in accordance with the EPBC Act Environmental Offsets Policy and associated Offsets Assessment Guide (or equivalent) (Commonwealth of Australia, 2012; DSEWPC, 2012b)

6.5 AVOIDANCE AND MINIMISATION OF IMPACTS

The Plan includes commitments to design and locate process based development to ensure the development does not have unacceptable impacts on MNES and avoids and minimises impacts to relevant matters (see Table 6-1).

The commitments requires that any confirmed population of Spiny Rice-flower, Victorian Grassland Earless Dragon, and/or other MNES that are considered important or notable are to be avoided and protected to ensure the persistence of those populations in the long-term, and that impacts to all other populations will be avoided and minimised as far as practical.

This avoidance process will be undertaken by the proponent of each development project as part of the standard planning and detailed design phase of each project. Specific measures that set out the avoidance process are detailed in the Commitments and Measures document and will be included in the Standards for Process Based Development. The avoidance process will include:

- Undertaking targeted surveys prior to development in accordance with relevant survey guidelines, to inform the detailed design of each project and the avoidance and minimisation that is proposed to occur
- Providing a report to the Executive Leadership Group that demonstrates avoidance and minimisation outcomes in accordance with the requirements for process based development
- Preparing and implementing Conservation Management Plans for any populations of MNES avoided to ensure appropriate management of these populations and address potential indirect impacts from the infrastructure

The proponent of the project will be responsible for preparing the report to the Executive Leadership Group and preparing and implementing Conservation Management Plans in accordance with the Standards for Process Based Development (see Section 6.3.1).

6.6 MITIGATION OF IMPACTS

Process based development will be subject to mitigation through the Victorian planning system as per Commitment 13. This will deliver a range of standard mitigation measures through the PSP process, existing provisions in the Greater Geelong Planning Scheme, and the planning permit process, which will address the potential indirect impacts of development, including stormwater management, erosion control, and management of construction sites.

The preparation and implementation of Conservation Management Plans for any populations of MNES avoided will also address and manage specific potential indirect impacts associated with the development on MNES, including the spread of weeds, fire regimes, removal of rocks or other habitat features and inappropriate road maintenance works such as slashing, grazing, clearing, herbicide application, and soil disturbance from vehicle traffic. These specific requirements will be detailed in the Standards for Process Based Development that will be prepared by the City.

6.7 OFFSETS FOR RESIDUAL IMPACTS

The Plan includes a commitment to offset any unavoidable clearing associated with process based development for any areas confirmed to support MNES (see Table 6-1).

Unavoidable clearing will be offset in accordance with the EPBC Act Environmental Offsets Policy (DSEWPC, 2012) and associated Offsets Assessment Guide (or equivalent). Offsets will be secured prior to the commencement of works and will be secured and managed in accordance with the eligibility, security, and offset management requirements of the *Guidelines for the removal, destruction or lopping of native vegetation* (DELWP, 2017c).

The proponent of each development will be required to prepare a report for the Executive Leadership Group that describes how any offset requirements have been met as per the Standards for Process Based Development (see Section 6.3.1). This will include the sourcing, securing and managing offsets in accordance with the guidelines.

7 Assurance and implementation framework

7.1 INTRODUCTION

The Plan includes an assurance and implementation framework that has been developed to support successful delivery of the Plan. The framework is comprised of the following elements:

- Governance
- Funding
- MERI (monitoring, evaluation, reporting and improvement)
- Compliance
- Data management
- Processes for changing the Plan and implementation documents

The Plan's assurance and implementation framework includes a range of commitments which are set out and described throughout this Chapter. The framework will be implemented through a detailed set of measures.

7.2 PURPOSE OF THE ASSURANCE AND IMPLEMENTATION FRAMEWORK

The purpose of the assurance and implementation framework is to ensure implementation of the Plan:

- Complies with the Commonwealth approval conditions
- Efficiently and effectively delivers the Plan's conservation framework and the conservation program in the BCS
- Is transparent and accountable

7.3 GOVERNANCE FRAMEWORK

7.3.1 CONTEXT

Governance is defined for the Plan as the structures, mechanisms and processes for implementing the Plan.

Governance is a key part of the Plan's assurance and implementation framework. It will ensure the objective and outcomes of the Plan are achieved, and the commitments and measures are efficiently and effectively implemented.

7.3.2 COMMITMENTS FOR GOVERNANCE

The Plan's commitments for governance are provided in Table 7-1.

Table 7-1: Commitments for governance

No.	Commitment
22	Governance arrangements will be established to implement the Plan, consistent with the Plan's governance framework
23	A Stakeholder Engagement Strategy will be developed to guide engagement with key stakeholders on implementation of the Plan

7.3.3 GOVERNANCE STRUCTURE

The overall governance structure for implementing the Plan is shown in Figure 7-1. The governance structure addresses the key elements needed for successful delivery of the Plan, namely:

- Regulatory oversight
- Decision-making
- On-ground delivery and implementation
- Stakeholder interests and perspectives
- A dispute resolution process

The governance structure includes the following parties:

- The independent national environmental regulator which is the National Environmental Protection Agency (NEPA)
- The approval holder which is the City of Greater Geelong
- The Victorian Government Department of Energy, Environment and Climate Action (DEECA)
- Victorian Government Department of Transport and Planning (DTP)
- A Strategic Assessment Executive Leadership Group
- A Strategic Assessment Implementation Group
- A Strategic Assessment Project Working Group
- Support partners
- A process of ongoing-stakeholder engagement

REGULATOR: NATIONAL ENVIRONMENTAL PROTECTION AGENCY

NEPA is the independent national environmental regulator for the Commonwealth approval of the Plan under Part 10 of the EPBC Act. NEPA works with the Commonwealth Minister for the Environment (the Minister) who is responsible for making final project approval decisions.

Key matters that NEPA or the Minister is responsible for in relation to the Plan are:

- Endorsement of the Plan under the EPBC Act
- Approval of actions or classes of actions in accordance with the endorsed Plan and setting conditions of approval
- Ensuring the City, as approval holder, complies with the Commonwealth approval conditions
- Monitoring compliance in relation to the City's implementation of the Plan

APPROVAL HOLDER: CITY OF GREATER GEELONG

The City of Greater Geelong will be the approval holder for the Plan. As approval holder, the City is responsible for:

- Ensuring the Plan's outcomes are achieved and implementing the commitments and measures
- Ensuring regulated third-parties who undertake an approved action or any part of an approved action under the endorsed Plan take these actions in accordance with the Plan and implementation documents and with the Commonwealth approval conditions
- Taking reasonable steps to ensure regulated third-parties:
  - Are informed of any relevant requirements of the endorsed Plan and Commonwealth approval conditions that regulates or restricts the way in which the action is taken
  - Comply with the endorsed Plan and Commonwealth approval conditions
- Notifying NEPA of any known non-compliances with conditions by third parties

In implementing the commitments and measures, key roles of the City include:

- Giving effect to the Plan's requirements through the Victorian planning system, including through amendments to the Greater Geelong Planning Scheme and the preparation of PSPs and the permit application process
- Protecting and managing the Northern Conservation Area, Eastern Conservation Area, and the Cowies Creek Conservation Area

- Delivering the offsets needed to meet Commonwealth requirements
- Implementing the MERI framework, including reporting on progress in implementing the Plan

Victorian Government Department of Energy, Environment and Climate Action

DEECA is the Victorian regulator for approvals under the native vegetation regulations. DEECA reports to several Ministers, including the Victorian Environment Minister.

DEECA or the relevant Victorian Minister is responsible for the preparation of section 69 agreements under the *Conservation Forests and Lands Act 1987* that will be used to secure some offsets, and monitoring and enforcing compliance with the agreements.

DEECA will also provide input into the Standards for Process Based Development through consultation with the City (see Section 6.3.1).

Victorian Government Department of Transport and Planning

DTP is the Victorian regulator for approvals under the Victorian planning system. DTP reports to several Ministers including the Planning Minister.

DTP or the relevant Minister is responsible for authorising planning scheme amendments to give effect to the Plan.

Strategic Assessment Executive Leadership Group

The City will establish the Northern and Western Geelong Growth Areas Strategic Assessment Executive Leadership Group (the Executive Leadership Group) as the primary body responsible for overseeing and making decisions about the implementation of the Plan.

The City will prepare Terms of Reference (ToR) to set out the purpose, responsibilities, membership and decision-making processes for the Executive Leadership Group.

Roles and responsibilities

Key responsibilities of the Executive Leadership Group are:

- Oversight to ensure compliance with the Commonwealth approval conditions
- Achievement of the Plan's outcomes and implementation of the Plan's commitments
- Overseeing processes to secure and protect avoided land and offsets
- Overseeing funding arrangements and appropriate resourcing to implement the Plan
- Consultation with NEPA in relation to non-compliance

Members

The Executive Leadership Group will be comprised of:

- CEO, City of Greater Geelong (Chair)
- Director, Placemaking (or equivalent position), City of Greater Geelong
- Director, City Infrastructure (or equivalent), City of Greater Geelong
- Director, Corporate Services (or equivalent), City of Greater Geelong
- Manager, Planning and Growth (or equivalent position), City of Greater Geelong
- Coordinator Sustainability and Environmental Planning (or equivalent position), City of Greater Geelong
- Coordinator Planning Delivery (or equivalent position), City of Greater Geelong

Strategic Assessment Implementation group

The City will establish a Strategic Assessment Implementation Group as the primary body responsible for day-to-day implementation of the Plan. The Director, Placemaking (or equivalent position) will be responsible for establishing the Implementation Group. The group will be led by the Manager, Planning and Growth (or equivalent position).

Roles and responsibilities

Key responsibilities of the Implementation Group are:

- Monitoring and reporting on compliance with the Commonwealth approval conditions
- Co-ordinating the implementation of the Plan, including delivery of the commitments and measures set out in this document and the BCS
- Setting the strategic direction and priorities for implementing the Plan
- Financial management of funds from levies for the purpose of offsets and land acquisition
- Reviewing and approving working arrangements with support partners
- Implementing the MERI program consistent with the Plan's MERI framework
- Implementing the compliance program consistent with the Plan's compliance framework
- Managing contracts needed to implement the Plan
- Preparing annual reports for consideration by the Executive Leadership Group
- Secretariat support for any Stakeholder Reference Group that is established
- Liaising with NEPA on the Commonwealth approval conditions and other implementation issues
- Reviewing process based development and ensuring relevant requirements have been met as per the Standards for Process Based Development (see Section 6.3.1)

Members (including but not limited to)

- Manager Planning & Growth (or equivalent position), City of Greater Geelong
- Project Manager Geelong Strategic Assessment (or equivalent position), City of Greater Geelong
- Manager City Development (or equivalent position), City of Greater Geelong
- Manager Parks & Natural Assets (or equivalent position), City of Greater Geelong
- Project Manager Northern & Western Geelong Growth Areas (or equivalent position), City of Greater Geelong
- Chief Financial Officer (or equivalent position), City of Greater Geelong
- Coordinator Sustainability & Environmental Planning (or equivalent position), City of Greater Geelong
- Coordinator Planning Delivery (or equivalent position), City of Greater Geelong

Reporting line

The Implementation Group reports to the Executive Leadership Group.

Strategic Assessment Project Working Group

The City will establish an internal Project Working group to ensure integration between the Planning & Environment Act approvals and EPBC Act commitments and measures.

Support partners

Several support partners will assist with the implementation of the Plan.

Key support partners and their potential roles and responsibilities are set out in Table 7-2.

The City will consider establishing formal agreements with key support partners to formalise roles and responsibilities. The Strategic Assessment Implementation Group will be responsible for deciding on the need for formal agreements with support partners and establishing agreements within 6 months of Plan endorsement.

Table 7-2: Potential roles and responsibilities of support partners

Support partner	Potential role	Explanation
Agriculture Victoria	Administer and enforce the *Catchment and Land Protection Act 1994*	Landholders are required to take all reasonable steps to manage declared noxious weeds and pest animals, including on potential future offset sites under the Plan

Support partner	Potential role	Explanation
Corangamite CMA	Oversee development that occurs on a floodplain or over a waterway and the management of waterways	The CMA will play a role in ensuring development does not adversely impact floodplains and waterways in the Plan area, including through the authorisation of works over designated waterways in the Plan area
		The City will collaborate with the CMA in relation to the management of waterways within the Plan area, including the measures relating to Commitment 15 (preparation of studies and guidelines for the Hovells Creek and Moorabool River catchments)
Country Fire Authority (CFA)	Advise and assist with fire prevention and planning in the Growth Areas	The City will collaborate with the CFA in relation to fire prevention and planning in the Growth Areas, including the management of the two NGGA Conservation Areas and Cowies Creek Conservation Area
Trust for Nature	Prepare agreements for covenants under the *Victorian Conservation Trust Act 1972*, and monitor and enforce compliance with the agreements	Trust for Nature covenants may be used to secure some Commonwealth and Victorian offsets under the Plan
Private landholders	Private landholders may enter into on-title security agreements to secure their land for offsets under the Plan	Most offsets under the Plan are likely to remain in private ownership and will be secured and managed under on-title security agreements
Wadawurrung Traditional Owners Aboriginal Corporation (WTOAC)	Advise and assist with the management of Aboriginal heritage values and culture and land management of the two NGGA Conservation Areas and Cowies Creek Conservation Area	WTOAC is the statutory authority for the management of Aboriginal heritage values and culture

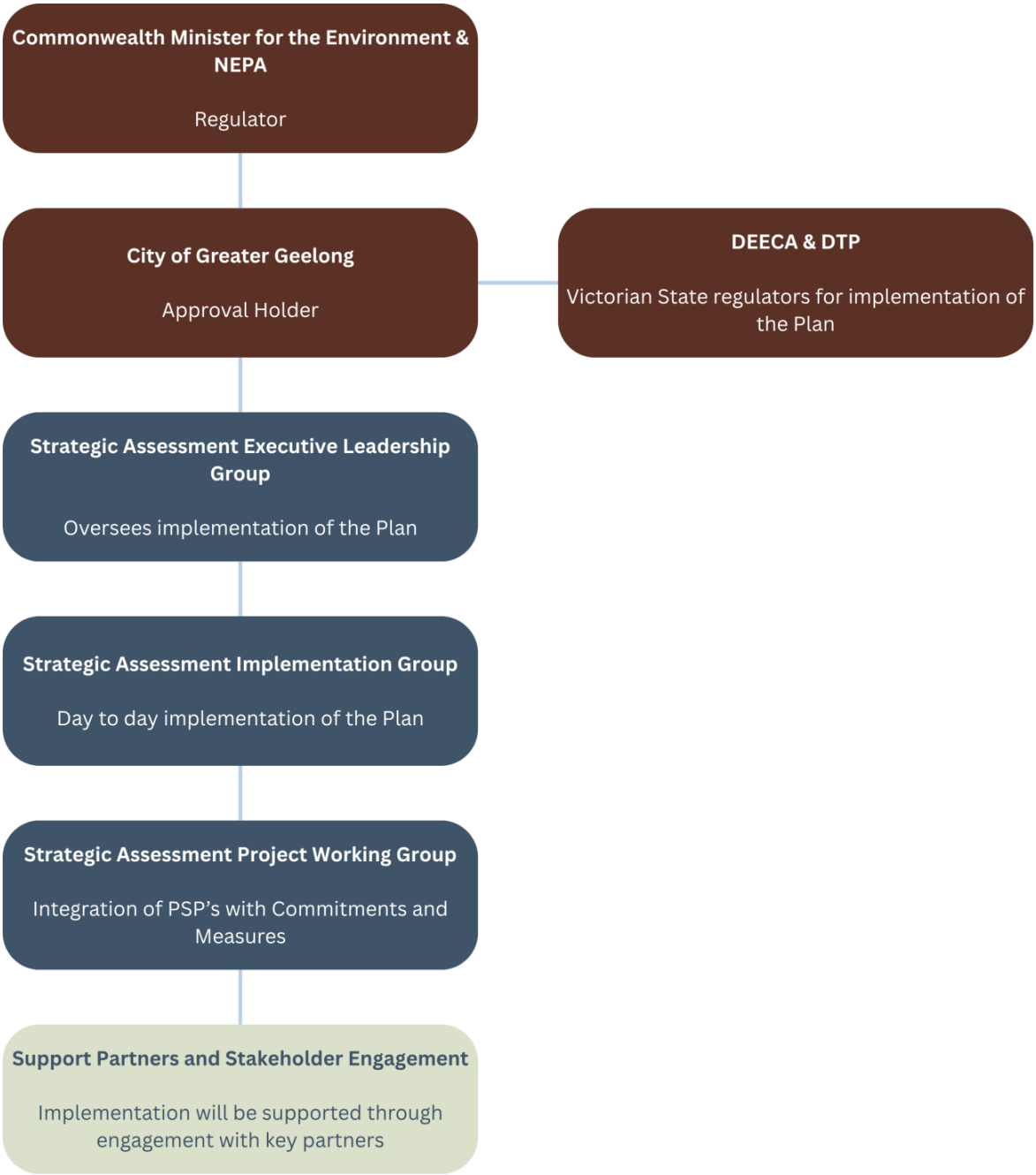


Figure 7-1: Governance structure for implementing the Plan

7.3.4 STAKEHOLDER ENGAGEMENT STRATEGY

The Endorsement Criteria in the Strategic Assessment Agreement requires that the Plan provide a process for stakeholder engagement, including with the Commonwealth (Attachment 2, Clause 4(b)(f)).

The Plan includes a commitment to develop a Stakeholder Engagement Strategy to guide the City in undertaking ongoing engagement with key stakeholders over the life of the Plan.

The Stakeholder Engagement Strategy will identify:

- Engagement objectives and principles
- Key stakeholders and their interests in the Plan
- Engagement processes and tools, including an implementation schedule
- How the results of engagement will be used to inform improvements to implementation of the Plan, including through the 5-yearly independent evaluation and assurance reviews (see Section 7.5)
- Reporting requirements on results of engagement to be included in annual progress reports

Several processes that will be used to implement the Plan through the planning system require stakeholder engagement, including the preparation of PSPs and planning scheme amendments. Engagement processes under the Plan will be aligned to these planning system processes to support efficient and effective engagement.

Table 7-3 sets out key stakeholders that will be included in the Stakeholder Engagement Strategy and their likely main interests in the implementation of the Plan.

Table 7-3: Key stakeholders that will be included in the Stakeholder Engagement Strategy and their likely main interests

Stakeholder	Likely main interests in the Plan
NEPA	• Acceptability of the impacts of the Plan on MNES • Compliance with Commonwealth approval conditions, including by regulated third-parties taking actions under the Plan • Protection and ongoing management of avoided land and offsets • Monitoring and reporting on progress in achieving the conservation outcomes of the Plan and implementing the commitments • Evaluation and adaptive management
DEECA	• The impacts of the Plan on State biodiversity values • Protection and ongoing management of avoided land and offsets • Implementation of the conservation framework through the Victorian planning system
DTP	• Land available for development in the Growth Areas • Implementation of development and the Plan through the Victorian planning system
Corangamite CMA	• Development over waterways • Management and protection of waterways and wetlands downstream from the Growth Areas, including Ramsar sites
Barwon Water	• Key infrastructure provider for the strategic assessment • Management of water infrastructure including water supply, sewage and stormwater
Developers	• Land available for development in the Growth Areas • Opportunities to use avoided land for recreation or water management • Offset liabilities • Levy fees and mechanisms • Other administrative requirements for development • Timeframes for development sequencing

Stakeholder	Likely main interests in the Plan
Wadawurrung traditional owners	• Avoidance and protection of Indigenous heritage values • Protection and ongoing management of avoided land and offsets
Environment and community interest groups	• Acceptability of the impacts of the Plan on MNES and State biodiversity values • Compliance with Commonwealth approval conditions • Protection and ongoing management of avoided land and offsets • Monitoring and reporting on progress in achieving the conservation outcomes of the Plan and implementing the commitments • Management of waterways and Ramsar sites • Compliance with Commonwealth approval conditions

7.3.5 GOVERNANCE MECHANISMS AND PROCESSES

The governance framework includes a range of mechanisms and processes to ensure effective and efficient implementation. These mechanisms and processes are incorporated into:

- A funding framework, including:
  - A mechanism to secure funds through a levy on development
  - Governance arrangements to administer the funds and make funding decisions
- A monitoring, evaluation, reporting and improvement (MERI) framework, including:
  - Monitoring protocols
  - Evaluation processes
  - Reporting requirements
  - A process for adaptive management
- A compliance framework, including:
  - Monitoring protocols as set out under the MERI program
  - A process to implement a risk-based approach to compliance action
  - Reporting requirements as set out under the MERI program

These are described in more detail in Sections 7.4, 7.5 and 7.6 respectively.

7.3.6 DISPUTE RESOLUTION

The governance framework includes a dispute resolution process to ensure any disputes that arise throughout implementation of the Plan are dealt with in a cooperative, timely and efficient manner. A dispute resolution process is also required under Section 10.3 of the Strategic Assessment Agreement between the City and the Minister.

Parties involved in implementation of the Plan include those which form part of the governance structure (see Section 7.3.3) and persons undertaking or seeking to undertake development (e.g. landholders). If a dispute arises between parties involved in implementation of the Plan, the following dispute resolution process should be taken:

- The relevant party/parties will give written notice of the dispute to the concerned party/parties which will specify the details of the dispute concerned. If the dispute arises between the City and the Minister, the written notice will state that it is a notice under clause 10.3 (a) of the Strategic Assessment Agreement
- Management representatives (being Executive Level 2 or equivalent for Government bodies), of each of the parties will endeavour in good faith to agree upon a resolution of the dispute
- Should management representatives fail to reach a resolution within 10 business days of receipt of a notice of dispute (or another timeframe agreed in writing between the involved parties), the dispute will be taken to Senior Executive Service (SES) or equivalent representatives of all involved parties
- SES representatives (or equivalent) will endeavour in good faith to agree upon a resolution of the dispute

- Should the SES representatives (or equivalent) fail to resolve the dispute within 10 business days (or other time frame agreed in writing between the parties), the dispute will be taken to the:
  - Relevant Deputy Secretary of the Environment Department (if the Minister is a relevant party), and/or
  - A relevant Chief Executive Officer or equivalent (for other involved parties)

The dispute resolution process will ensure that abandonment of the Plan and termination of the Strategic Assessment Agreement is only considered as a last resort.

7.4 FUNDING FRAMEWORK

7.4.1 CONTEXT

The Endorsement Criteria in the Strategic Assessment Agreement requires that the Plan describe the funding arrangements for implementation (Attachment 2, Clause 2(h)).

The City has prepared a Funding Program (consistent with the Funding Framework described in Section 7.4.3) to implement the Plan. The Funding Program will be implemented into the Greater Geelong Planning Scheme by inclusion as a mandatory requirement in the urban growth zone. All proponents undertaking development will need to fulfil the requirements of the EPBC Plan and funding contribution.

7.4.2 COMMITMENTS FOR FUNDING

The Plan's commitment for funding is provided in Table 7-4.

Table 7-4: Commitment for funding

No.	Commitment
24	Funding arrangements will be established to fund the implementation of the Plan's commitments and measures over the life of the Plan, consistent with the Plan's funding framework

All the commitments in the Plan will require funding over the life of the Plan. The key commitments that will require funding to protect MNES are those which relate to:

- Offset establishment, management, monitoring and audit
- Securing and managing the Northern Conservation Area, Eastern Conservation Area, and Cowies Creek Conservation Area
- Implementing conservation measures
- Implementing the MERI framework and compliance framework

The measures to deliver the Plan's Funding commitment are set out in the Commitments and Measures document.

7.4.3 FUNDING FRAMEWORK

The key elements of the funding framework are:

- Establishment of an implementation fund to fund the costs of implementing the commitments and measures, including securing and managing offsets for MNES required under the Plan in perpetuity
- Full recovery of the costs incurred by the City in implementing the commitments and measures, through a biodiversity levy payable by developers in the Growth Areas
- Establishment of governance and administrative arrangements to administer the implementation fund and the collection and application of the biodiversity levy

COST RECOVERY THROUGH A BIODIVERSITY LEVY ON URBAN DEVELOPMENT

The cost of implementing the commitments in the Plan and their associated measures will be fully cost-recovered from developers within the Growth Areas through a biodiversity levy.

The biodiversity levy will be calculated separately and structured differently for each growth area given the substantial difference in biodiversity values and impacts of development between the NGGA and the WGGA.

The biodiversity levy will be payable by developers within the Growth Areas on a per-hectare-of-developable-land basis. The biodiversity levy will be subject to indexation and adjustment over time to encompass any variation in the cost of implementation of the commitments and measures over the life of the Plan.

The Funding Framework includes the following elements which are described in detail in the Funding Program:

- The biodiversity levy area within the Growth Areas
- The basis upon which the biodiversity levy will be calculated, including indexation and adjustment
- The biodiversity levy amount payable in respect of each landholding within the biodiversity levy area
- The biodiversity levy events which will trigger the requirement to pay the biodiversity levy in respect of a landholding
- Any exemptions or exclusions from the biodiversity levy liability and from biodiversity levy events
- Confirmation that the biodiversity levy is only payable once in respect of a landholding within the NWGGA
- The requirement that prior to taking an action within the classes of actions described in this Plan and approved by the Minister, a person must seek the City's authorisation to proceed with that action subject to paying the biodiversity levy
- The governance and administrative processes by which the City will:
  - Notify developers of a biodiversity levy liability
  - Collect the biodiversity levy
  - Confirm when a biodiversity levy liability has been satisfied in respect of a landholding
  - Apply the biodiversity levy to fund the implementation of the commitments and measures in the Plan

It is noted that the City may choose to accept the delivery of works, land or offsets by a development proponent in lieu of cash payments towards the Levy liability, or request the provision of offsets by a development proponent in lieu of cash payments towards the Levy liability. The in kind contribution would be limited to certain circumstances to ensure commitments for offsets under the Plan can be effectively delivered (as set out in the funding program).

MECHANISM TO SECURE THE LEVY

Provided that this Plan is endorsed under Part 10 of the EPBC Act, and the Minister approves the classes of actions in accordance with the endorsed Plan, the Funding Program will provide the mechanism to impose, collect and apply the biodiversity levy.

ADMINISTRATION OF FUNDING

Governance arrangements for administration of the funding include:

- Application of an appropriate governance framework to guide decision making on the use of the funds
- Monitoring of compliance with payment of the biodiversity levy
- Annual progress reports that will include information on revenue and expenditure of funds
- Undertaking of compliance action where necessary to enforce compliance with biodiversity levy liabilities

7.5 MERI FRAMEWORK

7.5.1 CONTEXT

The Endorsement Criteria in the Strategic Assessment Agreement requires that the Plan address monitoring, including to ensure monitoring is used to understand the effectiveness of outcomes, commitments and measures and inform adaptative management, and to provide for a 5-yearly assurance review (Attachment 2, Clause 4(a)(ii and viii)).

MERI (monitoring, evaluation, reporting, and improvement) is a key component of the Plan's assurance and implementation framework. MERI provides a system for understanding how well the Plan is performing, communicating that to regulators and the public, and adapting implementation as needed. MERI can be considered as (DEWHA, 2009):

> *"a continuous cycle of participation and communication rather than as a single evaluation event. MERI promotes learning and adaptive management in response to progressive monitoring and evaluation which enables improvement in program design and achievement of desired outcomes"*

Strategic assessments represent complex, long term programs for managing both development and conservation. Ongoing decisions informed by a MERI framework over the life of the Plan are necessary to ensure successful implementation.

7.5.2 COMMITMENTS FOR MERI

The Plan's commitments for MERI are provided in Table 7-5.

Table 7-5: Commitments for MERI

No.	Commitment
25	A MERI program will be implemented over the life of the Plan, consistent with the Plan's MERI framework
26	A development registration system will be developed and implemented to track development under the EPBC Part 10 approval

7.5.3 PURPOSE OF THE MERI FRAMEWORK

The purpose of the MERI framework for the Plan is to:

- Provide transparency and accountability for implementation of the Plan
- Determine whether the:
  - Plan's objective and outcomes are being achieved
  - Plan's commitments to achieve the objective and outcomes are efficient and effective
  - Measures (set out in the Commitments and Measures document) are efficient and effective
- Enable new information over the life of the Plan to be assessed and integrated into implementation
- Adaptively improve implementation of the Plan where necessary to ensure the objective and outcomes are achieved

7.5.4 COMPONENTS OF THE MERI FRAMEWORK

The MERI framework for the Plan is comprised of the following components:

- Monitoring
- Evaluation
- Reporting
- Improvement (adaptive management)

The components of the MERI framework and how they fit together are shown (in green) in Figure 7-2.

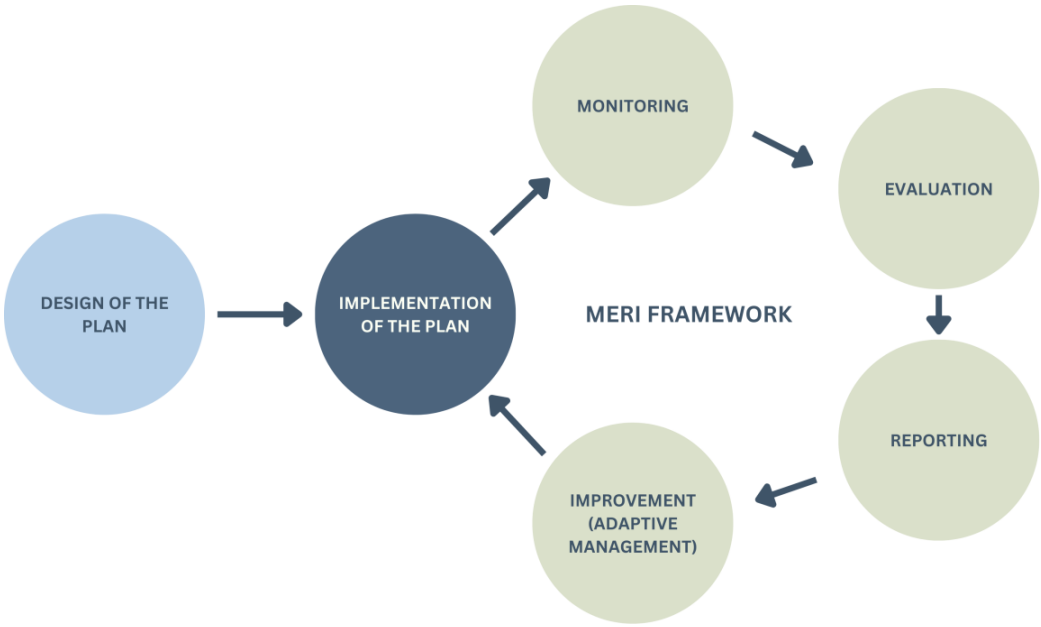


Figure 7-2: Components in the MERI framework for the Plan

MONITORING

Monitoring data will be collected and recorded over the life of the Plan.

Monitoring will be undertaken in relation to Key Performance Indicators (KPIs) and will involve:

- Developing monitoring protocols
- Collecting and recording monitoring data
- Tracking of actions through a development registration system

Key performance indicators

KPIs have been established for each outcome and commitment and are provided within the Commitments and Measures document. They will also be established for compliance with the Commonwealth approval conditions within 12 months of endorsement of the Plan. These will be added to the Commitments and Measures document once finalised.

KPIs provide a framework for understanding:

- If each outcome is being achieved and if not, the possible factors that are causing the outcome to not be achieved
- If each commitment is being delivered efficiently and effectively
- The extent of compliance with the Commonwealth approval conditions

The adequacy of KPIs will be reviewed as part of the Plan's five-yearly evaluation.

Monitoring protocols

Detailed monitoring protocols will be developed for each KPI that set out:

- What monitoring data will be collected
- How monitoring data will be collected
- Frequency of monitoring data collection
- Location of monitoring (for data related to environmental outcomes)

Table 7-6 identifies the three broad types of monitoring data that will be collected under the monitoring protocols, examples of the data collected, the timing for data collection, and how this data will be used.

Monitoring protocols will be established for each KPI within 12 months of endorsement of the Plan.

Table 7-6: Types of monitoring data that will be collected

Type of data	Examples of data collected	Timing for collecting data	Use of monitoring data
Implementation data	• Rate of development and impacts to MNES • Revenue and expenditure of funds • Planning scheme amendments • Gazettal of PSPs and NVPPs • Protection of avoided land (ha) • Retention of native vegetation through NVPPs (ha) • Establishment of offset sites (ha and biodiversity values protected) • Management plans and activities for offset sites or avoided land	Annually	Inform: • Tracking of offset delivery and impacts • Preparation of annual progress reports • Five-yearly evaluations
Environmental data	• Changes in condition and extent of native vegetation in avoided land and offset sites • Presence/absence of species • Changes to species populations	Annually to five-yearly depending on ecological considerations	Inform five-yearly evaluations
Compliance data	• Percent of PSPs consistent with Commonwealth approval conditions • Percent of permits with conditions consistent with Commonwealth approval conditions • Number of non-compliances with permit conditions relevant to Commonwealth approval conditions • Number of incidences of illegal removal of native vegetation not in accordance with NVPPs • Number of incidences of illegal development in conservation areas	Annually	Inform: • Preparation of annual progress reports • Five-yearly evaluations

Collecting and recording monitoring data

Monitoring data will be captured and recorded over the life of the Plan in accordance with the monitoring protocols.

A monitoring baseline will be established to set a reference point for tracking progress in implementing the Plan. The monitoring baseline will be established based on the first monitoring event for each outcome.

Monitoring data will be captured and maintained for each monitoring event in an appropriate data management system that will be established for the Plan, and that provides:

- A consistent format for storing data
- Ongoing access to monitoring data throughout the life of the Plan

Tracking of actions through a development registration system

The City will establish a development registration system for tracking development under the Part 10 EPBC Act approval (Commitment 26). The system will help ensure that:

- The City can monitor developments using the Part 10 approval (including process based development)
- Regulated third-parties (developers) are aware of their responsibilities under the Plan

The development registration system will:

- Use an appropriate step in the Victorian planning system as the trigger for registration
- Require developers to provide information to the City about their action, including how it is consistent with the requirements of the Plan
- Inform the offset delivery commitment to monitor the rate of offsets being delivered versus the rate of development

EVALUATION

Evaluation is the process of assessing the effectiveness of actions towards achieving a specific outcome. Evaluations will be undertaken at two scales throughout the life of the Plan (see Figure 7-3):

- Five-yearly evaluations
- End of Plan evaluation

Five-yearly evaluation and assurance review

An independent evaluation and assurance review will be undertaken every 5 years over the life of the Plan. The evaluation and assurance review will be undertaken by an independent party engaged by the City.

The five-yearly evaluation and assurance review will analyse:

- Compliance with the Commonwealth conditions of approval
- Whether the outcomes of the Plan are being achieved, and if not, the reasons for this
- Progress of the implementation of each commitment and an evaluation of how efficiently and effectively the commitments are being implemented

The five-yearly evaluation and assurance review will also make recommendations where appropriate for improving the implementation of the Plan. The evaluation will be the primary trigger point and basis for any necessary adaptive management of the Plan to ensure the outcomes of the Plan are achieved.

The evaluation and assurance review will be prepared based on:

- A set of Key Evaluation Questions for each type of evaluation (see Table 7-7)
- Performance against the KPIs for each outcome and commitment
- Monitoring data collected as part of the monitoring program

Draft Key Evaluation Questions for each main part of the evaluation and assurance review are provided in Table 7-7. These draft questions will be refined and finalised by the City prior to the first five-yearly evaluation.

The first five-yearly evaluation and assurance review will be undertaken within 12 months after the first full 5 years of implementation, and then within that timeframe every five years following this over the life of the Plan – at year 10, 15, 20 and 25 of the Plan's implementation.

The evaluation and assurance review results will be provided in the five-yearly assurance report.

Table 7-7: Draft Key Evaluation Questions

Evaluation type	Issue to address	Draft Key Evaluation Questions
Achievement of outcomes	Outcome progress	• To what extent are the Plan's outcomes being achieved? • What is the magnitude and rate of positive or negative change in outcomes? • Are changes occurring consistently across the Strategic Assessment Area?
	Contribution of the Plan	• To what extent were changes directly attributable to the Plan? • To what extent have the Plan's commitments been delivered? • Have there been any significant delays in delivering commitments that might affect the achievement of outcomes?
	Contribution of other factors	• What other factors might have influenced the achievement of the outcomes? • Did any environmental changes or ecological processes occur outside the control of the Plan that might influence outcomes? • Were similar trends observed outside the Plan area without interventions? • Were there any unexpected outcomes (positive or negative)?
	Program logic and design	• Are the relationships and assumptions in the outcomes framework linking measures to commitments to outcomes still valid? • Has the design and implementation of the MERI program, including monitoring protocols and KPIs, been adequate to measure changes?
Implementation of commitments	Efficiency	• Were commitments delivered within expected timeframes and within expected budgets? • Are the processes to implement commitments administratively efficient, including arrangements with delivery partners? • Are there alternative measures to deliver the commitments that are faster, less costly, or more administratively efficient to implement?
	Effectiveness	• To what extent are the Plan's outcomes being achieved? • Were commitments delivered according to the BCS? • Are the commitments the best way to achieve the outcomes of the Plan? What commitments contribute most and least? • Are there alternative measures that would more effectively deliver the commitments and/or achieve additional or multiple benefits? • Do the measures continue to meet best practice standards?

End of Plan evaluation

An independent end of Plan evaluation will be undertaken at the end of the life of the Plan. The end of Plan evaluation will be undertaken by an independent party engaged by the City.

The end of Plan evaluation will consider performance over the whole life of the Plan, drawing on information and the results of the five-yearly evaluations and assurance review and the monitoring program.

The evaluation will determine whether the Plan's:

- Objective was achieved
- Outcomes were achieved
- Commitments were implemented effectively and efficiently

The end of Plan evaluation will be undertaken within 12 months of the end of the Plan.

The end of Plan evaluation results will be provided in the final report for the Plan.

REPORTING

Reporting will be undertaken at the following points (see Figure 7-3):

- Annual progress reports
- Five-yearly assurance reports
- Adaptive management reports
- Final report for the Plan

Annual progress reports

Annual progress reports will be prepared to report publicly on compliance with the Plan and Commonwealth approval conditions and ensure transparency and accountability in implementing the Plan.

Annual progress reports will include information on:

- Progress in delivering the development in accordance with the Commonwealth approval conditions
- Progress in implementing the commitments
- Revenue and expenditure of funds to implement the Plan
- Any non-compliances with the Commonwealth approval conditions and any compliance actions taken

Annual progress reports will be prepared based on the monitoring data collected as part of the monitoring program.

The first annual report will be prepared and made publicly available within 6 months after the end of the first full financial year following commencement of implementation of the Plan, and then within that timeframe every year following this over the life of the Plan.

A draft of the annual progress report will be provided to the Executive Leadership Group for review and comment prior to being finalised for public release. The final annual progress reports will be made publicly available on the City's website.

Five-yearly assurance reports

Five-yearly independent assurance reports will present the results of the independent five-yearly evaluations and assurance review. The independent assurance report will include:

- Analysis and key findings on:
  - Whether the outcomes of the Plan are being achieved
  - How efficiently and effectively the commitments are being implemented
  - Extent of compliance with the Commonwealth conditions of approval
- Any recommendations for adaptively improving the implementation of the Plan, including compliance

The first five-yearly assurance report will be prepared and made publicly available within 12 months after the first full 5 years following commencement of implementation of the Plan, and then within that timeframe every five years following this over the life of the Plan.

A draft of the five-yearly assurance report will be provided to the Executive Leadership Group and NEPA for review and comment prior to being finalised for public release. As the assurance report is an independent report, comments will be limited to corrections or clarifications rather than the findings of the report.

The final five-yearly assurance reports will be made publicly available on the City's website.

Adaptive management reports

Within 3 months following completion of each draft five-yearly assurance report, the City will prepare an adaptive management report that includes recommendations for adaptive management actions for endorsement by the Executive Leadership Group. The adaptive management process is described in more detail below.

Final report for the Plan

The final report for the Plan will present the results of the end of Plan evaluation.

The final report will be prepared within 12 months of the end of the Plan.

A draft of the final report for the Plan will be provided to the Executive Leadership Group for review and comment prior to being finalised for public release. As the final report for the Plan is an independent report, comments will be limited to corrections or clarifications rather than the findings of the report.

The final report will be made publicly available on the City's website.

IMPROVEMENT (ADAPTIVE MANAGEMENT)

The improvement step of the MERI program provides the opportunity to adaptively manage implementation of the Plan to ensure that the objective and outcomes of the Plan are successfully achieved, and the commitments are delivered.

Adaptive management of the Plan may be needed because of new opportunities that arise to improve implementation, changes in economic and social conditions, local events such as fires, floods and disease affecting biodiversity, climate variation, and implementation or governance issues that need to be addressed.

Triggers for adaptive management

The independent five-yearly evaluation and assurance review will be the primary trigger point and basis for any necessary adaptive management of the Plan to ensure the outcomes of the Plan are achieved.

Adaptive management may also be triggered by the City on an ad hoc basis in response to issues or opportunities that arise and that need to be addressed immediately. This may include:

- New information relating to protected matters, such as:
  - New listings of species or threatened ecological communities (TECs)
  - The re-discovery of a previously considered extinct (in the wild) species
  - New knowledge that changes the understanding about a protected matter
- Changes to the legislative or policy context
- Changes to guidelines or standards relevant to a protected matter

Options for adaptive management

Options for adaptive management will vary according to the situation and will be determined on a case-by-case basis through the process set out in the section 'Process to decide adaptive management actions' (see below).

The broad categories of options that may be considered are provided in Table 7-8.

Table 7-8: Categories of options for adaptive management

Category	Potential circumstance for using the option
Change conservation priorities or scope	Where evidence demonstrates that the outcomes of the Plan are not being achieved or conservation commitments are not being delivered. This may include: • Changing the proposed location of, or protecting a new, conservation area • Improving mechanisms to protect a conservation area • Changing responsibilities for protecting a conservation area • Changing the management requirements for a conservation area
Change development priorities or scope	Where evidence demonstrates that development impacts may affect the outcomes of the Plan or development commitments are not being delivered. This may include: • Pausing development in a particular location where the establishment of offsets is not keeping pace with the impacts of the development • Removing areas for development

Category	Potential circumstance for using the option
Increase monitoring effort and evaluation frequency or undertaking new research	Where more information is needed on a specific issue to inform decision making
Change priorities or timing for implementing measures	Where evidence suggests a commitment or measure could be implemented earlier to achieve a better outcome
Change policy or guidelines relevant to the Plan	Where stakeholders need more clarity on the Plan or how it should be interpreted, policy issues affecting the delivery of commitments or measures are identified, or legislative changes are made that are relevant to the implementation of the Plan
Change mitigation or management standards relevant to the Plan	Where best practice standards relevant to mitigation of impacts or management of conservation areas change or new opportunities arise to improve practices
Change implementation processes or governance arrangements for the Plan	Where evidence suggests implementation processes or governance arrangements are inefficient or not effectively delivering commitments or measures

Process to decide adaptive management actions

Within 3 months following completion of each draft five-yearly assurance report, the City will prepare an adaptive management report that includes recommendations for adaptive management actions for endorsement by the Executive Leadership Group. Recommendations endorsed by the Executive Leadership Group will form the basis of the adaptive management program to be commenced over the following five-year implementation period of the Plan.

The adaptative management report by the City will be provided to the Executive Leadership Group along with the draft of the five-yearly assurance report. The adaptative management report will include:

- The City's response to any recommendations made in the five-yearly assurance report
- Recommendations for adaptive management actions for endorsement, including any recommendations made in the five-yearly assurance report and any other recommendations made by the City
- Any proposed changes to measures or other parts of the BCS to give effect to the recommendations
- Reasons why any recommendations in the draft five-yearly assurance report are not being recommended
- Costs of implementing the adaptive management actions any implications for funding arrangements
- Priorities for implementing adaptive management actions, including any urgent actions that need to be taken
- Timing for implementing adaptive management actions
- Any consultation with key stakeholders or expert advice sought to inform the adaptive management actions

The Executive Leadership Group may endorse the recommendations, not endorse the recommendations with reasons, or may suggest further actions are taken or further information sought to inform their decision.

The City will publish on the City's website at the same time as the final five-yearly assurance reports:

- A response to any recommendations made in the five-yearly assurance report
- The endorsed adaptive management actions and the proposed timing for implementation of these actions

Any changes to the measures or other parts of the implementation documents to reflect and give effect to the recommendations will be made within 12 months of endorsement of the recommendations.

7.5.5 IMPLEMENTATION OF THE MERI PROGRAM

Implementation of the MERI program involves the following steps which are repeated in a cycle (see Figure 7-2):

- Implementation of the Plan as endorsed by the Commonwealth Environment Minister
- Monitoring of implementation
- Evaluation of the success of implementation

- Reporting the results of the evaluations
- Improving implementation of the Plan (as required) by amending the measures in the implementation documents

Given the long timeframes of the Plan, application of the MERI program will occur at different times scales over the life of the Plan, as set out in Figure 7-3.

Figure 7-3: Application of MERI

7.6 COMPLIANCE FRAMEWORK

7.6.1 CONTEXT

The Endorsement Criteria for the Plan provided under the Strategic Assessment Agreement requires that the Plan ensure compliance with the Plan will be monitored and non-compliance reported (Attachment 2, Clause 4(a)(vii)).

This Chapter sets out the Plan's compliance framework, including:

- The commitment for compliance
- Purpose of the compliance framework
- Types of compliance and responsibilities
- Components of the compliance framework

7.6.2 COMMITMENTS FOR COMPLIANCE

The Plan's commitment for compliance is provided in Table 7-9. The measures to deliver this commitment are set out in the Commitments and Measures document.

Table 7-9: Commitment for compliance

No.	Commitment
27	A compliance program will be implemented over the life of the Plan, consistent with the Plan's compliance framework

7.6.3 PURPOSE OF THE COMPLIANCE FRAMEWORK

The purpose of the compliance framework is to:

- Support the Commonwealth who have responsibility for compliance under the EPBC Act
- Ensure the City delivers the commitments and achieves the outcomes of the Plan
- Support regulated third-parties (developers) to undertake approved actions under the endorsed Plan in accordance with the Commonwealth approval conditions

7.6.4 RESPONSIBILITIES FOR COMPLIANCE

There are two broad types of compliance relevant to implementing the Plan. They are compliance related to:

- Achievement of the Plan's outcomes and implementation of commitments by the City
- Regulated third-parties taking approved actions under the endorsed Plan

Responsibilities for these two broad types of compliance are set out in Table 7-10.

Table 7-10: Responsibilities for two types of compliance relevant to implementing the Plan

Compliance category	Responsible regulatory authority	Relevant regulatory framework
Achievement of outcomes and implementation of commitments	NEPA is responsible for monitoring compliance in relation to the City's implementation of the Plan NEPA can potentially take action to enforce compliance under the EPBC Act	Potential breach of EPBC Act

Compliance category	Responsible regulatory authority	Relevant regulatory framework
Regulated third-parties taking approved actions under the endorsed Plan	The City, as the approval holder, is responsible for ensuring that regulated third-parties understand their obligations in relation to the Plan and the Commonwealth approval conditions The City or other appropriate regulatory authority can potentially take action to enforce compliance under the regulatory frameworks used to implement the Plan, including the P&E Act	Potential breach of regulatory frameworks used to implement the Plan, including P&E Act

As approval holder, the City is responsible for ensuring regulated third-parties taking approved actions under the endorsed Plan understand their obligations to take these actions in accordance the Plan and implementation documents and with the Commonwealth approval conditions.

Where a regulated third-party undertakes an action or any part of an approved action under the endorsed Plan, the City will take reasonable steps to ensure that the regulated party:

- Is informed of any relevant requirements of the endorsed Plan and Commonwealth approval conditions that regulates or restricts the way in which the action is taken
- Complies with the endorsed Plan, implementation documents and Commonwealth approval conditions

The Plan's requirements will be delivered through several Victorian regulatory frameworks. The P&E Act is the primary regulatory framework for giving effect to the requirements of the Plan. Compliance for regulated third-parties will be undertaken in accordance with the compliance arrangements of these regulatory frameworks.

In many cases, the City will be the appropriate regulatory authority responsible for taking compliance action for a breach by a regulated third-party as many the Plan's requirements are being delivered through the planning system.

In some cases, there may be a breach of another regulatory framework with a different responsible regulatory authority. The City will work with that regulatory authority to ensure compliance.

7.6.5 COMPONENTS OF THE COMPLIANCE FRAMEWORK

The components of the compliance framework are:

- Promoting voluntary compliance
- Monitoring compliance and detecting non-compliance
- Notifying NEPA
- Reporting on compliance

PROMOTING VOLUNTARY COMPLIANCE

The City's primary focus will be on prevention and avoidance of non-compliance. Adopting a conciliatory approach through a process of education, communication and negotiation will more often provide a positive outcome.

This will be achieved by:

- Providing information to the public and regulated third-parties about the Plan
- Implementing a development registration system

Providing information to regulated third-parties

The City will develop a series of educational materials to inform the public about the Plan and help support regulated third-parties to comply with the Commonwealth approval conditions. This may involve:

- Establishing a specific site on the City's website for the Plan
- Developing fact sheets and FAQs and other guidance materials

- Meeting with key stakeholders and other regulatory agencies
- Implementing an education campaign in cases where there is an increasing trend of non-compliance

Development registration system

As outlined in Section 7.5.4, the City will establish a development registration system to help ensure that:

- The City can monitor developments using the EPBC Act Part 10 approval
- Regulated third-parties (developers) are aware of their responsibilities under the Plan

MONITORING COMPLIANCE AND DETECTING NON-COMPLIANCE

Compliance monitoring data will be collected in accordance with the Plan's MERI framework.

The MERI framework includes KPIs for determining the extent of compliance with Commonwealth approval conditions and detailed monitoring protocols for each KPI.

The monitoring protocols will determine how monitoring data will be collected. This may include:

- Reports about compliance issues from the public, community groups and other regulatory authorities
- Site visits and inspections by the City – either random or in response to a notification
- Compliance audits and desktop investigations by the City, including audits of PSPs and permit conditions
- Data and reports required by other regulatory frameworks

The City will maintain accurate and complete compliance records and will provide any electronic copies of compliance records to the NEPA if requested and within the timeframe specified in the request.

Compliance officer

The City will create and fund a position whose responsibilities will include landowner education and liaison and support to the City's existing compliance team.

The compliance officer will support:

- Providing information and advice to regulated third-parties to support them to comply
- Identifying priority compliance issues and a decision-framework for taking compliance action
- Coordinating investigations and taking compliance action under relevant Victorian legislation
- Coordinating remedial actions to rectify the impacts of any non-compliance under relevant Victorian legislation
- Working with other appropriate regulatory authorities to investigate or take compliance action
- Supporting monitoring and reporting on compliance, including to NEPA

The compliance officer will have the powers available under the P&E Act and *Local Government Act 2020* to take compliance action where a breach of the Plan requirements is also a breach of those regulatory frameworks.

NOTIFYING NEPA

Notifying NEPA will be undertaken for non-compliances in relation to both:

- Delivery of commitments by the City or support partners
- Regulated third-parties taking approved actions under the endorsed Plan

Delivery of commitments by the City or support partners

Where the City identifies a potential non-compliance (the non-compliance has occurred or is likely to occur) with the delivery of commitments that the City or a support partner is responsible for, the City will:

- Notify NEPA of the non-compliance as soon as possible (within 30 days), including:
  - Nature of the non-compliance and whether it has occurred or is likely to occur
  - Any reasons for the non-compliance

- If the non-compliance is identified as high risk, provide NEPA with a plan setting out the compliance actions proposed to be taken to rectify the non-compliance and the timing for implementing these actions within 3 months
- For other non-compliances, undertake compliance actions appropriate to the level of risk and respond to any requirements of NEPA in relation to the non-compliance within a reasonable timeframe
- Report to NEPA regularly on progress in implementing the compliance actions

Non-compliances and the steps taken (or that will be taken, including estimated timing for taking these steps) to rectify these non-compliances, will be reported in the annual progress reports.

Regulated third-parties taking approved actions under the endorsed Plan

Where the City identifies a potential non-compliance (the non-compliance has occurred or is likely to occur) by regulated third-parties taking approved actions under the endorsed Plan, the City will:

- Undertake an initial assessment of the potential non-compliance to determine the nature of the non-compliance and whether it has occurred or is likely to occur
- Notify NEPA of the non-compliance following the initial assessment as soon as possible (within 30 days)
- Respond to the non-compliance if appropriate for the City to do so and report to NEPA regularly on progress in implementing the compliance actions
- Support NEPA in the case that the Commonwealth takes compliance action

Non-compliances and the steps taken (or that will be taken, including estimated timing for taking these steps) to rectify these non-compliances, will be reported in the annual progress reports.

REPORTING ON COMPLIANCE

The City will undertake regular reporting on compliance to ensure transparency and accountability. Reporting on compliance will be undertaken in accordance with the MERI program (see Section 7.5). The MERI program requires compliance to be reported in annual progress reporting and five-yearly assurance reports.

Annual progress reporting will report on:

- Any activities undertaken by the City to support voluntary compliance
- Number of non-compliances for the reporting period and the nature of the non-compliance
- Any compliance action taken by the City or other relevant responsible regulatory authority and the outcomes of the compliance action taken

Five-yearly independent assurance reports, which present the results of the independent five-yearly evaluations and assurance review, will report on:

- Analysis and key findings on extent of compliance with the Commonwealth conditions of approval
- Any recommendations for improving the implementation of the Plan, including compliance

7.7 DATA MANAGEMENT PROCESS

7.7.1 CONTEXT

The Endorsement Criteria for the Plan provided under the Strategic Assessment Agreement requires that the Plan outlines and commits to developing a process for data management and sharing of data (Attachment 2, Clause 4(e)).

7.7.2 COMMITMENT FOR DATA MANAGEMENT

The Plan's commitment for data management is provided in Table 7-11. The measures to deliver this commitment are set out in the Commitments and Measures document.

Table 7-11: Commitment for data management

No.	Commitment
28	A data management and sharing agreement will be developed to set out how data associated with the Plan will be managed and shared

7.7.3 TYPES OF DATA AND PURPOSE

A wide range of data was used to develop the Plan and will be used and updated throughout implementation the Plan. Additionally, new data will be collected throughout implementation as part of the Plan's MERI framework.

Key types of data include:

- Spatial and other data on existing biodiversity values
- Data on the impacts of the development on biodiversity values
- Boundary data, such as the boundaries of development land and avoided land
- Monitoring data to be collected in accordance with the MERI framework, including:
  - Implementation data
  - Environmental data
  - Compliance data

7.7.4 PURPOSE OF DATA COLLECTION

The key purpose of the data collection and management will be to inform achievement of the Plans outcomes and commitments through the MERI framework. Section 7.5.4 describes the MERI framework including:

- The monitoring data that will be collected
- How data will be used to inform the evaluations of the Plan
- Which data will be reported on and who it will be reported to (e.g. the public, regulators and other stakeholders)
- How data will be used to inform adaptive management of the Plan throughout implementation

7.8 PROCESS FOR CHANGING THE PLAN AND IMPLEMENTATION DOCUMENTS

7.8.1 CONTEXT

As the Plan will be implemented over a long time-period it is important that there is an appropriate level of flexibility provided during implementation to ensure the outcomes are achieved. Adaptive management of the Plan may be needed because of new opportunities that arise, changes in economic and social conditions, local events such as fires, floods and disease, climate variation, and administrative issues.

Flexibility during implementation is provided for in two ways:

- Making changes to the measures to deliver the commitments in the implementation documents – the BCS, the Commitments and Measures document, and the Funding Program (see Section 1.3)
- Making changes to the endorsed Plan in accordance with Part 10, Subdivision BA of the EPBC Act

Making changes to the measures in the implementation documents will be the key mechanism to maintain flexibility throughout implementation of the Plan. Changes to the Plan in accordance with Part 10, Subdivision BA of the EPBC Act will only be made where absolutely necessary, and in accordance with the relevant requirements of the EPBC Act (see Section 7.8.4 below).

7.8.2 REQUIREMENTS FOR CHANGING THE IMPLEMENTATION DOCUMENTS

TRIGGER POINT FOR ADAPTIVE MANAGEMENT

The five-yearly evaluations will be the primary trigger point and basis for any adaptive management of the Plan through changes to the implementation documents (see 1.3.2). Adaptive management may also be triggered on an ad hoc basis in response to issues or opportunities that arise and need to be addressed immediately (see Section 7.5.3).

Criteria will be established to determine trigger points for when adaptative management should be considered outside the five-yearly evaluations.

OPTIONS FOR ADAPTIVE MANAGEMENT

Options for adaptive management will vary according to the situation and will be determined on a case-by-case basis through a process which forms part of the improvement steps under the Plan's MERI framework (see adaptive management in Section 7.5.4).

CRITERIA FOR CHANGING THE IMPLEMENTATION DOCUMENTS

Changes to the implementation documents are possible where the following requirements are met:

- Five-yearly evaluations or ad hoc adaptive management recommend changes that are endorsed by the Executive Leadership Group
- The changes are consistent with the Commonwealth approval conditions
- The changes do not compromise the ability to achieve the outcomes and commitments of the Plan
- The changes do not materially increase the impacts to MNES that were determined and assessed through the Strategic Assessment Report. This requirement relates to the nature, duration, extent, and likely severity of the impacts on the environment of the changes

7.8.3 PROCESS FOR MAKING CHANGES TO THE IMPLEMENTATION DOCUMENTS

Proposed changes to the implementation documents will be provided to the Executive Leadership Group for approval. A request to change an implementation document will include the following:

- The details of the proposed changes
- Justification for the changes and how they will improve achievement of outcomes and delivery of commitments or other improvements to implement the Plan
- How the changes meet the requirements for changing the implementation documents identified in Section 7.8.2
- The proposed revised implementation document

The Executive Leadership Group will consider any proposed changes and:

- Approve the changes, or
- Recommend amendments to the implementation document changes

Once the changes to the implementation document are finalised, the City must formally update the document and provide a notice to NEPA, and a notice to the public on the City's website about the amendments.

Should the changes necessitate a review of the subordinate implementation documents that are included in the Greater Geelong Planning Scheme these changes will be implemented via a planning scheme amendment.

7.8.4 REQUIREMENTS FOR CHANGING THE PLAN

Once the Plan is endorsed under Part 10 of the EPBC Act, changes to the Plan document (excluding the implementation documents) can only be made with endorsement from the Minister in accordance with Part 10, Subdivision BA of the EPBC Act.

Changes to the Plan will only be made where identified as absolutely necessary in association with any relevant changes to the implementation documents, as identified through the process explained above. For example, a new commitment or adjustment of existing commitments may be required. This could be required for a range of reasons as set out in the improvement step under the Plan's MERI framework (see adaptive management in Section 7.5.4). For example, to meet conservation outcomes for a new listing of a species or TEC that cannot be accommodated through changes to the measures in the implementation documents.

To make a change to the Plan under this process, the responsible person for the Plan (the City) may request in writing for the Minister to approve a minor variation of the Plan (see Section 146DH of the EPBC Act). This request must include:

- Details of the proposed variation
- The reasons for the request
- The reasons why the City considers the proposed variation is minor

A minor variation (as per Section 146DH of the EPBC Act) is variation where:

- The adverse impacts (if any) on matters protected under the Plan as a result of the variation, are not greater than the adverse impacts on the same matters under the Plan as in force at the time of the request
- The measures in the Plan to mitigate, repair, or compensate for damage to matters would not be reduced as compared with the existing measures in the Plan as in force at the time of the request

Following submission of the request to change the endorsed Plan, the Minister will either approve or refuse the variation in accordance with Section 146DI of the EPBC Act.

References

ABS (2020) *Region summary: Geelong*. Available at: https://dbr.abs.gov.au/region.html?lyr=sa4&rgn=203.

Commonwealth of Australia (2012) 'How to use the offsets assessment guide'.

Corangamite CMA (2014) 'Corangamite Waterway Strategy 2014 - 2022'.

Dahlhaus, P. *et al.* (2003) 'Victorian Volcanic Plains Scoping Study'. CSIRO Land and Water.

DELWP (2017a) 'Growling Grass Frog Crossing Design Standards Melbourne Strategic Assessment'. Department of Environment, Land, Water and Planning.

DELWP (2017b) 'Growling Grass Frog Habitat Design Standards Melbourne Strategic Assessment'. Department of Environment, Land, Water and Planning.

DELWP (2017c) 'Guidelines for the removal, destruction or lopping of native vegetation'.

DELWP (2019) 'Victoria's Climate Science Report 2019'.

DELWP (2020) 'Port Phillip Bay (Western Shoreline) & Bellarine Peninsula Ramsar Site Ecological Character Description'. Department of Environment, Land, Water and Planning.

DELWP (2021) 'Flora and Fauna Guarantee Act 1988 Public authority duty'.

DEWHA (2009) 'NRM MERI Framework'.

DSE (2003) 'Biodiversity Action Planning: Strategic Overview for the Victorian Volcanic Plain Bioregion'. Victorian Government Department of Sustainability and Environment.

DSEWPC (2012a) 'Environment Protection and Biodiversity Conservation Act 1999 Environmental Offsets Policy'.

DSEWPC (2012b) 'Environment Protection and Biodiversity Conservation Act 1999 Environmental Offsets Policy'.

EHP (2021) 'Existing Ecological Conditions: Northern and Western Geelong Growth Areas'. Prepared for the City of Greater Geelong.

Geelong Region Alliance (2007) 'The Geelong Region Plan'. G21 Geelong Region Alliance.

Geelong Region Alliance (2013) 'G21 Regional Growth Plan'. G21 Geelong Region Alliance.

Gordon, A. *et al.* (2011) 'Assessing the impacts of biodiversity offset policies', *Environmental Modelling and Software*, 26(12), pp. 1481–1488. Available at: https://doi.org/10.1016/j.envsoft.2011.07.021.

The City of Greater Geelong (2021) 'The Northern and Western Geelong Growth Areas Framework Plan.'

The City of Greater Geelong (2022) 'Greater Geelong Planning Scheme'.

Victoria State Government (2017) 'Plan Melbourne 2017-2050'. Available at: https://planmelbourne.vic.gov.au/home.

Victorian Planning Authority (2021) 'Precinct Structure Planning Guidelines: New Communities in Victoria'.

Wathaurong Aboriginal Co-operative (2021) 'Wathaurong History & Profile'. Available at: https://www.wathaurong.org.au/history-profile/.

Williams, N. (2022) 'Southern Volcanic Plain'. University of Melbourne, Ecolinc. Available at: https://grasslands.ecolinc.vic.edu.au/bioregions/southern-volcanic-plain.

THE CITY OF
GREATER GEELONG

NORTHERN AND WESTERN GEELONG GROWTH AREAS

COMMITMENTS AND MEASURES

JULY 2026

CITY OF GREATER GEELONG

ACKNOWLEDGEMENT OF COUNTRY

Greater Geelong is located on the traditional lands of the Wadawurrung people. The land was created by the great ancestor spirit, Bunjil, the wedge-tailed eagle. Wadawurrung territory extends from the great dividing range in the north to the coast around Port Phillip Bay.

The city acknowledges the Wadawurrung people as the traditional owners of this land who to this day practice their culture and uphold the dignity of their ancestors.

DOCUMENT TRACKING

This document was prepared on behalf of the City of Greater Geelong by Biosis and Open Lines.

PREPARED BY:	
Mitchell Ross, Heather Tolley (Open Lines)	
REVIEWED BY:	
Mitchell Deaves (Biosis), Heather Tolley, Peter Hemphill (Open Lines)	
VERSION CONTROL:	
VERSION:	Final
DATE:	July 2026

Contents

1 INTRODUCTION 1

1.1 The Strategic Assessment 1

1.2 Outcomes framework and purpose of this document 2

1.3 Structure of this document 4

2 OBJECTIVE, OUTCOMES, COMMITMENTS AND MEASURES UNDER THE PLAN 5

2.1 Objective of the Plan 5

2.2 Outcomes of the Plan 5

2.3 Commitments, measures and KPIs for the Plan 9

3 OBJECTIVE, OUTCOMES, COMMITMENTS AND MEASURES UNDER THE BCS 50

3.1 Objective of the BCS 50

3.2 Outcomes of the BCS 50

3.3 Commitments and measures for the BCS 50

REFERENCES 55

List of Figures

Figure 1-1: Strategic assessment documents 2

List of Tables

Table 1-1: Definition of the components of the outcomes framework 3

Table 2-1: Outcomes of the Plan and their associated KPIs 5

Table 2-2: Commitments and measures for the Plan 10

Table 2-3: Commitments for the Plan and their associated KPIs 43

Table 3-1: Outcomes specific to the BCS 50

Table 3-2: Commitments and measures specific to the BCS 51

Table 3-3: Commitments for the BCS and their associated KPIs 54

Acronyms and terms

Acronyms	Meaning
Corangamite CMA	Corangamite Catchment Management Authority
BCS	Biodiversity Conservation Strategy
DEECA	Victorian Government Department of Environment, Energy and Climate Action
DELWP	The former Victorian Government Department of Environment, Land, Water and Planning (now DEECA and DTP)
DTP	Victorian Government Department of Transport and Planning
EPBC Act	Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*
KPI	Key Performance Indicator
MERI	Monitoring, evaluation, reporting and improvement
MNES	Matters of National Environmental Significance
NDA	Net Developable Area
NEPA	National Environmental Protection Agency
NGGA	Northern Geelong Growth Area
NVPP	Native Vegetation Precinct Plan
PSP	Precinct Structure Plan
SAR	Strategic Assessment Report
TEC	Threatened Ecological Community
VGED	Victorian Grassland Earless Dragon
WGGA	Western Geelong Growth Area
WIK	Works in Kind

Terms / Abbreviations	Definition
BCS guiding principles	A set of principles to guide both the preparation of the BCS and the decisions that will need to be made as part of the strategy's implementation
City Implementation Group	The primary body responsible for day-to-day implementation of the Plan
Conservation Management Plan	The document used to provide for the protection and ongoing management of the biodiversity values within each strategic conservation area
Construction Environmental Management Plans	A plan developed to ensure appropriate environmental management practices are implemented during the construction phase of a project
Cowies Creek Conservation Area	The section of Cowies Creek within the WGGA to be protected and managed for conservation purposes under the Plan
Development land	Specified land within the Strategic Assessment Area where development under the Plan is proposed to occur
Development under the Plan	The broad term used to describe all development occurring under the Plan. This includes land subject to development within the Growth Areas, the External infrastructure corridors, the Northern Conservation Area, the Eastern Conservation Area, the gully avoidance area, Cowies Creek Conservation Area and Moorabool avoidance area
Gully avoidance area	Area of land within the NGGA to be avoided for conservation under the Plan

Terms / Abbreviations	Definition
Eastern Conservation Area	Area of land within the NGGA to be protected and managed for conservation purposes under the Plan
Evaluation Questions	The questions used to evaluate the Plan in regard to the achievement of outcomes and implementation of commitments
External infrastructure	Development comprising the supporting infrastructure and services class of action and the environmental management class of action that is located outside of Growth Areas but within the Strategic Assessment Area
Land subject to development	Development land within the Growth Areas subject to all classes of actions under the Plan
Moorabool avoidance area	Area of land within the WGGA to be avoided for conservation under the Plan
Moorabool River corridor	Area of land within the WGGA to be avoided for conservation under the Plan
Northern Conservation Area	Area of land within the NGGA to be avoided for conservation purposes under the Plan
Process based development	Development that is subject to an additional process prior to development occurring. This includes: • Development within part of the Heales Road East precinct • External infrastructure development
Specific mitigation measures	Additional mitigation measures beyond those delivered through the existing planning system to address specific risks to MNES associated with the implementation of the Plan
Stakeholder engagement strategy	A process for stakeholder engagement to guide the City in undertaking ongoing engagement with key stakeholders over the life of the Plan
Standard mitigation measures	Mitigation measures delivered by the Victorian planning system through the PSP process, existing provisions in the Greater Geelong Planning Scheme, and the planning permit process
Strategic Conservation Area	Areas within the Growth Areas that will be avoided from development and protected and managed for conservation in-perpetuity
The City	The City of Greater Geelong
The Executive Committee	The Northern and Western Geelong Growth Areas EPBC Plan Executive Committee
The Framework Plan	*Northern and Western Geelong Growth Area Framework Plan*
The Growth Areas	Northern and Western Geelong Growth Areas
The Plan / the EPBC Plan	The Northern and Western Geelong Growth Areas EPBC Plan
Works in Kind	A contribution in lieu of payment of the biodiversity levy amount

1 Introduction

The City of Greater Geelong (the City) has identified two key areas for urban growth in Geelong's northwest in the Northern and Western Geelong Growth Areas (the Growth Areas).

The Growth Areas were identified through several State planning strategies for future growth. The City subsequently developed the *Northern and Western Geelong Growth Areas Framework Plan* (the Framework Plan) (The City of Greater Geelong, 2021), which describes the Growth Areas and outlines considerations for their future development until 2047.

Development within the Growth Areas and associated infrastructure development outside the Growth Areas will lead to impacts to biodiversity values protected under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) and impacts on biodiversity values protected under Victorian biodiversity regulations.

1.1 THE STRATEGIC ASSESSMENT

To support development in the Growth Areas and protect matters of national environmental significance (MNES), the City has undertaken a strategic assessment under Part 10 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). This enables a landscape scale assessment and approval of a suite of development actions under the EPBC Act and provides the opportunity to deliver improved environmental and development outcomes compared to project-by-project assessments through strategic consideration of biodiversity issues.

As part of the strategic assessment process, the City has prepared the *Northern and Western Geelong Growth Areas EPBC Plan* (the Plan). The Plan ensures development within the Growth Areas, as well as associated infrastructure development outside the Growth Areas, protects MNES and proceeds in accordance with the requirements of the EPBC Act.

The Plan:

- Describes the development (classes of actions) that approval is being sought for under the EPBC Act
- Sets out an objective, and a series of outcomes and commitments to define what the Plan will achieve
- Sets out a conservation framework to address the impacts of the development on MNES, including through avoiding and minimising, mitigating and offsetting residual impacts
- Sets out an assurance and implementation framework to implement the Plan

The Plan is supported by four documents. These include:

- Three implementation documents:
  - The Northern and Western Geelong Growth Areas Commitments and Measures (this document)
  - The Northern and Western Geelong Growth Areas Biodiversity Conservation Strategy (BCS)
  - The Northern and Western Geelong Growth Areas Funding Program
- A Strategic Assessment Report (SAR)

The three implementation documents contain more information about how the Plan will be implemented. The BCS also addresses how the outcomes of the strategic assessment are consistent with Victorian biodiversity regulations and provides additional outcomes for the protection of State-listed and locally significant biodiversity values.

The Strategic Assessment Report (SAR) has been prepared to assess the impacts of development under the Plan on MNES. The SAR evaluates the adequacy of the Plan's outcomes, commitments and measures in protecting MNES over the life of the Plan.

Figure 1-1 shows the relationship between the documents associated with the strategic assessment.

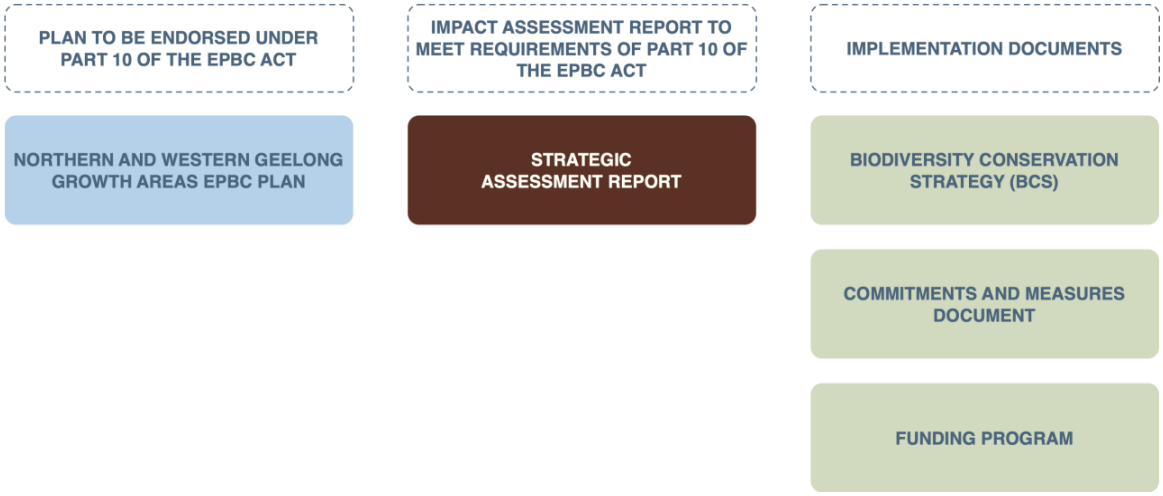


Figure 1-1: Strategic assessment documents

1.2 OUTCOMES FRAMEWORK AND PURPOSE OF THIS DOCUMENT

The Plan identifies a broad objective, as well as ten national level outcomes relating to the protection of MNES under the EPBC Act and socio/economic considerations. The Plan's outcomes represent standards of environmental protection that will be achieved for MNES under the Plan in accordance with the requirements of the EPBC Act.

The BCS identifies an additional broad objective focussing on state and local biodiversity. Some of the Plan's outcomes are relevant to the BCS, but additional state and local specific outcomes are also provided in the BCS.

The Plan and the BCS objectives and outcomes will be achieved through the delivery of a set of commitments and measures.

1.2.1 OUTCOMES FRAMEWORK

The outcomes, commitments and measures were developed as part of an 'outcomes framework' based on program logic principles. The outcomes framework provides a way to structure what the Plan will deliver for the conservation of protected matters in a clear and logical way. It supports accountability and transparency by providing the basis and set of benchmarks for monitoring, reporting, and ongoing evaluation and adaptive management of the Plan.

The outcomes framework is a requirement of the Endorsement Criteria in the Strategic Assessment Agreement.

The outcomes framework for both the Plan and BCS is comprised of four components:

- A broad ***objective***
- ***Outcomes***
- ***Commitments*** to deliver the outcomes
- ***Measures*** to implement the commitments

The definition of each of these in relation to the Plan and BCS is provided in Table 1-1.

The outcomes framework is described in more detail in Chapter 3 of the Plan and Section 2.1 of the BCS.

Table 1-1: Definition of the components of the outcomes framework

Framework component	Definition
Plan objective	The reason the Plan is being undertaken and the broad goal it is intended to support
BCS objective	The contribution that the outcomes of the BCS will make to biodiversity
Plan outcomes	The impacts or changes to environmental and socio/economic conditions that are expected to be achieved because of the delivery of the commitments and that are needed to achieve the overall objective of the Plan
BCS outcomes	The positive impacts or changes to biodiversity values that are needed to achieve the overall objective of the BCS. The outcomes are set out in relation to: • National level biodiversity outcomes (these are taken from the Plan) • State and local biodiversity outcomes which are specific to the BCS • An implementation outcome for the BCS
Commitments	The direct results of implementing the measures that are expected to lead to the achievement of the outcomes
Measures	The specific actions that will be undertaken to meet the commitments.

1.2.2 PURPOSE OF THIS DOCUMENT

The outcomes and commitments are set out in the Plan and the BCS. Once the Plan is endorsed under Part 10 of the EPBC Act, changes to the Plan can only be made with endorsement from the Minister in accordance with Part 10, Subdivision BA of the EPBC Act (see Section 7.8 of the Plan).

The measures to implement the Plan and BCS commitments are set out in this document. This document also provides the following details for each measure:

- Responsibility
- Key support partner(s) (if relevant)
- Timing

Additionally, this document provides key performance indicators (KPIs) for each outcome and commitment. KPIs have been developed as part of the Plan's MERI framework for understanding:

- If each outcome is being achieved and if not, the possible factors that are causing the outcome to not be achieved
- If each commitment is being delivered efficiently and effectively

Additional KPIs will be established for compliance with the Commonwealth approval conditions within 12 months of endorsement of the Plan. These will be added to this document once finalised.

The measures and KPIs set out in this document may be updated from time to time over the life of the Plan through an adaptive management process in accordance with the Plan's monitoring, evaluation, reporting and improvement (MERI) framework (see Section 7.5 of the Plan). The improvement step of the MERI framework provides the opportunity to adaptively manage implementation of the Plan to ensure the commitments are successfully delivered and the Plan's objective and outcomes are achieved.

The ability to adapt the measures is an important and necessary characteristic of the outcomes framework, designed to better assure successful delivery of the outcomes and commitments, rather than providing inappropriate lenience or flexibility where environmental diligence and obligations have not been adequately met.

1.3 STRUCTURE OF THIS DOCUMENT

This document is structured as follows:

- Section 2 provides the Plan (national level) objective, outcomes, commitments and measures (some of which are also relevant to the BCS), and provides KPIs for the Plan outcomes and commitments
- Section 3 provides the BCS (state and local level) objective, outcomes, commitments and measures which are only relevant to the BCS, and provides KPIs for the BCS outcomes and commitments

1.3.1 NUMBERING OF OUTCOMES, COMMITMENTS AND MEASURES

To provide clarity, different numbering systems are used to distinguish the national level versus state and local level outcomes, commitments and measures.

National level outcomes and commitments provided in the Plan and their associated measures are identified using cardinal numbers (e.g. 1, 2, 3 etc).

State and local outcomes, commitments provided in the BCS and their associated measures are identified using Roman numerals (e.g. i, ii, iii etc).

2 Objective, outcomes, commitments and measures under the Plan

This section provides the national level objective and outcomes relevant to approval under Part 10 of the EPBC Act (as detailed in the Plan). A detailed set of measures is then provided for each of the national level commitments. These measures are to enable adequate implementation of the Plan and the achievement of the outcomes and objective of the Plan.

2.1 OBJECTIVE OF THE PLAN

The objective of the Plan is to:

Provide for the protection of matters of national environmental significance while supporting the delivery of the Northern and Western Geelong Growth Areas Framework Plan and its objectives

2.2 OUTCOMES OF THE PLAN

The outcomes of the Plan and their associated KPIs are set out in Table 2-1. An explanation, including definition of key terms, is provided at the end of the table.

Table 2-1: Outcomes of the Plan and their associated KPIs

No.	Outcome	Key performance indicators
1	Populations of Golden Sun Moth and Striped Legless Lizard are maintained within the Northern Conservation Area	a) Extent and condition of mapped habitat for Golden Sun Moth within the Northern Conservation Area
		b) Extent and condition of mapped habitat for Striped Legless Lizard within the Northern Conservation Area
		c) Presence of Golden Sun Moth within the Northern Conservation Area
		d) Presence of Striped Legless Lizard within the Northern Conservation Area
2	The extent and condition of Natural Temperate Grassland is maintained within the Eastern Conservation Area	e) Extent and condition of Natural Temperate Grassland within the Eastern Conservation Area
3	Impacts to habitat for Golden Sun Moth, Striped Legless Lizard and Natural Temperate Grassland within the gully avoidance area are avoided and minimised	f) Extent of habitat for Golden Sun Moth within the gully avoidance area
		g) Extent of habitat for Striped Legless Lizard within the gully avoidance area
		h) Extent of Natural Temperate Grassland within the gully avoidance area
4	Potentially suitable habitat attributes for Victorian Grassland Earless Dragon within the Northern Conservation Area are protected and managed to support potential recovery of the species	i) Extent and condition of potentially suitable habitat attributes for Victorian Grassland Earless Dragon within the Northern Conservation Area
5	Actions that support the long-term viability and recovery of the Victorian Grassland Earless Dragon	j) The achievement of Commitment 17, which requires the Trust Fund to be established and funded (as measured by the KPIs for Commitment 17)

No.	Outcome	Key performance indicators
	are funded by the Victorian Grassland Earless Dragon Trust Fund, and are implemented	k) The achievement of the conservation funding objectives (to be defined under Measure 67), which will be evaluated as part of the annual reporting framework for the Trust Fund (required under Measure 66) through the tracking of expenditure, activities, and conservation outcomes
6	The long-term viability of the important population of the Growling Grass Frog along Cowies Creek is supported through the protection and enhancement of habitat	l) Extent and condition of Growling Grass Frog habitat within the Cowies Creek Conservation Area
		m) Presence of Growling Grass Frog within the Cowies Creek Conservation Area
7	The establishment of offset sites outside the Growth Areas leads to the protection and management of known habitat for Natural Temperate Grassland, Golden Sun Moth and Striped Legless Lizard	n) Extent and condition of Natural Temperate Grassland within offset areas delivered outside of the Growth Areas
		o) Extent and condition of habitat for Golden Sun Moth within offset areas delivered outside of the Growth Areas
		p) Extent and condition of habitat for Striped Legless Lizard within offset areas delivered outside of the Growth Areas
8	Matters of national environmental significance associated with the Moorabool avoidance area, as well as other waterways, riparian areas and wetlands are protected from any adverse impacts of development under the Plan	q) Extent of the Moorabool avoidance area that is avoided and protected
		r) The achievement of Commitment 13, which requires identification and implementation of additional specific mitigation measures to minimise the indirect impacts of the development on MNES associated with waterways, riparian areas and wetlands (as measured by KPIs for Commitment 13)
9	The Plan improves regulatory efficiency by streamlining EPBC Act approvals	s) Number of developments tracked using the Part 10 approval under the Plan
10	Implementation of the Plan is effective, timely, and cost efficient	t) Achievement of the Plan's outcomes (as per KPIs for outcomes and as defined in Section 7.5.4 Evaluation of the Plan)
		u) Efficiency of the Plan's commitments (as defined in Section 7.5.4 Evaluation of the Plan)
		v) Effectiveness of the Plan's commitments (as defined in Section 7.5.4 Evaluation of the Plan)

2.2.1 EXPLANATION AND DEFINITION OF KEY TERMS

The following provides a rationale for the outcomes and definition of the key terms.

OUTCOME 1

The populations of Golden Sun Moth and Striped Legless Lizard within the NGGA are two of the key MNES values present. Existing threats in the area continue to degrade habitat and reduce the long-term viability of these populations. The Plan will protect, restore and actively manage some existing areas of habitat within the NGGA to ensure that these species persist in the area.

In this context, the meaning of the term 'maintained' is defined as and would be considered achieved where both, over the life of the Plan:

- The extent of mapped habitat is shown to be the same or greater than that presented in the SAR
- Both species continue to be recorded within the Northern Conservation Area over the life of the Plan

OUTCOME 2

The Natural Temperate Grassland within the NGGA is one of the key MNES values present within the Growth Area. Existing threats in the area continue to degrade the condition and extent of the Threatened Ecological Community (TEC). The Plan will protect, restore and actively manage some existing areas of habitat within the NGGA to ensure that Natural Temperate Grassland persists in the area. In this context, the meaning of the term 'maintained' is defined as and would be considered achieved where both, over the life of the Plan:

- The extent of mapped habitat for Natural Temperate Grassland is shown to be the same or greater than that presented in the SAR
- Vegetation that meets the condition thresholds for Natural Temperate Grassland continues to be recorded within the Eastern Conservation Area over the life of the Plan.

OUTCOME 3

Parts of the gully avoidance area within the NGGA provide habitat for Golden Sun Moth, Striped Legless Lizard and Natural Temperate Grassland, which are three of the key MNES values present. Existing threats in the area continue to degrade the condition and extent of the habitat for these MNES. The Plan will avoid impacts to existing areas of habitat for these MNES within the gully avoidance area and restrict development in the surrounding areas. This will help ensure habitat for the MNES to persist within the NGGA.

In this context, the meaning of the term 'impacts... will be avoided and minimised' would be considered achieved if the extent of all known habitat for the three MNES within the gully avoidance area is avoided and not subject to development actions under the Plan.

OUTCOME 4

The rediscovery of the Victorian Grassland Earless Dragon in Victoria part way through the strategic assessment led to an intensive process to better understand the potential importance of the Growth Areas to the species. Little is known about the species' specific habitat preferences and current occupied distribution. Best available knowledge drawn from an understanding of habitat at the rediscovery site, historical observations and studies of other Grassland Earless Dragon species is reflected in the Commonwealth's Conservation Advice and draft Recovery Plan. The data gathering and analysis undertaken for the Growth Areas aimed to respond to and align with the information presented in these documents. This work concluded that the Growth Areas are unlikely to currently support an extant population of the Victorian Grassland Earless Dragon.

However, the location of the Growth Areas within the modelled distribution of the species and the presence of some potentially suitable habitat attributes means that part of the Growth Areas could be important for the recovery of the species in light of its recent rediscovery. The Northern Conservation Area contains some of the best and most strategically located areas with potentially suitable habitat attributes.

In this context, 'supporting potential recovery of the species' would be considered achieved where protection and active management of the Northern Conservation Area to enhance these attributes is ongoing. This will enable future opportunities for potential reintroduction, should that be determined at the time to best support the recovery of the species.

OUTCOME 5

As discussed above, the Victorian Grassland Earless Dragon (VGED) was rediscovered in Victoria part way through the strategic assessment and subsequently the best and most strategically located areas with potentially suitable habitat attributes were prioritised for protection under Outcome 4.

In addition, the Plan commits to providing funding for the implementation of key recovery actions for the species over the life of the Plan. This funding will be directed by VGED experts to the highest priority and most beneficial actions for the species over the next 30 years. This approach was proposed as it will:

- Complement the protection of habitat that is potentially important to the recovery to VGED within the Northern Conservation Area

- Have the greatest beneficial impact to the species by:
  - Providing flexibility around the actions that are funded and allowing the focus to be on the highest priority recovery actions
  - Addressing the evolving knowledge base and recovery priorities over time

'Actions that support the long-term viability and recovery of the Victorian Grassland Earless Dragon' would be considered funded and implemented where funding provided to the Trust led to the achievement of key recovery actions and objectives for Victorian Grassland Earless Dragon over the life of the Plan, which will be defined as part of implementation of the Plan. Recovery actions and objectives may include:

- Secure, manage and monitor the VGED rediscovery site
- Identify, secure, manage, and monitor additional VGED habitat
- Facilitate reintroduction of VGED into managed sites
- Prevent further decline of potentially suitable VGED habitat
- Increase knowledge of the species, emerging threats and conservation requirements

OUTCOME 6

The population of the Growling Grass Frog within the WGGA is one of the key MNES values present within the Growth Area. The species displays classical metapopulation dynamics. In relation to the Growth Areas, this means that the population recorded within the WGGA occurs as part of a larger metapopulation within Cowies Creek made up of discrete populations connected by migration. These discrete populations can naturally change over time and go locally extinct (for instance, due to flooding events) and then be recolonised from connected populations. As a result, the continued persistence of the WGGA population is dependent on both the presence and retention of suitable habitat, as well as the persistence of the downstream, connected populations that form the Cowies Creek metapopulation.

A range of external factors could influence the persistence of the broader metapopulation and many of these factors are outside the control or influence of the Plan. The Plan therefore provides for the protection, restoration and management of Growling Grass Frog habitat within the WGGA Cowies Creek Conservation Area with the aim of supporting the long-term persistence of this population over time, but without being able to commit to its continued persistence.

In this context, the meaning of the term 'supported' is defined as and would be considered achieved where the extent and condition of suitable Growling Grass Frog habitat within the Cowies Creek Conservation Area is improved over the life of the Plan compared to that presented in the SAR.

OUTCOME 7

Protected areas supporting known occurrences of Natural Temperate Grassland, Golden Sun Moth, and Striped Legless Lizard are needed for the recovery of these MNES in the long-term. The Plan represents a critical opportunity to deliver larger occurrences of these matters in good condition due to the strategic nature and coordinated implementation of the offset program.

In this context, this outcome would be considered achieved where offset sites outside the Growth Areas that contain known habitat for Natural Temperate Grassland, Golden Sun Moth and Striped Legless Lizard are established and managed.

OUTCOME 8

There are a number of MNES associated with the Moorabool avoidance area and in areas outside and downstream of the Strategic Assessment Area. The risks to these values are generally considered to be low as a result of avoidance of the Moorabool avoidance area and measures to mitigate and manage potential impacts which are expected to avoid any notable adverse impacts.

To demonstrate, monitor and manage to this outcome, a number of studies will be undertaken as part of implementation to ensure that precincts are designed and developed in a way which avoids notable adverse impacts to downstream values.

In this context, the meaning of the term 'protected from any notable adverse impacts' is defined as and would be considered achieved where, prior to final design and development of each precinct:

- Relevant downstream MNES values are identified
- The meaning of notable adverse impacts to those values are defined
- Necessary mitigation and management measures to avoid notable impacts are stipulated in a set of guidelines to be addressed as part of development

OUTCOME 9

Regulatory efficiency is an outcome that is required as part of the Endorsement Criteria under the Strategic Assessment Agreement. The Plan will deliver regulatory efficiency through the single Part 10 assessment and approval process which will ensure that future activities consistent with the classes of action do not require separate referral, assessment and approval under Parts 7, 8 and 9 of the EPBC Act. Design of the key elements of the Plan, including the commitments and MERI framework, will streamline the regulatory processes during implementation by removing the ongoing approval role of the Commonwealth government where State and local processes can adequately meet the requirements of the Plan.

OUTCOME 10

Lessons learnt from previous Part 10 Strategic Assessment processes point to the importance of effective implementation and its role in ensuring the MNES related outcomes are delivered. Timeliness and cost efficiency are key elements of good implementation which will help to ensure fair and equitable processes that facilitate the support and buy in from stakeholders needed to deliver on the outcomes of the Plan.

2.3 COMMITMENTS, MEASURES AND KPIS FOR THE PLAN

The commitments and measures for the Plan are set out in Table 2-2, including responsibility, support partner(s) and timing. In regard to timing, implementation of the Plan will commence at the point that the Plan is endorsed and one or more of the classes of action has been approved. The KPIs for the commitments are provided in Table 2-3.

Table 2-2: Commitments and measures for the Plan

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
Delivery of development						
1	Development within the Strategic Assessment Area will proceed in accordance with any Commonwealth approval conditions and in accordance with the EPBC Plan and NWGGA Biodiversity Conservation Strategy	1	Prepare PSPs for each precinct within the Growth Areas that are consistent with the Plan and the BCS	City of Greater Geelong	DTP	At PSP preparation stage for each precinct
		2	Incorporate relevant Plan commitments and associated measures as PSP Requirements and Guidelines for each precinct	City of Greater Geelong	-	At PSP preparation stage for each precinct
		3	Prepare schedules to the Urban Growth Zone for each precinct and specify requirements for permit applications, conditions that must be included on permits, and decision guidelines to give effect to the relevant Plan commitments and measures	City of Greater Geelong	DTP	At planning scheme amendment stage for the relevant precinct
2	Proposed minor changes to the boundaries of land subject to development (as shown in Figure 4-1 of the Plan) will meet the eligibility for consideration and be in accordance with the process for considering changes set out in Section 4.5 of the Plan	4	Review planning proposals that require a boundary change to the land subject to development against the eligibility for consideration in Section 4.5 of the Plan, and advise proponents of their eligibility or how the planning proposal could be adjusted	City of Greater Geelong	-	At PSP preparation stage for each precinct
		5	Undertake ecological surveys within the proposed new land subject to development for all protected matters with the potential to occur. Surveys must be undertaken by a qualified ecologist in accordance with relevant guidelines	Project proponent	City of Greater Geelong	At PSP preparation stage for each precinct

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
		6	Prepare a report assessing the potential direct and indirect impacts of the planning proposal requiring the boundary change on protected matters. The report must demonstrate how impacts are avoided and minimised, mitigated, and offset in accordance with the offsets mitigation hierarchy and the EPBC Act Offsets Policy (DSEWPC, 2012)	Project proponent	City of Greater Geelong	At PSP preparation stage for each precinct
		7	Provide the report to the City Implementation Group to review the information and determine eligibility. Subsequently provide the report to the EPBC Plan Executive Committee and NEPA for consideration and comment if eligible	City of Greater Geelong	NEPA	At PSP preparation stage for each precinct
		8	If the planning proposal within the proposed new land subject to development will significantly impact MNES or proposes to modify the boundaries of the Northern Conservation Area, Eastern Conservation Area or the Cowies Creek Conservation Area, the change will require separate approval under Parts 7-9 of the EPBC Act. All other changes will require endorsement by the City Implementation Group	City of Greater Geelong	NEPA	At PSP preparation stage for each precinct
		9	If the boundary change is endorsed: • Relevant maps in the BCS will be updated • The PSP will show the new boundary of land subject to development • The boundary change will be reported in the annual progress report for that year	City of Greater Geelong	-	At PSP preparation stage for each precinct

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
3	Development within the portion of Heales Road East subject to process based development (as shown in Figure 4-1 of the Plan) and external infrastructure development will only proceed if undertaken in accordance with the requirements for process based development in Section 6.3 of the Plan.	10	Prepare standards for process based development in accordance with Section 6.3 of the Plan	City of Greater Geelong	NEPA	Within the first 12 months of Plan implementation
		11	Prepare a report to the Executive Committee demonstrating that the requirements provided in the standards for process based development have been met	Project proponent	City of Greater Geelong	Prior to undertaking process based development
Conservation						
4	The Northern Conservation Area will be established in perpetuity to avoid and protect 50.5 ha of habitat for Striped Legless Lizard, 82 ha of habitat for Golden Sun Moth, and 81 ha of habitat potentially important for the recovery of Victorian Grassland Earless Dragon	12	Identify the conservation area in relevant PSPs as land to be protected for conservation in urban structure maps of the precinct	City of Greater Geelong	-	At PSP preparation stage for each precinct
		13	Apply an appropriate environment zone to the conservation area under the Greater Geelong Planning Scheme	City of Greater Geelong	-	At planning scheme amendment stage for the relevant precinct
		14	Identify native vegetation in the conservation area as to be retained within the relevant NVPPs	City of Greater Geelong	-	At PSP preparation stage for each precinct
		15	Purchase Stage 1 of the Northern Conservation Area (as shown in Figure 1 of SAR Supporting Document D)	City of Greater Geelong	Relevant landholder(s)	By the end of year 5 of Plan implementation
		16	Purchase Stage 2 of the Northern Conservation Area (as shown in Figure 1 of SAR Supporting Document D)	City of Greater Geelong	Relevant landholder(s)	At the time of subdivision of adjacent land
		17	Secure the conservation area under in-perpetuity, on-title agreements consistent with the security requirements of the *Guidelines for the removal, destruction or lopping of native vegetation* (DELWP, 2017c)	City of Greater Geelong	Relevant landholder(s)	At the time the land is purchased

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
5	A Conservation Management Plan will be prepared by a suitably qualified environmental professional and implemented for the protection and ongoing management of Striped Legless Lizard, Golden Sun Moth and Victorian Grassland Earless Dragon within the Northern Conservation Area	18	Prepare a Conservation Management Plan in accordance with the Commonwealth *Environmental Management Plan Guidelines* (DoE, 2014), and include the following information in the plan: • Objectives of the plan • Boundary of the conservation area • Native vegetation to be retained as identified in the NVPP • Extent and condition of habitat and records for Striped Legless Lizard and Golden Sun Moth • Extent and condition of potentially suitable areas for the recovery of Victorian Grassland Earless Dragon • Management actions and arrangements to protect and enhance Striped Legless Lizard, Golden Sun Moth, and potentially suitable areas for the recovery of Victorian Grassland Earless Dragon, including methods, standards and techniques, roles and responsibilities, timing for implementation, funding and monitoring and reporting	City of Greater Geelong	DEECA	Within 1 year of securing Stage 1 of the conservation area
		19	Include objectives in the Conservation Management Plan that are consistent with: • Protecting habitat supporting populations of the Striped Legless Lizard and Golden Sun Moth • Improving the condition of habitat for the Striped Legless Lizard and Golden Sun Moth	City of Greater Geelong	DEECA	Within 1 year of securing Stage 1 of the conservation area

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
			• Increasing the area of occupied habitat for the Striped Legless Lizard through regeneration or restoration of suitable areas • Protecting and improving the condition of potentially suitable areas for the recovery of Victorian Grassland Earless Dragon • Managing the threat of cat predation for Striped Legless Lizard and Victorian Grassland Earless Dragon			
		20	Provide a draft of the Conservation Management Plan to the EPBC Plan Executive Committee and NEPA for consideration and comment prior to its finalisation and approval by the City	City of Greater Geelong	-	Finalisation and approval within 6 months of providing the draft to the EPBC Plan Executive Committee and NEPA
		21	Implement the Conservation Management Plan over the life of the Plan	City of Greater Geelong	-	Following approval of the Conservation Management Plan by the City of Greater Geelong
6	The Eastern Conservation Area will be established in perpetuity to avoid and protect 5.5 ha of habitat for Natural Temperate Grassland	22	Identify the conservation area in relevant PSPs as land to be protected for conservation in urban structure maps of the precinct	City of Greater Geelong	-	At PSP preparation stage for each precinct
		23	Apply an appropriate environment zone to the conservation area under the Greater Geelong Planning Scheme	City of Greater Geelong	-	At planning scheme amendment stage for the relevant precinct
		24	Identify native vegetation in the conservation area as to be retained within the relevant NVPPs	City of Greater Geelong	-	At PSP preparation stage for each precinct
		25	Acquire the Eastern Conservation Area	City of Greater Geelong	Relevant landholder(s)	By the end of year 5 of Plan implementation

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
		26	Secure the conservation area under in-perpetuity, on-title agreements consistent with the security requirements of the Guidelines for the removal, destruction or lopping of native vegetation (DELWP, 2017c)	City of Greater Geelong	Relevant landholder(s)	At the time the land is purchased
7	A Conservation Management Plan will be prepared by a suitably qualified environmental professional and implemented for the protection and ongoing management of Natural Temperate Grassland within the Eastern Conservation Area	27	Prepare a Conservation Management Plan in accordance with the Commonwealth *Environmental Management Plan Guidelines* (DoE, 2014), and include the following information in the plan: • Objectives of the plan • Boundary of the conservation area • Native vegetation to be retained as identified in the NVPP • Extent and condition of habitat for Natural Temperate Grassland • Extent and condition of potential habitat for Striped Legless Lizard • Management actions and arrangements to protect and enhance Natural Temperate Grassland, including methods, standards and techniques, roles and responsibilities, timing for implementation, funding and monitoring and reporting • Management actions and arrangements to facilitating the expansion of Striped Legless Lizard through regeneration or restoration of suitable areas	City of Greater Geelong	DEECA	Within 1 year of securing of the conservation area

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
		28	Include objectives in the Conservation Management Plan that are consistent with: • Protecting Natural Temperate Grassland • Managing Natural Temperate Grassland to maintain extent and improve condition over time • Regenerating or restoring suitable areas for Striped Legless Lizard to facilitate the expansion of the species into the Eastern Conservation Area	City of Greater Geelong	DEECA	Within 1 year of securing of the conservation area
		29	Provide a draft of the Conservation Management Plan to the EPBC Plan Executive Committee and NEPA for consideration and comment prior to its finalisation and approval by the City	City of Greater Geelong	-	Finalisation and approval within 6 months of providing the draft to the EPBC Plan Executive Committee and NEPA
		30	Implement the Conservation Management Plan over the life of the Plan	City of Greater Geelong	-	Following approval of the Conservation Management Plan by the City of Greater Geelong
8	The gully avoidance area will avoid 3.5 ha of habitat for Striped Legless Lizard, 7 ha of habitat for Golden Sun Moth and 2.5 ha of Natural Temperate Grassland	31	When designing and securing the gully avoidance area ensure consideration is given to facilitating expansion of Striped Legless Lizard through to the Eastern Conservation Area	City of Greater Geelong	-	At PSP preparation stage for each precinct
		32	Identify the gully avoidance area in relevant PSPs as land to be avoided in urban structure maps of the precinct	City of Greater Geelong	-	At PSP preparation stage for each precinct
		33	Include public signage for the gully avoidance area that provides information about the biodiversity values of the area and instructs the public not to remove rocks or any other important habitat features	City of Greater Geelong	-	Within 6 months of securing the avoidance area

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
		34	Apply appropriate zoning to the gully avoidance area under the Greater Geelong Planning Scheme to facilitate environmental management and if relevant, permissible development as specified in the Section 4.3 of the EPBC Plan	City of Greater Geelong	-	At planning scheme amendment stage for the relevant precinct
		35	Identify native vegetation that comprises habitat for MNES in the gully avoidance area as vegetation to be retained within the relevant NVPPs	City of Greater Geelong	-	At PSP preparation stage for each precinct
9	The Cowies Creek Conservation Area will be established in perpetuity to avoid and protect habitat needed to support the continued persistence of the Growling Grass Frog and potential habitat for Glossy Grass Skink in the WGGA	36	In designing the Creamery Road PSP, confirm the boundaries of the Cowies Creek Conservation Area currently shown in the BCS to ensure the conservation area includes areas of habitat that may be needed to support the continued persistence of the Growling Grass Frog within the WGGA, including areas of habitat that may be used for breeding, foraging and movement	City of Greater Geelong	Corangamite CMA	At PSP preparation stage for each precinct
		37	Identify the conservation area in relevant PSPs as land to be protected for conservation in urban structure maps of the precinct	City of Greater Geelong	-	At PSP preparation stage for each precinct
		38	Apply an appropriate environment zone to the conservation area under the *Greater Geelong Planning Scheme* (The City of Greater Geelong, 2022)	City of Greater Geelong	-	At planning scheme amendment stage for the relevant precinct
		39	Identify native vegetation in the conservation area as to be retained within the relevant NVPPs	City of Greater Geelong	-	At PSP preparation stage for each precinct
		40	Conservation area to be vested to the City as part of subdivision of the subject land	City of Greater Geelong	Relevant landholder(s)	At the time of subdivision of adjacent land

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
		41	Conservation area to be established as part of the City's reserve program	City of Greater Geelong	Relevant landholder(s)	At the time of subdivision of adjacent land
10	A Conservation Management Plan will be prepared by a suitably qualified environmental professional and implemented for the protection and ongoing management of Growling Grass Frog, and areas of potential habitat for Adamson's Blown-grass and Glossy Grass Skink within the Cowies Creek Conservation Area	42	Prepare a Conservation Management Plan in accordance with the Commonwealth *Environmental Management Plan Guidelines* (DoE, 2014), *Growling Grass Frog Habitat Design Standards* (DELWP, 2017b), *Growling Grass Frog Crossing Design Standards* (DELWP, 2017a) and to address the requirement in the Framework Plan to develop a Master Plan for the corridor. Include the following information in the plan: • Objectives of the plan • Boundary of the conservation area • Native vegetation to be retained as identified in the NVPP • Growling Grass Frog records and habitat • Potential habitat for Adamson's Blown-grass and Glossy Grass Skink • Any locations suitable for public access points, walking paths/trails, and passive recreation • Any locations suitable for water management assets and associated infrastructure • Management actions and arrangements to protect Growling Grass Frog and its habitat, including methods, standards and techniques, roles and responsibilities, timing for implementation, funding and monitoring and reporting • Management actions and arrangements to maintain suitability of the area for	City of Greater Geelong	DEECA	Within 1 year of securing of the conservation area

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
			Adamson's Blown-grass, including the use of appropriate indigenous species for revegetation • Monitoring processes to allow for adaptive management of the CMP, including population monitoring for Growling Grass Frog and baseline surveys for Glossy Grass Skink in Cowies Creek			
		43	Include objectives in the Conservation Management Plan for Growling Grass Frog that are consistent with: • Protecting high quality instream habitat • Improving the condition of lower quality instream habitat • Protecting terrestrial habitat in buffer areas adjacent to the creek • Regenerating areas of terrestrial habitat that are degraded • Providing for the creation of off-stream habitat, where appropriate and beneficial to the species	City of Greater Geelong	DEECA	Within 1 year of securing of the conservation area
		44	Provide a draft of the Conservation Management Plan to the EPBC Plan Executive Leadership Group and NEPA for consideration and comment prior to its finalisation and approval by the City	City of Greater Geelong	-	Within 1 year of securing the conservation area
		45	Implement the Conservation Management Plan over the life of the Plan	City of Greater Geelong	-	Following approval of the Conservation Management Plan by the City of Greater Geelong

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
		46	Undertake the following actions if monitoring shows declines in the Cowies Creek Growling Grass Frog population: • Instigate further information gathering to try and determine the causes of the declines • Determine restorative actions based on the causes of decline. These may include: changes to how water quantity and/or quality are managed; management actions in the corridor to restore habitat; and/or creation of new habitat features (e.g. off-stream ponds) • Increase monitoring intensity to determine if restorative actions are working	City of Greater Geelong	DEECA	If monitoring shows declines in the Cowies Creek Growling Grass Frog population
11	Habitat enhancement works for the Growling Grass Frog will be undertaken in Cowies Creek downstream of the WGGA to support the: • Long-term viability of the Cowies Creek metapopulation of Growling Grass Frogs • Persistence of the species within the WGGA	47	Confirm the habitat enhancement works for Growling Grass Frog downstream of the WGGA through a process of detailed design. Works to be considered to include: • The creation of one or more off-line wetlands to create habitat for the species • Vegetation management to improve habitat quality for the species • Revegetation and bank stabilisation • Infrastructure changes to improve connectivity for the species under the Bluestone Bridge along Cowies Creek	City of Greater Geelong	-	Within the first 12 months of Plan implementation
		48	Implement the habitat enhancement works in accordance with the detailed design undertaken as part of Measure 47	City of Greater Geelong	-	As per the timing set out in the detailed design phase

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
12	Development within the Moorabool avoidance area will be restricted to support the potential MNES values of the river corridor and the escarpment	49	Identify the Moorabool avoidance area in the relevant PSP as land to be avoided in urban structure maps of the precinct	City of Greater Geelong	-	At PSP preparation stage for each precinct
		50	Apply appropriate zoning to the Moorabool avoidance area under the Greater Geelong Planning Scheme to facilitate environmental management and if relevant, permissible development as specified in the Section 4.3 of the EPBC Plan	City of Greater Geelong	-	At planning scheme amendment stage for the relevant precinct
		51	Identify native vegetation that comprises habitat for MNES in the Moorabool avoidance area as vegetation to be retained within the relevant NVPPs	City of Greater Geelong	-	At PSP preparation stage for each precinct
13	Standard mitigation measures will continue to be implemented to minimise the indirect impacts of the development on MNES in accordance with the requirements of the *Greater Geelong Planning Scheme* (The City of Greater Geelong, 2022), as updated from time to time, and generally in accordance with the Framework Plan (The City of Greater Geelong, 2021)	52	Continue to include standard mitigation measures as requirements and guidelines in PSPs and/or as conditions on permits, as appropriate, to mitigate the following indirect impact types: • Altered fire regimes and increased fire risk • Changes to water flows and quality • Disturbance from increased public access to natural areas • Fauna disturbance due to noise, dust and light • Fauna mortality, displacement, and barriers to movement • Inadvertent impacts on adjacent habitat or vegetation • Predation/competition/land degradation by pests/domestic fauna • Spread of infection/disease • Spread of weeds	City of Greater Geelong	-	At PSP preparation stage (for conditions included as requirements and guidelines in PSPs) and at the planning permit stage (for conditions included as permit conditions)

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
14	The following additional specific mitigation measures will be implemented to minimise the indirect impacts of development on the strategic conservation areas and avoidance areas: • Establish a conservation interface for land abutting conservation areas and avoidance areas • Design and baffle public lighting in accordance with National Light Pollution Guidelines for Wildlife to prevent light spill and glare within the Cowies Creek Conservation Area • Ensure the Construction Environmental Management Plans for construction works on land immediately adjacent to the conservation areas have specific regard to the CMP for the adjoining land	53	Identify a conservation interface between urban development and the boundaries of the strategic conservation areas and avoidance areas within relevant PSPs. The conservation interfaces must be established in accordance with relevant principles and standards set out in Section 4.4.2 of the BCS.	City of Greater Geelong	-	At PSP preparation stage for the relevant precinct
		54	Include the design and baffle of public lighting to prevent light spill and glare within the Cowies Creek Conservation Area as a requirement or guideline in PSPs and/or as a condition on permits for land use, subdivision and development, as appropriate	City of Greater Geelong	-	At PSP preparation stage for the relevant precinct
		55	Include the requirement for Construction Environmental Management Plans on land immediately adjacent to the strategic conservation areas to have specific regard to the CMP for the adjoining land as a requirement or guideline in PSPs and/or as a condition on permits for land use, subdivision and development, as appropriate. The purpose of these plans is to ensure that appropriate measures are put in place to mitigate the potential indirect impacts of construction on the MNES values within the strategic conservation areas. The Plans should stipulate the measures that will be undertaken and the monitoring and reporting that will be undertaken to ensure appropriate implementation.	City of Greater Geelong	-	At PSP preparation stage (for conditions included as requirements and guidelines in PSPs) and at the planning permit stage (for conditions included as permit conditions)

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
		56	Monitor and report on the inclusion of the specific mitigation measures in PSPs and as conditions on permits, as part of the monitoring program and annual progress reporting under the MERI framework	City of Greater Geelong	-	As part of annual progress reporting

15	Additional specific mitigation measures will be implemented to minimise the indirect impacts of the development on MNES associated with waterways, riparian areas and wetlands including:
	• EPBC listed threatened and migratory birds
	• *Galaxiella toourtkoourt* (Little Galaxias)
	• *Ranoidea raniformis* (Growling Grass Frog)
	• *Nannoperca obscura* (Yarra Pygmy Perch)
	• *Prototroctes maraena* (Australian Grayling)
	• *Pseudemoia rawlinsoni* (Glossy Grass Skink)
	• *Lachnagrostis adamsonii* (Adamson's Blown-grass)
		57	Undertake relevant technical studies to understand the key risks from development on protected matters associated with Hovells Creek and the Moorabool River. These studies will:
			• Address potential risks associated with changes to water quality and hydrology as a result of development within the Growth Areas
			• Identify appropriate measures, standards or targets to avoid and minimise adverse impacts on protected matters including, as relevant:
			  ○ Water quality parameters
			  ○ Water retention and flow management requirements
			  ○ Limits on extraction or use
			  ○ Habitat buffer requirements
			  ○ Monitoring and reporting
			These studies will be undertaken in consultation with relevant stakeholders, regulators and experts
				City of Greater Geelong	Corangamite CMA and other key stakeholders	Prior to PSP preparation for the relevant precincts

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
	• Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar site	58	Prepare guidelines based on the results of the technical studies to guide the preparation of PSPs and decisions on planning permits and permit conditions to ensure risks to protected matters in relation to indirect and downstream impacts are adequately managed	City of Greater Geelong	Corangamite CMA and other key stakeholders	Prior to PSP preparation for the relevant precincts
		59	Undertake a planning scheme amendment or other appropriate process to ensure the guidelines are considered during the preparation of PSPs and in decisions on planning permits and permit conditions	City of Greater Geelong	DTP	Prior to PSP preparation for the relevant precincts
		60	Ensure that stormwater infrastructure and ongoing stormwater management considers the Growling Grass Frog Habitat Design Standards (DELWP, 2017b) and any other relevant advice or standards to minimise potential adverse impacts to habitat for the Growling Grass Frog and Glossy Grass Skink within downstream reaches of Cowies Creek	City of Greater Geelong	DTP	Prior to PSP preparation for the relevant precincts

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
16	Offset sites will be established to meet the following requirements: • 21 ha of Natural Temperate Grassland • 342 ha of known habitat for Striped Legless Lizard • 506 ha of known habitat for Golden Sun Moth These offsets will be delivered through a combination of: • The Northern and Eastern Conservation Areas (Commitments 4 and 6), and • Strategic offset locations outside of the NGGA to meet the balance of the offset requirements • Works in Kind, Land in Kind or Offsets in Kind arrangements where appropriate	61	Develop strategic landscape criteria to guide the targeting of land suitable for strategic offsets. These criteria will consider: • Protecting areas of habitat that would be considered large for each MNES • Locating offsets within key biodiversity corridors to improve connectivity across the landscape • Connections to existing conservation reserves	City of Greater Geelong	-	Within the first 3 months of Plan implementation
		62	Identify priority offset locations that meet at least one of the strategic landscape criteria and establish a work program to engage with landholders within those areas to seek agreement to establishing offset sites	City of Greater Geelong	Landholders	Within the first 6 months of Plan implementation
		63	Confirm the presence and extent of Natural Temperate Grassland and known habitat for Striped Legless Lizard and Golden Sun Moth and other biodiversity values of the offset sites outside of the Growth Areas through field surveys undertaken in accordance with relevant survey guidelines	City of Greater Geelong	Landholders	Prior to agreeing with the landholder to secure the land as an offset site
		64	Secure offset sites under in-perpetuity, on-title agreements consistent with the security requirements of the *Guidelines for the removal, destruction or lopping of native vegetation* (DELWP, 2017c)	City of Greater Geelong	Landholders	Following identification of the offset site and confirmation of biodiversity values of the offset site
		65	Prepare an offset management plan for each offset site and undertake and report annually on management actions in accordance with the requirements of the *Guidelines for the removal, destruction or lopping of native vegetation* (DELWP, 2017c)	Landholders	City of Greater Geelong	Following securing the land as an offset site

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
17	The Victorian Grassland Earless Dragon Trust Fund will be established. A total amount of $12.7 million will be paid into the Trust Fund, to contribute to the recovery efforts of the species. Funding for the trust will include: • $1 million at establishment of the Trust Fund • $11.7 million paid via annual contributions, the final payment occurring before the end of Year 25 of the Plan	66	Establish and implement the Trust by: • Preparing and executing a Trust Deed which establishes the purpose, governance framework, and rules for management and allocation of conservation funds • Implementing an annual reporting framework to track expenditure, activities, and conservation outcomes • Establishing a Technical Advisory Committee to provide guidance on funding priorities and allocation, review monitoring data and outcomes, and support adaptive management • Implementing governance arrangements, including roles, responsibilities, and decision-making processes • Preparing the VGED strategy (as per Measure 67)	City of Greater Geelong	Trustee VGED Recovery Team NEPA DEECA	Within 1 year of Plan implementation
		67	Prepare a VGED strategy for the approval of the Commonwealth Minister for the Environment to guide implementation of the VGED Trust. The strategy will define clear conservation objectives to guide allocation of funds toward the recovery of Victorian Grassland Earless Dragon. Objectives will be informed by current Commonwealth and State conservation advice and plans. The objectives may include: • Secure, manage and monitor the VGED rediscovery site • Identify, secure, manage, and monitor additional VGED habitat	City of Greater Geelong (to prepare the strategy) Commonwealth Minister for the Environment (to approve the strategy)	Trustee Technical Advisory Committee DEECA	Within 1 year of Plan implementation

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
			• Facilitate reintroduction of VGED into managed sites • Prevent further decline of potentially suitable VGED habitat • Increase knowledge of the species, emerging threats and conservation requirements			
		68	Deliver the upfront payment of $1 million to the Trust	City of Greater Geelong	-	Within 1 year of Plan implementation
		69	Deliver annual contributions to the Trust equating to $11.7 million before the end of Year 25 of the Plan	City of Greater Geelong	-	Annually over life of the Plan (up to year 25 of the Plan)

18	Offset delivery will keep pace with and occur ahead of impacts within the NGGA	70	Monitor and track the rate of development within the NGGA and the associated impacts to Natural Temperate Grassland, Striped Legless Lizard and Golden Sun Moth using the following system:
			• Impacts will be tracked against the rate of development at a precinct level and then summed across the NGGA to keep a running total of the rate of impacts.
			• For each precinct:
			  ○ The total impacts to each MNES will be divided by the total Net Developable Area (NDA) to determine the average area of impact per hectare of development (area of impact/NDA)
			  ○ The rate of NDA that is developed will be tracked through tracking planning permits to determine the rate of impacts
				City of Greater Geelong	-	As development proceeds

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
		71	Secure offset sites at a rate that is faster than the rate of impacts to Natural Temperate Grassland, Striped Legless Lizard and Golden Sun Moth	City of Greater Geelong	-	As development proceeds
		72	Implement the following contingency steps if the rate of offsets is not ahead of the rate of impacts to Natural Temperate Grassland, Striped Legless Lizard and Golden Sun Moth: • The City will notify NEPA about the shortfall and outline proposed steps to remedy the issue • The City will make every effort to secure the necessary offsets within 12 months of a shortfall being identified • If the necessary offsets cannot be secured within the 12-month period, the City will pause planning permits within the NGGA until sufficient offsets are secured to address the level of impact to MNES	City of Greater Geelong	-	If monitoring shows that the rate of offsets is not ahead of the rate of impacts to Natural Temperate Grassland, Striped Legless Lizard or Golden Sun Moth
Process based development						
19	Development within the portion of Heales Road East subject to process based development (as shown in Figure 4-1 of the Plan) will be designed and located to prioritise avoidance of impacts to MNES and native vegetation. This must ensure that any confirmed population or	73	Undertake targeted surveys within the development footprint for all protected matters with the potential to occur. Surveys must be undertaken prior to development to inform the detailed planning and design phase of each development, and in accordance with relevant survey guidelines or standards (including published survey guidelines for MNES)	Project proponent	City of Greater Geelong	Prior to undertaking a development project within the portion of Heales Road East subject to process based development

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
	occurrence of MNES that would be considered important or notable (for instance, due to size, condition or potential contribution to the recovery of the MNES) is avoided and subsequently protected, maintained and managed to ensure the persistence of that population or occurrence in the long-term. Impacts to all other populations or occurrences will be avoided and minimised as far as practical	74	Prepare maps showing the location of any protected matters recorded within the development footprint to inform the detailed design of each development project and the avoidance that is proposed to occur within the development footprint	Project proponent	City of Greater Geelong	Prior to undertaking a development project within the portion of Heales Road East subject to process based development
		75	Include the following details in the report prepared in accordance with the standards for process based development (Measure 11): • The location of any protected matters within the development footprint • Details of the avoidance process undertaken including the avoidance of any confirmed population or occurrence of MNES that is considered important or notable	Project proponent	City of Greater Geelong	Prior to undertaking a development project within the portion of Heales Road East subject to process based development
		76	Monitor and report on residual impacts within the development footprints as part of the monitoring program and annual progress reporting under the MERI framework	City of Greater Geelong	Project proponent	Within 6 months following construction impacts of each development project within the portion of Heales Road East subject to process based development as part of annual progress reporting
		77	Should any important populations or occurrences of MNES be avoided within the development footprints, develop a Conservation Management Plan to ensure appropriate management of avoided areas. This plan will address potential indirect impacts associated with the spread of weeds, fire regimes, removal of rocks or other habitat	Project proponent	City of Greater Geelong	Prior to undertaking a development project within the portion of Heales Road East subject to process based development

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
			features and inappropriate road maintenance works such as slashing, grazing, clearing, herbicide application, and soil disturbance from vehicle traffic			
20	External infrastructure development will be designed and located to prioritise avoidance of impacts to MNES and native vegetation. The following specific avoidance outcomes will be delivered: • Spiny Rice-flower – any confirmed population or part of the population must be avoided and will be protected, maintained and managed to ensure the persistence of that population in the long-term • Victorian Grassland Earless Dragon - any confirmed population or part of the population must be avoided and will be protected, maintained and managed to ensure the persistence of that population in the long-term; and the recovery team will be notified	78	Undertake targeted surveys within the external infrastructure footprint for all protected matters with the potential to occur. This may include, but not be limited to: • Natural Temperate Grassland • Spiny Rice-flower • Adamson's Blown-grass • Striped Legless Lizard • Golden Sun Moth • Victorian Grassland Earless Dragon Surveys must be undertaken prior to development to inform the detailed planning and design phase of each infrastructure project, and in accordance with relevant survey guidelines or standards (including published survey guidelines for MNES)	Project proponent	City of Greater Geelong	Prior to undertaking an external infrastructure development project
		79	Prepare maps showing the location of any protected matters recorded within the external infrastructure footprint to inform the detailed design of each infrastructure project and the avoidance that is proposed to occur within the infrastructure footprint	Project proponent	City of Greater Geelong	Prior to undertaking an external infrastructure development project

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
	• Other MNES – any confirmed population or occurrence that would be considered important or notable (for instance, due to size, condition or potential contribution to the recovery of the MNES) must be avoided and will be protected, maintained and managed to ensure the persistence of that population or occurrence in the long-term. Impacts to all other populations or occurrences will be avoided and minimised as far as practical	80	Include the following details in the report prepared in accordance with the standards for process based development (Measure 11): • The location of any protected matters within the development footprint • Details of the avoidance process undertaken including how the avoidance outcomes have been met	Project proponent	City of Greater Geelong	Prior to undertaking an external infrastructure development project
		81	Monitor and report on residual impacts within the external infrastructure footprints as part of the monitoring program and annual progress reporting under the MERI framework	City of Greater Geelong	Project proponent	Within 6 months following construction impacts of each external infrastructure development project as part of annual progress reporting
		82	Should any important populations or occurrences of MNES be avoided within the external infrastructure footprints, develop a Conservation Management Plan to ensure appropriate management of avoided areas. This plan will address potential indirect impacts associated with the spread of weeds, fire regimes, removal of rocks or other habitat features and inappropriate road maintenance works such as slashing, grazing, clearing, herbicide application, and soil disturbance from vehicle traffic	Project proponent	City of Greater Geelong	Prior to undertaking an external infrastructure development project

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
21	Unavoidable clearing of any areas confirmed to support MNES due to development within the portion of Heales Road East subject to process based development (as shown in Figure 4-1 of the Plan) or external infrastructure development will be offset in accordance with the EPBC Act Environmental Offsets Policy and associated Offsets Assessment Guide (or equivalent) (Commonwealth of Australia, 2012; DSEWPC, 2012)	83	Determine offset requirements in accordance with the EPBC Act Environmental Offsets Policy and associated Offsets Assessment Guide (or equivalent) (Commonwealth of Australia, 2012; DSEWPC, 2012) based on the surveys conducted for development within the portion of Heales Road East subject to process based development or external infrastructure development, and in accordance with the standards for process based development (Measure 11)	Project proponent	City of Greater Geelong	Prior to undertaking a development project within the portion of Heales Road East subject to process based development or an external infrastructure development project
		84	Include the following details in the report prepared in accordance with the standards for process based development (Measure 11): • The location of any MNES within the development footprint that will be directly impacted • The proposed offsets for the impacts, including security and management arrangements	Project proponent	City of Greater Geelong	Prior to undertaking a development project within the portion of Heales Road East subject to process based development or an external infrastructure development project
		85	Secure and manage offset sites in accordance with the eligibility, security and offset management requirements of the *Guidelines for the removal, destruction or lopping of native vegetation* (DELWP, 2017c)(or equivalent). Secure offsets prior to the commencement of works	Project proponent	City of Greater Geelong	Prior to undertaking a development project within the portion of Heales Road East subject to process based development or an external infrastructure development project
Governance						
22	Governance arrangements will be established to implement the Plan, consistent with the Plan's governance framework	86	Establish an NWGGA EPBC Plan Executive Committee as the primary body responsible for overseeing and making key decisions about the implementation of the Plan	City of Greater Geelong	NEPA, DEECA, DTP	Within the first 3 months of Plan implementation

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
		87	Prepare Terms of Reference to set out the purpose, responsibilities, membership and decision-making processes for the NWGGA EPBC Plan Executive Committee	City of Greater Geelong	NEPA, DEECA, DTP	Within the first 3 months of Plan implementation
		88	Establish an Implementation Group as the primary body responsible for day-to-day implementation of the Plan	City of Greater Geelong	-	At beginning of Plan implementation
		89	Consider establishing formal agreements with key support partners to formalise roles and responsibilities	City of Greater Geelong	Support partners identified in the Plan	Agreements established as required
23	A Stakeholder Engagement Strategy will be developed to guide engagement with key stakeholders on implementation of the Plan	90	Include the following in the Stakeholder Engagement Strategy: • Engagement objectives and principles • Key stakeholders and their interests in the Plan • Engagement processes and tools, including an implementation schedule • How the results of engagement will be used to inform improvements to implementation of the Plan, including through the 5-yearly independent evaluation and assurance reviews • Reporting requirements on results of engagement to be included in annual progress reports	City of Greater Geelong	-	Draft provided to NEPA within the first 3 months of Plan implementation

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
Funding						
24	Funding arrangements will be established to fund the implementation of the Plan's commitments and measures over the life of the Plan, consistent with the Plan's funding framework	91	Establish an implementation fund to fund the costs of implementing the Plan's commitments and measures	City of Greater Geelong	-	Prior to development proceeding in the Growth Areas
		92	Establish a biodiversity levy payable by developers in the Growth Areas to fully recover the costs incurred by the city in implementing the Plan's commitments and measures	City of Greater Geelong	-	Prior to development proceeding in the Growth Areas
		93	Determine and implement an appropriate mechanism to collect the biodiversity levy	City of Greater Geelong	-	Prior to development proceeding in the Growth Areas
		94	Establish arrangements to allow developers to provide a Works in Kind (WIK), Land in Kind (LIK) or offsets as a contribution in lieu of the biodiversity levy	City of Greater Geelong	-	Prior to development proceeding in the Growth Areas
		95	Establish governance and administrative arrangements to administer the implementation fund and the collection and application of the biodiversity levy	City of Greater Geelong	-	Prior to development proceeding in the Growth Areas
MERI						
25	A MERI program will be implemented over the life of the Plan, consistent with the Plan's MERI framework	*Monitoring*				
		96	Develop monitoring protocols for each Key Performance Indicator (provided in the Commitments and Measure document) to set out how monitoring will be undertaken	City of Greater Geelong	-	Within the first 12 months of Plan implementation
		97	Establish baseline data for each outcome and commitment based on the data captured from the first monitoring event	City of Greater Geelong	-	Within the first 12 months of Plan implementation

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
		98	Monitor the implementation of commitments and measures annually in accordance with the monitoring protocols	City of Greater Geelong	-	Annually over life of the Plan
		99	Monitor the achievement of outcomes annually or 5-yearly in accordance with the monitoring protocols	City of Greater Geelong	-	Annually or 5-yearly over life of the Plan
		100	Record monitoring data for each monitoring event in an appropriate and readily accessible data management system	City of Greater Geelong	-	Annually over life of the Plan
		Evaluation				
		101	Refine and finalise the draft Evaluation Questions in the Assurance and Implementation Framework prior to the first 5-yearly evaluation	City of Greater Geelong	-	Prior to the first 5-yearly evaluation
		102	Undertake 5-yearly evaluations to: • Determine whether the outcomes of the Plan are being achieved, and if not, the reasons for this • Determine how efficiently and effectively the commitments and measures are being implemented • Make any recommendations for improving the implementation of the Plan as part of adaptive management	City of Greater Geelong (responsible for engaging independent party)	-	Within 12 months after the first full 5 years of Plan implementation, and then within that timeframe every five years following this over the life of the Plan – at year 10, 15, 20 and 25 of the Plan's implementation
		103	Include recommendations in the 5-yearly evaluations for improving the implementation of the Plan where necessary	City of Greater Geelong (responsible for engaging independent party)	-	As part of the 5-yearly evaluations

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
		104	Review the adequacy of Key Performance Indicators and monitoring protocols as part of the 5-yearly evaluations	City of Greater Geelong (responsible for engaging independent party)	-	As part of the 5-yearly evaluations
		105	Undertake an end of Plan evaluation to determine whether: • The Plan's objective was achieved • The Plan's outcomes were achieved • Commitments and measures in the Plan were implemented effectively and efficiently	City of Greater Geelong (responsible for engaging independent party)	-	Within 12 months of the end of Plan implementation
		Reporting				
		106	Prepare annual progress reports to provide information on: • Progress in implementing the commitments and measures • Progress in delivering the development in accordance with the Commonwealth approvals • Revenue and expenditure of funds to implement the Plan • Compliance issues and actions taken	City of Greater Geelong	-	Within 6 months after the end of the first full financial year following Plan implementation, and then within that timeframe every year following this over the life of the Plan
		107	Prepare five-yearly assurance reports to present the results of the five-yearly evaluations	City of Greater Geelong (responsible for engaging	-	Within 12 months after the first full 5 years following Plan implementation, and then within that

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
				independent party)		timeframe every five years following this over the life of the Plan – at year 10, 15, 20 and 25 of the Plan's implementation
		108	Prepare an independent final report for the Plan to present the results of the end of Plan evaluation	City of Greater Geelong (responsible for engaging independent party)	-	Within 12 months of the end of Plan implementation
		109	Make annual progress reports, 5-yearly assurance reports, and the final report for the Plan publicly available on the City's website and provide these reports to the NWGGA EPBC Plan Executive Committee for review and comment prior to public release	City of Greater Geelong	-	Within 1 month following the completion and approval of each of the reports
		Improvement				
		110	Undertake independent 5-yearly evaluations to form the primary trigger point and basis for any necessary adaptive management of the Plan	City of Greater Geelong (responsible for engaging independent party)	-	As part of the 5-yearly evaluations
		111	Establish criteria to determine trigger points for when adaptive management should be considered outside the independent five-yearly evaluation and assurance review process	City of Greater Geelong	-	Within the first 12 months of Plan implementation

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
		112	Prepare adaptive management reports every 5 years for the NWGGA EPBC Plan Executive Committee that includes recommendations for adaptive management actions for endorsement by the committee and a response to recommendations made in the five-yearly assurance report	City of Greater Geelong	-	Every 5 years within 3 months following completion of the draft five-yearly assurance report
		113	Commence implementation of adaptive management actions endorsed by the NWGGA EPBC Plan Executive Committee over the following five-year implementation period of the Plan	City of Greater Geelong	-	Commence implementation within 5 years of endorsement of the adaptive management actions in accordance with the timing specified in the adaptive management reports
		114	Amend the measures or other parts of the implementation documents where necessary to reflect and give effect to the endorsed recommendations	City of Greater Geelong	-	Within 12 months of endorsement of the recommendations
		115	Publish the endorsed adaptive management actions and the proposed timing for implementation of these actions on the City's website, including the reasons why any recommendations in the draft five-yearly assurance report are not being implemented	City of Greater Geelong	-	At the same time as the final five-yearly assurance reports
26	A development registration system will be developed and implemented to track development under the EPBC Part 10 approval	116	Develop a draft outline for a development registration system that sets out: • How the City will monitor developments using the EPBC Part 10 approval • Processes to ensure regulated third-parties (developers) are aware of their responsibilities under the Plan	City of Greater Geelong	Developers	Within the first 12 months of Plan implementation

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
			• The trigger points for registration using an appropriate step in the Victorian planning system • The information that developers are required to provide to the City about their action, including how it is consistent with the requirements of the Plan			
		117	Provide the draft outline of the registration system to the EPBC Plan Executive Committee and NEPA for consideration and comment prior to its finalisation and approval by the City	City of Greater Geelong	Developers	Finalisation and approval within 6 months of providing the draft to the EPBC Plan Executive Committee and NEPA
Compliance						
27	A compliance program will be implemented over the life of the Plan, consistent with the Plan's compliance framework	118	Develop a series of educational materials to inform the public about the Plan and help support regulated third parties to comply with the Commonwealth approval conditions	City of Greater Geelong	-	Within the first 6 months of Plan implementation
		119	Collect compliance monitoring data in accordance with the MERI Framework, including through establishing Key Performance Indicators for compliance and developing monitoring protocols for each compliance KPI	City of Greater Geelong	Other relevant regulatory authorities	Annually over life of the Plan
		120	Create and fund a position whose responsibilities include landowner education and liaison and support to the City's existing compliance team	City of Greater Geelong	-	Within the first 12 months of Plan implementation

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
		121	Undertake a compliance risk assessment to prioritise compliance issues into risk categories and update the assessment every 5 years to respond to any changes in risks as part of the five-yearly evaluation	City of Greater Geelong	-	Within the first 18 months of Plan implementation
		122	Develop a decision framework to guide the taking of compliance action against regulated third-parties in a way that is proportionate to the risk, as determined through the compliance risk assessment	City of Greater Geelong	Other relevant regulatory authorities	Within the first 2 years of Plan implementation
		123	Where a potential non-compliance is identified in relation to the delivery of commitments or measures that the City or a support partner is responsible for: • Notify NEPA of the non-compliance as soon as possible • If the non-compliance is identified as high risk, provide NEPA with a plan setting out the compliance actions proposed to be taken to rectify the non-compliance and the timing for implementing these actions within 3 months • For other non-compliance risk categories, undertake compliance actions appropriate to the risk category and respond to any requirements of NEPA in relation to the non-compliance within a reasonable timeframe • Report to NEPA regularly on progress in implementing the compliance actions	City of Greater Geelong	Other relevant regulatory authorities	As soon as reasonably possible following any non-compliance

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
		124	Where a potential non-compliance is identified in relation to a regulated third-party taking approved actions under the endorsed Plan: • Undertake an initial assessment of the potential non-compliance • Notify NEPA of the non-compliance following the initial assessment as soon as possible • Respond to the non-compliance in accordance with the decision framework for taking compliance action • Report to NEPA regularly on progress in implementing the compliance actions	City of Greater Geelong	Other relevant regulatory authorities	As soon as reasonably possible following any non-compliance
		125	Undertake regular reporting on compliance in accordance with the MERI Framework, including: • Reporting in annual progress reports on: • Any measures taken by the City to support voluntary compliance • Number of non-compliances for the reporting period and the nature of the non-compliance • Any compliance action taken by the City or other relevant responsible regulatory authority to each high-risk non-compliance and the outcomes of the compliance action taken • Reporting in five-yearly independent assurance reports on: • Analysis and key findings on extent of compliance with the Commonwealth conditions of approval	City of Greater Geelong	Other relevant regulatory authorities	Annually for annual progress reports or five-yearly for independent assurance reports

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
			• Any recommendations for improving the implementation of the Plan, including compliance			
Data sharing						
28	A data management and sharing agreement will be developed to set out how data associated with the Plan will be managed and shared	126	Prepare a draft data sharing agreement for review and comment by NEPA	City of Greater Geelong	-	Within the first 12 months of Plan implementation

Table 2-3: Commitments for the Plan and their associated KPIs

No.	Commitment	Key performance indicators
Delivery of development		
1	Development within the Strategic Assessment Area will proceed in accordance with any Commonwealth approval conditions and in accordance with the EPBC Plan and NWGGA Biodiversity Conservation Strategy	a) Number of developments tracked using the Part 10 approval under the Plan
		b) Number of non-compliances with the Commonwealth approval conditions and in accordance with the EPBC Plan and NWGGA Biodiversity Conservation Strategy reported to the Commonwealth
2	Proposed minor changes to the boundaries of land subject to development (as shown in Figure 4-1 of the Plan) will meet the eligibility for consideration and be in accordance with the process for considering changes set out in Section 4.5 of the Plan	c) Percentage of planning proposals requiring a boundary change to the land subject to development which were reviewed against the eligibility for consideration and follow the process for considering changes set out in Section 4.5 of the Plan
3	Development within the portion of Heales Road East subject to process based development (as shown in Figure 4-1 of the Plan) and external infrastructure development will only proceed if undertaken in accordance with the requirements for process based development in Section 6.3 of the Plan.	d) The number of process based development projects for which a report has been provided to the Executive Committee prior to development occurring in accordance with 6.3 of the Plan.
Conservation		
4	The Northern Conservation Area will be established in perpetuity to avoid and protect 50.5 ha of habitat for Striped Legless Lizard, 82 ha of habitat for Golden Sun Moth, and 81 ha of habitat potentially important for the recovery of Victorian Grassland Earless Dragon	e) Extent of the Northern Conservation Area established and secured in perpetuity
		f) Hectares of Striped Legless Lizard habitat protected in the Northern Conservation Area
		g) Hectares of Golden Sun Moth habitat protected in the Northern Conservation Area
		h) Hectares of land potentially suitable for the recovery of Victorian Grassland Earless Dragon protected in the Northern Conservation Area
5	A Conservation Management Plan will be prepared by a suitably qualified environmental professional and implemented for the protection and ongoing management of Striped Legless Lizard, Golden Sun Moth and Victorian Grassland Earless Dragon within the Northern Conservation Area	i) The extent to which a Conservation Management Plan for the protection and ongoing management of Striped Legless Lizard, Golden Sun Moth and potentially suitable areas for the recovery of Victorian Grassland Earless Dragon within the Northern Conservation Area has been prepared
		j) The extent to which the objectives of the Conservation Management Plan are achieved

No.	Commitment	Key performance indicators
6	The Eastern Conservation Area will be established in perpetuity to avoid and protect 5.5 ha of habitat for Natural Temperate Grassland	k) Extent of the Eastern Conservation Area established and secured in perpetuity
		l) Hectares of Natural Temperate Grassland habitat protected in the Eastern Conservation Area
7	A Conservation Management Plan will be prepared by a suitably qualified environmental professional and implemented for the protection and ongoing management of Natural Temperate Grassland within the Eastern Conservation Area	m) The extent to which a Conservation Management Plan for the protection and ongoing management of Natural Temperate Grassland within the Eastern Conservation Area has been prepared
		n) The extent to which the objectives of the Conservation Management Plan are achieved
8	The gully avoidance area will avoid 3.5 ha of habitat for Striped Legless Lizard, 7 ha of habitat for Golden Sun Moth and 2.5 ha of Natural Temperate Grassland	o) Extent of habitat for Golden Sun Moth that is avoided within the gully avoidance area
		p) Extent of habitat for Striped Legless Lizard that is avoided within the gully avoidance area
		q) Extent of Natural Temperate Grassland that is avoided within the gully avoidance area
9	The Cowies Creek Conservation Area will be established in perpetuity to avoid and protect habitat needed to support the continued persistence of the Growling Grass Frog and potential habitat for Glossy Grass Skink in the WGGA	r) Extent of the Cowies Creek Conservation Area which has been established and secured in perpetuity
10	A Conservation Management Plan will be prepared by a suitably qualified environmental professional and implemented for the protection and ongoing management of Growling Grass Frog, and areas of potential habitat for Adamson's Blown-grass and Glossy Grass Skink within the Cowies Creek Conservation Area	s) The extent to which a Conservation Management Plan for the protection and ongoing management of Growling Grass Frog, and areas of potential habitat for Adamson's Blown-grass and Glossy Grass Skink within the Cowies Creek Conservation Area has been prepared
		t) The extent to which the objectives of the Conservation Management Plan are achieved
11	Habitat enhancement works for the Growling Grass Frog will be undertaken in Cowies Creek downstream of the WGGA to support the: • Long-term viability of the Cowies Creek metapopulation of Growling Grass Frogs • Persistence of the species within the WGGA	u) Extent of habitat enhancement works that have been undertaken for the Growling Grass Frog downstream of the WGGA

No.	Commitment	Key performance indicators
12	Development within the Moorabool avoidance area will be restricted to support the potential MNES values of the river corridor and the escarpment	v) The extent of development that has been undertaken within the Moorabool avoidance area
		w) The type of development actions that have been undertaken within the Moorabool avoidance area
13	Standard mitigation measures will continue to be implemented to minimise the indirect impacts of the development on MNES in accordance with the requirements of the *Greater Geelong Planning Scheme* (The City of Greater Geelong, 2022), as updated from time to time, and generally in accordance with the Framework Plan (The City of Greater Geelong, 2021)	x) The number of PSPs and permit conditions that have incorporated relevant standard mitigation measures
14	The following additional specific mitigation measures will be implemented to minimise the indirect impacts of development on the strategic conservation areas and avoidance areas: • Establish a conservation interface for land abutting conservation areas and avoidance areas • Design and baffle public lighting in accordance with National Light Pollution Guidelines for Wildlife to prevent light spill and glare within the Cowies Creek Conservation Area • Ensure the Construction Environmental Management Plans for construction works on land immediately adjacent to the conservation areas have specific regard to the CMP for the adjoining land	y) The number of PSPs and permit conditions that have include the specific mitigation measures where required.

No.	Commitment	Key performance indicators
15	Additional specific mitigation measures will be implemented to minimise the indirect impacts of the development on MNES associated with waterways, riparian areas and wetlands including: • EPBC listed threatened and migratory birds • *Galaxiella toourtkoourt* (Little Galaxias) • *Ranoidea raniformis* (Growling Grass Frog) • *Nannoperca obscura* (Yarra Pygmy Perch) • *Prototroctes maraena* (Australian Grayling) • *Pseudemoia rawlinsoni* (Glossy Grass Skink) • *Lachnagrostis adamsonii* (Adamson's Blown-grass) • Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar site	z) Number of precincts for which technical studies have been undertaken to understand the key risks from development on protected matters associated with Hovells Creek and the Moorabool River
		a.a) Number of precincts that have prepared guidelines based on the results of the technical studies to guide the preparation of the PSP and decisions on planning permits and permit conditions, to ensure risks to protected matters in relation to indirect and downstream impacts are adequately managed
		a.b) Number of precincts for which planning scheme amendments (or another appropriate planning mechanism) has been completed to ensure the guidelines are considered during the preparation of PSPs and in decisions on planning permits and permit conditions
		a.c) Number of relevant actions which have designed stormwater infrastructure and ongoing stormwater management in accordance with the Growling Grass Frog Habitat Design Standards (DELWP, 2017) and any other relevant advice or standards to minimise potential adverse impacts to habitat for the Growling Grass Frog and Glossy Grass Skink within downstream reaches of Cowies Creek
16	Offset sites will be established to meet the following requirements: • 21 ha of Natural Temperate Grassland • 342 ha of known habitat for Striped Legless Lizard • 506 ha of known habitat for Golden Sun Moth These offsets will be delivered through a combination of: • The Northern and Eastern Conservation Areas (Commitments 4 and 6), and • Strategic offset locations outside of the NGGA to meet the balance of the offset requirements • Works in Kind, Land in Kind or Offsets in Kind arrangements where appropriate	a.d) Hectares of Natural Temperate Grassland protected and managed in offset sites established under the Plan
		a.e) Hectares of known habitat for Striped Legless Lizard protected and managed in offset sites established under the Plan
		a.f) Hectares of known habitat for Golden Sun Moth protected and managed in offset sites established under the Plan

No.	Commitment	Key performance indicators
17	The Victorian Grassland Earless Dragon Trust Fund will be established. A total amount of $12.7 million will be paid into the Trust Fund, to contribute to the recovery efforts of the species. Funding for the trust will include: • $1 million at establishment of the Trust Fund • $11.7 million paid via annual contributions, the final payment occurring before the end of Year 25 of the Plan	a.g) Extent to which The Victorian Grassland Earless Dragon Trust Fund is established and implemented in accordance with the Plan (Measure 66)
		a.h) Amount (AUD) of funding provided at establishment of the Trust Fund
		a.i) Total amount (AUD) of funding provided into the Trust Fund before the end of Year 25 of the Plan
18	Offset delivery will keep pace with and occur ahead of impacts within the NGGA	a.j) Percentage of development impacts that have occurred under the Plan
		a.k) Percentage of offsets delivered under the Plan
External infrastructure		
19	Development within the portion of Heales Road East subject to process based development (as shown in Figure 4-1 of the Plan) will be designed and located to prioritise avoidance of impacts to MNES and native vegetation. This must ensure that any confirmed population or occurrence of MNES that would be considered important or notable (for instance, due to size, condition or potential contribution to the recovery of the MNES) is avoided and subsequently protected, maintained and managed to ensure the persistence of that population or occurrence in the long-term. Impacts to all other populations or occurrences will be avoided and minimised as far as practical	a.l) The number of development projects within the portion of Heales Road East subject to process based development that have been designed and located to avoid impacts to MNES and native vegetation
		a.m) The number of development projects within the portion of Heales Road East subject to process based development for which any important or notable occurrences of MNES have been avoided
20	External infrastructure development will be designed and located to prioritise avoidance of impacts to MNES and native vegetation. The following specific avoidance outcomes will be delivered:	a.n) The number of external infrastructure projects that have been designed and located to avoid impacts to MNES and native vegetation

No.	Commitment	Key performance indicators
	• Spiny Rice-flower – any confirmed population or part of the population must be avoided and will be protected, maintained and managed to ensure the persistence of that population in the long-term • Victorian Grassland Earless Dragon - any confirmed population or part of the population must be avoided and will be protected, maintained and managed to ensure the persistence of that population in the long-term; and the recovery team will be notified • Other MNES – any confirmed population or occurrence that would be considered important or notable (for instance, due to size, condition or potential contribution to the recovery of the MNES) must be avoided and will be protected, maintained and managed to ensure the persistence of that population or occurrence in the long-term. Impacts to all other populations or occurrences will be avoided and minimised as far as practical	a.o) The number of external infrastructure projects for which the specific avoidance outcomes have been achieved
21	Unavoidable clearing of any areas confirmed to support MNES due to development within the portion of Heales Road East subject to process based development (as shown in Figure 4-1 of the Plan) or external infrastructure development will be offset in accordance with the EPBC Act Environmental Offsets Policy and associated Offsets Assessment Guide (or equivalent) (Commonwealth of Australia, 2012; DSEWPC, 2012)	a.p) Area of offsets delivered for process based development projects
		a.q) Extent of unavoidable clearing of areas confirmed to support MNES that has occurred for process based development projects
Governance		
22	Governance arrangements will be established to implement the Plan, consistent with the Plan's governance framework	a.r) Extent to which governance arrangements have been established in accordance with the Plan's governance framework
23	A Stakeholder Engagement Strategy will be developed to guide engagement with key stakeholders on implementation of the Plan	a.s) The extent to which a Stakeholder Engagement Strategy for the Plan has been prepared
Funding		
24	Funding arrangements will be established to fund the implementation of the Plan's commitments and measures over the life of the Plan, consistent with the Plan's funding framework	a.t) Extent to which funding arrangements have been established in accordance with the Plan's funding framework
MERI		
25	A MERI program will be implemented over the life of the Plan, consistent with the Plan's MERI framework	a.u) The extent to which a MERI program, consistent with the Plan's MERI framework, is implemented

No.	Commitment	Key performance indicators
26	A development registration system will be developed and implemented to track development under the EPBC Part 10 approval	a.v) The extent to which a development registration system has been developed to track development under the EPBC Part 10 approval
		a.w) The extent to which the development registration system has been implemented to track development under the EPBC Part 10 approval
Compliance		
27	A compliance program will be implemented over the life of the Plan, consistent with the Plan's compliance framework	a.x) The extent to which a compliance program, consistent with the Plan's compliance framework, is implemented.
Data sharing		
28	A data management and sharing agreement will be developed to set out how data associated with the Plan will be managed and shared	a.y) The extent to which a data management and sharing agreement has been developed to set out how data associated with the Plan will be managed and shared

3 Objective, outcomes, commitments and measures under the BCS

This section provides the state and local level objectives and outcomes, as detailed in the BCS. A detailed set of measures is then provided for each of the commitments under the BCS. These measures are to enable adequate implementation of the BCS and achievement of the outcomes and objective of the BCS.

Although some national level outcomes, commitments and measures (provided in Section 2) are also relevant to the BCS, they are not repeated in this section.

3.1 OBJECTIVE OF THE BCS

The objective of the BCS is to:

Provide genuine, long-term, positive outcomes for the national, state and local biodiversity values that are present within the Growth Areas

3.2 OUTCOMES OF THE BCS

The outcomes specific to the BCS and their associated KPIs are set out in Table 3-1. These outcomes recognise that the national level outcomes will also provide a range of benefits to state and local values, and seek to minimise duplication by focusing on the additional positive impacts or changes to biodiversity values that are needed at the state and local level.

Table 3-1: Outcomes specific to the BCS

No.	Outcome	Key performance indicators
i	Strategic conservation areas within the Growth Areas are protected and managed to provide for the long-term protection of biodiversity values	a) Extent of strategic conservation areas protected within the Growth Areas
		b) Extent of strategic conservation areas subject to management within the Growth Areas
ii	Precinct design and delivery enhances biodiversity and connectivity within the Growth Areas	c) Extent of landscape connections that are identified in PSPs
iii	Biodiversity offsets for impacts to state values are calculated at the precinct scale and provided as development proceeds	d) Delivery of offsets for state values
iv	Implementation of the BCS is effective, timely, and cost efficient	e) Efficiency of the BCS's commitments
		f) Effectiveness of the BCS's commitments

3.3 COMMITMENTS AND MEASURES FOR THE BCS

The commitments and measures specific to the BCS are set out in Table 3-2, including responsibility, support partner(s) and timing. The KPIs for the commitments are provided in Table 3-3.

Table 3-2: Commitments and measures specific to the BCS

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
i	Conservation Management Plans will be prepared and implemented for the protection and ongoing management of biodiversity values within each of the strategic conservation areas	i	Where appropriate, undertake ecological surveys of the strategic conservation areas to inform development of the Conservation Management Plan and establish year 1 baseline data	City of Greater Geelong	Relevant landholder(s)	Within 1 year of establishment of the conservation areas
		ii	Include the following information in the Conservation Management Plan for the Moorabool River Corridor: • Boundary of the conservation area • Native vegetation to be retained as identified in the NVPP • Any locations suitable for public access points, walking paths/trails, and passive recreation • Any locations suitable for water management assets and associated infrastructure • Management actions and arrangements to protect and restore biodiversity values, including methods, standards and techniques, roles and responsibilities, timing for implementation, funding and monitoring and reporting	City of Greater Geelong	Corangamite CMA	Within 1 year of establishment of the conservation areas
ii	The following additional specific mitigation measures will be implemented to minimise the indirect impacts of development on the strategic conservation areas and avoidance areas:	iii	Identify a conservation interface between urban development and the boundaries of the strategic conservation areas and avoidance areas within relevant PSPs. The conservation interfaces must be established in accordance with relevant principles and standards set out in Section 4.4.2 of the BCS	City of Greater Geelong	-	At PSP preparation stage for the relevant precinct

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
	• Establish a conservation interface for land abutting conservation areas and avoidance areas • Design and baffle public lighting in accordance with National Light Pollution Guidelines for Wildlife to prevent light spill and glare within the Cowies Creek Conservation Area • Ensure the Construction Environmental Management Plans for construction works on land immediately adjacent to the conservation areas have specific regard to the CMP for the adjoining land	iv	Include the design and baffle of public lighting as a requirement or guideline in PSPs and/or as a condition on permits for land use, subdivision and development, as appropriate	City of Greater Geelong	-	At PSP preparation stage for the relevant precinct
		v	Include the requirement for Construction Environmental Management Plans on land immediately adjacent to the strategic conservation areas to have specific regard to the CMP for the adjoining land as a requirement or guideline in PSPs and/or as a condition on permits for land use, subdivision and development, as appropriate. The purpose of these plans is to ensure that appropriate measures are put in place to mitigate the potential indirect impacts of construction on the MNES values within the strategic conservation areas. The Plans should stipulate the measures that will be undertaken and the monitoring and reporting that will be undertaken to ensure appropriate implementation	City of Greater Geelong	-	At PSP preparation stage (for conditions included as requirements and guidelines in PSPs) and at the planning permit stage (for conditions included as permit conditions)
		vi	Monitor and report on the inclusion of the specific mitigation measures in PSPs and as conditions on permits, as part of the monitoring program and annual progress reporting under the MERI framework	City of Greater Geelong	-	As part of annual progress reporting
iii	State offsets to compensate for the loss to biodiversity from the removal of native vegetation will be provided in accordance with the *Guidelines for the removal, destruction or lopping of native vegetation* (DELWP, 2017c)	vii	Undertake surveys within each PSP prior to development	City of Greater Geelong	DEECA	At PSP preparation stage for the relevant precinct
		viii	Determine State offset requirements at the precinct level in accordance with the *Guidelines for the removal, destruction or lopping of native vegetation* (DELWP, 2017c)	City of Greater Geelong	DEECA	At PSP preparation stage for the relevant precinct
		ix	Confirm State offset requirements through the NVPP for each precinct	City of Greater Geelong	DEECA	At PSP preparation stage for the relevant precinct

No.	Commitment	No.	Measure	Responsibility	Key support partner(s)	Timing
		x	Secure offsets in accordance with the eligibility, security and offset management requirements of the *Guidelines for the removal, destruction or lopping of native vegetation* (DELWP, 2017c) (or equivalent). Secure offsets prior to the commencement of works.	Project proponent	City of Greater Geelong	Prior to the removal of vegetation

Table 3-3: Commitments for the BCS and their associated KPIs

No.	Commitment	Key performance indicators
i	Conservation Management Plans will be prepared and implemented for the protection and ongoing management of biodiversity values within each of the strategic conservation areas	a) The number of strategic conservation areas for which a Conservation Management Plan (for the protection and ongoing management of biodiversity values) has been prepared
		b) The number of strategic conservation areas for which a Conservation Management Plan (for the protection and ongoing management of biodiversity values) is being implemented
ii	The following additional specific mitigation measures will be implemented to minimise the indirect impacts of the development on the environmental values of the strategic conservation areas: • Establish a conservation interface for each strategic conservation area • Design and baffle public lighting in accordance with National Light Pollution Guidelines for Wildlife to prevent light spill and glare within the strategic conservation areas • Prepare Construction Environmental Management Plans for construction works on land immediately adjacent to the strategic conservation areas	c) The number of strategic conservation areas that have implemented/are implementing the specific additional mitigation measure where required.
iii	State offsets to compensate for the loss to biodiversity from the removal of native vegetation will be provided in accordance with the *Guidelines for the removal, destruction or lopping of native vegetation* (DELWP, 2017c)	d) Delivery of offsets for state values

References

Commonwealth of Australia (2012) 'How to use the offsets assessment guide'.

DELWP (2017a) 'Growling Grass Frog Crossing Design Standards Melbourne Strategic Assessment'. Department of Environment, Land, Water and Planning.

DELWP (2017b) 'Growling Grass Frog Habitat Design Standards Melbourne Strategic Assessment'. Department of Environment, Land, Water and Planning.

DELWP (2017c) 'Guidelines for the removal, destruction or lopping of native vegetation'.

DEPI (2013) 'Biodiversity Conservation Strategy for Melbourne's Growth Corridors'.

DoE (2014) 'Environmental Management Plan Guidelines 2014'. Commonwealth Department of the Environment.

DSEWPC (2012) 'Environment Protection and Biodiversity Conservation Act 1999 Environmental Offsets Policy'.

The City of Greater Geelong (2021) 'The Northern and Western Geelong Growth Areas Framework Plan.'

The City of Greater Geelong (2022) 'Greater Geelong Planning Scheme'.

THE CITY OF
GREATER GEELONG

NORTHERN AND WESTERN GEELONG GROWTH AREAS

BIODIVERSITY CONSERVATION STRATEGY

JULY 2026

CITY OF GREATER GEELONG

ACKNOWLEDGEMENT OF COUNTRY

Greater Geelong is located on the traditional lands of the Wadawurrung people. The land was created by the great ancestor spirit, Bunjil, the wedge-tailed eagle. Wadawurrung territory extends from the great dividing range in the north to the coast around Port Phillip Bay.

The City acknowledges the Wadawurrung people as the traditional owners of this land who to this day practice their culture and uphold the dignity of their ancestors.

DOCUMENT TRACKING

This document was prepared on behalf of the City of Greater Geelong by Biosis and Open Lines.

PREPARED BY:	
Open Lines, Biosis	
REVIEWED BY:	
Mitchell Deaves (Biosis) Peter Hemphill, Heather Tolley, Tom Holden (Open Lines)	
VERSION CONTROL:	
VERSION:	Final
DATE:	July 2026

Contents

1 INTRODUCTION 1

1.1 Purpose of the BCS 1

1.2 Area covered by the BCS 2

1.3 Structure of the BCS 2

2 BIODIVERSITY OUTCOMES AND GUIDING PRINCIPLES 4

2.1 Biodiversity outcomes 4

2.2 Guiding principles 6

3 BIODIVERSITY VALUES AND THREATS 8

3.1 Landscape context 8

3.2 Biodiversity values within the Growth Areas 12

3.3 Key threats to biodiversity values within the Growth Areas 28

4 CONSERVATION PROGRAM 30

4.1 Introduction 30

4.2 Policy context 30

4.3 Avoidance and minimisation of impacts 34

4.4 Mitigation of impacts 51

4.5 Residual impacts and offsets 54

5 IMPLEMENTATION 58

6 ASSURANCE 60

REFERENCES 61

APPENDIX A: ASSESSMENT AGAINST STATE PLANNING AND REGULATORY REQUIREMENTS FOR BIODIVERSITY

List of Figures

Figure 1-1: Area covered by the BCS 3

Figure 3-1: Key landforms 9

Figure 3-2: Protected areas 11

Figure 3-3: Native vegetation, TECs, and threatened flora in the NGGA 14

Figure 3-4: Native vegetation and threatened flora in the WGGA 15

Figure 3-5: Striped Legless Lizard records and habitat in the NGGA 21

Figure 3-6: Golden Sun Moth records and habitat in the NGGA 22

Figure 3-7: Golden Sun Moth habitat categories in the NGGA 23

Figure 3-8: Growling Grass Frog records and habitat 24

Figure 3-9: Potentially suitable areas for Victorian Grassland Earless Dragon 25

Figure 3-10: Glossy Grass Skink habitat 26

Figure 3-11: Hydrological values of the WGGA 27

Figure 4-1: Biodiversity areas within the NGGA 40

Figure 4-2: Northern Conservation Area 41

Figure 4-3: Eastern Conservation Area and gully avoidance area 42

Figure 4-4: Biodiversity areas within the WGGA 45

Figure 4-5: Cowies Creek Conservation Area and Growling Grass Frog 46

Figure 4-6: Cowies Creek Conservation Area and Glossy Grass Skink 47

Figure 4-7: Moorabool River corridor and Moorabool avoidance area 48

List of Tables

Table 2-1: National level biodiversity outcomes (taken from the EPBC Plan) 5

Table 2-2: State and local level biodiversity outcomes 5

Table 2-3: Implementation outcome 5

Table 3-1: Total area of EVCs present within the Growth Areas 13

Table 4-1: Key policy considerations for the City 31

Table 4-2: Key biodiversity actions from the Framework Plan for the Growth Areas 35

Table 4-3: National level commitments in relation to avoidance 37

Table 4-4: State level commitment in relation to avoidance 38

Table 4-3: National level commitments in relation to mitigation 51

Table 4-4: State level commitment in relation to mitigation 52

Table 4-5: National level commitments in relation to offsets 55

Table 4-6: State level commitment in relation to offsets 56

Table 4-7: Consideration of criteria in Table 11 of the Assessor's Handbook 57

Table 5-1: Steps to implement the conservation program and commitments from the BCS 58

Abbreviations and terms

Acronyms	Meaning
BCS	Biodiversity Conservation Strategy
DCCEEW	Commonwealth Government Department of Climate Change, Energy, the Environment and Water (DCCEEW)
DEECA	Victorian Government Department of Energy, Environment and Climate Action
DELWP	The former Victorian Government Department of Environment, Land, Water and Planning (now DEECA and DTP)
DTP	Victorian Government Department of Transport and Planning
EPBC Act	Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*
FFG Act	Victorian *Flora and Fauna Guarantee Act 1988*
FPAL	Finalised priority assessment list
GGF	Growling Grass Frog (*Ranoidea raniformis*)
GGS	Glossy Grass Skink (*Pseudemoia rawlinsoni*)
GSM	Golden Sun Moth (*Synemon plana*)
IBRA	Interim Biogeographic Regionalisation for Australia
KPI	Key Performance Indicator
LGA	Local Government Area
MERI	Monitoring, evaluation, reporting and improvement
MNES	Matters of National Environmental Significance
NEPA	National Environmental Protection Agency
NGGA	Northern Geelong Growth Area
NVPP	Native Vegetation Precinct Plan
NWGGA	Northern and Western Geelong Growth Areas
P&E Act	Victorian *Planning and Environment Act 1987*
PPF	Planning Policy Framework
PSP	Precinct Structure Plan
SAR	Strategic Assessment Report
SLL	Striped Legless Lizard (*Delma impar*)
TEC	Threatened ecological community
ToR	Terms of Reference
UGZ	Urban Growth Zone
VGED	Victorian Grassland Earless Dragon (*Tympanocryptis pinguicolla*)
VPP	*Victoria Planning Provisions*
WBPG	Western (Basalt) Plains Grassland vegetation community
WGGA	Western Geelong Growth Area
WIK	Works in Kind

Terms / Abbreviations	Definition
BCS guiding principles	A set of principles to guide both the preparation of the BCS and the decisions that will need to be made as part of the strategy's implementation
Biodiversity areas	Biodiversity areas support biodiversity values within the Growth Areas and provide opportunities to protect, manage and restore biodiversity. Biodiversity Areas are identified in the BCS as: • Strategic conservation areas • Avoidance areas • Landscape connections
Conservation Management Plan	The document used to provide for the protection and ongoing management of the biodiversity values within each strategic conservation area
Construction Environmental Management Plans	A plan developed to ensure appropriate environmental management practices are implemented during the construction phase of a project
Cowies Creek Conservation Area	The section of Cowies Creek within the WGGA to be protected and managed for conservation purposes under the EPBC Plan
Development land	Specified land within the Strategic Assessment Area where development under the EPBC Plan is proposed to occur
Development under the EPBC Plan	The broad term used to describe all development occurring under the EPBC Plan. This includes the following classes of actions: • Urban and commercial development • Industrial development • Rural development • Supporting infrastructure and services • Environmental management
Eastern Conservation Area	Area of land within the NGGA to be avoided for conservation purposes under the EPBC Plan
External infrastructure	Development comprising the supporting infrastructure and services class of action and the environmental management class of action that is located outside of Growth Areas but within the Strategic Assessment Area
Gully avoidance area	Area of land within the NGGA to be avoided under the EPBC Plan
Landscape Connection	Area of land with the NWGGA where the urban structure and landscape design facilitates green and blue infrastructure and co-benefits to biodiversity through the use of biodiversity sensitive urban design approaches
Land subject to development	Development land within the Growth Areas subject to all classes of actions under the EPBC Plan
Moorabool avoidance area	Area of land within the WGGA to be avoided under the EPBC Plan
Moorabool River corridor	Area of land within the WGGA to be avoided under the EPBC Plan
Natural Temperate Grassland	The nationally threatened ecological community Natural Temperate Grassland of the Victorian Volcanic Plain
Northern Conservation Area	Area of land within the NGGA to be avoided for conservation purposes under the EPBC Plan
Specific mitigation measures	Additional mitigation measures beyond those delivered through the existing planning system to address specific risks to MNES associated with the implementation of the EPBC Plan
Stakeholder engagement strategy	A process for stakeholder engagement to guide the City in undertaking ongoing engagement with key stakeholders over the life of the EPBC Plan

Terms / Abbreviations	Definition
Standard mitigation measures	Mitigation measures delivered by the Victorian planning system through the PSP process, existing provisions in the Greater Geelong Planning Scheme, and the planning permit process
Strategic conservation area	Areas within the Growth Areas that will be avoided from development and protected and managed for conservation in-perpetuity
The City	The City of Greater Geelong
The EPBC Plan	The Northern and Western Geelong Growth Areas EPBC Plan
The Executive Committee	The Northern and Western Geelong Growth Areas EPBC Plan Executive Committee
The Framework Plan	*Northern and Western Geelong Growth Area Framework Plan*
The Growth Areas	Northern and Western Geelong Growth Areas
The Minister	Commonwealth Minister for the Environment and Water
Works in Kind	A contribution in lieu of payment of the biodiversity levy amount

1 Introduction

The City of Greater Geelong (the City) has identified two key areas for urban growth in Geelong's northwest, known as the Northern and Western Geelong Growth Areas (the Growth Areas). The Growth Areas were identified through several State planning strategies for future growth. The City subsequently developed the *Northern and Western Geelong Growth Areas Framework Plan* (the Framework Plan) (The City of Greater Geelong, 2021). The Framework Plan describes the existing site context of the Growth Areas and sets out:

- Broad future urban structure of the Growth Areas, including potential areas suitable for environmental protection
- A vision and set of urban development objectives for each Growth Area
- A set of actions to be implemented through future planning processes

Development within the Growth Areas will lead to impacts to biodiversity values of national, State and local significance. This Biodiversity Conservation Strategy (BCS) has been developed to address these impacts and guide the delivery of positive outcomes for the biodiversity values that are present within the Growth Areas.

The Victorian planning system under the *Planning and Environment Act 1987* (P&E Act) is the key delivery framework for development within the Growth Areas and the implementation of the BCS.

To further support development in the Growth Areas and to protect matters of national environmental significance (MNES), the City has undertaken a strategic assessment under Part 10 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). This enabled a landscape scale assessment and approval of a suite of development actions under the EPBC Act and provided the opportunity to deliver improved environmental and development outcomes compared to project-by-project assessments through strategic consideration of biodiversity issues.

To give effect to the strategic assessment process, the City prepared the *Northern and Western Geelong Growth Areas EPBC Plan* (the EPBC Plan). The BCS forms an implementation document for this Plan.

For further information and context about the strategic assessment, please refer to the NWGGA:

- EPBC Plan for a full description of the strategic assessment including development, conservation, and assurance
- Strategic Assessment Report (SAR) for a detailed assessment of the impacts of development in the Growth Areas on MNES and evaluation of the commitments and measures to address these impacts
- Funding Program for details about how implementation of the EPBC Plan will be funded
- Commitments and Measures document for the specific commitments and measures that will be implemented

1.1 PURPOSE OF THE BCS

The purpose of the BCS is to:

- Identify the national, State and local biodiversity values that are present in the Strategic Assessment Area and set out a conservation program for providing genuine, long-term positive results for those biodiversity values
- Set out how the conservation elements of the EPBC Plan for the Strategic Assessment Area will be implemented including through avoiding and minimising, mitigating, and offsetting residual impacts in accordance with the mitigation hierarchy (DSEWPC, 2012; DELWP, 2017c)
- Guide the preparation of Precinct Structure Plans (PSPs) and subsequent development within the Strategic Assessment Area to ensure the outcomes are consistent with State biodiversity policy

The Growth Areas have been identified as key locations for urban growth in Geelong and some level of impact to biodiversity is unavoidable within this context. This strategy focuses conservation efforts on the most important biodiversity values and integrating actions to improve biodiversity within urban areas where this is appropriate.

The BCS satisfies the delivery of two key actions (Action N1.3.1 and W1.3.1) of the Framework Plan for the protection of biodiversity in the Growth Areas. The Framework Plan states that an "overarching biodiversity conservation strategy will be prepared for the growth area[s] that provides high level guidance for the management of nationally and State significant biodiversity values. The strategy will spatially identify how outcomes for matters of national environmental significance will be delivered…" (The City of Greater Geelong, 2021).

While the BCS helps identify how the conservation elements of the EPBC Plan will be implemented, it does not form part of the Plan to be endorsed by the Minister under Part 10 of the EPBC Act.

1.2 AREA COVERED BY THE BCS

The area covered by the BCS is the same area covered by the EPBC Plan, known as the Strategic Assessment Area, and is shown in Figure 1-1.

The area covered includes the:

- Northern Geelong Growth Area (NGGA) – this covers 2,107 ha and occurs in the Lovely Banks locality
- Two northern precincts within the Western Geelong Growth Area (WGGA) located north of the Midland Highway (Creamery Road and Batesford North), which covers 769 ha and occurs in the Bell Post Hill/Batesford localities

The remaining precincts of the WGGA (comprising the Batesford South, McCanns Lane, and Merrawarp Road precincts) have been excluded from the strategic assessment and the BCS due to a lack of information and resolution relating to a range of factors needed to support and rationalise a full assessment. This includes the anticipated development demand and timing, and the detailed plans for decommission and rehabilitation of the active Batesford Quarry. It is envisaged that separate strategic planning and assessment and approval processes will occur for the remaining WGGA land.

The BCS does not address the areas that relate to the external infrastructure class of action which will occur outside the Growth Areas, and which is dealt with in the EPBC Plan.

1.3 STRUCTURE OF THE BCS

The BCS is structured as follows:

- Section 2 defines the biodiversity outcomes that will be delivered and the principles that guide both the preparation and implementation of the BCS
- Section 3 describes the biodiversity values and threats relevant to the Strategic Assessment Area
- Section 4 describes the conservation program relating to the Strategic Assessment Area
- Section 5 describes the steps required to implement the conservation program and commitments from the BCS
- Section 6 summarises the approach to assurance for the BCS
- Appendix A provides an assessment against State planning and regulatory requirements for biodiversity

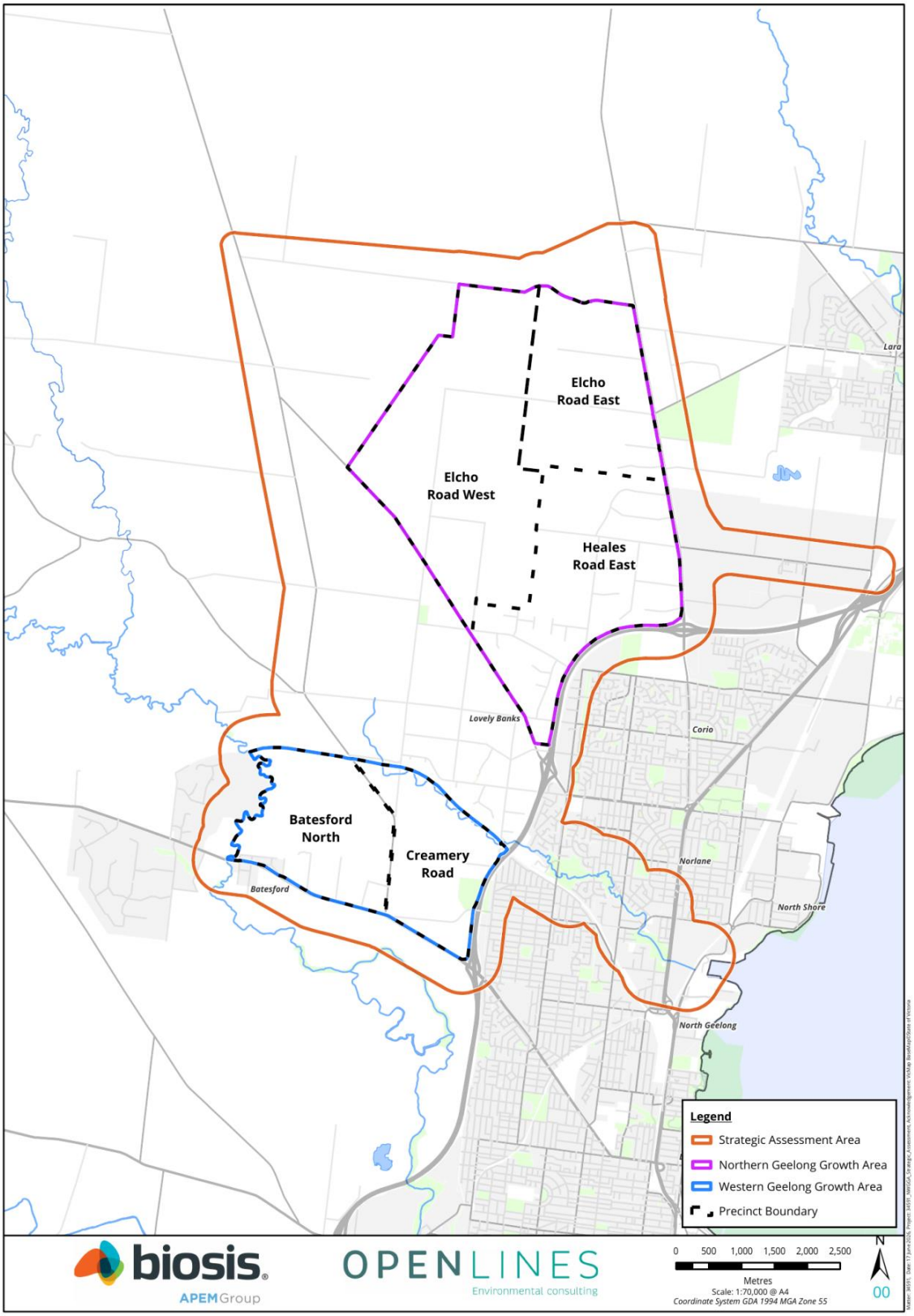


Figure 1-1: Area covered by the BCS

2 Biodiversity outcomes and guiding principles

2.1 BIODIVERSITY OUTCOMES

This section describes the outcomes that will be provided for the biodiversity values within the Growth Areas. It describes the outcomes framework that is used, and sets out the biodiversity outcomes for national, State and local values that will be achieved through implementation of the BCS.

2.1.1 OUTCOMES FRAMEWORK

The BCS applies an outcomes framework to clearly set out what will be achieved for biodiversity. The framework is based on program logic principles and aligns with the framework used in the EPBC Plan. It supports accountability and transparency by providing the basis and set of benchmarks for monitoring, reporting, and ongoing evaluation and adaptive management of the BCS.

The outcomes framework for the BCS is comprised of four components:

- A broad ***objective*** which identifies the contribution that the outcomes of the BCS will make to biodiversity
- ***Outcomes*** which are the positive impacts or changes to biodiversity values that are needed to achieve the overall objective of the BCS. The outcomes are set out in relation to:
  - National level biodiversity outcomes (these are taken from the EPBC Plan)
  - State and local biodiversity outcomes which are specific to the BCS
  - An implementation outcome for the BCS
- ***Commitments*** which are the direct results of implementing the measures that are expected to lead to the achievement of the outcomes. Some commitments are drawn from the EPBC Plan and others are specific to the BCS
- ***Measures*** which are the specific actions that will be undertaken to meet the commitments. Measures are not defined in the EPBC Plan. The BCS defines the full suite of the measures needed to implement the commitments at all levels

2.1.2 NUMBERING OF OUTCOMES, COMMITMENTS AND MEASURES

To provide clarity, different numbering systems are used to distinguish the national level versus State and local level outcomes, commitments and measures.

National level outcomes and commitments provided in the EPBC Plan and their associated measures are identified using cardinal numbers (e.g., 1, 2, 3 etc).

State and local outcomes, commitments provided in the BCS, and their associated measures are identified using Roman numerals (e.g., i, ii, iii etc).

2.1.3 OBJECTIVE

The objective of the BCS is to:

Provide genuine, long-term, positive outcomes for the national, State and local biodiversity values that are present within the Growth Areas

This objective is supported by outcomes, commitments and measures.

2.1.4 NATIONAL LEVEL BIODIVERSITY OUTCOMES

The national level outcomes for biodiversity are defined in the EPBC Plan and presented in Table 2-1 below.

Table 2-1: National level biodiversity outcomes (taken from the EPBC Plan)

No.	Outcome
1	Populations of Golden Sun Moth and Striped Legless Lizard are maintained within the Northern Conservation Area
2	The extent and condition of Natural Temperate Grassland is maintained within the Eastern Conservation Area
3	Impacts to habitat for Golden Sun Moth, Striped Legless Lizard and Natural Temperate Grassland within the gully avoidance area are avoided and minimised
4	Potentially suitable habitat attributes for Victorian Grassland Earless Dragon within the Northern Conservation Area are protected and managed to support potential recovery of the species
5	Actions that support the long-term viability and recovery of the Victorian Grassland Earless Dragon are funded by the Victorian Grassland Earless Dragon Trust Fund, and are implemented
6	The long-term viability of the important population of the Growling Grass Frog along Cowies Creek is supported through the protection and enhancement of habitat
7	The establishment of offset sites outside the Growth Areas leads to the protection and management of known habitat for Natural Temperate Grassland, Golden Sun Moth and Striped Legless Lizard
8	Matters of national environmental significance associated with the Moorabool avoidance area, as well as other waterways, riparian areas and wetlands are protected from any adverse impacts of development under the Plan

2.1.5 STATE AND LOCAL LEVEL BIODIVERSITY OUTCOMES

The State and local level biodiversity outcomes that will be achieved through implementation of the BCS are set out in Table 2-2. These outcomes recognise that the national level outcomes will also provide a range of benefits to State and local values and seek to minimise duplication by focusing on the additional positive impacts or changes to biodiversity values that are needed at the State and local level.

Table 2-2: State and local level biodiversity outcomes

No.	Outcome
i	Strategic conservation areas within the Growth Areas are protected and managed to provide for the long-term protection of biodiversity values
ii	Precinct design and delivery enhances biodiversity and connectivity within the Growth Areas
iii	Biodiversity offsets for impacts to State values are calculated at the precinct scale and provided as development proceeds

2.1.6 IMPLEMENTATION OUTCOME

The implementation outcome for the BCS is set out in Table 2-3.

Table 2-3: Implementation outcome

No.	Outcome
iv	Implementation of the BCS is effective, timely, and cost efficient

2.1.7 COMMITMENTS AND MEASURES

The commitments and measures to deliver the outcomes are discussed throughout Section 4 and provided in full in the Commitments and Measures document.

2.2 GUIDING PRINCIPLES

A set of principles were developed to help guide both the preparation of the BCS and the decisions that will need to be made as part of the strategy's implementation. The principles considered the work undertaken for the Melbourne Strategic Assessment's BCS (DEPI, 2013) and are consistent with, and support the:

- Goals, principles and directions of the City's Environment Strategy (The City of Greater Geelong, 2020) for protecting and enhancing the region's biodiversity
- Objectives and actions of the Framework Plan (The City of Greater Geelong, 2021) for protecting biodiversity and waterways within the Growth Areas

The guiding principles of the BCS are focused on providing genuine, long-term, positive outcomes for the national, State and local biodiversity values that are present within the Growth Areas.

The principles are set out below under the following categories:

- Consultation and engagement
- Decision-making
- Mitigation hierarchy
- Conservation planning
- Implementation

2.2.1 CONSULTATION AND ENGAGEMENT

- Consult with the community during preparation and implementation of the BCS
- Collaborate with the Wadawurrung Traditional Owners and use traditional knowledge of country to improve biodiversity planning and management practices
- Increase community understanding and involvement in biodiversity conservation activities

2.2.2 DECISION-MAKING

- Consider the protection and enhancement of biodiversity in advance of PSP preparation and at a strategic level to improve biodiversity outcomes and address cumulative impacts of urban development within the Growth Areas
- Use the best available ecological information to make decisions. This includes information from detailed ecological surveys, historical species records, native vegetation and species habitat modelling, and expert advice
- Ensure decisions around protecting and enhancing biodiversity are focused on achieving genuine, long-term biodiversity benefits. This includes the application of conservation planning principles (see Section 2.2.4)
- Consider relevant biodiversity policy guidelines and plans, including actions statements under the *Flora and Fauna Guarantee Act 1988* (FFG Act) and conservation advices and recovery plans under the EPBC Act

2.2.3 MITIGATION HIERARCHY

In accordance with both Commonwealth and State biodiversity laws, mitigate impacts on biodiversity through a hierarchy of:

- First – avoid impacts
- Second – minimise impacts
- Third – offset where residual adverse impacts are unavoidable

2.2.4 CONSERVATION PLANNING

STRATEGIC CONSERVATION AREAS

Identify strategic conservation areas within the Growth Areas by prioritising areas that achieve one or more of the following criteria:

- Support remnant biodiversity patches larger than 10 hectares
- Provide connectivity across the landscape. For example, waterways and larger connected patches of vegetation
- Are considered likely to be viable in the long-term. For example, this includes areas that:
  - Are in better condition and trend
  - Have the potential to be restored for ecological benefit
  - Have the potential to be managed effectively
- Support threatened ecological communities and/or habitat for threatened species
- Support multiple biodiversity values

AVOIDANCE AREAS

Identify areas within the Growth Areas that support Commonwealth, State and local biodiversity values, which may not be appropriate for formal protection and management (as an offset) under the EPBC Plan, but could be reasonably avoided while still achieving development outcomes.

LANDSCAPE CONNECTIONS

Identify opportunities for biodiversity sensitive urban design in the Growth Areas through:

- Integrating biodiversity and biodiversity connectivity into urban landscapes and infrastructure design through the preparation of the PSP and detailed landscape design
- Restoring biodiversity to local parks, roadsides, open space reserves, waterways, escarpments, linear trails and streetscapes using Ecological Vegetation Classes (EVCs), natural regeneration techniques and indigenous plants of local provenance
- Restoring habitat into urban landscapes through the establishment of indigenous tree, shrub and understory plantings and other habitat elements such as wetlands, logs, rocks and stags
- Restoring degraded waterways and wetlands to create habitat and ecologically healthy water flows
- Minimise breaks and barriers in landscape connections through the detailed design at precinct planning

STRATEGIC OFFSETS

Where offsets are needed, apply a strategic approach to maximise opportunities for:

- Implementation of a funding program that facilitates sustainable funding for the strategic delivery of commonwealth offsets
- The early delivery of a significant proportion of the offset liability
- Securing and managing areas of land that meet at least one of the following strategic landscape criteria:
  - Protection of larger land parcels compared to typical project-by-project offsets
  - Located within a key biodiversity corridor and improves connectivity across the landscape
  - Connected to an existing conservation reserve (within or external to the Growth Areas)

2.2.5 IMPLEMENTATION

Design the BCS to ensure that it will be successfully implemented. This includes consideration of the:

- Administrative efficiency and complexity of the BCS
- Funding arrangements for implementation
- Governance arrangements for implementation
- Risks around the delivery of offsets over the life of the BCS

3 Biodiversity values and threats

This section describes the biodiversity values and the threats to those values within the Growth Areas. It provides:

- Discussion of the landscape context within which the Growth Areas occur
- Description of the national, State and local biodiversity values within the Growth Areas
- An overview of the key threats to biodiversity within the Growth Areas

3.1 LANDSCAPE CONTEXT

3.1.1 BIOREGION

The Growth Areas sit within the Southern Volcanic Plain bioregion (Interim Biogeographic Regionalisation for Australia), otherwise described in Victoria as the Victorian Volcanic Plain bioregion. The bioregion is characterised by broad basaltic plains, interspersed with areas of lakes and swamps. Native grasslands occur in areas where basalts are older and more weathered to produce heavy clays which are generally fertile yet poorly drained. Younger occurrences of relatively unweathered lava flows occur as stony rises, and support thin soils and woodland vegetation (Dahlhaus *et al.*, 2003; Williams, 2022).

3.1.2 GEOLOGY AND SOIL

The bioregion was created by volcanic activity which occurred between approximately 4.5 million to 10,000 years ago. Volcanic activity was mostly from many small volcanoes which created lava flows of basalt, which filled in valleys and created broad plains. There are some occurrences of more explosive eruptions in the region which created circular craters which today contain lakes and swamps (Williams, 2022).

Today, the geology of the Growth Areas is dominated by areas of basalt, interspersed with areas of alluvial deposits (associated with the Moorabool River) and aeolian deposits (associated with Cowies Creek). The areas of basalt are characterised as plains with poorly developed drainage and with shallow bedrock. Aeolian deposits tend to be characterised as plains with unconsolidated sedimentary deposits, and areas of alluvium are described as unconsolidated sediment occurring as terraces, floodplains, and coastal plains (DELWP, 2022).

3.1.3 TOPOGRAPHY AND SURFACE HYDROLOGY

The topography of the NGGA is varied. A largely flat, elevated area occurs in the north-western and central areas of the Growth Area. Along the eastern section of the Growth Area, an escarpment occurs, with the landscape falling steeply towards the east, draining into the Hovells Creek catchment, upstream of Limeburners Bay. In the south-west of the Growth Area, the land slopes downwards towards the south-west, draining into the Cowies Creek catchment.

The topography of the WGGA is also varied. The central area of the WGGA is largely flat. The north-eastern corner of the Growth Area slopes towards the north-east, draining into the Cowies Creek catchment. The western section of the Growth Area is steep and drains westwards, into the catchment of the Moorabool River. A small section of the south-eastern corner of the Growth Area slopes gently towards the south-east, also flowing into the catchment of the Moorabool River.

There are three catchments which the Growth Areas are hydrologically linked to via overland flow (see Figure 3-1):

- Moorabool River catchment, which occurs to the south of the Growth Areas. The Moorabool River flows south, joining the Barwon River at Fyansford. The Barwon then continues to flow south, into the Lake Connewarre Complex, part of the Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar site. This wetland complex then drains into the ocean at Barwon Heads
- Hovells Creek catchment, which occurs to the east of the northern half of the Strategic Assessment Area. This catchment contains Limeburners Bay, part of the Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar site, and drains southward into Corio Bay
- Cowies Creek catchment, which occurs to the east of the central and southern half of the Strategic Assessment Area. This creek drains eastward into Corio Bay

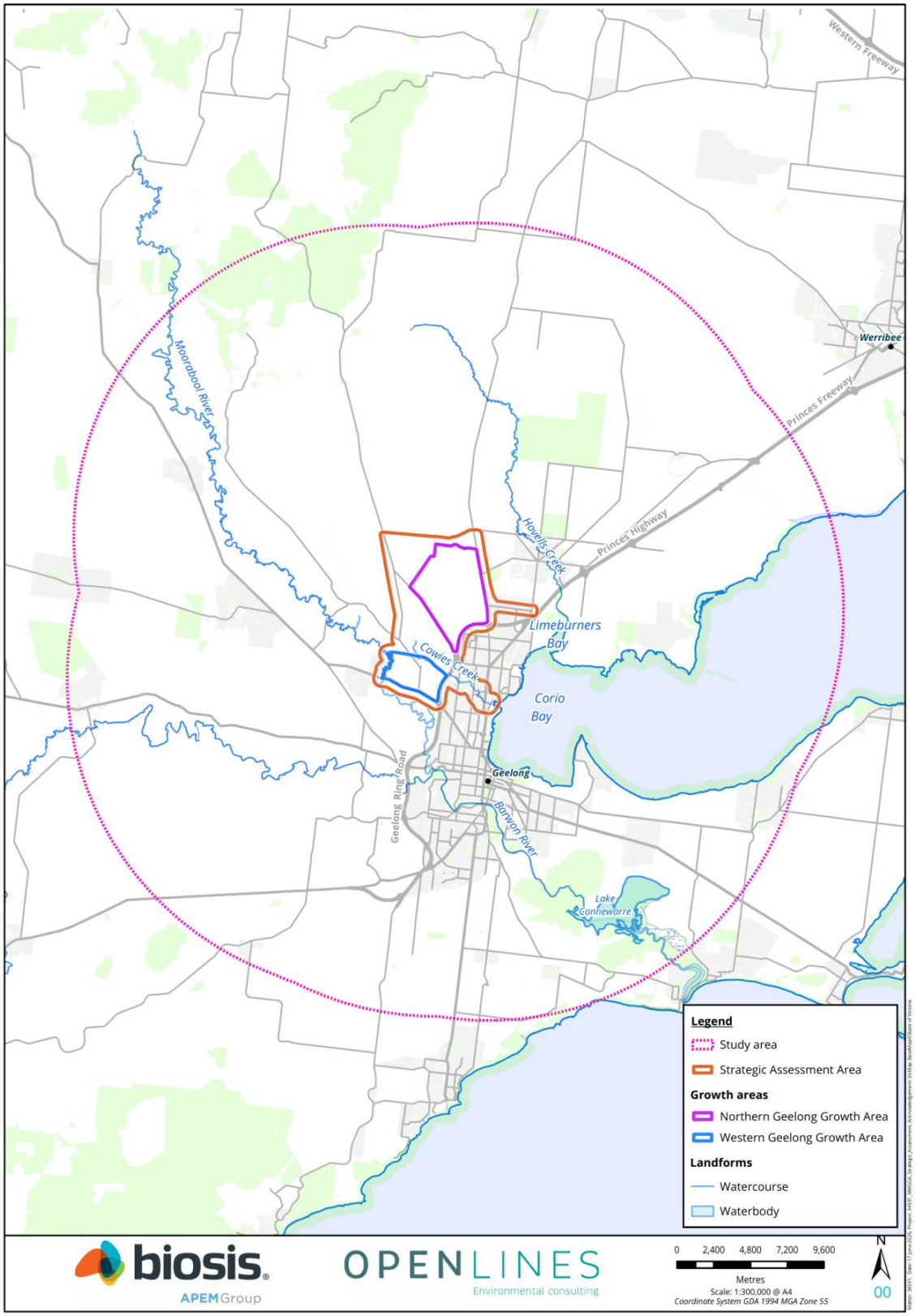


Figure 3-1: Key landforms

3.1.4 PAST AND CURRENT LAND USE

The traditional owners of the land are the Wadawurrung Aboriginal people, a recognised tribe consisting of 25 clans (family groups), which form part of the larger Kulin Nation of Aboriginal people. The Country known now as Geelong was occupied for at least 45,000 years by traditional owners prior to European Settlement (Rowe, 2021).

There are a number of registered Aboriginal places across the Growth Areas, comprised mostly of stone artefacts. There has been limited archaeological investigation within the Growth Areas, and the available data may not accurately reflect land use by the Wadawurrung people. Preliminary Aboriginal site sensitivity mapping has indicated areas of high archaeological potential along the waterways on the WGGA and one area in the NGGA near to a registered stone artefact (The City of Greater Geelong, 2021).

Today, the Growth Areas primarily include land which has been developed for agricultural purposes. The NGGA is largely open treeless pasture, primarily used for pastoral and cropping activities, in conjunction with rural residential housing. The WGGA includes a mix of existing land uses, including agriculture, recreation reserves, Council-managed reserves, rural and medium density housing, and educational facilities.

3.1.5 PARKS, RESERVES OR OTHER PROTECTED AREAS

Due to substantial agricultural land use and intensification, the bioregion has become one of the bioregions most depleted of native vegetation in Victoria. As of 2003, only 4.5 per cent of the bioregion still had a cover of native vegetation. Further, as of 2003, less than 1.2 per cent of the bioregion was in a formal conservation reserve (DSE, 2003).

There are minimal parks, reserves or other protected areas within the Growth Areas (see Figure 3-2), however a community use recreation area approximately 0.3 hectares in size is located along the Moorabool River just north of Midland Highway.

3.1.6 BIODIVERSITY CORRIDORS SURROUNDING THE GROWTH AREAS

Biodiversity corridors surrounding the Growth Areas are mostly concentrated along riparian corridors, with remnant grassland occurring in modified agricultural context much like within the Growth Areas.

Cowies Creek and the Moorabool and Barwon Rivers contain several ephemeral and minor tributaries which feed into wetland areas that support native flora and fauna habitat on private and public land with various grades of active conservation management.

Remnant indigenous vegetation and fauna in the Growth Areas are considered important to the biodiversity of the wider locality. Without appropriate management, losses resulting from direct and indirect degradation processes will inevitably mean the loss of most biodiversity. The protection and management or waterways within the Growth Areas will therefore play a significant role in the conservation of vital vegetation and habitat.

An important biodiversity linkage is formed by connections between the Moorabool River Reserve, Dog Rocks Sanctuary, the vegetated area south of Dog Rocks Sanctuary (known as Honey Woodland), Dog Rocks Reserve and Red Gum Reserve. This biodiversity linkage has been strengthened with additional planting along Dog Rocks to the south to improve fauna connections to the grasslands to the south.

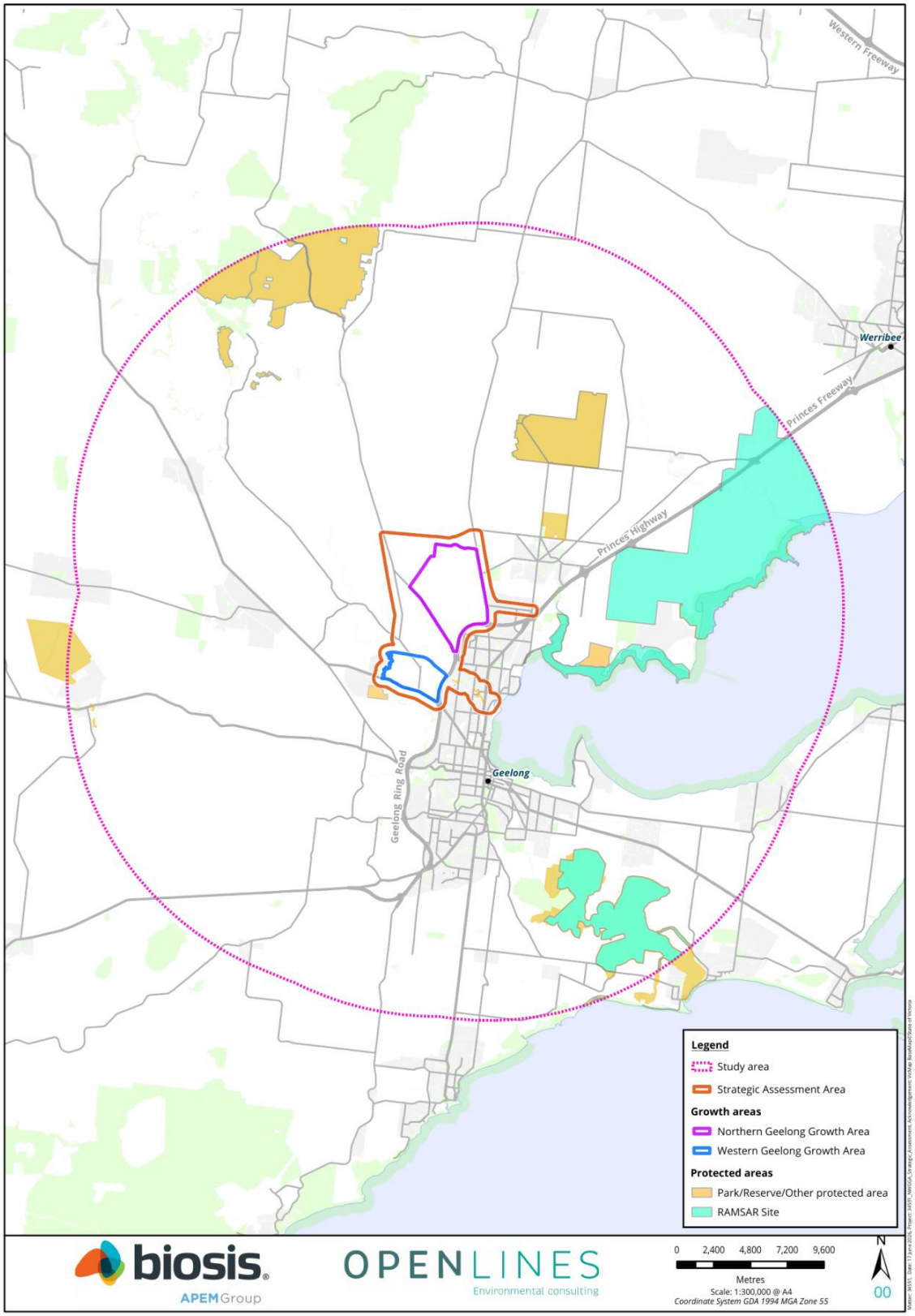


Figure 3-2: Protected areas

3.2 BIODIVERSITY VALUES WITHIN THE GROWTH AREAS

3.2.1 ASSESSMENT OF THE GROWTH AREAS

The biodiversity values of parts of the Growth Areas are documented within *Existing Ecological Conditions: Northern and Western Geelong Growth Areas*, July 2021, prepared by Ecology and Heritage Partners (EHP, 2021).

Between November 2019 and December 2020, over 200 person days were spent surveying native vegetation, ecological communities and significant flora and fauna species. Site assessments were restricted to parcels/properties where access was permitted. These areas are referred to as the 'surveyed areas'. This resulted in a total of approximately 33 per cent of the NGGA and 13 per cent of the WGGA (area subject to the EPBC Plan) not being subject to on-ground assessments, referred to as the 'unsurveyed areas'.

In January 2022, the City provided an opportunity for those with land included within the EHP 2021 assessment area to supply further information for consideration in the development of the Part 10 Strategic Assessment. The intention was for additional information to be submitted for consideration where landholders had concerns with mapping anomalies and/or assumptions. The City assessed submissions against set evaluation criteria, which led to minor changes to the EHP 2021 dataset.

In early 2023, the Victorian Grassland Earless Dragon (*Tympanocryptis pinguicolla*) (VGED) was rediscovered west of Melbourne (outside of the Growth Areas). Much of the City of Greater Geelong LGA is identified as being within the species potential habitat. In late-2023, the City engaged Biosis to undertake habitat assessments and targeted surveys (Biosis, 2024) involving the following three key steps:

- Initial habitat assessment to determine investigation areas for VGED within the Growth Areas and to exclude clearly unsuitable habitat
- Targeted surveys within areas of potentially suitable habitat (i.e. the investigation areas) to search for individuals of the species
- Habitat suitability assessments within areas of potentially suitable habitat to identify and map habitat attributes for the species

3.2.2 OVERVIEW

The condition of the environment within the Growth Areas varies. Most of the area is highly modified due to agricultural land use and is largely dominated by non-native species. Native vegetation and terrestrial fauna habitat are limited to areas which have not been historically subject to cropping, and to riparian corridors. Where native vegetation is present, much of it is highly modified with a low diversity of native species and lacking in suitable vegetation structure (EHP, 2021).

The existing level of disturbance within the Growth Areas is consistent with the broader landscape trend within the bioregion, where the vast majority of the bioregion has been developed for agriculture (DSE, 2003).

Despite this, the Growth Areas support a range of biodiversity values in areas which have been subject to reduced levels of historical disturbance. These values are documented below and are discussed in relation to the following attributes:

- Native vegetation
- Flora
- Fauna
- Waterways and wetlands

3.2.3 NATIVE VEGETATION

ECOLOGICAL VEGETATION CLASSES

Three Ecological Vegetation Classes (EVCs) have been either recorded in the surveyed areas or are modelled to occur in the unsurveyed areas of the Growth Areas. These include:

- Low Rainfall Plains Grassland (EVC_132_63)
    - Contiguous patches within the northern portion of the NGGA. Scattered patches throughout the remaining balance of the NGGA, particularly along the eastern and southern portion of the Growth Area

- Scattered patches throughout the WGGA, with some larger patches concentrated in the east, west and southern portions
- Creekline Grassy Woodland (EVC 68) along Cowies Creek frontage on the northern boundary of the WGGA
- Floodplain Riparian Woodland (EVC 56) along the Moorabool River frontage across the western extent of the WGGA

Figure 3-3 and Figure 3-4 show the mapped EVCs in the surveyed areas as well as DELWP (2005) modelled mapping within the unsurveyed locations of the Growth Areas.

A summary of the total area of EVCs present within the Growth Areas is provided in Table 3-1.

EVCs that were assessed and mapped across the Growth Areas are broadly consistent with extant DELWP (2005) modelled mapping that shows both Growth Areas to contain discrete areas of Plains Grassland (EVC 132), with areas adjacent to the Moorabool River modelled as Floodplain Riparian Woodland (EVC 56) (DELWP, 2005; EHP, 2021).

Higher quality patches of Plains Grassland within the NGGA meet the condition thresholds to be considered Natural Temperate Grassland; while several patches have been classified as the State significant Western (Basalt) Plains Grassland vegetation community (WBPG) (EHP, 2021).

Since the time of the EHP site assessments, subsequent assessments have been undertaken by Biosis which have confirmed that the extent of Plains Grassland (EVC 132) has deteriorated significantly. Successive years of relatively high rainfall has promoted significant grass growth and has been particularly advantageous to high threat perennial grassy weeds such as Toowoomba Canary-grass (*Phalaris aquatica*) and particularly Chilean Needle-grass (*Nassella neesiana*). While subsequent dry years may result in a decline in Toowoomba Canary-grass, without intensive active management the conversion of Plains Grassland to a dominance of Chilean Needle-grass is likely to be permanent.

Commonly observed native flora species recorded in grassland habitats included Short Wallaby-grass (*Rytidosperma carphoides*), Striped Wallaby-grass (*Rytidosperma racemosum var. racemosum*) and Veined Spear-grass (*Austrostipa rudis subsp. rudis.*) River Red-gum (*Eucalyptus camaldulensis*) was the dominant tree species within the WGGA, however several non-indigenous planted eucalypt species also occur throughout the Growth Areas, particularly around dwellings and/or farm sheds/maintenance areas.

Table 3-1: Total area of EVCs present within the Growth Areas

Ecological Vegetation Class	Biodiversity Conservation Status	NGGA surveyed areas (hectares)	NGGA unsurveyed areas (hectares)	WGGA surveyed areas (hectares)	WGGA unsurveyed areas (hectares)
Plains Grassland (EVC 132)	Endangered	146 ha	*111.959 ha**	41.479 ha	*29.399 ha**
Creekline Grassy Woodland (EVC 68)	Endangered	-	-	4.859 ha	-
Floodplain Riparian Woodland (EVC 56)	Endangered	-	-	23.107 ha	*2.252 ha**

* DELWP EVC mapping (DELWP, 2005)

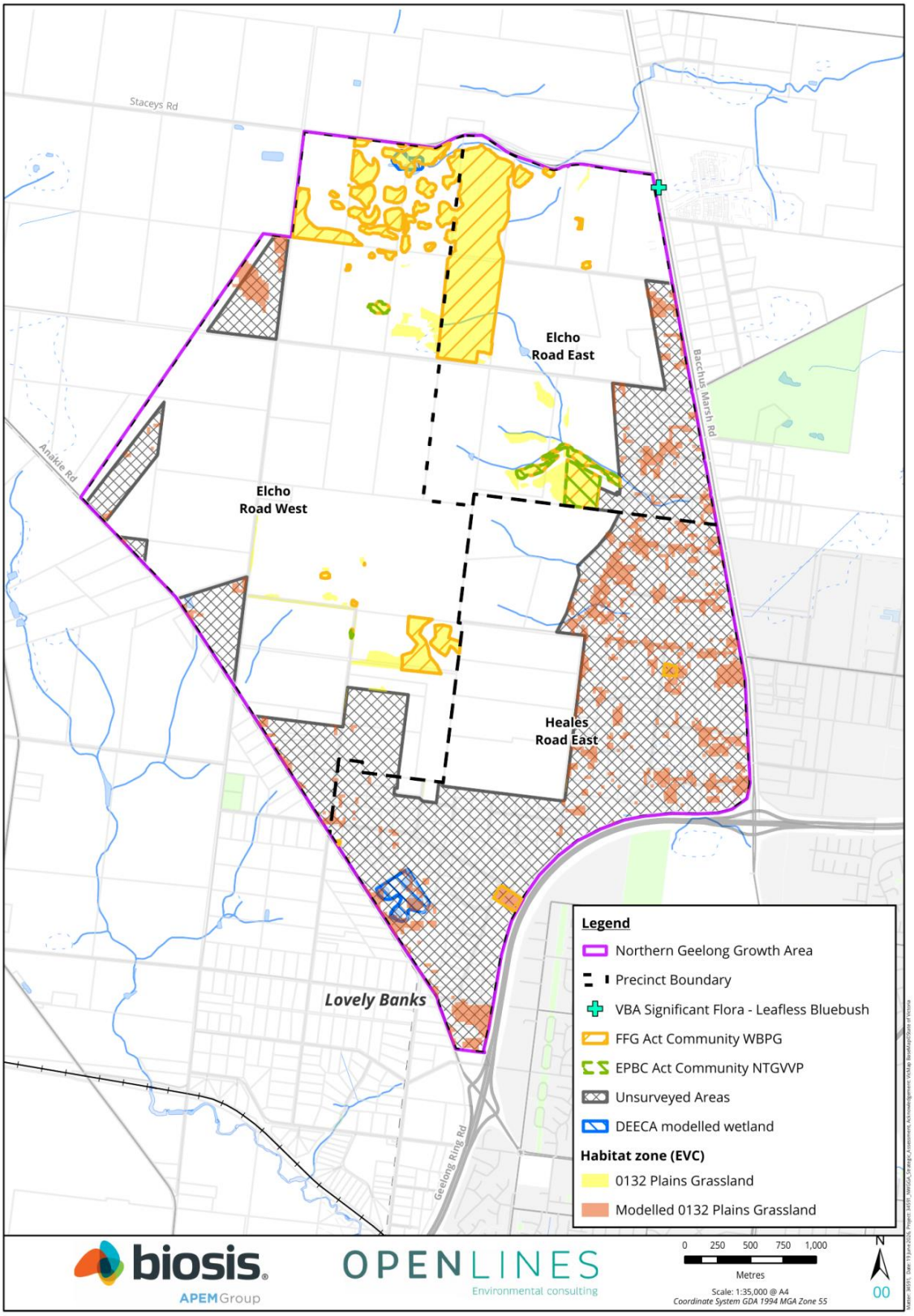


Figure 3-3: Native vegetation, TECs, and threatened flora in the NGGA

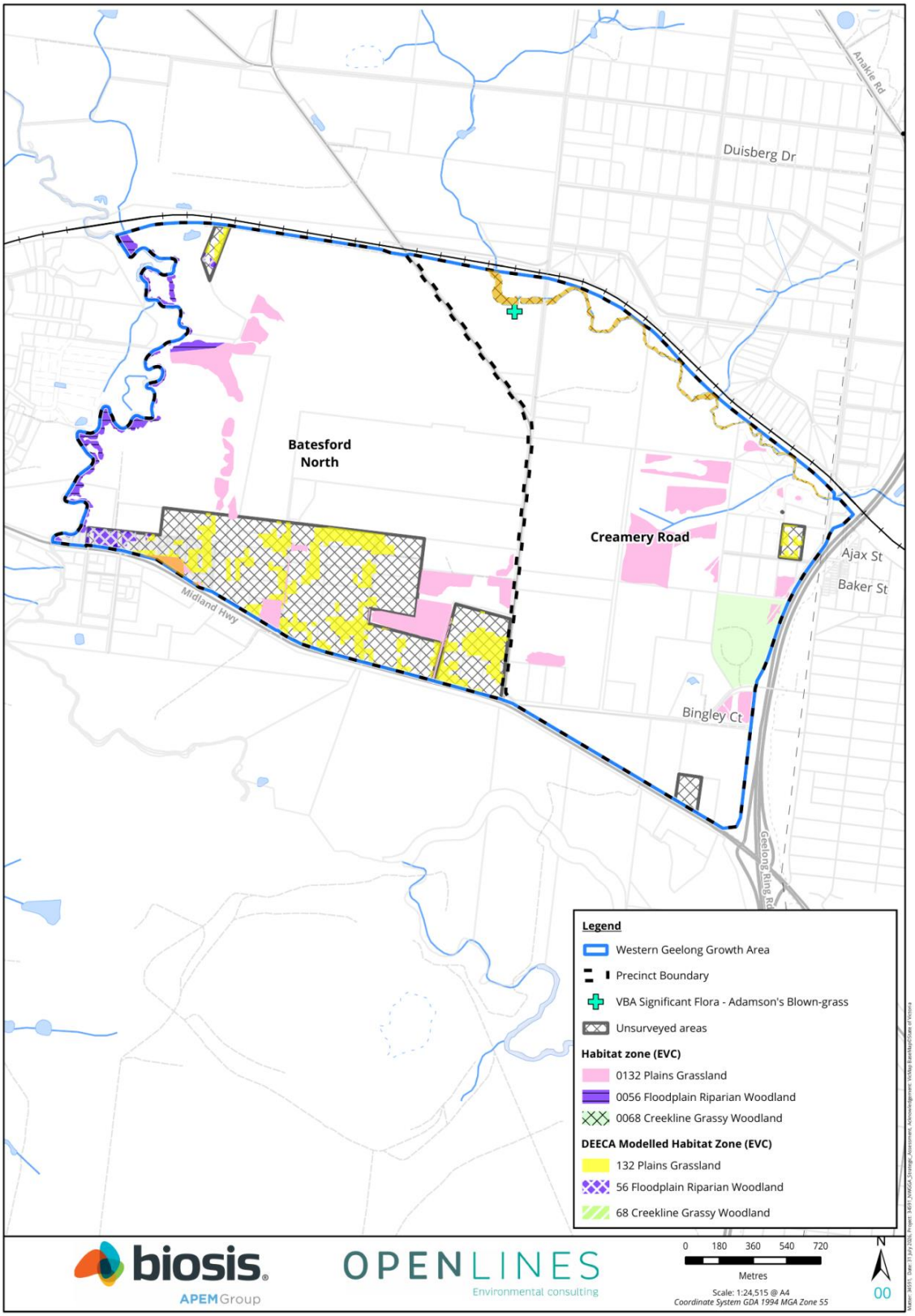


Figure 3-4: Native vegetation and threatened flora in the WGGA

THREATENED ECOLOGICAL COMMUNITIES

The following threatened ecological communities have been identified within the surveyed areas of the NGGA:

- 12.7 ha of the nationally listed ecological community Natural Temperate Grassland
- 123.8 ha of the FFG Act listed ecological community WBPG

No threatened ecological communities (either nationally listed or State listed) have been identified within the surveyed areas of the WGGA.

Natural Temperate Grassland within the NGGA occurs in a heavily modified form. This is reflected in its Site Condition Habitat Score (a score out of 75) which, when standardised, amounts to totals of either 16 or 24 out of 75 with an understorey score of 5/25. The later reflect the presence of less than 50 per cent of the expected number of lifeforms in this community while still supporting more than a 50 per cent cover of native perennial tussock-grasses.

Examples of Natural Temperate Grassland within the NGGA also typically have a weed cover of greater than 25 per cent of the vegetation present, with high threat weeds such as Chilean Needle-grass being relatively common. Areas of Natural Temperate Grassland with a relatively extensive cover of high threat, perennial, grassy weeds have relatively low resilience to ongoing weed invasion. This makes Natural Temperate Grassland within the NGGA highly vulnerable to an ongoing rapid decline in condition, to the extent where the community can be expected to fail the required condition criteria to be defined as the TEC within relatively short timeframes (less than a decade).

There is potential for additional native vegetation and TECs to occur within the unsurveyed areas of the NGGA and WGGA.

Figure 3-3 and Figure 3-4 show native vegetation and ecological communities within the Growth Areas.

3.2.4 FLORA

Between November 2019 and August 2020, targeted surveys for six nationally listed threatened flora species were undertaken within the surveyed areas of Growth Areas, including: Adamson's Blown-grass (*Lachnagrostis adamsonii*), Matted Flax-lily (*Dianella amoena*), Clover Glycine (*Glycine latrobeana*), Button Wrinklewort (*Rutidosis leptorrhynchoides*), Large-headed Fireweed *(Senecio macrocarpus*) and Spiny Rice-flower (*Pimelea spinescens* subsp. *spinescens*).

No nationally listed threatened flora species were recorded within the surveyed areas, although Adamson's Blown-grass has been assumed to be present along the Cowies Creek corridor within the WGGA (see Figure 3-4) based on relatively recent historical records, and the presence of suitable habitat (EHP, 2021). One State significant flora species, Leafless Bluebush (*Maireana aphylla*) was recorded at the north-eastern boundary of the NGGA (see Figure 3-3).

It is considered highly unlikely that any additional threatened national or State flora species occur within the surveyed areas of the Strategic Assessment Area due to the ongoing land use of the site resulting in the absence of suitable habitat, and the highly modified condition of the understory (EHP, 2021) (see Part 4 of the SAR).

3.2.5 FAUNA

Between December 2019 and December 2020, targeted surveys for five nationally listed threatened fauna species were undertaken within the surveyed areas of Growth Areas, including: Golden Sun Moth *Synemon plana* (GSM), Striped Legless Lizard (*Delma impar*) (SLL), Growling Grass Frog (*Ranoidea* raniformis) (GGF), Australian Grayling (*Prototroctes maraena*) and Little Galaxias (*Galaxiella toourtkoourt*).

Targeted surveys recorded SLL and GSM within the NGGA, and GGF along Cowies Creek within the WGGA.

Targeted surveys for the Australian Grayling and Little Galaxias within the WGGA did not identify the species. However, the Australian Grayling is considered likely to be present within the broader catchment area. It is noted that the Corangamite CMA has proposed to remove barriers within the Moorabool River which currently prevent fish accessing habitat further upstream adjacent to the WGGA. Future planning for the WGGA PSPs should assume the presence of the GGF, Australian Grayling and Little Galaxias following the removal of these barriers (EHP, 2021).

Between September 2023 and May 2024, detailed habitat assessments and targeted surveys for VGED were undertaken in areas identified as containing potential VGED habitat during the initial habitat assessment. Targeted VGED surveys focused on sections of grassland with the greatest likelihood of containing a remnant population, based on the visual quality and availability of habitat attributes. No VGED were recorded.

In February 2026, the Glossy Grass Skink (*Pseudemoia rawlinsoni*) (GGS) was listed as a vulnerable species under the EPBC Act. Given the timing of the listing no surveys were undertaken for the species. However, potential habitat mapping has been created for the species.

A single State significant fauna species Hardhead (*Aythya australis*) was incidentally observed within the NGGA during EHP surveys, although it is considered unlikely that the species would maintain a resident population within the Growth Areas. The Eastern Great Egret (*Ardea alba modesta*) and Black Falcon (*Falco subniger*) have recently been recorded in close proximity to the Growth Areas, and it is likely that these species would use to the Growth Areas for opportunistic forage, or as a steppingstone throughout the broader landscape. An active Platypus (*Ornithorhynchus anatinus*) burrow was observed within the Moorabool River.

More recent surveys in 2024 for VGED recorded several small vertebrate species listed under the FFG Act, including the Tussock Skink (*Pseudemoia pagenstecheri*) and Fat-tailed Dunnart (*Sminthopsis crassicaudata*).

Striped Legless Lizard

Targeted surveys for SLL recorded 45 individuals within the NGGA under ten different tile grids.

Based on the location of the confirmed records of the species and quality and extent of habitat, 103.7 ha of confirmed SLL habitat is mapped within the NGGA. Sites where the species was recorded generally represent the most suitable areas of habitat for SLL within the NGGA. These areas supported a high cover of surface rock, cracking soils and tussock-forming grasses providing inter-tussock space. The high cover of surface rock at these sites also precludes regular slashing, which maintains a high biomass and dense tussock structure throughout the year.

An additional 76.3 ha of suitable habitat is also mapped within the NGGA. Although the species was not recorded in these areas, this habitat is considered suitable for the species due to it comprising predominantly native grassland with cracking soils and surface rock.

Despite targeted surveys being undertaken between September and December at a time when SLL was known to be present in the NGGA, no SLL were recorded in the WGGA. EHP 2021 found that the removal of native vegetation, high levels of grazing, pasture improvement and cultivation across the WGGA has contributed to the decline of high quality habitat for the species. They concluded that it is highly unlikely that a population of SLL is present within the Creamery Road and Batesford North precincts of the WGGA.

Approximately 47 ha of potential habitat for SLL is modelled to occur within the unsurveyed areas of the NGGA.

The following threats to SLL are potentially relevant to implementation of the EPBC Plan and BCS:

- Direct habitat removal
- Habitat degradation from rock collection or destruction
- Spread of weeds
- Predation by cats
- Inappropriate fire regimes

Figure 3-5 shows SLL habitat and records within the Growth Areas.

Golden Sun Moth

Targeted surveys within the Growth Areas recorded GSM within the NGGA. The species was not detected within the WGGA. The results of the targeted surveys have informed baseline habitat mapping for GSM.

The species Conservation Advice notes the importance of native habitat compared to non-native habitat and identifies high quality habitat as *"medium to large sites containing native grassland with an abundant component of larval food species (i.e., Rytidosperma spp. and/or Austrostipa spp.) with low weed cover, inter-tussock spaces, and land-use/management that is consistent with the ecological values of the site"* (DAWE, 2021).

The EHP surveys found the Growth Areas to be dominated by non-indigenous grasses and weeds (i.e., pasture grasses), which reflects the region's long history of agricultural use. Much of the indigenous vegetation and terrestrial fauna habitat remaining within the Growth Areas was found confined to riparian corridors in the WGGA (i.e., Moorabool River, Cowies Creek), or agricultural areas not subjected to historical cropping. Native vegetation, where present, was highly modified, generally lacking structure and exhibiting a low diversity of native species.

Subsequent site visits as part of the strategic assessment process, as well as the results of landholder commissioned surveys, have confirmed these findings and shown an increased prevalence of weeds since the time of the EHP surveys in 2019 and 2020. This indicates a declining trend in the condition of native vegetation (Peter Wlodarczyk pers comms.).

Despite the abundance of GSM records within the NGGA, it is unlikely the NGGA would qualify as an important or high-quality area due to the level of weeds, land modification, and rate of decline. To distinguish between native vs non-native habitat for the assessment of impacts to GSM and to reflect this declining trend in condition, habitat within the surveyed areas of the Growth Areas has been mapped according to categories. GSM habitat within the assessed areas therefore comprises:

- 21.1 ha of higher potential native habitat, which identifies the habitat areas with the greatest likelihood of supporting native vegetation based on the result of EHP surveys and the more recent landholder surveys
- 65.5 ha of moderate potential native habitat, which identifies the habitat areas with the potential to still support native vegetation identified through the EHP surveys, but recognising the declining trend in condition observed elsewhere in the Growth Areas and lack of more recent surveys for these areas
- 44.4 ha of lower potential native habitat, which identifies the habitat areas which have likely declined since the time of EHP surveys and are no longer expected to support native vegetation, based on the results of more recent landholder surveys
- 545.1 ha of non-native habitat, which identifies areas of GSM habitat which do not support native vegetation

Approximately 90 ha of GSM habitat is modelled to occur within the unsurveyed areas of the NGGA.

The following threats to GSM are potentially relevant to implementation of the EPBC Plan and BCS:

- Predation by cats
- Inappropriate fire regimes
- Direct habitat removal

Figure 3-6 shows records and habitat for GSM within the Growth Areas, and Figure 3-7 shows the habitat categories that have been mapped for the species.

Growling Grass Frog

Targeted surveys along Cowies Creek in the WGGA recorded approximately 50 GGF individuals across four sites. EHP 2021 considered that the area supported an important population (particularly because it contained a range of key habitat attributes) and that Cowies Creek was an important habitat corridor through the growth area. In the WGGA, Cowies Creek provides high quality habitat comprising in-stream aquatic areas and suitable terrestrial habitat for foraging and movement within 50 m of breeding habitat. Beyond this, areas of moderate and low quality habitat exist, much of which is currently degraded.

GGF has also been recorded downstream of the WGGA within Cowies Creek on several occasions. These records appear to have some level of connectivity with the frogs in the WGGA and are likely to form part of a larger, connected metapopulation.

The number and location of GGF records within Cowies Creek suggests that the corridor supports an important, connected metapopulation of the species. Records stretch for more than 3.5 km along the creek and suitable habitat extends beyond this distance.

The available information suggests that the Cowies Creek metapopulation is comprised of a range of discrete, breeding populations of GGF that are connected along the creek corridor. Despite previous development in the area the species is persisting and metapopulation dynamics are still operating.

There are no records of the species upstream from the WGGA and that area appears to have much more limited GGF habitat values due to historic land use. It is considered less likely that the species is present in this location on a permanent basis.

The following threats to GGF are potentially relevant to implementation of the EPBC Plan and BCS:

- Habitat degradation and/or modification caused by:
  - Changed hydrological regimes
  - Deterioration of water quality and any introduction of pollutants and biocides
- Fragmentation and isolation of populations
- Increases in artificial lighting
- Introduction of cats

Figure 3-8 shows GGF habitat and records within the Growth Areas.

Victorian Grassland Earless Dragon

Much of the Geelong region, including both Growth Areas, is identified as 'species or species habitat likely to occur' as per the Commonwealth's species distribution map.

Biosis undertook both targeted surveys and detailed habitat assessments between January and May of 2024 (Biosis, 2024). No VGED were recorded within the NWGGA during the targeted surveys.

The habitat suitability assessment was designed to complement the targeted surveys and understand the presence of a range of environmental factors which may be key habitat attributes for VGED. The purpose of this assessment was to provide data to help understand the potential value of areas of grassland within the NWGGA for VGED.

The data collected during the detailed habitat assessments was used to inform the VGED habitat attribute analysis (Biosis & Open Lines, 2024) which involved a range of analysis methods and scenarios to understand the potential value of the NWGGA for VGED. The focus of this analysis was on the NGGA. Although one property was accessed for detailed habitat assessments in the WGGA, it was considered unlikely to provide potential habitat value for VGED due to the level of weed cover and de-rocking on the site. In the NGGA, the habitat attribute analysis found that the general environmental condition and availability of habitat attributes for VGED varies. A large portion of the areas analysed exhibit high weed cover / low native vegetation cover, de-rocking, and land management practices which are likely to be unsuitable for VGED (particularly cropping and ploughing) (Biosis & Open Lines, 2024).

The analysis concluded that there are seven patches in the NGGA which are more likely to be of potential value for VGED (see Figure 3-9). These patches were consistently highlighted under different approaches to the analysis, and amount to 121.4 ha in total (Biosis & Open Lines, 2024). In addition, there is 91.0 ha of areas assumed to support potentially suitable habitat attributes which could not be accessed by Biosis.

The degraded condition of these areas, combined with the agricultural landscape of the Growth Areas and lack of contemporary or historical detection in the NWGGA, suggests that the NWGGA is unlikely to harbour a remnant population of VGED. However, the location of the NWGGA within the modelled distribution of the species, and presence of potentially suitable habitat attributes for VGED, mean that the Growth Areas could have a role in the potential recovery of the species.

Glossy Grass Skink

There are no confirmed records of GGS within the Strategic Assessment Area. However, it is noted that due to the recent listing of the species, no targeted surveys were conducted at the time baseline surveys were undertaken for the strategic assessment.

Potentially suitable habitat within the Growth Areas is limited to vegetated drainage lines, riparian margins along Cowies Creek and the Moorabool River, and Kikuyu grass swards along roadsides and fence lines in close proximity to wetlands or waterways that avoid mowing or grazing pressure.

Areas of medium quality potential habitat have been mapped along Cowies Creek west of the M1, where uncultivated grassland supports patches of dense exotic grass near water that may be used by the species year-round if a population is present. Low quality potential habitat occurs along ephemeral drains and riparian woodland fragments along the

Moorabool River, where lower vegetation density and fragmentation within a cultivated landscape reduces the likelihood of supporting the species.

Figure 3-10 shows habitat for GGS within the Growth Areas.

3.2.6 WATERWAYS

At a State and local level, the WGGA includes two significant waterways, the Moorabool River and Cowies Creek (see Figure 3-11).

Historically, the Moorabool River has been diverted twice from its natural alignment to facilitate limestone extraction at the Batesford quarry. Its current extent runs north-south along the WGGA's western boundary and continues to dissect the broader growth area south of Midland Highway in an east-west direction. The Moorabool River departs from the Growth Areas extent in the south-west at the Lewis Bandt Bridge in Herne Hill and flows for approximately 2.3 kilometres before joining the Barwon River.

Cowies Creek runs from the north-west to the south-east for 2.6 kilometres within the northern boundary of the WGGA. Cowies Creek originates from a series of wetlands in the Moorabool River north-west of the WGGA extent. Cowies Creek departs from the WGGA and enters Port Phillip Bay (Western Shoreline) 3.4 kilometres downstream.

The NGGA does not include any significant waterways.

3.2.7 WETLANDS

There are no Ramsar, or nationally significant wetlands mapped within the Growth Areas.

DEECA modelling indicates that the Growth Areas contains two wetland formations, as well as a number of dams used to support rural residences within the Growth Areas.

The NGGA contains two DEECA modelled wetland formations, totalling 10.38 ha. The first of these corresponds to a Barwon Water owned drinking water storage for the Geelong and District Water Supply System. The second of these appears to be related to two small farm dams (from aerial observations) located in the NGGA Conservation Area. This area was mapped as Plains Grassland (EVC 132) by EHP (2021a). Overland flows within the NGGA, including ephemeral drainage lines, discharge into Corio Bay, which includes part of the Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar site, complex of wetlands of international importance.

The WGGA does not contain any DEECA mapped wetland formations. The Moorabool River runs north to south along the western boundary of the WGGA and connects to the Barwon River approximately 7 km south. The system then flows into Lake Connewarre further downstream, part of the Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar site.

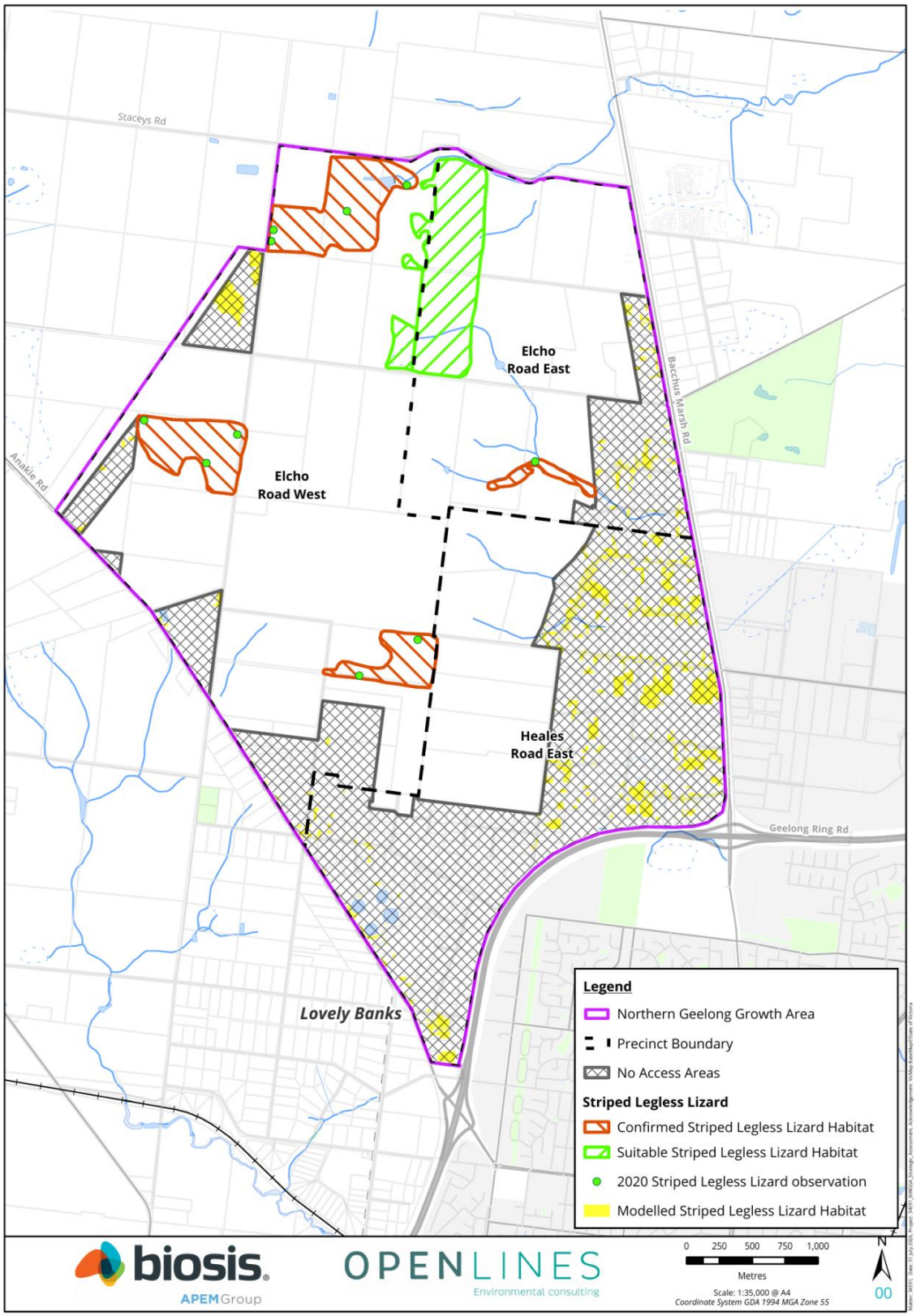


Figure 3-5: Striped Legless Lizard records and habitat in the NGGA

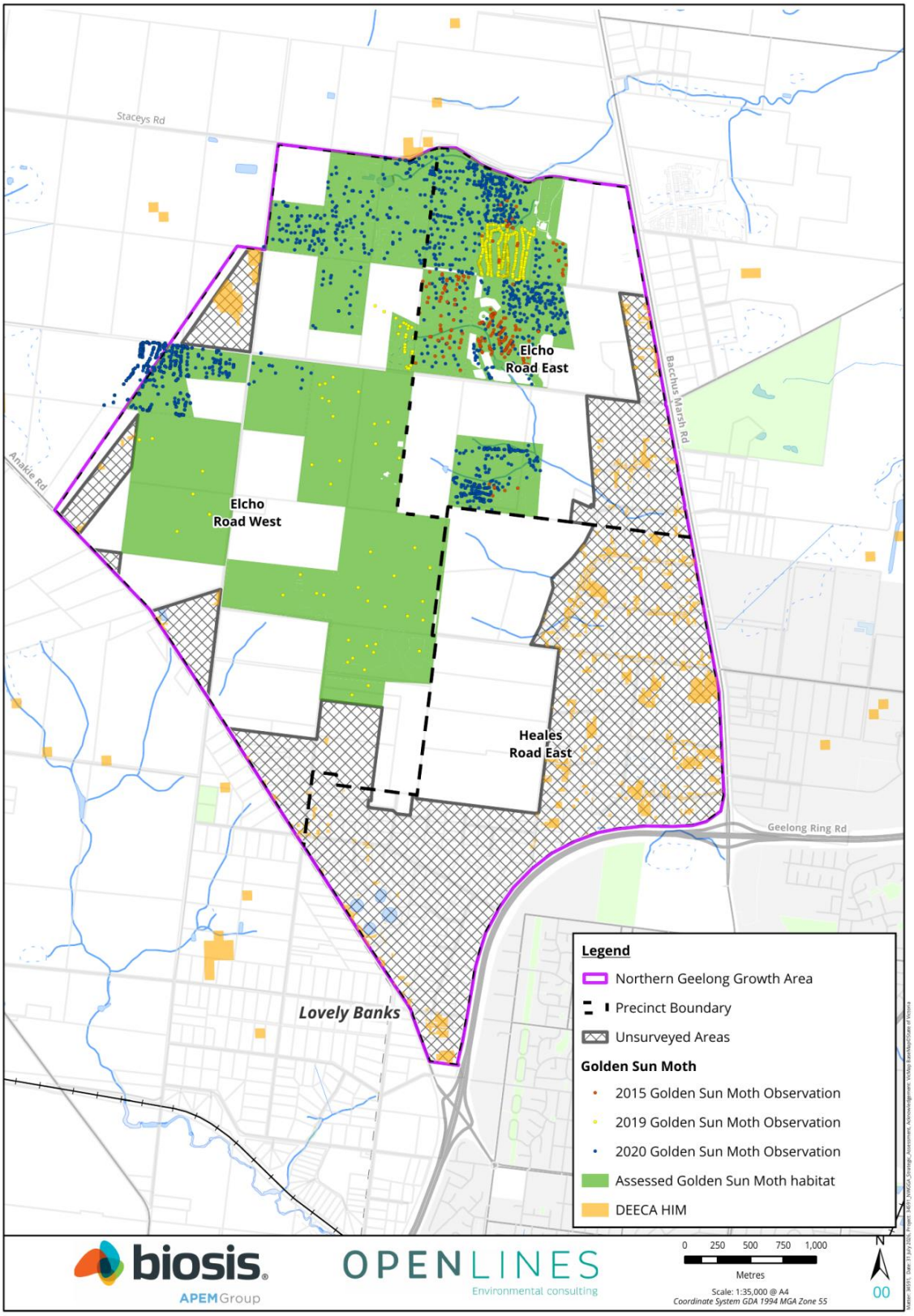


Figure 3-6: Golden Sun Moth records and habitat in the NGGA

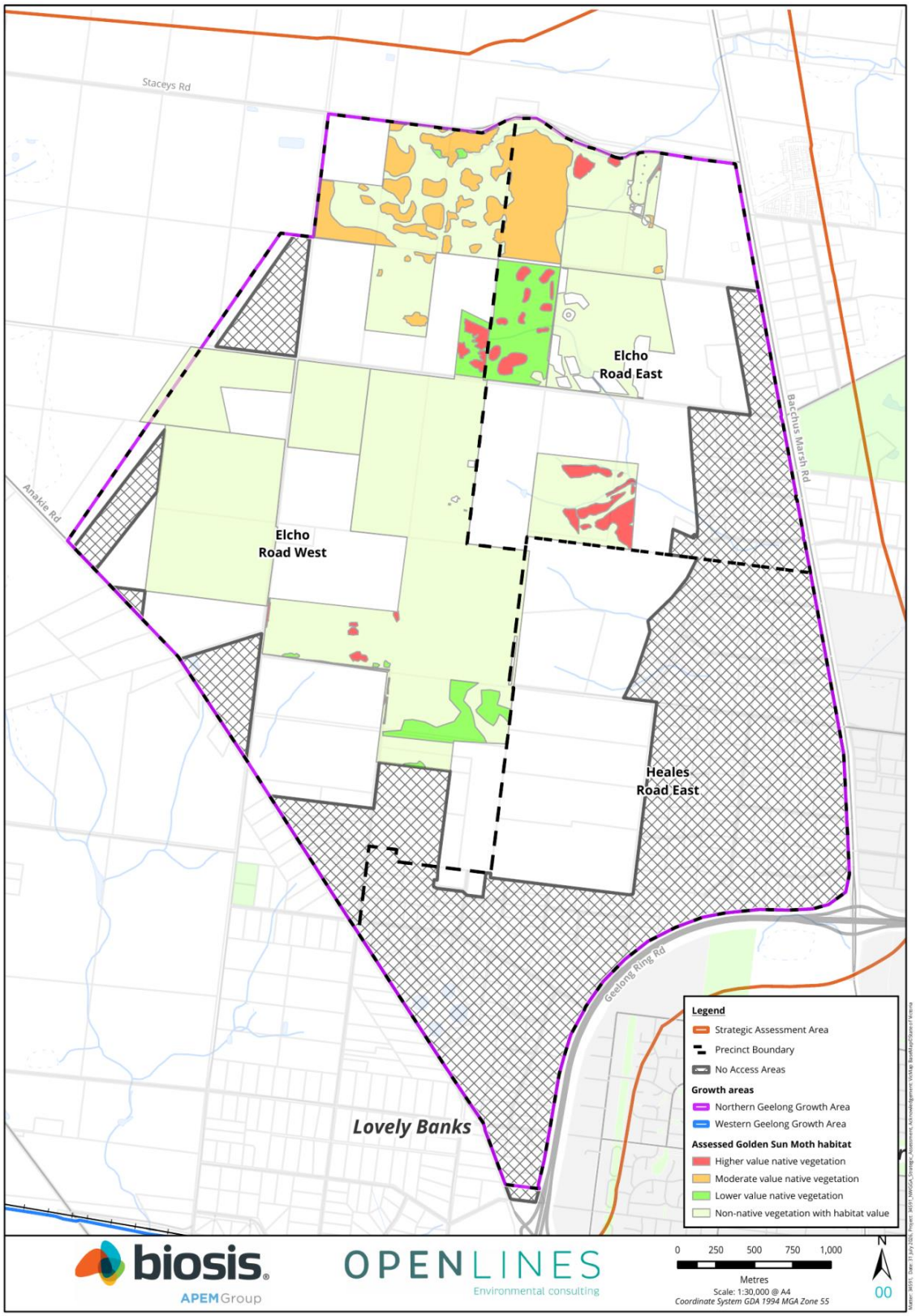


Figure 3-7: Golden Sun Moth habitat categories in the NGGA

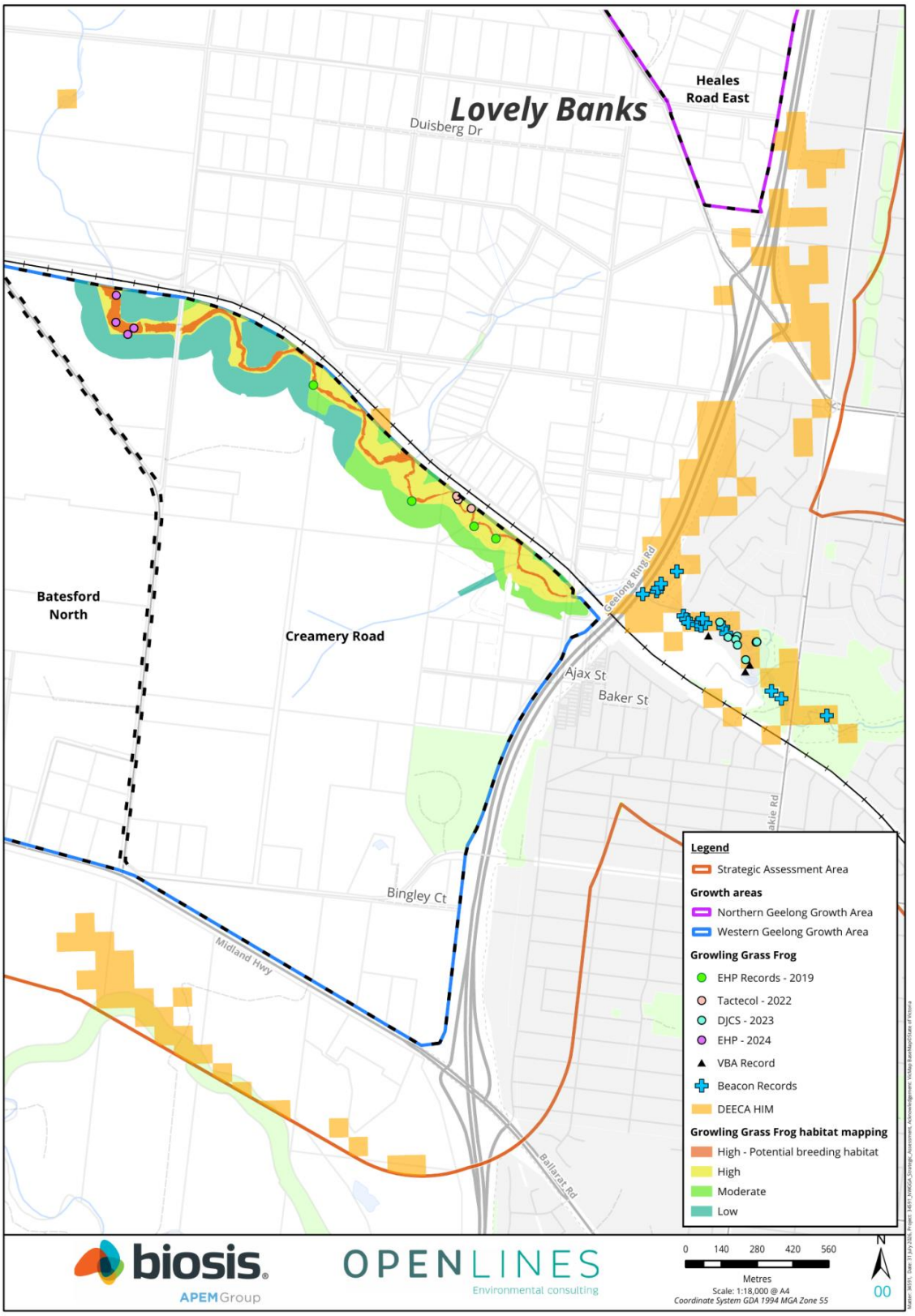


Figure 3-8: Growling Grass Frog records and habitat

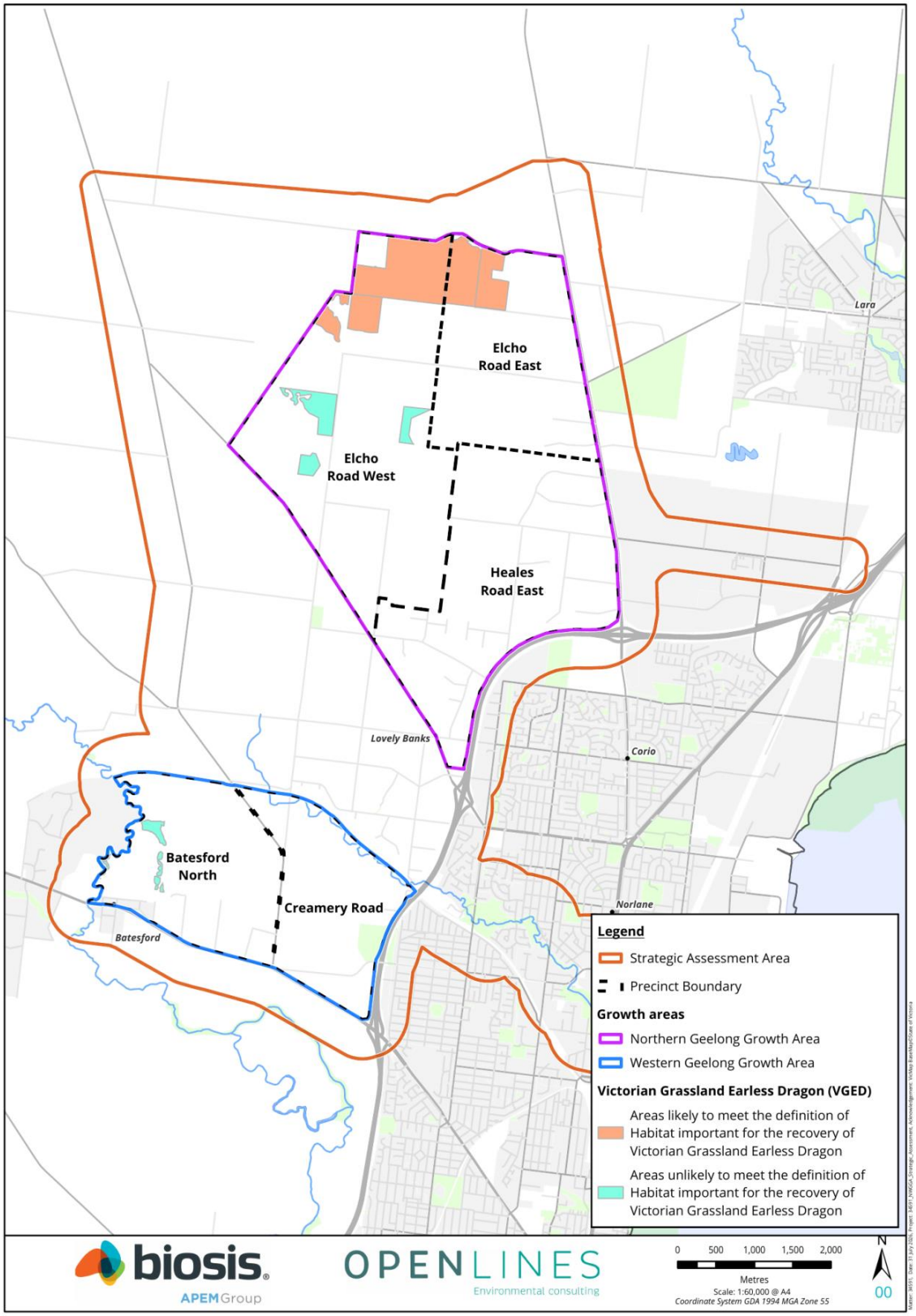


Figure 3-9: Potentially suitable areas for Victorian Grassland Earless Dragon

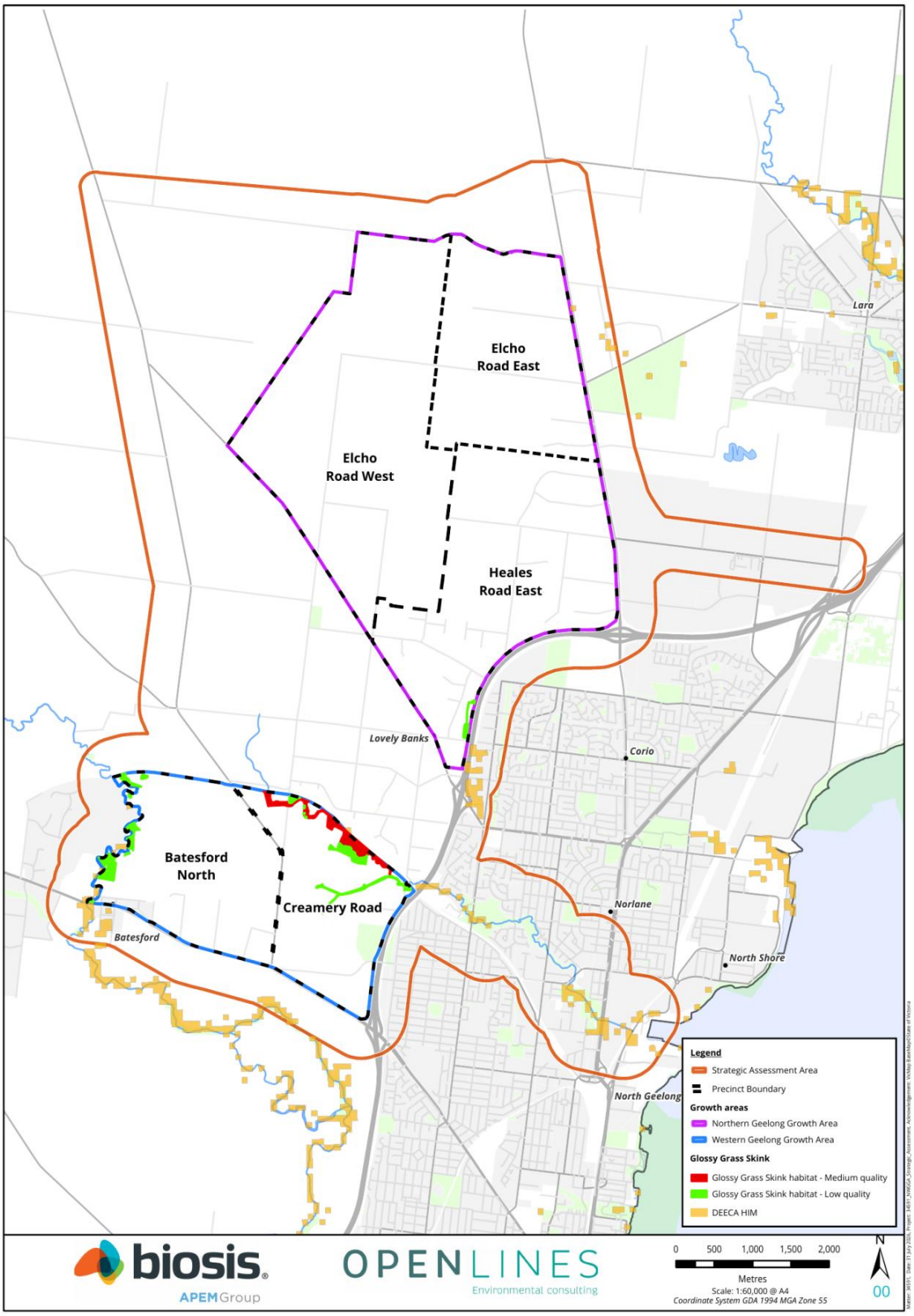


Figure 3-10: Glossy Grass Skink habitat

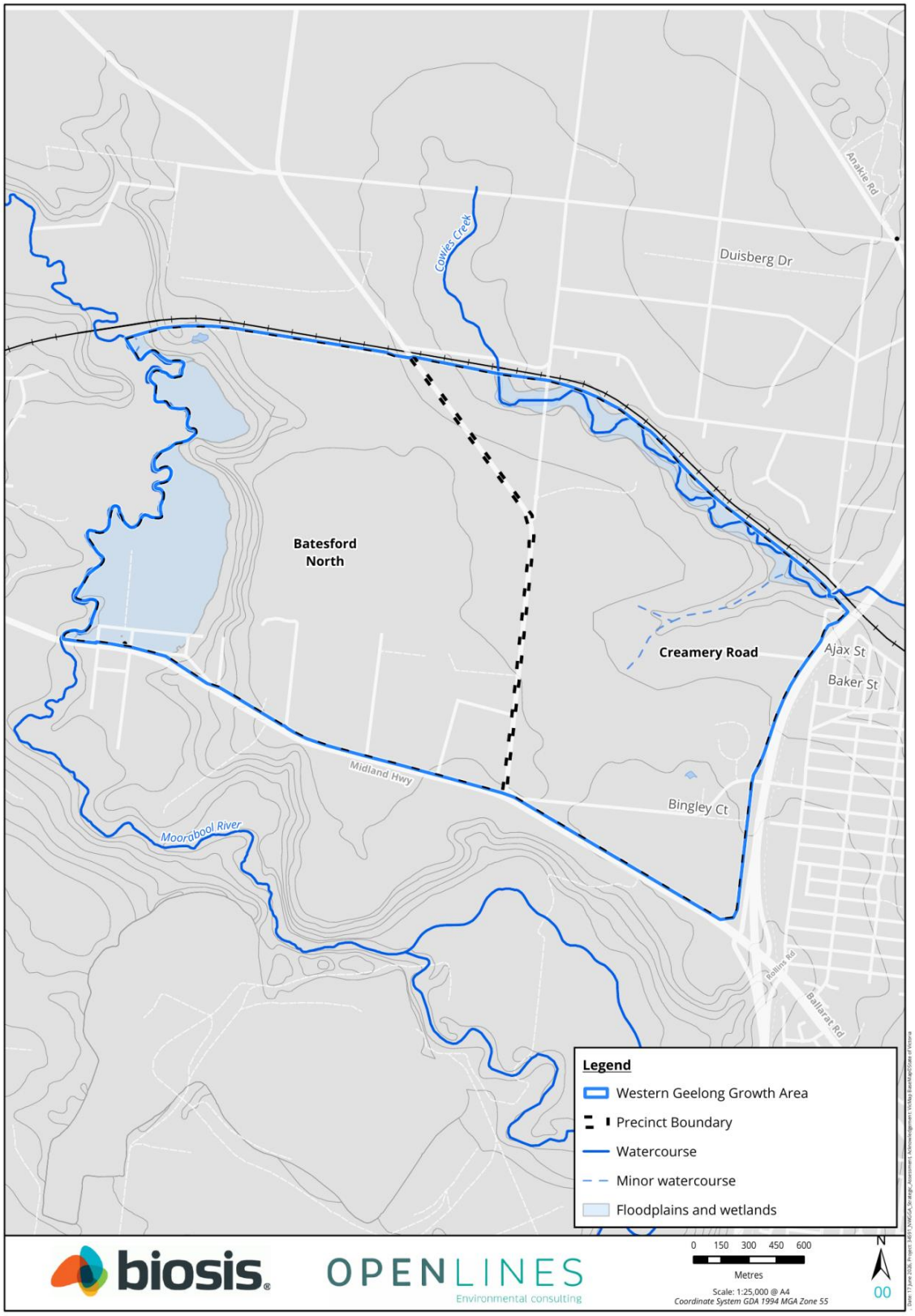


Figure 3-11: Hydrological values of the WGGA

3.3 KEY THREATS TO BIODIVERSITY VALUES WITHIN THE GROWTH AREAS

A key threat to biodiversity values within the Geelong locality is loss of habitat for development. The region surrounding Geelong has historically been heavily developed for agricultural production, resulting in substantial losses of native vegetation (DSE, 2003). The city of Geelong itself has also long been a centre of development in Victoria and has been the second largest city in Victoria since the 1930s (Victorian Places, 2015). Historical development and clearing have resulted in loss of native vegetation and landscape degradation, reducing habitat availability and quality for native species.

Geelong's population is continuing to grow, with an anticipated 2.5 per cent annual growth rate, and is anticipated to have an additional 500,000 residents by 2050 (The City of Greater Geelong, 2021). Careful management is required to minimise impacts of development to support this forecast increase in population.

Other key environmental threats within the region include:

- Invasive species, including pests and weeds
- Modification of water systems, including historical construction of infrastructure such as dams and weirs, ongoing water abstraction, and water pollution from agricultural and urban sources
- Disturbance pressures upon habitats used recreationally
- Climate change

Each of these is discussed briefly below. Refer to the detailed impact assessments in Part 4 of the SAR for further detail on how these threats relate to the key MNES.

3.3.1 INVASIVE SPECIES

As a result of extensive historical development, there is a high density of weeds within the Geelong locality. For instance, surveys conducted within the Growth Areas found a high density of weeds and introduced pasture species across most of the surveyed areas (EHP, 2021). Weeds also pose a threat within the wider region, including within the Port Phillip Bay (Western Shoreline) & Bellarine Peninsula Ramsar site (DELWP, 2020).

Pest animals are also present within the region. Within the Growth Areas, there is evidence the sites are occupied by rabbits, hares and foxes (EHP, 2021). Other invasive species, such as pigs, goats, are likely to also be present within the region. It is not considered possible to eradicate existing pests within the region and therefore asset protection approaches are considered the most effective management mechanism to minimise potential impacts to MNES (EHP, 2021).

Weeds listed as noxious under the *Catchment and Land Protection Act 1994* (CaLP Act) were recorded during the various on-ground assessments, including Chilean Needle-grass, African Box-thorn, Spear Thistle, Artichoke Thistle, Patterson's Curse, Bathurst Burr, Serrated Tussock and Sweet Briar. Similarly, there is evidence that the NWGGA is currently occupied by several pest fauna species listed under the CaLP Act, including Red Fox, European Rabbit and European Hare.

3.3.2 WATER SYSTEM MODIFICATION

All of the major watercourses within the Geelong region have experienced environmental impacts from development.

In-stream dams or similar barriers are located in Moorabool Rivers (upstream of Geelong) (CCMA, 2014). Dams pose a range of threats to riverine environments, including acting as barriers to fish passage, through altering characteristics of the water (such as water temperature and oxygen content), and through artificially altering water levels.

Water extraction from the Moorabool River occurs to support consumptive and agricultural purposes. Current environmental water allocations for both of these rivers are not sufficient to meet environmental needs into the future (DELWP, 2021a).

The environmental values of the Moorabool River, Barwon River, Hovells Creek, and Lake Connewarre Complex are all threatened by indirect impacts from agricultural and urban development within these catchments, including grazing pressures, invasive species, poor water quality, erosion and sedimentation, and degradation of native vegetation (CCMA, 2014).

3.3.3 RECREATIONAL DISTURBANCE

The Geelong locality is a popular destination for recreational purposes. Development of the Growth Areas will increase human activity in the vicinity of the Growth Areas, which can impact natural areas including conservation areas protected under the EPBC Plan and existing reserves. Recreational disturbance can be caused by:

- Trampling of flora species and disturbance to flora and fauna habitat
- Track creation
- Rock removal and disturbance
- Rubbish dumping and disturbance from associated clean-up activities
- Timber collection and removal of dead wood
- Illegal collection of flora and fauna species
- Dog walking
- Recreational activities such as mountain-biking, four-wheel driving, and horse riding

3.3.4 CLIMATE CHANGE

Climate change is rapidly emerging as one of the most significant threats to ecosystems and biodiversity (Prober *et al.*, 2019). Victoria's climate is among the driest and most variable globally, and ecosystems in Victoria are particularly vulnerable to climate change (Jin, Cant and Todd, 2009). Various changes in Victoria's climate have been recorded in recent decades: temperatures have increased by over 1.0°C since 1910, and fire season length and severity has increased. Future projections forecast that Victoria will continue to experience increased temperatures, in addition to less rainfall and more extreme weather events (DELWP, 2019). Victoria's Climate Change Strategy, released in 2021, outlines the Victorian government's approach to managing climate change, including emissions reductions targets and measures to build climate resilience (DELWP, 2021b).

More locally in the Geelong region, climate change poses specific threats through:

- Sea level rise, which particularly threaten coastal and estuarine habitats, including the Port Phillip Bay (Western Shoreline) & Bellarine Peninsula Ramsar site (DELWP, 2020)
- Increased storm intensity and frequency, which is likely to exacerbate the impacts of sea level rise (DELWP, 2020)
- Decreased water availability, which threatens water supply within the region and environmental values (CCMA, 2014; DELWP, 2021a)

4 Conservation program

4.1 INTRODUCTION

This Chapter describes the conservation program of the BCS and how it will be implemented.

The purpose of the conservation program is to:

- Ensure development in the Growth Areas avoids and minimises, mitigates, and offsets impacts to national, State and local biodiversity values
- Ensure outcomes in the BCS are achieved
- Implement the EPBC Plan's conservation framework

The conservation program has been developed in accordance with the offset mitigation hierarchy (DSEWPC, 2012; DELWP, 2017c) and the biodiversity objectives of the Framework Plan. The mitigation hierarchy requires impacts on biodiversity values to be firstly avoided and minimised to the greatest extent practicable, and then mitigated. The remaining residual impacts can then be offset.

The conservation program sets out commitments and measures that will be delivered for:

- Avoiding and minimising impacts to biodiversity values (see Section 4.3)
- Mitigating impacts to biodiversity values (see Section 4.4)
- Offsetting residual impacts to biodiversity values (see Section 4.5)

The commitments for the conservation program will be implemented through a series of detailed measures that are provided in the Commitments and Measure document.

4.2 POLICY CONTEXT

The Victorian Government's *Planning for biodiversity: guidance* (DELWP, 2017d) aims to assist local government to use the planning system to meet the objectives of the Planning Policy Framework (PPF) in relation to the protection and conservation of Victoria's biodiversity. The guidelines state that strategic planning is the most effective process under the planning system to protect and conserve biodiversity (DELWP, 2017d).

Key steps outlined for effective strategic planning include considering broader strategic policies and strategies, identifying areas of high biodiversity value, identifying where there is demand for development and resolving conflicts between development and biodiversity values, and choosing planning tools to protect high biodiversity value areas (DELWP, 2017d).

Strategic planning provides many benefits to biodiversity, including the:

- Ability to identify high biodiversity value areas at a landscape scale
- Best opportunity to effectively avoid and minimise impacts by directing development away from high biodiversity value areas and co-ordinating offsets to compensate for impacts strategically
- Ability to understand and address cumulative impacts of multiple developments within an area

The allocation of the proposed conservation areas has been based on a strategic planning process that considered the social, economic and environmental considerations, the ecological data and policy guidance outlined in Table 4-1.

Table 4-1: Key policy considerations for the City

Strategic consideration	Policy	Influence on the conservation program

Clause 12.01-1S – 'Protection of biodiversity' of the Victoria Planning Provisions	• Use biodiversity information to identify important areas of biodiversity, including key habitat for rare or threatened species and communities, and strategically valuable biodiversity sites
	• Strategically plan for the protection and conservation of Victoria's important areas of biodiversity
	• Ensure that decision making takes into account the impacts of land use and development on Victoria's biodiversity, including consideration of:
	  ○ Cumulative impacts
	  ○ Fragmentation of habitat
	  ○ The spread of pest plants, animals and pathogens into natural ecosystems
	• Avoid impacts of land use and development on important areas of biodiversity
	• Consider impacts of any change in land use or development that may affect the biodiversity value of national parks and conservation reserves or nationally and internationally significant sites, including Ramsar, JAMBA, CAMBA, and ROKAMBA sites
		The BCS uses the best available information to understand biodiversity values, identify priority areas and support decision making. Section 3.2 describes the ecological survey data, species database records, habitat and vegetation modelling.
		The BCS is part of a strategic planning process undertaken by the City to identify areas for development and growth to meet economic, social and planning challenges and protect high biodiversity value areas.
		The strategic planning process for the Growth Areas involved several key steps that are consistent with the steps outlined in *Planning for biodiversity: guidance* (DELWP, 2017d). It has led to the avoidance of the most important biodiversity in the Growth Areas within strategic conservation areas.
		These are high biodiversity value areas that contain the most important national, State and local biodiversity values in the Growth Areas and are considered likely to be viable in the long-term because of their size, condition, shape and location in the landscape
		The BCS was informed by a strategic assessment process that assessed the impacts of the development in the Growth Areas on MNES in the NWGGA SAR. This included long and short-term impacts, direct and indirect impacts, and cumulative impacts. The NWGGA SAR also considers potentially threatening processes including the fragmentation of habitat and the spread of pest plants and animals and pathogens.
		The impacts of the development on State biodiversity values, including cumulative impacts in the context of past native vegetation removal, will be assessed during precinct planning through the preparation of NVPPs at the precinct scale.
		The BCS includes commitments and measures that are expected to adequately manage the potential indirect impacts of the development on the Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar site.

Clause 12.01-1L – 'Protection of biodiversity' of the Victoria Planning Provisions	Ensure that land use and development enhances areas of native vegetation and other habitats	The conservation program will protect: • The largest habitat area for SLL in the NGGA • A substantial area of habitat for GSM in the NGGA

Strategic consideration	Policy	Influence on the conservation program
		• All high and moderate quality habitat and the vast majority of low quality habitat for GGF within the WGGA • Habitat potentially important for the recovery of VGED • Multiple other national, State and local biodiversity values • Areas of key habitat connectivity across the Growth Areas • Riparian areas that will help maintain ecological processes and water flows and quality
The Framework Plan, incorporated into the Greater Geelong Planning Scheme at Clause 11.02.	The biodiversity-related urban development objectives of the Framework Plan for each Growth Area are: • "Protect and regenerate biodiversity and cultural heritage values of the natural and constructed waterways along the Lovely Banks monocline and heritage values of the Elcho Homestead" • "Protect and regenerate biodiversity and cultural heritage values along the Barwon and Moorabool Rivers, Cowies Creek and the Dog Rocks Sanctuary and establish vegetated constructed waterways"	Key natural landscape features are highlighted by the Framework Plan for protection. In response the allocation of strategic conservation areas includes the river corridors and land on and adjacent the monocline.
Environmental Significance Overlay 4 – Grasslands within the Werribee Plains hinterland, within the Greater Geelong Planning Scheme	• To prevent a decline in the extent and quality of native vegetation and native fauna habitat of the Victorian Volcanic Plain. • To enhance the environmental and landscape values of the area. • To avoid the fragmentation of contiguous areas of native vegetation or native fauna habitat • To ensure that any use, development or management of the land is compatible with the long-term conservation, maintenance and enhancement of the grasslands • To avoid the destruction of habitat for native fauna resulting from the modification of land form and disturbance of surface soils and rocks • To enable areas of environmental significance, due to their native vegetation or habitat values, to be identified	The statement of environmental significance for ESO4 states the native vegetation of the Victorian Volcanic Plain is some of the most depleted vegetation in Victoria. Although the vegetation has been extensively cleared, some large areas of native vegetation remain that are also important for several threatened species, including Spiny Rice-flower and SLL. Development within the Growth Areas will lead to the removal of native vegetation and habitat on some land within ESO4. Despite the BCS leading to the removal of native vegetation and habitat within the ESO, the strategic management of large conservation reserves will lead to improved outcomes for native grasslands compared to individual permit applications under the ESO4 requirements, as the detailed ecological assessment and avoid, minimise and offset requirements have been applied in a strategic planning context rather than a site by site basis. A detailed assessment against the ESO objectives is provided in Appendix A.

Strategic consideration	Policy	Influence on the conservation program
Section 4B of the Flora and Fauna Guarantee Act (FFG Act) (the FFG Act 'biodiversity duty')	The FFG Act imposes a duty on public authorities to 'give proper consideration to' the Act's objectives in performing any of their functions that may impact on biodiversity, as well as consider several other additional matters. The duty applies to the City of Greater Geelong in relation to the development of the BCS as there is a reasonable expectation that the carrying out of this function may impact biodiversity. It is important to note that: • Meeting the duty requires the City to give 'proper consideration' to the Act's objectives and several other matters rather than mandating specific outcomes that the City must achieve for biodiversity • The City is required to comply with the duty in a manner which is consistent with the proper exercise of its functions under any other Act. The duty does not override the City's other statutory obligations. The duty does not prevent the City from exercising its statutory powers and discretion to weigh biodiversity matters against other matters it is required to consider when making decisions, such as social or economic objectives under the *Planning and Environment Act 1987*	The preparation of the BCS has been informed by the objectives of the FFG Act duty. This includes strategic planning, assessing impacts and establishing a set out outcomes and commitments and measures to address the impacts of the development on biodiversity values. For State and local biodiversity values, the outcomes and commitments are designed to ensure no net loss to biodiversity because of the removal of native vegetation. This is consistent with the objectives of State planning policy set out in the PPF and this FFG Act objective Unavoidable impacts on nationally listed matters will be offset outside the Growth Areas. The outcome for these offsets in the BCS is that they will make an important contribution to the recovery efforts for these matters consistent with this FFG Act objective to recover threatened species and communities so their status improves. A detailed assessment against the FFG Act duty is provided in Appendix A.
The City of Greater Geelong Environment Strategy 2020-2030	Key directions are (in part): Protect and enhance indigenous biodiversity prioritising: • Remnant biodiversity patches larger than 10 hectares • Threatened indigenous biodiversity species and communities • Under-represented Ecological Vegetation Classes • Establishment of biolinks to reduce habitat fragmentation • Protection of remnant old trees Restore indigenous biodiversity and habitat to support ecologically healthy waterways, estuaries and wetlands Restoring biodiversity in modified urban landscapes by: • Restore habitat into urban landscapes through the establishment of indigenous tree, shrub and understory plantings and other habitat elements such as wetlands, logs and stags	Protection and restoration of landscapes are central to the City's strategy and that is reflected in the approach to the BCS. The City's strategy seeks to protect patches greater than 10 hectares and this is reflected in the guiding principles. Restoration of habitat in urban landscapes can be embedded in the design guidelines and the City's future management of the Growth Areas through the delivery of urban development. The future management of public realm areas would need to be tailored to the biodiversity outcomes sought for key areas.

Strategic consideration	Policy	Influence on the conservation program
	• Restore degraded waterways and wetlands to create habitat and ecologically healthy water flows	

4.3 AVOIDANCE AND MINIMISATION OF IMPACTS

Avoidance of impacts from development in the Growth Areas is a priority at both a national and State level and is the first step in the mitigation hierarchy. The avoidance process provides opportunities to avoid and protect areas of high biodiversity value and is fundamental to a determination that commitments adequately address the likely impacts on biodiversity and in reducing the need for offsets to address the impacts of the development.

Avoidance is defined in the BCS as any land not directly impacted by development within the Growth Areas.

4.3.1 TYPES OF BIODIVERSITY AREAS

Biodiversity areas support biodiversity values within the Growth Areas and provide opportunities to protect, manage and restore biodiversity. They provide a key contribution to the delivery of the BCS outcomes set out in Section 2.1.

The guiding principles (Section 2.2) identify three categories of land within the Growth Areas that relate to biodiversity. They are:

STRATEGIC CONSERVATION AREAS

The primary purpose of the strategic conservation areas is the protection, management and restoration of biodiversity values within key locations of the Growth Areas. The identification of these areas requires a sufficient level of data to provide confidence in the conservation outcomes that can be delivered and support and justify the necessary level of commitment to protect these areas. The guiding principles around conservation planning in the BCS (see Section 2.2) were applied to identify the strategic conservation areas. These include consideration of:

- Biodiversity values
- Connectivity
- Ecological viability

Secondary uses within the strategic conservation areas may be possible where these do not compromise the biodiversity values or reduce the ability to manage the areas. For example, secondary uses may include social infrastructure such as walking trails, or infrastructure to manage stormwater.

AVOIDANCE AREAS

Avoidance areas represent areas which support Commonwealth, State, and/or local biodiversity values that can be reasonably avoided but may not be appropriate for formal protection and management (as an offset) under the EPBC Plan.

LANDSCAPE CONNECTIONS

Landscape connections are not conservation or avoidance areas, and are better described as restoration areas.

Landscape connections are locations within the Growth Areas which may be suitable for less intensive use or development, such as open space or waterways, and where opportunities may exist for providing co-benefits for biodiversity through the infrastructure siting and design phase. Their primary purpose is not conservation. However, they may provide a contribution to biodiversity protection and enhancement where that is complementary to the primary purpose of the area.

The Framework Plan has been used to inform the identification of landscape connections and refined with additional information about the future urban structure of the Growth Areas since the Framework Plan was completed.

See Section 4.3.6 for further details.

4.3.2 IDENTIFYING BIODIVERSITY AREAS

The BCS (through the strategic assessment) considered the proposed development for the Growth Areas set out in the Framework Plan and applied a strategic planning process to consider and resolve conflicts between:

- Areas identified as high biodiversity value
- Areas proposed for development in the Framework Plan
- The policies and strategies outlined above

This avoidance planning comprises three processes:

- Strategic level planning to locate the Growth Areas and identify initial avoidance priorities
- Locating and designing the development within the Growth Areas to avoid impacts
- Future precinct and site-scale planning

STRATEGIC LEVEL PLANNING

The avoidance process commenced at a landscape scale and informed the location of the Growth Areas.

The process was undertaken through a range of regional and State-scale processes. Relevant documents associated with this process include the G21 Regional Growth Plan (Geelong Region Alliance, 2013) and Plan Melbourne 2017–2050 (Victoria State Government, 2017). This process considered a wide range of factors across the broader region, including:

- The locations and characteristics of landscape features including protected matters and environmental values
- The locations of existing development and infrastructure
- The overall suitability of the site for delivering development objectives

Once the location of the Growth Areas was determined, high level strategic planning was completed through preparation of the Framework Plan. This process was based around urban development objectives and planning themes. Consideration of biodiversity values was one of the factors involved in planning decisions during this process. The Framework Plan identifies priorities for avoidance and minimisation that are reflected in a set of actions.

Key actions relating to avoidance of biodiversity in each of the Growth Areas are presented in Table 4-2 and how those actions influence the BCS.

Table 4-2: Key biodiversity actions from the Framework Plan for the Growth Areas

Action	Growth Area	Influence on the BCS
A network of linear corridors will be created to promote biodiversity linkages within neighbourhoods that connect between conservation areas, waterways and the open space network Corridors may be located as illustrated in Plan 9 and Plan 17 of the Framework Plan	Northern Western	Informed identification of landscape connections
Any conservation areas that are identified will prioritise the protection and enhancement of local indigenous flora and fauna species	Northern Western	Informed requirement for conservation management plans
The integrated transport network will protect, minimise impacts and revegetate roadside vegetation	Northern Western	Ecological surveys have included roadside vegetation to ensure all impacts and opportunities for avoidance are accounted for
Stormwater drainage management will minimise the downstream impacts on the Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar site	Northern Western	Inclusion of additional mitigation measures to protect the Ramsar site

Action	Growth Area	Influence on the BCS
A Native Vegetation Precinct Plan will be prepared for each precinct to determine the presence and management of significant flora, fauna and ecological communities	Northern Western	The preparation of an NVPP for each PSP will be undertaken
'Green-blue' connections will be designed to promote flora and fauna by distributing water to soil through natural infiltration and irrigation. Waterways illustrated on Plan 7 and Plan 15 of the Framework Plan will be designed to provide sufficient corridor width to establish continuous riparian reserves that allow for biodiversity values to thrive	Northern Western	Informed identification of landscape connections
Individual detailed master plans that outline the protection and enhancement of river and creek corridors will be prepared and incorporated within the relevant precinct structure plan including: • Cowies Creek, between Geelong Ring Road and Geelong-Ballan Road • Moorabool River, between Midland Highway and Geelong-Ballarat Railway	Western	Informed process for confirming boundaries and management objectives for the strategic conservation areas

GROWTH AREA LEVEL PLANNING

Following adoption of the Framework Plan, the preparation of the BCS has informed planning to refine the outcomes at a Growth Area level. This included:

- Detailed ecological surveys across the NGGA and the northern portion of the WGGA between November 2019 and December 2020 by Ecology and Heritage Partners (EHP) (described previously in Section 3.2.1)
- Consideration of the need for further avoidance based on the results of surveys
- Detailed analysis of a range of avoidance alternatives to inform decisions on the optimal layout for the Growth Areas

In considering these survey results, it was found that:

- Further avoidance and minimisation of impacts to high biodiversity value areas was required within both the NGGA and WGGA
- Further ecological investigations and confirmation of avoidance planning would be needed in the southern precincts of the WGGA closer to the time of planning and development for these areas

NGGA

A key aim of the City in defining further areas for avoidance within the NGGA was to identify high value biodiversity with the best potential for long term viability. The existing level of threats, particularly high priority weeds, is leading to rapid environmental decline in many parts of the NGGA. This has meant that merely avoiding impacts to biodiversity by not allowing development to occur is unlikely to provide a conservation outcome for those values as there is a high likelihood they will degrade over time without intervention. Instead, protection, restoration and ongoing management of these areas is needed to ensure their long-term viability.

It was recognised that identifying additional areas for avoidance to those already identified within the Framework Plan would have significant social and economic implications. The City used a decision making framework, known as structured decision making (SDM) (Gregory *et al.*, 2010), to help define priority areas for further biodiversity avoidance while also understanding and accounting for the social and economic ramifications of any decision.

The SDM projects addressed the following question: *What is the optimal layout of development and avoidance within the Northern Geelong Growth Area?* The City first undertook an SDM process in 2022 to determine the optimal layout of the NGGA. This layout was provided in the documents released for public exhibition in 2023.

Prior to the initial exhibition of the documents, VGED was rediscovered in Victoria in January 2023. Following rediscovery, detailed work was undertaken for the project including targeted surveys and detailed habitat assessments in the Growth Areas (Biosis, 2024), and a habitat attribute analysis which used a range of analysis to understand the potential value of the NGGA for VGED (Biosis & Open Lines, 2024).

An additional SDM process was undertaken for the strategic assessment in 2024 (see Supporting Document C to the SAR). This process considered both the information collected during the VGED survey program and habitat attribute analysis, and government agency and community feedback from the first round of public exhibition. Further avoidance was proposed as part of this process and included in the documents for the re-exhibition process for the strategic assessment.

Following re-exhibition, the City underwent a process to finalise the documents in 2026. One of the key issues to resolve related to finalising the Northern Conservation Area to be protected under the EPBC Plan, in the context of:

- Public submissions from the 2025 re-exhibition period
- The City's investigations into deliverability of the strategic assessment
- Uncertainty regarding tangible conservation outcomes for VGED

A detailed description of these considerations and the process undertaken to finalise the Northern Conservation Area is provided in Supporting Document E to the SAR. The outcome of this process was a revised layout of the Northern Conservation Area that now excludes 26.8 ha on 550 Elcho Road and 870 Geelong-Ballan Road (Avoidance Area C). To compensate for this loss of avoidance, the EPBC Plan commits to delivering an additional compensatory measure for VGED that will directly contribute to recovery of the species. Details about the offset package for VGED is provided in Supporting Document D to the SAR.

WGGA

Further avoidance in the Batesford North precinct (adjacent to the Moorabool River) was proposed in response to the rediscovery of VGED. Parts of the escarpment near the river support potentially suitable habitat attributes for VGED (see Figure 3-9) and are included in the Moorabool Avoidance Area.

4.3.3 COMMITMENTS FOR AVOIDANCE

The national level commitments for avoidance that are relevant to the Growth Areas are set out in Table 4-3, and the additional State level commitment is provided in Table 4-4.

Table 4-3: National level commitments in relation to avoidance

No.	Commitment
4	The Northern Conservation Area will be established in perpetuity to avoid and protect 50.5 ha of habitat for Striped Legless Lizard, 82 ha of habitat for Golden Sun Moth, and 81 ha of habitat potentially important for the recovery of Victorian Grassland Earless Dragon
5	A Conservation Management Plan will be prepared by a suitably qualified environmental professional and implemented for the protection and ongoing management of Striped Legless Lizard, Golden Sun Moth and Victorian Grassland Earless Dragon within the Northern Conservation Area
6	The Eastern Conservation Area will be established in perpetuity to avoid and protect 5.5 ha of habitat for Natural Temperate Grassland
7	A Conservation Management Plan will be prepared by a suitably qualified environmental professional and implemented for the protection and ongoing management of Natural Temperate Grassland within the Eastern Conservation Area
8	The gully avoidance area will avoid 3.5 ha of habitat for Striped Legless Lizard, 7 ha of habitat for Golden Sun Moth and 2.5 ha of Natural Temperate Grassland
9	The Cowies Creek Conservation Area will be established in perpetuity to avoid and protect habitat needed to support the continued persistence of the Growling Grass Frog and potential habitat for Glossy Grass Skink in the WGGA

10	A Conservation Management Plan will be prepared by a suitably qualified environmental professional and implemented for the protection and ongoing management of Growling Grass Frog, and areas of potential habitat for Adamson's Blown-grass and Glossy Grass Skink within the Cowies Creek Conservation Area
11	Habitat enhancement works for the Growling Grass Frog will be undertaken in Cowies Creek downstream of the WGGA to support the: • Long-term viability of the Cowies Creek metapopulation of Growling Grass Frogs • Persistence of the species within the WGGA
12	Development within the Moorabool avoidance area will be restricted to support the potential MNES values of the river corridor and the escarpment
19	Development within the portion of Heales Road East subject to process based development (as shown in Figure 4-1 of the Plan) will be designed and located to prioritise avoidance of impacts to MNES and native vegetation. This must ensure that any confirmed population or occurrence of MNES that would be considered important or notable (for instance, due to size, condition or potential contribution to the recovery of the MNES) is avoided and subsequently protected, maintained and managed to ensure the persistence of that population or occurrence in the long-term. Impacts to all other populations or occurrences will be avoided and minimised as far as practical

Table 4-4: State level commitment in relation to avoidance

No.	Commitment
i	Conservation Management Plans will be prepared and implemented for the protection and ongoing management of biodiversity values within each of the strategic conservation areas

4.3.4 NORTHERN GEELONG GROWTH AREA BIODIVERSITY AREAS

The NGGA includes the following biodiversity areas:

- Northern Conservation Area in the Elcho Road East and Elcho Road West precincts
- Eastern Conservation area in the Elcho Road East precinct
- Gully avoidance area in the Elcho Road East precinct

The biodiversity areas within the NGGA are identified in Figure 4-1. These areas:

- Support multiple important biodiversity values protected under Commonwealth and State legislation
- Focus on the largest mapped habitat area for SLL within the NGGA and a substantial area of mapped habitat for the GSM
- Protect the largest patch of Natural Temperate Grassland within the NGGA
- Protect a large area with potentially suitable habitat attributes for VGED which may support the recovery of the species
- Maintain landscape connectivity west of the NGGA

NORTHERN CONSERVATION AREA

The Northern Conservation Area is located in the north-west of the Growth Area. It is approximately 108 ha in size and supports the following biodiversity values (Figure 4-2):

- 55 ha of mapped native vegetation (Plains Grassland EVC 132)
- 108 ha of habitat for the GSM. Of this, 82 ha forms part of the formal offset commitment under the EPBC Plan
- 73.5 ha of habitat for the SLL. Of this, 50.5 ha forms part of the formal offset commitment under the EPBC Plan
- 105 ha of potentially suitable areas for the recovery of VGED
- Landscape connectivity west of the NGGA through the existing powerline easement

The Northern Conservation Area forms part of the offset commitments for the EPBC Plan.

The key aim of the Northern Conservation Area is to protect and manage native vegetation, habitat for SLL and GSM, and areas with potentially suitable habitat attributes for VGED in perpetuity. It will do this by:

- Protecting and improving the quality and (where possible) extent of native vegetation
- Protecting habitat supporting populations of SLL and GSM
- Improving the condition of habitat for SLL and GSM
- Protecting and improving potentially suitable areas for the recovery of VGED
- Where possible, increasing the area of occupied habitat for the SLL through regeneration or restoration of any potentially suitable areas

The Northern Conservation Area will be a success if:

- Native vegetation is retained and condition improves over time
- The populations of SLL and GSM persist and remain viable over the long term
- Habitat for SLL and GSM is retained and condition improves over time
- Habitat attributes for VGED are managed to support potential recovery of the species

Eastern Conservation Area

The Eastern Conservation Area is located in the Elcho Road East precinct. It is approximately 5.7 ha in size and supports 5.5 ha of mapped Natural Temperate Grassland (Figure 4-3). The Eastern Conservation Area forms part of the offset commitments for the EPBC Plan.

The key aim of the conservation area is to protect and manage Natural Temperate Grassland in perpetuity. It will do this by:

- Protecting Natural Temperate Grassland
- Managing Natural Temperate Grassland to maintain extent and improve condition over time

The Eastern Conservation Area will be a success if Natural Temperate Grassland is retained and managed to improve in condition over time.

The Eastern Conservation Area is adjacent to the gully avoidance area (discussed further below), which is known to support a population of SLL. Whilst not a key success factor, there is potential to undertake regeneration and/or restoration activities to facilitate the expansion of SLL individuals into the Eastern Conservation Area.

Gully avoidance area

The gully avoidance area is in the Elcho Road East precinct supporting the following biodiversity values (Figure 4-3):

- 3.5 ha of habitat for SLL
- 7 ha of habitat for GSM
- 5.6 ha of mapped native vegetation of which 2.5 ha is Natural Temperate Grassland

The gully avoidance area does not form part of the offset commitments for the EPBC Plan.

The aim of the avoidance area is to protect habitat for SLL, GSM and Natural Temperate Grassland. It will do this by:

- Protecting habitat for SLL, GSM and Natural Temperate Grassland and restricting development
- Providing connectivity to the Eastern Conservation Area to facilitate potential expansion of the range of the SLL

The gully avoidance area will be a success if its biodiversity values are maintained over time.

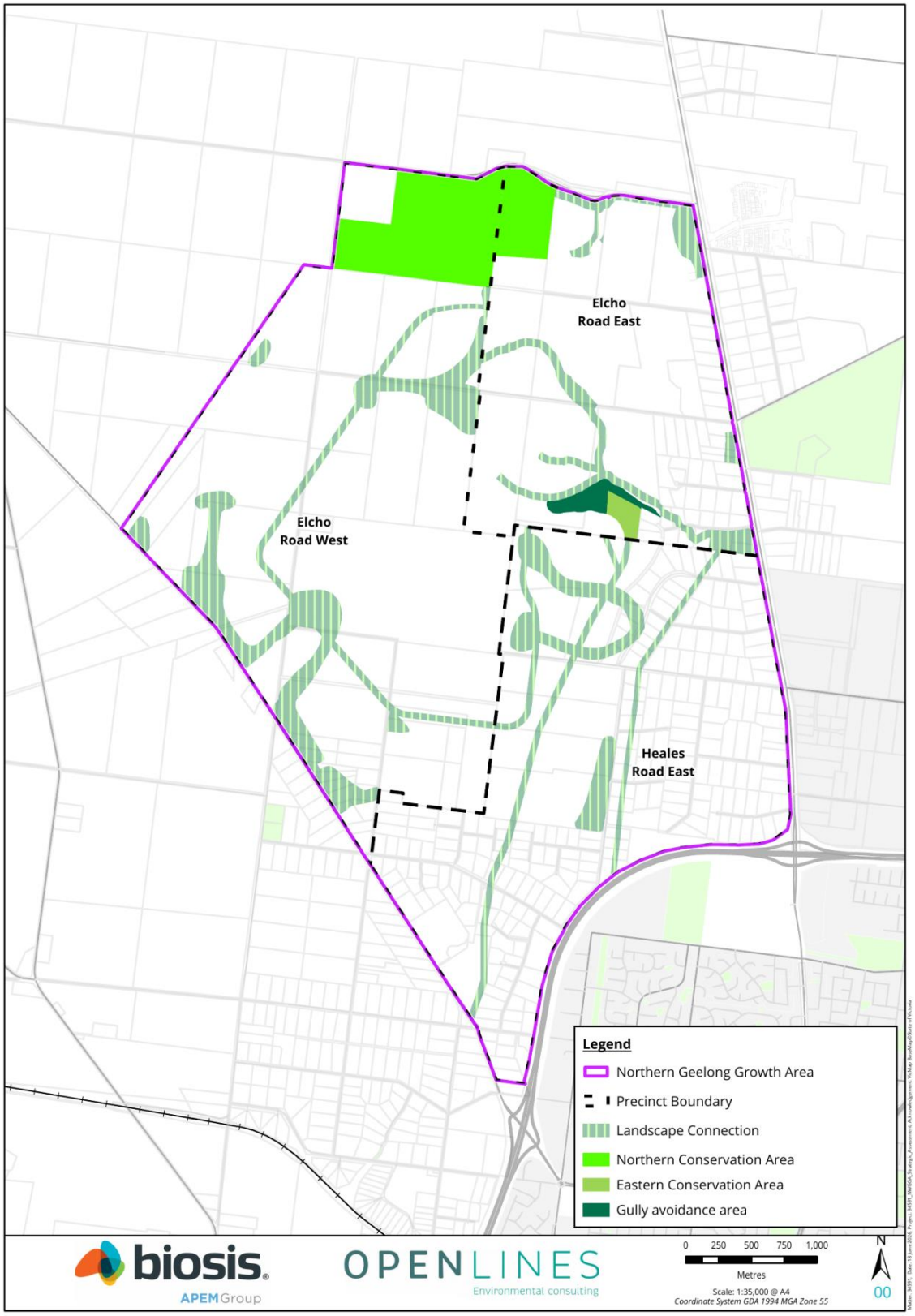


Figure 4-1: Biodiversity areas within the NGGA

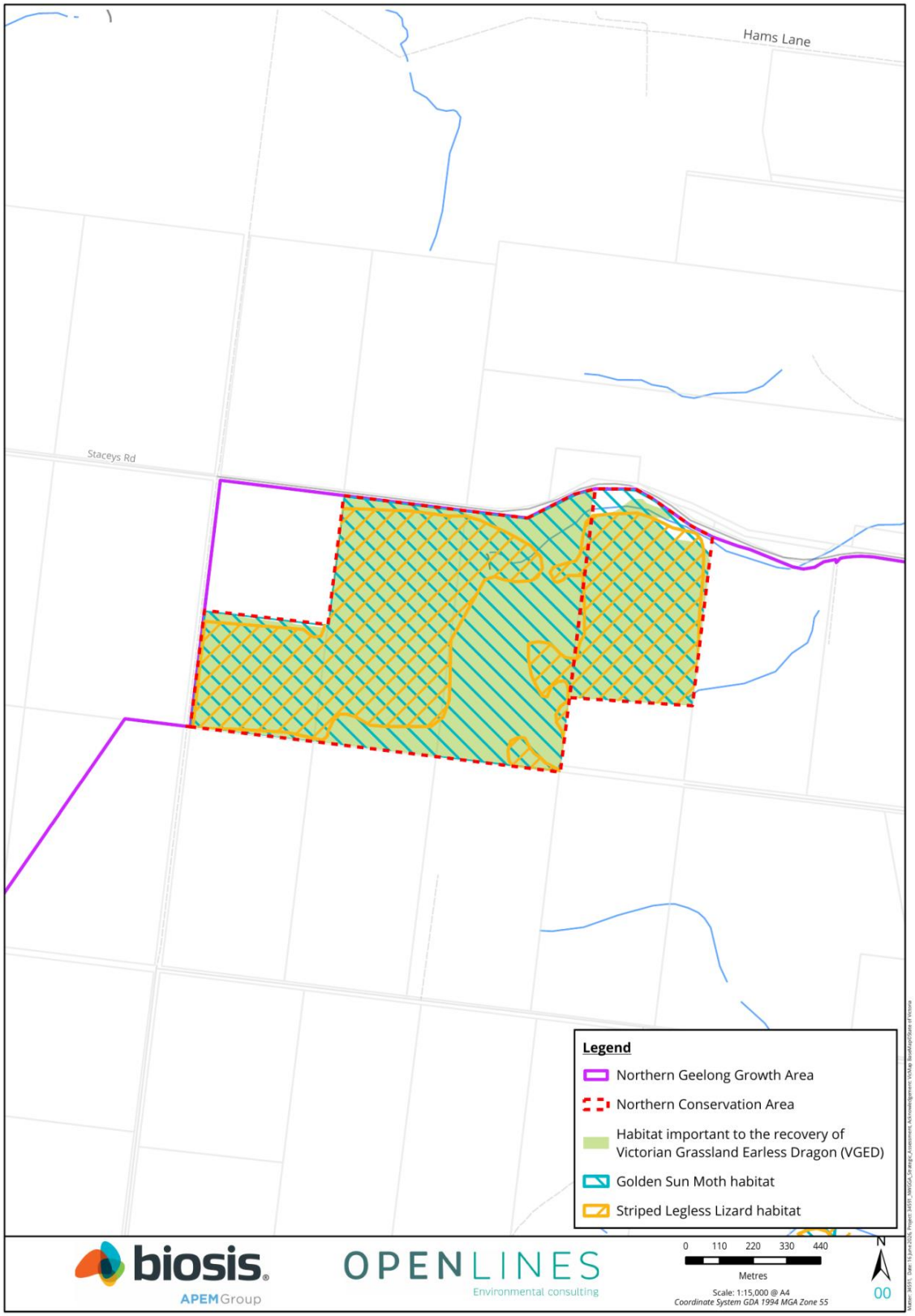


Figure 4-2: Northern Conservation Area

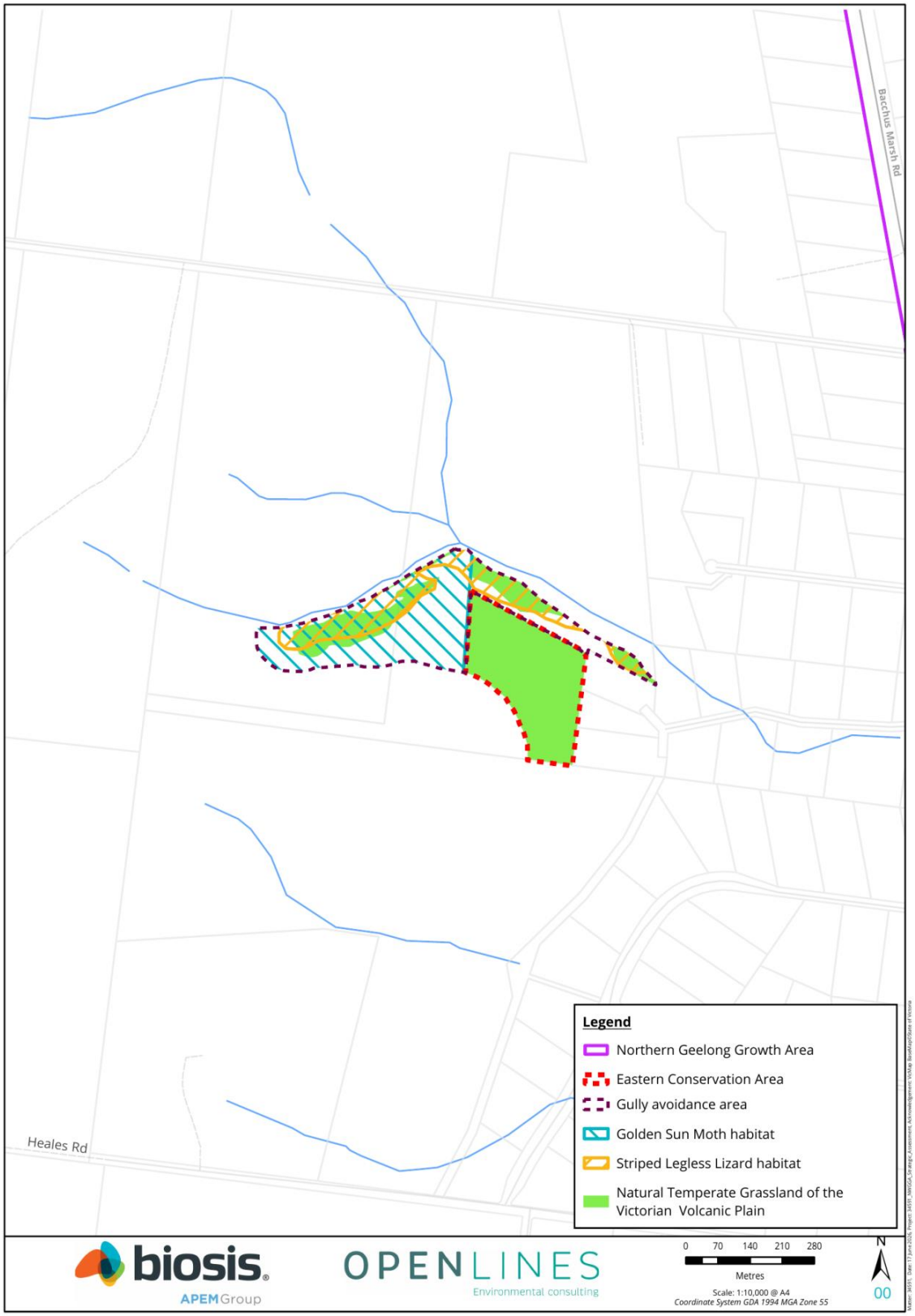


Figure 4-3: Eastern Conservation Area and gully avoidance area

4.3.5 WESTERN GEELONG GROWTH AREA BIODIVERSITY AREAS

The WGGA includes two biodiversity areas:

- Cowies Creek Conservation Area in the Creamery Road precinct
- Moorabool River Corridor and Moorabool avoidance area in the Batesford North precinct

The biodiversity areas within the WGGA are identified in Figure 4-4. They will be established to:

- Protect and regenerate biodiversity values along the creek/river corridors. This supports one of the Framework Plan's urban development objectives which identifies Cowies Creek and the Moorabool River as priorities for the protection and regeneration of creek and river corridors
- Protect cultural heritage values. There are a range of sites of cultural heritage significance in the creek/river corridors and the conservation areas will provide a level of protection for these. This supports the same urban development objective in the Framework Plan as the one that relates to biodiversity
- Provide for some social and stormwater infrastructure within the precinct that is sympathetic to the protection of biodiversity and heritage values. Social infrastructure may include walking trails and some open space facilities

Cowies Creek Conservation Area

The Cowies Creek Conservation Area supports:

- An important population of GGF that is connected to a larger metapopulation downstream, as well as all remaining habitat for GGF in the WGGA (see Figure 4-5 for a map of GGF habitat within the conservation area)
- Potential habitat for GGS (see Figure 4-6 for a map of GGS habitat within the conservation area)
- A previously known record of Adamson's Blown-grass
- Areas of mapped Creekline Grassy Woodland (EVC 68)

A key aim of the Cowies Creek Conservation Area will be to support the persistence of GGF within the WGGA and maintain the metapopulation dynamics with the broader Cowies Creek metapopulation downstream. It will do this by:

- Protecting high quality instream habitat
- Helping to improve the condition of lower quality instream habitat
- Protecting terrestrial habitat in buffer areas adjacent to the creek
- Regenerating areas of terrestrial habitat that are degraded through historical land uses
- Providing for the creation of off-stream habitat

Cowies Creek downstream of the WGGA provides habitat for the connected metapopulation of GGF that occurs along the creek. There are a range of opportunities to enhance habitat within this area to support:

- Long-term viability of the metapopulation
- Persistence of the species within the WGGA

The following habitat enhancement works for GGF will be considered as part of a detailed design process for the area downstream of the WGGA:

- The creation of one or more off-line wetlands to create habitat for the species
- Vegetation management to improve habitat quality for the species
- Infrastructure changes to improve connectivity for the species under the Bluestone Bridge along Cowies Creek

The Cowies Creek Conservation Area will be a success if:

- The population of GGF persists and remains viable over the long term
- Habitat for GGF, and potential habitat for Adamson's Blown-grass and GGS is retained and condition improves over time
- Metapopulation dynamics of GGF are retained with downstream populations of the species

MOORABOOL RIVER CORRIDOR AND MOORABOOL AVOIDANCE AREA

The Moorabool River Corridor and Moorabool avoidance area (Figure 4-7) is located alongside the western edge of Batesford North and flows south to join with the Barwon River.

The avoidance and protection of the Moorabool River Corridor and adjacent floodplain and escarpment will protect a range of State and local biodiversity values.

The Moorabool River is an important biodiversity habitat corridor between the Brisbane Ranges National Park and the Barwon River, and sustains critical ecological processes for native fish, macroinvertebrates, mammals, birds, and vegetation communities (CCMA, 2016). The river supports a diversity of native vegetation along the length of the waterway. EVCs which have been modelled and mapped adjacent to the Moorabool River include Low Rainfall Plains Grassland (EVC 132_63), Plains Grassy Woodland (EVC 55), Floodplain Riparian Woodland (EVC 56) and Stream Bank Shrubland (EVC 851) (DELWP, 2005).

The river also provides habitat for a number of native fish, including the Tupong (*Pseudaphritis urvillii*), Southern Pygmy Perch (*Nannoperca australis*), Australian Grayling (*Prototroctes maraena*), Common Galaxias (*Galaxias maculatus*) and Spotted Galaxias (*Galaxias truttaceus*) (CCMA, 2022). The river also supports the State significant Eastern Great Egret (*Ardea alba modesta*) (CCMA, 2014). GGF has been recorded in the lower reaches of the Moorabool, near to the convergence with the Barwon River.

The Moorabool avoidance area supports:

- 6.8 ha of areas assumed to support potentially suitable habitat attributes for VGED. Noting these areas are substantially fragmented by agricultural land on the surrounding properties, and considered too small to meet the definition of areas important for recovery for the species
- 6.6 ha of mapped native vegetation (Plains Grassland EVC 132)
- 0.3 ha of mapped Floodplain Riparian Woodland (EVC 56)

The key aim of the avoidance area is to enhance the ecological values of the river corridor, floodplain and adjacent escarpment. It will do this by avoiding impacts to potential MNES values and restricting development to minimise potential indirect impacts to the Moorabool River.

The avoidance and protection of the Moorabool River Corridor will contribute to landscape connectivity between the upper reaches of the Moorabool, through to the Barwon River and the downstream Lake Connewarre Wetland Complex (this forms part of the Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar site).

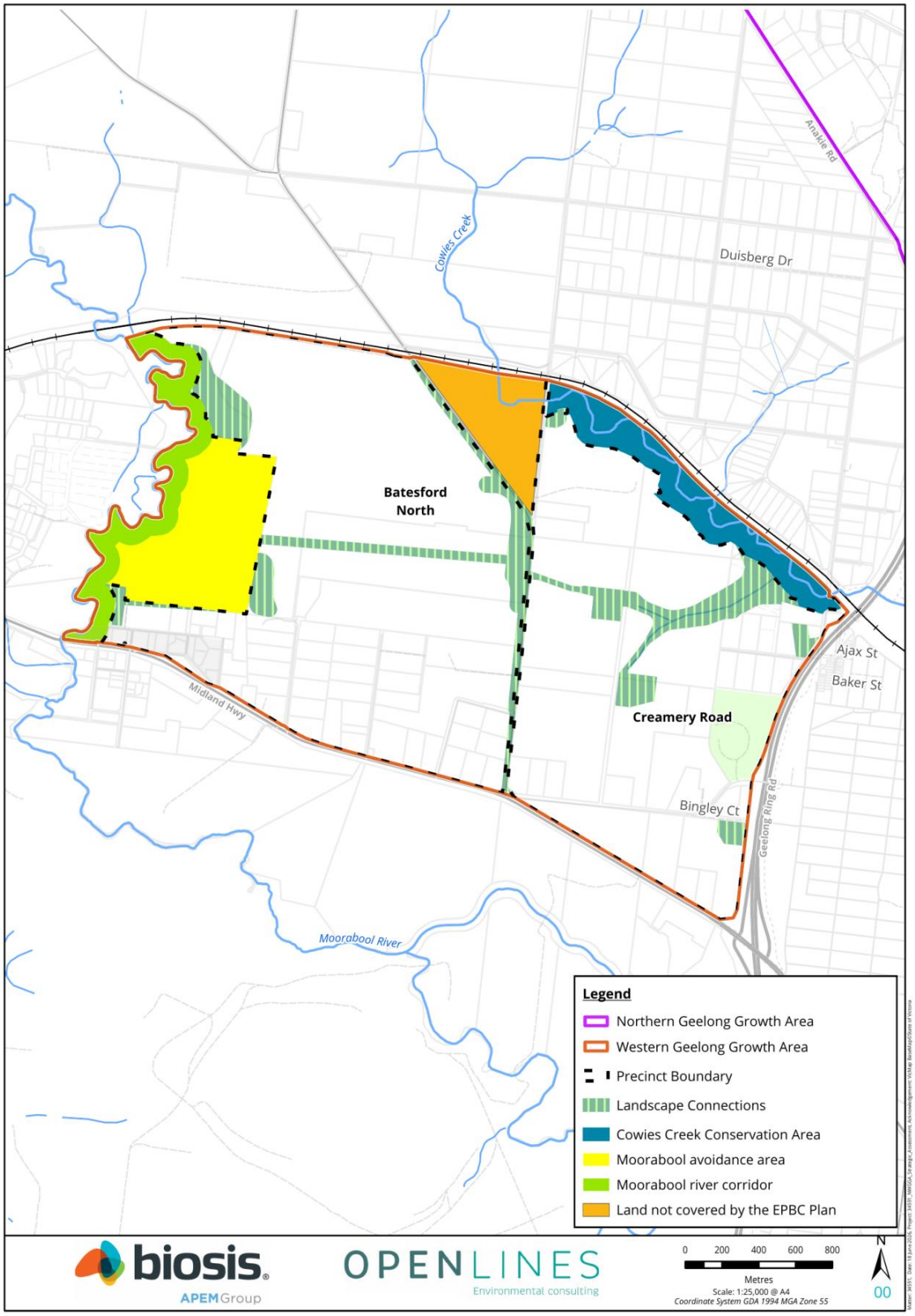


Figure 4-4: Biodiversity areas within the WGGA

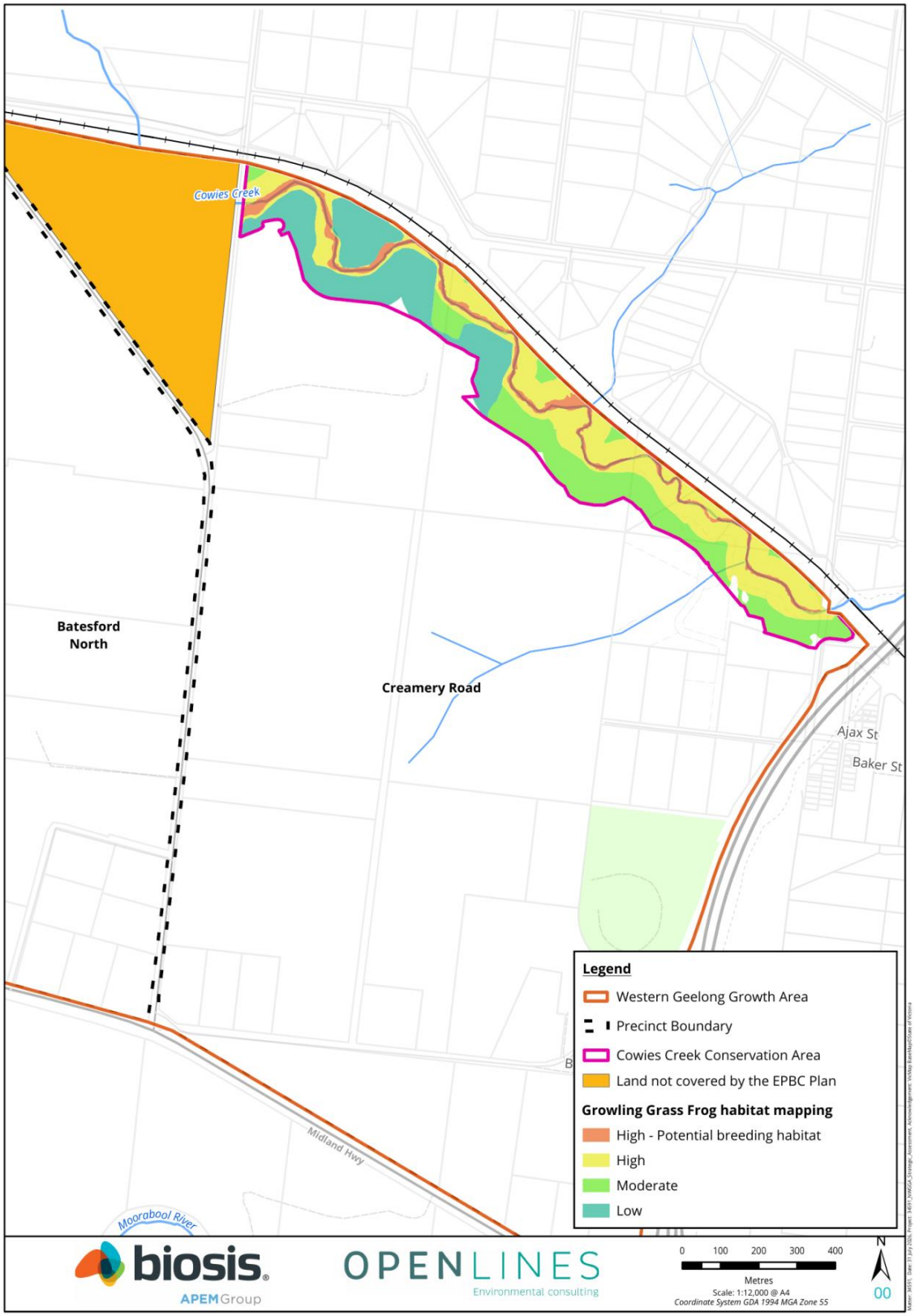


Figure 4-5: Cowies Creek Conservation Area and Growling Grass Frog

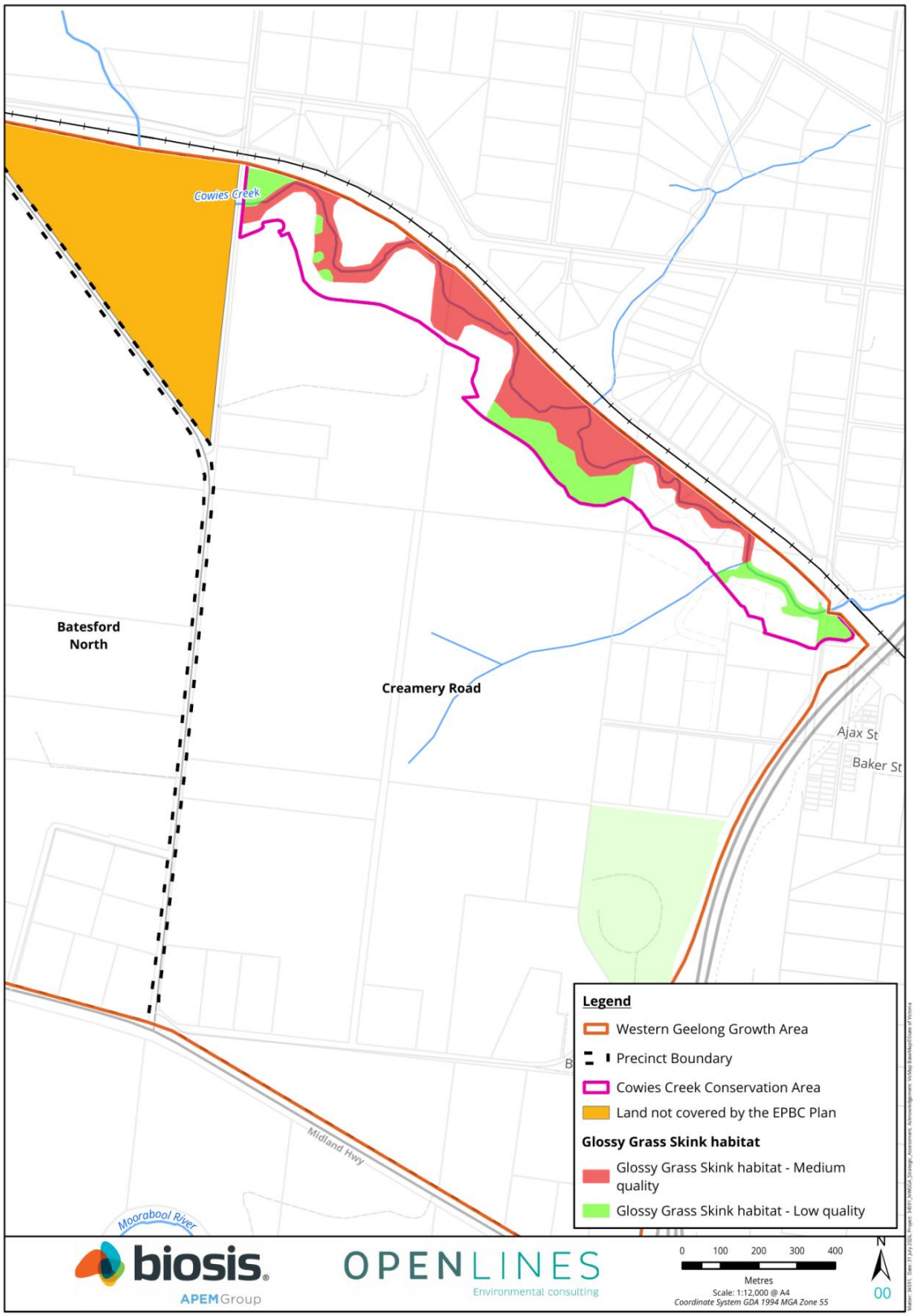


Figure 4-6: Cowies Creek Conservation Area and Glossy Grass Skink

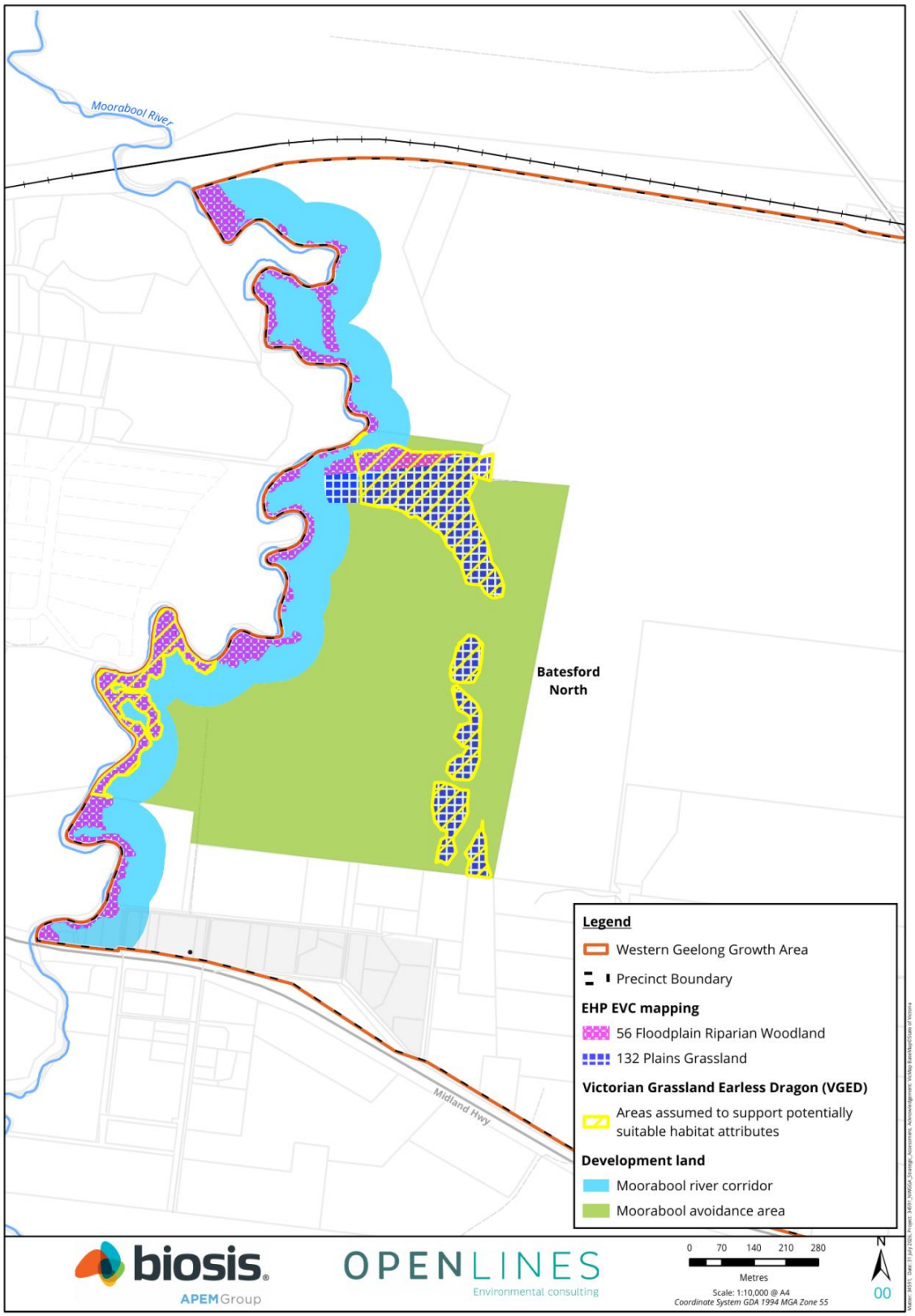


Figure 4-7: Moorabool River corridor and Moorabool avoidance area

4.3.6 IMPLEMENTATION PROCESSES AND MECHANISMS TO PROTECT AND MANAGE BIODIVERSITY AREAS

PLANNING TO FINALISE BIODIVERSITY AREA BOUNDARIES

At the time of finalising the BCS, significant planning around the boundaries of the conservation areas had been undertaken through the strategic assessment process as well as the PSP processes for Creamery Road (in the WGGA) and Elcho Road East (in the NGGA).

The boundaries of the Northern Conservation Area, Eastern Conservation Area, gully avoidance area, and the Cowies Creek Conservation Area as presented in the BCS are expected to be the final boundaries.

The boundaries of the Moorabool River Corridor and Moorabool avoidance area are more indicative and will be finalised following precinct structure planning for Batesford North.

Moorabool River Corridor

The boundaries of the Moorabool River Corridor will be finalised to ensure the area:

- Retains and incorporates biodiversity values associated with the river corridor in the strategic conservation area boundary including remnant vegetation.
- Utilises the full extent of the floodplain and escarpments (adjusted to reflect local topography)
- Reflects the relevant priorities or standards in the Corangamite Waterway Strategy 2014-2022
- Includes a minimum of 100 m of riparian land calculated from the centre line of the River which incorporates a minimum of 50 m from the top of bank within the Batesford North PSP

A master plan that outlines the protection and enhancement of the river corridor will be prepared and incorporated within the Batesford North PSP.

Moorabool avoidance area

The Moorabool avoidance area as shown in Figure 4-7 is indicative only. The extent of this area is informed by the parcel boundary of 68 Bridge Street, Batesford where it extends beyond the Moorabool River corridor. The exact location and size of the area will be confirmed during PSP planning for the Batesford North precinct.

PLANNING CONTROLS AND MECHANISMS TO SECURE LAND

The strategic conservation areas and avoidance areas will be protected through several planning controls, including:

- Identifying the areas in relevant PSPs as land to be protected for conservation in the urban structure maps of the precinct, to direct development away from these areas
- Applying an appropriate environment zone under the Greater Geelong Planning Scheme, to limit the use and development that can occur within each area
- Identifying the native vegetation in each area as 'to be retained' within the relevant NVPPs, to ensure a permit is required to remove that native vegetation

The Northern Conservation Area and Eastern Conservation Area will be purchased and/or vested in the City as reserves to be managed for conservation purposes and will be managed in perpetuity as Commonwealth offset sites via security agreements on title.

The Cowies Creek Conservation Area and the avoidance areas will be vested to the City or the Victorian Government as part of subdivision of the adjacent land as encumbered land. Where a lot does not contain developable land the City or Victorian Government will need to consider strategic purchase to secure the waterway corridors and conservation land.

Where applicable, the use of the Public Acquisition Overlay may be required by the City to secure strategic conservation areas.

CONSERVATION MANAGEMENT PLANS

The City will prepare and implement Conservation Management Plans (CMPs) over the life of the EPBC Plan to provide for the protection and ongoing management of the biodiversity values within the Northern Conservation Area, Eastern Conservation Area, and the Cowies Creek Conservation Area.

CMPs will be prepared in accordance with the Commonwealth Environmental Management Plan Guidelines (DoE, 2014). The CMP for Cowies Creek will also be prepared in accordance with the *Growling Grass Frog Habitat Design and Crossing Standards* (DELWP, 2017a).

Each CMP is proposed to include the following information, as relevant:

- Objectives of the CMP
- Boundaries of the conservation areas
- Native vegetation to be retained as identified in the relevant NVPP for the precinct
- Extent and condition of biodiversity values in the areas, including habitat and records
- Management actions and arrangements to protect, and where appropriate, restore, the biodiversity values of the conservation areas, including management methods, standards and techniques, roles and responsibilities, timing for implementation, funding and monitoring and reporting
- For the Northern Conservation Area, managing the threat of cat predation for SLL and VGED
- For the Cowies Creek Conservation Area, identifying any locations suitable for public access points, walking paths/trails, passive recreation, and water management assets and associated infrastructure

The City proposes to fund the implementation of the CMPs using the implementation fund established under the EPBC Plan's funding framework. The funding framework is described in Section 7.4 of the EPBC Plan, and the specific measures for funding are provided in the Commitments and Measures document.

Monitoring will be undertaken as part of the implementation to ensure that performance of each CMP is understood, and to ensure that management is responsive and adapts to any changing circumstances.

A draft of each CMP will be provided to NEPA and DEECA for consideration and comment prior to its finalisation and approval by the City.

CREATING LANDSCAPE CONNECTIONS

While the conversion of the Growth Areas to urban development will irreversibly change the ecological character and biodiversity values there is an opportunity to create urban environments that respect and restore aspects of the landscape.

The strategic conservation areas and avoidance areas will provide the key network of conservation reserves, and these areas will be complemented by a network of landscape connections that utilise biodiversity sensitive design interventions.

In areas nominated as landscape connections shown on Figure 4-1 and Figure 4-4, the preparation of PSPs and landscape plans for resulting subdivisions should:

- Design areas of open space, local parks, recreation reserves, trails, landscape and amenity areas, heritage sites and land encumbered by infrastructure where possible to connect and buffer strategic conservation reserves and connect other green and blue areas within the landscape and promote the integration of biodiversity features
- Utilise water sensitive urban design principles to provide drainage infrastructure, such as wetlands, channels or detention basins that integrate biodiversity features and promote the connectivity within the landscape
- Retain and restore existing planted native and remnant vegetation in existing road reserves to create fauna connections
- Minimise the crossing of waterways and linear reserves to reduce barriers to fauna connectivity
- Provide understorey and ground cover vegetation within landscape connections
- Consider significant view lines along landscape connections between urbanised and natural areas to promote connections with nature and the use of these assets

- Incorporate landscape design and planting schedules for landscape connections that (where appropriate):
  - Reproduce the EVC that would have occurred naturally in the area (predominately Plains Grassland throughout the Growth Areas)
  - Ensure all plants are indigenous and of local providence
  - Include other habitat elements such as wetlands, logs, rocks and stags
- Protect structurally sound old remnant and planted native trees within pocket parks or incorporate into road design to also maintain landscape and amenity values

4.4 MITIGATION OF IMPACTS

Mitigating impacts to biodiversity values is the second step in the mitigation hierarchy. The mitigation process reduces how likely or significant unavoidable impacts may be and further reduces the need for offsets.

In addition to minimising impacts through the avoidance planning process, impacts on biodiversity values will be further minimised by managing development to mitigate indirect impacts on biodiversity values that are avoided or that occur outside the Growth Areas. Development within the Growth Areas has the potential to lead to a range of indirect impacts that may adversely affect surrounding biodiversity values. These impacts relate to:

- Altered fire regimes
- Changes to water flows and water quality
- Disturbance due to noise, dust, or light
- Disturbance from increased public access to natural areas
- Fauna mortality and barriers to movement
- Inadvertent impacts on adjacent habitat or vegetation
- Predation or competition by pest or domestic fauna
- Spread of infection or disease
- Spread of weeds

The BCS will seek to minimise these impacts by, including requirements to implement:

- Standard mitigation measures delivered through the planning system. The Victorian planning system will deliver a range of standard mitigation measures through the development and implementation of PSPs and the provisions of the Greater Geelong Planning Scheme. These include measures such as stormwater management, erosion control, and construction environmental management plans
- Additional specific mitigation measures to address key biodiversity values associated with waterways, riparian areas and wetlands, and to protect the strategic conservation areas are required and outlined below. These additional specific mitigation measures were defined through the assessment of the indirect impacts of the development on MNES in the SAR. While these address specific risks to MNES associated with waterways, riparian areas and wetlands, and other biodiversity values within the strategic conservation areas, these additional measures will also minimise impacts to State and local biodiversity values
- Requirements to prepare and implement Conservation Management Plans for each of the strategic conservation areas

4.4.1 COMMITMENTS FOR MITIGATION

The national level commitments in relation to mitigation are set out in Table 4-5, and the additional State level commitment is provided in Table 4-6.

Table 4-5: National level commitments in relation to mitigation

No.	Commitment
13	Standard mitigation measures will continue to be implemented to minimise the indirect impacts of the development on MNES in accordance with the requirements of the *Greater Geelong Planning Scheme* (The City of Greater Geelong, 2022), as updated from time to time, and generally in accordance with the Framework Plan (The City of Greater Geelong, 2021)

No.	Commitment
14	The following additional specific mitigation measures will be implemented to minimise the indirect impacts of development on the strategic conservation areas and avoidance areas: • Establish a conservation interface for land abutting conservation areas and avoidance areas • Design and baffle public lighting in accordance with National Light Pollution Guidelines for Wildlife to prevent light spill and glare within the Cowies Creek Conservation Area • Ensure the Construction Environmental Management Plans for construction works on land immediately adjacent to the conservation areas have specific regard to the CMP for the adjoining land
15	Additional specific mitigation measures will be implemented to minimise the indirect impacts of the development on MNES associated with waterways, riparian areas and wetlands including: • EPBC listed threatened and migratory birds • Galaxiella toourtkoourt (Little Galaxias) • *Ranoidea raniformis* (Growling Grass Frog) • *Nannoperca obscura* (Yarra Pygmy Perch) • *Prototroctes maraena* (Australian Grayling) • *Pseudemoia rawlinsoni* (Glossy Grass Skink) • *Lachnagrostis adamsonii* (Adamson's Blown-grass) • Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar site

Table 4-6: State level commitment in relation to mitigation

No.	Commitment
ii	The following additional specific mitigation measures will be implemented to minimise the indirect impacts of development on the strategic conservation areas and avoidance areas: • Establish a conservation interface for land abutting conservation areas and avoidance areas • Design and baffle public lighting in accordance with National Light Pollution Guidelines for Wildlife to prevent light spill and glare within the Cowies Creek Conservation Area • Ensure the Construction Environmental Management Plans for construction works on land immediately adjacent to the conservation areas have specific regard to the CMP for the adjoining land

4.4.2 IMPLEMENTATION OF MITIGATION

Mitigation measures for biodiversity values will mostly be determined and implemented through the Victorian planning system as development proceeds (see Appendix A). This will deliver a range of standard mitigation measures that will address many of the potential indirect impacts of development within the Growth Areas.

The assessment of potential indirect impacts to MNES in the SAR identified several additional specific mitigation measures beyond those that will be delivered through the existing planning system. These are required to address specific risks to MNES associated with waterways, riparian areas and wetlands, as well as other environmental values within conservation areas. These specific mitigation measures will also provide additional protection to State and local biodiversity values.

Any potential indirect impacts of development on Victorian biodiversity values will be assessed under the planning permit process at the time development is proposed. While the additional specific mitigation measures are expected to benefit and minimise impacts to the key environmental values (both MNES and Victorian values), the planning permit process may determine further additional mitigation measures are needed to address specific matters.

IMPLEMENTATION OF ADDITIONAL SPECIFIC MITIGATION MEASURES

Waterways, riparian areas and wetlands commitment

The commitment relating to mitigating impacts on waterways, riparian areas and wetlands will be implemented through the preparation of technical studies to understand the key risks from development on MNES associated with Hovells Creek and the Moorabool River. These studies aim to:

- Address risks associated with changes to water quality and hydrology from the development in the Growth Areas
- Identify measures, standards or targets to mitigate impacts on MNES including, as relevant:
  - Water quality parameters
  - Water retention and flow management requirements
  - Limits on extraction or use
  - Habitat buffer requirements
  - Monitoring and reporting

Guidelines will be prepared based on the results of these studies to guide the preparation of PSPs and decisions on planning permits and permit conditions to ensure risks to MNES in relation to these impacts are adequately managed. A planning scheme amendment or other appropriate process will be undertaken to ensure the guidelines are considered during the preparation of PSPs and in decisions on planning permits and permit conditions.

Stormwater infrastructure and ongoing stormwater management will also consider the *Growling Grass Frog Habitat Design Standards* (DELWP, 2017b) and any other relevant advice or standards to minimise potential adverse impacts to habitat for the GGF within downstream reaches of Cowies Creek.

To ensure an appropriate level of assurance for this commitment, monitoring and reporting on the inclusion of these specific mitigation measures in PSPs and/or as conditions on permits will be undertaken as part of the monitoring program and annual progress reporting under the EPBC Plan's MERI program.

PRINCIPLES AND STANDARDS FOR INTERFACES TO STRATEGIC CONSERVATION AND AVOIDANCE AREAS

Conservation interfaces must be established in areas adjacent to strategic conservation areas and avoidance areas in accordance with the following principles and standards:

- Precincts should be designed to separate strategic conservation areas and avoidance areas from land that is built upon (e.g. private housing or industrial) by using one or more of the following land-uses: sealed roads, paths, recreational parks, public open space, ecological restoration areas, or grazing land. This buffer zone should be designed to maintain a distance of at least 20 m from the strategic conservation or avoidance area to the nearest built-up areas. The zone may include necessary fire breaks and fire management measures, including modified vegetation zones
- Where development is occurring under the Bushfire Management Overlay the advice of the Country Fire Authority will be sought regarding adequate buffers for bushfire risk mitigation. As required by clause 44.06 of the Victoria Planning Provisions, subdivisions must be designed to account for bushfire hazard on a site by site basis. For grasslands on relatively flat land a buffer of 20 m would be adequate in most instances
- Fences of urban or industrial properties should not abut a conservation area
- Natural or pre-development hydrological patterns should be maintained in all conservation areas where practicable. This applies to surface and groundwater flows
- Buffers should not be planted with species which could behave as environmental weeds (including vigorous rhizomatous grasses such as Buffalo, Kikuyu and Couch)
- Design and baffle public lighting in accordance with National Light Pollution Guidelines for Wildlife to prevent light spill and glare within the strategic conservation and avoidance areas
- Buffer zones should be managed. If an area is set aside to buffer a strategic conservation or avoidance area and will not be maintained for another purpose (e.g. road or park), its management must be provided for in a conservation management plan. This is likely to require only simple and routine maintenance (e.g. mowing or spraying) to minimise the spread of high risk invasive weeds
- Provide fire breaks and bushfire setback requirements within the urban development

- In general, trees should not be planted within 10 m of native grassland or wetland. This would typically mean that trees could be planted on the residential side of the adjoining roadside, but not the reserve side. However, there may be situations where closer tree planting is acceptable without compromising the values of the conservation area

4.5 RESIDUAL IMPACTS AND OFFSETS

Offsetting impacts to biodiversity is the final step in the mitigation hierarchy. It is intended to compensate for any residual adverse impacts that remain after impacts have been avoided, minimised and mitigated. Offsets are required in relation to both Commonwealth and State regulatory processes.

4.5.1 RESIDUAL IMPACTS FROM THE DEVELOPMENT WITHIN THE GROWTH AREAS

MATTERS OF NATIONAL ENVIRONMENTAL SIGNIFICANCE

The development under the EPBC Plan will result in the following residual impacts to MNES in the NGGA:

- Natural Temperate Grassland – 10.2 ha
- SLL habitat – 149.8 ha
- GSM – 651 ha (noting that 490.1 ha of this comprises areas of non-native vegetation)
- Habitat potentially important for the recovery of VGED – 64.2 ha

There will be no residual adverse impacts to MNES in the WGGA, and offsets are not necessary for development in that Growth Area.

A detailed assessment of the residual impacts of the development on MNES is provided in the Part 4 of the SAR.

STATE VALUES

In addition to MNES, residual adverse impacts will also occur to native vegetation protected by State biodiversity policy.

Within the NGGA, development will result in residual adverse impacts to 79.6 ha of mapped Low rainfall Plains Grassland (EVC 132_63). Within the WGGA, development within Creamery Road and Batesford North will result in residual adverse impacts to 35.2 ha of mapped Low rainfall Plains Grassland (EVC 132_63).

The impacts presented here are calculated conservatively by assuming that any land outside of the strategic conservation areas will be impacted. It is possible that there will be additional avoidance within the landscape connections for some of these values.

4.5.2 NATIONAL OFFSET COMMITMENTS

Offsets are a requirement under the EPBC Act for residual adverse impacts to MNES. The EPBC Plan establishes a strategic offsets package which is designed to meet the principles of the EPBC Act Offsets Policy (Commonwealth of Australia, 2012) and maximise the benefits to MNES from applying a strategic approach. It does this through prioritising early offsetting with good landscape context.

Conservation planning science (e.g., (Gordon *et al.*, 2011; Gordon and Peterson, 2019)) confirms the benefits of these approaches and supports the premise that the EPBC Plan's approach to offsets will be substantially stronger than what would occur under standard project-by-project approvals.

A detailed description of the EPBC offsets package is provided within Supporting Document D to the SAR, and a brief summary is provided here.

The EPBC Plan makes several national level commitments in relation to offsets (see Table 4-7). These commitments will lead to:

- Protecting and managing the Northern Conservation Area to provide benefits for SLL, GSM, and habitat potentially important for the recovery of VGED
- Protecting and managing the Eastern Conservation Area to provide benefits to Natural Temperate Grassland
- Securing additional land based offsets for Natural Temperate Grassland, SLL and GSM outside the Growth Areas
- Establishing a VGED Trust to provide funding for key recovery actions for the species

Table 4-7: National level commitments in relation to offsets

No.	Commitment
4	The Northern Conservation Area will be established in perpetuity to avoid and protect 50.5 ha of habitat for Striped Legless Lizard, 82 ha of habitat for Golden Sun Moth and 81 ha of habitat potentially important for the recovery of Victorian Grassland Earless Dragon
5	A Conservation Management Plan will be prepared by a suitably qualified environmental professional and implemented for the protection and ongoing management of Striped Legless Lizard, Golden Sun Moth and Victorian Grassland Earless Dragon within the Northern Conservation Area
6	The Eastern Conservation Area will be established in perpetuity to avoid and protect 5.5 ha of habitat for Natural Temperate Grassland
7	A Conservation Management Plan will be prepared by a suitably qualified environmental professional and implemented for the protection and ongoing management of Natural Temperate Grassland within the Eastern Conservation Area
16	Offset sites will be established to meet the following requirements: • 21 ha of Natural Temperate Grassland • 342 ha of known habitat for Striped Legless Lizard • 506 ha of known habitat for Golden Sun Moth These offsets will be delivered through a combination of: • The Northern and Eastern Conservation Areas (Commitments 4 and 6), and • Strategic offset locations outside of the NGGA to meet the balance of the offset requirements • Works in Kind, Land in Kind or Offsets in Kind arrangements where appropriate
17	The Victorian Grassland Earless Dragon Trust Fund will be established. A total amount of $12.7 million will be paid into the Trust Fund, to contribute to the recovery efforts of the species. Funding for the trust will include: • $1 million at establishment of the Trust Fund • $11.7 million paid via annual contributions, the final payment occurring before the end of Year 25 of the Plan
18	Offset delivery will keep pace with and occur ahead of impacts within the NGGA

IMPLEMENTATION OF THE EPBC OFFSETS PACKAGE

The EPBC offsets package will be implemented through a set of detailed measures which are set out in the Commitments and Measures document and are discussed in detail in Supporting Document D to the SAR. In summary, implementation is designed to ensure successful delivery and address the risks associated with a large scale, strategic approaches to offsets.

In particular, implementation of the offsets package will:

- Be coordinated and managed by the City
- Focus on offset sites that are as large as possible and well placed in the landscape to maximise the long term conservation outcomes. Offset sites should be located as close to the Growth Area as possible. However, if it can be shown that a greater conservation benefit for the impacted protected matter can be achieved by providing an offset further away, then this will be considered
- Use accepted mechanisms to secure and manage sites in-perpetuity
- Apply a set of contingency steps if offsets are not tracking appropriately

4.5.3 STATE OFFSETS COMMITMENTS

The following State level commitment is made in relation to offsets:

Table 4-8: State level commitment in relation to offsets

No.	Commitment
iii	State offsets to compensate for the loss to biodiversity from the removal of native vegetation will be provided in accordance with the *Guidelines for the removal, destruction or lopping of native vegetation* (DELWP, 2017c)

IMPLEMENTATION OF STATE OFFSETS

As per the commitment, State offsets and will be delivered according to the requirements of the *Guidelines for the removal, destruction or lopping of native vegetation*. The detailed measures to implement the State offset commitment are set out in the Commitments and Measures document.

Preparation of Native Vegetation Precinct Plans

NVPPs will be prepared as part of each PSP process, which will identify native vegetation to be retained and removed across each precinct. NVPPs will outline the offset requirements for native vegetation that can be removed and will detail the obligations for each property within the precinct. NVPPs and planning permits issued for use and development will require offset obligations to be met prior to impacts occurring.

Securing of native vegetation offset credits

The securing of State offsets will be the responsibility of the individual proponent based on their proposed level of impact. It is expected that proponents will secure offsets through the existing Victorian Native Vegetation Credit Register (NVCR).

Ongoing management, monitoring and reporting on the secured offsets will occur through DEECA's standard processes.

Co-location with Commonwealth offsets

State biodiversity policy requires native vegetation offsets to be secured within the same LGA or CMA region in which the impacts occur. For the Growth Areas this includes the Greater Geelong LGA or the Corangamite CMA. However, at the Commonwealth level, offsets are only required to be like-for-like in terms of the values (or MNES) that are being impacted. This means that suitable offsets can be delivered some distance from development as long as they are protecting the same MNES and associated habitat that is being impacted.

The co-location of State offsets with Commonwealth offsets is preferable in terms of cost efficiencies (i.e. reducing the need to purchase separate offsets). However, potential third-party offset sites supporting the MNES that are being impacted within the Growth Areas are either extremely scarce or unavailable elsewhere within the Greater Geelong LGA or Corangamite CMA. Competing interests such as other preferable land-uses and high land values contribute to this issue. Therefore, it is expected that State offsets will be decoupled from the Commonwealth offsets and delivered separately.

If proponents are successful in finding and securing a site that can achieve co-location of State and Commonwealth offsets and offset registration timing aligns, then co-located offsets would be viable, subject to DEECA and NEPA approval processes.

PAST REMOVAL OF NATIVE VEGETATION AND ASSUMED AND CONSEQUENTIAL LOSSES

The City will consider cumulative impacts in the context of past removal of native vegetation and assumed and consequential losses at a precinct scale through the preparation of PSPs and NVPPs for each precinct.

State policies in relation to native vegetation removal, including the Native Vegetation Guidelines, do not provide for the assessment of native vegetation removal at a Growth Area scale. To the extent that the policies set out in the Native Vegetation Guidelines are relevant in a strategic planning context, they are applicable at a precinct scale.

Each PSP and NVPP within the Growth Areas will be the subject of a separate planning approval process under the *Planning and Environment Act 1987* (PE Act), and relevant policies in the Native Vegetation Guidelines in relation to native vegetation removal will be considered and applied at that stage of the planning process.

The Native Vegetation Guidelines are required to be considered by the City when preparing each of the planning scheme amendments for each PSP within the Growth Areas, and are required to be applied by the City when developing each of the NVPPs. In these circumstances, the Growth Areas are best understood as a series of separate projects comprising each PSP, NVPP and associated planning scheme amendment.

This precinct-scale approach further supported by guidance in the Assessor's Handbook (DELWP, 2018). The Assessor's Handbook includes a set of criteria in Table 11 of the handbook and descriptions and examples at pages 48 to 50 to help determine if development should be considered as a single project or multiple separate projects.

The criteria in Table 11 of the *Assessor's Handbook* and a brief response to each is set out in Table 4-9. The guidance in the handbook supports the consideration of State policies in relation to native vegetation removal at a precinct scale.

This precinct-scale approach is also consistent with the current approach across Victoria in areas of large scale urban development, where in practice, individual PSP and NVPPs are commonly treated as a separate project in the application of State policies in relation to native vegetation removal.

Table 4-9: Consideration of criteria in Table 11 of the Assessor's Handbook

Criteria	Response
Is the entire project planned by one applicant?	The City is preparing a series of separate and distinct PSPs and NVPPs which will be the subject of individual planning scheme amendments within the Growth Areas over a period of approximately 10 to 15 years
Will the project receive a single approval?	Each PSP and NVPP will receive a single approval via an associated planning scheme amendment (rather than the Growth Areas receiving a single approval)
Will the project be funded to meet a single objective?	Each PSP will be prepared and funded to achieve multiple objectives, and those objectives will not be defined until the relevant PSP is prepared. Funding agreements with different landholders will facilitate the individual PSPs
Were all components or stages of the project planned together?	All components of an individual PSP and NVPP will be planned together at a level of detail that allows an assessment of native vegetation removal. Conversely, when the Framework Plan was implemented in the planning scheme, the components of the Growth Areas were not planned together at a level enabling this assessment
Are all components or stages of the project reliant on each other?	All components of an individual PSP and NVPP are reliant on each other and are planned together and introduced via a specific planning scheme amendment. The PSPs within the Growth Areas are not wholly reliant on each other, and can progress individually in the absence of the other PSPs
Are the individual components or stages or the project in close proximity?	The components of the individual PSPs and NVPPs are interconnected and in close proximity to each other. The individual precincts which make up the Growth Areas are not all in close proximity to each other

4.5.4 RISKS ASSOCIATED WITH OFFSET AVAILABILITY AND DELIVERY CERTAINTY

One of the key risks in relation to both Commonwealth and State offsets are potential challenges in finding and securing suitable offsets over time. It is anticipated that there will be a diminishing supply of suitable offset sites over time due to declining environmental values and competition in the offset market as other large projects also seek to offset their impacts.

At a minimum, the delivery of offsets will need to keep pace with the timing of impacts. There is a risk that development could be stalled where there is a delay in finding and securing offsets.

To minimise this risk eventuating, the EPBC Plan commits to securing a significant proportion of Commonwealth offsets early when it is anticipated that the offset market will be less constrained. This also drives improved conservation outcomes due to the benefits of advanced offsetting. Analysis about likely State offsetting requirements suggests that risks around offset availability is likely to be substantially lower.

5 Implementation

The steps required to implement the conservation program and commitments from the BCS are set out in Table 5-1.

Table 5-1: Steps to implement the conservation program and commitments from the BCS

Action	Timing	Responsibility
Undertake a planning scheme amendment to the Greater Geelong Planning Scheme to update the Framework Plan and Clause 11.02 to include: • The following on the future urban structure plan: o Northern Conservation Area o Eastern Conservation Area o Gully avoidance area o Cowies Creek Conservation Area o Moorabool River corridor o Moorabool avoidance area • The following in Clause 11.02: o Strategy to confirm the protection of the strategic conservation areas and avoided areas for conservation purposes o Introduce the Funding Framework to provide for the coordinated funding and delivery of offsets in the Northern Growth Area	Commence the process following Council adoption of the EPBC Plan and BCS	City of Greater Geelong – Strategic Planning
Apply the public acquisition overlay to properties identified for conservation purposes where a strategic purchase by the City or Victorian Government is required.	As required to facilitate land acquisition	City of Greater Geelong – Strategic Planning
Incorporate biodiversity sensitive urban design responses into the preparation of PSPs to facilitate the landscape connections shown in the BCS.	During preparation of a PSP	City of Greater Geelong – Strategic Planning
Prepare NVPPs for each precinct based on the retention of native vegetation identified in the BCS.	Concurrently with the preparation of the BCS	City of Greater Geelong – Strategic Planning
Prepare ecological and water studies for the Hovells Creek and Moorabool River to ensure that stormwater from development does not directly or indirectly impact the downstream Ramsar wetland and local biodiversity values.	During the preparation of the Elcho Road East PSP and Batesford North PSP.	City of Greater Geelong – Strategic Planning
Prepare conservation management plans for the Northern Conservation Area, Eastern Conservation Area and Cowies Creek Conservation Area.	Concurrently with the PSP containing the conservation area	City of Greater Geelong – Environmental Planning
Ensure that preparation of PSPs including strategic conservation areas includes appropriate consideration of the conservation interface and future development is required to prepare and comply with a construction environment management plan for works within or adjacent to a conservation reserve.	During the preparation of the UGZ schedule and requirements and guidelines in the PSP	City of Greater Geelong – Strategic Planning and Environmental Planning

Action	Timing	Responsibility
Apply appropriate zoning (e.g. public conservation and resource zone) to strategic conservation areas and avoidance areas when preparing precinct structure plans	During the preparation of the PSP and UGZ schedule	City of Greater Geelong – Environmental Planning
Prepare landscape and planting guidelines for public and private development within and adjacent to blue-green infrastructure and identified as landscape connections.	Post approval of the EPBC Plan	City of Greater Geelong – Environmental Planning

6 Assurance

Delivery of the BCS is supported by, and builds on, the assurance framework set out in Section 6 of the EPBC Plan to help ensure that implementation is successful. There are significant efficiencies in applying the same assurance approach to deliver both the national and State level commitments and measures that are set out in the BCS.

A high-level summary of the approach to assurance is presented here with details provided in the EPBC Plan and the Commitments and Measures document.

The key elements of assurance are:

- A strong set of governance arrangements to support delivery of the commitments and measures. The City will lead implementation and work with regulators, developers, landholders and other stakeholders to implement the BCS
- A funding program established by the EPBC Plan to implement the national level commitments and measures. This will be supported by additional funding through standard PSP and development processes to implement State level commitments and measures
- Implementation of a monitoring, evaluation, reporting and improvement (MERI) program to provide a system for understanding if outcomes and commitments are being achieved, communicating to regulators and the public, and adapting implementation as needed. The State level outcomes, commitments and measures will be integrated into the MERI program established by the EPBC Plan
- A compliance program to ensure commitments and measures that relate to third-parties are implemented appropriately

References

Biosis (2024) 'Victorian Grassland Earless Dragon, targeted surveys, and habitat suitability assessment - Geelong Growth Areas'.

Biosis & Open Lines (2024) *Victorian Grassland Earless Dragon Habitat Attribute Analysis*.

CCMA (2014) 'Corangamite Waterway Strategy 2014-2022'.

CCMA (2016) 'Moorabool River Environmental Water Management Plan'.

CCMA (2022) 'Corangamite Regional Catchment Strategy'. Available at: https://corangamite.rcs.vic.gov.au/.

Commonwealth of Australia (2012) 'Environment Protection and Environmental Offsets Policy', (October).

Dahlhaus, P. *et al.* (2003) 'Victorian Volcanic Plains Scoping Study'. CSIRO Land and Water.

DAWE (2021) 'Conservation Advice for *Synemon plana* (Golden Sun Moth)', *2021* [Preprint]. Department of Agriculture, Water and the Environment.

DELWP (2005) 'Native Vegetation - Modelled 2005 Ecological Vegetation Classes (with Bioregional Conservation Status)'. Department of Environment, Land, Water and Planning.

DELWP (2017a) 'Growling Grass Frog Crossing Design Standards Melbourne Strategic Assessment'. Department of Environment, Land, Water and Planning.

DELWP (2017b) 'Growling Grass Frog Habitat Design Standards Melbourne Strategic Assessment'. Department of Environment, Land, Water and Planning.

DELWP (2017c) 'Guidelines for the removal, destruction or lopping of native vegetation'.

DELWP (2017d) 'Planning for biodiversity: guidance'.

DELWP (2018) 'Assessor's handbook – applications to remove, destroy or lop native vegetation'.

DELWP (2019) 'Victoria's Climate Science Report 2019'.

DELWP (2020) 'Port Phillip Bay (Western Shoreline) & Bellarine Peninsula Ramsar Site Ecological Character Description'. Department of Environment, Land, Water and Planning.

DELWP (2021a) 'Central and Gippsland Region Sustainable Water Strategy Discussion Draft'. Department of Environment, Land, Water and Planning.

DELWP (2021b) 'Victoria's Climate Change Strategy'. Department of Environment, Land, Water and Planning.

DELWP (2022) 'Geomorphology of Victoria'. Dataset published by Department of Environment, Land, Water and Planning.

DEPI (2013) 'Biodiversity Conservation Strategy for Melbourne's Growth Corridors'.

DSE (2003) 'Biodiversity Action Planning: Strategic Overview for the Victorian Volcanic Plain Bioregion'. Victorian Government Department of Sustainability and Environment.

DSEWPC (2012) 'Environment Protection and Biodiversity Conservation Act 1999 Environmental Offsets Policy'.

EHP (2021) 'Existing Ecological Conditions: Northern and Western Geelong Growth Areas'. Prepared for the City of Greater Geelong.

Geelong Region Alliance (2013) 'G21 Regional Growth Plan'. G21 Geelong Region Alliance.

Gordon, A. *et al.* (2011) 'Assessing the impacts of biodiversity offset policies', *Environmental Modelling & Software*, 26(12), pp. 1481–1488. Available at: https://doi.org/10.1016/j.envsoft.2011.07.021.

Gordon, A. and Peterson, I. (2019) *Cumberland Subregion Conservation Plan - Vegetation Trend Analysis*. Melbourne, Victoria.

Gregory, R. *et al.* (2010) *Structured Decision Making: A practical guide to environmental management choices*. Wiley-Blackwell.

Jin, C., Cant, B. and Todd, C. (2009) *Climate change impacts on wetlands in Victoria and implications for research and policy*. Citeseer.

Prober, S.M. *et al.* (2019) 'Recent climate-driven ecological change across a continent as perceived through local ecological knowledge', *PLOS ONE*. Edited by J. Hewitt, 14(11), p. e0224625. Available at: https://doi.org/10.1371/journal.pone.0224625.

Rowe, D. (2021) 'About Corayo: A Thematic History of Greater Geelong'. The City of Greater Geelong.

The City of Greater Geelong (2020) 'Environment Strategy 2020–30'.

The City of Greater Geelong (2021) 'The Northern and Western Geelong Growth Areas Framework Plan.'

The City of Greater Geelong (2022) 'Greater Geelong Planning Scheme'.

Victoria State Government (2017) 'Plan Melbourne 2017-2050'.

Victorian Places (2015) 'Geelong'. Monash University, University of Queensland.

Williams, N. (2022) 'Southern Volcanic Plain'. University of Melbourne, Ecolinc. Available at: https://grasslands.ecolinc.vic.edu.au/bioregions/southern-volcanic-plain.

THE CITY OF
GREATER GEELONG

NORTHERN AND WESTERN GEELONG GROWTH AREAS

BIODIVERSITY CONSERVATION STRATEGY

APPENDIX A

JULY 2026

CITY OF GREATER GEELONG

Assessment against State planning and regulatory requirements for biodiversity

INTRODUCTION

This appendix provides responses to each of the specific requirements of:

- PPF Clause 12.01 'Biodiversity' from the Greater Geelong Planning Scheme
- Environmental Significance Overlay 4
- Section 4B of the *Flora and Fauna Guarantee Act 1988* (FFG Act) (the FFG Act 'biodiversity duty')

It draws on and refers to the more detailed descriptions for how the City has addressed considerations that are common across these key State planning and regulatory requirements for biodiversity.

PLANNING POLICY FRAMEWORK CLAUSE 12.01 'BIODIVERSITY'

The PPF is the policy content of planning schemes. The PPF provides context for spatial planning and decision-making by planning and responsible authorities. A planning policy includes objectives (a statement of what a policy seeks to achieve) and strategies (statements that outline how an objective is to be achieved). A planning policy may also include policy guidelines, which indicate how an objective can be met and how a strategy can be implemented.

A planning authority must take into account the PPF when preparing an amendment to a planning scheme. A responsible authority must take into account and give effect to the PPF when it makes a decision under the planning scheme, such as a decision to grant a permit for use or development.

CLAUSE 12.01-1S FROM THE GREATER GEELONG PLANNING SCHEME

Clause 12.01-1S – 'Protection of biodiversity' from the Greater Geelong Planning Scheme includes an objective to 'protect and enhance Victoria's biodiversity' and identifies a range of strategies to achieve this objective. The strategies are assessed in Table 1.

Table 1: Assessment against Clause 12.01-1S

Strategies	Response
Use biodiversity information to identify important areas of biodiversity, including key habitat for rare or threatened species and communities, and strategically valuable biodiversity sites	The BCS uses the best available biodiversity information to identify important areas of biodiversity and inform decisions to protect biodiversity within the Growth Areas (see Section 3.2 of the BCS). This information included: • Ecological surveys across the majority of the Growth Areas by Ecology and Heritage Partners (EHP, 2021), and Biosis (Biosis, 2024) • Species records obtained through the VBA (DELWP, 2025) • DELWP habitat and vegetation modelling (DELWP, 2005, 2017b) State and local biodiversity values will be further considered during precinct planning through the preparation of NVPPs and to meet any additional requirements of the Greater Geelong Planning Scheme.
Strategically plan for the protection and conservation of Victoria's important areas of biodiversity	The BCS is part of a strategic planning process undertaken by the City to identify areas for development and growth to meet economic, social and planning challenges and protect high biodiversity value areas (see Section 4.3.2 of the BCS). The strategic planning process for the Growth Areas involved several key steps that are consistent with the steps outlined in *Planning for biodiversity: guidance* (DELWP, 2017c). It has led to the avoidance of the most important biodiversity in the Growth Areas within strategic conservation areas. These are high biodiversity value areas that contain the most important national, State and local biodiversity values in the Growth Areas and are considered likely to be viable in the long-term because of their size, condition, shape and location in the landscape.

Strategies	Response

	Furthermore, the City's strategic approach to offsetting MNES under the EPBC Plan aims to protect and conserve important areas of biodiversity outside the Growth Areas and maximise the biodiversity benefits of offsetting MNES. This approach will also benefit State biodiversity values with habitat in the Growth Areas, including Golden Sun Moth and Striped Legless Lizard. This strategic approach to offsetting will be achieved through two key approaches:
	• Coordinated offset delivery within the NGGA. This is a key outcome of the strategic avoidance planning process, and provides in-situ protection and management of known biodiversity values, local to the areas impacted by development under the Plan
	• Spatially planned offsets. Offsets will meet at least one of the following strategic landscape criteria:
	  o Protection of Golden Sun Moth habitat areas that would be considered large for the species
	  o Located within a key biodiversity corridor and improves connectivity across the landscape
	  o Connection of the offset site to an existing conservation reserve
	The strategic delivery of offsets is described in the NWGGA Strategic Assessment Report (see Section 29.3).

Ensure that decision making takes into account the impacts of land use and development on Victoria's biodiversity, including consideration of:
1. Cumulative impacts
2. Fragmentation of habitat
3. The spread of pest plants, animals and pathogens into natural ecosystems
	The BCS was informed by a strategic assessment process that assessed the impacts of the development in the Growth Areas on MNES in the NWGGA Strategic Assessment Report and informed the development of the commitments and measures in the BCS to address these impacts. This included long and short-term impacts, direct and indirect impacts, and cumulative impacts. The NWGGA Strategic Assessment Report also considers potentially threatening processes including the fragmentation of habitat and the spread of pest plants and animals and pathogens. The overall beneficial and detrimental impacts of the development and BCS, taking into account the commitments and measures in the BCS to address these, are also evaluated.
	The impacts of the development on State biodiversity values, including cumulative impacts in the context of past native vegetation removal, will be assessed during precinct planning through the preparation of NVPPs and to meet any additional requirements of the Greater Geelong Planning Scheme.
	There is no guidance as to how cumulative impacts should be considered, including how cumulative impacts should be defined or the scale at which these impacts should be assessed. The City has therefore sought to meet these obligations relating to cumulative impacts in three different ways:
	• By meeting the cumulative impact requirements relating to past vegetation removal that are set out in the Native Vegetation Guidelines
	• In developing the BCS and implementing the strategic biodiversity planning steps at the Growth Area scale. By planning for biodiversity at this scale, as opposed to site or precinct scale planning, this process has delivered some of the key elements of cumulative impact assessments. Namely, understanding how biodiversity values are represented and distributed at a broader landscape scale in order to:
	  o Avoid and manage the most important and viable areas for long-term protection
	  o Identify corridors or linkages across the landscape
	  o Most appropriately focus development and impacts on the areas with the least biodiversity value
	• In undertaking a cumulative impact assessment as part of the strategic assessment under Part 10 of the EPBC Act. This assessment is presented in the Strategic Assessment Report and aimed to:

Strategies	Response
	○ Understand cumulative impacts and threatening processes to MNES in the Study Area, which included the NGGA, the northern two precincts in the WGGA, the bordering 'strategic assessment area' and the landscape within a 20 km radius of that area ○ Understand how development under the Plan may contribute to or exacerbate these threatening processes ○ Evaluate the adequacy of the EPBC Plan's proposed avoidance, mitigation, and offset commitments in relation to these threatening processes
Avoid impacts of land use and development on important areas of biodiversity	The BCS was informed by an avoidance planning process undertaken for the development within the Growth Areas to avoid and minimise impacts to biodiversity values (see Section 4.3). The BCS avoids and protects 'strategic conservation areas', which contain the most important national, State and local biodiversity values in the Growth Areas and are considered most likely to be viable in the long-term because of their size, condition, shape and location in the landscape.
Consider impacts of any change in land use or development that may affect the biodiversity value of national parks and conservation reserves or nationally and internationally significant sites; including wetlands and wetland wildlife habitat designated under the Convention on Wetlands of International Importance (the Ramsar Convention) and sites utilised by species listed under the Japan-Australia Migratory Birds Agreement (JAMBA), the China-Australia Migratory Birds Agreement (CAMBA), or the Republic of Korea-Australia Migratory Bird Agreement (ROKAMBA).	Three areas of the Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar site occur within the Study Area (Point Wilson/Limeburners Bay, Werribee/Avalon, and Lake Connewarre Complex). The potential impacts of the development on the ecological character of this site are assessed in Chapter 22 of the NWGGA Strategic Assessment Report and relate to: • Changes to water flows and quality • Disturbance from increased public access to natural areas The BCS includes commitments and measures that are expected to adequately manage the potential indirect impacts of the development on the Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar site. These include: • Continuing to implement standard mitigation measures to minimise the indirect impacts of the development in accordance with the requirements of the Greater Geelong Planning Scheme • Implementing specific mitigation measures to minimise the indirect impacts of the development on protected matters associated with waterways, riparian areas and wetlands including: ○ EPBC listed threatened and migratory birds ○ *Galaxiella toourtkoourt* (Little Galaxias) ○ *Ranoidea raniformis* (Growling Grass Frog) ○ *Nannoperca obscura* (Yarra Pygmy Perch) ○ *Prototroctes maraena* (Australian Grayling) ○ *Pseudemoia rawlinsoni* (Glossy Grass Skink) ○ *Lachnagrostis adamsonii* (Adamson's Blown-grass) ○ Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar site
Assist in the identification, protection and management of important areas of biodiversity	The strategic avoidance planning process for the Growth Areas was undertaken to identify the most important areas for biodiversity that are suitable for protection and management. This process involved two structured decision making (SDM) processes, one in 2022, and the second in 2024 (following the rediscovery of the Victorian Grassland Earless Dragon). The biodiversity values within the Growth Areas, including Striped Legless Lizard, Golden Sun Moth, Natural Temperate Grassland, and Victorian Grassland Earless Dragon, were one of the key considerations of this process. The outcome of these SDM processes is a layout of the Growth Areas which balances environmental, social and economic values. The key outcome of this SDM process was the addition

Strategies	Response
	of two Strategic Conservation Areas and one avoidance area in the NGGA, and one avoidance area in the WGGA. These areas will be protected and managed through the commitments and measures under the EPBC Plan and the BCS. Further details on this process can be found in Supporting Document C to the SAR.
Assist in the establishment, protection and re-establishment of links between important areas of biodiversity, including through a network of green spaces and large-scale native vegetation corridor projects	As described previously, the layout of the Growth Areas was identified through SDM processes (see Supporting Document C to the SAR). One of the key considerations in this process was how well areas of avoidance were connected (both within and outside the Growth Areas). Key outcomes for connectivity in the Growth Areas as part of this process include: • Delivery of the Northern Conservation Area, which connects to undeveloped areas to the north of the NGGA • Protection of the Cowies Creek Conservation Area, which protects a notable portion of Cowies Creek and may benefit the broader creek corridor • Protection of the Moorabool river corridor, which protects the extent of the Moorabool river within the WGGA, and will contribute to health of the broader river corridor In addition, the BCS identifies landscape connections, which are locations within the Growth Areas which may be suitable for less intensive use or development, such as open space or waterways, and where opportunities may exist for providing co-benefits for biodiversity through the infrastructure siting and design phase. Their primary purpose is not conservation. However, they may provide a contribution to biodiversity protection and enhancement where that is complementary to the primary purpose of the area.
Support land use and development that contributes to protecting and enhancing habitat for indigenous plants and animals in urban areas	Development under the Plan will support land use and development within the Geelong region. The strategic assessment has enabled a landscape scale assessment and approval of a suite of development actions under the EPBC Act. Delivery of the strategic assessment will include the establishment, protection, and management of four strategic conservation areas, and the avoidance of two avoidance areas within the Growth Areas. As described previously, identification of these areas was the result of an SDM process, which considered the location of native flora and fauna species within the Growth Areas. Delivery of these Strategic Conservation Areas and avoidance areas will provide for in-situ protection of biodiversity within / in proximity to the future urban areas of Geelong. Habitat within the Strategic Conservation Areas will be managed (and enhanced) through Conservation Management Plans, which will consider the key native flora and fauna to be protected in these areas. In the absence of the strategic assessment, the long-term future of this land would remain uncertain, particularly given the existing landscape threats within the Growth Areas. Delivery of the strategic assessment and associated development within the Growth Areas confirms and fully funds the long term protection and management of land within the Growth Areas through a biodiversity levy. Refer to the Funding Program for further information.

CLAUSE 12.01-1L

Clause 12.01-1L – 'Protection of biodiversity' includes a single strategy, and is assessed in Table 2.

Table 2: Assessment against Clause 12.01-1L

Strategy	Response
Ensure that land use and development enhances areas	The City has considered this PPF strategy in developing the BCS. The BCS establishes a set of outcomes and commitments and measures that will protect and

Strategy	Response
of native vegetation and other habitats	restore and enhance biodiversity and ecological processes. These are set out in the BCS and include the protection and management of the: • Northern Conservation Area • Eastern Conservation Area • Gully avoidance area • Cowies Creek Conservation Area • Moorabool river corridor • Moorabool avoidance area Together, these areas will protect: • The largest habitat area for Striped Legless Lizard in the NGGA • A substantial area of habitat for Golden Sun Moth in the NGGA • All high and moderate quality habitat and the vast majority of low quality habitat for Growling Grass Frog within the WGGA • Multiple other national, State and local biodiversity values • Areas of key habitat connectivity across the Growth Areas • Riparian areas that will help maintain ecological processes and water flows and quality

ESO4 – GRASSLANDS WITHIN THE WERRIBEE PLAINS HINTERLAND

Schedule 4 to clause 42.01 ESO 'Grasslands within the Werribee Plains Hinterland' is an overlay shown on the Greater Geelong planning scheme map as ESO4. The ESO was applied by the Victorian Government in 2010 through planning scheme amendment VC68. This was introduced to support the objectives of *Delivering Melbourne's Newest Sustainable Communities,* which included a review of Melbourne's urban growth boundary and the identification of four new growth areas for Melbourne, and the outcomes of the Melbourne Strategic Assessment conducted under Part 10 of the EPBC Act. Melbourne's new growth areas are resulting in impacts to native grasslands of the Victorian Volcanic Plain. ESO4 applies to areas of native grasslands and associated vegetation communities within the City of Greater Geelong and a similar control applies to several other local government areas on the volcanic plain to provide an additional level of protection to these areas. The ESO was intended to be revised within a few years on the basis of more detailed mapping of native grasslands across the Werribee Plains, to better target the ESO to the most important areas (DSE, 2009).

As part of the permit application process for use of development or to subdivide land, the ESO requires proponents to prepare a flora and fauna assessment for the land, including a flora and fauna survey and habitat hectare assessment, and a land and environmental management plan, including measures for revegetation, and weed and pest animal management.

The statement of environmental significance for ESO4 states the native vegetation of the Victorian Volcanic Plain is some of the most depleted vegetation in Victoria. The Werribee Plains hinterland, which is part of the volcanic plain, formerly supported extensive areas of native grasslands that integrated with other vegetation communities, including woodland communities in riparian areas. Although the vegetation has been extensively cleared, some large areas of native vegetation remain that are also important for several threatened species, including Spiny Rice-flower and Striped Legless Lizard. The Statement of environmental significance concludes:

> [Despite the loss and degradation of native vegetation] … *a range of conservation assets are present and significant opportunities exist to establish relatively large areas and networks of areas that are managed sympathetically for conservation. Such networks could include a range of vegetation types and land tenures and relatively large and intact areas of open grassland, grassy woodland and wetland communities.*

Development within the Growth Areas consistent with the biodiversity outcomes of the BCS would lead to the removal of native vegetation and habitat on some land within ESO4. This would comprise land that is not included in areas to be avoided and protected under the BCS through strategic conservation areas.

Despite the BCS leading to the removal of native vegetation and habitat within the ESO, the City considers the BCS is consistent with the environmental objectives of the ESO4 (see Table 3). The City also considers the BCS is likely to

improve outcomes for native grasslands compared to individual permit applications under the ESO4 requirements, as the detailed ecological assessment and avoid, minimise and offset requirements have been applied in a strategic planning context (see Table 3 and further discussion of the benefits of strategic planning in Section 4.3.2).

ESO4 is proposed to be removed from areas identified for urban development in the Framework Plan as part of the planning scheme amendment to implement the BCS and the outcomes from the EPBC Plan. The ESO4 will be retained on the land within the Northern and Eastern Conservation Areas to provide additional protection to these areas.

Table 3: Response against each environmental objective of ESO4

Objective of ESO4	Response

To prevent a decline in the extent and quality of native vegetation and native fauna habitat of the Victorian Volcanic Plain	The City considers that the BCS will ensure the development in the Growth Areas does not lead to a decline in the extent and quality of native vegetation and fauna habitat of the Victorian Volcanic Plain. This outcome is being achieved through:
	• Strategic planning – the BCS was developed as part of a strategic planning process (see Section 4.3.2). Strategic planning is the most effective planning process to protect and conserve biodiversity (DELWP, 2017c). The strategic planning process has led to the avoidance and protection of the most important biodiversity in the Growth Areas within the strategic conservation areas. These are high biodiversity value areas that contain important national, State and local biodiversity values and are considered likely to be viable in the long-term because of their size, condition, shape and location in the landscape. Strategic planning has also enabled a strategic approach to offsetting MNES under the EPBC Plan (see NWGGA Strategic Assessment Report Chapter 29.3), which aims to protect and conserve important areas of biodiversity outside the Growth Areas and maximise the biodiversity benefits of offsetting MNES. This approach will also benefit State biodiversity values with habitat in the Growth Areas, including Golden Sun Moth and Striped Legless Lizard. This strategic approach to offsetting will be achieved through two key approaches:
	  o Prioritising advanced offsetting, early in the life of the Plan
	  o Strategic site selection that focuses on large sites that are well located in the landscape from a biodiversity perspective. Priority will be given to offset sites that are larger and adjacent to and/or connected to other patches of habitat (including existing reserves) and that could form broad habitat corridors across the landscape
	• Assessing the impacts of the development on biodiversity values and understanding the implications of these impacts for the persistence of biodiversity values in the Growth Areas. For nationally listed matters, this was done through the NWGGA Strategic Assessment Report. For State and local biodiversity values, this will be done during precinct planning through the preparation of NVPPs and to meet any additional requirements of the Greater Geelong Planning Scheme. NVPPs will be prepared in accordance with Clause 52.16, including the Native Vegetation Guidelines (DELWP, 2017a)
	• Establishing a set of outcomes and commitments and measures in the BCS to address the impacts of the development on biodiversity values and the implications of these impacts for the persistence of biodiversity values
	The outcomes, commitments and measures will be monitored and adaptively improved if necessary over time to ensure they are achieved and that biodiversity values are protected in the long-term

To enhance the environmental and landscape values of the area	The City considers that the BCS will enhance the environmental and landscape values of the Geelong area. The BCS establishes a set of outcomes and commitments and measures that will protect and enhance biodiversity values and ecological processes within the landscape These include the protection and management of the strategic conservation areas within the Growth Areas. The primary purpose of these conservation areas is the protection, management and restoration of biodiversity values, including native

Objective of ESO4	Response
	grasslands and fauna habitat. Conservation Management Plans will be prepared and implemented for the areas that will include management actions to improve the condition of Natural Temperate Grassland and habitat for Striped Legless Lizard and Golden Sun Moth in the Northern Growth Area, and Growling Grass Frog along riparian corridors in the Western Growth Area The BCS also provides for a strategic approach to offsetting MNES under the EPBC Plan (see NWGGA Strategic Assessment Report Chapter 29.3). This approach will also benefit State biodiversity values with habitat in the Growth Areas, including Golden Sun Moth and Striped Legless Lizard. This approach improves the outcomes of offsetting and ensures the BCS contributes to this ESO objective of enhancing the landscape values of the area
To avoid the fragmentation of contiguous areas of native vegetation or native fauna habitat	The City considers the BCS avoids fragmentation of the most important areas of native vegetation and fauna habitat in the Growth Areas. The BCS was informed by an avoidance planning process undertaken for the development within the Growth Areas to avoid and minimise impacts to biodiversity values (see Section 4.3). The BCS will protect and manage strategic conservation areas, which contain the most important national, State and local biodiversity values in the Growth Areas and are considered most likely to be viable in the long-term because of their size, condition, shape and location in the landscape The strategic conservation areas will avoid and protect: • The largest habitat area for Striped Legless Lizard in the NGGA • A substantial area of habitat for Golden Sun Moth in the NGGA • Multiple other national, State and local biodiversity values • Areas of key habitat connectivity across the Growth Areas The BCS identifies several further opportunities to avoid and minimise impacts on biodiversity values in the Growth Areas within biodiversity opportunity areas and investigation areas. Opportunities for further avoidance and minimisation within these areas will be considered further during precinct planning through the preparation of NVPPs and to meet any additional requirements of the Greater Geelong Planning Scheme. The BCS includes commitments and measures to consider further avoidance within these areas, and identifies through precinct profiles the opportunities and priorities that should be considered in making decisions on further avoidance of these areas during precinct planning The BCS also includes commitments and measures to minimise the impacts of the development on surrounding native vegetation and other biodiversity values, including requirements to implement: • Standard mitigation measures delivered through the planning system • Additional specific mitigation measures to address key biodiversity values associated with waterways, riparian areas and wetlands, and to protect the strategic conservation areas • Requirements to prepare and implement conservation management plans for each of the strategic conservation areas
To ensure that any use, development or management of the land is compatible with the long-term conservation, maintenance and enhancement of the grasslands	The City considers that the BCS will ensure the development in the Growth Areas is compatible with long-term conservation and enhancement of native grasslands. This outcome is being achieved through the key processes identified above in the response to the first ESO objective
To avoid the destruction of habitat for native fauna resulting from the modification	The City considers that the BCS avoids and minimises impacts to the most important areas of native fauna in the Growth Areas within the four strategic conservation areas (see response to the third ESO objective above). It also identifies

Objective of ESO4	Response
of land form and disturbance of surface soils and rocks	several further opportunities to avoid and minimise impacts on native vegetation in biodiversity opportunity areas and investigation areas
To enable areas of environmental significance, due to their native vegetation or habitat values, to be identified	The City considers that the BCS uses the best available biodiversity information to identify important areas of native grasslands and associated vegetation communities that are the focus of protection under the ESO (see Section 3.2). This information included: • Ecological surveys across the majority of the Growth Areas by Ecology and Heritage Partners (EHP, 2021) • Species records obtained through the VBA (DELWP, 2025) • DELWP habitat and vegetation modelling (DELWP, 2005, 2017b) State and local biodiversity values will be further considered during precinct planning. This includes through the preparation of NVPPs and any additional requirements of the Greater Geelong Planning Scheme NVPPs will be prepared in accordance with the requirements of Clause 52.16 and the Native Vegetation Guidelines, which specify the biodiversity information required to prepare these plans

FFG ACT 'BIODIVERSITY DUTY'

The FFG Act imposes a duty on public authorities to 'give proper consideration to' the Act's objectives in performing any of their functions that may impact on biodiversity, as well as consider several other additional matters. The intent of the duty is to:

- Strengthen government leadership and accountability for biodiversity outcomes in Victoria (Parliament of Victoria, 2018), which is a key theme of *Protecting Victoria's Environment – Biodiversity 2037* (DELWP, 2017d)
- Ensure whole-of-government consideration of biodiversity in decision-making (Parliament of Victoria, 2018)
- Support regulatory frameworks for assessing and minimising impacts to biodiversity by encouraging early consideration of biodiversity in decision making, before regulatory approval is required (DELWP, 2021)

The new duty came into effect on 1 June 2020 and applies to all levels of the Victorian Government, including an administrative office, government department, council, public entity and state-owned enterprises.

The duty applies to the City of Greater Geelong in relation to the development of the BCS as there is a reasonable expectation that the carrying out of this function may impact biodiversity. It is important to note that:

- Meeting the duty requires the City to give 'proper consideration' to the Act's objectives and several other matters rather than mandating specific outcomes that the City must achieve for biodiversity
- The City is required to comply with the duty in a manner which is consistent with the proper exercise of its functions under any other Act. The duty does not override the City's other statutory obligations. The duty does not prevent the City from exercising its statutory powers and discretion to weigh biodiversity matters against other matters it is required to consider when making decisions, such as social or economic objectives under the *Planning and Environment Act 1987*

The FFG Act provides that the Minister may make guidelines in relation to the proper consideration of the Act's objectives and help define what is reasonably expected under the duty. No guidelines have currently been made.

Table 4 provides an assessment against the FFG Act 'biodiversity duty'.

Table 4: Assessment against the FFG Act 'biodiversity duty'

Section	Response
4B (1) A Minister and a public authority must give proper consideration to the objectives of this Act, so far as is	-

Section	Response
consistent with the proper exercising of their functions The objectives of this Act are—	
(a) To guarantee that all taxa of Victoria's flora and fauna, other than taxa specified in the Excluded List, can persist and improve in the wild and retain their capacity to adapt to environmental change	The City has given proper consideration to this objective in developing the BCS. This has been done through: • Strategic planning – the BCS was developed as part of a strategic planning process (see Section 4.3.2 of the BCS). Strategic planning is the most effective planning process to protect and conserve biodiversity (DELWP, 2017c). The strategic planning process has led to the avoidance and protection of the most important biodiversity in the Growth Areas within four strategic conservation areas. These are high biodiversity value areas that contain important national, State and local biodiversity values and are considered likely to be viable in the long-term because of their size, condition, shape and location in the landscape, including their connectedness to other areas of native vegetation and habitat. Strategic planning has also enabled a strategic approach to offsetting MNES under the EPBC Plan (see NWGGA Strategic Assessment Report Chapter 29.3), which aims to protect and conserve important areas of biodiversity outside the Growth Areas and maximise the biodiversity benefits of offsetting MNES. This approach will also benefit State biodiversity values with habitat in the Growth Areas, including Golden Sun Moth and Striped Legless Lizard • Assessing the impacts of the development on biodiversity values and understanding the implications of these impacts for the persistence of biodiversity values in the Growth Areas. For nationally listed matters, this was done through the NWGGA Strategic Assessment Report. For State and local biodiversity values, this will be done during precinct planning through the preparation of NVPPs and to meet any additional requirements of the Greater Geelong Planning Scheme. NVPPs will be prepared in accordance with Clause 52.16, including the Native Vegetation Guidelines (DELWP, 2017a) • Establishing a set of outcomes and commitments and measures in the BCS to address the impacts of the development on biodiversity values and the implications of these impacts for the persistence of biodiversity values For nationally listed matters impacted by the development, the outcomes and commitments aim to ensure that these persist within the Growth Areas and their long-term viability will be supported, and that matters associated with waterways, riparian areas, and wetlands are protected from any notable adverse impacts. Unavoidable impacts on nationally listed matters will be offset outside the Growth Areas. The outcome for these offsets in the BCS is that they will make an important contribution to the recovery efforts for these matters. For State and local biodiversity values, the outcomes and commitments are designed to ensure no net loss to biodiversity because of the removal of native vegetation. This is consistent with the objectives of State planning policy set out in the PPF and this FFG Act objective. The outcomes, commitments and measures will be monitored and adaptively improved if necessary over time to ensure they are achieved and that biodiversity values are protected in the long-term.
(b) To prevent taxa and communities of flora and fauna from becoming threatened and to recover threatened taxa and communities so their conservation status improves	The City has given proper consideration to this objective in developing the BCS through the steps outlined above in relation to FFG Act objective (a), including strategic planning, assessing impacts and establishing a set of outcomes and commitments and measures to address the impacts of the development on biodiversity values. For State and local biodiversity values, the outcomes and commitments are designed to ensure no net loss to biodiversity because of the removal of native vegetation. This is consistent with the objectives of State planning policy set out in the PPF and this FFG Act objective.

Section	Response
	Unavoidable impacts on nationally listed matters will be offset outside the Growth Areas. The outcome for these offsets in the BCS is that they will make an important contribution to the recovery efforts for these matters consistent with this FFG Act objective to recover threatened species and communities so their status improves.
(c) To protect, conserve, restore and enhance biodiversity, including— ○ flora and fauna and their habitats ○ genetic diversity ○ ecological communities ○ ecological processes	The City has given proper consideration to this objective in developing the BCS by establishing a set of outcomes and commitments and measures that will protect and restore and enhance biodiversity and ecological processes. These are set out in the BCS and include the protection and management of the: • Northern Conservation Area • Eastern Conservation Area • Gully avoidance area • Cowies Creek Conservation Area • Moorabool River corridor • Moorabool avoidance area Together, these areas will protect: • The largest habitat area for Striped Legless Lizard in the NGGA • A substantial area of habitat for Golden Sun Moth in the NGGA • All high and moderate quality habitat and the vast majority of low quality habitat for Growling Grass Frog within the WGGA • Multiple other national, State and local biodiversity values • Areas of key habitat connectivity across the Growth Areas • Riparian areas that will help maintain ecological processes and water flows and quality
(d) To identify and mitigate the impacts of potentially threatening processes to address the important underlying causes of biodiversity decline	The City has given proper consideration to this objective in developing the BCS by identifying potentially threatening processes that may cause biodiversity decline and putting in place a set of commitments and mitigation measures to address these. The threatening processes that are impacting biodiversity values within and surrounding the Growth Areas are identified in the BCS (see Chapter 4.3), and are: • Climate change • Habitat loss and fragmentation • Invasive weeds • Pest animals • Recreational disturbance • Water system modification These relate to several potentially threatening processes listed under the FFG Act. The BCS recognises that the effective management of threatening processes is critical to its successful delivery. The City has made a range of commitments to reduce these threats, including: • Continuing to implement standard mitigation measures to minimise the indirect impacts of the development in accordance with the requirements of the Greater Geelong Planning Scheme • Implementing specific mitigation measures to minimise the indirect impacts of the development on biodiversity values associated with waterways, riparian areas and wetlands

Section	Response
	• Implementing specific mitigation measures to minimise the indirect impacts of the development on the Northern Conservation Area, Eastern Conservation Area and Cowies Creek Conservation Area These commitments are set out in the BCS.
(e) To ensure the use of biodiversity as a natural resource is ecologically sustainable	This objective is not relevant to the BCS – the BCS is not facilitating the use of biodiversity as a natural resource.
(f) To identify and conserve areas of Victoria in respect of which critical habitat determinations are made	This objective is not relevant to the BCS – no critical habitat determinations are currently made under the FFG Act
4B (2) A Minister and a public authority, so far as is consistent with the proper exercising of their functions, must give proper consideration to any instrument made under this Act, including—	-

Protecting Victoria's Environment – Biodiversity 2037 (DELWP, 2017d)	The City has given proper consideration to *Protecting Victoria's Environment – Biodiversity 2037* (DELWP, 2017d) in developing the BCS. This strategy establishes a long-term vision, and goals, targets and priorities. The overall statewide targets for the goal 'Victoria's natural environment is healthy' include:
	• A net improvement in the outlook across all species by 2037, so that:
	  ○ No vulnerable or near-threatened species will become endangered
	  ○ All critically endangered/endangered species will have at least one option available for being conserved ex situ or re-established in the wild (where feasible under climate change) should they need it
	• A net gain of the overall extent and condition of habitats across terrestrial, waterway and marine environments
	Contributing targets in *Protecting Victoria's Environment* that are expected to help achieve these overall statewide targets are:
	• 1.5 million ha of pest predator control and 1.5 million ha of weed control in priority locations sustained for 20 years
	• 4 million ha of pest herbivore control in priority locations for 20 years
	• 200,000 ha of revegetation in priority locations for habitat connectivity by 2037 (an average of 10,000 ha per year)
	Priority locations are the areas across Victoria where management actions maximise benefits to threatened and other species. The Growth Areas includes priority locations for the management of several threats, including:
	• Pest herbivore control
	• Weed control
	• Revegetation
	The BCS includes commitments and measures consistent with these goals and targets. This includes the protection and management of the Northern Conservation Area, Eastern Conservation Area, Gully Avoidance Area, Cowies Creek Conservation Area, Moorabool River corridor and Moorabool avoidance area. The Northern Conservation Area overlaps with a priority location for revegetation, and the Moorabool River corridor overlaps with priority locations for revegetation, pest herbivore and weed control.

Section	Response
Action Statements	Action Statements have been prepared for four State-listed species known to occur (as indicated by records or mapped confirmed habitat) in the Growth Areas. These are: • Golden Sun Moth • Striped Legless Lizard • Adamson's Blown-grass • Growling Grass Frog The EHP report (EHP, 2021) identified several other State-listed species with a high likelihood of occurrence in the Growth Areas, however, none of these species have Action Statements prepared for them. The City has given proper consideration to these Action Statements in developing the BCS. The City considers that the commitments in the BCS to address the impacts of the development in the Growth Areas are consistent with the conservation objectives of the Actions Statements and will not undermine or prevent the achievement of these objectives. **Golden Sun Moth** The major conservation objective of the Action Statement (DSE, 2004) is to protect known populations of Golden Sun Moth by: • Maintaining the seven extant colonies with greater than 500 individuals • Increasing the number of known populations • Maximising grassland habitat at the seven sites • Protecting and enhancing suitable habitat areas to ensure that the percentage cover of *Austrodanthonia* is greater than 40 per cent Note that information in the Action Statement is outdated and the species is now known from 164 sites (DAWE, 2021). Of these, 104 sites occur in Victoria. The EPBC Strategic Assessment Report assessed the impacts of development in the Growth Areas on Golden Sun Moth and concluded that the commitments in the EPBC Plan and BCS relating to the avoidance and offsetting of impacts to habitat for the species are expected to maintain a viable population for the species in both the local area and more broadly through the protection and management of strategic offsets. This will be delivered through: • The management and restoration of habitat values within the Northern Conservation Area to the point where habitat condition, and therefore the viability of the population improves, and the area is regarded as important to the conservation of the species in the region. In the absence of urban development within the NGGA, the condition of the grassland habitat in the Growth Area is likely to continue to decline and the probability of the NGGA Golden Sun Moth population persisting over the long-term is uncertain • The delivery of strategic offsets external to the Growth Areas, which will identify, protect and manage higher quality areas of Golden Sun Moth habitat that are likely to be important to maintaining the long-term presence of the species across its range into the future These commitments in the EPBC Plan and BCS to address the impacts of the development in the Growth Areas are considered to be consistent with the conservation objectives of the Action Statement. Further information justifying this conclusion and the adequacy of the commitments for Golden Sun Moth is provided in Part 4 of the EPBC Strategic Assessment Report. **Striped Legless Lizard** The major conservation objective of the Action Statement (DSE, 2003) is to: • Ensure the Striped Legless Lizard can survive, flourish and maintain its potential for evolutionary development in the wild

Section	Response
	The interim target is to: • Maintain or establish a minimum of five areas of suitable habitat where threats to the species are removed or minimised, with each area supporting a viable population, and the total population being not less than 1000 individuals The EPBC Strategic Assessment Report assessed the impacts of development in the Growth Areas on Striped Legless Lizard and concluded that the commitments in the EPBC Plan and BCS will avoid and protect the largest area of confirmed habitat for Striped Legless Lizard in the Growth Areas within the Northern Conservation Area, which will provide for the long-term persistence of the local population. Furthermore, the management of this area will support population recovery by improving connectivity to enable the species to colonise areas of habitat in the conservation area where the species has not yet been recorded. While development under the Plan will lead to the loss of the remaining two populations in the Growth Areas, the habitat condition and viability of these areas is more marginal compared with the area to be avoided and protected. Despite this, these populations are considered important and their loss will lead to a residual adverse impact on the species. The EPBC Plan and BCS includes commitments to offset this residual impact, including: • Protection and ongoing management of 50.5 ha of Striped Legless Lizard habitat within the Northern Conservation Area • Protection and ongoing management of 291.5 ha of Striped Legless Lizard habitat outside the Growth Areas These offsets will be delivered strategically and will make an important and positive contribution to the long-term viability of the species and is considered to appropriately compensate for the residual impacts of development These commitments in the EPBC Plan and BCS to address the impacts of the development in the Growth Areas are considered to be consistent with the conservation objectives of the Action Statement. Further information justifying this conclusion and the adequacy of the commitments for Striped Legless Lizard is provided in Part 4 of the EPBC Strategic Assessment Report **Adamson's Blown-grass** The key objectives of the Action Statement (DEECA, 2023a) are to: • Mitigate threats to populations and habitat to increase resilience, genetic diversity and minimise future population decline • Increase knowledge of the ecology, distribution, demography, emerging threats, and conservation requirements of Adamson's Blown-grass • Support community participation and improve awareness of the Adamson's Blown-grass and threats to the species The EPBC Strategic Assessment Report assessed the impacts of development in the Growth Areas on Adamson's Blown-grass and concluded that development in the Growth Areas is unlikely to adversely influence the long-term viability of the species. The development will not impact the species directly and the EPBC Plan and BCS includes several commitments to protect the species from any potential impacts from changes in hydrology or the spread of weeds within marginal potential habitat along Cowies Creek in the WGGA. These commitments include protecting and managing the Cowies Creek Conservation Area, including managing potential habitat for Adamson's Blown-grass within this area to maintain the suitability of the habitat in the long-term. This will positively contribute to the protection of the species in the region. These commitments in the EPBC Plan and BCS to address the impacts of the development in the Growth Areas are considered to be consistent with the conservation objectives of the Action Statement. Further information justifying this

Section	Response
	conclusion and the adequacy of the commitments for Adamson's Blown-grass is provided in Part 4 of the EPBC Strategic Assessment Report. **Growling Grass Frog** The objectives of the Action Statement are to (DEECA, 2023b): • Mitigate threats to populations and habitat to increase resilience, increase genetic fitness and minimise future population decline • Increase the Growling Grass Frog's range and/or extent by providing opportunities for natural movement where possible • Increase knowledge of biology, ecology, distribution, demography, emerging threats, and conservation requirements • Support community participation and improve awareness of the Growling Grass Frog and conservation of its habitat The EPBC Strategic Assessment Report assessed the impacts of development in the Growth Areas on Growling Grass Frog and concluded that residual adverse impacts to the species are unlikely. In addition, the EPBC Plan and BCS includes several commitments to protect the species from potential indirect impacts within Cowies Creek from changes in hydrology, fragmentation of populations, or introduced cats. These commitments include protecting and managing the Cowies Creek Conservation Area to avoid and protect habitat needed to support the continued persistence of the Growling Grass Frog. The conservation area will also lead to a significant area of habitat being restored and managed. This will positively contribute to the protection of the species in the region. These commitments in the EPBC Plan and BCS to address the impacts of the development in the Growth Areas are considered to be consistent with the conservation objectives of the Action Statement. Further information justifying this conclusion and the adequacy of the commitments for Growling Grass Frog is provided in Part 4 of the EPBC Strategic Assessment Report.
Critical habitat determinations	No critical habitat determinations have been made under the FFG Act.
Management plans	No management plans have been made under the FFG Act.
4B (3) Without limiting subsections (1) and (2), consideration must be given to the potential impacts on biodiversity, including—	-
(a) Long and short-term impacts; and (b) Beneficial and detrimental impacts; and (c) Direct and indirect impacts; and (d) Cumulative impacts; and (e) Impacts of potentially threatening processes	The City has given proper consideration to the potential impacts of the development in the Growth Areas in developing the BCS consistent with this requirement and in accordance with Commonwealth and State regulatory requirements for assessing biodiversity impacts. For nationally listed matters, this assessment was done through the NWGGA Strategic Assessment Report. The NWGGA Strategic Assessment Report assesses long and short-term impacts and direct and indirect impacts, and considers potentially threatening processes (see Chapters 19 to 24) and cumulative impacts (see Chapter 25). The overall beneficial and detrimental impacts, taking into account the commitments and measures to be put in place to address impacts, are also evaluated (see Chapter 29). For State and local biodiversity values, this assessment, including cumulative impacts in the context of past native vegetation removal, will be done during precinct planning through the preparation of NVPPs and to meet any additional requirements of the Greater Geelong Planning Scheme. NVPPs will be prepared in accordance with Clause 52.16, including the Native Vegetation Guidelines (DELWP, 2017a).

Section	Response
4) The Minister may make guidelines in relation to the proper consideration of the objectives of this Act and the instruments made under it by public authorities.	No guidelines have been made under the FFG Act.

References

Biosis (2024) 'Victorian Grassland Earless Dragon, targeted surveys, and habitat suitability assessment - Geelong Growth Areas'.

DAWE (2021) 'Conservation Advice for *Synemon plana* (Golden Sun Moth)', *2021* [Preprint]. Department of Agriculture, Water and the Environment.

DEECA (2023a) *Action statement Adamson's Blown-grass (Lachnagrostis adamsonii)*.

DEECA (2023b) *Action statement Growling Grass Frog (Litoria raniformis) Conservation Status*.

DELWP (2005) 'Native Vegetation - Modelled 2005 Ecological Vegetation Classes (with Bioregional Conservation Status)'. Department of Environment, Land, Water and Planning.

DELWP (2017a) 'Guidelines for the removal, destruction or lopping of native vegetation'.

DELWP (2017b) 'Habitat Importance Models'. Department of Environment, Land, Water and Planning.

DELWP (2017c) 'Planning for biodiversity: guidance'.

DELWP (2017d) 'Protecting Victoria's Environment – Biodiversity 2037'.

DELWP (2021) 'Flora and Fauna Guarantee Act 1988 Public authority duty'.

DELWP (2025) 'Victorian Biodiversity Atlas'. Department of Environment, Land, Water and Planning. Available at: https://www.environment.vic.gov.au/biodiversity/victorian-biodiversity-atlas.

DSE (2003) 'Action Statement Flora and Fauna Guarantee Act 1988 Striped Legless Lizard'.

DSE (2004) 'Action Statement Flora and Fauna Guarantee Act 1988 Golden Sun Moth'.

DSE (2009) *Delivering Melbourne's Newest Sustainable Communities: Strategic Impact Assessment Report*.

EHP (2021) 'Existing Ecological Conditions: Northern and Western Geelong Growth Areas'. Prepared for the City of Greater Geelong.

Parliament of Victoria (2018) '2nd Reading Speech Flora and Fauna Guarantee Amendment Bill', p. p 1608.

THE CITY OF
GREATER GEELONG

NORTHERN AND WESTERN GEELONG GROWTH AREAS

STRATEGIC ASSESSMENT FUNDING PROGRAM

July 2026

CITY OF GREATER GEELONG

Contents

1. Introduction 3

Report Structure 3

2. Conservation commitments and measures 4

Conservation commitments and measures 5

3. Calculation of contributions 8

EPBC approval 8

Biodiversity levy area 8

Project costs 12

Biodiversity Levy 16

4. Administration and Implementation 17

Implementation under the EPBC ACT and coordination with the Victorian planning system 17

Timing for payment of levy liability 21

Works-in-kind, land in kind and offsets 22

Credit for over provision 22

Credit for early provision 22

Funds administration 22

Indexation 23

Review period 23

Monitoring impacts 24

Appendices 25

Appendix 1: project Costs - sources and assumptions 26

Appendix 2: External Offset Information 32

Appendix 3: Land Budget by PSP 39

List of Figures

Figure 1: Relationship of Strategic Assessment components 4

Figure 2: General plan of biodiversity levy area 9

List of Tables

Table 1: Conservation commitments and measures funded by the Levy 5

Table 2: Share of costs to be applied per Precinct 11

Table 3: Northern Growth Area project costs 12

Table 4: Western Growth Area project costs 14

Table 5: Estimated Western Growth Area Levy by precinct (levy subject to change as PSPs approved & costs updated) 16

Table 6: Estimated Northern Growth Area Levy by precinct (levy subject to change as PSPs approved & costs updated) 16

1. Introduction

The Northern and Western Geelong Growth Areas Strategic Assessment Funding Program (Funding Program) and resulting Biodiversity Levy (Levy) has been prepared by the City of Greater Geelong.

The Funding Program:

- Outlines the conservation land, offsets, resources, documentation and works that are required to give effect to the commitments of the endorsed *Environment Protection and Biodiversity Conservation Plan* (EPBC Plan or Plan), associated *Commitments and Measures* and *Biodiversity Conservation Strategy*.
- Directly responds to Commitment No. 24in the Plan, by establishing the arrangements to fund the implementation of the Plan's commitments and measures over the life of the Plan (30 years).
- Sets out a detailed framework within which development proponents will be required to make a financial contribution towards the recovery of costs associated with the implementation of the Plan's conservation commitments and measures throughout the life of the Plan, or alternatively provide land, works or offsets which the approval holder accepts in lieu of the obligation to make a financial contribution.
- Directly responds to Commitment No. 16 in the Plan, by enabling the approval holder to request that a development proponent provide offsets in lieu of a financial contribution, to ensure that offset delivery occurs ahead of impacts within the Northern Geelong Growth Area.
- Ensures the costs of delivering the Plan's conservation commitments to protect matters of national environmental significance (MNES) are shared equitably between development proponents.
- Provides certainty about how the Levy will be administered.

The City of Greater Geelong (the City) is the approval holder for the Plan. As approval holder, the City is responsible for:

- Ensuring the Plan's outcomes are achieved and implementing the commitments and measures
- Ensuring regulated third-parties who undertake an approved action or any part of an approved action under the endorsed Plan take these actions in accordance with the Plan and implementation documents and with the Commonwealth approval conditions
- Taking reasonable steps to ensure regulated third-parties:
  - Are informed of any relevant requirements of the endorsed Plan and Commonwealth approval conditions that regulates or restricts the way in which the action is taken
  - Comply with the endorsed Plan and Commonwealth approval conditions
- Notifying the National Environment Protection Authority (National EPA) of any known non-compliances with conditions by third parties

REPORT STRUCTURE

The Funding Program comprises:

- Conservation commitments
- Calculating the contribution
- Administration and Implementation
- Appendices

2. Conservation commitments and measures

The strategic basis for the funding framework and this program is outlined in the Northern and Western Geelong Growth Areas (NWGGA) Strategic Assessment. The EPBC Plan outlines objectives, outcomes, commitments and measures to manage impacts to MNES. The relationship of the components and the documents is shown in Figure 1.

The commitments and measures in the Plan to protect MNES that are funded projects over the life of the Plan are outlined in Table 1.

The scope of the projects are detailed in Appendix 1.

The Funding Program uses a project identification system of project category and sequential number in its tables and plans.

The following types of projects are included in the Funding Program:

- Offsets - OF
  - Golden Sun Moth - GSM
  - Striped Legless Lizard – SLL
  - Natural Temperate Grasslands of the Victorian Volcanic Plains – NTG
- Conservation Areas – CA
  - Land – L
  - Conservation works - CW
- Plan implementation and governance - PI
  - Finance costs – F
  - Plan preparation costs – PC
  - Compliance – C
  - MERI Framework – M

The Funding Program does not include infrastructure items associated with a typical growth area that are delivered by a proponent or funded through a Development Contributions Plan (DCP) or Infrastructure Contributions Plan such as roads, community centres or drainage. A separate DCP will apply to each precinct subject to the Funding Program.

The Funding Program does not include amenity upgrades associated with the Cowies Creek and Moorabool River corridors. These amenities such as toilet blocks and shared paths will be funded through the requisite DCP for the Precinct Structure Plan (PSP) area. The riparian corridors for the Moorabool River and Cowies Creek are not included as land items in the Funding Program. These corridors are encumbered land, unsuitable for development and will be vested as part of the subdivision of the adjacent land as part of the progress of development.

Figure 1: Relationship of Strategic Assessment components

Components of the outcomes and funding framework	Description of each component	Where each component is presented
Objectives	The broad contribution to be achieved by implementing the EPBC Plan	EPBC Plan
Outcomes	The positive impacts or changes which will achieve the overall objectives	EPBC Plan
Commitments	The direct results of implementing the measures which will achieve the outcomes	EPBC Plan, BCS, Commitments and Measures
Measures	The specific actions that will be undertaken to meet the commitments	Commitments and Measures
Funded Projects	The projects to be funded to deliver the measures	Funding Program

CONSERVATION COMMITMENTS AND MEASURES

Table 1: Conservation commitments and measures funded by the Levy

Commitment	Description	ID	Projects
Conservation Areas			
Northern Conservation Area	The Northern Conservation Area (NCA) will be established to protect and manage native vegetation and 50.5 ha of habitat for Striped Legless Lizard and 82ha of habitat for Golden Sun Moth and 81ha of habitat potentially important for the recovery of Victorian Grassland Earless Dragon in perpetuity (Commitment 4 and 5)	NG_CA_L_1	165 Staceys Road as conservation land
		NG_CA_L_2	195 Staceys Road as conservation land
		NG_CA_L_3	Part of 225 Staceys Road as conservation land
		NG_CA_L_4	Part of 135 Staceys Road as conservation land
		NG_CA_CW_1	Conservation contractors and works (NCA) 0-10 year period
Eastern Conservation Area	The Eastern Conservation Area (ECA) will be established in perpetuity to avoid and protect 5.5 ha of habitat for Natural Temperate Grassland (Commitment 6, 7)	NG_CA_L_5	Part 295-335 Elcho Road as conservation land – Eastern Conservation Area (ECA)
		NG_CA_CW_2	Conservation contractors and works (ECA) 0-10 year period
Gully Avoidance Area	The gully avoidance area will avoid 3.5 ha of habitat for Striped Legless Lizard, 7ha of habitat for Golden Sun Moth and 2.5 ha of Natural Temperate Grassland (Commitment 8)	NG_CA_CW_3	Conservation contractors & works (Gully area) 0-10 years
All Northern Growth Area Conservation Areas		NG_CA_CW_4	Conservation maintenance costs 10-30 year period
		SH_CA_CW_5	Conservation staff (0.89EFT)
Cowies Creek Conservation Area	Managing the Cowies Creek Conservation Area as avoided land (Commitments 9, 10 and 11)	WG_CA_CW_1	Landscape contractors and works (Cowies Creek) 0-10 years

Commitment	Description	ID	Projects
		WG_CA_CW_2	Conservation contractors and works (Cowies Creek) 0-10 years
		WG_CA_CW_3	Growling Grass Frog Wetland 20 Evans Road, Bell Post Hill
		WG_CA_CW_4	Growling Grass Frog Wetland No.1 30-35 Avonlea Road, Bell Post Hill
		WG_CA_CW_5	Growling Grass Frog Wetland No.2 30-35 Avonlea Road, Bell Post Hill
		WG_CA_CW_6	Growling Grass Frog Wetland 299 Anakie Road, Lovely Banks
		WG_CA_CW_7	Cultural Heritage Advice – across all wetlands
		WG_CA_CW_8	Conservation maintenance costs (Cowies Creek) 10-30 years
		SH_CA_CW_9	Conservation staff (0.11 EFT)
External Offsets			
Securing offsets	Offset sites will be established to meet specified targets. (Commitment 16)	NG_OF_1_NTG	15.5 ha of Natural Temperate Grassland
		NG_OF_2_SLL	291.5 ha of habitat for Striped Legless Lizard
		NG_OF_3_GSM	424 ha of habitat for Golden Sun Moth
		NG_OF_4_BR	External offsets advice and brokerage cost
		NG_OF_5_VGED	Victorian Grassland Earless Dragon
Waterways			
	Specific mitigation measures will be implemented to minimise the indirect impacts of the development on MNES associated with waterways, riparian areas and wetlands. (Commitment 14,15)		To be confirmed at PSP stage
Plan implementation and governance			
Monitoring, evaluation, reporting and improvement (MERI) program	Implementation of the Plan's MERI framework over the life of the Plan (Commitment 24)	SH_PI_M_1	MERI framework development and implementation
		SH_PI_M_2	Project management and administration costs (1 EFT)

Commitment	Description	ID	Projects
Compliance	Implementation of the Plan's compliance framework over the life of the Plan (Commitment 26)	SH_PI_C_1	Compliance and education costs (1 EFT)
Plan preparation costs	Preparation of the Plan, BCS and SAR	SH_PI_PP_1	
	Technical studies to determine how avoid and mitigate potential downstream impacts as precincts are planned and developed (Commitment 15)	NG_PI_PP_2	Technical study for Hovells Creek
		WG_PI_PP_2	Technical study for Moorabool River
	Preparation of the conservation management plans for conservation areas (Commitment 5 and 4)	NG_PI_PP_4	Conservation management plan for Northern Conservation Reserve
		WG_PI_PP_5	Conservation management plan for Cowies Creek Conservation Reserve
		NG_PI_PP_6	Preparation of Conservation management plan for Eastern Conservation Reserve
Finance costs	Costs associated with securing of the offsets package early during Plan implementation to ensure that the biodiversity benefits of protecting and managing MNES are realised as far in advance of impacts as possible (Commitment 13)	NG_PI_F_1	Finance costs
		NG_PI_F_2	Compensation Costs (Land Acquisition)

3. Calculation of contributions

EPBC APPROVAL

The Plan has been prepared to meet the requirements of the *Environment Protection and Biodiversity Conservation Act 1999*. Following endorsement and associated approvals under the EPBC Act, the Plan enables the development that is described in Chapter 4 of the Plan to proceed.

The City is the approval holder for the Plan. As approval holder, the City has primary responsibility for implementing the Plan and ensuring the Plan's outcomes are achieved and its commitments are delivered.

The City is also responsible for ensuring third-parties who undertake an approved action under the endorsed Plan take these actions in accordance with the requirements of the Plan. The legislative framework also requires that third parties undertake relevant classes of action in accordance with the Plan.

Development is approved under Part 10 of the EPBC Act through 'classes of actions' that represent the scope of development that may be undertaken in accordance with the Plan.

There are five classes of actions that are included in the Plan:

- Urban and commercial development
- Industrial development
- Rural development
- Supporting infrastructure and services
- Environmental management

These classes of actions are outlined in Chapter 4 of the Plan.

Any person can undertake development within the Plan area and access the associated approval under Part 10 of the EPBC Act provided the following requirements are met:

- Development must fall within the classes of actions as defined in the Plan;
- Development must only occur within the development land as defined the Plan;
- Development must proceed in accordance with any Commonwealth conditions of approval;
- Development must proceed generally in accordance with the Plan, including the avoidance and minimisation, mitigation and offset requirements of the Plan;
- Developers must pay the biodiversity Levy outlined in this Funding Program; and
- Development must be registered in accordance with the developer registration system.

The provisions of the EPBC Act and the endorsed Plan provide the legal basis for the collection of the biodiversity levy and the implementation of the developer registration system in accordance with this Funding Program.

BIODIVERSITY LEVY AREA

The area covered by the Plan is known as the Strategic Assessment Area. It covers 7,101 ha within the Victorian Volcanic Plains Bioregion. It includes:

- The entire Northern Geelong Growth Area (Northern Growth Area) as described in the Framework Plan which occurs in the Lovely Banks locality and covers 2,103.9ha
- The two northern precinct structure plans within the Western Geelong Growth Area (Western Growth Area) which covers 767.2ha and occurs in the Bell Post Hill and Batesford localities.

The Levy applies generally to the area shown in Figure 2. This is the 'Levy Area'. Within the Levy Area there are separate levies for the Northern Growth Area and the Western Growth Area. The specific area that the Levy applies to in the Northern Growth Area is shown in Figure 3. Areas nominated for Future Residential Potential and Future Employment Potential in the *Northern and Western Geelong Growth Areas Framework Plan August 2020* (NWGGA Framework Plan) have been excluded from the levy area as a land use change in these areas is not confirmed.

When preparing a PSP and calculating the levy per property the City will identify any areas that should be included or excluded from the land use budget and Levy calculation.

If land in the Levy Area is exempt from Part 10 of the EPBC Act and the commitments of the Plan then this land will be excluded from the Levy calculation. The exclusion of that land will occur at PSP approval.

Figure 2: General plan of biodiversity levy area

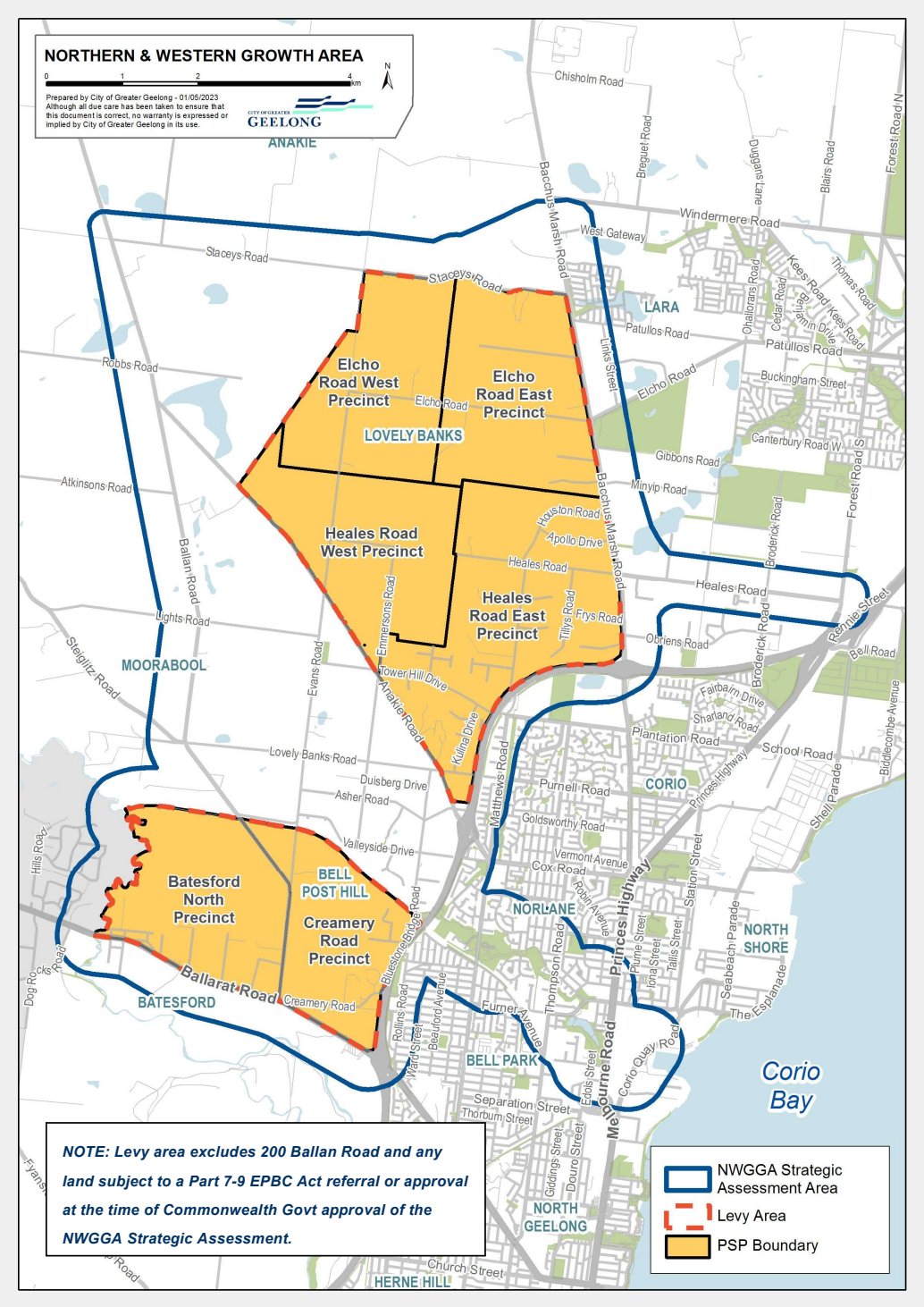
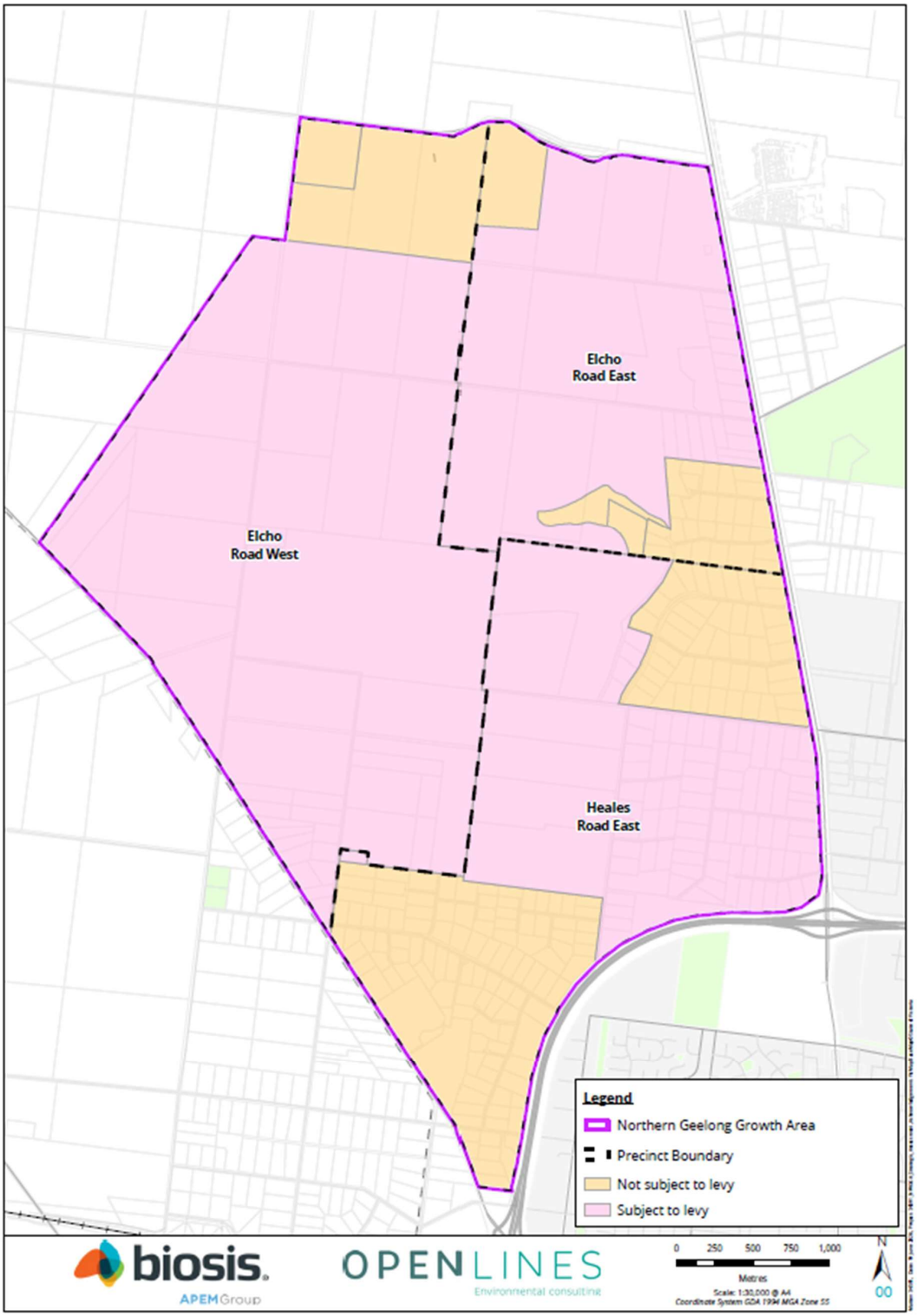


Figure 3 Specific plan of biodiversity levy area Northern Geelong Growth Area



The City will recover the full cost of the delivery and implementation of the commitments set out in the Plan from landholders/developers within the NWGGA during the life of the Plan.

Given the substantial difference in environmental values and impacts of the two growth areas, it is appropriate that separate and distinct levies apply to each of the Northern Growth Area and the Western Growth Area.

The Northern Growth Area Levy will fund:

- Securing and managing the conservation land in the Northern Growth Area including the Northern Conservation Area (NCA), Eastern Conservation Area (ECA) and Gully Avoidance Area;
- Securing external offsets;
- A share of the plan preparation, implementation and governance costs for the strategic assessment proportionate to the overall cost of implementation of the conservation commitments.

The Western Growth Area Levy will fund:

- Capital works and management of the Cowies Creek Conservation Area;
- A share of the plan preparation, implementation and governance costs for the strategic assessment proportionate to the overall cost of implementation of the conservation commitments.

The Levy is payable on the net developable area (NDA) of land within a property as determined by the relevant approved and gazetted Precinct Structure Plan (PSP). For the purposes of this Funding Program the NDA is defined as the total amount of land within the precinct that is made available for development. It is the total precinct area minus community facilities, government educational facilities, open space, arterial roads and other encumbered land as determined by the NDA in the relevant gazetted PSP.

There are five precincts that will benefit from the EPBC Plan and approval. These precincts will share the costs of delivering the projects that make up their respective Levy as outlined in Table 2.

The share of costs attributed to each precinct is based on the estimated NDA for the precinct as of June 2026. Estimates are based on draft Precinct Structure Plans (PSP) if available or the *Northern and Western Geelong Growth Areas Framework Plan August 2020* (NWGGA Framework Plan) "Residential Area" figures less 20% to account for open space, roads, other non-residential land uses and infrastructure. The percentage share of costs is fixed and not subject to change. Areas nominated for Future Residential Potential and Future Employment Potential have been excluded from this calculation as a land use change in these areas is not confirmed.

Table 2: Share of costs to be applied per Precinct

Precinct	Estimated NDA (HA)	Share of costs (%)
Western Growth Area (precincts subject to SA)		
Creamery Road	197	43
Batesford North	264	57
TOTAL	**461**	**100%**
Northern Growth Area		
Elcho Road East	284	25
Elcho Road West (includes Heales Road West)	572	50
Heales Road East	287	25
TOTAL	**1143**	**100%**

The final NDA used to calculate the Levy for each precinct will be determined on the approval and gazettal of the respective PSP within the levy area. At this point in time, the Funding Program will be updated with an appendix outlining the NDA of each property and the Levy for the precinct.

Once a PSP is approved the contributions per property will not be amended to respond to changes to the land budget that may result from the subdivision process.

The purpose of determining levies at approval of the PSPs is to ensure that the levy area accurately reflects the land which benefits from the EPBC Plan and to ensure that the Levy provides for the accurate recovery of costs associated with implementation of the Plan's conservation commitments. The process of adjusting, indexing and reconciling levy costs are outlined in Chapter 4.

PROJECT COSTS

Each project has been assigned a land, construction or administration cost, as listed in Table 3 and 4. The costs are expressed in 2026 dollars unless otherwise stated in Appendix 1 and will be adjusted annually in accordance with the method specified in Chapter 4.

For the conservation land forming part of the Levy, the values have been calculated through a site-specific valuation on a 'before and after basis.

Refer to Appendix 1 for a more detailed breakdown of costs and Appendix 2 for details of External offset costs.

Table 3: Northern Growth Area project costs

Project number NG=Northern Grth Area WG=Western Grth Area SH=Shared btw Grth Areas	Project name	Land area (HA)	Project cost	Share of cost	Cost to Levy
Conservation Areas – Land					0
NG_CA_L_1	165 Staceys Road as conservation land - Northern Conservation Area (NCA)	34.10	$4,100,000	100%	**$4,100,000**
NG_CA_L_2	195 Staceys Road as conservation land (NCA)	32.60	$4,100,000	100%	**$4,100,000**
NG_CA_L_3	Part 225 Staceys Road as conservation land (NCA)	15.00	$2,270,000	100%	**$2,270,000**
NG_CA_L_4	Part 135 Staceys Road as conservation land (NCA)	26.32	$10,375,000	100%	**$10,375,000**
NG_CA_L_5	Part 295-335 Elcho Road as conservation land – Eastern Conservation Area (ECA)	6.7	$$3,990,000	100%	**$3,990,000**
Conservation Areas – Management					0
NG_CA_CW_1	Conservation contractors & works (NCA) 0-10 years	-	$6,448,196	100%	**$6,448,196**
NG_CA_CW_2	Conservation contractors & works (ECA) 0-10 years	-	$494,078	100%	**$494,078**
NG_CA_CW_3	Conservation contractors & works (Gully area)	-	$494,078	100%	**$494,078**
NG_CA_CW_4	Conservation maintenance costs 10-30 years	-	$2,000,000	100%	**$2,000,000**
SH_CA_CW_5	Conservation staff (0.89 EFT)	-	$3,710,464	89%	**$3,302,312**

External Offsets					0
NG_OF_1_NTG	15.5 ha of Natural Temperate Grassland	-	$6,221,555	100%	**$6,221,555**
NG_OF_2_SLL	291.5 ha of habitat for Striped Legless Lizard	-	$29,338,649	100%	**$29,338,649**
NG_OF_3_GSM	424 ha of habitat for Golden Sun Moth	-	$18,244,837	100%	**$18,244,837**
NG_OF_4_BR	External offsets advice and brokerage cost	-	$300,000	100%	**$300,000**
NG_OF_5_VGED	Vic Grassland Earless Dragon	-	$12,700,000	100%	**$12,700,000**
Plan Preparation, Implementation and Governance					0
SH_PI_M_1	MERI framework development & implementation	-	$ 375,000	89%	**$337,750**
SH_PI_M_2	Project management staff(0.89 EFT)		$4,800,752	89%	**$4,272,669**
SH_PI_C_1	Compliance, education, admin staff (0.89 EFT)	-	$3,710,464	89%	**$3,302,312**
SH_PI_PP_1	Preparation of EPBC Plan, BCS, SAR and Surveys	-	$2,199,982	89%	**$1,957,984**
NG_PI_PP_2	Technical study for Hovells Creek	-	$110,154	100%	**$110,154**
SH_PI_PP_3	Miscellaneous Consultancy costs	-	$200,000	89%	**$178,000**
NG_PI_PP_4	Conservation management plan for NCA	-	$80,900	100%	**$80,900**
NG_PI_PP_6	Conservation management plan for ECA	-	$50,000	100%	**$50,000**
NG_PI_F_1	Finance / interest costs (land acquisition)	-	$3,769,200	100%	**$3,769,200**
NG_PI_F_2	Compensation (land acquisition)	-	$2,617,500	100%	**$2,617,500**
Total cost (Northern Growth Area)					**$121,055,174**

Table 4: Western Growth Area project costs

Project number	Project name	Land area (HA)	Project cost	Share of cost	Cost to Levy
Conservation Area					0
WG_CA_CW_1	Landscape contractors and works (Cowies Creek) 0-10 years	-	$6,594,152	100%	**$6,594,153**
WG_CA_CW_2	Conservation contractors and works (Cowies Creek) 0-10 years	-	$5,305,755	100%	**$5,305,755**
WG_CA_CW_3	Growling Grass Frog Wetland 20 Evans Road, Bell Post Hill	-	$1,191,054	100%	**$ 1,191,054**
WG_CA_CW_4	Growling Grass Frog Wetland No.1 30-35 Avonlea Road, Bell Post Hill	-	$1,240,667	100%	**$1,240,667**
WG_CA_CW_5	Growling Grass Frog Wetland No.2 30-35 Avonlea Road, Bell Post Hill	-	$855,815	100%	**$855,816**
WG_CA_CW_6	Growling Grass Frog Wetland 299 Anakie Road, Lovely Banks	-	$2,089,040	100%	**$2,089,041**
WG_CA_CW_7	Cultural Heritage Advice – across all wetlands	-	$30,000	100%	**$30,000**
WG_CA_CW_8	Conservation maintenance costs (Cowies Creek) 10-30 years	-	$1,000,000	100%	**$1,000,000**
SH_CA_CW_9	Conservation staff (0.11 EFT)	-	$3,710,464	11%	**$408,151**
Plan preparation, Implementation and Governance					0
SH_PI_M_1	MERI framework development and implementation	-	$375,000	11%	**$37,500**
SH_PI_M_2	Project management staff (0.11 EFT)	-	$4,800,752	11%	**$528,082**
SH_PI_C_1	Compliance, education, admin staff (0.11 EFT)	-	$3,710,464	11%	**$408,151**
SH_PI_PP_1	Preparation of EPBC Plan, BCS, SAR and Surveys	-	$2,199,982	11%	**$241,998**
WG_PI_PP_2	Technical water studies for Moorabool River	-	$150,000	100%	**$150,000**

SH_PI_PP_3	Miscellaneous Consultancy costs	-	$200,000	11%	**$22,000**
WG_PI_PP_5	Conservation management plan for Cowies Creek Conservation Reserve	-	$106,378	100%	**$106,378**
WG_PI_PP_6	Investigations and Plan for Moorabool River Conservation and Avoidance Areas	-	$150,000	100%	**$150,000**
Total costs (Western Growth Area)					**$20,358,746**

BIODIVERSITY LEVY

The final levy per hectare of Net Developable Area (NDA) by PSP area will be calculated as each PSP is approved and gazetted and Appendix 3 will be updated accordingly over time. The estimated Levy payable for each PSP area is shown in Table 5 and Table 6. The levies shown are estimates only based on draft Precinct Structure Plans (PSP) if available or the NWGGA Framework Plan "Residential Area" figures less 20% (as per Table 2 of this Funding Program).

The Levy is imposed to land within the Levy Area:

- For parcels wholly within the levy area, the whole of NDA within that parcel of land will be charged.
- For parcels partly within the levy area, the NDA of that part will be charged

The Levy payment will be coordinated with the development administrative processes outlined in section 4 in the following circumstances:

- The issue of a statement of compliance for a plan of subdivision in relation to a parcel of land wholly or partly within the levy area
- The making of an application for a building permit for the construction of a building on a parcel of land wholly or partly within the levy area
- The approval of a work plan or variation to a work plan under section 77G of the Mineral Resources (Sustainable Development) Act 1990 to carry out an extractive industry

The Levy is only payable once in respect of land. The payment of the levy will be recorded in the 'developer registration system' in accordance with the Plan and the administrative process outlined in section 4 below.

The Levy is payable by a development proponent irrespective of any particular impact to MNES caused by the specific subdivision and/or development proposal.

However, the City will monitor the impacts of specific development proposals on MNES, to ensure that the City is achieving the objectives, outcomes, commitments and measures in the Plan and supporting documents.

For the avoidance of doubt, the Levy is not payable in respect of development which occurs on land entirely outside the NDA of a property within a PSP area.

The City in its absolute discretion may waive or defer the requirement to pay the Levy in relation to a development proposal comprised of minor buildings, works and/or other development associated with a pre-existing land use.

The City in its absolute discretion may agree to the staging of the requirement to pay the levy to accord with staged development proposals. For example, subdivision of a parcel would trigger the first administrative process listed above. The Council will consider staging proposals where land is part developed and part balance lots.

Table 5: Estimated Western Growth Area Levy by precinct (levy subject to change as PSPs approved & costs updated)

Precinct	Estimated NDA	Share (%)	Share of total cost (2025)	Levy per HA of NDA
Creamery Rd	197	43	$8,754,261	$44,162
Batesford Nth	264	57	$11,604,485	$44,162
Total	461	100	$20,358,746	$44,162

Table 6: Estimated Northern Growth Area Levy by precinct (levy subject to change as PSPs approved & costs updated)

Precinct	Estimated NDA	Share (%)	Share of total cost (2025)	Levy per HA of NDA
Elcho Rd East	284	25	$30,396,170	$105,910
Elcho Rd West (inc Heales Rd West	572	50	$60,792,340	$105,910
Heales Rd East	287	25	$30,396,170	$105,910
Total	1143	100	$121,055,174	$105,910

4. Administration and Implementation

This section:

- Sets out how the Funding Program will be administered and implemented under the EPBC Act alongside development permitted under the Victorian planning system;
- Specifies when the Levy must be paid;
- Describes when and how the City may accept the delivery of works, land or offsets by a development proponent, or request the provision of offsets by a development proponent, in lieu of cash payments towards the Levy liability;
- Sets out how costs will be indexed over time;
- Specifies when the Funding Program will be reviewed and adjusted as necessary over time; and
- Describes how the Funding Program will be used by the City to monitor impacts to MNES over the life of the Plan, to ensure that offset delivery keeps pace with and occurs ahead of impacts within the Northern Growth Area (Commitment No. 18).

IMPLEMENTATION UNDER THE EPBC ACT AND COORDINATION WITH THE VICTORIAN PLANNING SYSTEM

Prior to taking an action, landholders/developers are required to seek the City's authorisation to proceed with that action and rely on the City's approval under Part 10 of the EPBC Act. Authorisation will be subject to compliance with Commonwealth conditions of approval and the Plan, including the obligation under the Plan to pay the Levy pursuant to this Funding Program.

The Figure 4 depicts how the Funding Program will be implemented under the EPBC Act and the Victorian planning system.

The diagram demonstrates that the City will administer and implement the Funding Program under the EPBC Act and coordinate this implementation with timeframes and milestones under Victorian planning system.

The ability of a development proponent to rely on the City's approval under Part 10 of the EPBC Act, and the obligation to pay the Levy, arise under the EPBC Act. The provisions of the Greater Geelong Planning Scheme, and the permit application process under the *Planning and Environment Act 1987* (Vic), will ensure that relevant development carried out within the NWGGA is consistent and coordinated with the Commonwealth conditions of approval, the Plan and supporting documents (including this Funding Program).

To rely on the City's approval under Part 10 of the EPBC Act, a development proponent will first need to lodge a 'developer registration form' with the City, which initiates the process set out in the 'EPBC Act Stream' on the above diagram. The City will administer this developer registration system in its capacity as the approval holder and in accordance with the Plan and supporting documents.

In addition, if a permit is required for the proposed development, a development proponent will need to demonstrate as part of that permit application that it has obtained the City's consent under the 'EPBC Act Stream', and thereafter meet the requirements set out in the 'Planning Stream' in the above diagram.

The requirement to submit a 'developer implementation plan' under both the 'EPBC Act Stream' and the 'Planning Stream' will ensure consistency and coordination across both processes. For example, it is critical that a person undertaking a class of development has consistency in the staging so that the class of action does not precede satisfaction of the EPBC Act obligations. Likewise changes in a development proposal over time (for example revised staging) will necessitate changes considered under the Plan and changes to be considered under the *Planning and Environment Act 1987*.

A 'developer implementation plan' must:

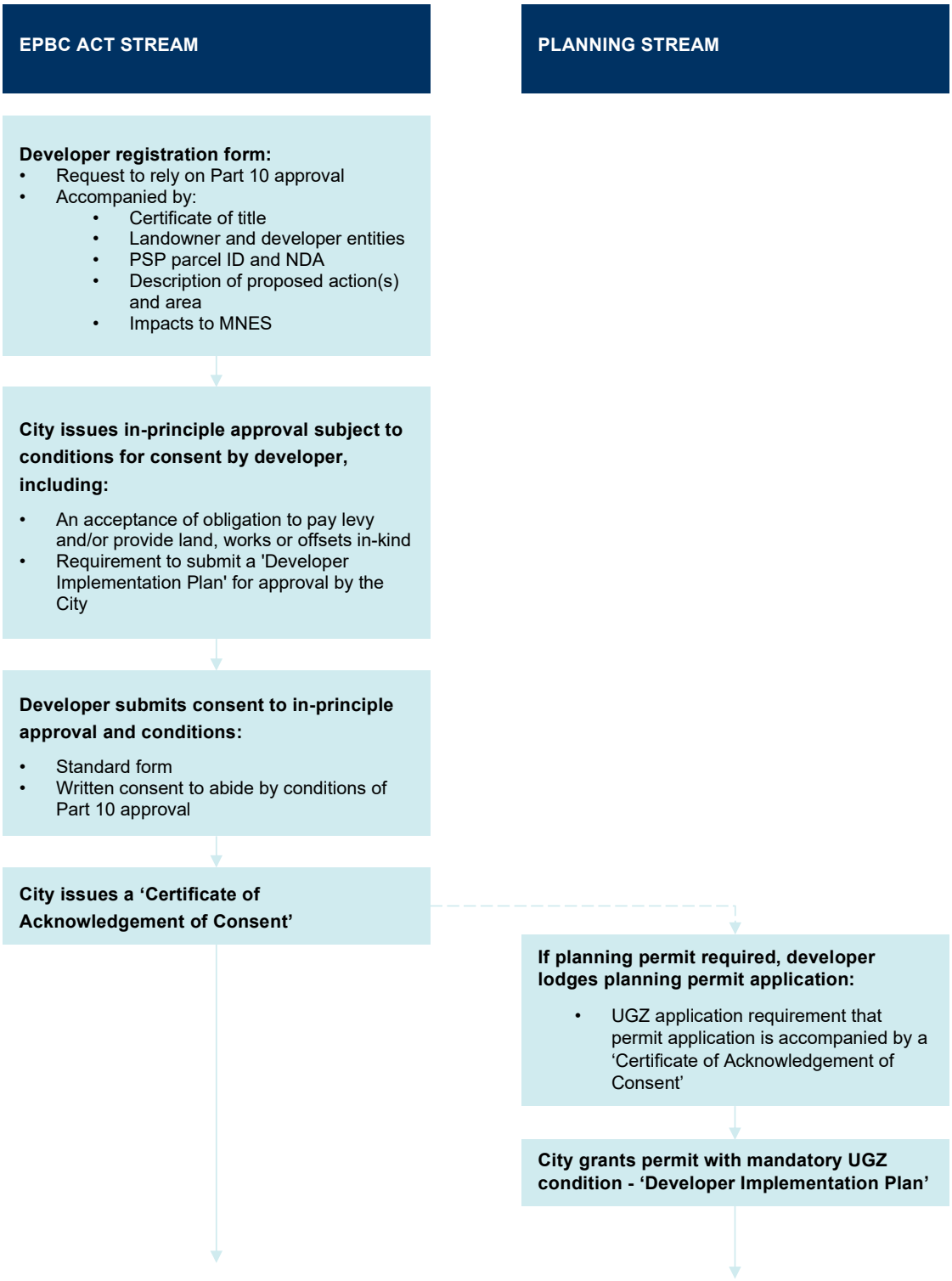
- Demonstrate that the proposed development satisfies all applicable Commonwealth conditions of approval and complies with the Plan and supporting documents; and
- address various matters including the total area of the plan, the NDA, the proposed development activities, land and/or works and/or offsets proposed to be delivered in lieu of a cash payment towards the Levy, impacts to MNES, and mitigation measures to minimise potential direct and indirect impacts as outlined in the Plan and supporting documents. Note: offsets are only relevant to the Northern Growth Area.

A 'developer implementation plan' must be approved by the City as the approval holder under the 'EPBC Act Stream,' and endorsed by the responsible authority under the 'Planning Stream'.

Upon the approval and endorsement of a 'developer implementation plan':

- The City as approval holder will issue a ‘developer liability statement’ under the ‘EPBC Act Stream’, which confirms the total Levy liability, the timing for the payment of the Levy liability, and any land, works or offsets in kind;
- If required due to the complexity of the land, works or offsets in kind, or any other requirement contained in the ‘developer implementation plan’, the City as approval holder and (if applicable) responsible authority may require that the development proponent enter into an agreement (such as a deed of agreement or an agreement under section 173 of the *Planning and Environment Act 1987*) to secure the developer’s obligations. The agreement must be prepared at the cost of the development proponent/permit holder.

Figure 4: Process outlining implementation of the funding program



EPBC ACT STREAM

PLANNING STREAM

Developer submits 'Developer Implementation Plan' to the City as approval holder

Developer submits 'Developer Implementation Plan' to the City as Responsible Authority

'Developer Implementation Plan includes:

- Demonstrates satisfaction with Commonwealth conditions of approval and complies with the Plan
- The NDA, staging and the development activity
- Land, works and/or offsets in-kind
- Impacts to MNES
- Mitigation measures to minimise indirect impacts

City approves 'Developer Implementation Plan' and issues 'Developer Liability Statement' as approval holder which includes:

- Timing for payment of levy
- Land, works or offsets in kind

City endorses 'Developer Implementation Plan' as Responsible Authority

City and developer enter a deed or s173 agreement if the complexity of land, works or offsets in kind requires it

City issues 'Interim Statements of Satisfaction' where there is staged payment and/or delivery

City monitors compliance with endorsed 'Developer Implementation Plan' as required

City issues a 'Certificate of Satisfaction' when:

- The levy liability in respect of the land is fully discharged
- Maintains a record on its developer registration system

City provides a refund of any excess credits at the completion of the delivery of any land, works or offsets in-kind

Review

A development proponent/permit holder can seek a review of conditions attached to any 'in-principle approval' issued by the City under the 'EPBC Act Stream', or the City's decision to not approve a 'developer implementation plan', from the *Northern and Western Geelong Growth Areas EPBC Plan Executive Committee*.

Implementation in the Greater Geelong Planning Scheme

This Funding Program will be implemented in the Greater Geelong Planning Scheme as follows:

- It, along with the Plan, will be a policy document; and
- The Schedule to the Urban Growth Zone for each PSP within the NWGGA will include:
    - A permit application requirement regarding evidence of consent under the 'EPBC Act Stream'; and
    - A permit condition which generally requires: prior to the certification of a plan of subdivision or the commencement of development (whichever comes first), a 'Commonwealth biodiversity – developer implementation plan' must be submitted to, and approved by, the responsible authority (see above regarding 'developer implementation plans').

Discretion to require offsets in lieu of cash payments towards Levy liability

The City as the approval holder for the Plan may require that a development proponent provide offsets in lieu of a cash payment towards all or part of the Levy liability, in circumstances where the City determines in its discretion that offsets are required to ensure that offset delivery is keeping pace with and occurring ahead of impacts within the NGGA (Commitment No. 18 in the Plan). In those circumstances, a 'developer implementation plan' will be approved where it is demonstrated that, where required, offsets have been or will be secured to mitigate the impacts of the proposed development.

TIMING FOR PAYMENT OF LEVY LIABILITY

For subdivision of land

Provided it has not already been paid in respect of the subject land, the Levy liability must be paid to the City after certification of the relevant plan of subdivision but not more than 21 days prior to the issue of a Statement of Compliance in respect of that plan, or as otherwise agreed by the City. If the City agrees to alternative timing for payment, it must be reflected in the relevant 'developer implementation plan' and, if deemed necessary by the City, secured by way of a deed of agreement or section 173 agreement.

Where the subdivision is carried out in stages and the City has approved staged payment, the Levy liability for a stage must be paid to the City after certification of the relevant plan of subdivision for that stage, but not more than 21 days prior to the issue of a Statement of Compliance for that stage, or as otherwise agreed by the City. If the City agrees to alternative timing for payment, it must be reflected in the relevant 'developer implementation plan' and, if deemed necessary by the City, secured by way of a deed of agreement or section 173 agreement.

If payment is not received for the Levy, any deficit will be indexed annually.

For development of land where no subdivision is proposed

Provided it has not already been paid in respect of the subject land, the Levy liability must be paid to the City prior to the commencement of any development (development includes buildings, car park, access ways, landscaping and ancillary components).

If payment is not received for the Levy, any deficit will be indexed annually.

Where no planning permit is required

Where no planning permit is required for development of land within the Levy Area, a development proponent is still required to seek approval for the development under the 'EPBC Act Stream'.

If the land is Net Developable Area and subject to the Levy and provided the Levy has not already been paid in respect of the subject land, the Levy liability must be paid to the City prior to the commencement of any development (including subdivisional works), or as otherwise agreed by the City as approval holder. If the City agrees to alternative timing for payment, it must be reflected in the relevant 'developer implementation plan' and, if deemed necessary by the City, secured by way of a deed of agreement.

WORKS-IN-KIND, LAND IN KIND AND OFFSETS

The City may choose to accept the delivery of works, land or offsets by a development proponent in lieu of cash payments towards the Levy liability, or request the provision of offsets by a development proponent in lieu of cash payments towards the Levy liability, provided that:

- The works, land or offsets constitute projects that are funded by the Levy;
- The City is satisfied that the timing of the delivery of the land or offsets is consistent with priorities in the Plan;
- The condition of the land is to the satisfaction of the City;
- The works are permanent. Temporary works will not be accepted as works in kind.
- The development proponent complies with all applicable requirements of the City, including tendering, documentation, supervision, and other related requirements.
- Offsets must be provided to the satisfaction of the City and fulfil the following criteria:
  - Secured in perpetuity.
  - Align with the offsets identified in the Plan and not already provided by another party.
  - Include a conservation management plan to outline the values on site and how the values will be improved overtime and conservation advice for the requisite species.
  - Need to meet the strategic landscape outcomes outlined in the Plan and be in accordance with guidelines published by the City.
- There must be no negative financial impact on the Funding Program implementation to the satisfaction of the City.

Where the City agrees to accept the delivery of works, land or offsets in lieu of a cash contribution, or requests the provision of offsets in lieu of a cash contribution, (subject to the above requirements):

- The credit for the works shall equal the final cost of the works as identified in this Funding Program, subject to indexation in accordance with this Funding Program, and the City has approved staged payment.
- The value of works will be applied as a credit against the Levy liability payable by the development proponent;
- No cash contributions towards the Levy liability will be required until the credit has been extinguished unless otherwise determined by the City (e.g. if Levy cash flow is required to administer the Program); and
- Where works identified in the Funding Program are delivered in part, the City will determine the credit having regard to any wasted costs or costs of mobilisation that are associated with partial delivery.

CREDIT FOR OVER PROVISION

Where the City agrees to accept the delivery of works, land or offsets, or requires the delivery of offsets, in lieu of a cash contribution, the situation may arise where the development proponent makes a contribution with a value that exceeds the applicable Levy liability under this Funding Program (over-provision).

In circumstances where the developer registers an overprovision recognised by the City, the City may agree to pay a cash reimbursement to the development proponent in the amount of the over-provision. The over-provision arrangements will be recorded in a deed of agreement or section 173 agreement.

The value of any credit and reimbursements for the construction of works, land or offsets shall equal the cost of the works identified in this Funding Program, subject to indexation in accordance with this Funding Program.

CREDIT FOR EARLY PROVISION

Where a developer is in credit against their Levy liability this credit balance will be indexed annually in accordance with the annual increase in the Levy.

The City may agree to accept early provision of offsets when approving the developer implementation plan.

FUNDS ADMINISTRATION

Levies which are collected under this Funding Program will be held by the City until required to be expended on implementation of the Plan's commitments and measures.

Details and records of funds received, and expenditures will be held by the City in accordance with the provisions of the *Local Government Act 2020* (Vic).

The administration of contributions made under the Funding Program will be transparent and demonstrate the:

- Amount and timing of funds collected
- Source of the funds collected

- Amount and timing of expenditure on specific projects
- Project on which the expenditure was made
- Details of works in kind, land in kind and offset arrangements

The City will provide for regular monitoring, reporting and review of the monies received and expended in accordance with this Funding Program.

The City will establish reserve accounts and all monies allocated to these accounts will be used solely for the provision of projects as itemised in the Funding Program.

Should Council achieve savings on any project or resolve not to proceed with any of the projects listed in this Funding Program, the funds collected for these items will be used for alternative works necessary to deliver the commitments and measures of the Plan. Changes to the projects and offsets identified in this Funding Program will be agreed to by the *Northern and Western Geelong Growth Areas EPBC Plan Executive Committee*.

INDEXATION

The Project Costs outlined in this Funding Program are in 2025 dollars and will be adjusted by the City annually in accordance with the methodologies outlined below.

The adjusted Project Costs must be calculated as at 1 July in each year.

The adjusted Project Costs will inform the Levy and the City will publish the amended Levy on it's website within 14 days of the adjustments being made.

Infrastructure Projects

Project Costs associated with the construction of infrastructure must be indexed annually in line with the *Australian Bureau of Statistics' Producer Price Indexes, Non-Residential Building Construction Index, Victoria*.

Land Projects

Project Costs associated with land value must be adjusted annually to reflect the value of the land as at the date of adjustment, to be determined by a registered valuer based on the same valuation principles that informed the initial valuation. Revisions may occur more frequently if market conditions warrant. Costs incurred by the acquiring authority under the *Land Acquisition and Compensation Act 1986* will be included in the Project Cost.

Offsets Projects

Project Costs associated with offsets must be adjusted annually pursuant to the following process:

- The City will seek an opinion of probable cost from a suitably qualified and experienced offset broker to inform the annual offset value per hectare.
- That offset value will be used to adjust the Project Costs associated with offsets.

REVIEW PERIOD

This Funding Program be reviewed when each PSP is prepared and approved to give effect to:

- Updates to any aspect of this Funding Program as required
- Review of projects required, as well as their costs and scope and provision trigger
- Preparation of a NDA and land budget for the new PSP for inclusion in this Funding Program.
- The publication of a Levy for the PSP area in question and updates to the Levy for any previous PSP areas as required.
- Review of land values for land to be purchased through the Plan.

MONITORING IMPACTS

The Plan identifies that impacts to MNES will not exceed offset delivery. This commitment and the early delivery of aspects of the offset program are central to the justification for the overall offset requirements.

The City will monitor impacts to MNES outlined in the Plan via the developer registration system under the 'EPBC Act Stream', as well as the PSP and planning permit process.

The PSP areas that are contributing impacts to MNES are shown in Table 7.

Table 7: MNES impact area and contribution to offset target

Precincts	Impact area (ha)	Offset target (ha)
Elcho Road East		
Golden Sun Moth	168.3	135
Striped Legless Lizard	49.5	126
Natural Temperate Grassland	4.0	11
Elcho Road West		
Golden Sun Moth	440.1	352
Striped Legless Lizard	65.8	167
Natural Temperate Grassland	1.8	5
Heales Road East		
Golden Sun Moth	24.4	19
Striped Legless Lizard	19.4	49
Natural Temperate Grassland	2.0	5
Total across the NGGA		
Golden Sun Moth	**632.8**	**506**
Striped Legless Lizard	**134.7**	**342**
Natural Temperate Grassland	**7.8**	**21**

Appendices

APPENDIX 1: PROJECT COSTS - SOURCES AND ASSUMPTIONS

Northern Growth Area Project Costings

Category	Project ID NG=Northern Grth Area WG=Western Grth Area SH=Shared	Project Name	Assumption Description	Description (Actual number)	Current Day Total Cost (2025)	Notes and details
Conservation areas	NG_CA_L_1	165 Staceys Road as conservation land - Northern Conservation Area (NCA)	$120,000 per hectare	34.2 Ha	**$4,100,000**	Source: *Urbis Land Valuation 14 November 2024*
	NG_CA_L_2	195 Staceys Road as conservation land (NCA)	$125,000 per hectare	32.77 Ha	**$4,100,000**	Source: *Urbis Land Valuation 14 November 2024*
	NG_CA_L_3	Part 225 Staceys Road as conservation land (NCA)	$125,000 per hectare	17.36 Ha	**$2,270,000**	Source: *Urbis Land Valuation 2 December 2024*
	NG_CA_L_4	Part 135 Staceys Road as conservation land (NCA)	$400,000 per hectare	25.96 Ha	**$10,375,000**	Source: *Urbis Land Valuation 8 July 2025*
	NG_CA_L_5	Part 295-335 Elcho Road as conservation land - Eastern Conservation Area (ECA)	$700,000 per hectare	5.7 Ha	**$3,990,000**	Source: *Urbis Land Valuation 8 Sept 2025 less 1 ha at $700,000 due to reserve size reduction*
	NG_CA_CW_1	Conservation contractors & works (NCA) 0-10 years	10-year management cost	Excludes GST	**$6,448,196**	Source: *Draft Northern Conservation Area Conservation Management Plan Practical Ecology, Feb 2025*
	NG_CA_CW_2	Conservation contractors & works (ECA) 0-10 years	10-year management cost		**$494,078**	Source: Estimate from consultant
	NG_CA_CW_3	Conservation contractors & works (Gully area)	10-year management cost		**$494,078**	Source: Estimate from consultant
	NG_CA_CW_4	Conservation maintenance costs 10-30 years	20-year maintenance cost	$100,000	**$2,000,000**	Source: CoGG estimate of $100K per year for 20 years to maintain NCA and ECA (may be partially used for pre-acquisition maintenance)
	SH_CA_CW_5	Conservation staff (0.89 EFT)	30 years of salary 89% share	$3,710,464	**$3,302,312**	Source: *City of Greater Geelong Enterprise Agreement (No.12) 2024* Band 6

Category	Project ID NG=Northern Grth Area WG=Western Grth Area SH=Shared	Project Name	Assumption Description	Description (Actual number)	Current Day Total Cost (2025)	Notes and details
External Offsets	NG_OF_1_NTG	External offsets - 15.5 ha of Natural Temperate Grassland	$350,000 per hectare + site costs	15.5 Ha	**$6,221,555**	Source: See Appendix 2 – July 2026 Letter from Biosis for details
	NG_OF_2_SLL	External offsets – 291.5 ha of habitat for Striped Legless Lizard	$45,000 per hectare + site costs	291.5 Ha	**$29,338,649**	Source: See Appendix 2 - July 2026 Letter from Biosis for details
	NG_OF_3_GSM	External offsets - 424 ha of habitat for Golden Sun Moth	$45,000 per hectare + site costs	424 Ha	**$18,244,837**	Source: See Appendix 2 - July 2026 Letter from Biosis for details
	NG_OF_4_BR	External offsets advice and brokerage cost			**$300,000**	Source: CoGG Estimate - includes initial broker fees and legal advice and annual cost updates and advice
	NG_OF_5_VGED	Victorian Grassland Earless Dragon	$11,900,000 = land values of former Area C plus $800,000 maintenance		**$12,700,000**	Source: *550 Elcho Rd Land Valuation Urbis 3 Sep 2025* $7,550,000 *870 Ballan Rd Land Valuation Urbis 3 Sep 2025* $4,350,000 *Biosis estimate for "Area C" maintenance 2026* $800,000
Plan Preparation, Implementation & Governance	SH_PI_M_1	MERI framework development & implementation	89% share of cost	$375,000.00	**$337,750**	Source: CoGG Estimate includes: 1. Develop MERI Program ($75,000), 2.Prepare (independent) end of plan evaluation ($50,000),3. Prepare (independent) five yearly assurance reports ($250,000)
	SH_PI_M_2	Project management staff(0.89 EFT)	30 years of salary - 89% share	$4,800,752	**$4,272,669**	Source: *City of Greater Geelong Enterprise Agreement (No.12) 2024* Band 8
	SH_PI_C_1	Compliance, education, admin staff (0.89 EFT)	30 years of salary - 89% share	$3,710,464	**$3,302,312**	Source: *City of Greater Geelong Enterprise Agreement (No.12) 2024* Band 6

Category	Project ID NG=Northern Grth Area WG=Western Grth Area SH=Shared	Project Name	Assumption Description	Description (Actual number)	Current Day Total Cost (2025)	Notes and details
	SH_PI_PP_1	Preparation of EPBC Plan, BCS, SAR and Surveys	89% share of cost	$199,982.00	**$1,957,984**	Source: Consultant fees incurred to date or contracted to occur (figure subject to confirmation)
	NG_PI_PP_2	Technical study for Hovells Creek			**$110,154**	Source: Contracted consultant fee to prepare the study
	SH_PI_PP_3	Miscellaneous Consultancy costs	89% share of cost	$200,000	**$178,000**	Source: CoGG estimates to 1. Prepare process based development approval standards ($30,000) 2. Prepare Stakeholder Engagement Strategy ($30,000) 3. Legal advice on Funding arrangements ($60,000) 4.Prepare online development registration system ($60,000), 5.Prepare Data management and sharing agreement ($20,000)
	NG_PI_PP_4	Conservation management plan for NCA			**$80,900**	Source: $30,900 costs incurred on CMP plus $50,000 for updates with additional area added
	NG_PI_PP_6	Conservation management plan for ECA			**$50,000**	Source: CoGG Estimate and includes Gully Avoidance Area
	NG_PI_F_1	Finance / interest costs (land acquisition)			**$3,769,200**	Source: CoGG Estimate 3.6% interest over 10 years for Stage 1 NCA FZ properties
	NG_PI_F_2	Compensation (land acquisition)			**$2,617,500**	Source: CoGG Estimate 25% of the total land acquisition cost for Stage 1 NCA FZ properties
				TOTAL	**$121,055,174**	

Western Growth Area Project Costings

Category	Project ID NG=Northern Grth Area WG=Western Grth Area SH=Shared	Project Name	Assumption Description	Description (Actual number)	Current Day Total Cost (2025)	Notes and Details
Conservation Areas	WG_CA_CW_1	Landscape contractors and works (Cowies Creek) 0-10 years	Costs from Landscape Masterplan less costs for frog wetland creation. Costs exclude GST		**$6,594,153**	Source: *Cowies Creek Worneenanyook Landscape MasterPlan, GbLA LANDSCAPE ARCHITECTS, June 2024.*
	WG_CA_CW_2	Conservation contractors and works (Cowies Creek) 0-10 years	Costs exclude GST		**$5,305,755**	Source: *WGGA Cowies Creek Conservation Area Growling Grass Frog Conservation Management Plan DRAFT REPORT,* *Biosis July 2024*. Note total in Biosis report was incorrect
	WG_CA_CW_3	Growling Grass Frog Wetland 20 Evans Road, Bell Post Hill			**$1,191,054**	Source: Based on 2026 costings provided by Creo Consulting on behalf of Villawood and adjusted for size of wetland
	WG_CA_CW_4	Growling Grass Frog Wetland No.1 30-35 Avonlea Road, Bell Post Hill			**$1,240,667**	Source: Based on 2026 costings provided by Creo Consulting on behalf of Villawood and adjusted for size of wetland
	WG_CA_CW_5	Growling Grass Frog Wetland No.2 30-35 Avonlea Road, Bell Post Hill			**$855,815**	Source: Based on 2026 costings provided by Creo Consulting on behalf of Villawood and adjusted for size of wetland
	WG_CA_CW_6	Growling Grass Frog Wetland 299 Anakie Road, Lovely Banks			**$2,089,040**	Source: Based on 2026 costings provided by Creo Consulting on behalf of Villawood and adjusted for size of wetland
	WG_CA_CW_7	Cultural Heritage Advice – across all wetlands			**$30,000**	Source: CoGG Estimate

Category	Project ID NG=Northern Grth Area WG=Western Grth Area SH=Shared	Project Name	Assumption Description	Description (Actual number)	Current Day Total Cost (2025)	Notes and Details
	WG_CA_CW_8	Conservation maintenance costs (Cowies Creek) 10-30 years	20-year maintenance cost per year	$50,000	**$1,000,000**	Source: CoGG Estimate
	SH_CA_CW_5	Conservation staff (0.11EFT)	30 years of salary - 11% share	$3,710,464	**$408,151**	Source: *City of Greater Geelong Enterprise Agreement (No.12) 2024* - Band 6
Plan Preparation, Implementation & Governance	SH_PI_M_1	MERI framework development and implementation	share of cost 11%	$375,000	**$37,500**	Source: CoGG Estimate includes: 1. Develop MERI Program ($75,000), 2.Prepare (independent) end of plan evaluation ($50,000), 3. Prepare (independent) five yearly assurance reports ($250,000)
	SH_PI_M_2	Project management staff (0.11 EFT)	30 years of salary - 11% share	$4,800,752	**$528,082**	Source: *City of Greater Geelong Enterprise Agreement (No.12) 2024* Band 8
	SH_PI_C_1	Compliance, education, admin staff (0.11 EFT)	30 years of salary - 11% share	$3,710,464	**$408,151**	Source: *City of Greater Geelong Enterprise Agreement (No.12) 2024* Band 6
	SH_PI_PP_1	Preparation of EPBC Plan, BCS, SAR and Surveys	share of cost 11%		**$241,998**	Source: Consultant fees incurred to date or contracted to occur (figure subject to confirmation)
	WG_PI_PP_2	Technical water studies for Moorabool River			**$150,000**	Source: CoGG estimate - Relates to MNES in downstream Moorabool River and Barwon River/Lake Connewarre
	SH_PI_PP_3	Miscellaneous Consultancy costs	share of cost 11%	$200,000	**$22,000**	Source: CoGG estimates to 1. Prepare process based development approval standards ($30,000) 2. Prepare Stakeholder Engagement Strategy ($30,000) 3. Legal advice on Funding arrangements ($60,000) 4.Prepare online development registration system ($60,000),

Category	Project ID NG=Northern Grth Area WG=Western Grth Area SH=Shared	Project Name	Assumption Description	Description (Actual number)	Current Day Total Cost (2025)	Notes and Details
						5.Prepare Data management and sharing agreement ($20,000)
	WG_PI_PP_5	Conservation management plan for Cowies Creek Conservation Reserve			**$106,378**	Source: Cost incurred to prepare draft CMP ($55,129) + 2026 updates ($51,249)
	WG_PI_PP_6	Investigations and Plan for Moorabool River Conservation and Avoidance Areas			**$150,000**	Source: CoGG estimate
				TOTAL	**$20,358,746**	

APPENDIX 2: EXTERNAL OFFSET INFORMATION

14 July 2026

City of Greater Geelong

Commonwealth offset estimate advice for the Northern and Western Geelong Growth Areas Strategic Assessment
Our ref: Matter 34591

Background

Development within the Northern and Western Geelong Growth Areas (Growth Areas) and associated infrastructure development outside the Growth Areas will lead to impacts to matters of national environmental significance (MNES) protected under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

To support development in the Growth Areas and to protect MNES, the City is undertaking a strategic assessment under Part 10 of the EPBC Act. As part of the strategic assessment process, the City has prepared the Northern and Western Geelong Growth Areas EPBC Plan (the Plan).

The Plan is supported by a Strategic Assessment Report and three implementation documents, including the NWGGA Strategic Assessment Funding Program. The Funding Program outlines the conservation land, offsets, resources and works that are required to give effect to the commitments of the Plan.

This advice has been prepared to support the Funding Program and includes:

- A summary of the external offset requirements committed to in the Plan.
- Cost estimates to secure the external offsets and implement EPBC offset policy requirements for the life of the Plan (30 years).
- A detailed breakdown of assumptions informing the cost estimates.

This advice is informed by Biosis' experience in delivering Commonwealth offset packages and implementing offset management plan requirements. Accredited native vegetation offset broker, Vegetation Link, was consulted during preparation. This advice is based on current offset market conditions, which is a highly volatile and shallow market, and the assumptions are likely to change over the life of the Plan. All projects, offset site conditions, landowner negotiations and management plans are situation/site specific, meaning this advice is general in nature and should be regularly revised as more accurate inputs are available.

Biosis Pty Ltd
Melbourne
38 Bertie Street
Port Melbourne VIC 3207
Phone: 03 8686 4800
Fax: 03 9646 9242
ACN 006 175 097
ABN 65 006 175 097
Email: melbourne@biosis.com.au
biosis.com.au

Biosis acknowledges the Aboriginal and Torres Strait Islander peoples as Traditional Custodians of the land on which we live and work.
We pay our respects to the Traditional Custodians and Elders past and present and honour their connection to Country and ongoing contribution to society.

Advice

Offset requirements

Commitment 16 of the Plan states that offset sites will be established to meet the following requirements:

- 21 hectares of Natural Temperate Grassland of the Victorian Volcanic Plan (NTGVVP).
- 342 hectares of known habitat for Striped Legless Lizard *Delma impar* (SLL).
- 506 hectares of known habitat for Golden Sun Moth *Synemon plana* (GSM).

These offsets will be delivered through a combination of:

- The Northern and Eastern Conservation Areas in the Northern Geelong Growth Area (NGGA).
- Strategic offset locations outside of the NGGA to meet the balance of the offset requirements.

Table 1 outlines the total offset requirement for each MNES, the offset area available within the Northern and Eastern Conservation Areas, and the residual offset amount required to be delivered external to the Growth Areas.

Table 1 Offset requirement summary

MNES	Total offset requirement (ha)	Area within the Northern and Eastern Conservation Areas (ha)	Offsets to be delivered external to the NGGA (ha)
NTGVVP	21	5.5	15.5
SLL	342	50.5	291.5
GSM	506	82	424

Cost estimate for external offsets

The estimated cost to purchase and establish the required external offset sites, followed by implementation of the City's responsibilities as per standard offset management plan requirements, for the life of the Plan (30 years) is as follows:

- Lower estimate: $43,918,139.94, assuming the co-location of GSM habitat at all SLL offset sites. Table 2 provides a breakdown of the cost estimate per MNES.
- Middle estimate: $53,805,042.33, assuming the co-location of GSM habitat at half of the SLL offset sites. Table 3 provides a breakdown of the cost estimate per MNES.
- Upper estimate: $62,643,272.58, assuming no co-location of GSM at SLL offset sites. Table 4 provides a breakdown of the cost estimate per MNES.

Table 2 Lower cost estimate breakdown

MNES	External offset (ha)	Site sourcing, purchase and establishment	Monitoring & auditing	Total estimate
NTGVVP	15.5	$5,545,000.00	$676,555.99	$6,221,555.99
SLL	291.5	$22,762,500.00	$6,576,149.04	$29,338,649.04
GSM	132.5	$6,865,000.00	$1,492,934.92	$8,357,934.92
		$35,172,500.00	**$8,745,639.94**	**$43,918,139.94**

© Biosis 2026 | Leaders in Ecology, Heritage and Environmental Approvals

Table 3 Middle cost estimate breakdown

MNES	External offset (ha)	Site sourcing, purchase and establishment	Monitoring & auditing	Total estimate
NTGVVP	15.5	$5,545,000.00	$676,555.99	$6,221,555.99
SLL	291.5	$22,762,500.00	$6,576,149.04	$29,338,649.04
GSM	278.3	$14,512,500.00	$3,732,337.31	$18,244,837.31
		$42,820,000.00	**$10,985,042.33**	**$53,805,042.33**

Table 4 Upper cost estimate breakdown

MNES	External offset requirement (ha)	Site sourcing, purchase and establishment	Monitoring & auditing	Total estimate
NTGVVP	15.5	$5,545,000.00	$676,555.99	$6,221,555.99
SLL	291.5	$22,762,500.00	$5,527,476.90	$28,289,976.90
GSM	424	$22,160,000.00	$5,971,739.69	$28,131,739.69
		$50,467,500.00	**$12,175,772.58**	**$62,643,272.58**

Key assumptions informing these cost estimates are discussed in detail below.

Assumptions

Co-location of MNES

Commonwealth offset policy allows for the co-location of MNES at a single offset site provided all values are known to exist at the site and the co-location is confirmed at the time of offset management plan approval and site registration. It is not possible to co-locate MNES once an offset site is already registered. For this project, co-location of MNES could include:

- Site/s containing NTGVVP with suitable habitat and records for SLL and GSM.
- Site/s with suitable habitat and records for SLL and GSM.

Co-location of MNES minimises administration, upfront site purchase and establishment costs and ongoing implementation effort and costs. Co-location of MNES has the most influence on the overall cost of the offset package and largely depends on offset market availability and/or the effort applied during site searching and selection.

The following assumptions inform the lower, middle, and upper cost estimates:

- All estimates assume a single NTGVVP offset site could be sourced containing at least 15.5 hectares of the threatened ecological community. Given its relatively small size, we have assumed that SLL and GSM offsets would not be co-located at this site. Whilst it is likely that a good quality NTGVVP site would contain suitable habitat for SLL and/or GSM, the ongoing cost to monitor and audit the site for threatened fauna would not be cost efficient should the values be available at larger sites elsewhere.
- The lower estimate assumes all SLL offset sites would have suitable habitat and records for GSM. This means 291.5 hectares of the GSM offset requirement would be co-located within SLL offset sites. The remaining 132.5 hectare GSM requirement would be sourced separately.

- The middle estimate assumes half of the SLL offset sites would have suitable habitat and records for GSM. This means 145.8 hectares of the GSM offset requirement would be co-located within SLL offset sites. The remaining 278.3 hectare GSM requirement would be sourced separately.
- The upper estimate assumes none of the SLL offset sites would have suitable habitat and records for GSM, meaning the entire 424 hectare GSM offset requirement would need to be sourced separate to SLL.

Site sourcing and upfront purchase cost

The current availability of offset sites for the three MNES is low, and the upfront purchase cost (per hectare rate) is highly varied. The following assumptions are informed by recent market trades and discussions with accredited native vegetation offset broker, Vegetation Link:

- Offsets for NTGVVP are at critically low supply, which has caused the upfront purchase cost to increase significantly in recent years. Where sites are available, landowners are wanting to sell larger allocations of their site to minimise administrative and land management burden and risk. For smaller allocations, landowners are often asking for a minimum purchase price (i.e. $1M regardless of size). Based on recent market trades we have assumed a single 15.5 hectare site could be sourced at $350,000 per hectare.
- Offsets for SLL and GSM are in low supply and the full quantum required for this project is unlikely to currently exist in the market. However, advice from Vegetation Link is that sites can be brought to the market with enough lead time. The total number of sites required will depend on the ability to co-locate MNES and the size of each site. The number of sites secured will influence the total administrative and establishment costs and ongoing implementation effort and costs.
- The following assumptions inform the cost estimate:
  - Each SLL and GSM site would be a minimum of 50 hectares in size.
  - Up to six sites would be required to fulfil the 291.5 hectare SLL offset requirement.
  - For the lower estimate, assuming co-location of GSM and SLL, two additional GSM sites would be required to fulfil the balance of the requirement (132.5 hectares).
  - For the middle estimate, assuming co-location of GSM at half of the SLL sites, five additional GSM sites would be required to fulfil the balance of the requirement (278.3 hectares).
  - For the upper estimate, assuming no co-location of GSM and SLL, up to eight GSM sites would be required separate to the SLL sites to fulfill the 424 hectare requirement.
  - SLL sites could be sourced for an average of $75,000.00 per hectare.
  - GSM sites could be sourced for an average of $50,000.00 per hectare.

It is highly likely that the City (or the Growth Area landowners), with the assistance of an offset broker and experienced ecologist, would need to undertake a targeted site sourcing exercise to bring sites to market. This would include site identification, on-ground verification of MNES values and landowner negotiation prior to reaching an agreement to purchase. The cost estimate assumes the following:

- The values of the potential NTGVVP site would need to be ground-truthed through a vegetation assessment. The cost for this would be approximately $20,000.00 per site.
- Each potential SLL and GSM site would require a targeted species survey, which would cost approximately $50,000.00 and $20,000.00 respectively, per site.

© Biosis 2026 | Leaders in Ecology, Heritage and Environmental Approvals

Site establishment

Site establishment involves the necessary tasks to convert an offset site from in-principal agreement to registration. Typical tasks include:

- Site survey and site plan preparation.
- Offset management plan preparation.
- Site registration (i.e. Trust for Nature registration fees).

The cost estimate assumes site establishment would be in the order of $100,000.00 per site, and excludes site-specific items such as fencing, water point and access track installation. These excluded items are site specific and need to be negotiated and agreed with landowners at the time of purchase.

Offset site monitoring

Each offset management plan will include a program to monitor and report on the effectiveness of management actions, and progress against key performance and completion criteria. This typically occurs over a 10-year management period with key performance criteria including the management of threats and maintaining or increasing vegetation quality, threatened species habitat and their abundance.

Implementation of the monitoring program can be the responsibility of the landowner or the approval holder (the City). Given the strategic nature of this project and to minimise the City's approval compliance risk, it is recommended that the City take responsibility of annual monitoring for the 10-year management period.

The 10 year cost-estimate for each offset site type is as follows:

- NTGVVP: $361,023.13 per site
- SLL and GSM co-located: $780,491.98 per site
- SLL: $605,713.29 per site
- GSM: $430,934.60 per site.

The following assumptions inform the monitoring cost estimate:

- Monitoring for all offset sites would comprise the following:
  - Weed monitoring twice annually.
  - Pest animal monitoring twice annually.
  - Vegetation condition and species habitat (where required) monitoring annually.
  - Reporting annually.
- In addition, the following MNES specific monitoring would occur:
  - NTGVVP offset sites: Point intercept transects, Vegetation Quality Assessments and reporting at Baseline and Years 2, 4, 6, 8, 10.
  - SLL offset sites: Population monitoring and reporting at Baseline and Years 2, 4, 6, 8, 10.
  - GSM offset sites: Population monitoring and reporting at Baseline and Years 2, 4, 6, 8, 10.
- 3% inflation year on year for the 10-year period.

biosis
APEM Group

Offset site auditing

The City will be responsible for auditing the implementation and effectiveness of each offset management plan. Audits will need to be conducted by an independent ecologist at specified years, typically at the end of Years 1, 4, 8 and 10. To manage approval compliance risk, it is recommended the City continue site auditing every 5 years following Year 10 for the life of the Plan (i.e. at the end of Years 15, 20, 25 and 30). Additional audits may be triggered if an offset management plan is reviewed or following an environmental incident resulting in significant change to site conditions. Additional audit costs have not been included as they are currently unknown.

The cost estimate for the eight audit events over the 30-year Plan is $315,532.86 per site. There is an assumption of 3% inflation year on year for the 30-year period.

Please contact me at ---------- or ----------@biosis.com.au if you have any enquiries.

Yours sincerely

General Manager (Victoria)

© Biosis 2026 | Leaders in Ecology, Heritage and Environmental Approvals

APPENDIX 3: LAND BUDGET BY PSP

To be inserted when PSPs approved and gazetted.

CITY OF GREATER GEELONG
WADAWURRUNG COUNTRY
PO Box 104, Geelong VIC 3220
P: 5272 5272
E: contactus@geelongcity.vic.gov.au
www.geelongaustralia.com.au

CUSTOMER SERVICE CENTRE
Wurriki Nyal
137-149 Mercer Street, Geelong
8.00am – 5.00pm

LATEST NEWS:

@CityofGreaterGeelong
@GreaterGeelong
@CityofGreaterGeelong
CityofGreaterGeelong

CITY OF GREATER GEELONG

2.5. Amendment C450ggee - Creamery Road Precinct Structure Plan - Consideration of Panel Report and Adoption of Plan

Source: **Growth & Place**
Interim Executive Director: **Jacqueline Randles**

Purpose

1. To notify Councillors about changes to the draft planning scheme amendment C450ggee of the Greater Geelong Planning Scheme since Council endorsed its preparation and exhibition at its meeting on 27 August 2024, noting the Minister for Planning, not the City, is the planning authority for draft amendment.

2. To seek a Council resolution to support the updates to the Creamery Road Precinct Structure Plan (PSP) (Attachment 5), Development Contributions Plan (DCP) (Attachment 6) and Native Vegetation Precinct Plan (NVPP), and request that the Minister for Planning consider Amendment C450ggee under Section 20(4) of the *Planning and Environment Act 1987* (the Act).

Background

3. The Northern and Western Geelong Growth Areas (NWGGA) Framework Plan was adopted into the Greater Geelong Planning Scheme through Amendment C395 in May 2021. The NWGGA Framework Plan guides the development of the area to provide housing for 110,000 people.

4. In 2022, the City entered into an agreement with the Minister for Planning to appoint the NWGGA Standing Advisory Committee (the SAC) to advise on referred matters relating to the Northern and Western Geelong Growth Areas. This includes draft precinct structure plans, development contributions plans, biodiversity conservation strategy and any associated draft planning scheme amendments. The Minister appointed the SAC under Section 151(7) of the Act on 31 January 2023.

5. The processes and procedures of any relevant draft amendment referred to the SAC operate under the NWGGA SAC Terms of Reference. The Minister for Planning, not the City, is the planning authority for any amendments referred to under the Terms of Reference and will consider the final amendment under Section 20(4) of the Act.

6. The Creamery Road Precinct is the first precinct proposed to be developed as part of the Western Geelong Growth Area (WGGA). When developed, WGGA is anticipated to deliver approximately 22,000 new dwellings and house a population exceeding 60,000 persons. The Creamery Road Precinct is expected to accommodate approximately 4,200 dwellings housing around 11,770 residents.

7. The Creamery Road Precinct Structure Plan (PSP) will facilitate the urban development of Geelong's newest neighbourhood. It was prepared in accordance with the NWGGA Framework Plan, Clause 11.03-2S (Growth Areas) of the Greater Geelong Planning Scheme, and the PSP 2.0 Guidelines (VPA, 2021) which outlines a hierarchy of relevant considerations and delivery outcomes. These elements are grounded in state policy and strategy, or key future directions for greenfield precincts.

8. On 27 August 2024 Council resolved to prepare and exhibit Draft Amendment C450ggee. The Draft Amendment has been prepared by the City of Greater Geelong on behalf of the Minister for Planning who is the planning authority in this matter.

9. The Draft Amendment incorporates the Creamery Road PSP, Development Contributions Plan (DCP), Native Vegetation Precinct Plan (NVPP), applies the Urban Growth Zone Schedule 8 (UGZ8), and makes ordinance and mapping changes to support implementation of the PSP.

10. It also proposes measures to ensure that urban development within the Northern and Western Geelong Growth Areas is undertaken in a manner consistent with the NWGGA Environment Protection and Biodiversity Conservation Plan (EPBC Plan) and supporting documents.

11. Following SAC Referral 1 in 2025, Council officers undertook significant further work to refine the amount of encumbered land and the scope of projects covered under the DCP. This resulted in consequential changes to the land use, infrastructure provision, and drafting of the exhibited Creamery Road PSP and DCP. The exhibited PSP included more than 16 hectares of additional net developable area (NDA) than the previous version, capable of yielding an additional 320 dwellings and at least 900 more residents.

12. Through the increase in NDA and a thorough review and refinement of the scope and cost of projects included in the Creamery Road DCP, the exhibited Development Infrastructure Levy rate of $823,453 per net developable hectare was significantly lower than the August 2024 figure of $1,599,840 per net developable hectare.

13. The updated draft amendment was put out for public consultation between 17 December 2025 to 9 February 2026, during which time 28 submissions were received.

14. On 16 February 2026, Council under delegation referred the unresolved submissions to the Minister for Planning in accordance with Clause 20 of the NWGGA SAC Terms of Reference.

15. Further revisions were made to the Draft Amendment documents in response to submissions from landowners, developers and agencies, to address the recommendations made by the NWGGA SAC and incorporate directions from the Minister for Planning.

16. The SAC's report was released in July 2026 and is available online at the PPV website and Council's C450 draft amendment webpage – refer to **Attachment 1** for the executive summary.

Key Matters

17. Overall, the SAC provided strong support for the draft Amendment.

18. The SAC provided support for Council's spatial plan for the Precinct (refer to **Attachment 4**), including Council's preferred locations for active open space and the neighbourhood activity centre.

19. The SAC found that the draft Amendment strikes the right balance between providing sufficient developable land and ensuring that appropriate infrastructure is available to support future communities living in the precinct. The SAC was satisfied that the extent of developable land has been appropriately maximised since the Referral 1 process.

20. The SAC found that the overall rate of the DCP Levy is appropriate, subject to some refinements.

21. The SAC found that the Cowies Creek conservation buffer was generally appropriate and concluded the relationship with the *Environment Protection and Biodiversity Conservation Act* (EPBC Act) strategic assessment process could be suitably managed with appropriate drafting.

22. The SAC found the proposed drainage infrastructure as generally appropriate with agreed improvements and refinements to Basins 6 and 7.

23. The SAC identified that certain transport infrastructure designs and costings needed to be reviewed to ensure they were appropriate to accommodate future growth.

24. The SAC recommended various minor drafting changes which can be incorporated. Overall, drafting changes in response to submissions and SAC recommendations have substantially reduced the number of provisions in the PSP, offering developers more flexibility while ensuring the PSP can still deliver on its objectives.

25. Council officer's consideration of the SAC's findings is set out in **Attachment 2** and a table summary of Council's responses to the SAC's recommendations is included at **Attachment 3**.

26. In summary, Council officers support the vast majority of the SAC's recommendations.

27. Council officers do not fully accept the recommendation for further strategic transport modelling which is considered unnecessary given the detailed assumptions of previous modelling combined with recent additional transport intersection design work undertaken. Council officers do not fully accept the recommendation to further expand the scope of the DCP in relation to Bridge 1 (northern approach road), noting the likely major increase to the DCP levy from this global item.

28. Council officers are now finalising the draft C450ggee documentation in response to the findings and recommendations in the *NWGGA Standing Advisory SAC Referral 2 Report Vols 1& 2* (1 July 2026).

29. The officer-accepted SAC recommendations for PSP and DCP refinements have both increased and decreased DCP costs (noting further refinements to net developable area), resulting in an estimated generally neutral cost impact to the exhibited draft DCP rate of $823,453 per net developable hectare (costed to July 2025).

30. A working draft DCP, which incorporates the officer-agreed SAC changes to DCP items able to be finalised to date, is provided at **Attachment 6**. Limited further work is underway on the final arterial intersection designs and costings, and final planning cost calculations. This work is expected to be completed by late August / early September 2026, and the resultant costs will be included in the final draft DCP.

31. It is recommended that the draft Amendment C450 (refer attached) is endorsed and following finalisation of documentation, is submitted to the Minister for Planning to request approval.

Recommendation

That Council:

1. **Adopts the draft Creamery Road Precinct Structure Plan (Attachment 5) and draft Development Contributions Plan (Attachment 6), generally in accordance with the drafts attached to this report;**

2. **Authorises the Executive Director Growth & Place to:**

   2.1 Finalise the Creamery Road Precinct Structure Plan, Creamery Road Development Contributions Plan, and the associated planning scheme amendment documentation for Amendment C450ggee, generally in accordance with the drafts attached to this report;

   2.2 Submit Amendment C450ggee, together with the finalised Precinct Structure Plan, Development Contributions Plan, Native Vegetation Precinct Plan, and all relevant ordinance and incorporated documentation, to the Minister for Planning; and

   2.3 Request that the Minister for Planning approve Amendment C450ggee pursuant to section 20(4) of the Planning and Environment Act 1987.

Financial Sustainability

32. It is proposed to apply a DCP to the Creamery Road precinct to fund specific local infrastructure. The PSP and DCP have been prepared by the City. Preparation of these documents was mostly funded through third party funding agreements with major landowners. Planning costs, such as fees paid to consultants to complete technical assessments that inform the PSP and DCP, are included in the DCP levy. This means that these planning costs will be recovered by the City and third-party funders when developers undertake subdivision and development.

33. The total DCP infrastructure cost is approximately $241 million, of which it is anticipated approximately $170 million will be recovered under the Creamery Road DCP. These figures are likely to marginally increase once Council officers finalise updates in response to the SAC's Recommendation 4c, including:

    33.1. Design updates and associated re-costing of arterial intersections IN_01, IN_03, IN_04, IN_05 and IN_06.

    33.2. Updates to planning costs once all further work has been completed to account for fees incurred in the processing of the draft amendment since November 2025.

34. The DCP does not cover delivery of all infrastructure in the precinct. The monies not apportioned to the Creamery Road DCP will be covered under future DCPs or apportioned to Council. As at 30 July 2026, project costs apportioned to the City (i.e. not recovered by the CRDCP and requiring City funds in the future) are estimated at ~$5.4 million (costed to July 2025) due to:

    34.1. Partial apportionment of the Myers Reserve Extension (DI_OS_01) estimated at $2,048,700.

    34.2. Partial apportionment of community infrastructure, estimated at approximately $3.4 million, noting the Community Infrastructure Levy (CIL) rate is capped.

35. The DCP will become an incorporated document in the planning scheme which would legally bind Council to the provisions of the plan.

36. The DCP levy is significantly lower than as specified in August 2024, at roughly half the cost per net developable hectare. This is due to the removal of several transport, drainage, and community infrastructure projects, and a refinement of the scope of costings. This reduction in projects reduces the burden on Council to deliver projects, and the associated risk of that delivery demand.

37. The SAC found no evidence that, as exhibited at $823,453 per net developable hectare, the levy would negatively impact development feasibility.

38. Greater Geelong will benefit from the economic growth generated in the short-medium term through the construction of the precinct and in the longer term through the precinct's commercial areas. The precinct will contribute to Geelong's supply of housing that is well connected to jobs and services.

39. Contributions towards community facilities in the Creamery Road precinct will also apply in the form of a Community Infrastructure Levy consistent with section 46L of the *Planning and Environment Act 1987*.

40. The DCP will enable the collection of contributions from developers to ensure that identified infrastructure can be funded and provided. The City will act as the collecting agency and may deliver the infrastructure or enter into agreements with developers to deliver this infrastructure through works-in-kind and land contributions.

Community Engagement

41. The draft amendment has undergone multiple rounds of engagement, including two referrals to the Ministerially-appointed NWGGA SAC (see Table 1).

42. Table 1. Overview of engagement on draft Creamery Road PSP & DCP

Date	Engagement	Outcomes
May 2022	Initial Agency Consultation	Updates to Future Place Based Plan
Mar 2023	Landowner Consultation	Further work on drainage and transport studies which lead to refined plans and technical reports.
Apr to May 2025	SAC Referral 1	Further work on drainage, open space, and transport which lead to: • a 15-hectare increase in NDA; • a halving of the DCP levy; and • increase in predicted dwelling yield and population.
Nov 2025 to Feb 2026	Formal Public Consultation	Further work on conservation area, drainage, and zoning.
Apr to May 2026	SAC Referral 2	Refinement of DCP costings and drafting matters.

43. The first referral SAC sat in April-May 2025. Against the request of Council officers, the Minister directed that the scope of the notification for this referral be limited to those parties directly affected. It was attended by a number of developers (including those with land holdings in NWGGA precincts other than Creamery Road), agencies, and residential landowners. The purpose of this referral was to identify opportunities for increasing the Net Developable Area (NDA) and reducing the DCP levy.

44. Further work then commenced, in consultation with key developers, that included the adoption, with review, of Batesford Property Pty Ltd's (Villawood) tabled drainage network and core transport infrastructure.

45. The second referral SAC sat in April-May 2026, after a period of public consultation, and was attended generally by the same parties. The focus of this referral was the matters unresolved from submissions received during consultation. In an unusual arrangement, Villawood were given the chance to present a closing statement to the SAC.

46. Council officers are satisfied that there has been sufficient and rigorous consultation with developers and other stakeholders in the preparation of the amendment, and that the SACs to which now two subsequent drafts of the amendment have been referred is well-equipped to ensure a balanced consideration of all parties' views.

Social Equity and Sustainability

47. The PSP contains significant social equity considerations, to accommodate Greater Geelong's significant growth rate and plan for the future provision of affordable housing and employment opportunities that meet community needs.

48. The PSP will guide development in a manner that addresses the City's responsibility to deliver vibrant, walkable neighbourhoods with high amenity, access to community facilities, environmental sustainability, abundant open space, and activity centres that provide daily needs and jobs for residents.

49. The PSP will provide for community facilities, a public primary school, public parks and reserves, the revegetation of Cowies Creek and the establishment of active transportation links and public transport all of which will provide social benefit to the existing and future community. The existing community facilities within the PSP area were considered in its preparation, particularly to allow for future expansion as needed due to the increased catchment that will utilise the school.

50. Provisions facilitating the voluntary contribution of affordable housing in the precinct will help Geelong remain a vibrant and connected city of opportunity, increasing the chances for young workers or families to own a home close to their established social networks, in a location that is well serviced with jobs and services.

51. Protection and enhancement of Wadawurrung cultural heritage is an important objective for the PSP. The final PSP takes into account findings and recommendations of the Cultural Values Assessment (CVA) and Aboriginal Cultural Heritage Impact Assessment (ACHIA) completed in 2023, as well as input from the Wadawurrung Traditional Owners Aboriginal Corporation (WTOAC) who are the Registered Aboriginal Party (RAP) for this area.

Gender Equality – Gender+ Impact Assessment

52. A Gender Impact Assessment was not undertaken during the preparation of the draft Amendment or its associated documents as it does not meet the requirements of the *Gender Equality Act 2020*. The report does not involve new or reviewed policies, programs or services, and it does not have a direct or significant impact on the public.

Relevant Law/Policy/Legal Implications

53. The Northern and Western Geelong Growth Areas are identified in state, regional and local policy as growth areas including in the G21 Regional Growth Plan. Council adopted a Settlement Strategy in October 2018 which highlights the importance of the growth areas in supporting Geelong's long term land supply.

54. The Settlement Strategy and NWGGA Framework Plan were adopted into the Greater Geelong Planning Scheme through Amendment C395. The amendment was gazetted on 6 May 2021.

55. Input from relevant policy areas in Victorian Government agencies was sought and has been taken into account in preparing the Creamery Road PSP. This included regular input and guidance from the Victorian Planning Authority (VPA), Department of Energy, Environment and Climate Action (DEECA), Department of Transport and Planning (DTP), Department of Education (DoE), Environment Protection Authority

(EPA) Victoria, Corangamite Catchment Management Authority (CCMA) and Barwon Water.

56. The draft amendment is prepared under the *Planning and Environment Act 1987.* Under Section 151 of the Act, the Minister for Planning appointed a SAC to advise on matters related to draft amendments in NWGGA.

Alignment to Council Plan and Vision

57. This report aligns with the Council Plan 2025-29 strategic priority:
Core and Critical Infrastructure
Economic Development
Environment and Circular Economy

58. This report aligns with the Community led 30-year Vision, “Greater Geelong: A Clever and Creative Future” community aspiration:
A fast, reliable and connected transport network.
A prosperous economy that supports jobs and education opportunities.
An inclusive, diverse, healthy and socially connected community.
Development and implementation of sustainable solutions.
Sustainable development that supports population growth and protects the natural environment.

Conflict of Interest

59. No officer involved in the preparation of this report declared a general or material conflict of interest.

Risk Assessment and Risk Appetite Statement

60. The recommendation aligns with Council’s cautious appetite for Regulatory, Legal and Governance risks by implementing appropriate rezoning, overlays and other planning controls in a location identified for future development through the statutory planning scheme amendment process and supporting consistent, transparent decision-making.

61. The recommendation also aligns with Council’s balanced appetite for Community risks by enabling the development of areas while protecting amenity and ensuring community infrastructure, to create a planned future sustainable residential community. Failure to proceed would result in a lack of developable residential and commercial land, limiting the area’s growth potential and putting undue pressure on other areas.

62. By reducing the scope of projects in the DCP since the previous version adopted in August 2024, it relieves the burden on Council to deliver as many infrastructure projects without compromising the serviceability of the precinct. City funds will be required in the future where DCP project costs are apportioned to the City.

63. There is a risk that, should the Creamery Road PSP not be adopted, the City will not achieve the anticipated land supply for this growth area. This will detrimentally impact the City’s ability to retain a 15-year supply of residential land across the municipality.

Environmental Sustainability

64. Environmental implications have been considered as part of the preparation of the PSP. Technical studies relating to the capability of land including assessments of native flora and fauna, Aboriginal and post-contact heritage, geotechnical, hydrogeological, and environmental constraints, stormwater drainage, noise assessment, bushfire risks and land use buffers have been completed.

65. The PSP identifies actions to protect biodiversity including an overarching biodiversity conservation strategy, protection of conservation areas, tree canopy coverage targets, significant tree retention and tree planting.

66. A key objective of the PSP is to protect significant environmental and landscape values including the Cowies Creek Conservation Area and key views identified in the Framework Plan.

67. The PSP includes provisions that will contribute to environmentally sustainable design and the City's zero carbon objectives.

68. The Creamery Road NVPP has an important role as it summarises the biodiversity values across the precinct; applies a holistic, landscape wide approach to retention and removal of native vegetation; and ensures that areas retained for the protection of native vegetation are managed to conserve ecological values in accordance with the relevant strategies and assessments for the precinct.

Attachments

1. NWGGA SAC Referral 2 (Creamery Road) Executive Summary [**2.5.1** - 10 pages]
2. Consideration of C450ggee Committee Report [**2.5.2** - 17 pages]
3. Response to NWGGA SAC Referral 2 Report Recommendations [**2.5.3** - 7 pages]
4. Creamery Road Future Place Based Plan [**2.5.4** - 2 pages]
5. Draft Creamery Road Precinct Structure Plan (August 2026) [**2.5.5** - 177 pages]
6. Draft Creamery Road Development Contributions Plan (August 2026) [**2.5.6** - 55 pages]

Executive summary

Greater Geelong City Council (Council) prepared draft Greater Geelong Planning Scheme Amendment C450ggee (Amendment) for land in the Creamery Road precinct (precinct), which is the first precinct to be planned in the broader Northern and Western Geelong Growth Areas.

The Amendment seeks to incorporate the following into the Greater Geelong Planning Scheme (Planning Scheme):

- Creamery Road Precinct Structure Plan (PSP)
- Creamery Road Development Contributions Plan (DCP)
- Creamery Road Native Vegetation Precinct Plan (NVPP).

Specifically, the Amendment proposes to:

- apply Urban Growth Zone Schedule 8 (UGZ8)
- apply Development Contributions Plan Overlay Schedule 11 (DCPO11) and the Parking Overlay Schedule 2 (PO2) to all land within the precinct
- apply the Heritage Overlay to two properties
- apply the Environmental Audit Overlay (EAO) to potentially contaminated land
- ensure urban development in the precinct is undertaken in a manner consistent with the NWGGA Environment Protection and Biodiversity Conservation Plan (EPBC Plan) and supporting documents (prepared under the EPBC Act).

Creamery Road precinct

The precinct is bounded by Geelong Ring Road, Midland Highway, Geelong-Ballan Road and the Ballarat Geelong railway and has an area of approximately 350 hectares.

The Future Urban Structure Plan in UGZ8 shows the structure of planned land use and development within the Creamery Road precinct. There were several iterations of the Future Urban Structure Plan presented during the process, the Committee's recommendations are based on Council's Final Future Urban Structure Plan (Figure 1).

Figure 1 Council's Final Future Urban Structure Plan for the precinct

Source: Council's Final Future Urban Structure Plan

Committee's role and Referred Matters

The Committee has been appointed under Terms of Reference dated 28 October 2022.

This report relates to Referral 2 to the Committee. Referral 1, in January 2025, sought pre-exhibition advice about certain aspects of the Amendment, including whether the amount of developable land had been appropriately maximised. The Amendment was adjusted in light of the Referral 1 advice and placed on public exhibition from December 2025.

This second referral, by letter dated 1 March 2026 (Referral letter), asked the Committee to consider and provide advice on specific matters relating to the revised Amendment (Referred Matters). In considering the Referred Matters, the Committee has had regard to the Referral 1 report where appropriate and relevant.

This Executive Summary focusses on the Committee's advice on the key Referred Matters discussed at the Hearing. The Committee has considered all Referred Matters in the Report and its finding for all Referred Matters are summarised in Table 1.

The key Referred Matters include:

- location and size of the Neighbourhood Activity Centre (NAC) on the Future Urban Structure Plan
- location of Active Open Space Reserve 2 (Reserve 2) on the Future Urban Structure Plan
- apportionment of the Batesford South PSP bridge BR_01 (Bridge 1) in the DCP
- intersection and road design for DCP projects
- project costings (including Bridge 1) in the DCP
- extent of developable land on the Future Urban Structure Plan
- extent of the Cowies Creek conservation buffer on the Future Urban Structure Plan
- requirements and provisions in the UGZ8 and PSP relating to the strategic assessment process under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act)
- design and configuration of drainage assets Basin 6 and Basin 7 on the Future Urban Structure Plan.

Neighbourhood Activity Centre

The Committee supports the location and size of the NAC as shown on Council's Final Future Urban Structure Plan. The NAC should be located on the corner of the east-west connector road and the Clever and Creative Boulevard (CCB) and have an area of 4 hectares. This location will meet the broader strategic objectives for the precinct and best serve the needs of future communities within the precinct.

As identified in the Northern & Western Geelong Growth Areas Framework Plan, the relationship between the NAC and the CCB is strategically important and should remain a key organising principle of the PSP.

The Committee acknowledges Villawood's submissions regarding visibility, exposure and commercial viability as beneficial to the early delivery of the NAC. However, the stated benefits of early delivery were broad and lacked a measurable comparison that would

enable the Committee to place greater emphasis on commercial viability over broader strategic considerations.

Active Open Space Reserve 2

The Committee supports the location of Reserve 2 as shown on Council's Final Future Urban Structure Plan.

This location provides the most equitable distribution of active open space to service the future community. It provides superior walkability and accessibility outcomes, delivers a more equitable distribution of active open space across the precinct, reduces reliance on future facilities outside the PSP area and appropriately balances housing delivery with community infrastructure provision.

Apportionment of Bridge 1

Exclusion of Bridge 1 from the DCP is beyond the scope of the Referred Matters. Bridge 1 has already been identified as a global item that is required to serve the Western Growth Area, and this precinct needs to contribute to the cost of that bridge. There is sufficient certainty that the bridge will be required.

The level of design information is generally sufficient for the purpose of informing the DCP, subject to the Committee's recommended further work on costings being completed.

The apportionment of Bridge 1 to the precinct should be 11.96 percent.

Road and intersection design

The Committee was asked for advice on appropriateness of the intersection and road designs in the DCP. The Committee finds:

- The arterial intersections may be under-designed and hence underfunded due to outdated traffic modelling and not meeting the requirements of the Head, Transport for Victoria.
- The traffic modelling should be updated and the arterial intersections and Intersection 7 re-analysed and re-costed before finalising the DCP.
- The review should include both a roundabout option and signalised option for Intersection 7, assessing the potential benefit for a roundabout to reduce costs and bus travel times.
- The design of Intersections 9 and 12 is appropriate and it is acceptable to fund the signal works for these intersections through the DCP.
- The design of Evans Road requires further work but this can be completed following the adoption of the Amendment.
- The scope of Bridge 1 design should be expanded to consider the inclusion of the northern approach road.

DCP project costings

Council has undertaken sufficient work in reviewing and reducing DCP projects costings (following Referral 1 process), except in relation to Bridge 1. Council was the only party who presented evidence in relation to road costings, and the Committee supports the costings presented by Mr Funke.

Further work is required to confirm the cost of Bridge 1. The cost of Bridge 1 needs to be reviewed, taking into account the inclusion of an appropriate length of the northern road approach (which is inextricably linked to the design of Bridge 1). In addition, the cost of Bridge 1 should be calculated on the basis of the P90 value (90 percent confidence levels for project budgets based on statistical risk analysis).

Extent of developable land

Generally, the Future Urban Structure Plan strikes the right balance between providing sufficient developable land and ensuring that appropriate infrastructure is available to support future communities living in the precinct. The Committee is satisfied that the extent of developable land has been appropriately maximised since the Referral 1 process.

Cowies Creek conservation buffer

The Cowies Creek conservation buffer is generally appropriate, subject to some minor adjustments on the Yih-Sheng land at 200 Geelong-Ballan Road (Property 1).

On the Yih-Sheng land, the Committee supports a narrower buffer to the south of Cowies Creek, generally aligning with the EPBC Act approval for that land. The Committee does not support a change to the buffer to the north of Cowies Creek. Based on the information currently available, it would be premature to designate the land in the north-eastern corner of the Yih-Sheng land as developable. However, the Committee recommends the Future Urban Structure Plans should identify this as an area for further investigation.

Relationship with the EPBC Act strategic assessment process

The Committee acknowledges that development in the precinct cannot progress until all relevant approvals are in place, including approval under the EPBC Act. There is a spatial aspect to the commitments made in the Draft EPBC Plan which may have an impact on the form of future permit applications – for example a change in the boundary of an offset area could impact on land in the precinct that is currently identified as developable.

On this basis the Committee thinks it is reasonable to include a requirement in UGZ8 for a proponent to explain how a permit application is consistent with any relevant EPBC Act approval. This could be a site-specific Part 9 approval or a future strategic Part 10 approval held by Council. Landowners seeking to rely on Council's Part 10 approval in the future would need to satisfy the Council that it can meet any obligations under that approval.

Drainage infrastructure

The Committee found that the size, configuration and location of Basin 6 and Basin 7 as shown on the Council's Final Future Urban Structure Plan is appropriate.

It is appropriate to accommodate a split basin arrangement at Basin 6, however no change is required on the Future Urban Structure Plan.

Basin 7 can be redesigned as a sediment basin to reduce the size and cost of the asset. This may result in a change to the Future Urban Structure Plan – but the nature of the

change will need to be confirmed once the design is settled, as such no change to the Future Urban Structure Plan at this time.

Recommendations

Based on the reasons set out in this Report, the Committee makes the following recommendations in relation to the Referred Matters:

Creamery Road Future Urban Structure Plan

1. **Amend the Final Creamery Road Future Urban Structure Plan (Document 126) as follows:**
   a) **Show the northern and southern Local Convenience Centres in the locations on the Exhibited Future Urban Structure Plan, and at a size of 1,000 square metres each.**
   b) **Retain Community Parks 6 and 7 as one-hectare parks.**
   c) **Show a 'potential' left-in/left-out intersection on Midland Highway between Geelong Ballan Road and the Clever and Creative Boulevard, with an access street extending north to Creamery Road.**
   d) **Reduce the extent of the green hatched 'Cowies Creek Conservation' area to 50 metres (measured from the edge of bank) on the southern side of Cowies Creek on the land at 200 Geelong-Ballan Road, Moorabool.**
   e) **Designate the north-eastern corner of Properties 1, 2 and 3 (Yih-Sheng land) (north of Cowies Creek) as 'potential developable land subject to future investigation'.**
   f) **Delete the red line described as '100-metre buffer to Cowies Creek'.**

Creamery Road Precinct Structure Plan

2. **Amend the Final Creamery Road Precinct Structure Plan (Document 141) as follows:**
   a) **Replace the Future Urban Structure Plan with the amended plan revised in accordance with Recommendation 1.**
   b) **Change the title of Table 4 to 'Dwelling Density Targets' and update references within Requirement 9 to reflect this change.**
   c) **Revise Guideline 14 to read as follows:**
      Gating or other measures that restrict public access to streets, parks, pedestrian or cycling connections should be avoided.
   d) **Delete Design Intent 11, 17, 18 and 21 from Appendix 5.**
   e) **Delete the Design Principles (Table 24) from Appendix 5 and make any consequential changes arising from the deletion of Table 24.**
   f) **Update Design Intent 1 in Appendix 5 as follows:**
      Provide a high-quality visual and physical connection through the NAC to public realm features, such as the town square and the Clever and Creative Boulevard.
   g) **Update Design Intent 5 in Appendix 5 as follows:**
      Provide a diverse mix of retail, office and commercial uses at ground floor level.
   h) **Update Design Intent 10 in Appendix 5 as follows:**

Provide active frontages and avoid blank facades along the Key Pedestrian Street, Town Square and the CCB. Street based retail centre designs are preferred. Internalised mall designs should be avoided.

i) Amend Table 6 to increase the retail and commercial floor space to reflect an overall Neighbourhood Activity Centre size of 4 hectares and Local Convenience Centres of 1,000 square metres each.

j) Delete Guideline 38 (bicycle charging facilities).

k) Update requirements 86, 88 and 89 in the Creamery Road Precinct Structure Plan to enable some discretion when assessing setback requirements and vegetation management standards.

l) Delete references that specify the need to comply with the strategic assessment under Part 10 of the *Environment Protection and Biodiversity Conservation Act 1999*.

m) Revise Requirement 66 to read as follows:

All lots must be connected to:

- ***A safe and reliable potable water supply and sewerage services; and***
- ***A reticulated recycled water system to provide for the supply of recycled water from a suitable scheme for toilet flushing, washing machine use and outdoor use including lawn and garden watering, unless otherwise agreed by the responsible authority and Barwon Water.***

<u>Creamery Road Development Contributions Plan</u>

3. Undertake the following additional work before the Creamery Road Development Contributions Plan is finalised:

a) Update the traffic modelling to account for the increase in Net Developable Area and redistribution of traffic based on the amended Future Urban Structure Plan revised in accordance with Recommendation 1.

b) Re-design and re-cost Intersections 1, 3, 4, 5, 6 and 7 (including the alternative of a roundabout for Intersection 7) in light of the updated traffic modelling.

c) Expand the scope of Bridge 1 to include an appropriate length of the northern approach road (the length will be informed by the review of costings as recommended in Chapter 4.3).

d) Review the cost of Bridge 1 taking into account:

- **The cost of integrating an appropriate length of the northern road approach into the scope of the project.**
- **Adopting a P90 value (90 percent probability-based confidence level) as the basis for the costing.**

4. Amend the Final Creamery Road Development Contributions Plan (Document 128) as follows:

a) Update the description of BR-01 in the DCP as follows:

Delivery of Batesford South PSP bridge (arterial road - Lynnburn Road over Moorabool River) - interim bridge for arterial road extension of Lynnburn Road over Moorabool River (including an appropriate length [insert X metres as determined by the further work in Recommendation 3(d)] of the northern road approach).

b) Update the project costings for Bridge 1 in accordance with the revised costings prepared under Recommendation 3(d).

c) Update any other project costings to account for any other consequential changes arising from the Committee's recommendations in this Report.

<u>Creamery Road Native Vegetation Precinct Plan</u>

5. Undertake the following additional work before finalising the Creamery Road Native Vegetation Precinct Plan:

a) Confirm the native vegetation condition scores which informed the plan are accurate.

6. Amend the Creamery Road Native Vegetation Precinct Plan as follows:

a) Include an expiry date.

b) Delete any reference to the strategic assessment under Part 10 of the *Environment Protection and Biodiversity Conservation Act 1999* and replace with a reference to "*any approval under the Environment Protection and Biodiversity Conservation Act 1999*".

c) Any consequential changes required following the completion of further work identified in recommendation 5.

<u>Schedule 8 to the Urban Growth Zone</u>

7. Amend the Final Schedule 8 to the Urban Growth Zone (Document 142) as follows:

a) Replace the Future Urban Structure Plan at Plan 1 with the amended plan revised in accordance with Recommendation 1.

b) Amend Clause 2.3 (Section 1 – Permit not required) to increase the combined leasable floor areas for shops within the Commercial 1 Zone to reflect an overall Neighbourhood Activity Centre size of 4 hectares.

c) Amend Clause 3.0 (Application requirements) to delete the requirement to provide a Zero Carbon Operational Energy Plan and Circular Economy Plan.

d) Amend Clause 3.0 (Application requirements) to delete the following:

Despite the above, the responsible authority may determine that a Preliminary Risk Screen Assessment Statement is not required in relation to an application to use or subdivide land, construct a building, or construct or carry out works for or associated with a new sensitive use (residential use, child care centre, kindergarten, pre-school centre, primary school, children's playground, and secondary school) where a suitably detailed Preliminary Site Investigation has been provided which, to the satisfaction of the responsible authority, adequately assesses land contamination risks and demonstrates the suitability of the land for the proposed sensitive use.

e) Amend Clause 4.0 (Conditions and requirements for permit) to:

- **Delete reference to land at 10 Evans Road, Bell Post Hill (1\LP203190) and 85-105 Bluestone Bridge Road, Bell Post Hill (1\PS403299) from the environmental audit condition.**
- **Delete the following from the environmental audit condition:**
  All the recommendations of the environmental audit statement must be complied with to the satisfaction of the Responsible Authority, prior to commencement of use of the site. Written confirmation of compliance must be provided by a suitably qualified environmental consultant or other suitable person acceptable to the responsible authority. Compliance sign off must be in accordance with any requirements in the environmental audit statement recommendations regarding verification of works.

f) Amend Clause 3.0 (Application requirements) to delete the requirements relating to bushfire risk, and replace with the following provision:

An application for subdivision of land adjoining bushfire hazard areas identified on Plan 23 in the Creamery Road PSP must include a perimeter road between the bushfire hazards area and future development, except where it has been demonstrated to the satisfaction of the responsible authority that site constraints make such roads impracticable and alternative bushfire protection measures are provided.

g) Insert the following at Clause 3.0 (Application requirements):

A report demonstrating that the proposal is in accordance with any relevant approval or draft approval under the Environment Protection and Biodiversity Conservation Act 1999

Certificate of Acknowledgement of Consent

An application to subdivide land, construct a building, or construct or carry out works must be accompanied by a Certificate of Acknowledgement of Consent recording agreement with the City to rely on the Northern and Western Geelong Growth Areas EPBC Plan approval under Part 10 of the Environment Protection and Biodiversity Conservation Act 1999 except where there is an intention to rely on a proposed or existing approval under Part IX of that Act.

h) Insert a new decision guideline at Clause 6.0:

Whether the application is generally in accordance with the draft EPBC Plan or any relevant approval under the Environment Protection and Biodiversity Conservation Act 1999.

i) Delete Condition – Commonwealth Biodiversity Developer Implementation Plan at Clause 4.0.

j) Revise the specific provisions for the Cowies Creek Conservation Area at Clause 2.4 to read as follows:

Any proposed subdivision within or directly adjacent to the Cowies Creek Conservation Area as shown in Plan 17 Biodiversity & Threatened Species of the Creamery Road PSP.

k) Revise the specific provisions for the Cowies Creek Conservation Area at Clause 2.5 to read as follows:

Any proposed development (including earthworks, paths, in-stream pools, ephemeral soaks, street furniture or other infrastructure works) within or directly adjacent to the Cowies Creek Conservation Area as shown in Plan 17 Biodiversity & Threatened Species of the Creamery Road PSP.

l) Delete any other remaining references the specify the need to comply with Part 10 of the Environment Protection and Biodiversity Conservation Act 1999.

m) Amend Clause 2.5 (Recycled Water) to read as follows:

A building must be connected to a reticulated recycled water supply system, or a rainwater tank of minimum 2kL or an alternative grey water recycling system scheme, for toilet flushing, washing machine use and outdoor use including lawn and garden watering, unless otherwise agreed by the responsible authority and Barwon Water.

Council Consideration of the Greater Geelong Draft amendment C450ggee Committee Report

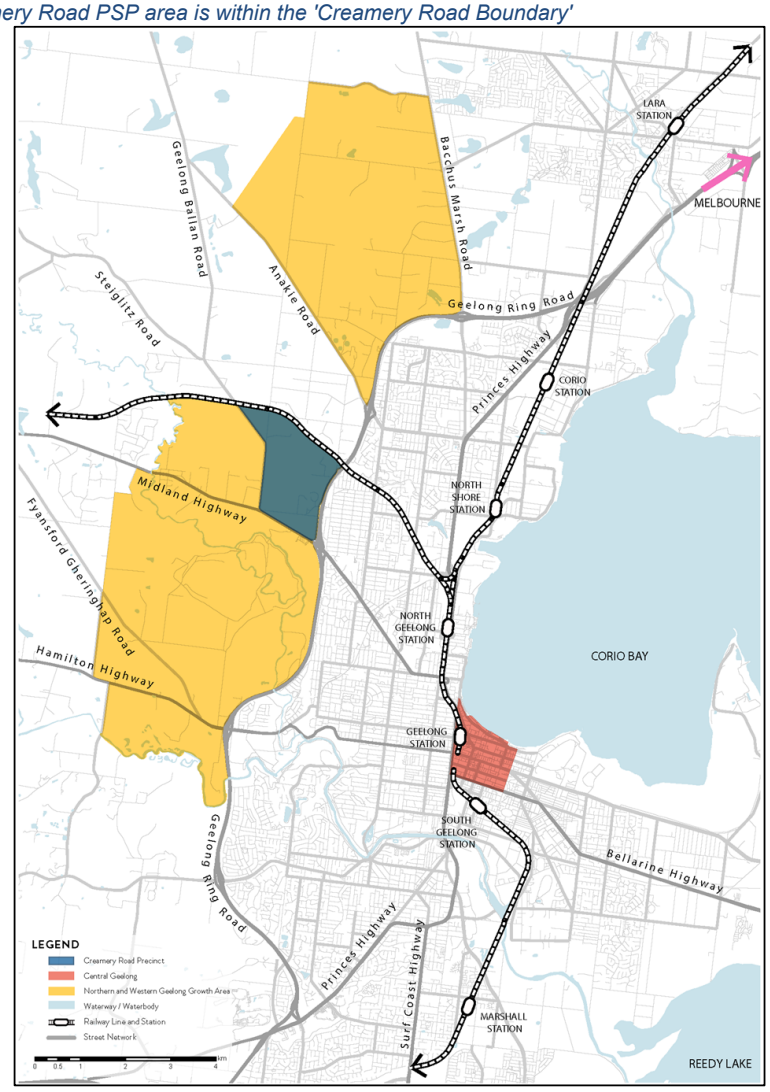
Background to the amendment

1. The Northern and Western Geelong Growth Area Framework Plan (Framework Plan) guides development of the area to provide housing for upwards of 112,000 residents. The Northern and Western Geelong Growth Area (NWGGA) is the largest urban growth project in regional Victoria. It includes both the Northern Geelong Growth Area and the Western Geelong Growth Area.

2. The amendment seeks to facilitate residential development in the Creamery Road Precinct. The Creamery Road Precinct is the first precinct proposed to be developed as part of the Western Geelong Growth Area (WGGA). It is understood that the WGGA, when developed, is anticipated to deliver approximately 22,000 new dwellings and house a population exceeding 60,000 persons. Creamery Road Precinct covers 345 hectares (see Figure 1) and is expected to accommodate approximately 4,200 dwellings housing around 11,770 residents.

3. Structure plans for other NWGGA precincts, including the Elcho Road East Precinct in the Northern Geelong Growth Area, are currently under preparation.

Figure 1. Creamery Road PSP area is within the 'Creamery Road Boundary'



4. The Amendment seeks to facilitate the development the Creamery Road Precinct by incorporating the Creamery Road Precinct Structure Plan (City of Greater Geelong, November 2025). The

Amendment applies the Urban Growth Zone Schedule 8 (UGZ8) and makes ordinance and mapping changes to support implementation of the Creamery Road PSP.

5. The Amendment also applies the Development Contributions Plan Overlay Schedule 11 (DCPO11) and the Parking Overlay Schedule 2 (PO2) to land within the precinct; applies the Heritage Overlay to two properties; applies an Environmental Audit Overlay (EAO) to potentially contaminated land; and incorporates the Creamery Road Development Contributions Plan (November 2025) and Creamery Road Native Vegetation Precinct Plan (June 2024).

6. The Amendment proposes measures to ensure that urban development within the Northern and Western Geelong Growth Areas is undertaken in a manner consistent with the NWGGA Environment Protection and Biodiversity Conservation Plan (EPBC Plan) and supporting documents.

7. More specifically, the amendment recommended for adoption makes the following changes to the Greater Geelong Planning Scheme:

   7.1 Applies Urban Growth Zone Schedule 8 (UGZ8) and map to the Creamery Road Precinct Structure Plan land area;

   7.2 Applies Development Contributions Plan Overlay Schedule 11 (DCP11) and map to the Creamery Road Precinct Structure Plan land area;

   7.3 Applies Schedule 2 to the Parking Overlay (PO2) to all properties;

   7.4 Applies the Heritage Overlay (HO) map to two properties;

   7.5 Applies the Environmental Audit Overlay (EAO) map to two properties;

   7.6 Amends various relevant schedules to add or amend references to newly introduced documents; and,

   7.7 Incorporates the following documents:

      () *Creamery Road Precinct Structure Plan* (City of Greater Geelong, July 2026);

      (a) *Creamery Road Development Contributions Plan* (City of Greater Geelong, July 2026);

      (b) *Creamery Road Native Vegetation Precinct Plan* (Biosis, June 2024);

      (c) HO2026 Avonlea Homestead Statement of Significance (City of Greater Geelong, November 2025) HO2027 Coolangatta Homestead Statement of Significance (City of Greater Geelong, July 2026)

   7.8 Adds the following as background documents:

      () *Northern and Western Geelong Growth Areas Draft Biodiversity Conservation Strategy* (City of Greater Geelong, November 2025);

      (a) *Northern and Western Geelong Growth Areas Draft Commitments and Measures* (City of Greater Geelong, November 2025);

      (b) *Northern and Western Geelong Growth Areas Draft EPBC Plan* (City of Greater Geelong, November 2025);

      (c) *Northern and Western Geelong Growth Areas Draft Strategic Assessment Funding Program* (City of Greater Geelong, November 2025);

      (d) *Northern and Western Geelong Growth Areas Draft Strategic Assessment Report (Biosis and Open Lines, November 2025).*

Preparation of the draft amendment

8. The City's work on this ambitious project has been guided by a combination of internal resources, leading external consultancies and formal/informal agency and stakeholder consultation. The preparation of the Creamery Road PSP has been guided by the Framework Plan. While the plan does deviate in some areas where a localised response proved more appropriate, the Creamery Road PSP is generally in accordance with the Framework Plan and its objectives.

9. The City prepared an early draft of the Creamery Road PSP which was for public consultation with agencies, landowners, and representatives in early 2023. Initial submissions indicated the DCP levy was considered high and so officers undertook further technical work in mid-2023 to revise the scope of the PSP and associated DCP. The updates from this work informed the preparation of the August 2024 draft of the Creamery Road PSP & DCP.

10. On August 27 2024, Council endorsed the preparation of the draft amendment for the Creamery Road Precinct Structure Plan, Creamery Road Development Contributions Plan, and associated documents.

11. Minister for Planning is the Planning Authority for the amendment. The Minister has appointed a Standing Advisory Committee under Part 7, section 151 of the *Planning and Environment Act 1987* to advise on referred planning matters associated with draft planning scheme amendments in the growth areas. Therefore, the procedures associated with the preparation of the draft amendment are in accordance with the Northern and Western Geelong Growth Areas Standing Advisory Committee Terms of Reference dated 28 October 2022.

12. In accordance with the Terms of Reference, Council officers requested the Minister's consent to exhibit the draft amendment the week following the Council resolution. The Minister elected in January 2025 to refer the draft amendment to the Standing Advisory Committee for an initial review to ensure the Creamery Road draft amendment "will provide for a balanced development outcome, including consideration of its ability to provide for efficient land use, maximise development opportunities and provide for the timely delivery of development" (Minister's Letter of Referral, 4 January 2025).

13. The Committee sat in April 2025 and considered submissions and the evidence of experts in drainage, transport, planning, urban design, community facility and costing matters.

14. Key issues raised during the hearing included:

    14.1 The extent of land nominated as encumbered for drainage, transport, open space, and community facility uses.

    14.2 The high cost of the DCP levy.

15. The Committee released its Referral 1 report in two volumes:

    15.1 NWGGA Standing Advisory Committee Referral 1 Report – Volume 1 (Creamery Road Precinct Structure Plan and Development Contributions), 21 May 2025. This report made recommendations on opportunities to increase the NDA and reduce the DCP, including the reduction of the drainage network, reducing the scope of included transport projects, and reviewing the provision of open space.

    15.2 NWGGA Standing Advisory Committee Referral 1 Report – Volume 2 (Creamery Road Precinct Structure Plan and Development Contributions), 20 June 2025. This report made further recommendations supplementary on state transport infrastructure items.

16. In response to the Committee's recommendations, Council officers in consultation with key stakeholders, including developers, completed a suite of further work between June and November 2025 and made the below consequential changes to the Creamery Road PSP & DCP:

    16.1 Significantly reduced the land take and cost of the drainage system by moving drainage assets 'on line' and reviewing the sizing and efficiency of other assets across the network;

    16.2 Redesignated the CCC in the precinct between IN_12 and Midland Highway to the Clever and Creative Boulevard, a lower order spur line of the CCC which no longer has separated bus lanes or sections which exclude private vehicle traffic;

    16.3 Reduced the extent of land encumbered for community uses by removing the proposed 3-hectare non-government primary school and reducing the land for the Early Years & Community Hub (CF_01) by 0.3-hectares;

    16.4 Revised and reduced the open space contribution;

    16.5 Made consequential changes to the number and content of the drafted provisions;

    16.6 Revised and reduced the scope of projects in the DCP.

    16.7 Note: the letter from the Minister for Planning on 9 November 2025 directed the variation of the Committee's recommendations in relation to state infrastructure items, including that

100% of costs for land within Creamery Road PSP needed for Midland Highway widening DI_RD_03_L (LA_03) be apportioned to the Creamery Road DCP.

17. This resulted in:

    17.1 an increase to the net developable area of 15+ hectares.

    17.2 a reduction in the development infrastructure levy per hectare by almost half.

18. This change represents a significant amount of work and resources by Council officers, in conjunction with developers and agencies.

19. The version of the draft amendment which subsequently went on public consultation from December 2025 had a net developable area of 210.22 hectares (61% of the precinct) and a Development Infrastructure Levy (DIL) of $823,453.91.

Submissions and Council consideration of submissions

20. On 26 November 2025, Council officers requested the Minister's consent to exhibit the updated draft amendment in accordance with Item 16 of the NWGGA SAC Terms of Reference. The Ministers' delegate consented to the request on 8 December 2025 and public consultation commenced on 17 December 2025 and closed on 9 February 2026.

21. A total of 28 submissions were received to the exhibited draft amendment, including 3 late agency submissions. Of the 28 submissions, 23 requested a change or changes to the amendment. Of those submissions requesting changes, 1 was resolved during the consideration of submission period.

22. The submissions are summarised as follows:

    22.1 Agency submissions from Barwon Water, Corangamite Catchment Management Authority, Department of Transport and Planning (Transport), Environment Protection Authority, Country Fire Authority and Department of Energy, Environment and Climate Action generally supported the amendment but objected to certain elements or requested some changes. Requested changes included adjustments to drafting and plans to better address matters including integrated water management, biodiversity, and the transport network.

    22.2 Resident landowner submissions requested a variety of minor changes to items on their properties, including infrastructure and application of amenity area. All 3 resident landowners of properties proposed to include WLRB07 requested a review of the configuration and location of the drainage asset.

    22.3 Submissions from developers within the precinct generally acknowledged the changes in the exhibited material made in response to the Committee's recommendations. Submitter 15, a landowner in the precinct, presented an alternate Future Urban Structure Plan and DCP for consideration. This alternate plan includes a number of consequential changes including: a larger NAC sited further to the west, between Geelong-Ballan Road and the Clever and Creative Boulevard (CCB); relocation of the active open space reserve from Property 12 to Properties 24, 25, 26, 27, and 28. Submitter 15's proposed an alternative DCP which varies the scope of infrastructure included, as well as to costing of items.

    22.4 Submissions from developers external to the precinct raised concerns around apportionment of global infrastructure items, and precedents set in regards to road design, conservation, and other policy matters through the work on the Creamery Road PSP.

    22.5 The developer submissions also raised concerns around development feasibility with the current NDA and DCP. The City has worked extensively over the past months to exhibit a Draft Amendment with an increased NDA and reduced DIL while ensuring the delivery of a thriving, well connected and climate resilient neighbourhood.

23. The key issues were grouped under the following themes: (1) PSP land uses; (2) transport network; (3) biodiversity; (4) transport design and costing; (5) drainage asset WLRB_07; and (6) drafting.

24. On 16 February 2026 after considering the submissions, in accordance with the NWGGA SAC Terms of Reference, Council under delegation requested the Minister for Planning to refer all submissions to the Committee, excluding the four submissions already resolved with parties.

25. The draft amendment was referred to the Committee by the Minister for Planning on 1 March 2026. Three members were appointed to sit on the Committee for this referral.

Discussion – consideration of Committee report

26. A 12-day Committee Hearing was held in April and May 2026, including two days at Council's Geelong office. All parties who requested to be heard successfully participated in the hearing. Council was represented by Harwood Andrews Lawyers.

27. The Committee considered all written submissions, undertook a site visit and read a large volume of technical reports. At the Hearing, the Committee had the benefit of expert evidence in the fields of economics, traffic, drainage, open space, town planning, urban design, community infrastructure, ecology, and environmentally sustainable development.

28. The Committee Report was received by Council officers dated 1 July 2026. The Minister consented to its public release on 10 July 2026, at which time it was published on the Planning Panels Victoria website and submitters were notified.

29. The Committee report was generally supportive of the exhibited version of draft amendment C450ggee, including the Creamery Road PSP & associated documentation. It expressed support for Council's preferred active open space location on Property 12 and Council's preferred location for the Neighbourhood Activity Centre (NAC) on the corner of the Clever and Creative Boulevard and an east-west connector road. It made key recommendations in relation to transport and costing matters, and other minor recommendations in relation to drafting of various documents

30. The Committee Report noted that the further work undertaken since the Referral 1 hearing to find opportunities to increase the NDA in the precinct 'represents a significant and positive outcome' and 'a material improvement in the efficient use of land while maintaining the delivery of the key infrastructure, community facilities and environmental outcomes required to support the future community' (pp38).

31. This report recommends that the amendment be adopted in the form recommended by the Committee other than as stated in this report.

CITY RESPONSE TO COMMITTEE REPORT

32. This section of the report summarises the issues identified in the Committee Report and provides a City response to the Committee's conclusions and recommendations.

33. The Committee Report considered referred matters only; and only made findings and recommendations on aspects of the draft amendment that are relevant to referred matters. Key referred matters addressed in the report include:

    33.1 The location and size of the Neighbourhood Activity Centre (NAC)

    33.2 The location of Active Open Space Reserve 2 (SR_02)

    33.3 Design and costing of transport items

    33.4 The extent of net developable land in the precinct

    33.5 The extent of the Cowies Creek conservation buffer

    33.6 Requirements and provisions in the UGZ8 and PSP relating to the strategic assessment process under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)

    33.7 The design and configuration of drainage assets Basin 6 and Basin 7

    33.8 Changes to the Native Vegetation Precinct Plan (NVPP)

34. The Committee report is structured by key amendment document. This report groups and discusses the Committee's findings by the following themes:

    34.1 Activity Centres

    34.2 Open Space

34.3 Transport

34.4 Biodiversity and Cowies Creek

34.5 Development Infrastructure Levy

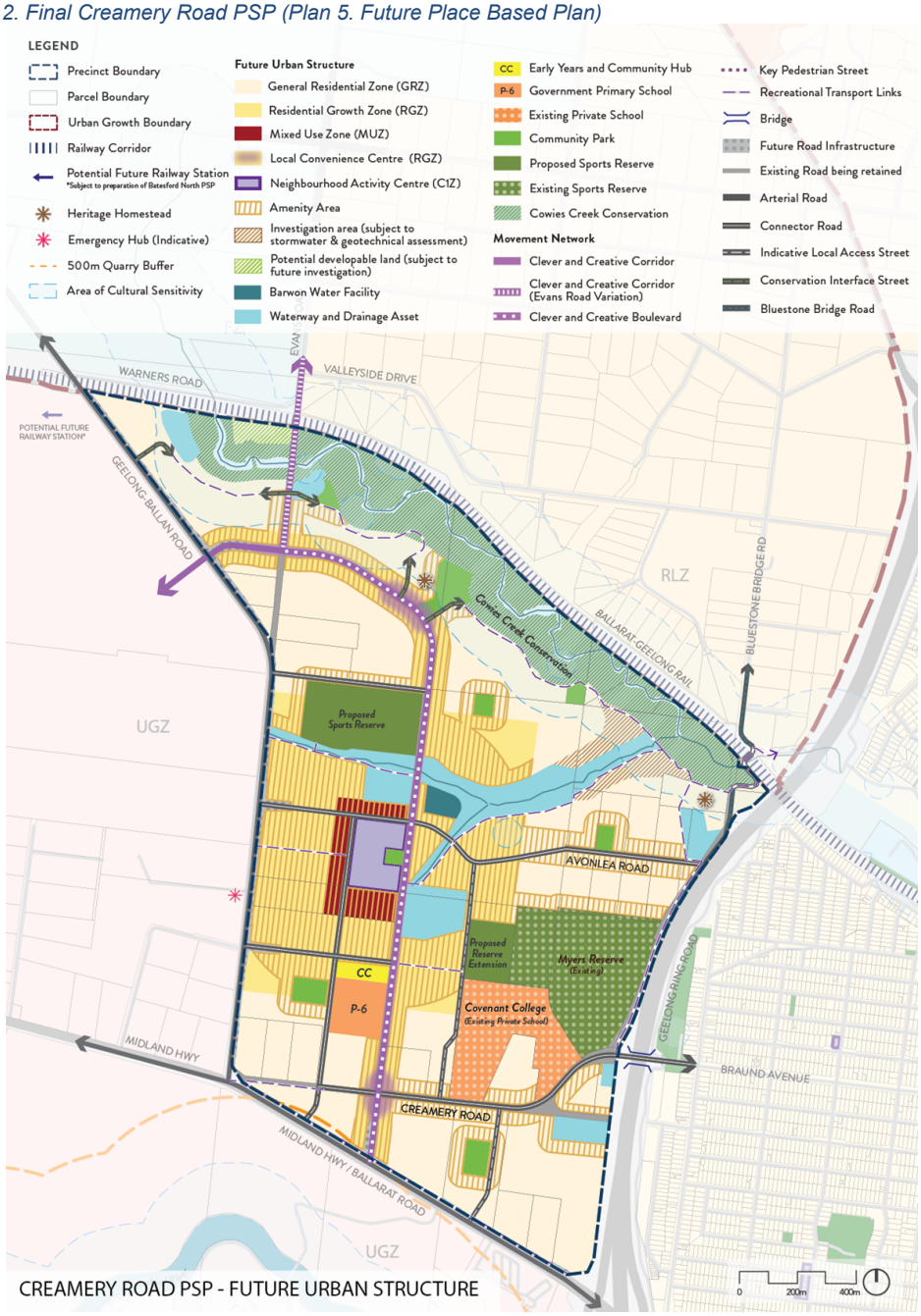
34.6 Net Developable Area (NDA)

34.7 Drafting

34.8 Other matters

35. The report refers to land uses which correlate with the Creamery Road Precinct Future Place Based Plan - see Figure 2.

Figure 2. Final Creamery Road PSP (Plan 5. Future Place Based Plan)



Activity Centres

36. The Committee was generally supportive of Council's preferred location of the Neighbourhood Activity Centre (NAC) and Local Convenience Centres (LCC).

37. The Committee found that:

    37.1 the proposed 4-hectare Neighbourhood Activity Centre (NAC) located on the corner of the Clever and Creative Boulevard (CCB) and east-west connector road is appropriate;

    37.2 the NAC should be the primary commercial designation in the precinct;

    37.3 retaining both the northern and southern Local Convenience Centres (LCCs) is consistent with planning principles to improve local-scale access to conveniences; and,

    37.4 the LCCs should be reduced to 1,000sqm to ensure NAC viability is not compromised.

38. The Committee also notes, incorrectly, that increasing the size of the NAC to 4-hectares will reduce the NDA by 1.3-hectares.

39. The Committee also considered the drafting of the PSP as it relates to the future development of commercial spaces and recommended the deletion of Table 23. Design Principles. See paragraphs 124-125.

Council officer response:

40. Council generally agrees with the Committee's findings in regards to the NAC and LLCs.

41. The amount of leasable floor area in the NAC has been increased to a total of 10,000sqm, and the LLCs proportionally reduced to 1,000sqm each in response. The PSP also contains provisions requiring any commercial development proposed outside the designated centres to submit an economic feasibility report to demonstrate the proposal would not negatively impact the commercial viability of the NAC and LCCs.

42. However, Council disagrees with the Committee's assertion that increasing the size of the NAC to 4-hectares will reduce the NDA.

43. Net developable area (NDA) is all land in the precinct that is not encumbered. Land in the Neighbourhood Activity Centre, which has an applied zone of Commercial 1 Zone, is not encumbered. Its applied zone facilitates residential uses in conjunction with commercial uses, and such uses are encouraged through the various provisions in the PSP. It is anticipated that the NAC may facilitate the delivery of between 80-90 dwellings in forms such as apartments and shop top housing.

Open Space

Active Open Space Reserve (SR_02)

44. The Committee recognised that Council had undertaken significant background work to identify and test various locations for the sports reserve to determine the location and configuration best able to meet the needs of the future population of the Creamery Road precinct.

45. The Committee determined that while the delivery of open space might be physically accommodated at either Council's preferred location or adjacent to the northern boundary of the existing Myers Reserve, the options should be analysed as to which best implements the strategic objectives of the PSP, responds to the PSP Guidelines, and provides the most equitable outcome for the future community.

46. The committee found that:

    46.1 Benefits attributed to the Myers Reserve co-location are dependent on the future provision of active open space in the Batesford North Precinct, the timing, location and sizing of which are yet to be determined through future planning processes.

    46.2 While both locations achieve T12 of the PSP 2.0 Guidelines (VPA, 2021), Council's preferred location 'better implements the accessibility objectives of the PSP Guidelines by providing a more centralised and equitable distribution of active open space across the precinct' (pp.60).

46.3 The benefits of co-locating the new sports reserve with the existing Myers Reserve were overstated and that any potential operational efficiencies that may arise are insufficient to outweigh the accessibility and locational advantages of Council's preferred location.

46.4 The assumption that an active sports reserve located on Property 12 would function only as a satellite facility of Myers Reserve sporting clubs is unfounded, and that the reserve could operate independently of existing sporting facilities.

46.5 Submissions from landowners who would be affected by the proposal adjoining Myers Reserve indicate there would likely be additional costs and delays associated with delivery of an active sports reserve in this location.

47. The Committee supports the location of the active open space reserve (SR_02) on Property 12, as proposed in Council's exhibited PSP (see Figure 2), noting this location 'provides superior walkability and accessibility outcomes, delivers a more equitable distribution of active open space across the precinct, reduces reliance on future facilities outside the PSP area and appropriately balances housing delivery with community infrastructure provision' (pp.14).

Council officer response:

48. Council agrees with the Committee's assessment of the appropriateness of the exhibited location of the active open space reserve (SR_02) on Property 12; particularly in regards to its ability to best provide equitable access, serve the future Creamery Road community, and contribute to a wider network of open spaces within the growth area.

49. The Committee's support for Council's preferred location will support the timely delivery of an active sports facility for the future population of the Creamery Road population, for which the land acquisition and construction costs are appropriately accounted in the DIL.

Quantum of Open Space

50. The Committee found that one hectare community parks provide greater flexibility to accommodate a broader range of recreational functions, informal play opportunities and community activities than smaller fragmented parks, and therefore did not support Submitter 18's proposal to reduce local park CP_07 from a single 1-hectare park into multiple smaller parks.

51. The Committee determined that the quantum of unencumbered open space in the Creamery Road precinct should remain at 8.64%, noting also that the overall accessibility, functionality and recreational opportunities available to future residents in this context can justify a passive open space provision of 2.9%, despite that being below the PSP Guidelines target.

52. The Committee found that the distribution of open space in Council's FUS:

52.1 responds to the findings of Referral 1;

52.2 is strategically justified as it is consistent with T12 distributions targets in the PSP Guidelines;

52.3 maintains the overall quantum of passive open space while improving equity outcomes for affected landowners and access to local open space for future residents;

52.4 appropriately balances open space outcomes with broader precinct planning objectives.

53. The Committee concluded that both the quantum and distribution of unencumbered open space in the draft amendment is appropriate, noting that where responses to other recommendations may increase the overall NDA, the percentage of open space contribution should be maintained.

Council officer response:

54. Council agrees with the Committee's findings and supports the recommendation that where other changes may increase the overall NDA, the percentage of open space contribution is maintained.

55. The predicted NDA in the precinct is approximately 212 hectares. The public consultation version included 6.279 hectares of credited open space for local community parks (equivalent to 2.99% of the NDA). However, despite the increase in NDA, of which the land for local community park equates to roughly 2.96%, it is not proposed that an additional park be added to the precinct.

56. Council prefers 0.5-hectare parks at a minimum, yet the existing distribution of open space across the precinct is appropriate. Furthermore, the difference in percentage contribution is minimal.

Transport

Batesford South Bridge (BR_01)

57. The Committee found that the apportionment of 11.96% to the Creamery Road DCP for this transport project was appropriate but that costing for the bridge should be adopted at a P90 probability due to the early concept nature of the design which informs it.

58. The Committee found that the scope of Bridge 1 design could be expanded to include an appropriate length of the northern road approach but that there was insufficient material presented to them at the hearing to determine the indicative cost impact of this addition.

Council officer response:

59. Council agrees that the costing of Batesford South Bridge (BR_01) can be updated from a partial P50 probability to a P90 probability with limited impact on the DCP, noting however that this project is a long-term project and probabilities at this stage can provide conceptual information only. See also "**Development Infrastructure Levy**" (para. 90).

60. Council disagrees that it is appropriate to add another project in the form of the northern approach road to the Batesford South Bridge (BR_01). Construction of first carriageway to a bridge is a standard developer-provided element, and should not form a part of the DCP.

61. The addition of another project increases the risk to Council, who is compelled to deliver the DCP listed items. This project in particular would have a significant financial impact on the DCP levy, adding more than $50k per net developable hectare.

62. Inclusion of this project not only adds unnecessary cost to the Creamery Road DCP, but to every subsequent DCP in the Western Geelong Growth Area. The conceptual nature of the current design and costing is likely to evolve at the future point at which it is constructed.

63. Where the costs exceed those gathered via the DCP, as is probable, the cost burden to deliver this road project on a future state arterial road would rest with Council. That is a level of risk that is not compatible with the Minister's direction to ensure development feasibility for this precinct and for all subsequent WGGA precincts.

Further modelling and intersection design work

64. The Committee stated that the precinct population has increased by 40% since the original traffic modelling completed in 2023, and recommended completion of further transport modelling work.

65. The Committee found that the designs of various transport projects should be reviewed. They recommended the designs for arterial road intersections IN_01, IN_03, IN_04, IN_05, and IN_06 be reviewed with updated modelling. This is to account design modifications requested by HTfV for road network changes and an increase in NDA since the original model was prepared.

66. They recommended the design of Intersection IN_07 be reviewed with updated modelling and consider the benefits of both a non-DCP funded roundabout and a DCP funded signalised intersection.

67. The Committee also found that the road design for the Evans Road culvert is appropriate for costing purposes and can be further refined during the subdivision process.

68. The Committee supported the costing evidence of B. Funke, which will underpin the final intersection costings in the precinct. See also "**Development Infrastructure Levy**" (para. 92).

Council officer response:

69. Council disagrees that further modelling is needed. Modelling that informed exhibited designs accounted for increase in NDA since original modelling and distribution of traffic via amended road network.

70. Council has been working consistently with the Head, Transport for Victoria, to resolve their submission leading up to and since the hearing, and is satisfied that the designs as exhibited, subject to the conclusion of agreed refinements currently underway and the costings as per the evidence presented at the hearing, are sufficient to inform the DCP.

71. While the street network internal to the precinct has evolved since the original modelling which informed the adopted August 2024 draft, the function and volumes of the intersections with arterial roads remain generally consistent.

72. The modelling completed in 2024 assumed a population of 10,200+. This figure has influenced the design of the intersections included in the public consultation version.

73. In consultation with Head, Transport for Victoria (HTfV), Council officers reached agreement that there does not to be a significant scope of additional modelling done. Rather, the inputs for SIDRA modelling completed in 2025 should be reviewed to confirm the correct population assumptions are accounted for, and that this updated model should inform the changes to the designs of arterial intersections outlined in the following paragraphs.

74. Updates are underway to update the design of arterial intersections IN_01, IN_03, IN_04, IN_05 & IN_06) in accordance with changes agreed between the City and HTfV.

75. It should be noted that intersections on arterial roads are generally state delivered items. In fact, it was the recommendation of the previous Committee during Referral 1 to only partially apportion the costs to of IN_05 and associated state infrastructure items to the Creamery Road DCP. However, prior to exhibition, on 9 November 2025 the Minister directed Council to include costs for state infrastructure items in the Creamery Road DCP.

76. Changes to the design of internal intersection IN_07 are not supported. Signals ensure bus prioritisation along the Clever and Creative Boulevard (CCB), supporting the objectives set out in local policy and the NWGGA Framework Plan. Furthermore, the cost imposition of the DCP item is relatively small as only the cost of signals, rather than construction of the entire intersection, is apportioned to the DCP, at a total cost of $818,368.43 (approximately $3,858 per net developable hectare).

Biodiversity and Cowies Creek

77. The Committee found that there is clear policy at a state level to protect biodiversity values, often through the designation of conservation land to protect or create habitat for protected species, and that state biodiversity values are adequately protected through the Cowies Creek Conservation Area and the NVPP.

78. While the Committee acknowledged that development in the precinct cannot progress until all the relevant EPBC Act approvals are in place, it concluded that it is premature to closely tie the precinct's development outcomes to commitments in an EPBC plan that has not yet been approved.

79. However, the Committee also found that there remains a spatial relationship between the commitments in the Draft EPBC Plan (City of Greater Geelong, November 2025) and land uses within the precinct, such as the Cowies Creek Conservation Area. It found that references to an approval under EPBC Act is proportionate but that any provision in the draft amendment should not duplicate requirements under a separate act.

80. The Committee also found that there were opportunities to clarify drafting in the UGZ schedule to avoid confusion for applicants. See paragraph 120.

Council officer response:

81. Council acknowledges the Committee's findings and agrees with the recommended drafting changes.

82. Council maintained that the EPBC Act addresses similar but not identical matters to the Planning and Environment Act 1987, under which this draft amendment is prepared, and that while a federal approval under the EPBC Act might inform a planning decision about appropriate land use, such approvals should not be the only consideration to determine the most appropriate use of a piece of land. Local and state level conservation matters, including in this case the protection of waterways in accordance with Clause 12.03 (Water bodies and wetlands) of the Greater Geelong Planning Scheme, must also be balanced in the decision, as well the capability of a piece of land to support conventional development.

Development Infrastructure Levy

83. The Committee found that there was no evidence presented by any party to indicate that development would not be feasible based on the exhibited Development Infrastructure Levy rate of $823,453.91 per net developable hectare (NDHa).

84. The Committee highlighted that the levy rate cannot be considered in isolation of other policy considerations, stating:

    "Economic considerations associated with delivery of the precinct in the short term, do not negate the need to consider the infrastructure needs to support medium to long-term economic, social and environmental benefits for future communities.

    It is important to ensure that infrastructure to support future communities is appropriately funded, the Committee is satisfied that the Levy proposed by Council strikes an appropriate balance." (pp.111).

85. The Committee concluded that the draft Creamery Road Development Contributions Plan:

    85.1 Shows sound methodology;

    85.2 Is appropriately supported by relevant costing materials;

    85.3 Does not preclude development feasibility at the exhibited rate;

86. The Committee noted the levy will be subject to further refinement in response to the Committee's other recommendations.

Council officer response:

87. Council continued to work with submitters ahead of the hearing and in response to expert evidence to identify additional opportunities to reduce the levy. The following opportunities were identified and implemented:

    87.1 Revision of the per metre costing of shared paths to accord with the VPA benchmark costings, resulting in an approximate levy reduction of $1,783 per NDHa;

    87.2 Further revision of drainage assets, resulting in an approximate combined levy reduction of $10,000 per hectare (excluding savings from reduced land costs associated with the new designs);

    87.3 Adoption of the transport costing evidence presented by B. Funke, resulting in an approximate combined levy reduction of $15,000 per NDHa;

    87.4 Revision of the floor area needs of the Early Learning Centre and Community Hub, resulting in an approximate levy reduction of $15,758.37 per NDHa.

88. Proposed changes which will significantly increase the levy, such as the inclusion of land costs for all arterial intersections, are not supported. However, as discussed above, Council agrees that it is appropriate to adopt the P90 probability costs for BR_01, which will result in an approximate increase to the levy of $17,875.84 per NDHa.

89. As outlined in paragraph 61 above, the inclusion of the northern road approach to BR_01 is not supported as it will likely add at minimum $50k per NDHa to the Creamery Road DCP levy. See also "**Batesford South Bridge BR_01**" (paras. 59-60).

90. Implementation of the Committee's recommendation to re-design and re-cost intersections regarding transport infrastructure is still being finalised. Where intersection elements are added or increased in size, it can be anticipated that the project cost will also moderately increase.

91. Updated designs for arterial intersections will need to be re-costed in accordance with the evidence of B. Funke. As discussed at paragraphs 61-62, changes which would result in a large increase to the DCP levy are not supported.

92. The details of the DCP are subject to finalisation of transport infrastructure redesign and costings, expected by end of August 2026.

93. Any outstanding changes in accordance with Council officer recommendations are likely to result in a levy generally within the range of the exhibited rate which the Committee determined will not affect development feasibility.

94. Council agrees with the Committee's finding the exhibited levy strikes an appropriate balance between economic, social, and environmental outcomes at the timescale of the PSP. Through the process of the hearing (changes outlined at paragraph 87) and the updates in response to the Committee's recommendations, it is anticipated the impact on the DCP levy compared to the exhibition rate will be relatively cost neutral.

Net Developable Land (NDA)

95. In response to the recommendations from the Referral 1 Report, Council officers undertook further work to identify and implement opportunities to increase the amount of net developable area (NDA) in the precinct.

96. The NDA includes all land not needed for drainage, open space, transport, community or conservation uses (the 'encumbered' land uses). It includes all land with the applied zone of Commercial 1 Zone, Mixed Use Zone, Residential Growth Zone and General Residential Zone. The NDA informs the predicted dwelling and population yield of the precinct – an increase to the NDA results in an equivalent increase in the predicted population. The NDA also influences the Development Infrastructure Levy (DIL) as the total cost of projects assigned to the catchment area, i.e. the precinct, are split by the number of developable hectares.

97. The NDA for Creamery Road Precinct in the exhibited draft PSP was 61%. Two submitters requested changes that could further increase the proportion of NDA in the precinct. It was Council's position that further substantial increases in NDA would be difficult to achieve without compromising the delivery and quality of the relevant community and open space assets.

98. The Committee found that the significant gains in NDA achieved in the wake of the Referral 1 recommendations represented 'a material improvement in the efficient use of land while maintaining the delivery of the key infrastructure, community facilities and environmental outcomes required to support the future community' (pp.42).

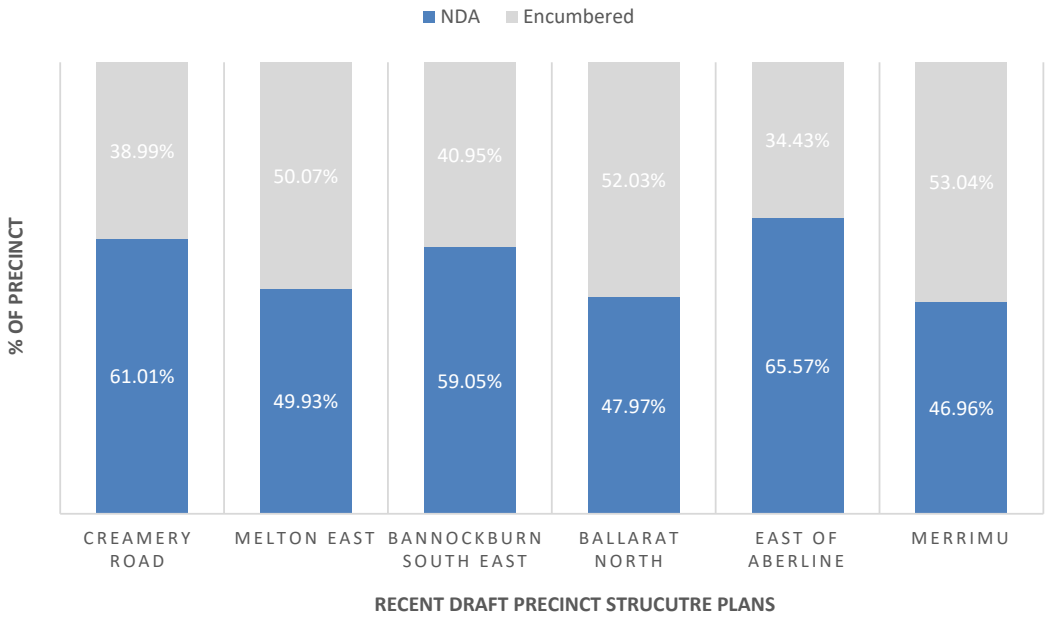
99. The Committee concluded any further increases to NDA in response to submissions would be modest, but acknowledged that its recommendations in relation to various other matters might impact the overall NDA.

Council officer response:

100. Council agrees that the exhibited NDA for the precinct at 210.22 hectares (61% of the total precinct) is appropriate. It represents an additional 15 hectares compared to the August 2024 version (195.717 hectares).

101. A comparison with other precinct structure plans prepared by the VPA and put out for public consultation in the past 18 months indicates the percent of NDA delivered at Creamery Road is on par if not exceeding that proposed in other precincts. See Figure 3.

Figure 3. Comparison of % of NDA in recent draft PSPs



102. Council also agrees that while there may be some scope to increase the NDA in fractional amounts in response to the submissions, such increases would be incidental.

Reduction of the Cowies Creek Buffer

103. Minor changes to the extent of the Cowies Creek Conservation Area across the north of the precinct have resulted a small increase to the NDA. This is inclusive of changes agreed during the consideration of submissions in February, and in response to the Committee's findings from the hearing in regards to the land in Property 1.

104. Council has agreed to the Committee's recommendation that the land in Property 1 to the north of Cowies Creek be identified on the Future Place Based Plan as "Potential developable land (subject to further investigation)" however it is premature to include this land in the NDA calculations at it remains as encumbered for the purposes of calculated the DCP levy.

105. Compared to the adopted August 2024 draft, an additional 0.69 hectares has been extracted from the Conservation Area to contribute to the total NDA.

106. Further reduction of the Cowies Creek Conservation Area is not supported, even where extents of federal approvals may differ, as it risks compromising the integrity of local and state biodiversity values.

Changes to Drainage Basin Design

107. Adjustments to the designs of two drainage assets in the precinct which were adopted through consultation with submitters prior to, during, and after the hearing process have resulted in a minor increase of approximately 0.6-hectares to the NDA.

108. Drainage Basin 6 was split into two basins; WLRB_06 (Wetland Retarding Basin on Property 45; 1.4-hectares) and SRB_06a (Sediment Retarding Basin on Property 42; 0.3-hectares. This resulted in a nominal NDA increase of approximately 0.1-hectares but can assist the deliverability of the Basin 6 asset and its outfall into the Geelong Ring Road.

109. Drainage Basin 7 was changed from a wetland retarding basin type asset to a sediment basin type. Council has set aside 1.6-hectares for this asset to account for detailed design refinements at the planning permit stage to appropriately account for nitrogen treatment through the asset which outfalls into Cowies Creek. This reduced the asset location from three properties to two,and added approximately 0.5-hectares to the NDA.

Other

110. The Committee made comment that increasing the NAC to 4-hectares will decrease the NDA. However, this is not the case. The applied zone for the NAC is Commercial 1 Zone and, as discussed at paragraph 42 above, therefore part of the NDA. Changes to the extent of the NAC have no impact on the precinct's overall NDA.

111. Through the above changes, subject to finalisation of the intersection designs, the current NDA sits at approximately 212 hectares (61.6% of the total NDA).

Drafting

112. While the Committee did not directly consider drafting matters as they were beyond the scope of the referred matters, they made a number of drafting recommendations resultant from their findings on other referred matters.

Future Urban Structure

113. Recommendations 1a-f propose amendments to the Future Urban Structure Plan, which in turn underpins the majority of other maps in the structure plan. The recommendations support Council's preferred sizing of Community Parks 6 and 7 at 1-hectare each, encourage the reinstatement of some elements removed during the consideration of submissions process, and propose minor changes to the Cowies Creek Conservation Area.

114. Recommendations 1a-f have been implemented in **Attachment 4**.

Creamery Road Precinct Structure Plan

115. Recommendations 2a-l propose amendments to the drafting of provisions in the Creamery Road Precinct Structure Plan. The recommendations serve to remove redundancies and ensure controls are balanced rather than over-prescriptive. They propose minor changes to provisions including the drafting NAC provisions, bushfire vegetation management, and EPBC Act overlap.

Creamery Road Development Contributions Plan

116. Recommendations 4a-c propose amendments to drafting of the Creamery Road Development Contributions Plan, including the renaming of BR_01 and updating relevant costings in the DCP document.

Creamery Road Native Vegetation Precinct Plan

117. Recommendations 4a-c propose amendments to drafting of the Creamery Road Native Vegetation Precinct Plan, generally as per changes requested by submitters. Proposed minor changes include the addition of an expiry date and redrafting of references to approvals sought under the EPBC Act.

Schedule 8 to the Urban Growth Zone

118. Recommendations 7a-m propose minor drafting changes to Schedule 8 to Clause 37.07 Urban Growth Zone (UGZ8). The recommended changes include updates to bushfire, zero carbon, and biodiversity provisions.

Council officer response:

119. Council does not contend the drafting changes outlined in Recommendations 1a-f (Changes to the Future Urban Structure Plan); 2a-d and 2f-m (Changes to the PSP); 4b-c (Changes to the DCP); 6a-c (Changes to the NVPP); and 7a-m (Changes to Schedule 8 to the Urban Growth Zone).

120. These changes have been incorporated into the final versions of the respective amendment documentation.

121. However, Recommendation 2e (Delete the Design Principles (Table 24) from Appendix 5 and make any consequential changes arising from the deletion of Table 24) is not supported. While Council agrees with the Committee's findings that the table as drafted includes duplication of policy found elsewhere in the planning scheme, the table serves an important function to link those guiding principles found elsewhere to specific outcomes sought in the Creamery Road Precinct.

122. Rather than deleting the table, it has been revised and significantly overhauled and simplified. Duplications have been removed and the elements retained as discretionary examples of how an outcome might be achieved rather than a proscriptive list. See also **Attachment 5**.

123. The drafting change in Recommendation 4a is redundant and not supported – see "**Batesford South Bridge BR_01**" (paras. 59-63).

Other findings

124. The Committee made a number of findings on referred matters for which it did not make explicit recommendations. Nevertheless, their findings are useful for the preparation of subsequent PSPs.

Affordable housing

125. A number of submitters put that the drafting of the affordable housing provisions in the August 2024 and the exhibited (November 2025) versions of the Creamery Road PSP were too prescriptive and insufficiently clear about being voluntary rather than mandatory.

126. The provisions were reviewed at each of these stages, and the Committee found that drafting of provisions relating to affordable housing provided in the final hearing version are appropriate and cannot be considered to be inflexible or requiring a fixed delivery mechanism.

127. The Committee found that the revised affordable housing provisions:

127.1 Promote affordable housing in high amenity areas;

127.2 Support voluntary delivery mechanisms;

127.3 Provide a measurable affordable housing target; and

127.4 Offer clear guidance while maintaining flexibility.

Council officer response:

128. Council welcomes the Committee's support for the drafting of affordable housing provisions. This reflects significant work from Council officers to review and respond to submissions and contemporaneous examples to ensure an equitable and implementable outcome in the Creamery Road precinct.

129. The provisions to facilitate voluntary delivery of affordable housing will enable developers to support and enrich the diversity of Geelong's housing market and support the delivery of affordable housing in well-located areas close to jobs, employment, and community facilities.

Environmentally Sustainable Design & Smart Cities

130. The Committee found that rather than being 'novel' or 'non-standard' as some submitters had posited, provisions in the PSP which talk to Environmentally Sustainable Design (ESD) matters are consistent with the current planning policy context which increasingly seeks to consider climate change factors.

131. It found that the proposed provision for Residential ESD Guidelines is an acceptable mechanism to bridge the current policy gap between the National Construction Code and planning policy in the context of a PSP for the urban growth zone (UGZ).

132. The Committee did not support the inclusion of application requirements for zero carbon assessments in the urban growth zone schedule.

133. The Committee determined it is appropriate to specify a requirement for smart city infrastructure in the UGZ schedule and PSP. It supported Council's drafting of these provisions, noting 'as climate policy evolves smart city infrastructure will be important to support the transition to a lower emission future. This infrastructure is justified in the same way that drainage or road infrastructure is, and as such developers are expected to contribute' (pp.131).

Council officer response:

134. Council welcomes the Committee's support for including residential ESD and smart city provisions. Council agrees with the Committee's findings that there is sufficient strategic justification to include provisions in the PSP & UGZ which address climate change matters.

135. Recent amendments to the Act introduced an objective for planning frameworks to explicitly consider policies and obligations relating to climate change when decisions are made about the use and development of land.

136. It is an explicit purpose of the planning scheme, in which the Creamery Road PSP sits, to support responses to climate change (Clause 01.01 of the Greater Geelong Planning Scheme).

CITY RESPONSE TO COMMITTEE'S RECOMMENDATIONS

137. In general, the City accepts the Committee's recommendations with the exception of:

137.1 **Recommendation 2e.** Delete the Design Principles (Table 24) from Appendix 5 and make any consequential changes arising from the deletion of Table 24.

Deletion is not supported. Instead, the table content has been streamlined and duplications removed. See paragraphs 122-123.

137.2 **Recommendation 3a.** Update the traffic modelling to account for the increase in Net Developable Area and redistribution of traffic based on the amended Future Urban Structure Plan revised in accordance with Recommendation 1.

Full remodelling is not required. In consultation with Head, Transport for Victoria, it has been agreed that review of the SIDRA modelling is sufficient. See paragraphs 69-73.

137.3 **Part Recommendation 3b.** Re-design and re-cost Intersections 1, 3, 4, 5, 6 and 7 (including the alternative of a roundabout for Intersection 7) in light of the updated traffic modelling.

Re-design of IN_07 as a roundabout is not supported, and therefore further work has not been completed for this element. See paragraph 76.

137.4 **Recommendation 3c.** Expand the scope of Bridge 1 to include an appropriate length of the northern approach road (the length will be informed by the review of costings as recommended in Chapter 4.3).

Inclusion of a northern approach road to BR_01 is not supported.

137.5 **Recommendation 4a.** Update the description of BR-01 in the DCP as follows: […]

As per the above, the change to the scope of project BR_01 is not supported, and therefore any associated change to the name of the project is redundant.

138. A summary the Committee's recommendations in their Referral 2 Report and the City's responses are outlined in **Attachment 3**.

Next steps

139. In parallel with the preparation for the August Council meeting, officers will continue to finalise work associated with the planning scheme amendment. While every effort has been made in the timeframe available to ensure the documentation in the attachments to this report is as complete as possible, Table 1 outlines the outstanding changes to be completed as at 30 July 2026.

Table 1. Draft C450ggee Changes to Documents Outstanding

Document	Changes outstanding*	Expected finalisation
Creamery Road Precinct Structure Plan (City of Greater Geelong, August 2026)	**None**** All changes recommended by the Committee implemented in version as per **Attachment 5**, including Recommendations 1a-f & 2a-l.	Complete
Creamery Road Development Contributions Plan (City of Greater Geelong, August 2026)	Updates to transport costs pending further action on Committee recommendations 3b and 4c. Other potential updates in response to recommendation 4c may also include land costs and planning costs. This work will likely increase the levy. Specifically: 140. Confirmation of updated design costings for IN_01, IN_03, IN_04, IN_05, and IN_06; 141. Confirmation of land costs for drainage assets SRB_06a; 142. Confirmation of planning costs subject to final invoice for Committee hearing. Note: Draft DCP as per **Attachment 6** assumes: 143. Inclusion of BR_01 at P90 probability 144. Exclusion of BR_01 northern road approach 145. Other changes as proposed in paragraph 87.	Late August/ early September 2026
Creamery Road Native Vegetation Precinct Plan (Biosis, June 2024)	Updates as per Committee recommendations 5 and 6a-c.	August 2026
Documents associated with the NWGGA Strategic Assessment (See paragraph 7.8)		Subject to finalisation of Strategic Assessment

*as at completion of Council report 30 July 2026.

**some changes may be needed to correct minor details prior to lodgement.

Response to NWGGA SAC Referral Report Recommendations

Recommendation	Council response
1. Amend the Final Creamery Road Future Urban Structure Plan (Document 126) as follows:	
a) Show the northern and southern Local Convenience Centres in the locations on the Exhibited Future Urban Structure Plan, and at a size of 1,000 square metres each.	Agreed and implemented – see **Attachment 4**; noting that the sizing is not relevant to depict on the FUS.
b) Retain Community Parks 6 and 7 as one-hectare parks.	Agreed and implemented – see **Attachment 4**.
c) Show a 'potential' left-in/left-out intersection on Midland Highway between Geelong Ballan Road and the Clever and Creative Boulevard, with an access street extending north to Creamery Road.	Agreed and implemented – see **Attachment 4**.
d) Reduce the extent of the green hatched 'Cowies Creek Conservation' area to 50 metres (measured from the edge of bank) on the southern side of Cowies Creek on the land at 200 Geelong-Ballan Road, Moorabool.	Agreed and implemented – see **Attachment 4**.
e) Designate the north-eastern corner of Properties 1, 2 and 3 (Yih-Sheng land) (north of Cowies Creek) as 'potential developable land subject to future investigation'.	Agreed in principle and implemented – see **Attachment 4**. However, it remains Council's position the conservation area remains the most appropriate land use for the area. See **Attachment 2, Section "Net Developable Land (NDA)"**.
f) Delete the red line described as '100-metre buffer to Cowies Creek'.	Agreed and implemented – see **Attachment 4**.
2. Amend the Final Creamery Road Precinct Structure Plan (Document 141) as follows:	
a) Replace the Future Urban Structure Plan with the amended plan revised in accordance with Recommendation 1.	Agreed and implemented – see **Attachment 5**.
b) Change the title of Table 4 to 'Dwelling Density Targets' and update references within Requirement 9 to reflect this change.	Agreed and implemented – see **Attachment 5**.
c) Revise Guideline 14 to read as follows: *Gating or other measures that restrict public access to streets, parks, pedestrian or cycling connections should be avoided.*	Agreed and implemented – see **Attachment 5**.

Recommendation	Council response
2. Amend the Final Creamery Road Precinct Structure Plan cont.	
d) Delete Design Intent 11, 17, 18 and 21 from Appendix 5.	Agreed and implemented – see **Attachment 5**.
e) Delete the Design Principles (Table 24) from Appendix 5 and make any consequential changes arising from the deletion of Table 24.	Deletion of table is not supported, however significant revisions applied. See **Attachment 2, Section "Drafting"**.
f) Update Design Intent 1 in Appendix 5 as follows: *Provide a high-quality visual and physical connection through the NAC to public realm features, such as the town square and the Clever and Creative Boulevard.*	Agreed and implemented – see **Attachment 5**.
g) Update Design Intent 5 in Appendix 5 as follows: *Provide a diverse mix of retail, office and commercial uses at ground floor level.*	Agreed and implemented – see **Attachment 5**.
h) Update Design Intent 10 in Appendix 5 as follows: *Provide active frontages and avoid blank facades along the Key Pedestrian Street, Town Square and the CCB. Street based retail centre designs are preferred. Internalised mall designs should be avoided.*	Agreed and implemented – see **Attachment 5**.
i) Amend Table 6 to increase the retail and commercial floor space to reflect an overall Neighbourhood Activity Centre size of 4 hectares and Local Convenience Centres of 1,000 square metres each.	Agreed and implemented – see **Attachment 5**.
j) Delete Guideline 38 (bicycle charging facilities).	Agreed and implemented – see **Attachment 5**.
k) Update requirements 86, 88 and 89 in the Creamery Road Precinct Structure Plan to enable some discretion when assessing setback requirements and vegetation management standards.	Agreed and implemented – see **Attachment 5**.
l) Delete references that specify the need to comply with the strategic assessment under Part 10 of the *Environment Protection and Biodiversity Conservation Act 1999*.	Agreed and implemented – see **Attachment 5**.

Recommendation	Council response
m) Revise Requirement 66 to read as follows: All lots must be connected to: • A safe and reliable potable water supply and sewerage services; and • A reticulated recycled water system to provide for the supply of recycled water from a suitable scheme for toilet flushing, washing machine use and outdoor use including lawn and garden watering, unless otherwise agreed by the responsible authority and Barwon Water.	Agreed and implemented – see **Attachment 5**.
3. Undertake the following additional work before the Creamery Road Development Contributions Plan is finalised:	
a) Update the traffic modelling to account for the increase in Net Developable Area and redistribution of traffic based on the amended Future Urban Structure Plan revised in accordance with Recommendation 1.	Detail re-modelling is not required however Council, in consultation with Head, Transport for Victoria, agreed to review of modelling inputs prior to redesign of intersections. This will inform response to Recommendation 3b. See **Attachment 2, Section "Transport"**.
b) Re-design and re-cost Intersections 1, 3, 4, 5, 6 and 7 (including the alternative of a roundabout for Intersection 7) in light of the updated traffic modelling.	Agreed in regards to arterial intersections (IN_01, IN_03, IN_04, IN_05, and IN_06). Updates underway, minor changes expected to costing. Expected completion late August/early September. Re-design and re-costing of internal road intersection IN_07 not supported as will negatively impact bus priority capabilities. See **Attachment 2, Section "Transport"**.
c) Expand the scope of Bridge 1 to include an appropriate length of the northern approach road (the length will be informed by the review of costings as recommended in Chapter 4.3).	Not supported – inclusion of the northern road approach will have a negative impact on the DCP. See **Attachment 2, Section "Development Infrastructure Levy"**.

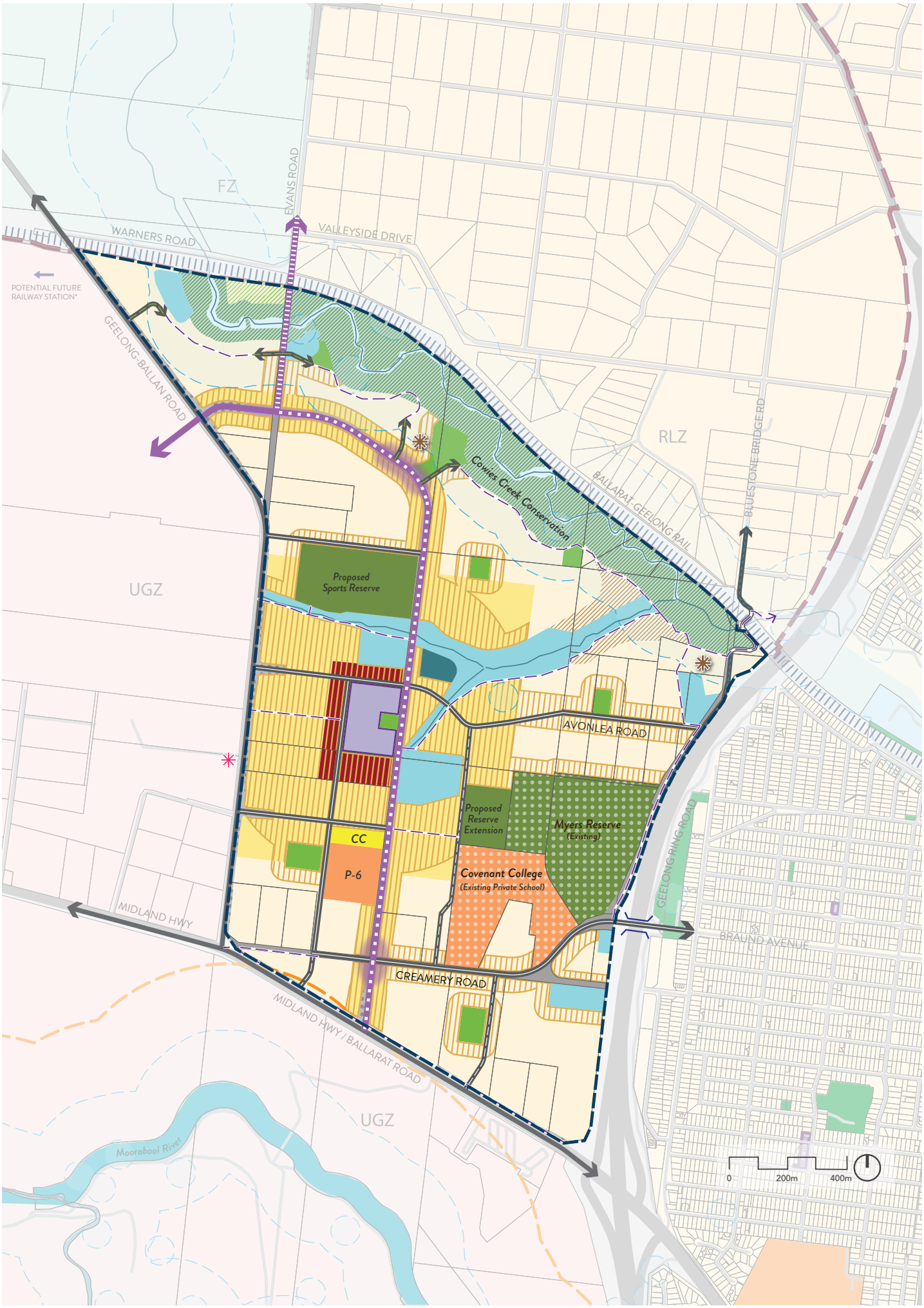
Recommendation	Council response
d) Review the cost of Bridge 1 taking into account: • The cost of integrating an appropriate length of the northern road approach into the scope of the project. • Adopting a P90 value (90 percent probability-based confidence level) as the basis for the costing.	Agreed. See **Attachment 2, Section "Development Infrastructure Levy"**.
4. Amend the Final Creamery Road Development Contributions Plan (Document 128) as follows:	
a) Update the description of BR-01 in the DCP as follows: *Delivery of Batesford South PSP bridge (arterial road - Lynnburn Road over Moorabool River) - interim bridge for arterial road extension of Lynnburn Road over Moorabool River (including an appropriate length [insert X metres as determined by the further work in Recommendation 3(d)] of the northern road approach).*	Change redundant as Council does not accept recommendation to include the northern approach road to BR_01.
4. Amend the Final Creamery Road DCP cont.	
b) Update the project costings for Bridge 1 in accordance with the revised costings prepared under Recommendation 3(d).	Agreed – P90 probability for BR_01 adopted. Inclusion of northern approach road not supported. See **Attachment 2, Section "Development Infrastructure Levy"**.
c) Update any other project costings to account for any other consequential changes arising from the Committee's recommendations in this Report.	Agreed.
5. Undertake the following additional work before finalising the Creamery Road Native Vegetation Precinct Plan:	
a) Confirm the native vegetation condition scores which informed the plan are accurate.	Agreed.
6. Amend the Creamery Road Native Vegetation Precinct Plan as follows:	
a) Include an expiry date.	Agreed. To be implemented in NVPP update.

Recommendation	Council response
b) Delete any reference to the strategic assessment under Part 10 of the Environment Protection and Biodiversity Conservation Act 1999 and replace with a reference to "any approval under the Environment Protection and Biodiversity Conservation Act 1999".	Agreed. To be implemented in NVPP update.
c) Any consequential changes required following the completion of further work identified in recommendation 5.	Agreed. To be implemented in NVPP update.
7. Amend the Final Schedule 8 to the Urban Growth Zone (Document 142) as follows:	
a) Replace the Future Urban Structure Plan at Plan 1 with the amended plan revised in accordance with Recommendation 1.	Agreed
b) Amend Clause 2.3 (Section 1 – Permit not required) to increase the combined leasable floor areas for shops within the Commercial 1 Zone to reflect an overall Neighbourhood Activity Centre size of 4 hectares.	Agreed
7. Amend the Final UGZ8 cont.	
c) Amend Clause 3.0 (Application requirements) to delete the following: *Despite the above, the responsible authority may determine that a Preliminary Risk Screen Assessment Statement is not required in relation to an application to use or subdivide land, construct a building, or construct or carry out works for or associated with a new sensitive use (residential use, child care centre, kindergarten, pre-school centre, primary school, children's playground, and secondary school) where a suitably detailed Preliminary Site Investigation has been provided which, to the satisfaction of the responsible authority, adequately assesses land contamination risks and demonstrates the suitability of the land for the proposed sensitive use.*	Agreed

Recommendation	Council response
d) Amend Clause 4.0 (Conditions and requirements for permit) to: • Delete reference to land at 10 Evans Road, Bell Post Hill (1\LP203190) and 85-105 Bluestone Bridge Road, Bell Post Hill (1\PS403299) from the environmental audit condition. • Delete the following from the environmental audit condition: *All the recommendations of the environmental audit statement must be complied with to the satisfaction of the Responsible Authority, prior to commencement of use of the site. Written confirmation of compliance must be provided by a suitably qualified environmental consultant or other suitable person acceptable to the responsible authority. Compliance sign off must be in accordance with any requirements in the environmental audit statement recommendations regarding verification of works.*	Agreed
e) Amend Clause 3.0 (Application requirements) to delete the requirements relating to bushfire risk, and replace with the following provision: *An application for subdivision of land adjoining bushfire hazard areas identified on Plan 23 in the Creamery Road PSP must include a perimeter road between the bushfire hazards area and future development, except where it has been demonstrated to the satisfaction of the responsible authority that site constraints make such roads impracticable and alternative bushfire protection measures are provided.*	Agreed in principle, noting Plan 23. Bushfire has been removed from the PSP so amended wording may be needed.
f) Insert the following at Clause 3.0 (Application requirements): *A report demonstrating that the proposal is in accordance with any relevant approval or draft approval under the Environment Protection and Biodiversity Conservation Act 1999.* ***Certificate of Acknowledgement of Consent*** *An application to subdivide land, construct a building, or construct or carry out works must be accompanied by a Certificate of Acknowledgement of Consent recording agreement with the City to rely on the Northern and Western Geelong Growth Areas EPBC Plan approval under Part 10 of the Environment Protection and Biodiversity Conservation Act 1999except where there is an intention to rely on a proposed or existing approval under Part IX of that Act.*	Agreed

7. **Amend the Final UGZ8 cont.**

Recommendation	Council response
g) Insert a new decision guideline at Clause 6.0: *Whether the application is generally in accordance with the draft EPBC Plan or any relevant approval under the Environment Protection and Biodiversity Conservation Act 1999.*	Agreed
h) Delete Condition – Commonwealth Biodiversity Developer Implementation Plan at Clause 4.0.	Agreed
i) Revise the specific provisions for the Cowies Creek Conservation Area at Clause 2.4 to read as follows: *Any proposed subdivision within or directly adjacent to the Cowies Creek Conservation Area as shown in Plan 17 Biodiversity & Threatened Species of the Creamery Road PSP.*	Agreed
j) Revise the specific provisions for the Cowies Creek Conservation Area at Clause 2.5 to read as follows: *Any proposed development (including earthworks, paths, in-stream pools, ephemeral soaks, street furniture or other infrastructure works) within or directly adjacent to the Cowies Creek Conservation Area as shown in Plan 17 Biodiversity & Threatened Species of the Creamery Road PSP.*	Agreed
k) Delete any other remaining references the specify the need to comply with Part 10 of the *Environment Protection and Biodiversity Conservation Act 1999*.	Agreed
l) Amend Clause 2.5 (Recycled Water) to read as follows: *A building must be connected to a reticulated recycled water supply system, or a rainwater tank of minimum 2kL or an alternative grey water recycling system scheme, for toilet flushing, washing machine use and outdoor use including lawn and garden watering, unless otherwise agreed by the responsible authority and Barwon Water.*	Agreed


FZ
EVANS ROAD
WARNERS ROAD
VALLEYSIDE DRIVE
POTENTIAL FUTURE RAILWAY STATION*
GEELONG-BALLAN ROAD
RLZ
BLUESTONE BRIDGE RD
Cowies Creek Conservation
BALLARAT-GEELONG RAIL
UGZ
Proposed Sports Reserve
AVONLEA ROAD
Proposed Reserve Extension
Myers Reserve (Existing)
CC
P-6
Covenant College (Existing Private School)
GEELONG RING ROAD
MIDLAND HWY
BRAUND AVENUE
CREAMERY ROAD
MIDLAND HWY / BALLARAT ROAD
UGZ
Moorabool River
0
200m
400m

LEGEND

- Precinct Boundary
- Parcel Boundary
- Urban Growth Boundary
- Railway Corridor
- Potential Future Railway Station
  *Subject to preparation of Batesford North PSP
- Heritage Homestead
- Emergency Hub (Indicative)
- 500m Quarry Buffer
- Area of Cultural Sensitivity

Future Urban Structure

- General Residential Zone (GRZ)
- Residential Growth Zone (RGZ)
- Mixed Use Zone (MUZ)
- Local Convenience Centre (RGZ)
- Neighbourhood Activity Centre (C1Z)
- Amenity Area
- Investigation area (subject to stormwater & geotechnical assessment)
- Potential developable land (subject to future investigation)
- Barwon Water Facility
- Waterway and Drainage Asset

- CC Early Years and Community Hub
- P-6 Government Primary School
- Existing Private School
- Community Park
- Proposed Sports Reserve
- Existing Sports Reserve
- Cowies Creek Conservation

Movement Network

- Clever and Creative Corridor
- Clever and Creative Corridor (Evans Road Variation)
- Clever and Creative Boulevard
- Key Pedestrian Street
- Recreational Transport Links
- Bridge
- Future Road Infrastructure
- Existing Road being retained
- Arterial Road
- Connector Road
- Indicative Local Access Street
- Conservation Interface Street
- Bluestone Bridge Road

THE CITY OF
GREATER GEELONG

DRAFT CREAMERY ROAD PRECINCT STRUCTURE PLAN

AUGUST 2026

CITY OF GREATER GEELONG

ACKNOWLEDGEMENT OF COUNTRY

We Acknowledge the Wadawurrung People as the Traditional Owners of the Land, Waterways and Skies. We pay our respects to their Elders, past, present and emerging. We Acknowledge all Aboriginal and Torres Strait Islander people who are part of our Greater Geelong community today.

CONTENTS

1.0 INTRODUCTION 8

1.0 Introduction 10

1.1 Realising the Aspirations of The Northern & Western Geelong Growth Areas Framework Plan 12

1.2 A Clever & Creative Approach 14

1.3 How to Read this Document 17

1.4 Land To Which This Psp Applies 18

1.5 Background information 20

1.6 Development Contributions Plan 20

1.7 Native Vegetation Precinct Plan 21

2.0 OUTCOMES 22

2.1 Vision 24

2.2 Objectives 25

2.3 Future Urban Structure 28

2.4 Land Use Budget & Population 30

3.0 IMPLEMENTATION 34

3.0 Implementation 36

3.1 Site Layout, Liveability & Character 38

3.1.1 Character 40

3.1.2 Housing Diversity, Density & Choice 46

3.1.3 Community Facilities & Education 54

3.1.4 Activity Centres & Employment 60

3.2 Streets & Public Realm 66

3.2.1 Complete Streets 68

3.2.1.1 Public transport 73

3.2.1.2 Cycling 74

3.2.1.3 Parking 76

3.2.2 Open Space Systems 78

3.3 Energy & Technology 84

3.3.1 Sustainable Energy & Zero Carbon 86

3.3.2 Smart Cities 90

3.4 Biodiversity & Threatened Species 94

3.5 Integrated Water Management 102

3.6 Climate Resilient Communities 110

3.6.1 Urban Greening 112

3.6.2 Bushfire Resilience 116

3.7 Circular Economy 118

3.8 Delivery 120

3.8.1 Subdivision Works 123

3.8.2 Development Staging 125

4.0 APPENDICES 147

A1. Property Specific Land Budget 142

A2. Complete Streets 144

A2.1 Street Type & Attributes 144

A2.2 Street Types & Cross Sections 147

A2.3 Street intersections 162

A3. Open Space Delivery Requirements 164

A4. Activity Centres 166

A5. Service Placement Guidelines 170

A6. Canopy Cover 171

A6.1 Example Tree Species List 171

5.0 GLOSSARY 172

6.0 REFERENCES 178

6.1 Abbreviations 180

PLANS

1.0 INTRODUCTION 8

P1. Regional Context 11

P2. Northern & Western Growth Geelong Growth Areas Framework Plan 2020: Future Urban Structure 13

P3. Local Context 16

P4. Precinct Features 19

2.0 OUTCOMES 22

P5. Future Place Based Plan 29

P6. Precinct Land Use Budget Plan 31

3.0 IMPLEMENTATION 34

P7. Character 41

P8. Housing 47

P9. Community Facilities & Education 55

P10. Activity Centres 61

P11. Street Network 69

P12. Public & Active Transport 72

P13. Open Space Systems 79

P14. Utilities, Energy & Technology 87

P15. Smart Cities & Digital Connectivity 91

P16. BiodiversitY & Threatened Species 95

P17. Cowies Creek Landscape Plan 98

P18. Integrated Water Management 103

P19. Potable & Recycled Water Infrastructure 104

P20. Sewer Infrastructure 105

P21. Precinct Infrastructure 122

P22. Indicative Precinct Staging 125

TABLES

2.0 OUTCOMES 22

T1. Summary Land Use Budget 32

3.0 IMPLEMENTATION 34

T2. Key Place making Opportunities 43

T3. Housing Delivery Guide 52

T4. Dwelling Density Targets 53

T5. Community Facilities Delivery Guide 58

T6. Neighbourhood Activity Centre 65

T7. Anticipated Employment Creation in the Precinct 65

T8. Bicycle Parking Minimums 75

T9. Open Space Delivery Guide 82

T10. Conservation Area Attributes 97

T11. Integrated Water Management Asset Summary 109

T12. Canopy Coverage Requirement by Land Use 114

T13. Precinct Infrastructure 128

4.0 APPENDICES 147

T14. Property Specific Land Budget 142

T15. Street Types & Attributes 144

T16. Intersection Requirements 145

T17. Complete Streets General Requirements 145

T18. Transit & Transit Stop Design Requirements 146

T19. Open Space Delivery Requirements 164

T20. NAC Precinct Key Design Intent 166

T21. Activity Centre & Commercial Development Design Principles 167

T22. Service Placement Guideline 170

T23. Example Tree Species List 171

1.0

INTRODUCTION

1.0	Introduction	10
1.1	Realising the Aspirations of The Northern & Western Geelong Growth Areas Framework Plan	12
1.2	A Clever & Creative Approach	14
1.3	How to Read this Document	17
1.4	Land To Which This Psp Applies	18
1.5	Background information	20
1.6	Development Contributions Plan	20
1.7	Native Vegetation Precinct Plan	21

1.0 INTRODUCTION

The Creamery Road Precinct Structure Plan (the PSP) has been prepared by the City of Greater Geelong (the City) in collaboration with government agencies, service authorities, major stakeholders and the community.

The PSP is a long-term strategic plan to guide urban use and development. It describes how land is expected to be developed, what natural assets must be protected, and how and where services are planned to support this development.

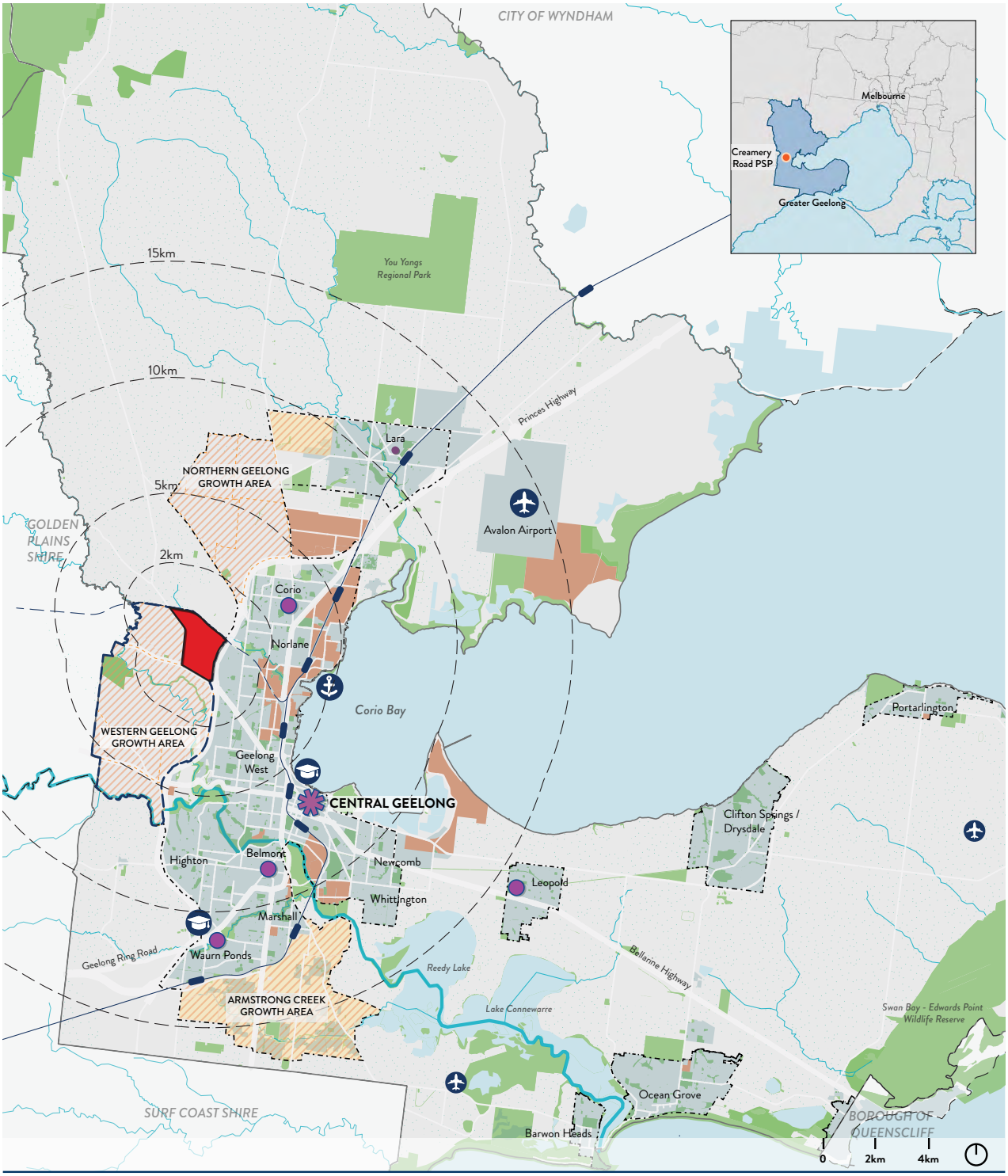
The PSP:

- Sets out plans to guide the delivery of quality urban environments in accordance with the Precinct Structure Planning Guidelines: *New Communities in Victoria (VPA, 2021) (PSP Guidelines);*
- Enables the transition of non-urban to urban land;
- Outlines the vision for how land should be developed and the desired outcomes to be achieved;
- Outlines the projects required to ensure that future residents, visitors and workers within the area are provided with timely access to services and transport necessary to support a quality and affordable lifestyle;
- Sets out objectives, requirements and guidelines for land use, development and subdivision.
- Provides government agencies, the City, developers, investors and local communities with certainty about all future use and development;
- Addresses the aspirations and actions of Northern and *Western Geelong Growth Areas Framework Plan (August 2020);*
- Addresses the requirements of the *Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act 1999)* through the Northern and Western Growth Areas EPBC Plan and Strategic Impact Assessment.

The PSP is informed by:

- The Planning Policy Framework as set out in the Greater Geelong Planning Scheme;
- *NWGGA Standing Advisory Committee Referral 1 Report – Volumes 1 & 2 (Creamery Road Precinct Structure Plan and Development Contributions)*;
- *The Precinct Structure Planning Guidelines: New Communities in Victoria (VPA, 2021)*;
- *Northern and Western Geelong Growth Areas Framework Plan (City of Greater Geelong, August 2020)*;
- *The Northern and Western Geelong Growth Areas Integrated Water Management Plan (City of Greater Geelong, Barwon Water, 2021);*
- *Plan for Victoria (Victorian Government, 2025);* and
- Creamery Road PSP Background Report and the Creamery Road Native Vegetation Precinct Plan (NVPP).

P1. REGIONAL CONTEXT



LEGEND

- Creamery Road Precinct Area
- Western Geelong Growth Area
- Municipal Boundary - City of Greater Geelong
- Municipal Boundary - Other Councils
- Urban Growth Area
- PSP Boundary
- Completed PSP
- Established Urban Area
- Settlement Boundary
- Industrial Area
- Farmland
- Regional Activity Centre – Central Geelong
- Sub Regional Centre
- Airport
- Port
- University / Educational Institution
- Train Station
- Freeway/Highway
- Arterial Road
- Connector Street
- Waterway
- Waterbody
- Open Space

1.1 REALISING THE ASPIRATIONS OF THE NORTHERN & WESTERN GEELONG GROWTH AREAS FRAMEWORK PLAN

The Northern and Western Geelong Growth Areas Framework Plan – August 2020 (Framework Plan) is a high-level strategic document which guides the urban development of the Northern and Western Geelong Growth Areas (NWGGA). It includes actions and objectives to be responded to in the preparation of precinct structure plans for the NWGGA.

The NWGGA is the largest greenfield planning project in regional Victoria, containing approximately 5,300 hectares. It is anticipated to deliver up to 40,000 new dwellings to accommodate a population of approximately 112,000 people.

The NWGGA is located north-west of the Geelong CBD. Both the Northern and the Western Growth Areas consist of largely open, treeless agricultural land primarily utilised for grazing and cropping activities and are also home to nationally significant flora and fauna.

The Western Growth Area is bound by the Geelong Ring Road to the east, the Barwon River to the south and the Geelong-Ballarat rail line to the north. It has an area of 3,241 hectares and is anticipated to deliver up to 22,953 new dwellings for a population exceeding 64,000. The landscape is characterised by Cowies Creek, Barwon and Moorabool Rivers, views across the Barrabool Hills, and Batesford Quarry.

The Creamery Road Precinct is the first precinct proposed for development in the NWGGA. It is located in the north eastern corner of the Western Growth Area at the intersection of the Geelong Ballarat Railway line and the Geelong Ring Road.

Planning scheme amendment C395 incorporated the Framework Plan into the Greater Geelong Planning Scheme. It was gazetted on the 6th of May 2021. The amendment introduced Clause 11.02-2L - Northern and Western Geelong Growth Areas and recognises the Framework Plan as a background document which will inform the preparation of precinct structure plans in the NWGGA.

The Framework Plan sets out the following vision for the NWGGA:

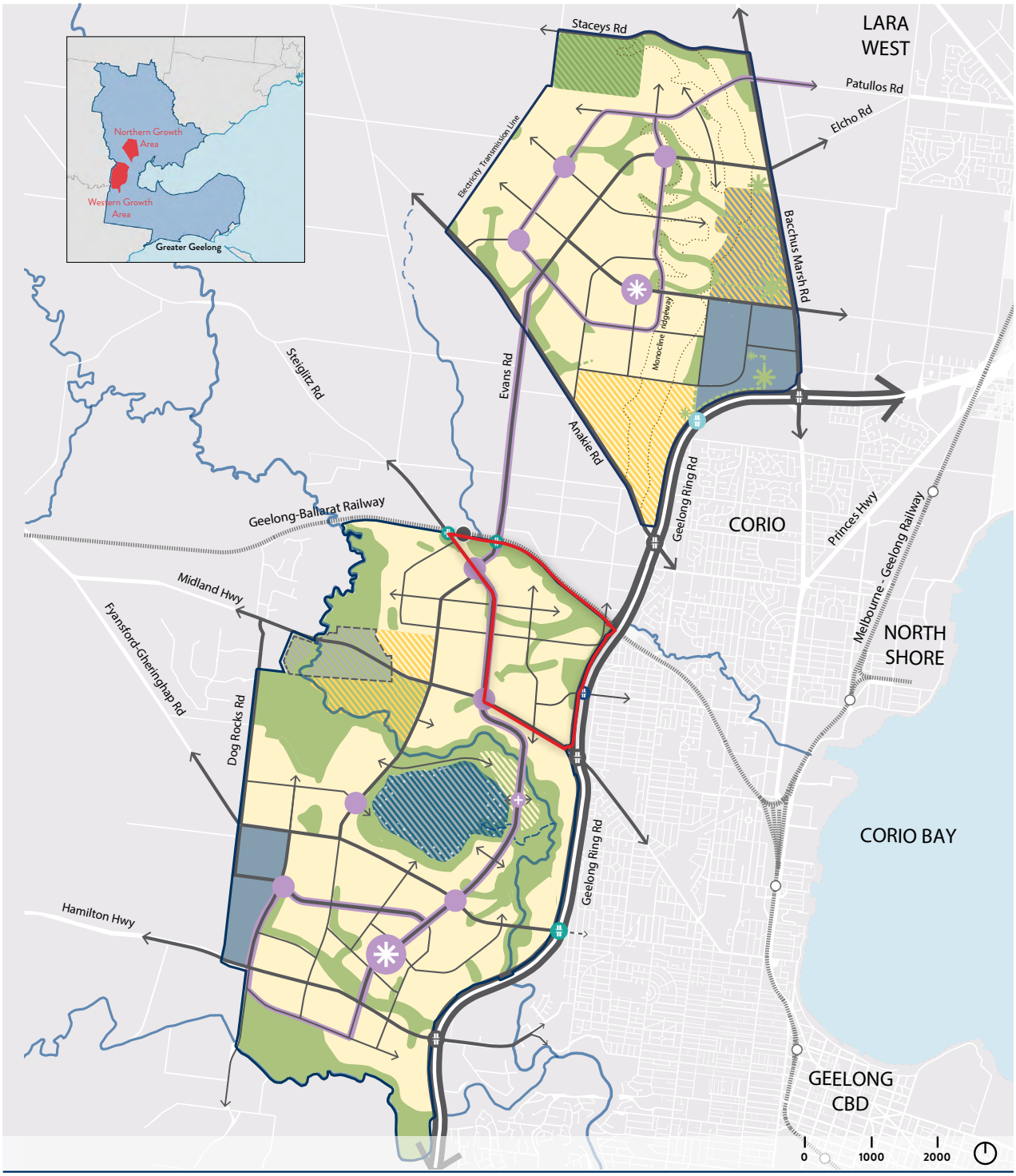
The Northern and Western Geelong Growth Areas will exemplify Geelong's transformation as a clever and creative city by building diverse, localised and sustainable neighbourhoods that prioritise self-sufficiency whilst maximising connections to the Geelong community, economy and identity.

The Framework Plan pursues innovation in the design and development of the NWGGA precinct structure plans to enable:

- Comfortable climate resilient communities;
- Zero carbon and zero waste communities;
- Integrated water management systems around major catchments;
- A Clever and Creative network that prioritises active transport and transit to develop 20 minute neighbourhoods;
- Smart city infrastructure; and
- Environmentally sustainable development (ESD).

This PSP seeks to address the aspirations, objectives and actions of the Framework Plan and determine land uses and the urban structure for the Creamery Road Precinct.

P2. NORTHERN & WESTERN GROWTH GEELONG GROWTH AREAS FRAMEWORK PLAN 2020: FUTURE URBAN STRUCTURE



LEGEND

- Creamery Rd PSP
- Study Area
- Geelong Ring Road
- Arterial Road
- Connector St. (Indicative Alignment)
- Future Railway Station
- Public Transport (Potential Connection)
- Residential
- Employment
- Waterways
- Rural Living (Future Investigation of Residential)
- Rural Living (Future Investigation of Employment)
- Agriculture (Future Investigation of Conservation)
- Agriculture (Future Investigation of Rural Living)
- Lakeside Residential (Future Investigation of Conservation)
- Batesford Township
- Lake Waterbody
- Clever & Creative Corridor
- Activity Centre (Sub-Regional / Specialized Neighbourhood)
- Geelong Ring Road (Pedestrian Connection)
- Geelong Ring Road (New Connection)
- Geelong Ring Rd. (Upgrade Connection)
- Railway Crossing (Grade Seperation)
- Major Watercourse
- Potential Waterways
- Monocline Escarpment

1.2 A CLEVER & CREATIVE APPROACH

ZERO CARBON & ENVIRONMENTALLY SUSTAINABLE DEVELOPMENT

The *City's Climate Change Response Plan 2021-30* establishes a target of net zero community emissions by 2035. Similarly, the Framework Plan requires PSPs to deliver zero carbon and environmentally sustainable development (ESD).

ESD and zero carbon actions, requirements and guidelines have been embedded throughout the PSP to encourage applicants to explore subdivision and building design that responds to the City's ESD and net zero targets. The PSP has also been guided by the Sustainable Subdivisions Framework, prepared by the Council Alliance for a Sustainable Built Environment (CASBE)

ZERO WASTE COMMUNITIES

The Framework Plan requires waste minimisation, reuse, and recycling to be addressed in the construction and occupation of new neighbourhoods to fulfil the City's strategic goal of zero waste to landfill.

Developers are encouraged to mitigate waste streams by planning and managing construction processes to incentivise waste minimisation through material selection, reuse, and resource recovery. The PSP also seeks to encourage developers to consider methods to mitigate the environmental impact of construction through the use of locally sourced materials with high recycled content and low embodied carbon.

The City will be addressing zero waste to landfill as it applies to waste collection, transfer, and treatment at a municipality scale with the delivery of the City's *Sustainability Framework and Action Plan (2020)*, and the *Waste and Resource Recovery Strategy 2020-2030.*

COMPLETE STREETS & THE CLEVER & CREATIVE NETWORK

The Framework Plan prioritises safe, convenient, and integrated active and public transport in the design of its neighbourhoods. It seeks to create neighbourhoods that encourage walking and cycling, reduce car dependency, promote community safety and connectivity, support the delivery of greening, canopy trees and water sensitive urban design.

The Clever and Creative Corridor (CCC) is a dedicated active and public transport network that will connect all major activity centres and key land uses across the growth areas to support separated bicycle lanes, rapid public transit, and wide, tree-canopy lined pedestrian paths.

Its central location in each precinct, combined with streets and intersections designed to prioritise walking and cycling, will support the development of walkable and cyclable neighbourhoods around key land uses and destinations.

The CCC network passes through the north-west of the Creamery Road Precinct, linking to Evans Road to join the Western and Northern Geelong Growth Areas. A spur line of this network, named the Clever and Creative Boulevard (CCB), runs north-south through the Creamery Road Precinct. The CCB follows the topography of the land. Parks and other land uses have been located on the CCB to maximise views and proximity to natural assets and waterways.

TREE CANOPY

The City's Urban Forest Strategy 2015-2025 establishes a 25% canopy cover target for urban areas. *Clause 12.06-1S of the Greater Geelong Planning Scheme* includes a strategy to achieve an overall 30% tree canopy target for urban areas. In response to these targets and the aspirations of the Framework Plan, the PSP promotes the retention of existing canopy trees and sets localised minimum canopy targets for each land use, seeking to achieve a minimum of 30% canopy coverage across the precinct.

COMPACT HEALTHY NEIGHBOURHOODS

This PSP encourages greater dwelling densities in and around areas of higher amenity including activity centres, along the CCB, and near community facilities, schools, and open space. This approach will enable more people to live within a short walk to key services such as schools, parks, food and groceries and encourage walking, cycling and healthy lifestyles.

INTEGRATED WATER MANAGEMENT

Integrated water management recognises the interrelationships between different types of water and recognises the needs of local catchments and waterways, communities, and industries.

This approach to managing and supplying water is a key component of the *NWGGA Integrated Water Management Plan (2021)* which guides the preparation of all NWGGA precincts.

It will provide recycled water to every dwelling, support passive irrigation of street trees and open spaces, and enable stormwater capture, harvesting and treatment through detention and retarding basins to enhance environmental flows to Cowies Creek and local tributaries.

Integrated water management will contribute to cool urban landscapes that minimise urban heat island effect, create environments that sustain natural assets, and protect and improve the habitat of native species..

PROTECTING & RESTORING BIODIVERSITY

Cowies Creek supports a range of environmental values including a significant population of Growling Grass Frog (Litoria raniformis), listed as vulnerable under the *EPBC Act 1999*. Populations of Growling Grass Frog have also been recorded downstream of the PSP, highlighting the significance of the waterway in supporting the species.

The regionally significant Eastern Long-necked Turtle (Chelodina longicollis) was also recorded in Cowies Creek.

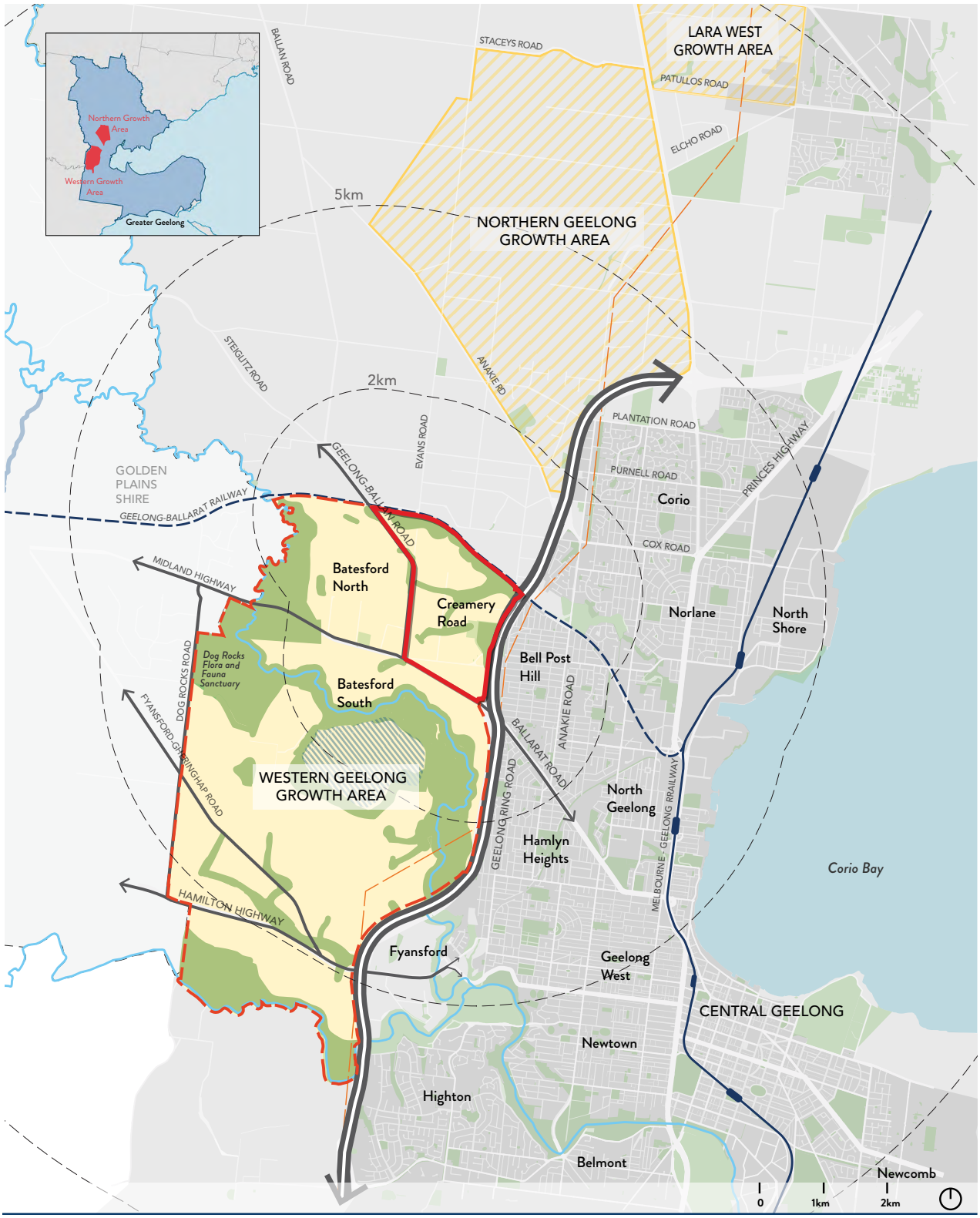
With respect to vegetation, nationally listed Adamson's Blown Grass (Lachnagrostis adamsonii) has been recorded along the creekline in addition to remnant patches of Creekline Grassy Woodland (EVC 68). Over 20 hectares of Plains Grassland EVC 132 persist throughout the precinct.

The Northern and Western Growth Areas EPBC Plan and supporting documents including the Biodiversity Conservation Strategy prepared by the City will inform biodiversity protection and conservation in the precinct (on land parcels not subject to separate EPBC approvals) and broader growth area in addition to the NVPP.

SMART CITIES

The PSP supports and enables the adoption of smart technologies and digital innovation that will provide high-performance information technology infrastructure, help the City manage local assets such as roads, intersections and car parking, and monitor the precinct's sustainability performance.

P3. LOCAL CONTEXT



LEGEND

- Creamery Road Precinct Area
- Western Geelong Growth Area
- Other Growth Area
- Established Urban Area
- Overhead Transmission Power Line
- Existing Quarry
- Future Open Space
- Train Station
- Freeway/Highway
- Arterial Road
- Connector Street
- Waterway
- Waterbody
- Open Space

1.3 HOW TO READ THIS DOCUMENT

The PSP guides land use and development where a permit is required under Schedule 8 to the Urban Growth Zone (UGZ) (Clause 37.07 of the Greater Geelong Planning Scheme), or any other provision of the Greater Geelong Planning Scheme that references the PSP.

1 STEP

REVIEW THE URBAN GROWTH ZONE SCHEDULE

The Urban Growth Zone Schedule 8 (UGZ8) of the Greater Geelong Planning Scheme sets out whether a planning permit is required for land use or development and includes requirements and conditions which must be met, in addition to decision guidelines.

2 STEP

UNDERSTANDING THE VISION & OBJECTIVES

A permit application and subsequent planning permit must respond to and implement the PSP vision and objectives outlined in *Section 2*.

3 STEP

IMPLEMENTATION

The implementation section is divided into a series of themes, derived from the overarching vision and objectives of the PSP. Each theme contains specific **Objectives**, **Requirements**, and **Guidelines**.

Objectives describe the desired outcome to be achieved by a proposal.

Requirements are mandatory and must be adhered to in developing land. Where they are not demonstrated to be met in a permit application, the application may be refused, or requirements may be included as a planning permit condition.

Guidelines are discretionary and should be adhered to in developing land, at the discretion of the responsible authority. If the responsible authority is satisfied that an application applies an alternative approach and it achieves the objectives, the responsible authority may approve the alternative approach.

Meeting the requirements and guidelines will achieve the PSP's vision, objectives, and desired outcomes.

4 STEP

OTHER CONSIDERATIONS

This PSP does not include every aspect that must be considered by a responsible authority when determining proposals on land within the precinct. The responsible authority will also determine proposals and issue permits in accordance with its powers under the Planning and Environment Act 1987 and the Greater Geelong Planning Scheme and, where necessary, apply discretion allowed for by these instruments.

Development must also comply with other statutes and approvals where relevant e.g. the EPBC Act 1999 in the case of biodiversity and the Aboriginal Heritage Act 2006 in the case of cultural heritage, amongst others.

1.4 LAND TO WHICH THIS PSP APPLIES

The Creamery Road Precinct is the first precinct to be developed in the NWGGA.

The precinct is located in the northeast corner of the Western Geelong Growth Area as shown on *Plan 3 Local Context.*

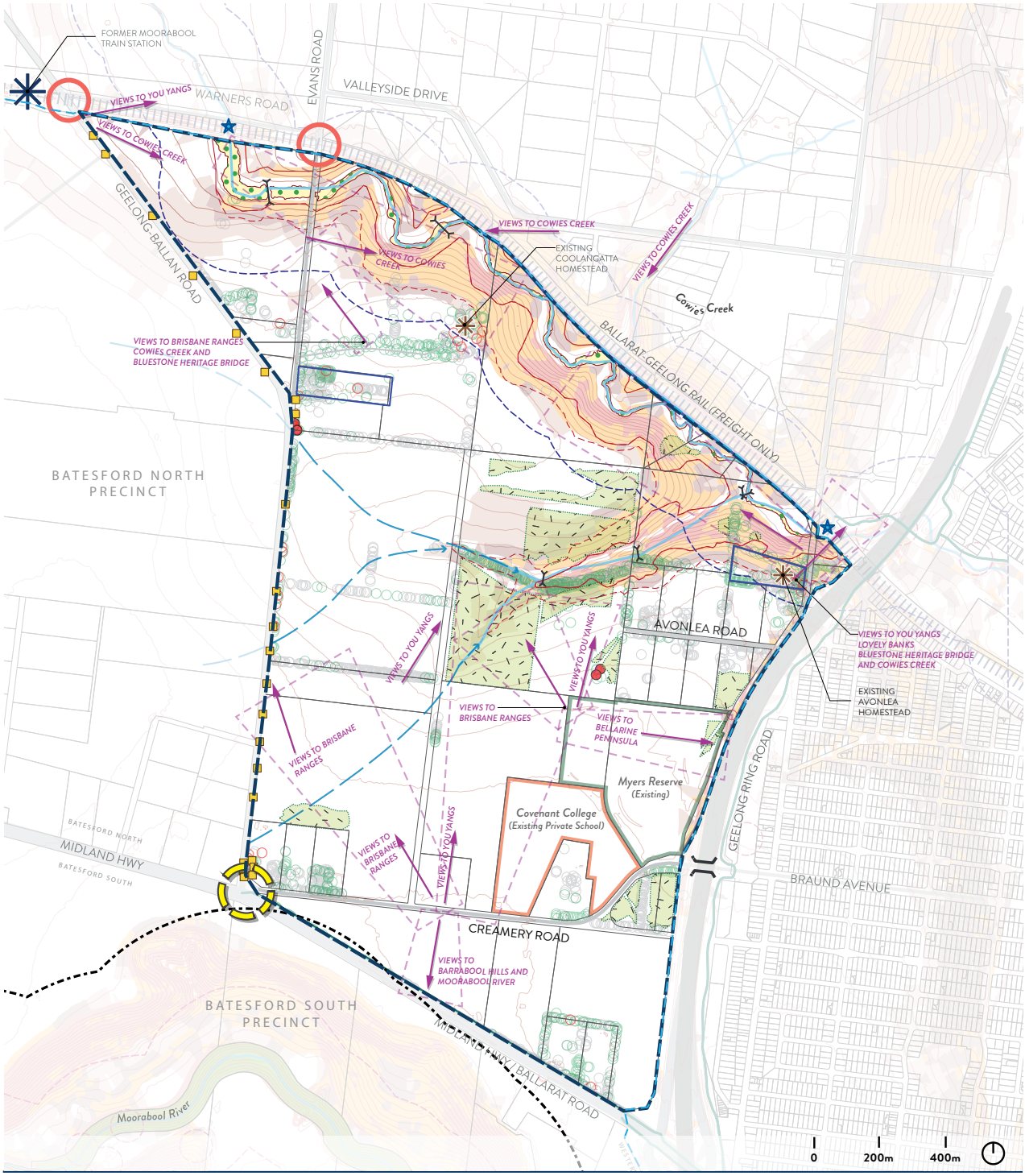
It occupies approximately 350 hectares of land and is bound by the Midland Highway/Ballarat Road to the south, the Princes Freeway/Geelong Ring Road to the east, Geelong-Ballan Road to the west and the Cowies Creek corridor and the Geelong-Ballarat rail line to the north. Cowies Creek runs from east to west inside the northern boundary of the precinct. The precinct topography features shallow gradients sloping toward Cowies Creek as shown on *Plan 4 Precinct Features.*

The PSP abuts the future Batesford North PSP to its immediate west (separated by Geelong-Ballan Road) and Batesford South PSP to its south (separated by the Midland Highway/ Ballarat Road). Land north of the railway corridor is utilised for rural living.

East of the precinct and Geelong Ring Road is the established suburb of Bell Post Hill. Most of the precinct's land is currently within the boundaries of Bell Post Hill.

Land south of Creamery Road is contained in the township of Batesford. The triangular corner of the precinct located west of Evans Road at present belongs to the locality of Moorabool.

P4. PRECINCT FEATURES



LEGEND

- Creamery Road PSP Area
- WGGA Boundary
- Property Parcels
- Contours (2.5m)
- Areas of Cultural Heritage Sensitivity
- Existing Educational
- Existing Sports Reserve
- Medium Potential for Contamination
- Existing Train Line
- Major Intersection
- Level Crossing
- Potential Future Railway Station
- Heritage Homestead
- Heritage Rail Bridge
- Informal Waterway Crossing
- Road Over Bridge
- Quarry Buffer
- Power Poles
- Viewline & View Cones
- Plains Grassland EVC132
- Creekline Grassy Woodland
- 100m Buffer to Cowies Creek
- Significant Grade Change (Slope 2-20%)
- Critical Rated Trees
- High Rated Trees
- Moderate Rated Trees
- Other Trees
- Direction of Drainage
- Waterbody
- Moderate Landslide Susceptibility
- High Landslide Susceptibility

1.5 BACKGROUND INFORMATION

The Creamery Road PSP Background Report provides detailed background information relating to the precinct, including its local and metropolitan context, history, landform and topography, biodiversity, drainage, open space, transport infrastructure, employment and community facilities.

The report summarises the technical studies that have informed preparation of the PSP. It also outlines the further work completed in response to the Standing Advisory Committee's recommendations.

1.6 DEVELOPMENT CONTRIBUTIONS PLAN

The Creamery Road Development Contributions Plan (the DCP) sets out the requirements for developers to contribute towards the basic and essential infrastructure required to support development of the precinct.

The DCP is a separate document to the PSP. It is incorporated into the Greater Geelong Planning Scheme under Clause 72.04 Incorporated documents and implemented through Schedule 11 to Clause 45.06 of the Greater Geelong Planning Scheme. The DCP Overlay applies to the same land as the PSP.

1.7 NATIVE VEGETATION PRECINCT PLAN

The Creamery Road Native Vegetation Precinct Plan (NVPP) is informed by the Biodiversity Conservation Strategy.

The NVPP identifies:

- Native vegetation to be protected;
- Native vegetation that can be removed, destroyed or lopped without a requiring a planning permit;
- Offsets that must be sourced by landowners, as outlined in the NVPP, prior to the removal of native vegetation; and
- Conditions that must be met to protect and retain vegetation.

The statutory basis for the NVPP is Clause 52.16 of the Greater Geelong Planning Scheme. The NVPP is a separate document to the PSP and is incorporated into the Greater Geelong Planning Scheme under Clause 72.04 Incorporated documents.

2.0

OUTCOMES

2.1	Vision	24
2.2	Objectives	25
2.3	Future Urban Structure	28
2.4	Land Use Budget & Population	30

2.1 VISION

The Creamery Road PSP will support a thriving, well connected and climate resilient community.

The Clever and Creative Boulevard (CCB) will form a dedicated active and public transport link, and connect the activity centres and key land uses to the wider growth area.

Increased housing density and diversity along the CCB and within and around the Neighbourhood Activity Centre (NAC) will allow residents to live within walking distance of day-to-day necessities and public transport. The precinct will support a range of housing typologies that support varying housing needs.

The street network will showcase 'blue-green' infrastructure, support canopy trees and prioritise walking and cycling and the creation of environments that are attractive and designed to a human scale. Best practice stormwater management and water sensitive urban design will deliver functional, high-amenity community spaces.

The precinct's open space system will recognise cultural values and perform an important role in conservation, recreation, greening and cooling.

Community facilities will be provided to ensure access to community services and spaces for social connection.

The PSP provides a framework to support zero carbon operation subdivision and development including the delivery of a fully electric precinct that includes energy efficient buildings and supports neighbourhood scale renewable energy opportunities.

The PSP will contribute to zero waste initiatives by encouraging the use of sustainable and locally sourced materials with low embodied carbon and high recycled content.

2.2 OBJECTIVES

SITE LAYOUT, LIVEABILITY & CHARACTER	
CHARACTER	• Protect cultural heritage and create opportunities for cultural awareness and education. • Maintain or create view corridors to significant features. • Ensure neighbourhoods and buildings respond to natural features, character and cultural heritage.
HOUSING	• Facilitate 4.5% affordable housing across the precinct, including social housing, in residential areas through voluntary provisions, in accordance with affordable housing policy, evidence, and guidance. • Facilitate housing diversity to cater to the needs of a diverse population. • Deliver environmentally sustainable and climate resilient housing that supports zero carbon outcomes. • Support greater densities of housing within walking distance of key destinations, amenities, and infrastructure. • Deliver a range of lot sizes and housing typologies that integrate with, and respond to, surrounding land uses and context.
COMMUNITY FACILITIES	• Deliver well designed community facilities and schools which are integrated, adaptable, sustainable and responsive to the context. • Support the timely delivery of community facilities and schools that cater to a diverse community. • Ensure community and education facilities are accessible by public transport, walking and cycling.
ACTIVITY CENTRES	• Deliver a walkable and vibrant neighbourhood activity centre that provides a range of retail commercial, community, and residential uses to serve the community and encourage best practice urban design. • Encourage activity centres to achieve best practice in ESD and zero carbon operation.
STREETS & PUBLIC REALM	
STREET NETWORK	• Establish a CCB that is vibrant, sustainable, encourages diverse land uses and supports an integrated movement network. • Provide high quality public and active transport for people early in the development of the precinct that links key spaces and places. • Develop a network of streets and paths that are designed for people at a human scale which are permeable, legible and inviting, and that prioritise pedestrians and cycling.
OPEN SPACE SYSTEMS	• Create a network of high amenity open spaces which integrate with the street network and provide recreational transport links to support the development of healthy communities • Deliver community parks which reflect local character and recognise and acknowledge Aboriginal and heritage values. • Provide sports (active) reserves that assist in meeting the sporting needs of the community. • Support expansive canopy coverage and the retention of valued trees to improve the amenity and use of open spaces. • Design open spaces which promote a sense of place and cater to users of all genders, ages, abilities and cultures.

2.2 OBJECTIVES

ENERGY & TECHNOLOGY

SUSTAINABLE ENERGY & ZERO CARBON

Zero Carbon

- Ensure utilities and services contribute towards the development of a fully electric, zero carbon precinct.
- Encourage development to consider the reduction of greenhouse gas emissions during the construction of the precinct, including through construction management practice and the selection of materials.
- Encourage subdivision and development to consider and responds to the whole-of-life cycle impacts of design and construction by using lower embodied carbon, local and recycled materials.

Supporting Renewable Energy

- Encourage the design and provision of utilities to promote sustainability and zero carbon operational neighbourhoods.
- Encourage development and subdivision to support, generate and supply renewable energy and achieve zero operational carbon by 2035.

SMART CITIES

- Encourage technology and communications infrastructure that can deliver and support smart city technologies.
- Encourage smart city infrastructure that integrates into the public realm.
- Support the provision of EV charging facilities in key locations accessible by the future community.

BIODIVERSITY, THREATENED SPECIES & NATIVE VEGETATION

- Prioritise the retention and enhancement of the Cowies Creek Conservation Area in accordance with relevant legislation, regulation and management plans.
- Protect and enhance biodiversity values within the Cowies Creek Conservation Area and increase community understanding and involvement in biodiversity conservation.

INTEGRATED WATER MANAGEMENT

- Achieve best practice stormwater management and water sensitive urban design, such as that outlined in EPA Publication 1739.1 (Urban stormwater management) or other equivalent document, that delivers functional, high amenity places for the community, including reducing the urban heat island effect.
- Promote sustainable water practices and technologies which protect local water resources and minimise potable water consumption.
- Encourage development that responds to climate change including flood and drought through best use of water in the landscape, including harvest and use.
- Ensure blue green infrastructure achieves best practice IWM outcomes via constructed waterways, treatment wetlands and other water sensitive urban design (WSUD) solutions to create high amenity spaces.
- Protect and enhance the hydrological, geomorphological, ecological and cultural values of Cowies Creek and its tributaries.
- Provide all lots with safe, reliable, potable and recycled water, services and reticulated sewerage.

CLIMATE RESILIENT COMMUNITIES

- Provide climate resilient housing and neighbourhoods and safe, comfortable places to live; considering bushfire risk, urban heat, thermal comfort, water usage, flood risk and stormwater management.

URBAN GREENING	• Combat the urban heat island effect, improve community resilience and wellbeing, protect existing vegetation while increasing biodiversity and Green (vegetation) Infrastructure.
BUSHFIRE RESILIENCE	• Ensure that bushfire hazards are identified and appropriately addressed in the layout and design of subdivisions, the local street network, and buildings and works.

CIRCULAR ECONOMY

- Encourage resource recovery and recycling during construction.
- Minimise levels of embodied carbon in buildings.
- Encourage a whole-of-lifecycle approach towards buildings and infrastructure, including the use of high-quality, locally sourced, sustainable construction materials that can be easily recycled or sustainably disposed.

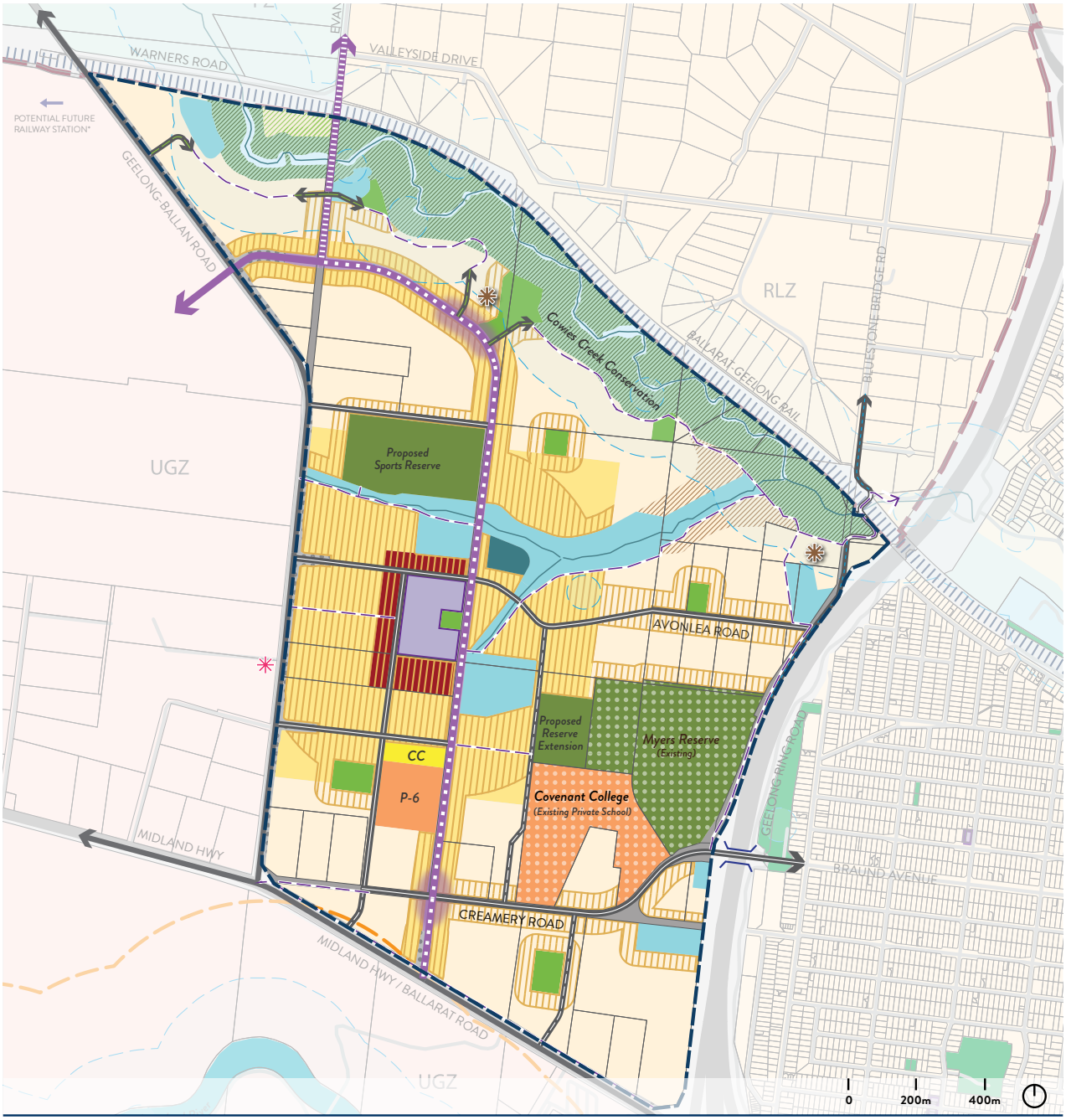
DELIVERY

- Ensure the timely delivery of key local and state infrastructure to facilitate early development of liveable communities.
- Encourage development staging to be co-ordinated with the delivery of key infrastructure.

2.3 FUTURE URBAN STRUCTURE

The Future Place Based Plan identifies the urban structure and sets out the precinct's land uses and primary street network.

P5. FUTURE PLACE BASED PLAN



LEGEND

- Precinct Boundary
- Parcel Boundary
- Urban Growth Boundary
- Railway Corridor
- Potential Future Railway Station *Subject to preparation of Batesford North PSP
- Heritage Homestead
- Emergency Hub (Indicative)
- 500m Quarry Buffer
- Area of Cultural Sensitivity

FUTURE URBAN STRUCTURE

- General Residential Zone (GRZ)
- Residential Growth Zone (RGZ)
- Mixed Use Zone (MUZ)
- Local Convenience Centre (RGZ)
- Neighbourhood Activity Centre (C1Z)
- Amenity Area a
- Investigation Area (Subject to Stormwater & Geotechnical Assessment)
- Potential developable land (Subject to Future Investigation)
- Barwon Water Facility
- Waterway & Drainage Asset
- CC Early Years & Community Hub
- P-6 Government Primary School
- Existing Private School
- Community Park
- Proposed Sports Reserve
- Existing Sports Reserve
- Cowies Creek Conservation

MOVEMENT NETWORK

- Clever & Creative Corridor
- Clever & Creative Corridor (Evans Road Variation)
- Clever & Creative Boulevard
- Key Pedestrian Street
- Recreational Transport Links
- Bridge
- Future Road Infrastructure
- Existing Road being Retained
- Arterial Road
- Connector Road
- Indicative Local Access Street
- Conservation Interface Street
- Bluestone Bridge Road

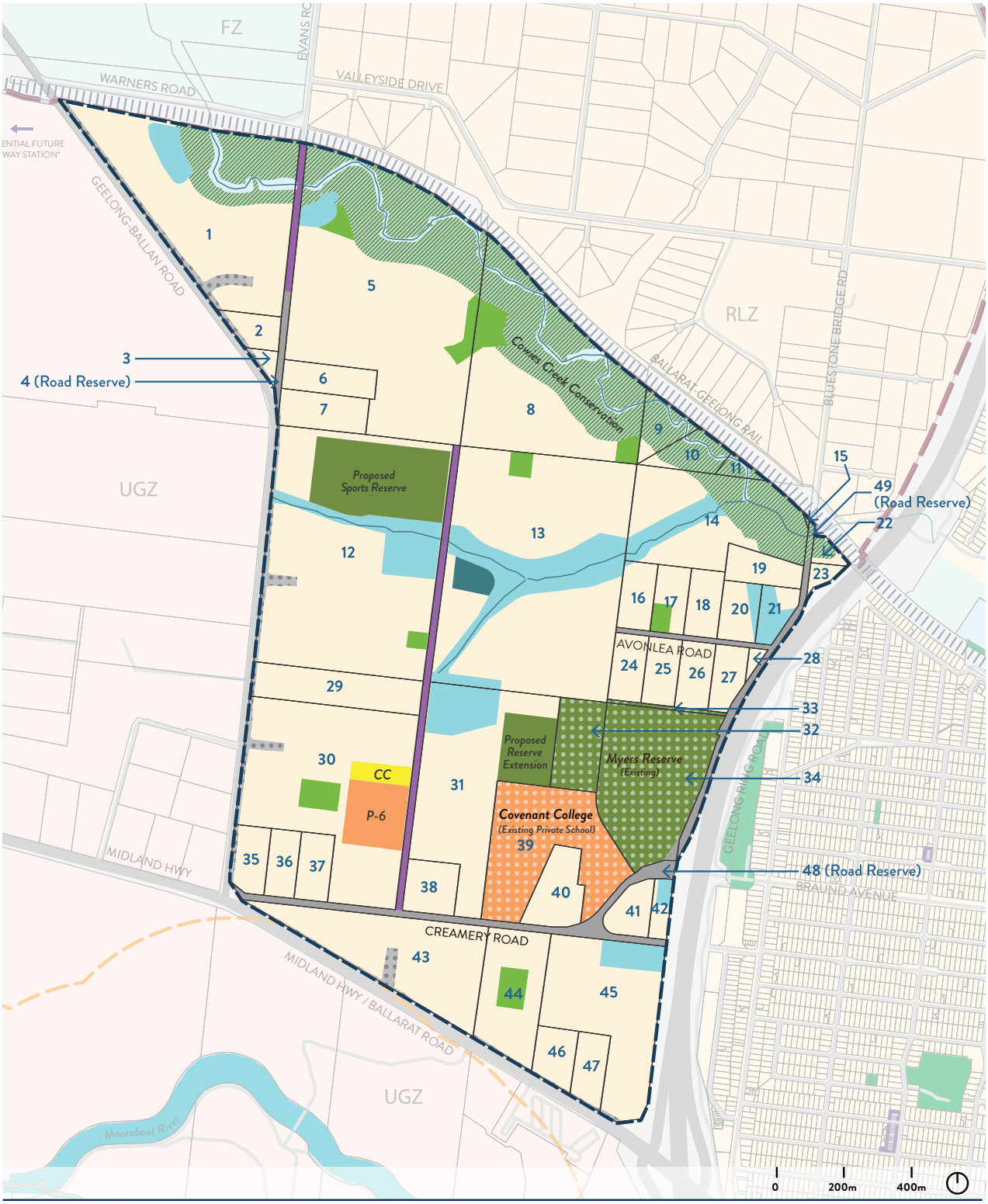
2.4 LAND USE BUDGET & POPULATION

Table 1 Summary Land Use Budget **provides a summary of the land required for transport, community facilities, government education facilities and open space and identifies the total amount of land available for development.**

The total area of the precinct is 344.57 hectares, 61% of which is available for development. This translates to a net developable area (NDA) of 210.22 hectares. The NDA is inclusive of the following areas: Conventional Residential Areas (CRA), Amenity Area and the Neighbourhood Activity Centre (NAC).

Based on the residential density thresholds established in *Table 3 Housing Delivery Guide* and *Table 4 Dwelling Density Minimums*, the PSP is expected to generate an estimated 4,204 dwellings to accommodate approximately 11,772 new residents.

P6. PRECINCT LAND USE BUDGET PLAN



LEGEND

- Precinct Boundary
- NDA
- Existing Road being Retained (Clever & Creative Network)
- Existing Road
- Future Road Infrastructure
- CC Proposed Early Years & Community Hub
- P-6 Proposed Government Primary School
- Existing Private School
- Community Park
- Cowies Creek Conservation
- Proposed Sports Reserve
- Existing Sports Reserve
- Waterway & Drainage Asset
- Barwon Water Facility

T1. SUMMARY LAND USE BUDGET

A property specific land budget table is provided in *Table 14 Property Specific Land Use Budget.*

DESCRIPTION	HECTARES	% OF PRECINCT	% OF NDA
TOTAL PRECINCT AREA (HA)	**344.565**	**100%**	
TRANSPORT			
Existing Road Being Retained (incl. non-developed road)	11.245	3.26%	
Road Widening (incl. intersections)	5.800	1.68%	
SUB TOTAL TRANSPORT	**17.045**	**4.95%**	
COMMUNITY & EDUCATION			
Existing Non-Government School	11.611	3.37%	
Proposed Government Primary School	3.500	1.02%	
Proposed Early Years and Community Hub	1.000	0.29%	
SUB TOTAL COMMUNITY & EDUCATION	**16.111**	**4.68%**	
OPEN SPACE			
UNCREDITED (ENCUMBERED) OPEN SPACE			
Cowies Creek Conservation Reserve	40.601	11.78%	
Drainage Assets (including Waterway Corridor Reserve)	22.207	6.44%	
Barwon Water Facilities	1.000	0.29%	
Existing Sports (Active) Research - Myers Reserve	17.316	5.03%	
SUB TOTAL UNCREDITED OPEN SPACE	**81.124**	**23.54%**	
CREDITED OPEN SPACE			
Sports (Active) Reserve	8.641	2.51%	4.07%
Myers Reserve Extension - Sports (Active) Reserve	3.250	0.94%	1.53%
Community Parks (including Town Square)	6.279	1.82%	2.96%
SUB TOTAL CREDITED OPEN SPACE	**18.170**	**5.27%**	**8.57%**

TOTAL PRECINCT AREA	344.565
TRANSPORT	17.045
COMMUNITY & EDUCATION	16.111
UNCREDITED OPEN SPACE	81.124
CREDITED OPEN SPACE	18.17
TOTAL ENCUMBERED LAND	132.45

TOTAL NET DEVELOPABLE AREA (NDA)	212.115
NAC (Commercial 1 Zone)	4.000
NAC (Mixed Use)	5.796
Residential Growth Zone (incl. amenity area)	66.810
General Residential Zone (incl. amenity area and all other NDA)	135.509

3.0

IMPLEMENTATION

3.0	Implementation	36
3.1	Site Layout, Liveability & Character	38
3.2	Streets & Public Realm	66
3.3	Energy & Technology	84
3.4	Biodiversity & Threatened Species	94
3.5	Integrated Water Management	102
3.6	Climate Resilient Communities	110
3.7	Circular Economy	118
3.8	Delivery	120

3.0 IMPLEMENTATION

The implementation section is divided into a series of themes derived from the overarching vision and objectives of the PSP.

THE THEMES ARE:

1.	**SITE LAYOUT, LIVEABILITY & CHARACTER**	• Character • Housing Diversity, Density & Choice • Community Facilities & Education • Activity Centre
2.	**STREETS & PUBLIC REALM**	• Complete Streets • Open Space Systems
3.	**ENERGY & TECHNOLOGY**	• Sustainable Energy & Zero Carbon • Smart Cities
4.	**BIODIVERSITY, THREATENED SPECIES & NATIVE VEGETATION**	
5.	**INTEGRATED WATER MANAGEMENT**	
6.	**CLIMATE RESILIENT COMMUNITIES**	• Urban Greening • Bushfire Resilience
7.	**CIRCULAR ECONOMY**	
8.	**DELIVERY**	• Subdivision Works • Development Staging

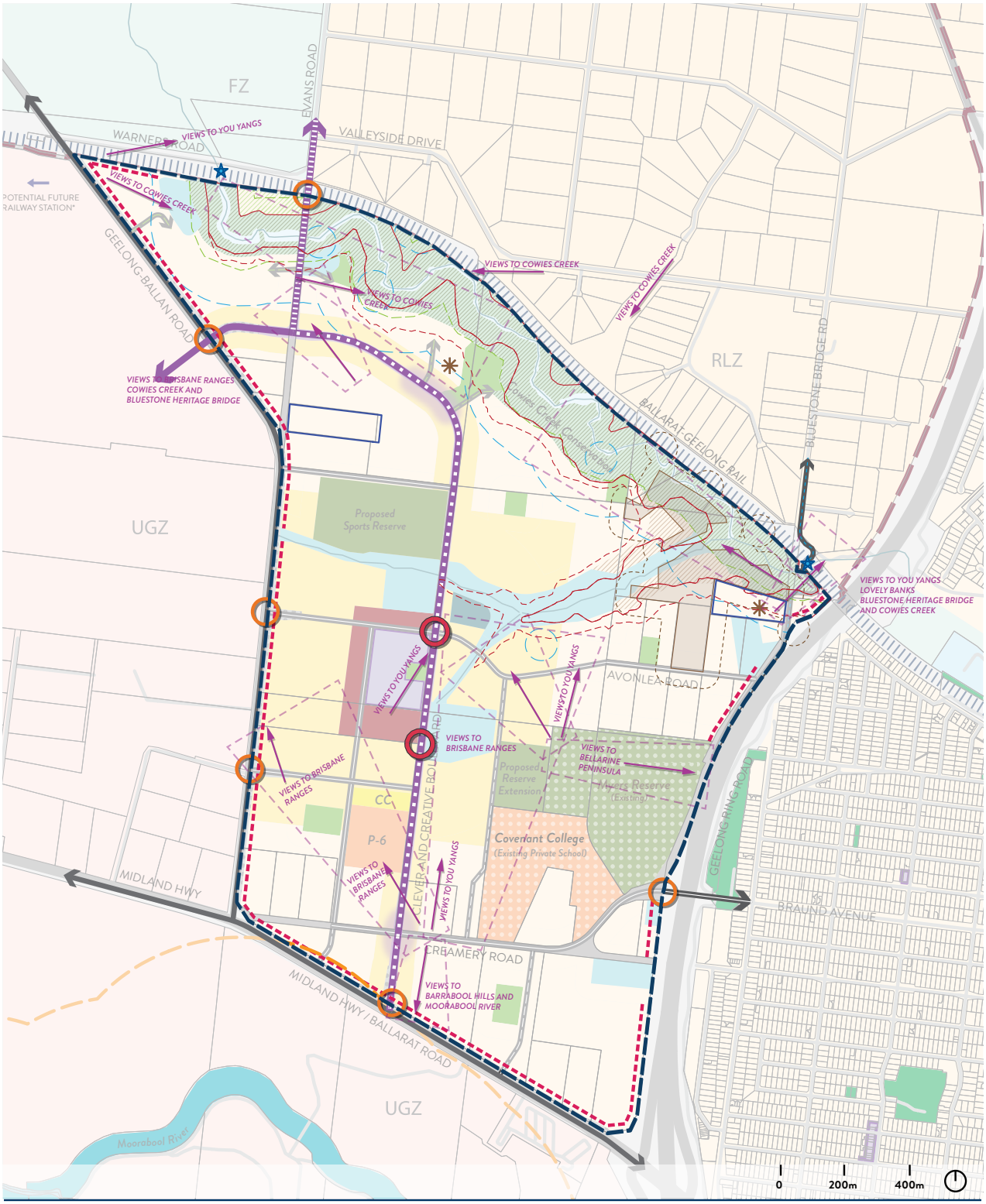
3.1 SITE LAYOUT, LIVEABILITY & CHARACTER

3.1.1	Character	40
3.1.2	Housing Diversity, Density & Choice	46
3.1.3	Community Facilities & Education	54
3.1.4	Activity Centres & Employment	60

3.1.1 CHARACTER

The precinct will ensure neighbourhoods and buildings are designed to respond to the surrounding natural landscape, character and cultural heritage.

P7. CHARACTER



LEGEND

- Precinct Boundary
- Clever & Creative Corridor
- Clever & Creative Corridor (Evans Road Variation)
- Clever & Creative Boulevard
- Cowies Creek Waterway
- 100m Buffer to Cowies Creek
- 500m Quarry Buffer
- Acoustic Treatment (Subject to Investigation)
- High Landslide Susceptibility
- Moderate landslide susceptibility
- Area of Cultural Sensitivity
- Aboriginal Cultural Heritage Extent & 50m Buffer
- Medium Potential for Contamination
- Heritage Homestead
- Heritage Rail Bridge
- Precinct Gateway
- Activity Centre Gateway
- Viewline & View Cones

3.1.1 CHARACTER

The precinct will ensure neighbourhoods and buildings are designed to respond to the surrounding natural landscape, character and cultural heritage.

REQUIREMENTS

R1

Subdivision design must respond to the natural and built features of the precinct including; topography, view lines and view cones, waterways, the Cowies Creek Conservation Area, planned gateways, interfaces and land uses as guided by *Plan 7 Character*.

R2

An application for subdivision or development within moderate landslide susceptibility areas as shown on *Plan 4 Precinct Features* and *Plan 7 Character)* must be accompanied by a geotechnical assessment in accordance with Australian Geomechanics Guidelines for Landslide Risk Management (2007).

Prior to commencement of works for each relevant stage of a subdivision, any geotechnical or landslide risks must be addressed and a plan prepared for their mitigation during construction in accordance with the recommendations of the geotechnical assessment.

A letter from a suitably qualified geotechnical practitioner must be submitted following mitigation works. It must indicate risks of landslide susceptibility and confirm that any hazards are acceptable and will remain acceptable for the duration of the use and/or development in accordance with the *Australian Geomechanics Guidelines for Landslide Risk Management (2007).*

R3

Permanent habitable building and structures must be avoided in high landslide susceptibility areas, as shown on *Plan 4 Precinct Features* and *Plan 7 Character.*

For any other development proposed in high landslide susceptibility areas, the following condition applies:

An application for subdivision or development within high landslide susceptibility areas as shown on *Plan 4 Precinct Features* and *Plan 7 Character*, must be accompanied by a full geotechnical assessment in accordance with the *Australian Geomechanics Guidelines for Landslide Risk Management (2007*) which includes detailed subsurface investigation and risk evaluation for both individual risk and societal risk.

The assessment must achieve low to very low risk levels to allow development.

Prior to commencement of works any geotechnical or landslide risks must be addressed and mitigated in accordance with the recommendations of the geotechnical assessment.

A letter from a suitably qualified geotechnical practitioner must be submitted following mitigation works. It must indicate risks of landslide susceptibility and confirm that hazards are acceptable and will remain acceptable for the duration of the use and/or development in accordance with *Australian Geomechanics Guidelines for Landslide Risk Management (2007).*

R4

Placemaking opportunities identified in *Table 2 Key Placemaking Opportunities* and supporting *Plan 7 Character* must be addressed to provide focal points, a sense of place and contribute to local neighbourhood interest.

R5

The design and layout of a subdivision must ensure the connection of the shared path along the waterway drainage corridor within the Conservation Interface Street (as shown on *Appendix 2.2 Street Types & Cross Sections*), to provide a continuous network, in accordance with *Plan 7 Character.*

R6

Subdivision and development abutting the Cowies Creek Conservation Area must be separated from the conservation area by the Conservation Interface Street (as shown on *Appendix 2.2 Street Types & Cross Sections*) or an appropriate local street.

R7

Development and/or subdivision adjoining the Acoustic Treatment Area identified on *Plan 8 Housing* must mitigate against noise from adjoining arterial roads and railway lines.

The design of any relevant noise attenuation measure must respect the surrounding neighbourhood and incorporate visually permeable materials to the satisfaction of the responsible authority or relevant authority.

T2. KEY PLACE MAKING OPPORTUNITIES

KEY CHARACTER ELEMENT	PLACEMAKING OPPORTUNITIES
PSP Gateways	These gateways identify vehicular entries to the precinct. These locations provide opportunities for landscaping embellishment, landmark built form which draws attention, wayfinding and signage.
Activity Centre Gateways	The activity centre gateways nominated are key active and public transport entries to the NAC Precinct. To address this function, a greater focus on the human scale is required with respect to built form and architectural design, interface treatments and materiality. These locations provide opportunities for landscaping embellishment, landmark built form which draws attention, wayfinding and signage and material changes to the road surface.
View Lines	The precinct benefits from views to local features and significant landscapes as identified in *Plan 4 Precinct Features*. The alignment of the CCB and the siting of several open spaces and community infrastructure seek to capitalize on these views. The configuration of streets in subdivision layouts, design of buildings and open spaces should consider and address view lines.
The CCB & Abutting Development	Developments in the NAC Precinct (including the Mixed Use Area) abutting the CCB should allow activity to flow into the CCB and encourage people to engage and dwell in the corridor. Non-residential uses in the NAC Precinct, Mixed Use Area, Amenity Areas and in Local Convenience Centres, are encouraged on the ground floor level of buildings fronting the CCB. Non-residential ground floor uses must incorporate active frontages to the CCB. The landscaping and street furniture on the CCB should encourage people to rest, meet and dine.

3.1.1 CHARACTER

GUIDELINES

G1

Rear and side fencing as well as solid high front fencing adjacent to open spaces should be avoided, as appropriate.

G2

Subdivisions that retain existing dwellings within lots should be designed to effectively integrate with the neighbourhood and surrounding present context, and ultimate likely development of the retained dwelling lot.

G3

Where possible, salvaged natural and manufactured materials (e.g. cut stone, site rock, timber, significant fallen trees) should be incorporated into public realm as landscape features to provide a distinctive sense of place and connection to the landscape.

G4

A consistent suite of lighting and street furniture responsive to the type and role of the street and place should be used across neighbourhoods and be in accordance with the City's Street Lighting Policy.

G5

An application for development and/or subdivision should respond to the recommendations of the Cultural Values Assessment (2023) associated with the PSP.

G6

Subdivision and/or development of land within the Heritage Homestead or Aboriginal Cultural Heritage Extent & 50m buffer, as identified in *Plan 7 Character*, should have regard to the cultural/heritage significance of the site and incorporate significant elements throughout a development and/or subdivision including:

- Providing an appropriate design response for a sensitive interface;
- Appropriately scaled development, proportion and materials; and
- Providing wider community access to the heritage features where appropriate.

G7

Visibility and recognition of Aboriginal history and culture should be prioritised through close consultation with the Wadawurrung Traditional Owners Aboriginal Corporation to incorporate where possible:

- Aboriginal names for places, streets and major new public infrastructure including open space and public buildings;
- Site interpretation through signage, public art or other mechanisms to promote awareness and appreciation of local Aboriginal cultural heritage;
- Materials which have significance to the Aboriginal community in landscaping public and open spaces; and
- Any relevant intangible values, such as views or connections.

G8

Lots and development abutting the Clever and Creative Corridor (CCC) or Clever and Creative Boulevard (CCB) should front the CCC/CCB, and in all other areas should front (in order of priority where there are multiple fronting elements):

- Drainage corridors and public open space;
- Cowies Creek conservation area;
- Local streets*;
- Connector roads;
- Arterial roads; and
- Schools.

*Local streets include pedestrian streets, micro streets, local access streets (1 and 2), and parking streets, as shown on *A3.2 Street Types & Cross Sections.*

G9

Facade treatment should be used to mitigate noise from adjoining roads and railway lines. The construction of acoustic barriers should be avoided where possible.

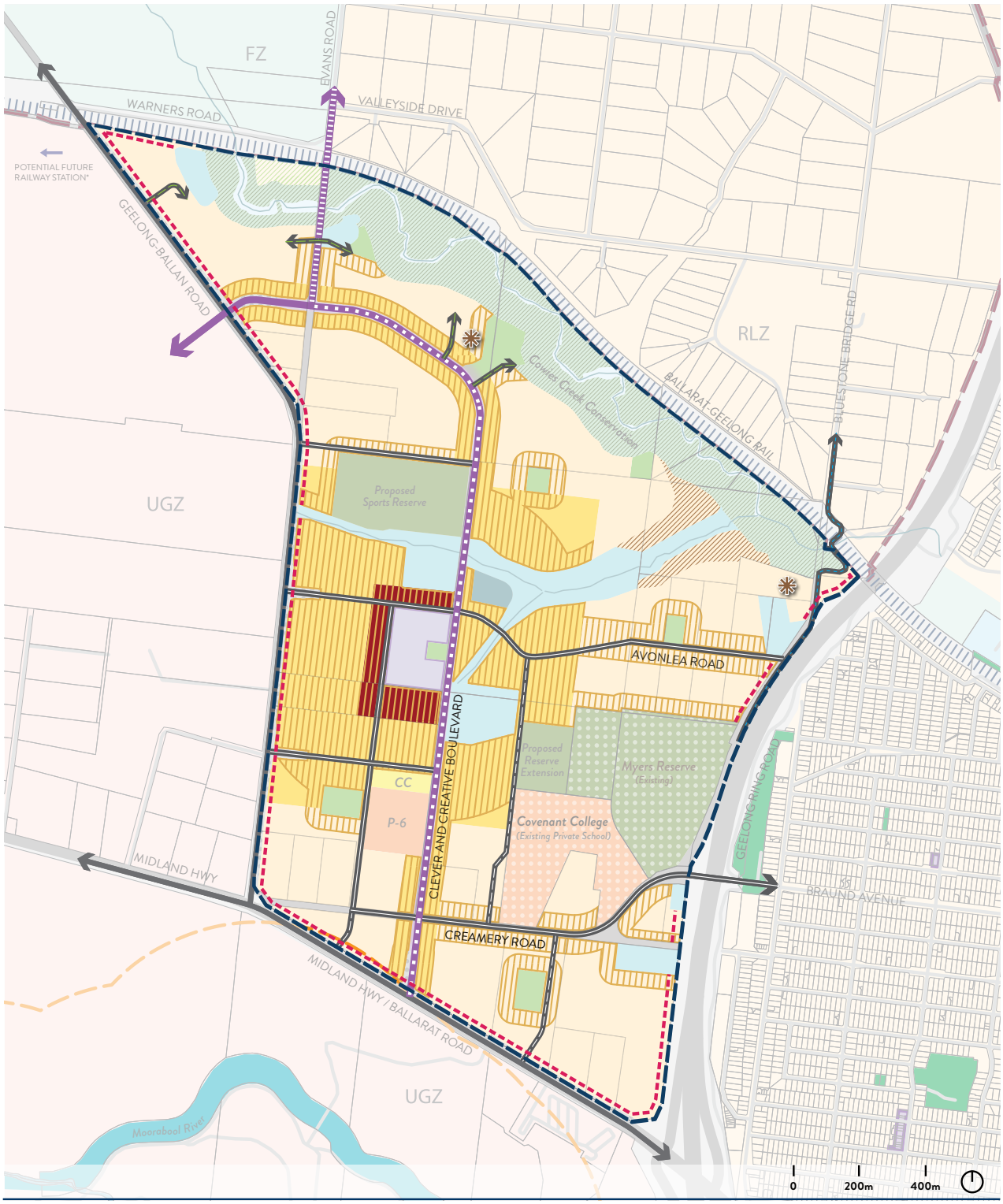
3.1.2 HOUSING DIVERSITY, DENSITY & CHOICE

The precinct will support a diversity of housing types in conventional residential areas, amenity areas, and the neighbourhood activity centre.

Residential ESD Guidelines will be prepared for all residential subdivisions to help deliver environmentally sustainable and climate resilient housing.

The use of Coolangatta and Avonlea Homesteads for recreational and non-residential uses which are respectful of these heritage places is encouraged.

P8. HOUSING



LEGEND

- Precinct Boundary
- General Residential Zone (GRZ)
- Residential Growth Zone (RGZ)
- Local Convenience Centre (RGZ)
- Mixed Use Zone (MUZ)
- Neighbourhood Activity Centre (C1Z)
- Amenity Area
- Investigation Area (Independent drainage solution to be investigated)
- Heritage Homestead
- 500m Quarry Buffer
- Acoustic Treatment (Subject to Investigation)
- Clever & Creative Corridor
- Clever & Creative Corridor (Evans Road Variation)
- Clever & Creative Boulevard
- Arterial Road
- Connector Road
- Indicative Local Access Street

3.1.2 HOUSING DIVERSITY, DENSITY & CHOICE

REQUIREMENTS

R8

An application for residential subdivision and/or development must be capable of accommodating a variety of dwelling types in accordance with *Plan 8 Housing* and *Table 3 Housing Delivery Guide.*

R9

Residential subdivisions must submit a density plan which:

a. Calculates the dwellings per hectare over the entire area of the subject site.

b. Demonstrates how the target density of an average of 20 dwellings per hectare is achieved and how it achieves a range of lots and housing typologies as per the housing delivery guide.

c. Identifies indicative dwelling targets for super lots.

d. Considers *Table 4 Dwelling Density Targets.*

The minimum density targets in *Table 4 Dwelling Density Targets* may be varied where the overall density for the subdivision achieves a target of 20 dwellings per hectare, to the satisfaction of the responsible authority.

R10

Subdivision applications containing super lots must be accompanied by a concept layout plan (drawn to scale and dimensioned) which demonstrates how the required dwelling yields can be achieved.

R11

An application for residential subdivision of ten or more lots or residential building and works (whichever comes first) must be accompanied by Residential ESD Guidelines which includes mechanisms to achieve environmentally sustainable and climate resilient housing to the satisfaction of the responsible authority.

- Subdivision: Prior to the certification of the plan of subdivision or the first stage of subdivision in the event of staged subdivision, unless otherwise agreed, by the responsible authority, Residential ESD Design Guidelines must be submitted and approved to the satisfaction of the responsible authority. The Residential ESD Design Guidelines must be applied as a restriction on the relevant plan of subdivision.
- Building and works: Residential ESD Design Guidelines must be submitted to the satisfaction of the responsible authority prior to a planning permit being granted. The required contents of the guidelines are to be shown on the endorsed plans.

GUIDELINES

G10

The design of residential subdivision and nomination of housing typologies should respond to the individual site context, opportunities and constraints.

G11

Specialised housing forms, such as retirement villages, residential aged care facilities and residential villages should where practicable:

- Provide a range of residential built form types;
- Integrate in to the wider urban structure;
- Incorporate active interfaces and ensure visual permeability;
- Minimise inactive interfaces, such as solid fencing/gates and walls, and blank facades;
- Be accessible by public transport; and
- Not present a barrier to the surrounding movement network.

G12

Gating or other measures that restrict public access to streets, parks, pedestrian or cycling connections should be avoided.

G13

Applications for subdivision or development of land for residential, or commercial or mixed-use purposes with a residential component, are encouraged to contribute towards the precinct's 4.5% affordable housing target. A variety of implementation mechanisms that can deliver an increase in the affordable housing stock in the municipality are encouraged.

G14

Where an affordable housing contribution is being provided, applications should include an Affordable Housing Delivery Strategy which addresses:

The contribution to be provided, including the amount and form of the contribution i.e. affordable/social, lots/dwellings, etc.;

How the contribution will be achieved and secured, including the identification of intended agencies, the owner/s of land and the responsible authority entering into an agreement pursuant to section 173 of the Planning and Environment Act 1987, timeframes, built form, and a response teach of the matters specified by the Minister by notice published in the Government Gazette in accordance with section 3AA(2) of the Planning and Environment Act 1987;

Staging requirements to ensure that social housing and affordable housing are provided in a timely manner as development occurs; and,

Affordable housing principles to ensure contribution provides a range of lot sizes or housing types, promotes an integrated and equitable distribution of housing options across the precinct, and, where relevant, delivers dwellings that are functionally and visually distinct from one another.

G15

Affordable housing, including social housing, where provided should be located across the precinct, including in high amenity areas close to services, public transport and community facilities, and provide for a range of housing typologies.

3.1.2 HOUSING DIVERSITY, DENSITY & CHOICE

GUIDELINES

G16

The Residential ESD Design Guidelines should contain sustainability provisions including, but not limited to:

- Urban heat mitigating roof design and shading structures that have a solar reflectance index (SRI) of:
  - For roofing with less than 15 degree pitch, a three year SRI of minimum 64.
  - For roofing with a pitch of greater than 15 degrees, a three-year SRI of minimum 34.
- Residential lots to provide a dedicated electrical circuit terminating in a garage or carport that is capable of supporting a minimum 7kW (32A) Electric Vehicle Charging Point (EVCP).
- Solar photovoltaic (PV) system with the following minimum capacity:
  - **Single Dwelling:** 3kW up to two bedrooms, with additional capacity provided for each additional bedroom, or
  - **Apartment Building:** either 25W per square metre of site coverage, or 1kW per dwelling.

    Note: neighbourhood scale renewable energy generation will be considered as an alternative to individual solar PV systems in any Residential ESD Design Guidelines.
- Or a suitable alternative to the satisfaction of the responsible authority.

T3. HOUSING DELIVERY GUIDE

LAND USE	HOUSING VISION	HOUSING TYPOLOGY	APPLIED ZONE	MAX. NO. OF STOREYS (EXCLUDING BASEMENTS)
Housing within the Neighbourhood Activity Centre (NAC)	The NAC will serve as the retail core of the precinct. High residential densities alongside retail and commercial use are encouraged to maximise the number of people living within walking distance of the NAC. Dwellings and apartments are designed to provide high levels of amenity to residents.	The mix of dwelling typologies which integrate with retail and commercial uses should include, but is not limited to: • Compact housing forms • Shop top housing • Apartments	Commercial 1 Zone	N/A
Amenity Area	Increased densities are supported in these locations given their proximity to the NAC, transport, open space and other amenities. Proponents are encouraged to test and implement new housing typologies.	Housing typologies will vary to include a range of types and forms to create diversity and support medium to high residential densities. The mix of dwelling typologies should include, but is not limited to: • Low-rise apartments • Townhouses • Soho-type dwellings • Co-housing Combined subdivision/ development applications within super lots are strongly encouraged, particularly on land adjacent the CCC/CCB to ensure that developments are not occurring in isolation of each other and provide cohesive and well- designed built form outcomes.	Residential Growth Zone	6
			General Residential Zone (Schedule 1)	3
Mixed Use Area (MUA)	MUA support non-residential and residential uses in the same development. Non-residential uses compatible in a residential environment, such as small offices and cafes, are encouraged on the ground floor of developments.	The mix of typologies should include, but is not limited to mixed-use developments that incorporate non- residential uses at the ground floor with shop top housing.	Mixed Use Zone	6
Conventional Residential Area (CRA)* *All residential land outside the amenity area, regardless of underlying applied zone.	CRA will provide for traditional suburban lots. Dwelling design should create variation in housing form and design to create unique neighbourhoods and add visual interest. Three storey development is encouraged.	The mix of dwelling typologies should include, but is not limited to: • Single dwellings • Townhouses • Detached housing • Semi-detached housing (2-3 storeys)	General Residential Zone (Schedule 1)	3

T4. DWELLING DENSITY TARGETS

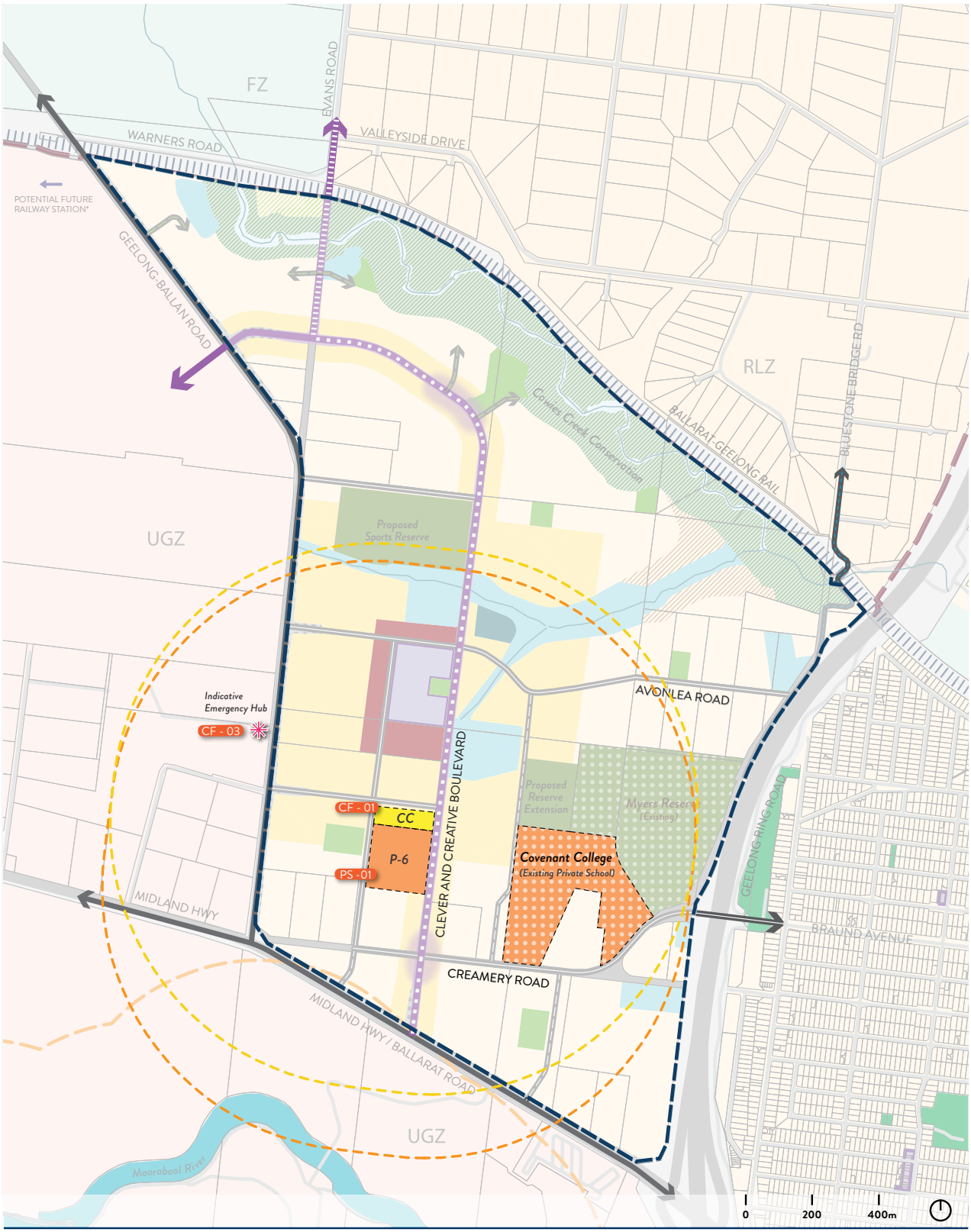
LAND USE AS PER PLAN 8 HOUSING	APPLIED ZONE	MINIMUM DENSITY (DWELLINGS/HA)
Neighbourhood Activity Centre (NAC)	Commercial 1 Zone	23
Amenity Area	Mixed Use Zone, Residential Growth Zone & General Residential Zone (Schedule 1)	23
Conventional Residential Area (CRA)* *All residential land outside the amenity area, regardless of underlying applied zone.	Residential Growth Zone & General Residential Zone (Schedule 1)	17

3.1.3 COMMUNITY FACILITIES & EDUCATION

Social infrastructure is the fabric of our community. It refers to the places and spaces that bring us together, foster social cohesion, stay active, learn new skills and access important services. Social infrastructure is essential for the health, wellbeing and economic prosperity of the community. The PSP will support one government primary school, a non-government school and an Early Years Hub.

The Early Years & Community Hub will benefit from proximity to the CCB, NAC Precinct, open space and recreational transport links. The facilities will provide a strong civic presence in the community, reflect cultural heritage and demonstrate best practice sustainable design.

P9. COMMUNITY FACILITIES & EDUCATION



LEGEND

- Precinct Boundary
- CC Early Years & Community Hub
- 800m Community Facility Catchment
- P-6 Government Primary School
- 800m Government Primary School Catchment
- Existing Private School
- Emergency Hub (Indicative)

3.1.3 COMMUNITY FACILITIES & EDUCATION

REQUIREMENTS

R12

The design and siting of community facilities and schools must be generally in accordance with *Plan 9 Community Facilities & Education* and *Table 5 Community Facilities Delivery Guide* aand respond to and address the following:

- The CCC/CCB and adjacent road network;
- *Section 3.2.1 Complete Streets* as appropriate; and
- Prioritise walking and cycling access.

R13

If abutting the CCC/CCB, community facilities and schools must be designed to front (main entrance) the CCC/CCB with car parks and any vehicular entries located away from the main entry.

R14

In accordance with *Plan 9 Community Facilities & Education*, proposed school sites must have a minimum of two road frontages. At least one frontage must be a connector road to provide for student drop-off/pick up zones and on-street indented parking in addition to other street functions.

R15

Any road abutting a school or community facility must be designed in accordance with *Appendix 2 Complete Streets* and be designed to:

- Achieve slow vehicle speeds;
- Provide pedestrian and cyclist priority; and
- Have safe pedestrian crossing points.

R16

New community facilities or an education centre with a gross floor area that is equal to or greater than 2,000 square metres must commit to the use of a best practice environmental performance rating tool, such as a Green Star Buildings, that is equivalent to net zero in operation (i.e. 4 stars), or an equivalent rating achieved through a similar tool, to maximise building sustainability performance and contribute to Victoria's net zero emissions target.

An application for buildings or works related to the above must be accompanied by a letter of commitment issued by the relevant best practice environmental performance rating tool to the satisfaction of the responsible authority.

Prior to occupation of the development, a certificate of rating issued by the relevant best practice environmental performance rating tool must be submitted to the satisfaction of the responsible authority.

GUIDELINES

G17

Subdivision and development should facilitate integration of community facilities, schools and active (sports) reserves where they are co-located and promote:

- Integration with neighbouring facilities to maximise efficiencies through the sharing of car parking and other complementary infrastructure;
- Out-of-hours use, street activation and permeability; and
- Safe and convenient pedestrian and cyclist shared path access.

G18

The design of community facilities should:

- Maximise land use efficiency through multi-storey building formats and through shared (and reduced) car parking;
- Include extensive canopy tree planting, bollards and/or similar unobtrusive structures, where appropriate, as a security perimeter against vehicular threats;
- Encourage flexibility in the range of uses which can occur at the site and allow for future adaptability and shared use of spaces;
- Incorporate appropriate opportunities for:
  - urban food production, community gardens and associated infrastructure (garden beds, vertical herb gardens, sheds, water tanks and compost)
  - spaces for community art making, performance, rehearsal, storage and/or exhibition.
- Minimise high fencing to encourage out-of-hours use; and
- Be designed to be adaptable, universally accessible, provide a sense of place and sustainable.

G19

Childcare, education, medical or similar facilities not shown on *Plan 9 Community Facilities & Education* should be located within the NAC Precinct or front the CCC/CCB, unless otherwise agreed by the responsible authority.

G20

Community facilities, schools, and active (sports) reserves that are co-located should be designed to maximise sharing opportunities of car parking and other complementary infrastructure, unless otherwise agreed to by the responsible authority.

T5. COMMUNITY FACILITIES DELIVERY GUIDE

	AREA (HA)	TYPE	POTENTIAL SERVICES	LOCATIONAL ATTRIBUTES
PS01	3.5	Proposed Government Primary School	N/A	The school is located to the south of the Early Years & Community Hub fronting the CCB. The school will service the precinct and should be co-designed with the Early Years & Community Hub.
CF01	1	Early Years & Community Hub	The Early Years & Community Hub consists of a Multipurpose Community Centre and Early Learning Centre. The Multipurpose Community Centre allows for a neighbourhood house program, flexible community meeting spaces including community kitchen, co-working spaces and community garden. The Early Learning Centre is integrated with the Multipurpose Community Centre and provides for maternal and child health, kindergarten programs, family support services and a multipurpose space for playgroups.	This facility is located north of PS01 (a proposed government primary school) and is accessible via the CCB and a north-south connector road. This facility should be designed in conjunction with PS01.

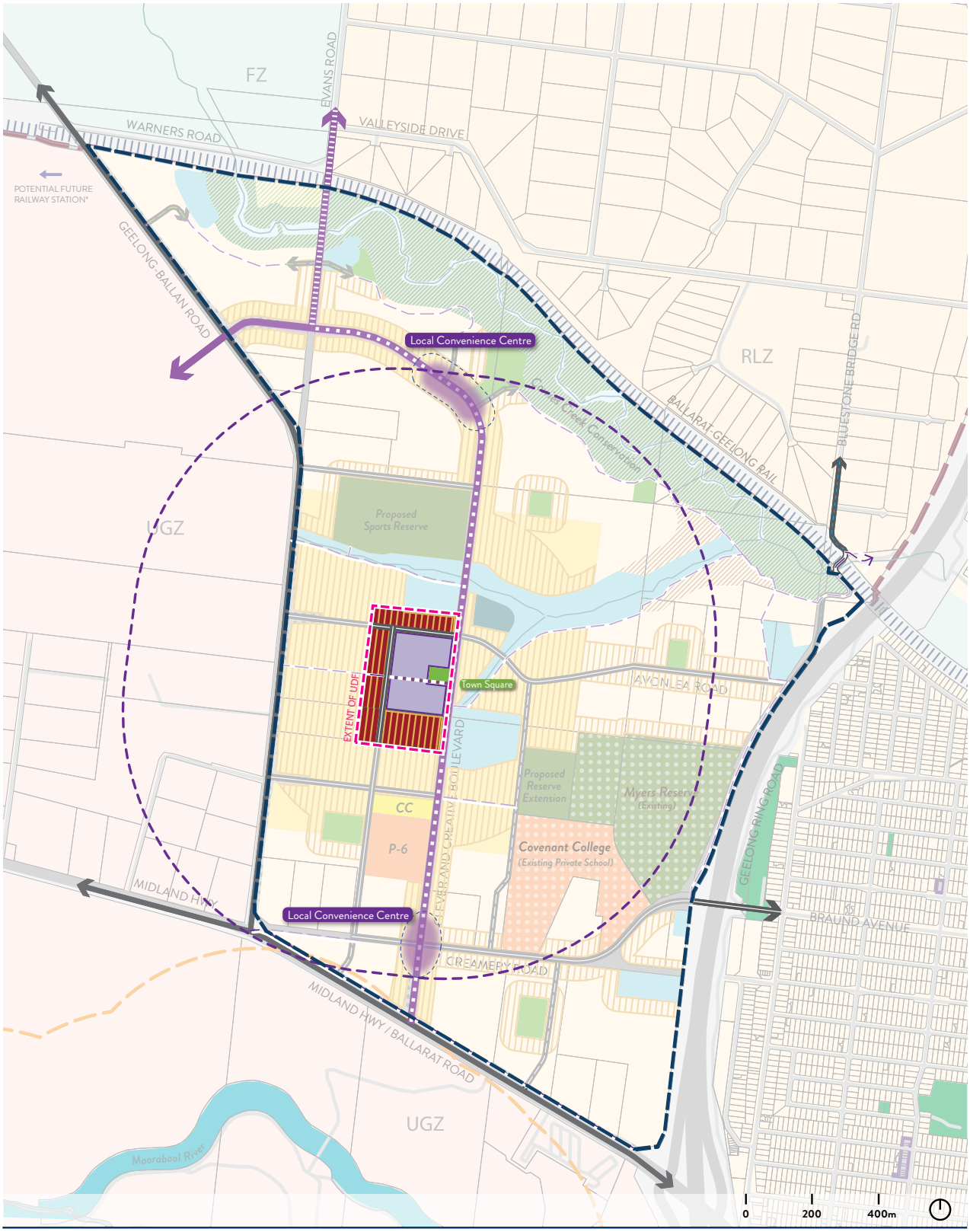
3.1.4 ACTIVITY CENTRES & EMPLOYMENT

The PSP is supported by a centrally located Neighbourhood Activity Centre. The NAC Precinct, shown on *Plan 10 Activity Centres* is formed by the Activity Centre, Town Square (Open Space), and Mixed Use Area.

The design of the NAC Precinct will reflect and respond to the natural features of the precinct and Aboriginal cultural values and heritage. The NAC Precinct will achieve best practice ESD and support the transition to a zero operational carbon neighbourhood.

The NAC Precinct will be a vibrant activity centre that supports the emerging needs of the community and accommodates a range of retail, commercial and community focused uses, start-ups and innovative businesses as well as a diverse housing mix.

P10. ACTIVITY CENTRES



LEGEND

- Precinct Boundary
- NAC Precinct Boundary (Extent of UDF)
- Mixed Use Zone (MUZ)
- Amenity Area
- Neighbourhood Activity Centre (C1Z)
- 800m NAC Catchment
- Local Convenience Centre (RGZ)
- Town Square
- Key Pedestrian Street

3.1.4 ACTIVITY CENTRES & EMPLOYMENT

REQUIREMENTS

R17

Prior to the issue of a planning permit for the subdivision or development of land within the NAC Precinct (as shown on *Plan 10 Activity Centres*) an Urban Design Framework (UDF) plan for the entire NAC Precinct must be submitted to and approved by the responsible authority.

Once approved, the UDF plan will guide future land use and development in the NAC Precinct.

R18

The UDF plan must:

- Demonstrate how the vision and design intent in *Appendix 4 - Table 20 NAC Precinct Key Design Intent* will be achieved. Design elements may be altered;
- Address and respond to *Appendix 4 - Table 21 Activity Centre & Commercial Development Design Principles;*
- Address and respond to all other relevant requirements and guidelines in the PSP pertaining to the different land uses in the NAC Precinct such as housing, open space and community facilities and *Section 3.2.1 Complete Streets*, *Section 3.6.1 Urban Greening* and *Section 3.8 Delivery*;
- Demonstrate how the design of the NAC Precinct:
  - Achieves a main street environment along the length of the CCB and the key pedestrian street abutting the NAC Precinct;
  - Delivers a civic focussed town square;
  - Integrates and connects different uses intended in the NAC Precinct;
  - Allows for the long-term evolution and growth of the NAC Precinct to meet the changing demands of the market and uses such as small local enterprises
  - Provides for vehicular access to development within the NAC from the CCB and the Connector Road, and not from local streets; and
  - Provides for cycle connections to the surrounding On Road Major Bicycle Paths and Recreational Transport Links.
- Set out clear and specific strategies, actions and guidelines for the development of the NAC Precinct that may be used as an assessment tool for future development applications within the precinct, including built form massing and architectural guidelines, and a landscape and public realm master plan;
- Determine appropriate areas for high and medium density housing and mixed-use development within the NAC Precinct and demonstrate how minimum dwelling densities will be achieved;
- Include a staging and implementation plan;
- Outline provisions for car parking including principles and requirements on the location and design of parking areas (including location of EVCPs), minimising off-street car parking, reducing and concealing the footprint of any on-grade car parking areas, and maximising shared and consolidated car parking opportunities;
- Set out arrangements for the provision of service areas for delivery and waste disposal, including access for larger vehicles and measures to minimise the impact on adjoining neighbourhoods, and enable the safety of pedestrians and vehicle users; and
- Address the relevant sections of the City's Positive Ageing Strategy including but not limited to ensuring accessibility for all ages;

all to the satisfaction of the responsible authority.

R19

Commercial or mixed use buildings that are equal to or greater than 2,000 square metres gross floor area must commit to the use of a best practice environmental performance rating tool, such as a Green Star Buildings, that is equivalent to net zero in operation (i.e. 4 stars), or an equivalent rating achieved through a similar tool, to maximise building sustainability performance and contribute to Victoria's net zero emissions target.

An application for buildings or works related to the above must be accompanied by a letter of commitment issued by the relevant best practice environmental performance rating tool to the satisfaction of the responsible authority.

Prior to occupation of the development, a certificate of rating issued by the relevant best practice environmental performance rating tool must be submitted to the satisfaction of the responsible authority.

R20

An application for building and works of new community Land use and development within the Local Convenience Centres (LCC) must demonstrate how the proposed design has appropriately considered and responded to the Design Principles in *Appendix 4 – Table 21 Activity Centre & Commercial Development Design Principles* and to existing views and local features including but not limited to the Coolangatta Homestead as per *Plan 4 Precinct Features* unless otherwise approved by the responsible authority.

3.1.4 ACTIVITY CENTRES & EMPLOYMENT

GUIDELINES

G21

Retail and commercial floor space may be increased beyond the threshold in *Table 6 Activity Centres* as part of permit applications for subdivision and development within the NAC Precinct or within the LCCs, where all the following criteria are met and supported through an economic assessment completed by a suitably qualified person:

- The increased floorspace must not impact the role and function of existing centres in the Geelong retail centre hierarchy (as per Clause 17.02 of the Greater Geelong Planning Scheme) and the viability of existing/planned activity centres across the Northern and Western Geelong Growth Areas;
- The increased floorspace must not impede on the ability to create walkable 20-minute neighbourhoods across the PSP;
- The increased floorspace is required to support changing economic trends and needs of the community;
- The development incorporates housing, such as apartments, shop top/multi storey housing and high quality town houses, particularly if the increased floor area is requested in an area primarily designated for residential use;
- The design provides additional quality built form and development outcomes and/or other community or ESD benefits; and
- The minimum dwelling density per hectare can still be achieved.

all to the satisfaction of the responsible authority.

G22

Subdivision layouts should provide for a range of lot configurations to cater for various land uses, including but not limited to small local enterprises.

G23

In addition to the requirements of Clause 17.02-2L, out- of- centre commercial development should:

- Be located on an arterial road or along the CCC/CCB
  - Where located on an arterial road, all vehicular access must be directly from the arterial road and not from surrounding residential streets.
  - Where located on the CCB, development must provide direct pedestrian access from the CCB. Vehicular crossovers may only be from the nominated side of the CCB where permitted. Access from residential streets behind the CCB is not acceptable.
- Provide small-scale day-to-day goods and services that meet localised needs, rather than competing with the designated activity centres.
- Be designed in response to the Activity Centre Design Guidelines in *Appendix 4 – Table 21 Activity Centre & Commercial Development Design Principles.*

T6. ACTIVITY CENTRES

LAND USE	RETAIL FLOOR SPACE	COMMERCIAL FLOOR SPACE	LOCATION & ANCILLARY USES
Neighbourhood Activity Centre (NAC)	**7,500 sqm**	**2,500 sqm**	Located centrally within the NAC Precinct, fronting the CCB and co-located with the mixed use amenity area and district community park. Provides for a full line supermarket and specialty retail shops. Other uses such as offices, shared spaces, and medical uses are encouraged to support a vibrant centre. Large format retail uses, service stations and drive-through establishments are discouraged.
Local Convenience Centre (LCC) – North	**750 sqm (including shop)**	**250 sqm**	Located along the CCB, situated near the Coolangatta Homestead. Retail and commercial uses are encouraged on the ground floor level, with residential uses above. Full line supermarkets and large format retail uses are discouraged.
Local Convenience Centre (LCC) – South	**750 sqm (including shop)**	**250 sqm**	Located on the CCB at the intersection with Creamery Road. Retail and commercial uses are encouraged on the ground floor level, with residential uses above. Full line supermarkets and large format retail uses are discouraged.

Note: Commercial development outside the designated NAC and LCC areas is to be considered Out of Centre commercial development.

T7. ANTICIPATED EMPLOYMENT CREATION IN THE PRECINCT

JOBS IN NAC	WORK FROM HOME	SOCIAL INFRASTRUCTURE	TOTAL
479	196	195	**870**

Indicative numbers, to be confirmed prior to finalisation.

3.2 STREETS & PUBLIC REALM

3.2.1 Complete Streets 68
3.2.1.1 Public transport 73
3.2.1.2 Cycling 74
3.2.1.3 Parking 76

3.2.2 Open Space Systems 78

3.2.1 COMPLETE STREETS

The PSP proposes a suite of street types, named 'Complete Streets', which are designed to support a street network that accommodates canopy trees and water sensitive urban design, provides a human scale experience, and prioritises walking and cycling.

The PSP is consistent with the Department of Transport and Planning's Movement and Place Framework which provides guidance for planning quality outcomes that achieve efficient movement and balance competing travel modes. Streets are more than movement corridors but can also be used as a place for people to dwell, stay, linger, shop and play. The PSP is consistent with Clause 18 Transport within the Planning Policy Framework in the Greater Geelong Planning Scheme.

P11. STREET NETWORK

LEGEND

- Precinct Boundary
- Railway Corridor
- Potential Future Railway Station
- Future Road Infrastructure
- Pedestrian Operated Signalised Crossing
- Clever & Creative Corridor
- Clever & Creative Corridor (Evans Road Variation)
- Clever & Creative Boulevard
- Signalised Intersection
- Left In - Left Out
- Potential Left In - Left Out
- Existing Road being Retained
- Existing Arterial Road
- Connector Road (25m)
- Indicative Local Access Street
- Conservation Interface Street
- Bluestone Bridge Road
- Existing Bridge (Active Travel Upgrade)
- Existing Road under Bridge (Active Travel Upgrade)
- Indicative Culverts
- Speed Limit on the Clever & Creative Network

3.2.1 COMPLETE STREETS

REQUIREMENTS

R21

The design of subdivisions must be generally in accordance with the movement network nominated in *Plan 11 Street Network* and the street cross sections in *Appendix 2.1 - Table 15 Street Types & Attributes* and *Appendix 2.2 Street Types & Cross Sections*, to the satisfaction of the responsible authority.

R22

Where more than one street is proposed in a subdivision layout, a variety of cross-sections which respond to *Appendix 2.1 - Table 15 Street Types & Attributes* and *Appendix 2.2 Street Types & Cross Sections,* must be utilised in a subdivision layout in response to the context and use of the land, to provide a legible and permeable street network which prioritises walking and cycling and reduces car use.

R23

The design of all subdivisions and streets must provide:

- A permeable, direct and safe street network which encourages walking and cycling particularly near schools, community facilities and activity centres; and
- Convenient access to local points of interest and destinations for effective integration with neighbouring properties.

R24

Recreational transport links (shared cycling/pedestrian paths) must be delivered in accordance with the network shown on *Plan 11 Street Network* using one or a combination of the following, to the satisfaction of the responsible authority:

- Pedestrian street generally in accordance with *Appendix 2.2 Street Types & Cross Sections*;
- A minimum 3m wide shared path delivered as part of the road reserve; and/or
- An off-road 3m wide shared path.

R25

Recreational transport links (including crossings) along waterways and drainage assets must be:

- Located above the 1:100 year flood level, to maintain hydraulic functions of the waterway to the satisfaction of the responsible authority.
- Designed in accordance with all biodiversity approvals and have regard for protection and enhancement of habitat and fauna movement.
- Allow sufficient design width to accommodate emergency vehicle access and include Services Locations.

R26

Vehicle access to lots fronting and/or abutting the western interface of the CCB must be provided via rear or side access lanes, places or streets.

R27

Vehicle access to a lot that is six metres or less in width must be provided via a rear laneway unless otherwise agreed by the responsible authority. Configuration of vehicle access to all other lots must ensure there is sufficient separation between crossovers to allow for the planting of street trees in accordance with the objectives and requirements of this PSP and the City of Greater Geelong Vehicle Crossings Code of Practice & Guidelines (2022) or as amended.

GUIDELINES

G24

Placemaking design concepts, pedestrian amenities and other embellishments are encouraged within Micro Streets and Pedestrian Streets (See *Appendix 2 Complete Streets*). The installation of any embellishments should not infringe on the pedestrian clearway nor be to the detriment of integrated water management outcomes.

G25

The frequency of vehicular crossovers on protected bike lanes and verges of connector roads should be minimised, as appropriate, through a combination of:

- Rear loaded lots with laneway access;
- Vehicular access from side streets;
- Combined or grouped crossovers;
- Increased lot widths; and/or
- Consolidated parking areas separate to dwellings.

G26

Consistent wayfinding signage should be utilised across the precinct and use clear visual imagery including walking time and distances to key destinations, in accordance with the guidelines outlined in Wayfound Victoria (2020) or as amended.

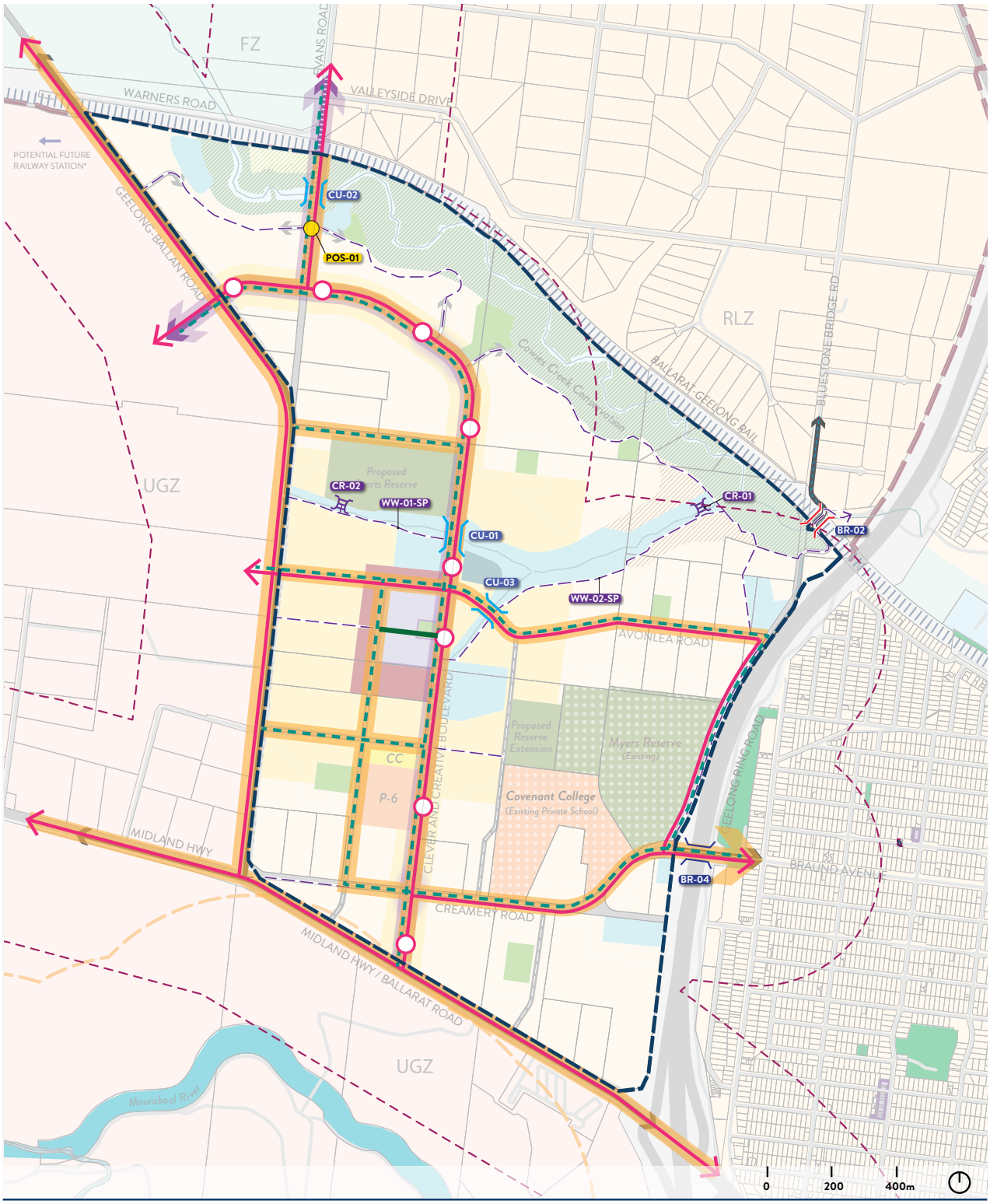
G27

Recreational transport links (shared cycling and pedestrian paths) should utilise shared paths incorporated in the design of drainage assets and road reserves, where appropriate; and avoid duplicating infrastructure.

G28

Cul-de-sacs should be avoided in the design of subdivision layouts. When provided, cul-de-sacs should include connections to the surrounding pedestrian network by using a Pedestrian Street in accordance with *Appendix 2.2 Street Types & Cross Sections.*

P12. PUBLIC & ACTIVE TRANSPORT



LEGEND

- Precinct Boundary
- Railway Corridor
- Potential Future Railway Station
- On Road Major Bicycle Path
- Public Transport Link (Bus Route)
- Indicative Public Transport Stop
- Bus Capable Street
- Pedestrian Operated Signalised Crossing
- Clever & Creative Corridor
- Key Pedestrian Street
- Indicative Recreational Transport Links
- 400m Bus Capable Street Buffer
- Existing Bridge (Active Travel Upgrade)
- Existing Road under Bridge (Active Travel Upgrade)
- Indicative Culverts

3.2.1.1 PUBLIC TRANSPORT

REQUIREMENTS

R28

Any bus capable carriageway and/or street suitable for public transport systems, as nominated in *Plan 12 Public & Active Transport*, must be constructed in accordance with the Department of Transport's Public Transport Guidelines for Land Use and Development, or as amended, to the satisfaction of the responsible authority and/or the relevant authority.

R29

Streets, intersections, and transit stops provided must be generally in accordance with *Table 16 Intersection Requirements, Table 17 Complete Streets General Requirements* and *Table 21 Transit & Transit Stop Design Requirements* (all appendices), respectively, to prioritise the efficiency of transit services over traffic and avoid conflict between pedestrians and other road users, all to the satisfaction of the responsible authority.

GUIDELINES

G29

Wombat crossings (raised pedestrian crossings), or appropriate alternative treatments or design measures, should be located to enable safe access to key destinations e.g., schools, community facilities, activity centres and local parks as appropriate and in accordance with *Table 16 Intersection Requirements,* to the satisfaction of the responsible authority.

G30

Transit stops should be prioritised in commuter-friendly convenient locations adjacent to key destinations e.g. activity centres, schools, community centres and local parks.

G31

Where bus stops and/or other public transport system facilities are located, they should be provided in accordance with the Department of Transport's Public Transport Guidelines for Land Use and Development (or as amended), to the satisfaction of the responsible authority.

3.2.1.2 CYCLING

REQUIREMENTS

R30

Bicycle parking infrastructure must accommodate a diversity of bicycle types and sizes, including cargo bicycles and electric bicycles, as appropriate.

R31

Bicycle parking must be provided in accordance with *Table 8 Bicycle Parking Minimums* or be accompanied by a Bicycle Parking Demand Assessment that addresses the following matters, to the satisfaction of the responsible authority:

- The variation of bicycle parking demand likely to be generated by the proposed use;
- The short-stay and long-stay bicycle parking demand likely to be generated by the proposed use;
- The availability of public transport within reasonable proximity to the land;
- The anticipated bicycle ownership rates of likely or proposed visitors to or occupants (residents or employees) of the land; and,
- The provision of public bicycle parking facilities within reasonable proximity to the land.

GUIDELINES

G32

Recreational transport links (shared pedestrian and cycling paths) in addition to those nominated in *Appendix 2 Complete Streets* should be lit in accordance with the City's Public Street Lighting Policy and be supported by passive surveillance.

G33

Local streets should include traffic calming measures to encourage low driving speeds, without reducing the connectivity of the street network for people walking and cycling.

G34

Visitor or shopper bicycle parking provided in accordance with *Table 8 Bicycle Parking Minimums* should be located in convenient, undercover, well-lit locations near the building entrance.

T8. BICYCLE PARKING MINIMUMS

LAND USE	LONG STAY BICYCLE PARKING (RESIDENTS OR EMPLOYEES)	SHORT STAY BICYCLE PARKING (VISITORS)
Residential	• 1 space to a 1- and 2-bedroom dwelling • 2 spaces per 3-bedroom dwelling • 1 space per bedroom for dwellings with no car parking	As per Clause 52.34
Retail Premises (including shop)	1 space per 400sqm	As per Clause 52.34
Office	9 spaces per 800sqm	As per Clause 52.34
All other uses not listed in this table	Other uses as per rates listed in Clause 52.34 of the Greater Geelong Planning Scheme.	

3.2.1.3 PARKING

REQUIREMENTS

R32

Car parking must not:

- Dominate the building facade/street interface;
- Create unsafe places to walk or cycle.

to the satisfaction of the responsible authority or relevant authority.

R33

Loading areas and all other service areas must not have any interface with the CCC/CCB.

On all other streets, loading and service areas must be on the side, rear or screened to minimise views to the street.

The treatment of loading and service areas must be integrated into the building design to provide visual interest.

GUIDELINES

G35

Off-street parking provided in activity centres should be co-located and consolidated into a shared, multi-user area to promote efficiency.

G36

Car parking areas should be designed to allow passive surveillance and ensure public safety through positioning and lighting, to the satisfaction of the responsible authority.

G37

Car parking areas should be designed to provide dedicated pedestrian routes and adequate landscaping areas to the satisfaction of the responsible authority.

Geelong 2
GEELONG

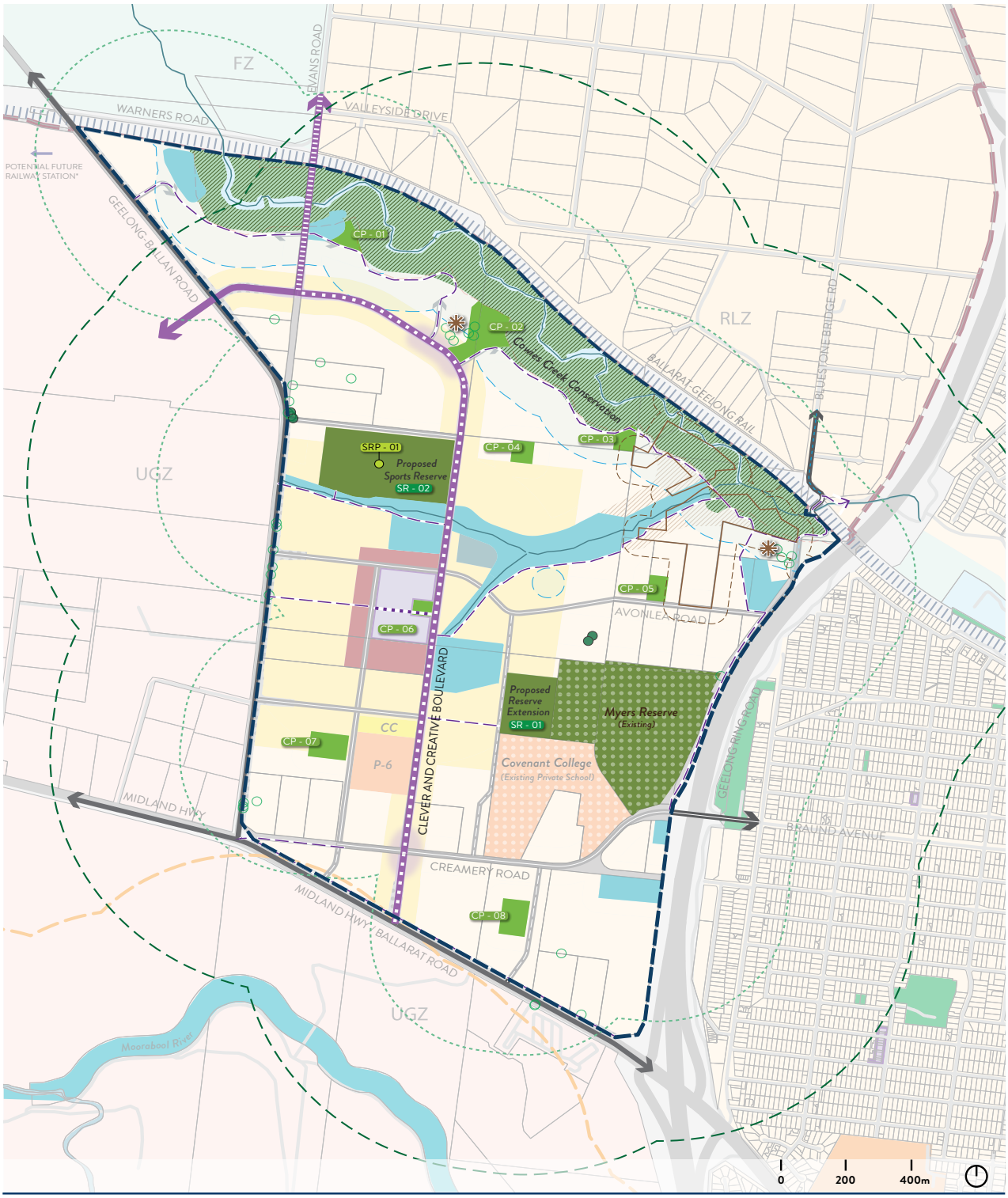
3.2.2 OPEN SPACE SYSTEMS

The open space system creates passive and structured play, recreation and sport opportunities for future neighbourhoods. Community parks and sporting reserves are located within walking distance of residential areas, and along spines of existing encumbered land, and conservation areas.

Open spaces will support tree canopy coverage and serve as destinations in the precinct's active transport network.

Community parks and sports (active) reserves will be designed to address the needs of the future community and provide neighbourhoods with a distinct sense of place and identity.

P13. OPEN SPACE SYSTEMS



LEGEND

- Precinct Boundary
- Area of Cultural Sensitivity
- Aboriginal Cultural Heritage Extent & 50m Buffer
- Heritage Homestead
- Community Park
- Proposed Sports Reserve
- Existing Sports Reserve
- Cowies Creek Conservation
- Sports Pavillion
- Waterway & Drainage Asset
- Local Park - 400m Catchment
- Open Space > 1ha - 800m Catchment
- Critical Rated Trees
- High Rated Trees
- Clever & Creative Corridor
- Clever & Creative Corridor (Evans Road Variation)
- Clever & Creative Boulevard
- Key Pedestrian Street
- Recreational Transport Links

3.2.2 OPEN SPACE SYSTEMS

REQUIREMENTS

R34

All community parks, sports (active) reserves and other public open spaces must be located, designed and developed to the satisfaction of the responsible authority in accordance with the following documents:

- *Plan 13 Open Space Systems;*
- *Plan 18 Integrated Water Management;*
- *Table 9 Open Space Delivery Guide;*
- *Appendix 3 – Table 19 Open Space Delivery Requirements* and,
- Relevant Council policy and guidelines.

R35

Where a community park as shown on *Plan 13 Open Space Systems* is located over multiple properties, the first development proponent to lodge a permit application must undertake a master plan for the entire park, to the satisfaction of the responsible authority. The proponent delivering the master plan for a local park that traverses multiple property ownerships must consult with the landowners of parcels covered by the park when preparing the plan to ensure an integrated design.

R36

Open spaces must have a road frontage to at least 3 boundaries, except where:

- The open space adjoins an alternate open space use i.e. conservation area;
- Lots directly face the open space and allow for vehicular access via a rear laneway with the provision of a 4m wide paper road fronting the open space;
- Primary pedestrian access to lots is provided via a 1.8m wide pedestrian path contained within the paper road; and
- Visually permeable and low scale fencing (less than 1.2 metres high) facilitates public safety and passive surveillance.

R37

For the purposes of Clause 53.01 of the Greater Geelong Planning Scheme, a Community Park, Urban Park or Town square within the PSP is defined as Public Open Space. All land contributed as public open space must be unencumbered and a contribution provided in accordance with *R44.*

R38

Where land is identified as a credited (unencumbered) passive open space, such as a local community park, as shown on *Plan 13 Open Space Systems* and specified in *Table 9 Open Space Delivery Guide*, if the land is:

- Equal to 2.99% of the Net Developable Area – Residential (NDAR) of the lot, the land must be transferred to Council at no cost;
- Less than 2.99% of the NDAR of the lot, the land must be transferred to Council at no cost, and a cash contribution must be made to Council to bring the total contribution to a value of 2.99% NDAR; and
- Greater than 2.99% of the NDAR of the lot, the land must be transferred to Council at no cost to Council.

Council will pay an amount to the permit applicant equivalent to the value of the land provided in excess of 2.99% NDAR, but no greater than the difference between 2.99% NDAR and the amount of land shown as a community park on *Plan 5 Future Urban Structure*.

Where a subdivision is staged, the responsible authority may agree to the release of one or more stages where the open space is in a future stage.

The value of land for equalisation purposes is to be assessed as an equivalent proportion of the value of the whole land, and in accordance with Sections 18a and 19 of the *Subdivision Act 1988*.

R39

Where a permit applicant proposes, and the responsible authority agrees, to provide unencumbered public open space in addition to that shown on *Plan 13 Open Space Systems* and *Table 9 Open Space Delivery Guide*, the land and embellishment must be provided at the development proponent's cost. The additional unencumbered public open space shall not be included nor affect the equalisation scheme.

R40

Above ground utilities (such as electricity substations, kiosk and sewer pumps) must not be located within any community parks or sports (active) reserves.

GUIDELINES

G38

Open spaces should be designed to promote a sense of place and cater for users of all genders, ages, abilities, and cultures by providing opportunities to interact in structured and unstructured recreational activities.

T9. OPEN SPACE DELIVERY GUIDE

PARK REF	AREA (HA)	TYPE	LOCATIONAL ATTRIBUTES	DELIVERY RESPONSIBILITY
CP01	0.5 ha	Local Community Park	This park is located at the intersection of Evans Road and the conservation interface street adjacent to Cowies Creek boundary. It is serviced by the street network and recreational transport links. The park will benefit from views into the Cowies Creek valley, offer an attractive resting point for pedestrians and cyclists and serve as a passive recreation space for surrounding residents.	Development Proponent
CP02	1.973 ha	Local Community Park	This park is located adjacent to the Coolangatta Homestead. It will provide passive recreation opportunities and strong views in most directions. Detailed designs should consider how the extensive views can be captured. The design of the park should integrate with the significant heritage building.	Development Proponent
CP03	0.5 ha	Local Community Park	This park is located in the northern east corner, adjacent to the Cowies Creek Conservation area boundary.	Development Proponent
CP04	0.5 ha	Local Community Park	This park is north of the waterway drainage corridor on Property 13.	Development Proponent
CP05	0.5 ha	Local Community Park	This park is in close proximity to the waterway drainage corridor north of Avonlea Road.	Development Proponent
CP06	0.296 ha	Town Square	Located on the southern side of the Pedestrian Street and adjoining the CCB to the east is the NAC town square. This park will provide an important civic programming and community gathering function for commercial/retail users, workers and residents.	Development Proponent
CP07	1.0 ha	Local Community Park	This park will predominately service the south-west of the precinct. It is located opposite the proposed government primary school surrounded by residential areas. It is connected to the precinct's recreational transport link network to connect with surrounding areas, ensuring broad accessibility.	Development Proponent
CP08	1.0 ha	Local Community Park	This park will predominately service the residential area in the south-east.	Development Proponent

PARK REF	AREA (HA)	TYPE	LOCATIONAL ATTRIBUTES	DELIVERY RESPONSIBILITY
SR01	**3.25 ha**	**District Sports Reserve**	This land will allow for the western expansion of Myers Reserve. A shared path connects to the road reserve north of Myers Reserve. It will provide district level passive components (play &/or informal recreation infrastructure) promoting activation, community usage of the sports reserve and physical activity.	City of Greater Geelong
SR02	8.644 ha	District Sports Reserve	This district reserve is located in the north-west and is bound by the CCB, a connector road, and a waterway drainage corridor. The site is connected to the precinct's active transport network with north-south and east-west links making it highly accessible. The reserve is close to the potential non-government school. It will provide district level passive components (play &/ or informal recreation infrastructure) promoting activation, community usage of the sports reserve and physical activity.	City of Greater Geelong

3.3 ENERGY & TECHNOLOGY

3.3.1 Sustainable Energy & Zero Carbon 86
3.3.2 Smart Cities 90

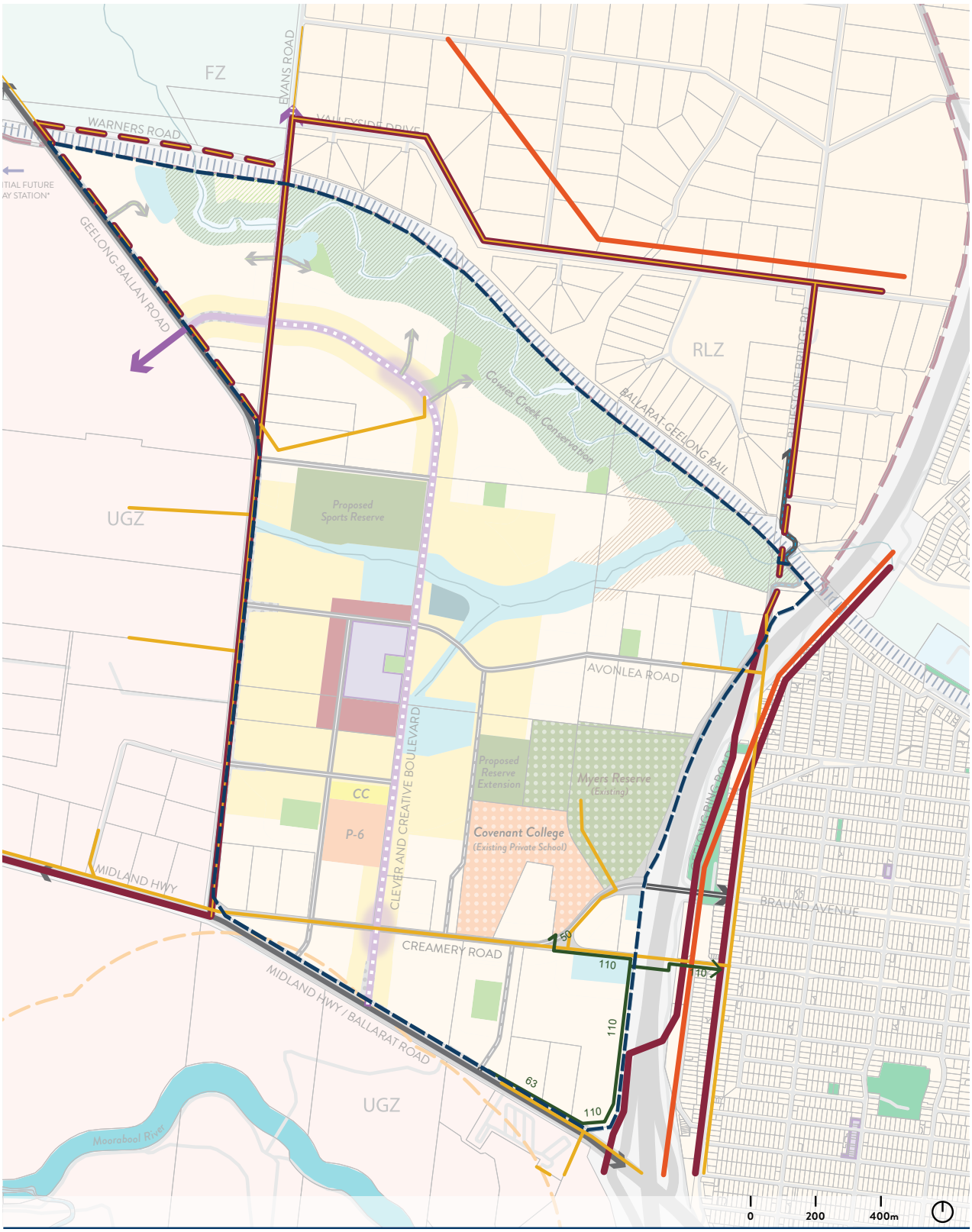
3.3.1 SUSTAINABLE ENERGY & ZERO CARBON

Communities in the precinct will be planned and designed to achieve a zero operational carbon footprint.

Applicants will be required to demonstrate how lot design, building design and renewable energy sources, combined with fully electric (no gas network) subdivisions, can contribute towards achieving zero operational carbon neighbourhoods.

Zero Carbon initiatives are voluntary at the planning permit stage.

P14. UTILITIES, ENERGY & TECHNOLOGY



LEGEND

- Precinct Boundary
- Existing AusNet Transmission Line
- Existing Powercor Distribution Feeders (22 kV)
- Existing Powercor 66 kV Overhead Feeder
- Existing Powercor 66 kV & 22kV Overhead Feeder
- Proposed Future Sub -Transmission Lines (66 kV & 22kV)
- Existing Gas Main

3.3.1 SUSTAINABLE ENERGY & ZERO CARBON

REQUIREMENTS

R41

The location of proposed trunk infrastructure must be in general accordance with *Plan 14 Utilities, Energy & Technology*, unless otherwise agreed by the relevant authority.

R42

Above ground utilities (such as electricity substations, kiosk and sewer pumps) must be located to ensure effective integration with the surrounding neighbourhood and to minimise amenity impacts, all to the satisfaction of the responsible authority and relevant authorities.

R43

A Functional Layout Plan , if required as a condition of permit, must be submitted to and endorsed by the responsible authority. The plan must show the locations of the following infrastructure, including but not limited to:

- Underground services;
- Vehicle crossovers;
- Street lights;
- Street trees (including root growth zones to achieve the relevant canopy cover and relevant passive irrigation detail);
- Future bus stops and/or other public transport facilities;
- Bicycle parking infrastructure (e.g., bicycle racks);
- Shared pedestrian and bicycle paths;
- All local traffic management items;
- Utility installations on or adjacent to public reserves; and

The cross sections must also nominate above and below ground placement of services, streetlights, and trees and passive irrigation.

Where relevant, any smart city infrastructure to be provided in accordance with the *NWGGA Smart City Technical Specifications (2022)* or as amended must be shown.

R44

All new electricity supply infrastructure and existing above ground electricity cables (excluding substations and cables with voltage of 66 kV or greater) must be placed underground as part of subdivision works and upgrades to existing roads.

GUIDELINES

G39

The design and placement of utilities and services should be in general accordance *Appendix 5 - Table 22 Services Placement Guidelines* and demonstrate how the relevant requirements and guidelines from *Section 3.6.1 Urban Greening* in this PSP are met, all to the satisfaction of the relevant authorities.

G40

Above ground utilities should be located outside of key view lines and be screened.

G41

Opportunities for alternative infrastructure and utility delivery models that achieve best practice ESD and support the development of zero operational carbon neighbourhoods are encouraged.

G42

An application for subdivision or building and works (whichever comes first) should be accompanied by a Zero Carbon Operational Energy Plan which demonstrates how the subdivision or works supports the development of a zero carbon operational energy precinct through consideration of, but not limited to:

- Subdivision and infrastructure design.
- Lot and neighbourhood scale renewable energy generation and storage.
- Green energy power purchasing agreements.

Infrastructure proposed to manage and monitor energy loads.

G43

Any non-residential subdivision or development within the PSP should not connect to any existing or future reticulated gas networks.

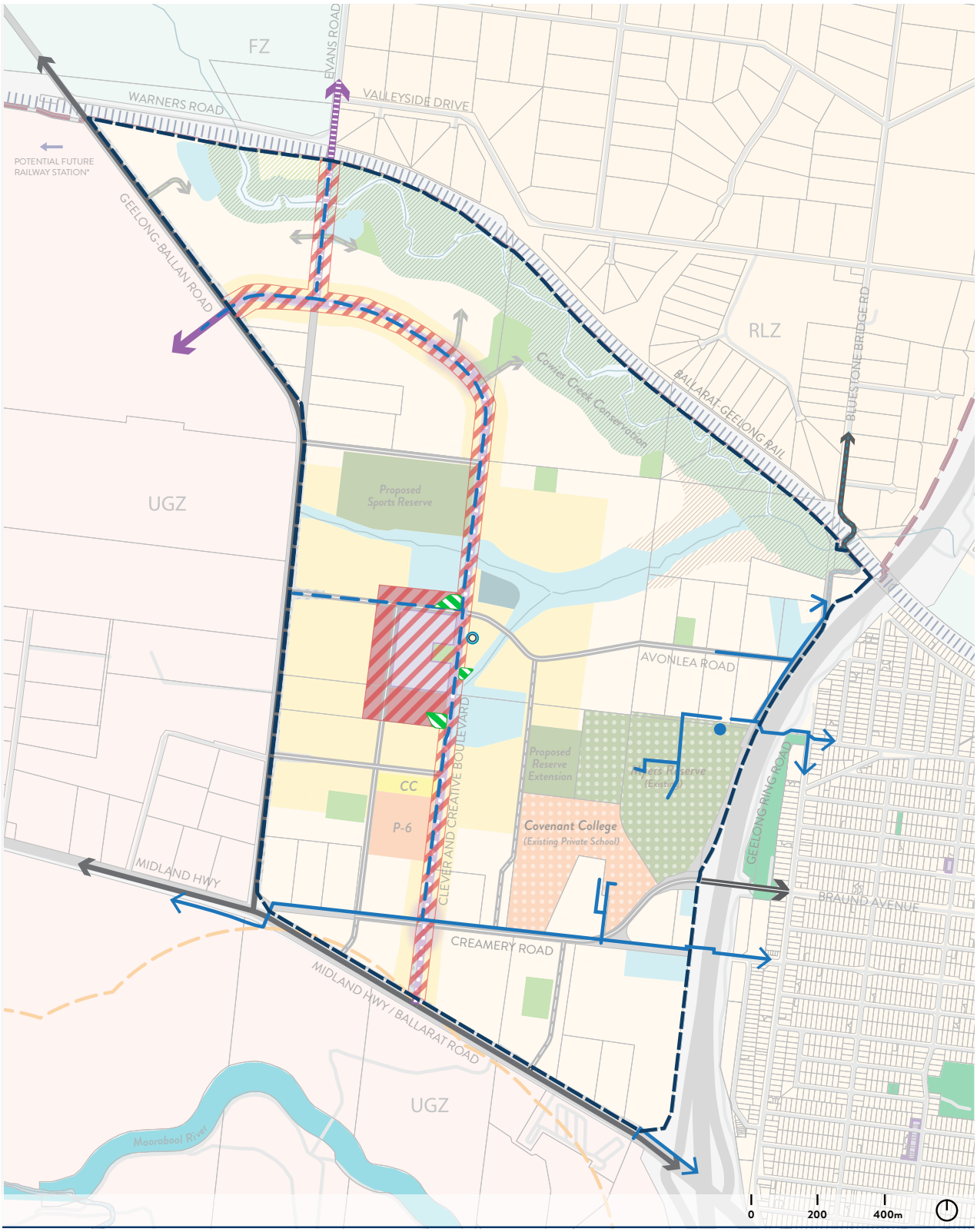
3.3.2 SMART CITIES

The precinct will use smart city infrastructure to monitor and assess the precinct's sustainability performance, support and enable the adoption of smarter and cleaner technologies, and help monitor and manage local assets and services to allow for forward planning and improved decision-making.

The PSP seeks to encourage the provision of base infrastructure required for smart technologies is provided at subdivision, to enable the cost-effective installation of smart technologies in the future.

Innovative approaches to sustainable transport that support climate resilience and reduce greenhouse gas emissions will be encouraged.

P15. SMART CITIES & DIGITAL CONNECTIVITY



LEGEND

- Precinct Boundary
- Property Parcel

SMART CITIES & DIGITAL CONNECTIVITY

- Conduits & Smart Lighting
- Existing NBN Network
- Proposed Smart Pole Locations
- Proposed Trunk Infrastructure
- LoRaWAN Gateway
- Existing CMTS Site (Mobile Phone Tower)

3.3.2 SMART CITIES

REQUIREMENTS

R45

Any proposed smart city infrastructure must in accordance with the NWGGA Smart City Technical Specifications (2022) or as amended, and *Plan 15 Smart Cities & Digital Connectivity*, to the satisfaction of the responsible authority.

This includes but is not limited to the design and placements of conduit lines, branches and pits, LoRAWAN Gateways and smart street poles as shown on *Plan 15 Smart Cities & Digital Connectivity*.

R46

Any proposed smart infrastructure (both above and below ground) as shown on *Plan 15 Smart Cities & Digital Connectivity* must integrate into the public realm and natural landscape.

The infrastructure must not detract from visual amenity of the public realm or inhibit convenient pedestrian and vehicular connections and accessibility.

Infrastructure must be designed in a way that its maintenance does not impact pedestrian or vehicular traffic or other infrastructure.

GUIDELINES

G45

Where possible, telecommunications conduits should be co-located with other utility infrastructure, such as electricity, to optimise use of underground space, to the satisfaction of the responsible authority.

G46

Road design, line markings, traffic signs and other road infrastructure should, where practical meet best practice standards for autonomous vehicles including shuttle services, in accordance with the *NWGGA Smart City Technical Specifications (2022)* or as amended.

G47

Variations in pavements and landscaping should use contrasting patterns to assist vision impaired persons to easily navigate the area, aid computer machine vision, and provide future opportunity for robots, and autonomous vehicles to easily navigate the area.

G48

All pits and cabinets of utilities in the precinct should have adequate space for Internet of Things (IoT) sensors to the satisfaction of the responsible authority and other relevant authorities.

G49

Smart infrastructure should be serviced by in situ renewable energy generation and storage, such as solar PV and batteries, where possible.

G50

An application for non-residential subdivision or building and works exceeding 5,000 square metres gross floor area (GFA) should provide:

- EV charging infrastructure and signage installed for at least 5% of all off-street parking.
- At least 20 percent of off-street car parking spaces (or at least one space) that are capable of supporting the provision of an appropriate moderate speed EV charging outlet, and appropriate EV infrastructure and cabling to ensure peak demand is managed.

G51

Where possible, telecommunications conduits should be co-located with other utility infrastructure, such as electricity, to optimise use of underground space, to the satisfaction of the responsible authority.

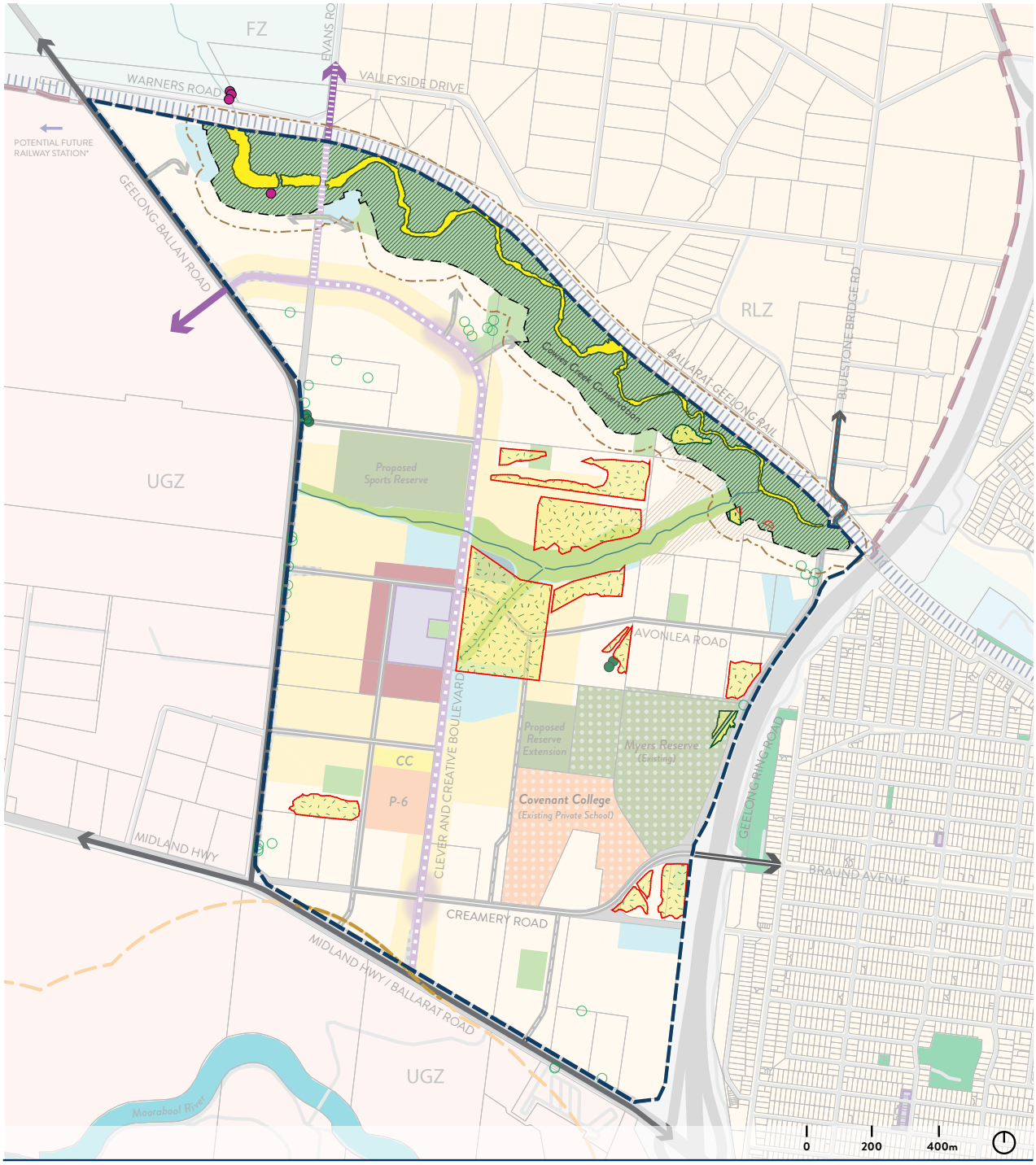
3.4 BIODIVERSITY & THREATENED SPECIES

The PSP will protect and enhance habitat values of the Cowies Creek Conservation Area including the Growling Grass Frog (Litoria raniformis), listed as Vulnerable under the EPBC Act, Adamson's Blown-grass (Lachnagrostis adamsonii), listed as endangered under the EPBC Act, and the Ecological Vegetation Classes Creekline Grassy Woodland and Plains Grassland present in the conservation area. The PSP also includes areas of Plains Grassland EVC.

The conservation area will be managed for the primary purpose of improving biodiversity values but also serve as a place of learning and cultural awareness.

All native vegetation within the precinct, including the native vegetation within the Cowies Creek Conservation Area will be retained or permitted for removal through the Creamery Road NVPP.

P16. BIODIVERSITY & THREATENED SPECIES



LEGEND

- Precinct Boundary
- Waterway Corridor
- Cowies Creek Conservation
- Cowies Creek Masterplan Extent
- 50m Cowies Creek Masterplan Buffer (Triggers Construction Environment Management Plan)
- Native vegetation with critical retention values. To be retained and managed in accordance with Creamery Road NVPP
- Native vegetation that may be removed To be managed in accordance with Creamery Road NVPP

TREE RETENTION

- Critical Rated Trees
- High Rated Trees

ECOLOGICAL VEGETATION CLASS

- Plains Grassland
- Creekline Grassy Woodland

VICTORIAN BIODIVERSITY ATLAS RECORD

- Adamson's Blown-Grass

Note: Native vegetation requirements are specified at Clause 52.17 and its schedule in the planning scheme. This plan must be read in conjunction with those provisions.

3.4 BIODIVERSITY & THREATENED SPECIES

REQUIREMENTS

R47

The Cowies Creek Conservation Masterplan Area as shown in *Plan 16 Biodiversity & Threatened Species* and identified in *Table 10 Conservation Area Attributes* must be created and managed in accordance with the following documents:

- Approvals under the *EPBC Act 1999*;
- NWGGA Biodiversity Conservation Strategy;
- *Creamery Road Native Vegetation Precinct Plan (June 2024)*;
- *Cowies Creek Landscape Masterplan (June 2024)* or as amended; and
- Any approved Cowies Creek Growling Grass Frog Conservation Management Plan or as amended.

R48

Applications for development and/or subdivision on land within the Cowies Creek Masterplan Area as shown on *Plan 16 Biodiversity & Threatened Species* must have regard to the Cowies Creek Landscape Masterplan (June 2024) or as amended.

R49

Works including earthworks, paths, in-stream pools, ephemeral soaks and street furniture within the Cowies Creek Masterplan Area as shown in *Plan 16 Biodiversity & Threatened Species* must be generally in accordance with *Plan 17 Cowies Creek Landscape Plan* and have regard to the Cowies Creek Growling Grass Frog Conservation Management Plan, to the satisfaction of the responsible authority.

Public lighting must be designed and baffled to prevent light spill and glare within and adjacent to the Cowies Creek Masterplan Area, unless otherwise agreed in writing by the responsible authority.

R50

Public lighting must be designed and baffled to prevent light spill and glare within and adjacent to the Cowies Creek Masterplan Area, unless otherwise agreed in writing by the responsible authority.

R51

All infrastructure, including additional drainage assets, and all utility services must be located outside of the Cowies Creek Conservation Area unless consistent with the Strategic Assessment or other relevant approval under *EPBC Act 1999* and agreed to by the responsible authority.

R52

Infrastructure located within the Cowies Creek Conservation Area must be designed and located in accordance with the Strategic Assessment or any other relevant approval under the EPBC Act, and generally in accordance with the *Cowies Creek Worneenanyook Landscape Masterplan (June 2024)* and agreed to by the responsible authority.

R53

Community parks, drainage corridors, waterway corridors, utilities easements and other public open spaces, including encumbered open spaces must be designed to:

- Protect and enhance biodiversity values and protect the conservation area from unplanned entry;
- Provide flexible recreational opportunities;
- Provide habitat enhancement for rare and threatened species as documented in the EHP existing conditions report, WWGA Cowies Creek Conservation Area, Growling Grass Frog Conservation Management Plan, NWGGA Biodiversity Conservation Strategy or superseding document or standard as updated, or any other relevant approval under the *EPBC Act 1999*; and
- Respond to and acknowledge Aboriginal cultural values as appropriate;

all to the satisfaction of the responsible authority.

R54

Prior to the commencement of works on land adjacent to the Cowies Creek Conservation area, wetlands for the Growling Grass Frog must be constructed as per the habitat creation and timing recommendations in the *WGGA Cowies Creek Conservation Area, Growling Grass Frog Conservation Management Plan,* and any relevant approval under the EPBC Act 1999, unless otherwise approved in writing by the responsible authority.

GUIDELINES

G52

Vegetation should be retained and protected where possible to provide habitat and movement corridors for local fauna and contribute to the character and amenity of the precinct.

G53

Where community access to the Cowies Creek conservation area is possible, the access should be sensitively designed to protect the primary conservation and landscape values of the area.

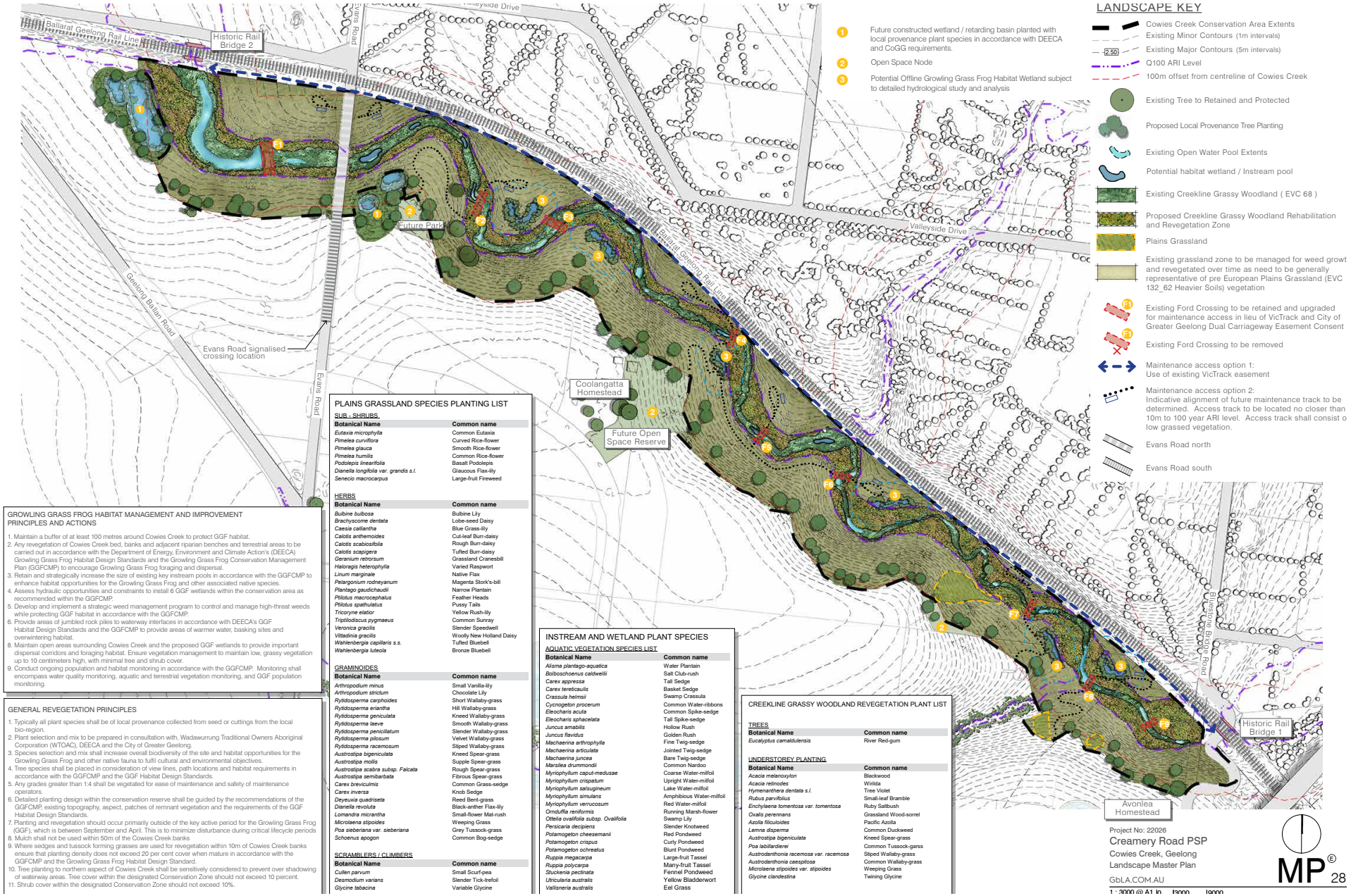
G54

Landscaping and embellishment of public open spaces should contribute to habitat for fauna.

T10. CONSERVATION AREA ATTRIBUTES

AREA (HA)	TYPE	ATTRIBUTES	DELIVERY RESPONSIBILITY
40.6	Local Conservation Reserve	The landscape character consists of a narrow waterway that weaves through rolling grassed hills. There are limited trees within the creek corridor, its vegetation mostly consists of low grasses and reed species. The primary function of the land is to serve as a conservation area for the Growling Grass Frog, listed as Vulnerable under the EPBC Act 1999 and local biodiversity. Conservation will be separated from any development by a combination of edge roads, local parks, recreational transport links and drainage assets.	City of Greater Geelong Council together with the development proponent.

P17. COWIES CREEK LANDSCAPE PLAN



PLAINS GRASSLAND SPECIES PLANTING LIST

SUB - SHRUBS

Botanical Name	Common name
Eutaxia microphylla	Common Eutaxia
Pimelea curviflora	Curved Rice-flower
Pimelea glauca	Smooth Rice-flower
Pimelea humilis	Common Rice-flower
Podolepis linearifolia	Basalt Podolepis
Dianella longifolia var. grandis s.l.	Glaucous Flax-lily
Senecio macrocarpus	Large-fruit Fireweed

HERBS

Botanical Name	Common name
Bulbine bulbosa	Bulbine Lily
Brachyscome dentata	Lobe-seed Daisy
Caesia calliantha	Blue Grass-lily
Calotis anthemoides	Cut-leaf Burr-daisy
Calotis scabiosifolia	Rough Burr-daisy
Calotis scapigera	Tufted Burr-daisy
Geranium retrorsum	Grassland Cranesbill
Haloragis heterophylla	Varied Raspwort
Linum marginale	Native Flax
Pelargonium rodneyanum	Magenta Stork's-bill
Plantago gaudichaudii	Narrow Plantain
Ptilotus macrocephalus	Feather Heads
Ptilotus spathulatus	Pussy Tails
Tricoryne elatior	Yellow Rush-lily
Triptilodiscus pygmaeus	Common Sunray
Veronica gracilis	Slender Speedwell
Vittadinia gracilis	Woolly New Holland Daisy
Wahlenbergia capillaris s.s.	Tufted Bluebell
Wahlenbergia luteola	Bronze Bluebell

GRAMINOIDES

Botanical Name	Common name
Arthropodium minus	Small Vanilla-lily
Arthropodium strictum	Chocolate Lily
Rytidosperma carphoides	Short Wallaby-grass
Rytidosperma eriantha	Hill Wallaby-grass
Rytidosperma geniculata	Kneed Wallaby-grass
Rytidosperma laeve	Smooth Wallaby-grass
Rytidosperma penicillatum	Slender Wallaby-grass
Rytidosperma pilosum	Velvet Wallaby-grass
Rytidosperma racemosum	Stiped Wallaby-grass
Austrostipa bigeniculata	Kneed Spear-grass
Austrostipa mollis	Supple Spear-grass
Austrostipa scabra subsp. Falcata	Rough Spear-grass
Austrostipa semibarbata	Fibrous Spear-grass
Carex breviculmis	Common Grass-sedge
Carex inversa	Knob Sedge
Deyeuxia quadriseta	Reed Bent-grass
Dianella revoluta	Black-anther Flax-lily
Lomandra micrantha	Small-flower Mat-rush
Microlaena stipoides	Weeping Grass
Poa sieberiana var. sieberiana	Grey Tussock-grass
Schoenus apogon	Common Bog-sedge

SCRAMBLERS / CLIMBERS

Botanical Name	Common name
Cullen parvum	Small Scurf-pea
Desmodium varians	Slender Tick-trefoil
Glycine tabacina	Variable Glycine

GROWLING GRASS FROG HABITAT MANAGEMENT AND IMPROVEMENT PRINCIPLES AND ACTIONS

1. Maintain a buffer of at least 100 metres around Cowies Creek to protect GGF habitat.
2. Any revegetation of Cowies Creek bed, banks and adjacent riparian benches and terrestrial areas to be carried out in accordance with the Department of Energy, Environment and Climate Action's (DEECA) Growling Grass Frog Habitat Design Standards and the Growling Grass Frog Conservation Management Plan (GGFCMP) to encourage Growling Grass Frog foraging and dispersal.
3. Retain and strategically increase the size of existing key instream pools in accordance with the GGFCMP to enhance habitat opportunities for the Growling Grass Frog and other associated native species.
4. Assess hydraulic opportunities and constraints to install 6 GGF wetlands within the conservation area as recommended within the GGFCMP.
5. Develop and implement a strategic weed management program to control and manage high-threat weeds while protecting GGF habitat in accordance with the GGFCMP.
6. Provide areas of jumbled rock piles to waterway interfaces in accordance with DEECA's GGF Habitat Design Standards and the GGFCMP to provide areas of warmer water, basking sites and overwintering habitat.
8. Maintain open areas surrounding Cowies Creek and the proposed GGF wetlands to provide important dispersal corridors and foraging habitat. Ensure vegetation management to maintain low, grassy vegetation up to 10 centimeters high, with minimal tree and shrub cover.
9. Conduct ongoing population and habitat monitoring in accordance with the GGFCMP. Monitoring shall encompass water quality monitoring, aquatic and terrestrial vegetation monitoring, and GGF population monitoring.

GENERAL REVEGETATION PRINCIPLES

1. Typically all plant species shall be of local provenance collected from seed or cuttings from the local bio-region.
2. Plant selection and mix to be prepared in consultation with, Wadawurrung Traditional Owners Aboriginal Corporation (WTOAC), DEECA and the City of Greater Geelong.
3. Species selection and mix shall increase overall biodiversity of the site and habitat opportunities for the Growling Grass Frog and other native fauna to fulfil cultural and environmental objectives.
4. Tree species shall be placed in consideration of view lines, path locations and habitat requirements in accordance with the GGFCMP and the GGF Habitat Design Standards.
5. Any grades greater than 1:4 shall be vegetated for ease of maintenance and safety of maintenance operators.
6. Detailed planting design within the conservation reserve shall be guided by the recommendations of the GGFCMP, existing topography, aspect, patches of remnant vegetation and the requirements of the GGF Habitat Design Standards.
7. Planting and revegetation should occur primarily outside of the key active period for the Growling Grass Frog (GGF), which is between September and April. This is to minimize disturbance during critical lifecycle periods
8. Mulch shall not be used within 50m of the Cowies Creek banks
9. Where sedges and tussock forming grasses are used for revegetation within 10m of Cowies Creek banks ensure that planting density does not exceed 20 per cent cover when mature in accordance with the GGFCMP and the Growling Grass Frog Habitat Design Standard.
10. Tree planting to northern aspect of Cowies Creek shall be sensitively considered to prevent over shadowing of waterway areas. Tree cover within the designated Conservation Zone should not exceed 10 percent.
11. Shrub cover within the designated Conservation Zone should not exceed 10%.

INSTREAM AND WETLAND PLANT SPECIES

AQUATIC VEGETATION SPECIES LIST

Botanical Name	Common name
Alisma plantago-aquatica	Water Plantain
Bolboschoenus caldwellii	Salt Club-rush
Carex appressa	Tall Sedge
Carex tereticaulis	Basket Sedge
Crassula helmsii	Swamp Crassula
Cycnogeton procerum	Common Water-ribbons
Eleocharis acuta	Common Spike-sedge
Eleocharis sphacelata	Tall Spike-sedge
Juncus amabilis	Hollow Rush
Juncus flavidus	Golden Rush
Machaerina arthrophylla	Fine Twig-sedge
Machaerina articulata	Jointed Twig-sedge
Machaerina juncea	Bare Twig-sedge
Marsilea drummondii	Common Nardoo
Myriophyllum caput-medusae	Coarse Water-milfoil
Myriophyllum crispatum	Upright Water-milfoil
Myriophyllum satiugineum	Lake Water-milfoil
Myriophyllum simulans	Amphibious Water-milfoil
Myriophyllum verrucosum	Red Water-milfoil
Ornduffia reniformis	Running Marsh-flower
Ottelia ovalifolia subsp. Ovalifolia	Swamp Lily
Persicaria decipiens	Slender Knotweed
Potamogeton cheesemanii	Red Pondweed
Potamogeton crispus	Curly Pondweed
Potamogeton ochreatus	Blunt Pondweed
Ruppia megacarpa	Large-fruit Tassel
Ruppia polycarpa	Many-fruit Tassel
Stuckenia pectinata	Fennel Pondweed
Utricularia australis	Yellow Bladderwort
Vallisneria australis	Eel Grass

CREEKLINE GRASSY WOODLAND REVEGETATION PLANT LIST

TREES

Botanical Name	Common name
Eucalyptus camaldulensis	River Red-gum

UNDERSTOREY PLANTING

Botanical Name	Common name
Acacia melanoxylon	Blackwood
Acacia retinodes	Wirilda
Hymenanthera dentata s.l.	Tree Violet
Rubus parvifolius	Small-leaf Bramble
Enchylaena tomentosa var. tomentosa	Ruby Saltbush
Oxalis perennans	Grassland Wood-sorrel
Azolla filiculoides	Pacific Azolla
Lemna disperma	Common Duckweed
Austrostipa bigeniculata	Kneed Spear-grass
Poa labillardierei	Common Tussock-garss
Austrodanthonia racemosa var. racemosa	Stiped Wallaby-grass
Austrodanthonia caespitosa	Common Wallaby-grass
Microlaena stipoides var. stipoides	Weeping Grass
Glycine clandestina	Twining Glycine

3.5 INTEGRATED WATER MANAGEMENT

Integrated water management (IWM) will help create a network of enhanced and thriving natural environments and waterways that connect neighbourhoods and residents and provide access to nature.

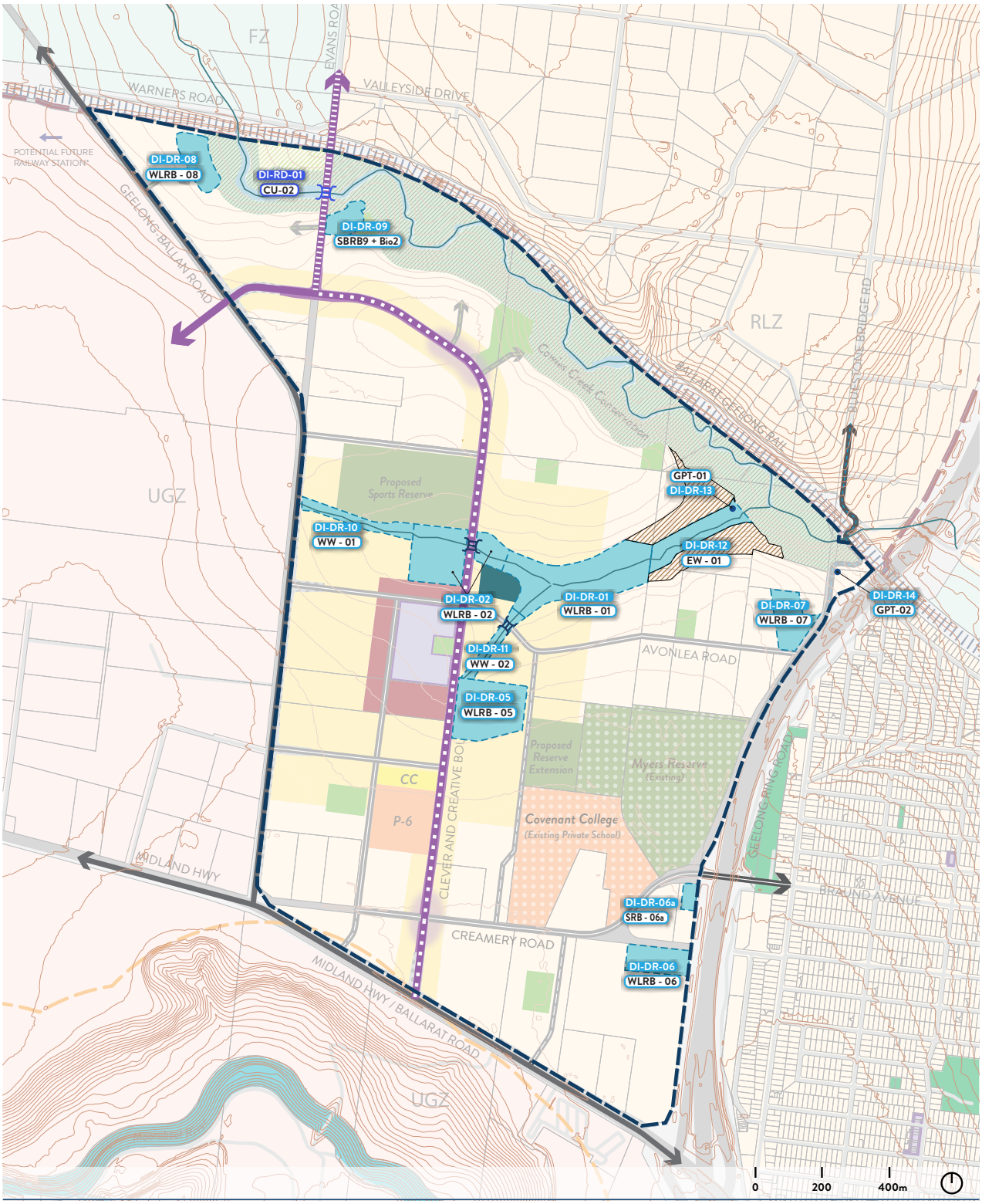
The City and water authorities will support and work collaboratively with development proponents to achieve best practice stormwater management and water sensitive urban design which delivers highly functional amenity places.

Blue-green infrastructure, including constructed waterways, will be delivered to create high quality streetscapes and other accessible open spaces. Cowies Creek will be protected from the adverse impacts of stormwater to ensure that its overlapping hydrological, geomorphological, ecological and cultural values are protected.

The PSP seeks to provide recycled water to all dwellings and passive irrigation of street trees and open spaces. Stormwater will be captured through detention and retarding basins and protect flows to Cowies Creek and local tributaries.

Both the natural ephemeral tributary to Cowies Creek and constructed waterways will convey treated stormwater to Cowies Creek and be restored to provide habitat for native flora and fauna.

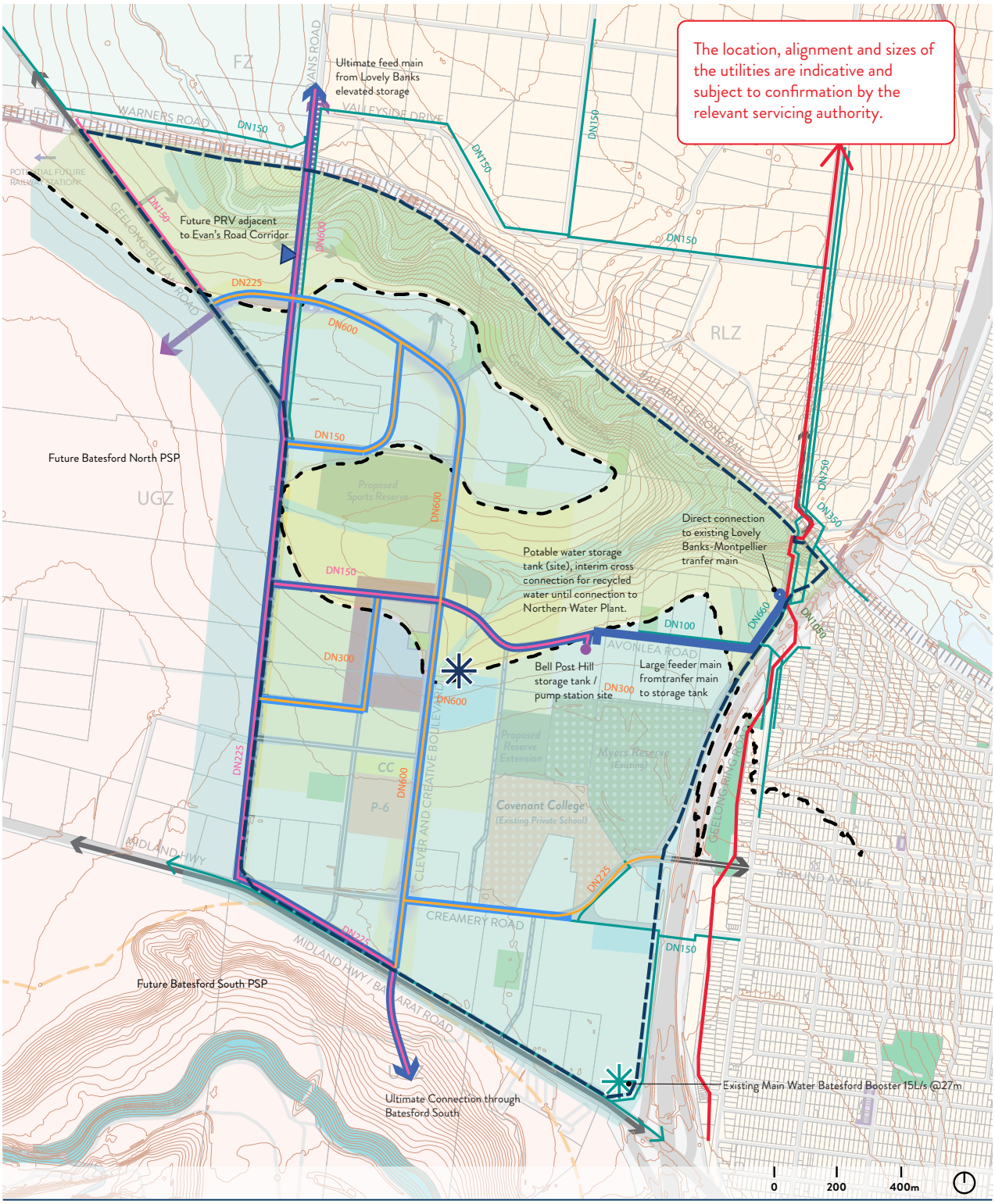
P18. INTEGRATED WATER MANAGEMENT



LEGEND

- Precinct Boundary
- Contours (2.5M)
- Existing Waterway
- Culvert
- Gross Pollutant Trap (GPT)
- Waterway & Drainage Asset
- Barwon Water Facility
- Investigation Area (Independent drainage solution to be investigated)
- Clever & Creative Corridor
- Clever & Creative Corridor (Evans Road Variation)
- Clever & Creative Boulevard
- A-A-00 Project Identification Number (Refer to Precinct Infrastructure List)
- AA-00 DCP Code

P19. POTABLE & RECYCLED WATER INFRASTRUCTURE



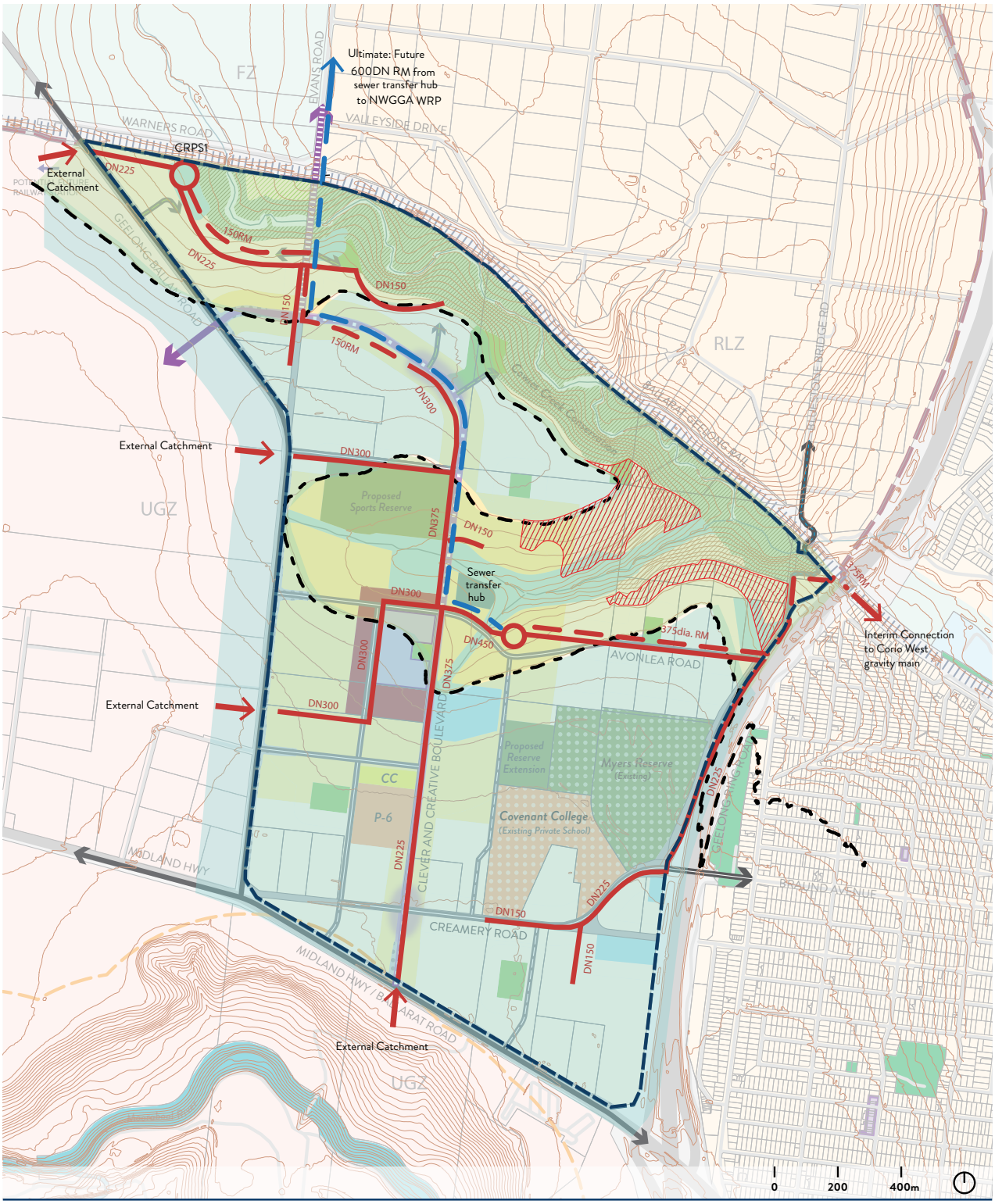
LEGEND

- Precinct Boundary
- Contours (2.5m)

PORTABLE & RECYCLED WATER

- Existing Water Mains
- Lovely Banks-Montpellier Transfer Main
- Proposed Key Water Mains
- Proposed Secondary Water Mains
- Proposed Key Recycled Water Mains
- Proposed Secondary Recycled Water
- 60m Contour
- Bell Post Hill Gravity Zone
- Bell Post Hill Pressure Boosted Zone

P20. SEWER INFRASTRUCTURE



LEGEND

- Precinct Boundary
- Contours (2.5m)

SEWER INFRASTRUCTURE

- Proposed Gravity Sewer
- Proposed Rising Main Sewer
- Ultimate Rising Main
- Additional Pumped Catchments (TBC)
- 60m Contour
- Bell Post Hill Gravity Zone
- Bell Post Hill Pressure Boosted Zone

3.5. INTEGRATED WATER MANAGEMENT

REQUIREMENTS

R55

Trunk infrastructure for potable water infrastructure, sewer and recycled water infrastructure must be placed along the general alignments illustrated on *Plan 19 Potable & Recycled Water Infrastructure* and *Plan 20 Sewer Infrastructure* or as otherwise agreed to by relevant authorities.

R56

All lots must be connected to:

- A safe and reliable potable water supply and sewerage services; and
- A reticulated recycled water system to provide for the supply of recycled water from a suitable scheme for toilet flushing, washing machine use and outdoor use including lawn and garden watering.

R57

Stormwater conveyance and treatment assets must be located generally in accordance with *Plan 18 Integrated Water Management* and designed generally in accordance with the Infrastructure Design Manual (IDM) and the Creamery Road Development Services Scheme (DSS), or subsequent drainage management plan, so as to comply with Clause 53.18 of the Planning Scheme, to the satisfaction of the responsible authority.

Where development staging does not provide for the delivery of ultimate infrastructure for stormwater conveyance and treatment, development proposals must demonstrate how any interim solution can adequately manage and treat stormwater and construction sediment prior to discharge from the development, how the interim solution responds in so far as reasonably practicable to EPA document 1739.1 (Urban Stormwater Management), and how the interim solution will not prejudice the delivery of the ultimate DSS asset, to the satisfaction of the responsible authority.

R58

The final layout and design of stormwater infrastructure, including but not limited to any DSS asset, and associated paths, boardwalks, bridges, and planting, must be designed to include appropriate measures to mitigate the risk of erosion, having regard to relevant guidance publications prepared by the EPA, including EPA publication 1739.1 (Urban Stormwater Management) to the satisfaction of the responsible authority.

R59

Alternative stormwater management responses to those presented in *Plan 18 Integrated Water Management* and the DSS must be to the satisfaction of the responsible authority and must demonstrate that:

- All applicable legislative and policy requirements are met;
- Any alternate stormwater management proposal responds to state targets for quantity and quality management outlined in EPA document 1739.1 (Urban Stormwater Management);
- Any alternate stormwater management proposal maintains the overall stormwater quality set by the DSS for the Creamery Road Precinct;
- The staging of development as outlined in the PSP is not negatively impacted; and
- Net community benefit is demonstrated whereby the overall stormwater management benefits outweigh the disbenefits.

Alternative stormwater management responses must:

- Be at least cost neutral without compromising satisfaction of legislative and policy requirements (including State targets for quantity and quality management of stormwater); and
- Integrate and connect with the public realm including activity centres, community infrastructure and the open space network, as practicable.

Alternative stormwater management responses must not be placed in any existing and/or proposed open space areas.

R60

The Stormwater Water Management Plan submitted as part of the application must:

- Demonstrate that stormwater flows and quality are maintained to pre-development levels in conservation areas as specified and anticipated in the DSS;
- Meet State and Federal requirements and approvals for altered flows to support the ecological values of the Cowies Creek catchment (including its existing tributaries, billabongs and ephemeral systems) and the design, location and placement of stormwater infrastructure must be generally in accordance with *Plan 18 Integrated Water Management* and the Strategic Assessment or any other approval under the EPBC Act;
- Demonstrate compliance with the staged delivery of ultimate drainage infrastructure generally in accordance with the DSS and include the provision, staging and timing of stormwater drainage infrastructure;
- Assess the existing surface and subsurface drainage conditions on the site;
- Nominate the location, type and surface area (m2) of proposed WSUD treatment systems, including how each internal sub-catchment area is to be treated and connected to a WSUD element, e.g. road surfaces to passively irrigate open space/street trees, and/or treated via tree pits, biofilters, wetlands;
- Include modelling of all stormwater assets and WSUD infrastructure, including a summary of model parameters used, justification where appropriate and results, as well as a copy of all MUSIC model files (*.sqz) with corresponding MUSIC Auditor reports showing compliance to water quality targets specified in the DSS for the Creamery Road Precinct;
- WSUD design and MUSIC Modelling parameters are to be generally consistent with the City of Greater Geelong Design Note 3; and
- Address how the application supports the outcomes of the *Northern and Western Geelong Growth Areas Integrated Water Management Plan (City of Greater Geelong, Barwon Water, 2021).*

R61

Water use efficiency must be optimised in the design of streets and open spaces through passive irrigation methods with the landscape (topography, natural overland flow paths) to ensure the long term viability of vegetation, to the satisfaction of the responsible authority.

R62

Street trees and canopy trees at street level must be passively irrigated through an appropriate WSUD solution:

- within open spaces and car parking areas; and
- where practicable, in all other areas of the precinct,

to the satisfaction of the responsible authority.

R63

The layout and design of waterways, wetlands and retarding basins (including the design of paths, bridges and boardwalks, and the stormwater drainage system) must integrate with biodiversity and natural systems to the satisfaction of relevant authorities.

R64

An application to develop and/or subdivide land within any areas identified as 'Investigation area (subject to stormwater and geotechnical assessment)' as shown on *Plan 18 Integrated Water Management*, or which is identified as untreated for drainage in the DSS must be accompanied with a drainage catchment and water quality treatment assessment as part of the stormwater strategy proposal that will achieve performance consistent with the DSS outcomes.

R65

The waterway corridor reserve for EW-01 and WW-01 (as shown on *Plan 18 Integrated Water Management*) must be ecologically rehabilitated, in accordance with local EVC characteristics with habitat features such as stags, rock or hollow logs and bushfire requirements for grassland classification.

3.5. INTEGRATED WATER MANAGEMENT

GUIDELINES

G55

Drainage and stormwater assets should be designed and incorporated into the overall street or path network as a visual feature and complement and build on the existing landscape features of the precinct to the satisfaction of the responsible authority.

G56

Where practical, and where primary waterway, open space and conservation functions are not adversely affected, IWM initiatives should be co-located with the precinct open space and recreation network.

G57

Sewer and recycled water infrastructure should be generally in accordance *Appendix 5 - Table 22 Service Placement Guidelines,* to the satisfaction of relevant authorities.

G58

Permeable pavements should be used for carparks and footpaths outside of the road reserve and, where practicable, within the road reserve.

T11. INTEGRATED WATER MANAGEMENT ASSET SUMMARY

ASSET ID	TYPE	RESPONSIBILITY	AREA (HA)
WLRB01 (DI_DR_01)	Sediment Basin with Wetland	City of Greater Geelong	5.469
WLRB02 (DI_DR_02)	Sediment Basin with Wetland	City of Greater Geelong	3.580
WLRB05 (DI_DR_05)	Sediment Basin with Wetland	City of Greater Geelong	3.371
WLRB06 (DI_DR_06)	Sediment Basin with Wetland	City of Greater Geelong	1.477
WLRB06a (DI_DR_06a)	Sediment Basin	City of Greater Geelong	0.340
SBRB07 (DI_DR_07)	Sediment Basin	City of Greater Geelong	1.603
WLRB08 (DI_DR_08)	Sediment Basin with Wetland	City of Greater Geelong	1.406
SBRB9 + Bio2 (DI_DR_09)	Sediment Basin with Bioretention System	City of Greater Geelong	0.871
WW01 (DI_DR_10)	Existing Waterway	City of Greater Geelong	1.172
WW02 (DI_DR_11)	Existing Waterway	City of Greater Geelong	0.908
EW01 (DI_DR_12)	Ephemeral Waterway	City of Greater Geelong	2.010
GPT-01 (DI_DR_13)	Gross Pollutant Trap 1	City of Greater Geelong	
GPT-02 (DI_DR_14)	Gross Pollutant Trap 2	City of Greater Geelong	

Note: For local untreated areas, the responsibility for stormwater treatment consistent with the drainage strategy sits with the developer and is subject to a stormwater management plan under Requirement 70 at the developer's cost.

3.6 CLIMATE RESILIENT COMMUNITIES

The PSP considers present and future risks presented by climate change and recognises the need to reduce exposure and vulnerability to climate related extreme weather events such as heatwaves, drought, bushfires and flooding.

The PSP includes a range of measures to embed community resilience and enable climate responsive outcomes.

3.6.1 Urban Greening 112

3.6.2 Bushfire Resilience 116

3.6.1 URBAN GREENING

The PSP seeks to achieve a minimum 30% canopy coverage across the precinct. This aim is supported by localised minimum canopy cover targets for various land uses, and will contribute to the achieving the canopy target set out in the Framework Plan and the City's Urban Forest Strategy.

3.6.1 URBAN GREENING

REQUIREMENTS

R66

Trees nominated to have critical and high retention value (as shown on *Plan 16 Biodiversity & Threatened Species*) must be retained within open spaces, road reservations or other public space with Tree Protection Zones applied in accordance with AS 4970-2009.

R67

Permit applications for development and/or subdivision must achieve the localised minimum canopy coverage stipulated by *Table 12 Canopy Coverage Requirement by Land Use* as part of the development's overall contribution to the 30 per cent canopy target for urban areas specified in Clause 12.06-1S (Urban forests).

R68

Street trees must be provided on both sides of all roads and streets (excluding laneways) at regular intervals appropriate to tree size at maturity and not exceeding the average intervals below unless otherwise approved by the responsible authority.

AVERAGE	TREE SIZE
8 – 10m	Small Trees (less than 10m canopy)
10 – 12m	Medium Trees (10m to 15m canopy)
12 – 15m	Large Trees (larger than 15m canopy)

R69

Street tree planting must use locally appropriate species and be consistent with any guidance provided on the relevant cross section within this PSP and *Appendix 6.1 – Table 23 Example Tree Species List* unless otherwise approved by the responsible authority.

R70

The location, placement and species of canopy trees must enable the bushfire vegetation classifications, to be achieved and maintained.

R71

Canopy trees provided in streets and public areas must:

- Be suitable for local conditions;
- Be planted into soil within all nature strips and road verges in accordance with Australian Standard AS4419- 2018 for Landscape Soils.
- Be planted in zones of modified and improved soil (such as structural soil), in accordance with Appendix 1 of Code of Practice, Management of Infrastructure in Road Reserves, Road Management Act 2004.
- Combine existing soil/bases to support tree establishment. The subsoil must be cultivated to the following depths:
  - A minimum depth of 400mm for small to medium sized trees.
  - A minimum depth of 800mm (or unless otherwise agreed by the responsible authority) for large trees.

Comprise a mix of native and exotic, flowering and nonflowering species, and incorporate fire wise tree species as determined by the *CFA guidelines Landscaping for Bushfire Garden Design and Plant Selection (June 2021)* or as amended, as appropriate.

T12. CANOPY COVERAGE REQUIREMENT BY LAND USE

LAND USE AS PER FUS	LOCALISED MINIMUM CANOPY COVERAGE*	SITE AREA THE CANOPY IS TO BE CALCULATED ACROSS
Drainage Corridors	10%	Centreline of abutting roads and/or parcel boundaries where appropriate
Drainage Reserves	10%	Site Boundary
Education Facilities (including Existing School)	25%	Centreline of abutting roads
Community Facility (Early Years & Community Hub)	20%	Centreline of abutting roads
Active (Sports) Reserve (including Existing Myers Reserve)	15%	Centreline of abutting roads
Community Parks	35%	Centreline of abutting roads
Activity Centre (NAC)	15%	Centreline of abutting roads
Residential (CRA, MUIDA, NAC IDA and IDA)	20%	Centreline of abutting roads
Car parking (non-residential)	25% + 15% understory planting	Extent Boundary

The following apply:

- Any trees which are retained by the proposal are counted towards the canopy coverage requirements.
- The diameter of a tree at maturity included in the calculation of tree canopy coverage in *Table 12 Canopy Coverage Requirement by Land Use* must be no less than 3m.
- Street trees existing or proposed within the site area are counted towards the land use based canopy cover requirement.
- Only trees contained within private land which serves as part of the public realm count towards the minimum canopy target by land use. Examples of such spaces are car parking areas, school grounds, public open spaces and land managed by body-corporate entities (or similar).

3.6.1 URBAN GREENING

GUIDELINES

G59

Tree species selection should be varied and based on the specimen's ability to easily establish and achieve their genetic potential in the local climate.

The use of fire wise tree species as determined by the *CFA guidelines Landscaping for Bushfire Garden Design and Plant Selection (June 2021)* or as amended, is encouraged.

G60

Tree species utilised on roads adjacent to the Cowies Creek Conservation Area should support and enhance the biodiversity values of the conservation area.

G61

Tree planting should maximise the shading of paved surfaces.

G62

Feature street trees should be selected where appropriate to serve as local landmarks and define key nodes, the activity centre, park frontages, and key intersections and entrances.

G63

Where practical, trees nominated to have moderate retention value should be retained within open spaces, road reservations or other public space with Tree Protection Zones applied in accordance with AS 4970- 2009.

3.6.2 BUSHFIRE RESILIENCE

The PSP will ensure that bushfire hazards are identified and that appropriate protection measures are implemented in the layout and design of the local street network, subdivisions and buildings and works.

REQUIREMENTS

R72

Vegetation within the Cowies Creek Conservation Area, waterway corridor and drainage assets must be managed in accordance with Clause 52.02-5, or at a standard which achieves a lower bushfire hazard classification in accordance with AS3959 2018 (or as amended) prior to the land being vested to the City.

R73

Vegetation located within any defendable space must be consistent with Table 4 to Clause 53.02 or otherwise agreed in writing by the responsible authority and relevant fire authority.

R74

Subdivision and development directly adjoining a bushfire hazard area must include a perimeter road or other appropriate treatment unless otherwise agreed by the responsible authority and relevant fire authority.

GUIDELINES

G64

Landscape design and plant selection in open spaces, including waterways and drainage corridors should not increase bushfire risk, to the satisfaction of the responsible authority and relevant fire authority.

G65

Subdivision design should include a network of streets that provide multiple evacuation routes away from Bushfire Hazard Areas into urban areas identified as low risk.

3.7 CIRCULAR ECONOMY

Waste minimisation, reuse and recycling will be implemented in the construction phases and development of new neighbourhoods to fulfil the City's strategic goal of zero waste to landfill.

The PSP seeks to mitigate waste by planning and managing construction processes to incentivise waste minimisation through material selection, reuse and resource recovery. The environmental impact associated with construction will be mitigated by encouraging the use of locally sourced materials with high recycled content and low embodied carbon.

The submission of a statement responding to circular economy provisions pursuant to the provisions of the Urban Growth Zone is a mandatory requirement though the inclusion of any commitments in that statement is voluntary.

GUIDELINES

G66

Development should consider circular economy principles, such as the use of, but not limited to:

- Existing built form or other infrastructure where reuse is feasible.
- Recycled content in:
  - Road construction materials, including road base and asphalt wearing course.
  - Concrete for footpaths, shared paths, cross overs, kerb and channel. – Drainage infrastructure including pipes (concrete and flexible) and drainage pits.
  - Street furniture.
- Locally sourced landscaping materials.
- Certified low volatile organic compound products.
- Timber that is certified by the Forest Stewardship Council or Program for the Endorsement of Forest Certification.

3.8 DELIVERY

The PSP will ensure the early delivery of key local and state infrastructure to support the development of liveable and well-connected communities.

3.8.1	Subdivision Works	123
3.8.2	Development Staging	125

CSIRO
NA

P21. PRECINCT INFRASTRUCTURE

LEGEND

- Precinct Boundary
- Early Years & Community Hub
- School
- Community Park
- Sports (Active) Reserve
- Waterway & Drainage Asset
- Land for Road Widening
- Recreational Transport Links
- Sports Pavillion
- Intersection
- Pedestrian Operated Signalised Crossing
- Bridge (Indicative)
- Gross Pollutant Trap (GPT)
- Culvert (Indicative)
- Waterway Crossing
- Emergency Hub (Indicative)
- AA-00 Project Identification Number (Refer to Precinct Infrastructure List)

3.8.1 SUBDIVISION WORKS

REQUIREMENTS

R75

Subdivision of land within the PSP must provide for all local infrastructure, other than that provided for within the Creamery Road DCP, including (but not limited to):

- Roads and streets including:
  - Connector roads and local streets.
  - Internal loop roads and service roads that abut arterial roads.
- Local bus stop infrastructure (where locations have been agreed in writing by Department of Transport and Planning).
- Landscaping of all existing and future roads and local streets.
- Intersection works and traffic management measures along arterial roads, connector streets, and local streets (except those included in the DCP).
- Fencing and landscaping, including along arterial roads, including, where required, any noise mitigation measures such as acoustic fences or barriers.
- Recreational transport links (shared pedestrian and bicycle paths) along local arterial roads, connector roads, streets and within local parks including bridges, intersections, and barrier crossings.
- Community parks.
- Bicycle parking facilities as required in this PSP.
- Basic improvements to local reserves and open space (refer to R86 below with regards to open space delivery).
- Local drainage system where required.
- Construction of culverts for waterway crossings of all connector streets and local streets.
- Local street or pedestrian path crossings of waterways and the electricity transmission line easement unless included in the DCP or outlined as the responsibility of another agency in the Precinct Infrastructure Plan.
- Infrastructure as required by utility service providers including water (potable and recycled water tapping for potential open space), stormwater, sewerage, drainage (except where the item is funded through a Development Services Scheme), electricity and telecommunications.

All to the satisfaction of the responsible authority.

R76

All encumbered and unencumbered public open space (where not provided via the Creamery Road DCP) must be designed and developed to a standard that satisfies the requirements of the responsible authority prior to the transfer or vesting of the public open space, including:

- Removal of all existing and disused structures, foundations, pipelines and stockpiles.
- Basic levelling and spread of minimum 100mm topsoil and subsoil if required on the proposed areas of open space to provide a stable free draining surface.
- Clearing of rubbish and environmental weeds and rocks, levelled, topsoiled and grassed with Warm climate grass (unless conservation reserve requirements dictate otherwise).
- Provision of water tapping, potable and/or recycled water connection points (where available).
- Provision of sewer and electricity connection points as required within the road reserve on the boundary of all proposed sports reserve and community parks.
- Canopy trees and other plantings.
- Soil preparation for new tree planting to a depth of 400-500mm.
- Construction of minimum 1.8m wide pedestrian paths outside the perimeter of the reserve, connecting and linking into any other surrounding paths or points of interest.
- Protection of trees that are to be retained including exclusion zones as appropriate.
- Vehicular exclusion devices (landscape treatments, fences, bollards or other suitable methods) and maintenance access points.
- Installation of park furniture and recreation infrastructure to support these facilities consistent with the type of public open space listed in *Appendix 3 - Table 19 Open Space Delivery Requirements.*

Mitigation of risks associated with landslide susceptibility in accordance with AGS 2007.

3.8.1 SUBDIVISION WORKS

R77

Sports (active) reserves as identified in *Table 13 Precinct Infrastructure* must be transferred to or vested in the relevant authority in the following conditions, including but not limited to:

- Free from surface and/or protruding rocks, structures and contaminated soil.
- Reasonably graded and/or top soiled to create a safe and regular surface with a maximum 1:6 gradient.
- Seeded and top-dressed with drought-resistant grass in bare, patchy and newly graded areas.

Provision of sewer, telecommunications, electricity, potable and recycled water (if available) connection points to reserve boundaries in consultation with the responsible authority.

R78

Any conservation area to be transferred to or vested in the relevant authority must be done so in a standard that satisfies the requirements of that authority. Works required prior to the transfer include, but may not be limited to:

- Site amelioration works, such as rubbish removal, demolition of existing structures, removal of old fence lines, foundations, pipelines, farm dams or stockpiles;
- Pest plant and animal eradication as appropriate;
- Repairs to and stabilisation of any existing structures to be retained onsite if appropriate; and
- Any fencing required to ensure the safety of the public.

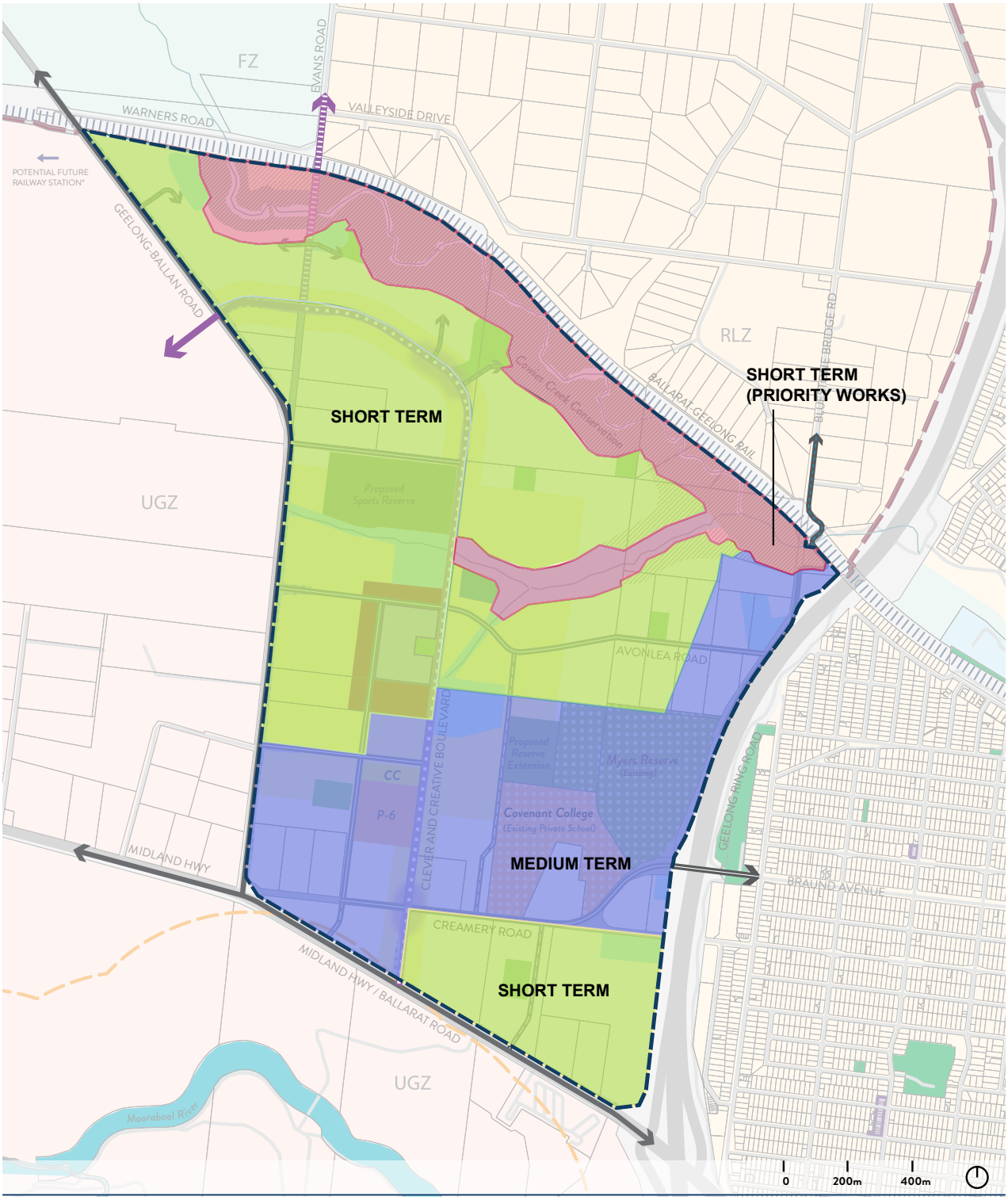
Any works carried out must be consistent with any relevant CHMP, the Cowies Creek Conservation Management Plan and other relevant approvals.

R79

All infrastructure including roads, utilities and drainage infrastructure located within the PSP must be designed to prevent the impacts of earthworks (including stockpiles) on the health and viability of vegetation retained as per the NVPP and be supported with appropriate plans that define and set appropriate protection zones throughout all subdivisional works.

3.8.2 DEVELOPMENT STAGING

P22. INDICATIVE PRECINCT STAGING



LEGEND

Precinct Boundary

STAGING PLAN

- Short Term (Priority Works)
- Short Term
- Medium Term

8.3.2 DEVELOPMENT STAGING

REQUIREMENTS

R80

Development staging must ensure that the CCC/CCB (when located in the planning permit area) is delivered within the earliest practicable stages of the development.

R81

- Subject to the provisions of R100, development staging of infrastructure must be generally in accordance with *Table 13 Precinct Infrastructure* to the satisfaction of the responsible authority.

R82

Subject to the provisions of R100, development and subdivision staging must provide for the delivery of:

- Drainage assets, including ultimate waterway and stormwater drainage infrastructure including stormwater retardation, treatment, harvest and use;
- Intersections of the CCC/CCB, connector streets and arterial roads;
- Connector streets, bridges/culverts and pedestrian culverts;
- Street links between properties, constructed to the property boundary;
- Recreational transport links and other path networks; and
- Community infrastructure, sports fields and other open spaces.

All to the satisfaction of the responsible authority.

R83

Where the development proponent seeks to proceed with delivery of an interim solution or asset, all the following criteria must be met as appropriate:

- The asset must not constrain nor prejudice the ultimate delivery of any other development or other infrastructure within the precinct nor constrain the sequencing and viability of other staging areas;
- It must not constrain nor prejudice the ultimate use of the land nor impact on the provision trigger for the use as defined in the PSP and DCP, on which the temporary asset is located;
- It must be demonstrated that the construction of the ultimate infrastructure is not practicable and the temporary infrastructure is required to service development;
- That part of the land on which the asset is located must be reinstated to a condition commensurate with the intended ultimate use of the land;
- The asset must be delivered through an agreement made under Section 173 of the Planning and Environment Act 1987, or another suitable measure as agreed to by Council, and the proposal must comply with the best practice requirements of the ultimate infrastructure;
- All costs of the temporary infrastructure must be fully funded by the proponent; and
- The asset must be contained to land owned by the proponent, or land subject to an evidenced agreement with the proponent, or the land on which the ultimate infrastructure is proposed and must not be located on land nominated for future public use such as community, education facilities, and open space, all to the satisfaction of the responsible authority. all to the satisfaction of the responsible authority.

This does not apply to the delivery of the CCC where the ultimate infrastructure must be provided.

R84

Development and subdivision staging, including the delivery of interim assets, must prioritise key road and servicing connections to adjoining properties to minimise fragmented development fronts and an over reliance on temporary servicing or circuitous road connections, to the satisfaction of the responsible authority.

R85

Infrastructure projects identified in *Plan 21 Precinct Infrastructure* must be delivered in accordance with the timing priority identified in the timing column of *Table 13 Precinct Infrastructure* unless supported by written confirmation from all relevant authorities and agencies to ensure that the development proposed does not compromise the delivery of the ultimate infrastructure required, nor the capacity for other developments.

R86

Community parks, sports (active) reserves, drainage corridors, waterway corridors and other public open spaces, including encumbered open spaces, must be delivered together with a stage containing residential lots, unless otherwise agreed by the responsible authority.

GUIDELINES

G67

Subdivision and/or development applications should demonstrate:

- How the proposal integrates with adjoining developments, through the timely provision of connecting roads and walking/cycling paths;
- How community parks will be provided in the early stages of the development;
- How sealed road access will be provided to each new allotment; and
- How any necessary trunk service extensions will be delivered, by the development proponent or the relevant authority, including confirmation of the agreed approach and timing by the relevant service provider.

G68

Development staging should ensure:

- Safe pedestrian links to activity centres, community facilities and school sites are included;
- Proximity to existing development or serviced land;
- Proximity to existing public transport and infrastructure;
- Proximity to existing or proposed community and education facilities; and
- Proximity to new or existing arterial or connector road infrastructure.

T13. PRECINCT INFRASTRUCTURE

TRANSPORT

PROJECT CATEGORY	PROJECT NO.	PROJECT NAME	PROJECT DESCRIPTION	LEAD AGENCY	DCP (YES/ NO)	DELIVERY TRIGGER/ TIMING	APPOR-TION-MENT
ROADS							
Land	LA_02	Geelong-Ballan Road Widening	LAND for Geelong-Ballan Road widening	Department of Transport and Planning	DI_RD_02_L	The first subdivision requiring the associated road section	50%
Land	LA_03	Midland Highway Widening	LAND for Midland Road widening	Department of Transport and Planning	DI_RD_03_L	The first subdivision requiring the associated road section	100%
Evans Rd.	ER_RD_02_04	Evans Road Upgrade	DELIVERY of Evans Road upgrade (northern section) – works between DI_IN_16 to future Anakie Road intersection	COGG	No	70% of dwellings in Creamery Road Precinct constructed	
Evans Rd.	ER_RD_02_03	Evans Road upgrade	DELIVERY of Evans Road upgrade (southern section) – works between DI_IN_16 to precinct boundary	COGG	No	70% of dwellings in Creamery Road Precinct constructed	
Shared Path	WW_01_SP	WW_01 Shared Path	DELIVERY of shared path along WW_01 reserve	COGG	DI_TR_01	Upon completion of WW_01 (DI_DR_10) works	
Shared Path	WW_02_SP	WW_02 Shared Path	DELIVERY of shared path along northern boundary of WLRB_01	COGG	DI_TR_02	Upon completion of WLRB_01 (DI_DR_01) works	
Shared Path	Nil	Recreational Transport Link - Land & Works	Recreational Transport Link network throughout Creamery Road Precinct (unless defined as a separate DCP project)	Developer	No	Upon subdivision	
Road	Nil	Clever & Creative Boulevard - Land & Works		Developer	No	Upon subdivision	
Road	Nil	Connector Road (Suburban, Modified Urban, Modified Connector) - Land & Works		Developer	No	Upon subdivision	

PROJECT CATEGORY	PROJECT NO.	PROJECT NAME	PROJECT DESCRIPTION	LEAD AGENCY	DCP (YES/ NO)	DELIVERY TRIGGER/ TIMING	APPOR-TION-MENT
Road	Nil	Connector intersections - Land & Works		Developer	No	Upon subdivision	
Road	Nil	Local Access Street (Level 1 & 2) - Land & Works		Developer	No	Upon subdivision	
Road	Nil	Pedestrian Street (Narrow & Wide) - Land & Works		Developer	No	Upon subdivision	
Road	Nil	Micro Street - Land & Works		Developer	No	Upon subdivision	
Road	Nil	Laneway - Land & Works		Developer	No	Upon subdivision	
Road	Nil	Parking Street - Land & Works		Developer	No	Upon subdivision	
Road	Nil	Conservation Interface Street - Land & Works		Developer	No	Upon subdivision	

T13. PRECINCT INFRASTRUCTURE

TRANSPORT

PROJECT CATEGORY	PROJECT NO.	PROJECT NAME	PROJECT DESCRIPTION	LEAD AGENCY	DCP (YES/ NO)	DELIVERY TRIGGER/ TIMING	APPOR-TION-MENT
INTERSECTIONS							
CCC Intersection	IN_01	CCC/Geelong-Ballan Rd Intersection	Intersection: Geelong - Ballan Road and North -South CCC	COGG	DI_IN_01	The first subdivision requiring the intersection delivery	50%
CCC Intersection	IN_12	CCC/Evans Rd Intersections - Works	DELIVERY of intersection: CCC and Evans Road - SIGNALS ONLY	COGG	DI_IN_12	The first subdivision requiring the intersection delivery	100%
Evans Road Upgrade Intersection	ER_IN_16	Evans Road/ Lovely Banks Road Intersection	DELIVERY of Evans Road/Lovely Banks Road Intersection - Signalised through intersection - 4 leg intersection	COGG	No	When RD_04 and RD_05 are required	
Intersection	IN_03	External Intersection - Works (interim)	DELIVERY of intersection: Geelong - Ballan Road and East-West Connector Road	COGG	DI_IN_03	The first subdivision requiring the intersection delivery	50%
Intersection	IN_04	External Intersection - Works (interim)	DELIVERY of intersection: Geelong - Ballan Road and East-West Connector Road	COGG	DI_IN_04	The first subdivision requiring the intersection delivery	50%
Intersection	IN_05	External Intersection - Works (interim)	Land and works for arterial signalised 'T' intersection: - Midland Hwy & Geelong -Ballan Road	COGG	DI_IN_05 DI_IN_05_L	Indicatively 50% of lots in Creamery Road Precinct constructed	50%
Intersection	IN_06	External Intersection - Works (interim)	DELIVERY of intersection: North-South CCB and Midland Hwy	COGG	DI_IN_06	The first subdivision requiring the intersection delivery	100%
Intersection	IN_07	Internal Intersection - Works	DELIVERY of intersection: North-South CCB and Key Local Road - SIGNALS ONLY	COGG	DI_IN_07	The first subdivision requiring the intersection delivery	100%

PROJECT CATEGORY	PROJECT NO.	PROJECT NAME	PROJECT DESCRIPTION	LEAD AGENCY	DCP (YES/ NO)	DELIVERY TRIGGER/ TIMING	APPOR-TION-MENT
Intersection	IN_09	Internal Intersection - Works	DELIVERY of intersection: North-South CCB and Connector Road - SIGNALS ONLY	COGG	DI_IN_09	The first subdivision requiring the intersection delivery	100%
PEDESTRIAN CROSSINGS							
Pedestrian crossing	POS_01	Pedestrian Operated Signalised crossing on Evans Road	Delivery of a pedestrian crossing located between IN_12 and CU_02.	Developer	No	Once construction of IN_12 is complete	
BRIDGES							
Bridge	BR_01	Batesford South PSP bridge (arterial road - Lynnburn Road over Moorabool River)	Land and works for interim bridge for arterial road extension of Lynnburn Road over Moorabool River	COGG	DI_BR_01	To be determined when Batesford South PSP is developed.	11.96%
Bridge	BR_02	Bluestone Bridge Road underpass	Bluestone Bridge Road underpass upgrade and shared path connection -install traffic signals to allow one way movements and shared path (recreational transport link) connection	COGG	DI_BR_02	Concurrent to the completion of conservation works in the Cowies Creek Worneenanyook Masterplan Area delineated by properties 14 and 22 in the Creamery Road Place Based Plan.	29.56%
Bridge	BR_04	Creamery Road Pedestrian Bridge over Geelong Ring Road	Land and works for active travel upgrade to existing Bridge on Creamery Road over the Geelong Ring Road	COGG	DI_BR_04	30% of dwellings in Creamery Road Precinct constructed.	100%

T13. PRECINCT INFRASTRUCTURE

DRAINAGE

PROJECT CATEGORY	PROJECT NO.	PROJECT NAME	PROJECT DESCRIPTION	LEAD AGENCY	DCP (YES/ NO)	DELIVERY TRIGGER/ TIMING	APPOR-TION-MENT
WETLAND & SEDIMENT BASINS							
Wetland & Retarding Basin	WLRB_01	Wetland & Retarding Basin 1	Land and works for drainage asset - 5.469 Ha (TBC final area)	COGG	DI_DR_01 DI_DR_01_L	Short term Outfall into DI_DR_12 and Conservation are which must be completed first.	100%
Wetland & Retarding Basin	WLRB_02	Wetland & Retarding Basin 2	Land and works for drainage asset - 3.580 Ha (TBC final area)	COGG	DI_DR_02 DI_DR_02_L	Short term Must be functioning before contributing sub-catchments and upstream catchment can develop and after DI_DR_01 is functioning.	100%
Wetland & Retarding Basin	WLRB_05	Wetland & Retarding Basin 5	Land and works for drainage asset - 3.371 Ha (TBC final area)	COGG	DI_DR_05 DI_DR_05_L	Short term Must be functioning before contributing sub-catchments can develop and after DI_DR_01 and DI_DR_11 is functioning.	100%
Wetland & Retarding Basin	WLRB_06	Wetland & Retarding Basin 6	Land and works for drainage asset - 1.477 Ha (TBC final area)	COGG	DI_DR_06 DI_DR_06_L	Short term Must be functioning before contributing sub-catchments can develop and after outfall is functioning.	100%
Sediment Basin	SRB_06a	Sediment Basin 6a	Land and works for drainage asset - 0.340 Ha (TBC final area)	COGG	DI_DR_06a DI_ DR_06a_L	Short term Must be functioning before contributing sub-catchments can develop and after outfall is functioning.	100%
Sediment Basin	WLRB_07	Sediment Basin 7	Land and works for drainage asset - 1.603 Ha (TBC final area)	COGG	DI_DR_07 DI_DR_07_L	Short term Must be functioning before contributing sub-catchments can develop and after outfall to Cowies Creek through Conservation area is functioning.	100%
Wetland & Retarding Basin	WLRB_08	Wetland & Retarding Basin 8 - Works	Works for drainage asset - 1.406 Ha (TBC final area)	COGG	DI_DR_08	Short term Must be provided before the contributing sub-catchment can develop and after Conservation zone works and outfall to Cowies Creek is established.	100%
Sediment Basin & Bioretention System	SRB_09 -Bio_02	Sediment Basin & Bioreten-tion System 2 (Bio2) -Works	Land and works for sediment basin, bioretention basin and Growling Grass Frog Pond. - 0.871 Ha (TBC final area)	COGG	DI_DR_09 DI_DR_09_L	Short term Must be provided before the contributing sub-catchment can develop and after Conservation zone works and outfall to Cowies Creek is established.	100%

PROJECT CATEGORY	PROJECT NO.	PROJECT NAME	PROJECT DESCRIPTION	LEAD AGENCY	DCP (YES/ NO)	DELIVERY TRIGGER/ TIMING	APPOR-TION-MENT
WATERWAY CORRIDOR WORKS							
Waterway	WW_01	Waterway 1 - Works	Land and works for Waterway No.1 (1.172 Ha – TBC final area) The alignment of this corridor should follow the natural overland flow path and provide abundant revegetation and landscaping wherever possible. A recreational transport link (shared path) will also be co-located in the reserve.	COGG	DI_DR_10	Short term Must be provided with DI_DR_02 sub-catchments and before upstream catchment can develop.	100%
Waterway	WW_02	Waterway 2 - Works	Land and works for Waterway No.2 (0.908 Ha – TBC final area) The alignment of this corridor should follow the natural overland flow path of the land and provide abundant revegetation and landscaping wherever possible. A recreational transport link (shared path) will also be co- located in the reserve where allowable.	COGG	DI_DR_11	Short term Must be provided before DI_DR_05 sub-catchment can develop and after DI_DR_01 is functioning.	100%
Waterway	EW_ 01	Ephemeral (Natural) Waterway - Works	Land and works for Ephemeral Waterway. (2.010 Ha – TBC final area) EW_01 is downstream of the confluence of both WW_01 and WW_02 and enters Cowies Creek. The alignment of this corridor should follow the natural overland flow path of the land provide abundant re- vegetation and landscaping wherever possible. A recreational transport link (shared path) will also be co -located in the reserve where allowable.	COGG	DI_DR_12	Short term Must be provided before upstream catchment can develop and after Conservation zone works and outfall to Cowies Creek is established.	100%
Waterway	CR_01	Waterway Crossing Works	Land and Bridge/Culvert Works for the recreational transport link over EW_01	Developer	No	Required on completion of EW_01 upgrade works	
Waterway	CR_02	Waterway Crossing Works	Land and Bridge/Culvert Works for the recreational transport link over WW_01	Developer	No	Required on completion of WW_01 works	

T13. PRECINCT INFRASTRUCTURE

DRAINAGE

PROJECT CATEGORY	PROJECT NO.	PROJECT NAME	PROJECT DESCRIPTION	LEAD AGENCY	DCP (YES/ NO)	DELIVERY TRIGGER/ TIMING	APPOR-TION-MENT
CULVERTS							
Culvert	CU_01	Culvert works	DELIVERY of Culvert - Ephemeral waters to flow under North South Collector Road	COGG	No		
Culvert	CU_02	Culvert works	DELIVERY of Culvert & Roadworks - Cowies Creek under Evans Road	COGG	DI_RD_01	Concurrent with the construction of Evans Road	100%
Culvert	CU_03	Culvert works	DELIVERY of Culvert - Ephemeral waters to flow under Avonlea Rd	COGG	No		
STORMWATER FILTERING SYSTEMS							
Gross Pollutant Trap	GPT_01	Gross Pollutant Trap 1 - Works	Works for drainage asset (TBC final area)	COGG	DI_DR_13	Long term Water quality objectives meet through delivery of all other WLRBs in Precinct.	100%
Gross Pollutant Trap	GPT_02	Gross Pollutant Trap 2 - Works	Works for drainage asset (TBC final area)	COGG	DI_DR_14	Long term Water quality objectives meet through delivery of all other WLRBs in Precinct.	100%

T13. PRECINCT INFRASTRUCTURE

OPEN SPACE

PROJECT CATEGORY	PROJECT NO.	PROJECT NAME	PROJECT DESCRIPTION	LEAD AGENCY	DCP (YES/ NO)	DELIVERY TRIGGER/ TIMING	APPOR-TION-MENT
COMMUNITY PARKS							
Community Park	CP01	Local Community Park 1	Land & works for CP01 - 0. 5 Ha The local park is located at the intersection of Evans Road and the conservation interface street at the north-western section of the PSP adjacent to Cowies Creek boundary.	COGG	No	Upon subdivision	
Community Park	CP02	Local Community Park 2	Land & works for CP02 - 1.973 Ha This local park is located adjacent to the Coolangatta Homestead. It will provide passive recreation opportunities and strong views in most directions.	COGG	No	Upon subdivision	
Community Park	CP03	Local Community Park 3	Land & works for CP03 - 0.5 Ha This local park is located to the northern east corner, adjacent to the Cowies Creek Conservation area boundary.	COGG	No	Upon subdivision	
Community Park	CP04	Local Community Park 4	Land & works for CP04 –0.5 Ha This local park is located north of the drainage corridor, on Property 13.	COGG	No	Upon subdivision	
Community Park	CP05	Local Community Park 5	Land & works for CP05 –0.5 Ha This local park is located in close proximity to the drainage corridor north of Avonlea Road.	COGG	No	Upon subdivision	
Town Square	CP06	Town Square	Land & works for CP06 - 0.296 Ha This local town square park is located within the NAC Precinct, on the southern side of the Pedestrian Street and adjoining the CCC to the east.	COGG	No	Upon subdivision	
Community Park	CP07	Local Community Park 7	Land & works for CP07 - 1.0 Ha It is located opposite the proposed government primary school surrounded by residential areas, and connected to the precinct's recreational transport network.	COGG	No	Upon subdivision	
Community Park	CP08	Local Community Park 8	Land & works for CP08 - 1.0 Ha This local park forms the focal point of this precinct.	COGG	No	Upon subdivision	

PROJECT CATEGORY	PROJECT NO.	PROJECT NAME	PROJECT DESCRIPTION	LEAD AGENCY	DCP (YES/ NO)	DELIVERY TRIGGER/ TIMING	APPOR-TION-MENT
SPORTS (ACTIVE) RESERVES							
Sports Reserve	SR_01	Myers Reserve Extension	Land & works for Myers Reserve Extension – 3.25 Ha	COGG	DI_OS_01 DI_ OS_01_L	Prior to 40% of dwellings delivered in Creamery Road Precinct, or as required according to demand levels and subject to DCP funding	70%
Sports Reserve	SR_02	Northern Sports Reserve	Land & works for the Northern Sports Reserve - 8.641 Ha	COGG	DI_OS_02 DI_ OS_02_L	Prior to 60% of dwellings delivered in Creamery Road Precinct, or as required according to demand levels and subject to DCP funding	100%
OTHER							
Pavillion	SRP_01	Creamery Road Pavilion	Works for the pavilion located within the Northern Sports Reserve	COGG	CI_OS_01	Concurrent to works for SR_02 (DI_OS_01) Northern Sports Reserve	100%

T13. PRECINCT INFRASTRUCTURE

COMMUNITY FACILITIES & EDUCATION

PROJECT CATEGORY	PROJECT NO.	PROJECT NAME	PROJECT DESCRIPTION	LEAD AGENCY	DCP (YES/NO)	DELIVERY TRIGGER/TIMING	APPOR-TION-MENT
EDUCATION							
Education	PS_01	Primary School 1	Proposed Government School located in the south of the precinct	Department of Education	No	Subject to State Government provision planning	
COMMUNITY FACILITIES							
Community Facility	CF_01	Early Years & Community Hub	Land & works for the Early Years & Community Hub (1 Ha) is formed by a consolidated Multipurpose Community Centre and Early Learning Centre, located above PS_01 (a proposed government primary school)	COGG	DI_CF_01	Prior to 20% of development build out within precinct	100%
OTHER							
Community Facility	CF_ML_01	McCanns Lane Cultural Hub	Land & works for McCanns Lane Cultural Hub including library and museum	COGG	CI_CF_ML_01	Prior to 80% of dwellings delivered in Western Geelong Growth Area, or as required according to demand levels and subject to DCP funding	10.74%
Emergency Hub	CF_03	Western Growth Area Emergency Hub	One emergency hub incorporating ambulance, fire and state emergency services	State Government	No	Subject to State Government provision planning	
Police	CF_ML_03	Police & Justice Centre	One police station collocated with a justice centre	Department of Justice	No	District level facility serving WGGA	

4.0

APPENDICES

A1.	Property Specific Land Budget	142
A2.	Complete Streets	144
A3.	Open Space Delivery Requirements	164
A4.	Activity Centres	166
A5.	Service Placement Guidelines	170
A6.	Canopy Cover	171

A1. PROPERTY SPECIFIC LAND BUDGET

T14. PROPERTY SPECIFIC LAND BUDGET

Underlined figures may be subject to change

PROPERTY DETAILS		TOTAL AREA	TRANSPORT				COMMUNITY & EDUCATION			UNCREDITED OPEN SPACE						CREDITED OPEN SPACE		NDA							TOTAL NDA	PUBLIC LAND EQUALISATION METHOD UNDERS & OVER CALCULATION				
Address	Prop No	Total Area	Existing Road Being Retained*	Intersec-tion Extent	Intersec-tion Extent (DCP Land)*	Road Widening (DCP Land)	Existing Non-Govern-ment School	Proposed Early Years Hub (DCP Land)	Proposed Govern-ment School	Barwon Water Facilities	Cowies Creek Conser-vation Reserve	Drainage*	Drainage (DCP Land)*	Existing AOS (Myers Reserve)	Waterway	Active Open Space (DCP Land)	Local Open Space	NAC	Mixed Use Zone	Residential Growth Zone	Residential Growth Zone & Amenity Area	General Residential Zone*	General Residential Zone & Amenity Awrea	Investigation Area (Subject to Stormwater & Geotechnical Assessment)	Total NDA	Valuers 'Before Area'	DCP Residential Contri-bution (All)	Average Under Area	Under Provision	Over Provision
200 Ballan Road, MOORABOOL VIC 3213	1	24.481		0.990		0.583					6.787		1.406								2.368	11.635	0.711		14.714	14.166	0.583	1.832	0.583	-
35 Evans Road, MOORABOOL VIC 3213	2	1.535		0.215		0.004																1.316			1.316	1.320	0.004	0.178	0.004	-
35 Evans Road, MOORABOOL VIC 3213	3	0.543		0.001		0.140																0.402			0.402	0.542	0.140	0.054	0.054	0.086
Existing Road Reserve	4	1.702	1.702																						0.000	-	-	-	-	-
20 Evans Road, BELL POST HILL VIC 3215	5	37.626									11.796	0.400	0.471				1.290				6.521	14.474	2.674		23.669	24.140	0.471	3.193	0.471	-
10 Evans Road, BELL POST HILL VIC 3215	6	2.435																				2.435			2.435	2.435	-	0.328	-	-
2 Evans Road, BELL POST HILL VIC 3215	7	2.892				0.038																2.344	0.510		2.854	2.892	0.038	0.385	0.038	-
20 Evans Road, BELL POST HILL VIC 3215	8	22.670									12.167						1.690				1.116	6.505	1.192		8.813	8.813	-	1.189	-	-
PARENT - 30 Avonlea Road, BELL POST HILL VIC 3215	9	2.039									1.811											0.189		0.039	0.228	0.241	-	0.033	-	-
PARENT - 30 Avonlea Road, BELL POST HILL VIC 3215	10	2.061									1.829											0.092		0.140	0.232	0.236	-	0.032	-	-
PARENT - 30 Avonlea Road, BELL POST HILL VIC 3215	11	0.594									0.594														0.000	-	-	-	-	-
100 Ballan Road, BELL POST HILL VIC 3215	12	36.968		0.966		0.318						0.554	3.395			8.641	0.300	3.976	3.258	0.440	13.411	0.627	1.085		22.797	33.976	11.182	3.075	3.075	8.107
60 Avonlea Road, BELL POST HILL VIC 3215	13	37.989								1.000		2.522	4.384		0.811		0.499			2.186	15.638	7.237	3.429	0.281	28.771	33.559	4.288	3.949	3.949	0.339
PARENT - 30 Avonlea Road, BELL POST HILL VIC 3215	14	13.088									4.964	1.973										1.922		4.228	6.150	5.915	-	0.798	-	-
165 Bluestone Bridge Road, BELL POST HILL VIC 3215	15	0.040									0.040														0.000	-	-	-	-	-
50 Avonlea Road, BELL POST HILL VIC 3215	16	2.027											0.037									0.826	0.897	0.267	1.990	1.990	-	0.268	-	-
40 Avonlea Road, BELL POST HILL VIC 3215	17	2.025															0.500					0.689	0.835		1.524	1.025	-	0.138	-	-
PARENT - 30 Avonlea Road, BELL POST HILL VIC 3215	18	2.025																				1.446	0.579		2.025	2.025	-	0.273	-	-
85-105 Bluestone Bridge Road, BELL POST HILL VIC 3215	19	2.098									0.011											2.087			2.087	2.087	0.328	0.237	0.237	0.091
20 Avonlea Road, BELL POST HILL VIC 3215	20	2.035											0.420									1.034	0.581		1.615	2.035	0.600	0.194	0.194	0.406
65-75 Bluestone Bridge Road, BELL POST HILL VIC 3215	21	1.606											1.183									0.423			0.423	1.606	1.211	0.053	0.053	1.158
	22	0.657									0.368											0.289			0.289	0.289	-	0.039	-	-
90-140 Bluestone Bridge Road, BELL POST HILL VIC 3215	23	0.541																				0.541			0.541	0.541	-	0.073	-	-
45 Avonlea Road, BELL POST HILL VIC 3215	24	2.025																				0.956	1.069		2.025	2.025	-	0.273	-	-
35 Avonlea Road, BELL POST HILL VIC 3215	25	2.025																				0.957	1.068		2.025	2.025	-	0.273	-	-
25 Avonlea Road, BELL POST HILL VIC 3215	26	2.025																				0.958	1.067		2.025	2.025	-	0.273	-	-
15 Avonlea Road, BELL POST HILL VIC 3215	27	1.810																				0.91	0.900		1.810	1.810	-	0.244	-	-
5 Avonlea Road, BELL POST HILL VIC 3215	28	0.300																				0.07	0.230		0.300	0.300	-	0.040	-	-
60 Ballan Road, BELL POST HILL VIC 3215	29	5.281		0.137		0.007												0.024	2.538		2.551	0.022			5.135	5.144	0.007	0.693	0.007	-
445 Ross Road, BATESFORD VIC 3213	30	23.719		0.848	0.008	0.014		1.000	3.500								1.000			1.155	10.705	4.468	1.021		17.349	18.444	1.095	2.340	1.095	-
65 Creamery Road, BELL POST HILL VIC 3215	31	18.048											2.833			3.250				0.704	7.214	3.541	0.506		11.965	18.048	6.083	1.614	1.614	4.469
125 Creamery Road, BELL POST HILL VIC 3215	32	3.790												3.790											0.000	-	-	-	-	-
125 Creamery Road, BELL POST HILL VIC 3215	33	0.366												0.366											0.000	-	-	-	-	-
125 Creamery Road, BELL POST HILL VIC 3215	34	13.305	0.145											13.160											0.000	-	-	-	-	-
5 Creamery Road, BELL POST HILL VIC 3215	35	2.127		0.005	0.260																	1.862			1.862	2.127	0.265	0.251	0.251	0.014
15 Creamery Road, BELL POST HILL VIC 3215	36	1.825																				1.825			1.825	1.825	-	0.246	-	-
25 Creamery Road, BELL POST HILL VIC 3215	37	2.025																				2.025			2.025	2.025	-	0.273	-	-
55 Creamery Road, BELL POST HILL VIC 3215	38	2.429																			0.781	1.12	0.528		2.429	2.429	-	0.328	-	-
105 Creamery Road, BELL POST HILL VIC 3215	39	11.611					11.611																		0.000	-	-	-	-	-
85 Creamery Road, BELL POST HILL VIC 3215	40	3.197																				2.255	0.942		3.197	3.197	-	0.431	-	-
110 Creamery Road, BELL POST HILL VIC 3215	41	1.864																				0.567	1.298		1.865	1.864	-	0.251	-	-
120 Creamery Road, BELL POST HILL VIC 3215	42	1.000											0.340									0.443	0.217		0.660	1.000	-	0.135	-	-
375 Ballarat Road, BATESFORD VIC 3213	43	12.337		0.629		0.254															2.020	8.295	1.139		11.454	11.708	0.254	1.545	0.254	-
375 Ballarat Road, BATESFORD VIC 3213	44	7.023				0.140											1.000					2.069	3.814		5.883	6.023	0.140	0.794	0.140	-
305 Ballarat Road, BATESFORD VIC 3213	45	13.078				0.082						0.400	1.077									9.513	2.006		11.519	12.678	1.508	1.507	1.507	0.001
341-345 Ballarat Road, BATESFORD VIC 3213	46	2.024				0.083																1.941			1.941	2.024	0.083	0.262	0.083	-
335-339 Ballarat Road, BATESFORD VIC 3213	47	2.024				0.078																1.946			1.946	2.024	0.078	0.263	0.078	-
Existing Road Reserve	48	6.791	6.791																						0.000	-	-	-	-	-
Existing Road Reserve	49	2.840	2.607								0.234														0.000	-	-	-	-	-
GRAND TOTAL		**344.566**	**11.245**	**3.791**	**0.268**	**1.741**	**11.611**	**1.000**	**3.500**	**1.000**	**40.601**	**5.848**	**15.546**	**17.316**	**0.811**	**11.891**	**6.279**	**4.000**	**5.796**	**4.485**	**62.325**	**102.256**	**28.298**	**4.955**	**212.115**	**238.578**	**28.358**	**28.359**	**13.687**	**14.671**

A2. COMPLETE STREETS
A2.1 STREET TYPE & ATTRIBUTES

T15. STREET TYPES & ATTRIBUTES

The table below provides guidance on how the different street types can be used to develop a network of streets and roads.

STREET TYPE	LANEWAY (8M)	MICRO STREET (10M)	PEDESTRIAN STREET (10M & 16M)	PARKING STREET (16M)	LOCAL ACCESS 1 (16M)	LOCAL ACCESS 2 (20M)	CONNECTOR (MODIFIED URBAN)	CONNECTOR (SUBURBAN) (25M)	CONNECTOR (URBAN) (25M)	CLEVER & CREATIVE CORRIDOR (34M) & CLEVER AND CREATIVE BOULEVARD (28M)	EVANS ROAD (CLEVER & CREATIVE CORRIDOR) (20M)	CONSERVATION INTERFACE STREET (20M)
PURPOSE	To provide car access to enable car-free frontage streets, providing streets for people.	To provide an inviting shared environment where private vehicles are permitted as guests.	To provide streets for people which also serve as a public 'backyard' space.	To provide a safe and amenable street environment that can accommodate on-street parking at the periphery of Micro Street and Pedestrian Street clusters.	To provide the option for residential neighbourhood streets that prioritise private vehicles.	To provide the option for residential neighbourhood streets that accommodate local bus services, noting no dedicated cycling infrastructure.	To provide a primary connection for people and goods through the centre of Activity Centre that creates a main street experience with very high place quality.	To connect neighbourhoods and link local streets to the Clever and Creative Corridor and the external arterial road network through residential areas. To provide safe and direct places to walk, ride, drive between neighbourhoods and local centres.	To provide streets that serve as a destination and a place to stay and dwell. To support an urban environment which seeks to provide non-residential ground floor uses and accommodate on street parking. The street type seeks to provide connections between focal points in local neighbourhoods.	To provide a dedicated public and active transport corridor which promotes the use of sustainable transport as the most direct route connecting activity centres.	To provide the principal connection for the local movement of people, vehicles and goods between the Northern and Western Geelong Growth Areas.	To provide an amenable interface to conservation areas that provides access to walking and cycling routes for transport and recreation.
APPLICATION	Micro streets Pedestrian streets.	In conjunction with laneways, pedestrian streets and generally all local streets.	In conjunction with laneways, pedestrian streets and generally all local streets providing highly permeable places for people.	On the perimeter of walkable clusters comprised of Micro Streets and Pedestrian Streets (ideally within 5min walking distance / 400m).	For all local street areas.	For local Streets with bus services.	To provide connections to, and provide a focal point for Activity Centres. The street is a key community destination and place to meet, stay and dwell.	Connections between neighbourhoods and major local destinations on corridors with bus services and traffic volumes of up to 7,000 vehicles per day.	Main street connections through local activity centres with bus services and traffic volumes of up to 10,000 vehicles per day.	As nominated in the Plan 5 Future Urban Structure and Plan 11 Street Network.	As nominated in the Plan 5 Future Urban Structure and Plan 11 Street Network.	Streets adjoining a conservation area.
DOES THIS STREET SUPPORT CROSSOVERS?	Yes	Limited	No	Yes	Yes	Yes	No	Yes	No	No	Yes	Yes
NOTIONAL VEHICLE TRAFFIC VOLUME	< 300 vpd (per Cl 56.06-8)	< 1,000 vpd (per Cl 56.06-8)	N/A	1,000 - 2,000 vpd (per Cl 56.06-8)	1,000 -2,000 vpd (per Cl 56.06-8)	2,000-3,000 vpd (per Cl 56.06-8)	3,000-10,000 vpd	3,000 - 7,000 vpd (per Cl 56.06-8)	3,000 -10,000 vpd	15,000 vpd Maximum	Up to 20,000 vpd	2,000 - 3,000 vpd (per Cl 56.06-8)
BUS CAPABLE	No	No	No	No	No	Yes	No	Yes	Yes	Yes	Yes	Yes

T16. INTERSECTION REQUIREMENTS

	ARTERIAL	CCC	CONNECTORS	OTHER
Unsignalized intersections	N/A	Wombat crossings at all legs of intersections with local access streets.	At intersections with roundabouts, wombat crossings at all legs. At other intersections, wombat crossings across minor street only.	Wombat crossings at all legs of intersections with roundabouts.
Midblock	N/A	Wombat crossings at entry points to all key destinations (e.g., schools, community facilities, activity centre, local parks).		Wombat crossings at entry points to key destinations to the satisfaction of the Responsible Authority.

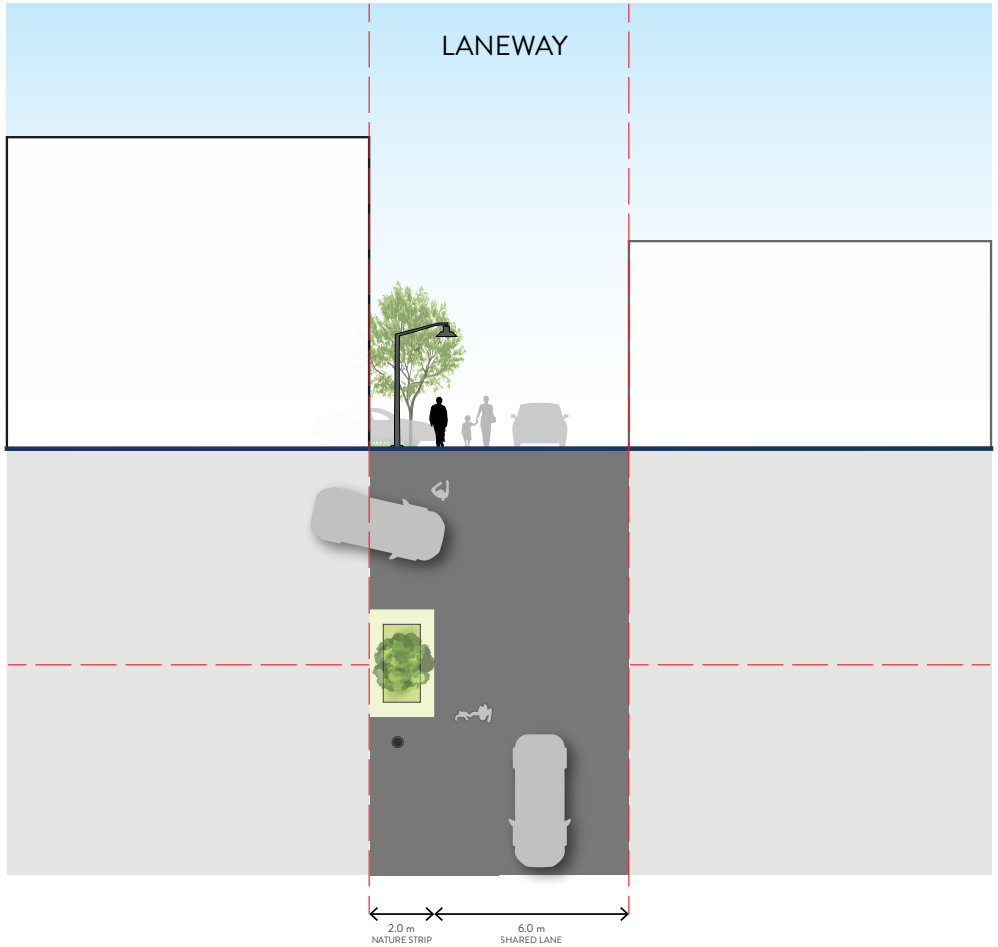
T17. COMPLETE STREETS GENERAL REQUIREMENTS

GENERAL	
1	Intersections should be designed with compact geometry to improve pedestrian safety and legibility generally in accordance with intersections within the *Appendix 2.3 Street Intersections.* Infrequent large vehicles (including emergency vehicles, delivery trucks, rubbish collection vehicles) will be expected to make turns by using multiple lanes, including adjacent or opposing lanes.
2	Slip lanes must not be provided on local streets or in areas of high pedestrian activity such as the NAC Precinct, along the CCC or CCB, connector streets and abutting community uses.
3	Speed bumps must be used to enforce slow speeds (e.g. 10 km/h). Wombat crossings on minor roads to an intersection must use the following ramp gradients to enforce slow speeds: • Ramp gradients on bus-capable roads, must be as steep as practical to achieve slow speeds. • Surfaces on shared streets must comply with the Disability Discrimination Act, and include other measures used to ensure low vehicle speeds are enforced. • Ramp gradients approaching wombat crossings must be between 1:20 and 1:16.
4	Vision impaired guidance, including tactile ground surface indicators must be applied: • To achieve best practice to denote hazards such as street crossings, provide wayfinding, and guide pedestrians to the kerb. • Ground surface indicators should be of a contrasting colour to ensure contrast and maximise visibility.
CLEVER AND CREATIVE CORRIDOR (CCC) & CLEVER AND CREATIVE BOULEVARD (CCB)	
5	Controlled intersections and crossings (signalised or wombat crossings) must be provided at frequent intervals between key destinations to ensure safe navigation.
6	At all unsignalized intersections on the CCC and CCB and areas that experience pedestrian activity such as adjacent to the NAC, schools and open space areas, wombat crossings must be used on both sides to provide pedestrian and cyclist priority.
7	Motor vehicles will only be permitted to travel across the CCC and CCB at signalised intersections. Other intersections are left-in, left-out for motor vehicles but permit pedestrians and cyclists to cross the CCC and CCB.

T18. TRANSIT & TRANSIT STOP DESIGN REQUIREMENTS

TRANSIT DESIGN REQUIREMENT	ALONG CCC & CCB	ALONG OTHER BUS ROUTES
Bus stops to be provided between cycling lanes and bus route to the satisfaction of DoT or relevant authority	Bus stops are provided in the CCC or CCB median to the satisfaction of DoT.	Where cycling lanes are provided (i.e., connector roads), the bus stop is to be between these lanes and the traffic lane to the satisfaction of DoT Pedestrian priority crossing the cycling lane must be provided.
Signage and/or line marking to be provided on approach to bus stops for cyclists	Signage to be provided at pedestrian and cyclist crossing points of the transit lanes to remind these users to give way to buses.	Signage and line marking to be provided on approach to bus stops to remind cyclists and drivers to slow down.
Bus stops must form part of the trafficable lane (not indented)	N/A	
All-weather shelters, bins, seating, electronic service information and landscaping to be provided at stops	Yes	

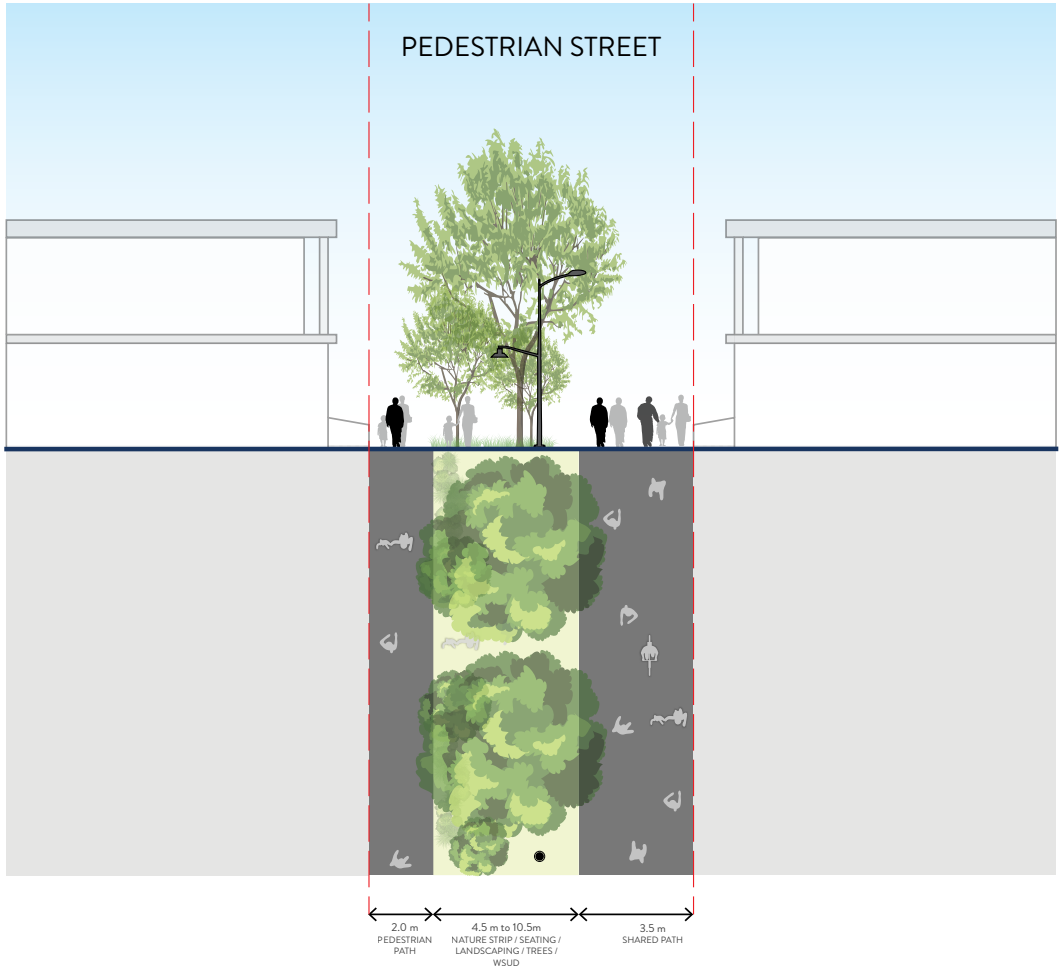
A2.2 STREET TYPES & CROSS SECTIONS



Cross-Section 1	8.0m

Refer to Servicing Placement Guidelines for direction on utility servicing provision

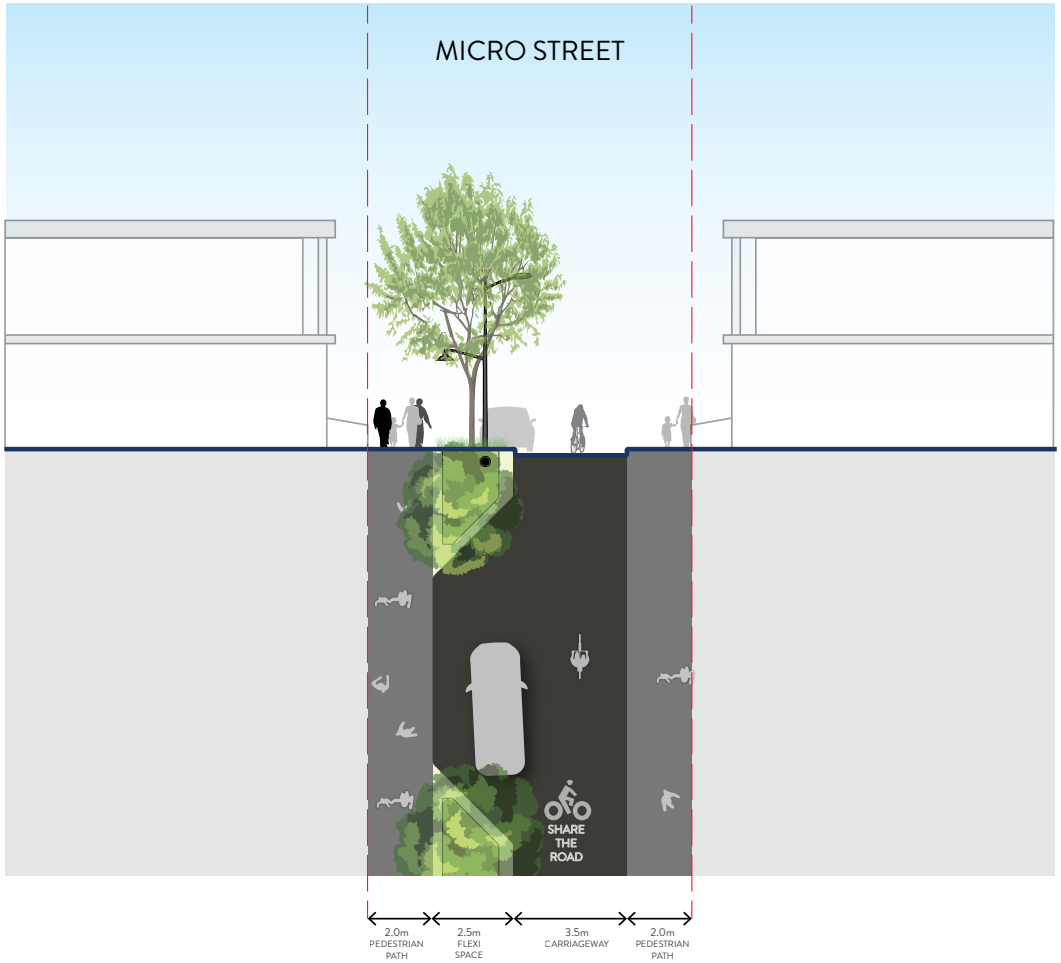
A2.2 STREET TYPES & CROSS SECTIONS



Cross-Section 2	10.0m

Refer to Servicing Placement Guidelines for direction on utility servicing provision

A2.2 STREET TYPES & CROSS SECTIONS



Cross-Section 3	10.0m

Refer to Servicing Placement Guidelines for direction on utility servicing provision

A2.2 STREET TYPES & CROSS SECTIONS

Cross-Section 5	16.0m

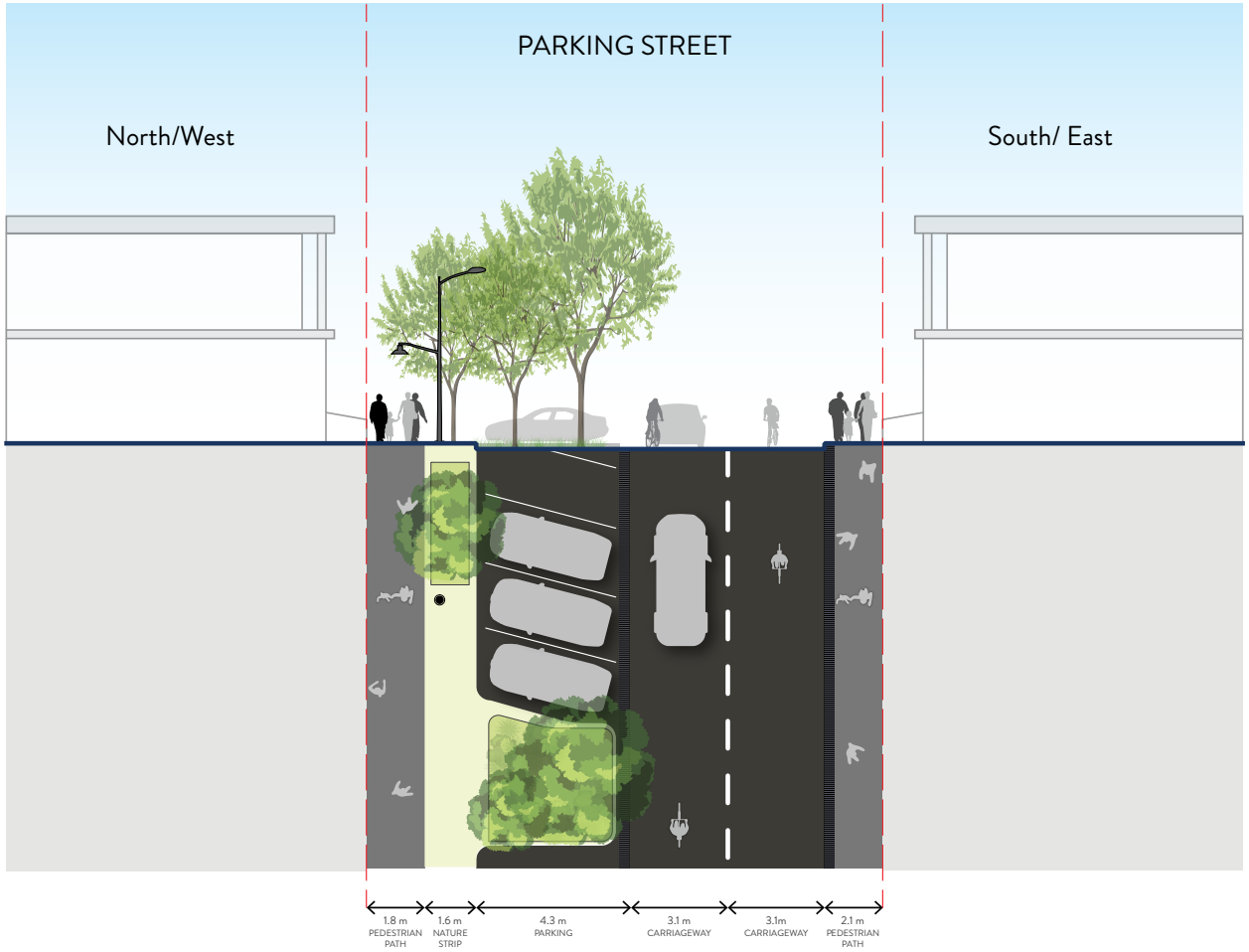
Refer to Servicing Placement Guidelines for direction on utility servicing provision

A2.2 STREET TYPES & CROSS SECTIONS

Cross-Section 6	20.0m

Refer to Servicing Placement Guidelines for direction on utility servicing provision

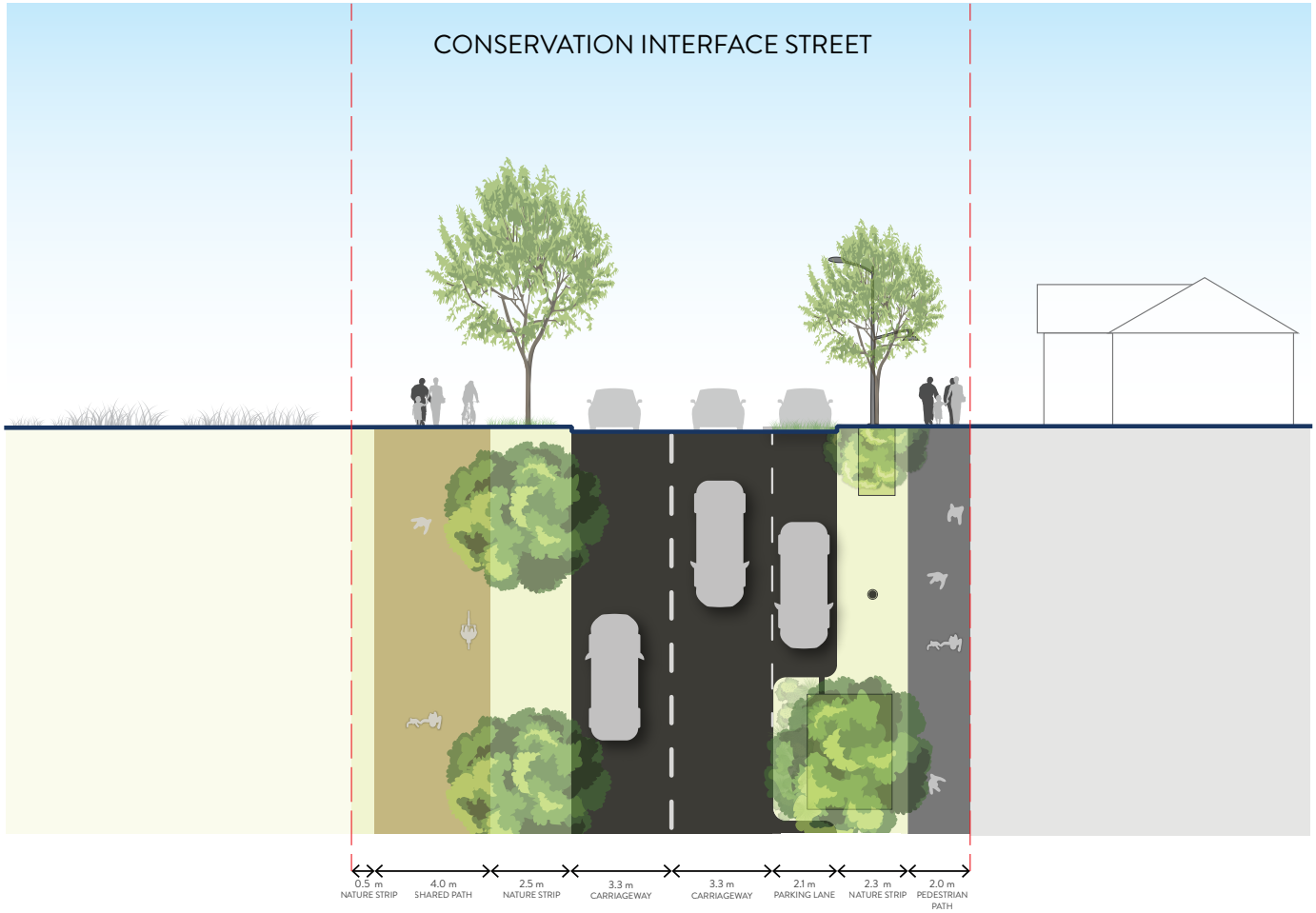
A2.2 STREET TYPES & CROSS SECTIONS



Cross-Section 7	16.0m

Refer to Servicing Placement Guidelines for direction on utility servicing provision

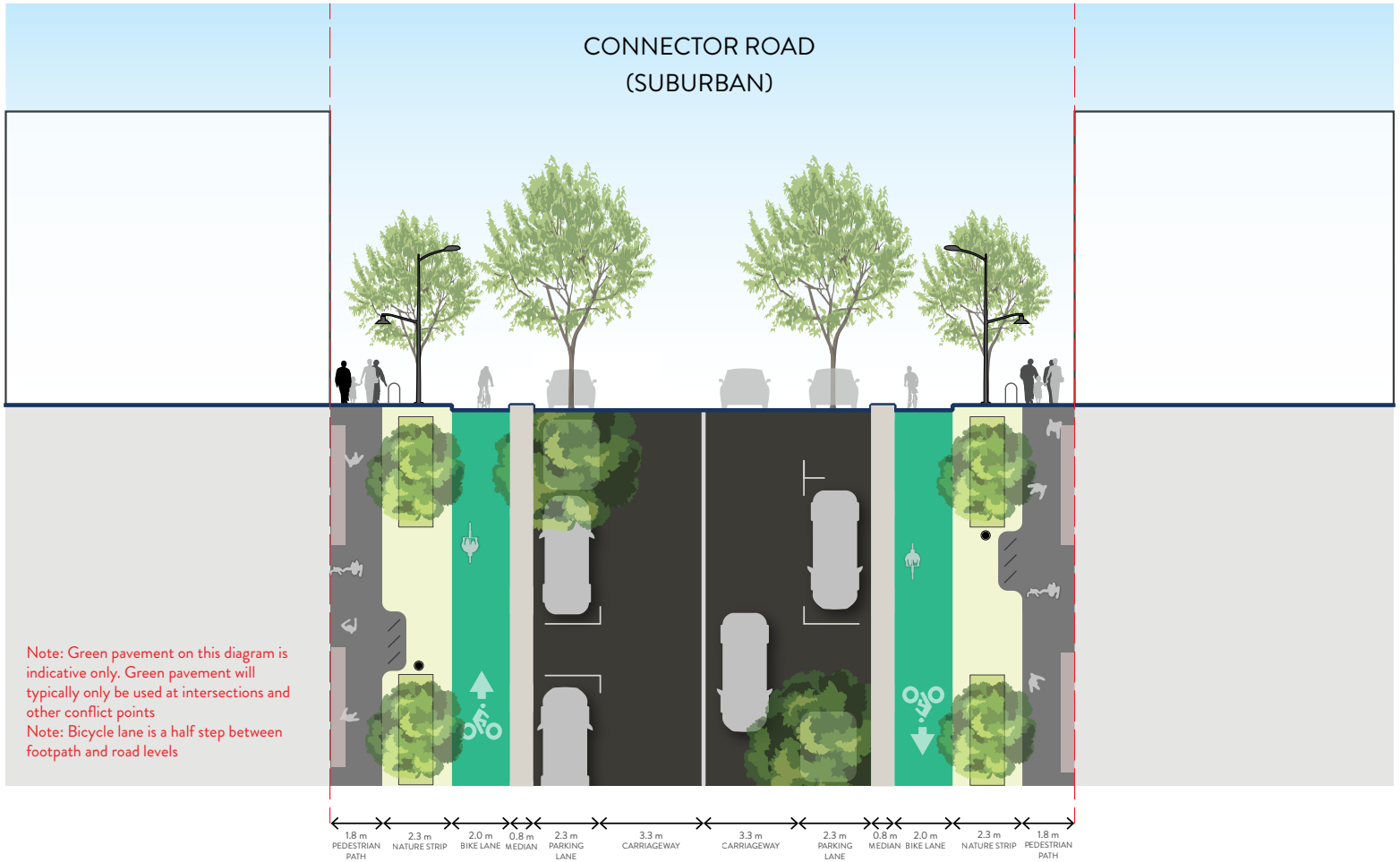
A2.2 STREET TYPES & CROSS SECTIONS



Cross-Section 8	20.0m

Refer to Servicing Placement Guidelines for direction on utility servicing provision

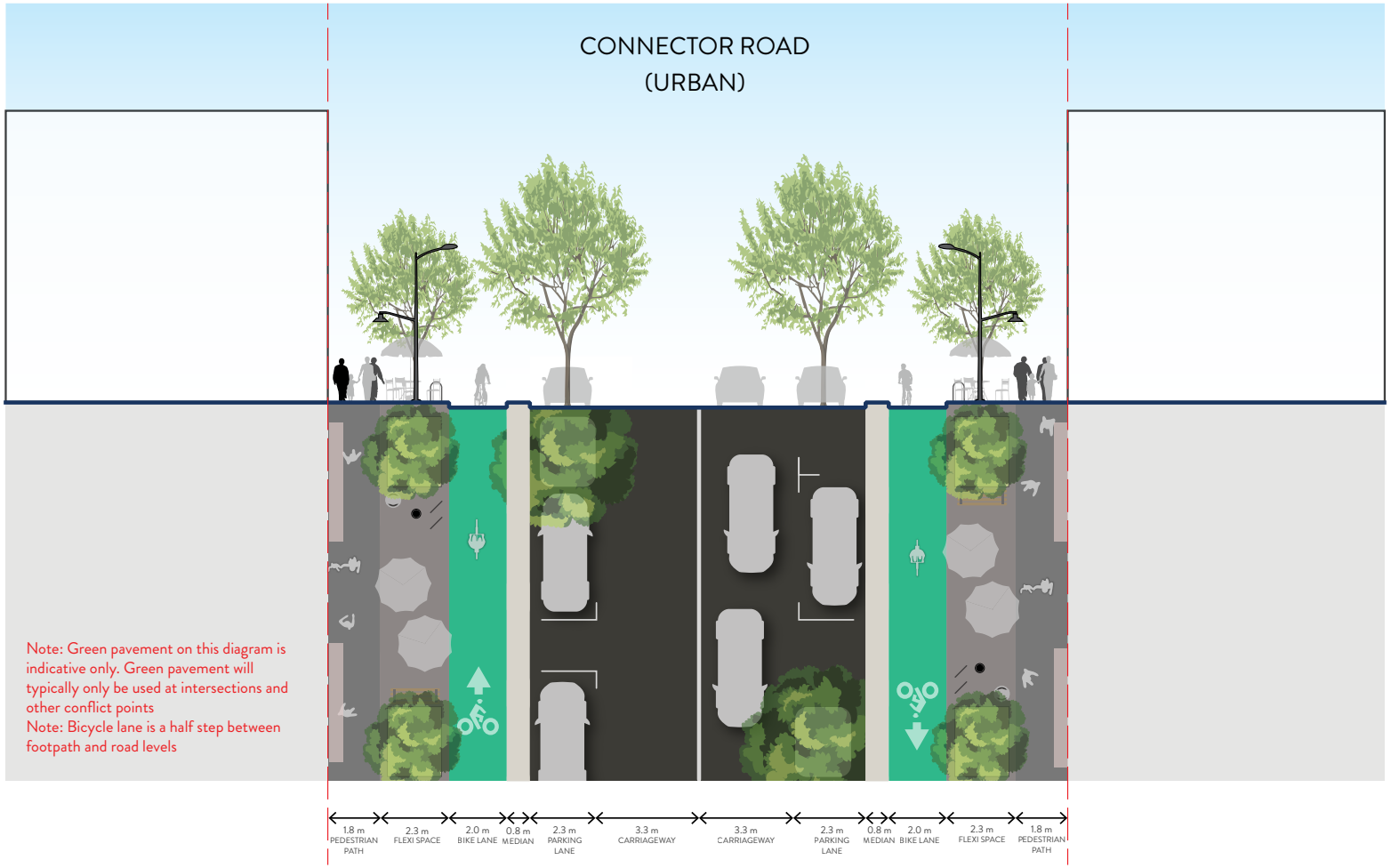
A2.2 STREET TYPES & CROSS SECTIONS



Cross-Section 9	25.0m

Refer to Servicing Placement Guidelines for direction on utility servicing provision

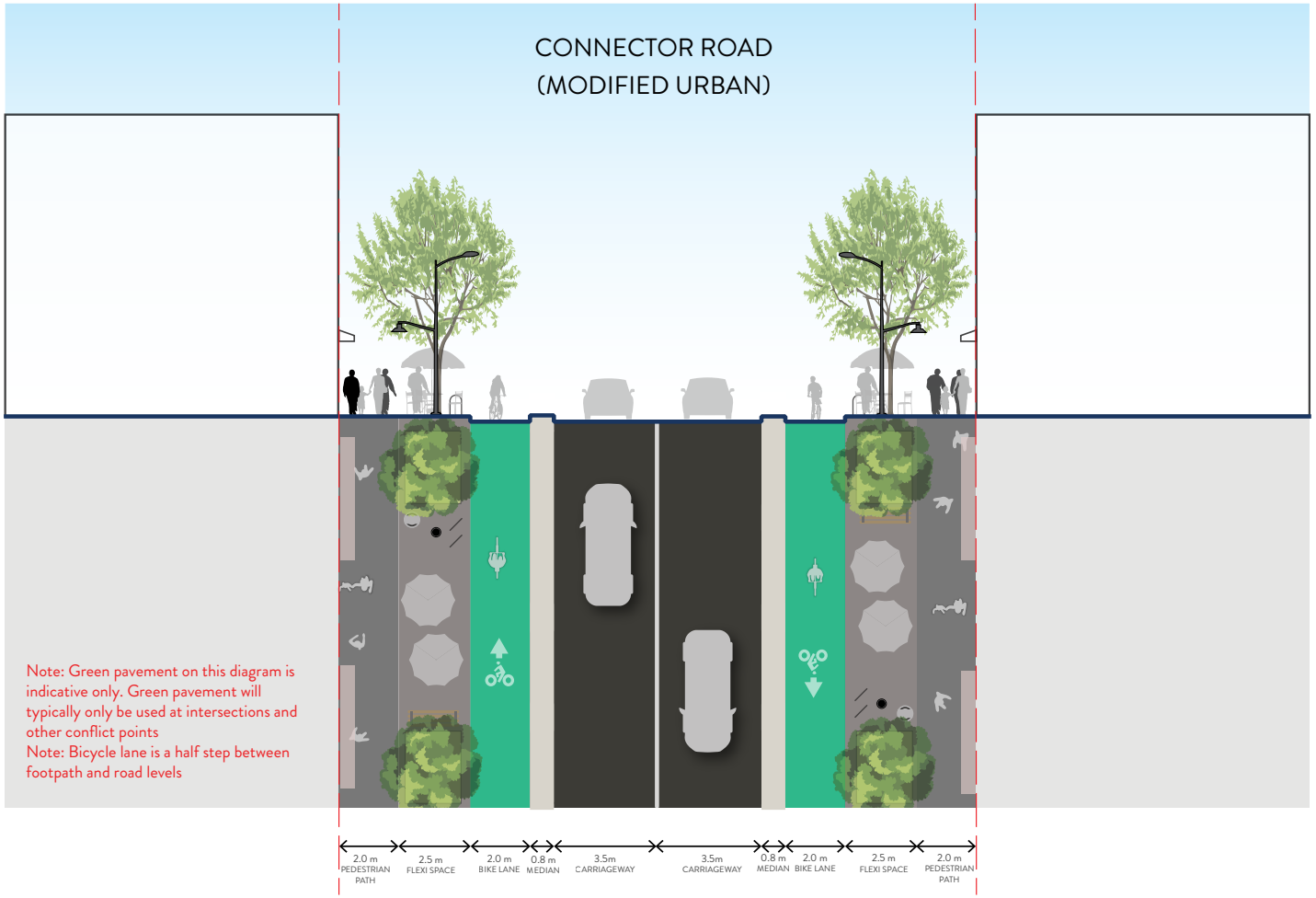
A2.2 STREET TYPES & CROSS SECTIONS



Cross-Section 10	25.0m

Refer to Servicing Placement Guidelines for direction on utility servicing provision

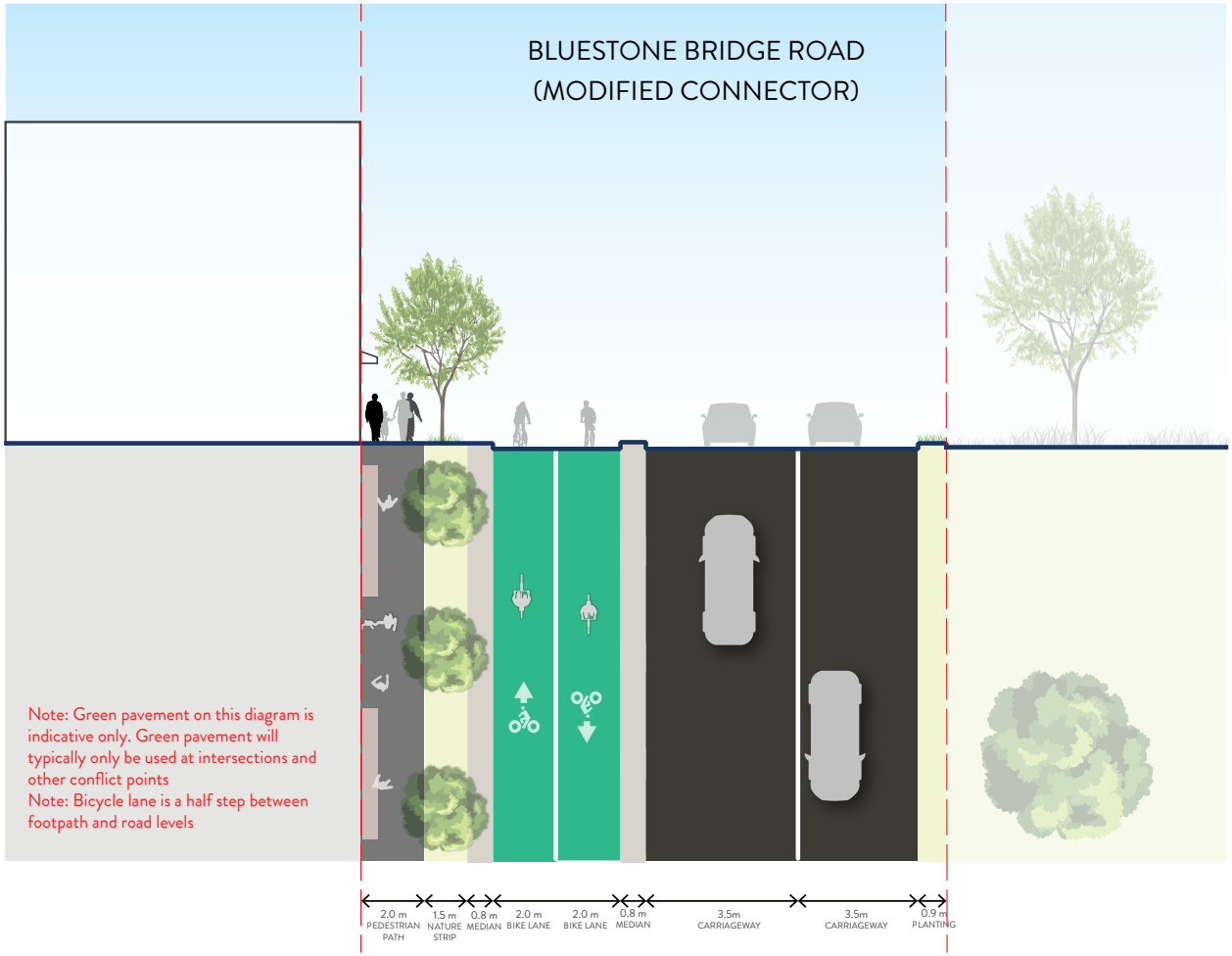
A2.2 STREET TYPES & CROSS SECTIONS



Cross-Section 11	21.6m

Refer to Servicing Placement Guidelines for direction on utility servicing provision

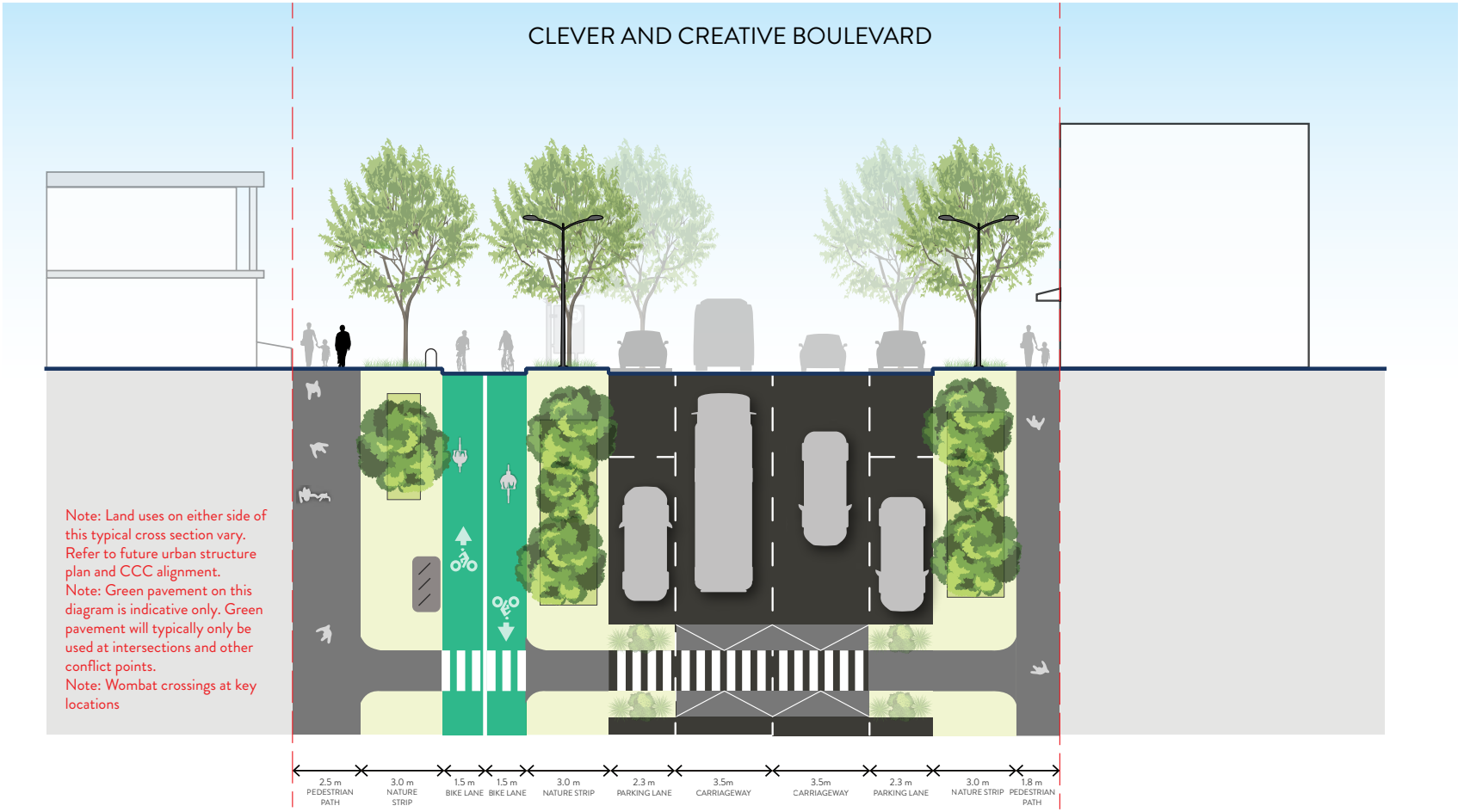
A2.2 STREET TYPES & CROSS SECTIONS



Cross-Section 11A	17.0m

Refer to Servicing Placement Guidelines for direction on utility servicing provision

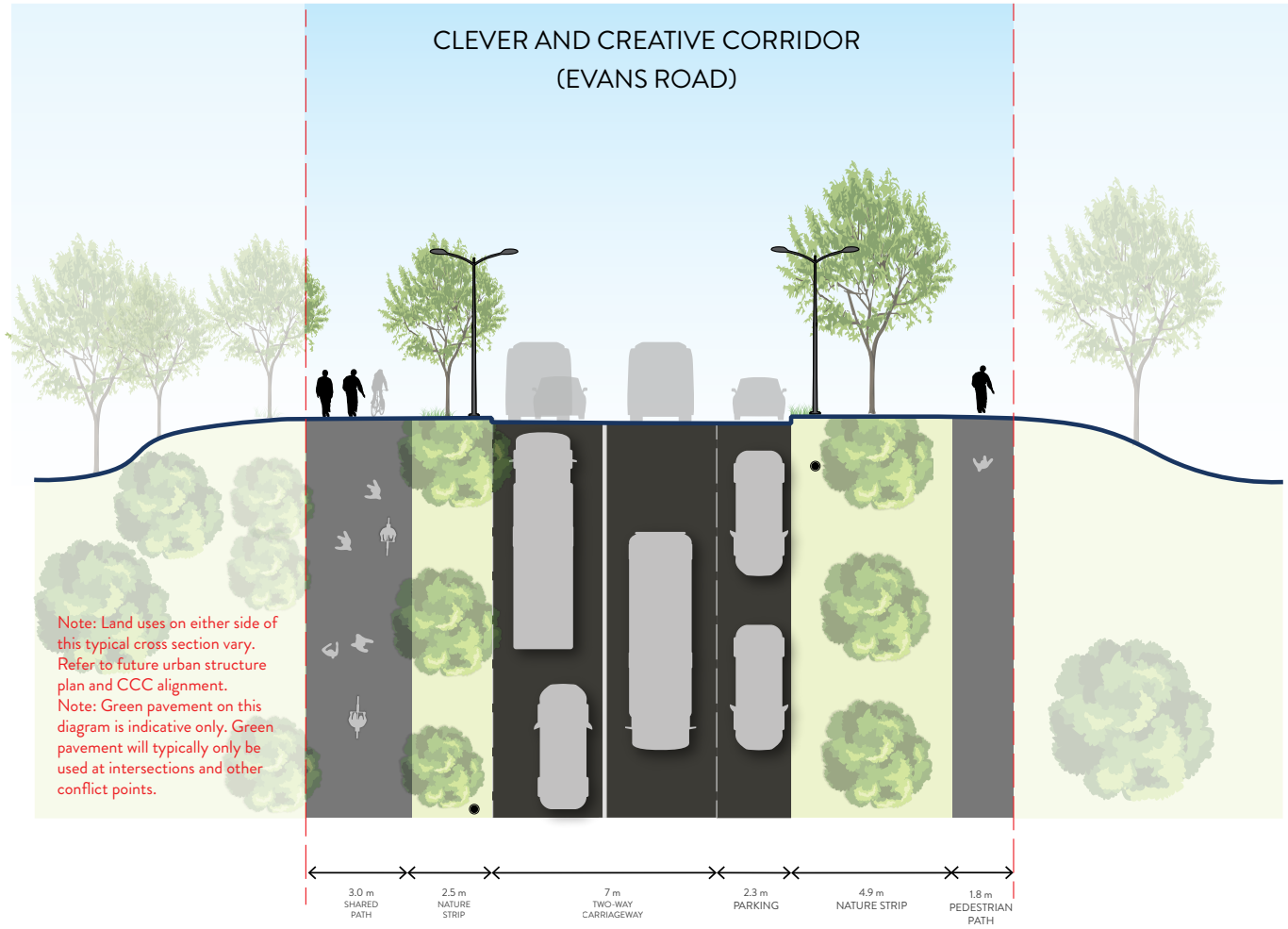
A2.2 STREET TYPES & CROSS SECTIONS



Cross-Section 12	27.9m

Refer to Servicing Placement Guidelines for direction on utility servicing provision

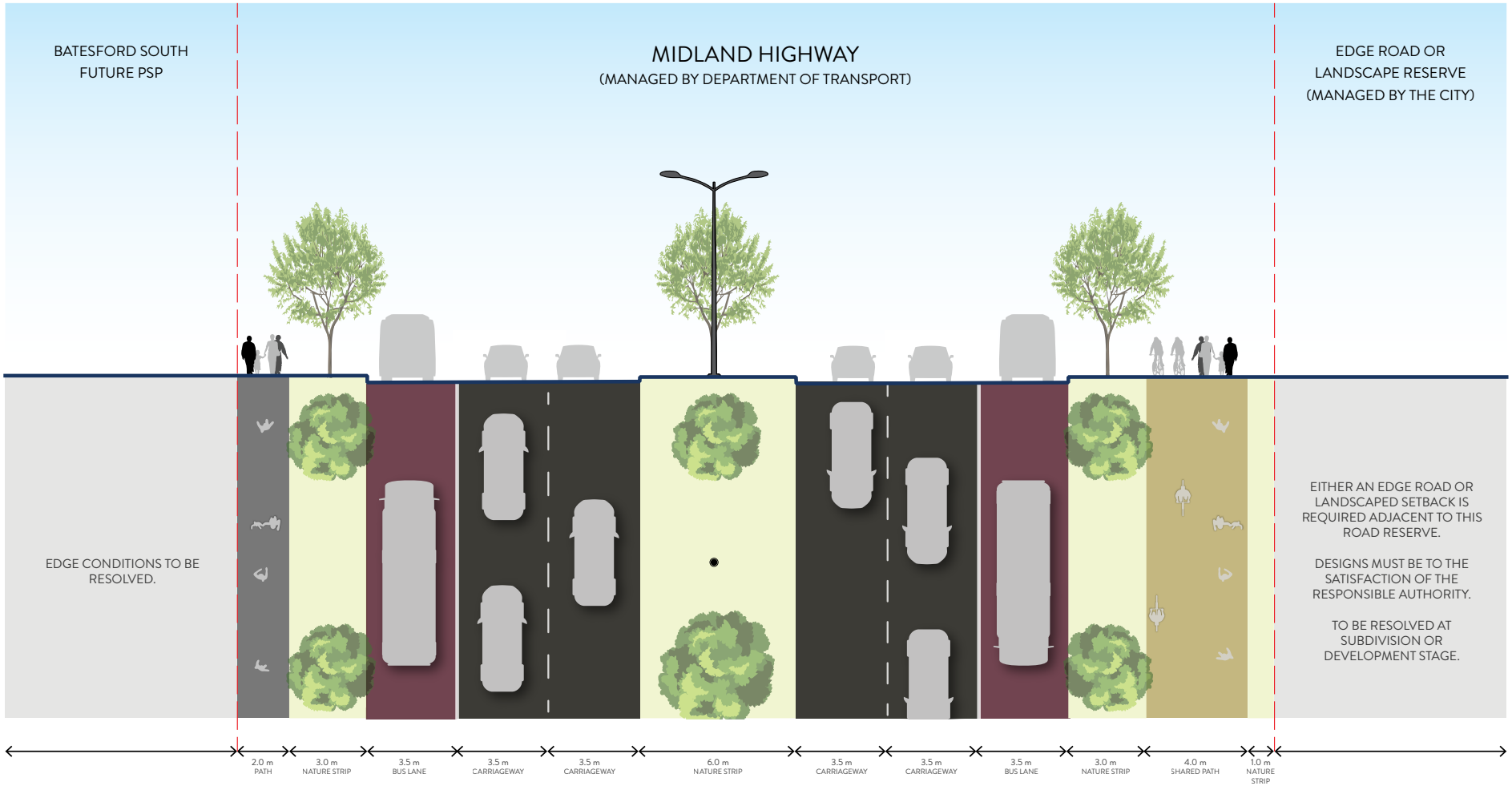
A2.2 STREET TYPES & CROSS SECTIONS



Cross-Section 15	21.5m

Refer to Servicing Placement Guidelines for direction on utility servicing provision

A2.2 STREET TYPES & CROSS SECTIONS

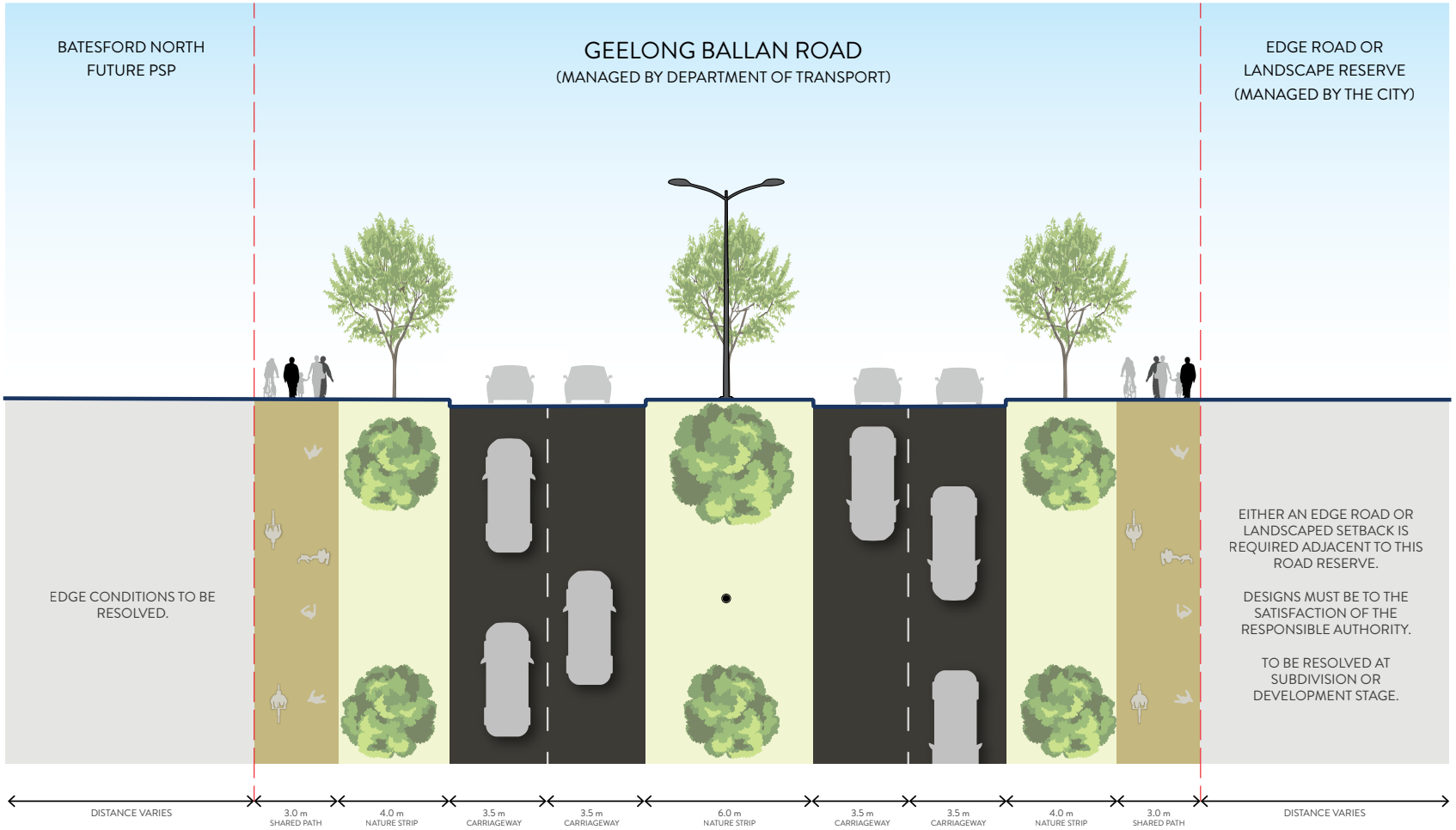


Note: Landuses on either side of this typical cross section vary. Refer to future urban structure plan.

Cross-Section 16	40.0m

Refer to Servicing Placement Guidelines for direction on utility servicing provision

A2.2 STREET TYPES & CROSS SECTIONS



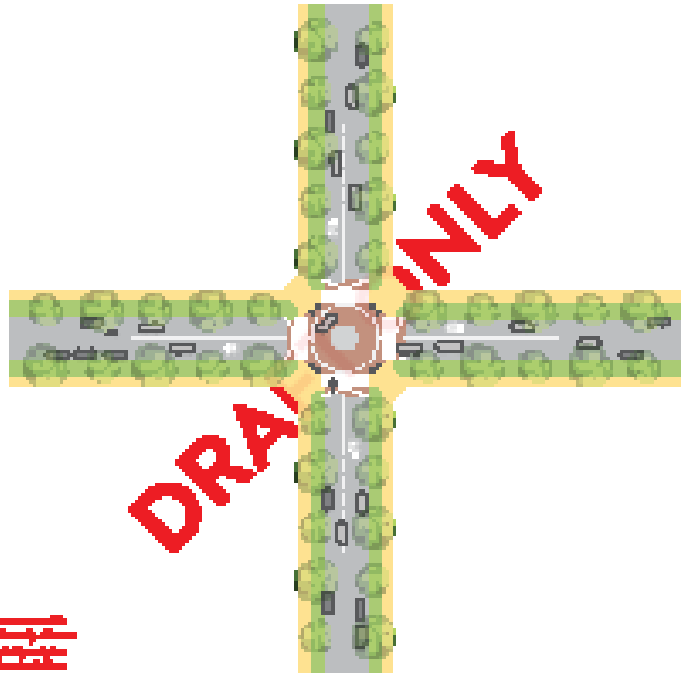
Note: Landuses on either side of this typical cross section vary. Refer to future urban structure plan.

Cross-Section 17	34.0m

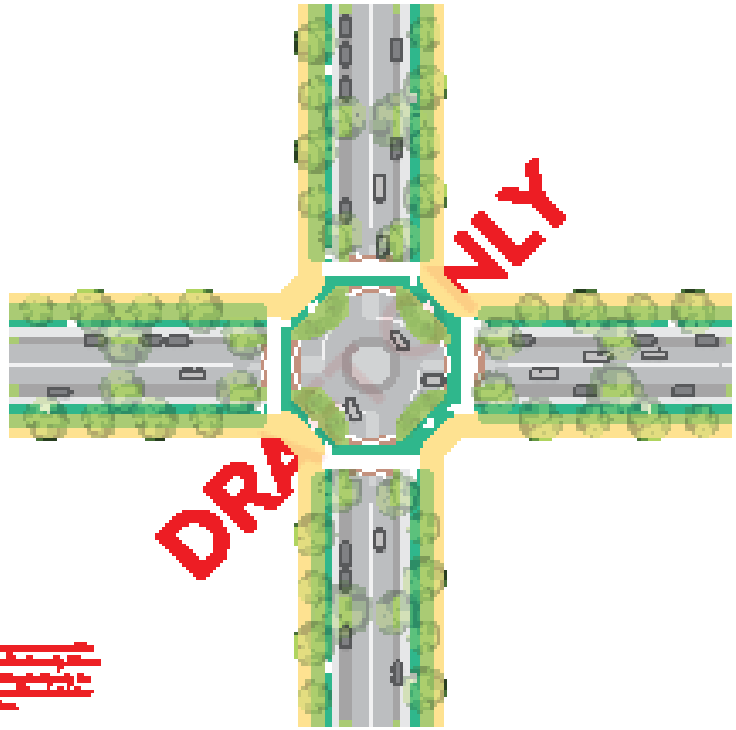
Refer to Servicing Placement Guidelines for direction on utility servicing provision

A2.3 STREET INTERSECTIONS

Compact Roundabout
Local Access Streets

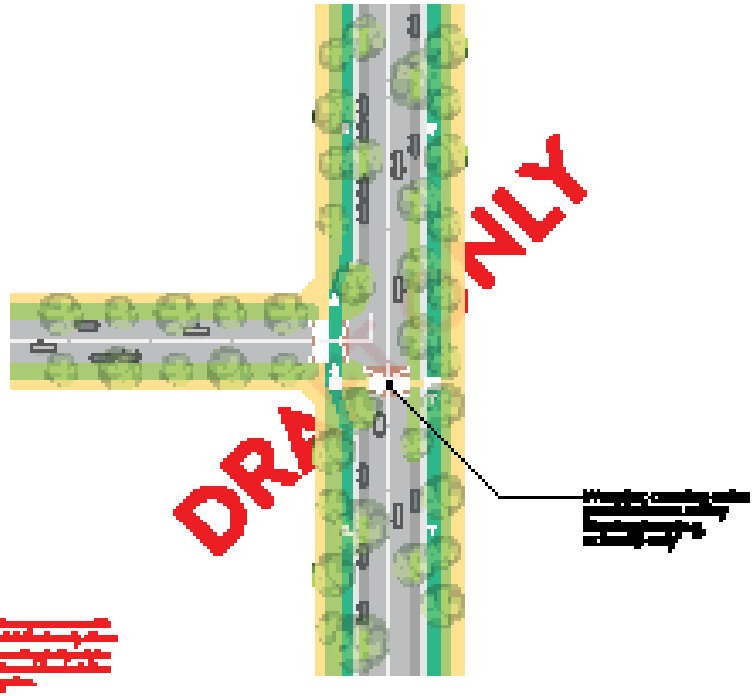


Roundabout
Connector Roads

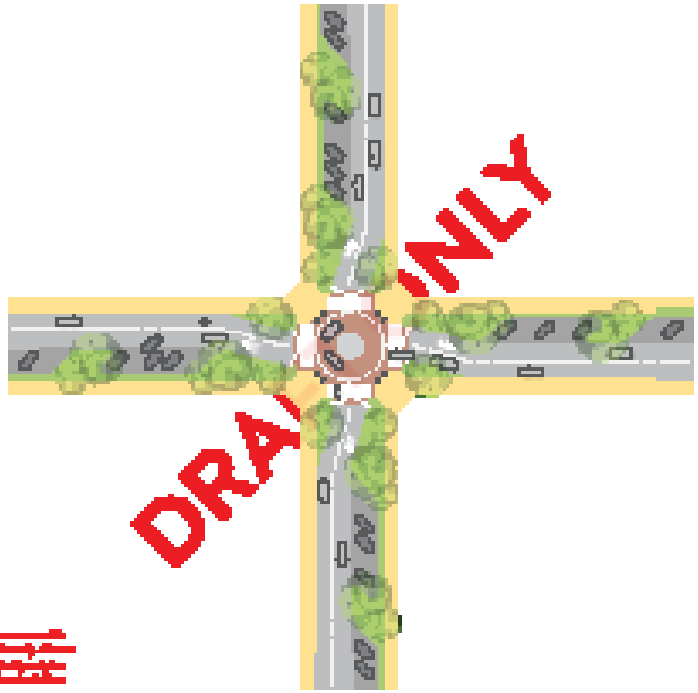


A2.3 STREET INTERSECTIONS

Give Way T-Intersection
Local Access Streets + Connector Road



Compact Roundabout
Parking Streets



A3. OPEN SPACE DELIVERY REQUIREMENTS

T19. OPEN SPACE DELIVERY REQUIREMENTS

OPEN SPACE CATEGORY	DESCRIPTION	GENERAL SHAPE GUIDELINE	CATCHMENT REQUIREMENT	MINIMUM EMBELLISHMENTS	EXTRA EMBELLISHMENTS*
Local Community (Passive) Park	• Park developed to meet basic non- competitive recreational pursuits in a predominantly informal setting.	• Broadly square or rectangular with no sides greater than 2:1 • 0.5-1ha • > 0.5ha when attached to encumbered open space suitable for secondary recreation.	• Services the immediate neighbourhood, approx. 750-3000 people. • Urban and suburban: within 400m from 95% of residents. • Walking or cycling is the preferred mode of transport to these parks, therefore suburban footpaths, pram ramps, pedestrian crossings and refuge islands are key infrastructure items to facilitate ease of access.	• Designed for short stay visitation. • Embellishment may include a playground, shade trees, lawn 'kick and throw' area and seating, preferably arranged to encourage social interaction. • On street carparking, external footpaths, accessible internal concrete path network to play/social space, seating, park name signage, landscape - trees, garden beds, lawn area and vehicle access point. • Utilities such as electrical, potable water, recycled water and sewer require tapping points at park boundary. • In employment areas an emphasis on break-out social spaces such as seating, picnic tables, shelter in a pleasant, landscaped environment.	• Shade sails for play areas, shelter or shade structure for social seating area, drinking fountain, picnic table, disability wheelchair access, recreation court / goals / equipment, lighting, irrigation, fencing / vehicle access barriers.
District Community (Passive) Park	• Park developed to meet a range of non- competitive recreational pursuits in a predominantly informal setting.	• Broadly square or rectangular with no sides greater than 3:1 • 1-2.5ha ideally.	• Services several neighbourhoods, approx. 3000-5000 people. • Urban and suburban: within 1km from 95% of residents. • Walking or cycling to these parks is facilitated through footpaths, bike lanes and shared path network. • Proximity to public transport. • On street parking, occasionally (where warranted) onsite parking.	• Designed for long stay visitation. • Embellishment may include multi-age playground, informal recreation infrastructure (court/skate bowls/goals etc), shade sails/trees, large covered social space, picnic area, drinking fountains, bicycle racks, irrigated landscape and lawn 'kick and throw' area. • Mix of seating options, preferably arranged to encourage social interaction. BBQ's and public toilets. • High emphasis on accessibility within the park and infrastructure. • Utilities such as electrical, potable water, recycled water and sewer require tapping points at park boundary and connection to relevant infrastructure.	• On site carparking. Shade structures for play areas, lighting, fencing / vehicle access barriers.
Town Square	• Predominately hard landscaped open space with an urban character suitable for respite, small events, social gatherings.	• Broadly square or rectangular with no sides greater than 3:1 • <0.3ha	• Located in the core of activity centres. • Urban catchment: 200m.	• Designed for long stay visitation. • Embellishments support workers, visitor and resident usage, gathering and minor events. • Hardstand ground plane, landscaped beds (on ground and/or raised), various seating options, shade, drinking fountain, bike racks, smart technologies, accessible power outlets, USB charging points, public art, irrigation, park & wayfinding signage. Public lighting & 3 phase power. • Public toilets located within town centre retail buildings.	• Shelter, landscape pots/ containers, large screen tv (by negotiation). • Outdoor dining adjacent in commercial private land.
District Sports (Active) Reserve	• An outdoor open space which provides a venue for organising sporting activities such as team completions, physical skill development and training. • Playing surfaces can be accessed by the general community outside club licence times. • Balance of grounds can contain informal recreational components such as play space, skate bowls which are always publicly accessible.	• Broadly square or rectangular with no sides greater than 3:1 • 8-15ha (Preference 12-15ha)	• Services several neighbourhoods, approx. 3000-5000 people. • Urban and suburban: within 1km from 95% of residents. • Walking or cycling to these parks is facilitated through footpaths, bike lanes and shared path network. • Proximity to public transport is desirable. • Onsite parking according to sporting requirements. Overflow on street parking.	• Sporting grounds and associated infrastructure according to sport provision requirements. • Pavilion and carparking (size depending on sport usage). • Associated passive infrastructure (play space, informal recreation). • Public toilets external to pavilion.	• Shelters, spectator seating, electronic scoreboards, netting, amphitheatre spectator seating.

*Items listed in Embellishments are at the discretion and approval of the responsible authority.

A3. OPEN SPACE DELIVERY REQUIREMENTS

All public open space (excluding conservation areas) shall be designed and developed to a standard that satisfies the requirements of the City prior to the transfer of the land, including the following:

- All public landscaped areas must be designed and constructed in accordance with relevant Australian standards.
- Open spaces are to be designed and developed to assist in promoting a 'sense of place' and cater for a broad range of users, by providing a mix of spaces and planting to support structured and unstructured play for all ages and abilities.
- Installation of park furniture including BBQs, shelter, tables, rubbish bins, playgrounds and other play elements such as multi- courts and hit-up walls, rubbish bins and appropriate paving to support these facilities must be consistent with the classification and hierarchy of the open space as listed in Table 11 Open Space Delivery Guide and the City's Sustainable Communities Infrastructure Development Guidelines (including all relevant updates).
- Open space must not be delivered in a standalone stage, it must be included with a stage containing residential lots.
- The design and layout of waterway corridors and other encumbered open space is to maximise the potential for integration of recreational uses, utility infrastructure and storm water quality assets, where it does not conflict with the primary function of the land.
- Trees at 75% maturity to shade no less than 25% of the open space.
- Vehicle exclusion devices (fence, bollards, or other suitable method) and maintenance access points to be installed as requested by the responsible authority.
- Where fencing of local parks is required, it must be lowscale and designed to guide appropriate movement and access rather than act as a barrier. Design and materials shall complement the park setting.
- Path networks associated with open space to include way finding which clearly identifies key destinations and communicates necessary information to all users.
- Signage should clearly identify key destinations and communicates necessary information to all users.
- Any pedestrian link through a dedicated trail, drainage reserve/corridor or adjoining the road network to include a provision of park seating at appropriate intervals.
- Appropriately scaled lighting shall be installed along all major pedestrian thoroughfares traversing the public open space and active transport network to the satisfaction of the responsible authority.
- All structures are to be sited above the 1% AEP flood event level and designed to integrate with and complement rather than dominate the landscape.
- Paths are to be designed above the 1% AEP. Where this is not possible, they must comply with Melbourne.
- Water's Shared Pathways Guidelines.
- Opportunities should be considered for appropriate urban art, to the satisfaction of the City's Arts & Culture Department.

A4. ACTIVITY CENTRES

T20. NAC PRECINCT KEY DESIGN INTENT

The NAC Precinct, which comprises the Neighbourhood Activity Centre (C1Z) and the surrounding Mixed Use Zone (MUZ) as depicted on *Plan 5. Future Place Based Plan*, shall be the vibrant heart of the neighbourhood, where goods, services and employment can be accessed through public transport, cycling or a 20-minute walk, Co-located with community facilities, the NAC will enhance accessibility and active living, through a healthy mix of uses, where residential co-exists with ground-level retail that spills into the public realm creating an active, vibrant and safe environment. The below NAC Key Design Intents will enable a walkable, mixed-use environment where the public realm is the focus, sustainable design outcomes are embedded, and access to goods, services, employment and transit supports a true 20-minute neighbourhood can be delivered.

NAC PRECINCT KEY DESIGN INTENT	
01.	Provide a high-quality visual and physical connection through the NAC to public realm features, such as the town square and the Clever and Creative Boulevard.
02.	Provide a Town Square (Civic Open Space) adjoining the CCB in accordance with *Table 9 Open Space Delivery Guide* and *Table 13 Precinct Infrastructure*, creating a 'key gathering place' by co-locating the Town Square at the intersection of the Key Pedestrian Street and the CCB, and providing a key transit stop at this location.
03.	Design the Key Pedestrian Street to be generally in accordance with the Key Pedestrian Street cross sections provided in *Appendix 2 Complete Streets.*
04.	Provide safe and continuous pedestrian-prioritised connections from the NAC precinct to the surrounding active transport links in the high amenity areas surrounding the NAC precinct, and to the key transit stops along the CCB.
05.	Provide a diverse mix of retail, office and commercial uses at ground floor level.
06.	Consolidate parking across the NAC Precinct where possible and sleeve car parking areas with built form that activates street frontages, primarily along the Key Pedestrian Street and the CCB, and secondarily to surrounding connector roads.
07.	Deliver multi-level buildings in the NAC precinct that provide opportunities for mixed use development, including community and residential uses on upper levels.
08.	Sleeve anchor retail with finer grain complementary uses along the frontage to the Key Pedestrian Street and provide primary pedestrian access to anchor retail from Key Pedestrian Street.
09.	Avoid loading bay access for anchor retail from the CCB.
10.	Provide active frontages and avoid blank facades along the Key Pedestrian Street, Town Square and the CCB. Street based retail centre designs are preferred. Internalised mall designs should be avoided.

NAC PRECINCT KEY DESIGN INTENT	
11.	Provide primary frontages to the CCB. Primary frontages include building entrances, lobbies, balconies, front yards, bike parking and high-quality pedestrian safe landscaping.
12.	Deliver Landmark Building Architecture in key locations where they will contribute to the character of and wayfinding within the NAC and the surrounding precinct. Key locations include the intersection between connector roads and the CCB.
13.	Provide a transition of densities and built form design between the NAC and the surrounding residential area by developing higher density residential within the Mixed-use amenity area, and providing vehicular access from the rear, particularly on sites directly facing the NAC.
14.	Identify locations for key landscape design features (artwork/sculpture) such as public art, sculptures, street furniture, and landscaping.
15.	Ensure the design of the NAC Precinct integrates Aboriginal cultural values and interpretation into the public realm, through materials, artwork, planting and storytelling.
16.	Identify locations for awnings, verandahs or other weather protection devices along Key Pedestrian Streets and the Town Square to support pedestrian comfort and encourage year-round outdoor activity.
17.	Incorporate a high-quality landscape and public realm treatment along the CCB, Key Pedestrian Street and Town Square, including forecourts, street trees, seating, lighting, and public art, to reinforce the role of the NAC as the civic heart.
18.	Ensure that loading bays, service areas, utilities and waste storage are screened and located away from key pedestrian frontages and key gathering spaces.
19.	Ensure the design of buildings has regard to long-term adaptability between commercial, retail and community uses.
20.	Provide an accessible, permeable and functional urban structure of blocks, laneways, and streets.
21.	Locate anchor businesses to encourage pedestrian movement along key streets and 'key gathering spaces'.
22.	Avoid conflicts between pedestrians, cyclists and other modes of transport by providing well delineated and connected movement networks.
23.	Use high-quality finishes and design elements in buildings and the public realm

A4. ACTIVITY CENTRES

T21. ACTIVITY CENTRE & COMMERCIAL DEVELOPMENT DESIGN PRINCIPLES

DESIGN PRINCIPLE	THIS MAY LOOK LIKE...	CONSIDER AS RELEVANT
PRINCIPLE 1 URBAN STRUCTURE, LAND USE & ACTIVATION Activity Centres and commercial development in the precinct will be designed to be legible and highly permeable at the human scale with vibrant activity pockets to enrich the pedestrian experience.	• **Varying shopfront widths, floor space areas, opportunities for local business investment and extended hours of activation.** • **Concentrating mixed-use development within and immediately adjoining the NAC core to support activation, viability and day-to-night use of the centre.** • **Flexible spaces, like carparks that can host pop-up interim uses etc in non-peak times.** • **A permeable structure of blocks, laneways and streets which draws in people from the surrounding residential areas.**	Clause 11.02-2L Northern and Western Geelong Growth Areas
PRINCIPLE 2 MOVEMENT & PARKING Activity Centres and commercial development in the precinct will be designed to prioritise pedestrian safety and experience and be accessible by all modes including cycling and public transport, while enabling private vehicle access.	• **Providing shading for pedestrians and active transport users.** • **Embedding pedestrian priority in the street design e.g. zebra crossings, variations in road material, increased landscaping, bollards, lighting, reduced road widths.** • **Providing safe access to bicycle parking facilities and transit stops** • **Concealing vehicle parking areas from the CCB and town square** • **Encouraging shared parking provisions**	Clause 11.02-2L Northern and Western Geelong Growth Areas Clause 18.02-1S Walking Clause 18.02-2S Cycling Clause 18.02-3S Public transport Clause 15.01-1L-01 Development in activity centres Clause 15.01-4S Healthy neighbourhoods

DESIGN PRINCIPLE	THIS MAY LOOK LIKE...	CONSIDER AS RELEVANT
PRINCIPLE 3 SENSE OF PLACE Activity Centres and commercial development in the precinct will create a sense of place with high quality engaging urban design that responds to the unique locality, vibrant residential contributions, and well defined public spaces.	• **Delivering fine-grain urban fabric** • **Integrating the built form with the wider landscape setting, CCB and adjoining land uses.** • **Weather conscious design of public spaces e.g. north facing, protected from prevailing winds, weather and overshadowing** • **Supporting night-time economy e.g. lighting, passive surveillance**	Clause 15.01-1S Urban design Clause 15.01-4S Healthy neighbourhoods
PRINCIPLE 4 BUILDING DESIGN The design of buildings will respond to the unique character and place of the precinct to integrate with and promote activity to the CCB and in public spaces.	• **Providing a positive sense of definition for the public realm e.g. be built on or close to the street boundary and/or key public spaces.** • **Considering treatments that can activate façades e.g. murals, green walls, and architectural articulation.** • **Flexible building design that can support different uses** • **Encourage variation of façade materiality, roof forms, treatments and articulation between adjoining buildings.**	Clause 15.01-1L-01 Development in activity centres Clause 15.01-2S Building design

A4. ACTIVITY CENTRES

T21. ACTIVITY CENTRE & COMMERCIAL DEVELOPMENT DESIGN PRINCIPLES

DESIGN PRINCIPLE	THIS MAY LOOK LIKE...	CONSIDER AS RELEVANT
PRINCIPLE 5 **ESD & ZERO CARBON** Activity Centres and commercial development in the precinct will demonstrate best practice environmentally sustainable design and zero carbon from the design stage through to construction and operation.	• **Incorporating strategies to minimise the urban heat island affect e.g. light roofs, canopy cover, finding alternatives to hardscapes surfaces** • **Embracing opportunities to reduce green house gas emissions at construction and in ongoing operation** • **Delivering spaces that encourage sustainable ransport e.g. bicycle parking, end of trip facilities, shade structures, equitable access** • **Incorporating WSUD principles** • **Providing comfortable public spaces e.g. shade provision, wind protection etc.** • **Exploring opportunities to use recycled materials**	Clause 15.01-2L Environmentally sustainable development
PRINCIPLE 6 **STREET FURNITURE AND URBAN ART & DESIGN** Public art and street furniture in the precinct will be functional, visually appealing and contribute to a unique sense of place.	• **Engaging local creatives with cultural connections to the region** • **Considering how public art can support the safety and amenity of the area** • **Support community use of public spaces e.g. through locating street furniture in highly visible areas and close to or adjoining pedestrian desire lines/gathering spaces** • **Clear and consistent wayfinding**	

A5. SERVICE PLACEMENT GUIDELINES

T22. SERVICE PLACEMENT GUIDELINE

SERVICE	UNDER PEDESTRIAN PAVEMENT	UNDER NATURE STRIPS	DIRECTLY UNDER STREET TREES	UNDER KERB	UNDER ROAD PAVE-MENT	WITHIN ALLOT-MENTS	NOTES
Sewer	Preferred	Possible	Not Preferred	No	Not Preferred	Possible (1)	1. Rear easement sewer and drainage lines are common on allotments. Less common are sewer and drainage easements within front setback of allotment.
Potable Water	Not Preferred (2)	Preferred	Not Preferred	No	Possible (3)	No	2. Property connections under hard services require Fitzroy boxes. 3. Placement of services under road pavement is typically not preferred by authorities. However, consideration may be given to placement of services beneath parking bays and bicycle lanes.
Recycled Water	Not Preferred (2)	Preferred	Not Preferred	No	Possible (3)	No	4. Property connections under hard services require Fitzroy boxes. 5. Placement of services under road pavement is typically not preferred by authorities. However, consideration may be given to placement of services beneath parking bays and bicycle lanes.
Gas (4)	No	No	No	No	No	No	6. The precinct will not to be serviced by gas. If and where gas must be provided to a critical non-residential land use, preferred placement for gas services is under nature strips or directly under trees (under pedestrian pavement also possible).
Electricity	Preferred (5, 6)	Preferred (6)	Not Preferred	No	Not Preferred	No	7. Subject to power authority approval. 8. Pits are to be placed either wholly within the footpath or wholly within the nature strip.
FTTH/ Telecomm-unications	Possible (6)	Preferred	Not Preferred	No	Not Preferred	No	9. Pits are to be placed either wholly within the footpath or wholly within the nature strip.
Drainage	Not preferred	Possible	Not Preferred	Preferred	Not Preferred	Not Preferred (1)	10. Rear Easement sewer and drainage lines are common on allotments. Less common are sewer and drainage easements within front setback of allotment.
Trunk Services	Possible	Possible	Not Preferred	Possible	Possible	No	

Notes:

- Placement of services under street trees and nature strips is not preferred by Council. Service placement must not negatively impact the long-term growth of any street tree.
- In accordance with IDM SD630 a tree root zone of 0.6 m depth must be applied where services are placed under nature strips. Any service installation must be at a greater depth than the tree root zone.
- Trees are not to be placed directly over property service connections.
- Placement of services under road pavement is to be considered when service cannot be accommodated elsewhere in road reserve. Placement of services beneath edge of road pavement/parking bays is preferable to within traffic lanes.
- Where allotment size/frontage width allows adequate room to access and work on a pipe .
- Place water supply on high side of road.
- Place services that need connection to adjacent properties closer to these properties.
- Place trunk services further away from adjacent properties.
- Place services that relate to the road carriageway (e.g. drainage, street light electricity supply) closer to the road carriageway.
- Maintain appropriate services clearances and overlap these clearances wherever possible.

A6. CANOPY COVER

A6.1 EXAMPLE TREE SPECIES LIST

T23. EXAMPLE TREE SPECIES LIST

SPECIES	TREE CANOPY DIAMETER (M)	STREETSCAPE TREE LISTS (BY DIAMETER)			
		3-7M	5-20M	7-20M	10-20M
Cupressus sempervirens 'Stricta'	3				
Quercus palustris 'Pringreen'	3				
Koelreuteria 'Golden Candles'	3				
Prunus cerasifera 'Oakville Crimson Spire'	3				
Elaeocarpus eumundii	4				
Lagerstroemia indica	4				
Prunus cerasifera 'Nigra'	4				
Prunus x blireana	4				
Pyrus calleryana 'Capital'	4				
Pyrus calleryana 'Southworth Dancer'	4				
Brachychiton 'Griffith Pink'	5				
Tilia 'Greenspire'	5				
Zelcova 'Mushashino'	5				
Acer platanoides 'Globosum'	6				
Banksia marginata	6				
Pyrus calleryana 'Chanticleer'	6				
Pyrus calleryana x Pyrus betulaefolia 'Edgewood'	6				
Pyrus fauriei 'Korean Sun'	6				
Ulmus parvifolia 'Todd', 'Burnley Select', 'Inspire'	6				
Acer freemanii 'Jeffersred'	8				
Acer negundo 'Sensation'	8				
Brachychiton populneus	8				
Fraxinus excelsior 'Aurea'	8				
Fraxinus pennsylvanica 'Urbanite'	8				
Fraxinus pennsylvanica 'Cimmaron'	8				
Robinia pseudoacacia 'Frisia'	8				

SPECIES	TREE CANOPY DIAMETER (M)	STREETSCAPE TREE LISTS (BY DIAMETER)			
		3-7M	5-20M	7-20M	10-20M
Gleditsia triacanthos var. inermis 'Shademaster'	10				
Lophostemon confertus	10				
Melia azederach	10				
Fraxinus angustifolia 'Raywood'	12				
Ulmus glabra 'Lutescens'	12				
Waterhousea floribunda	12				
Brachychiton acerifolius	15				
Eucalyptus sideroxylon	15				
Eucalyptus sideroxylon 'Rosea'	15				
Quercus palustris	15				
Platanus acerifolia	20				
Quercus robur	20				

5.0

GLOSSARY

5.0 GLOSSARY

A

Annual Exceedance Probability (AEP)
The probability that a given rainfall total accumulated over a given duration will be exceeded in any one year. Active open space Land designated for formal outdoor sports. May also include passive recreation opportunities. Active transport Relates to physical activity undertaken as a means of transport including walking, cycling and the use of other non-motorised vehicles.

Amenity Areas
Areas adjacent to the NAC, the Clever and Creative Boulevard, open spaces and public transport routes where medium density and a diverse range of building forms is encouraged. Appropriate non-residential uses are supported in order to support 20-minute neighbourhoods. These areas have been selected for their proximity to activity centres, sustainable transport link and placemaking opportunities.

B

Blue green infrastructure
An urban area designed to incorporate natural systems that provide the ecological and amenity value associated with urban greening, and also provide stormwater management. Often 'green' assets (trees, parks, gardens) and 'blue' assets (WSUD drainage areas and flood storage) are planned separately, however often the same asset can provide multiple services that benefit both 'green' and 'blue' objectives.

C

Canopy tree
A tree with spreading branches with a diameter no less than 3m at maturity.

Cultural Heritage Management Plan (CHMP)
A written report prepared by a Heritage advisor that assesses the potential impact of a proposed activity on Aboriginal cultural heritage. It then outlines measures to be taken before, during and after an activity to manage and protect Aboriginal cultural heritage in the area. For some activities proposed in some areas, a CHMP is required by law.

Community Infrastructure Levy (CIL)
The Planning and Environment Act 1987 (the Act) enables the DCP system to impose a community infrastructure levy (levy) to fund projects involving the construction of community buildings or facilities. Applied to new development for community infrastructure (can include libraries, sporting facilities etc) and is paid by a landowner prior to a Building Permit being issued (unless agreed to be paid by the developer).

Crime Prevention through Environmental Design (CPTED)
A multi-disciplinary approach of crime prevention that uses urban and architectural design and the management of built and natural environments. Wide-ranging recommendations to architects include the planting of trees and shrubs, the elimination of escape routes, the correct use of lighting, and the encouragement of pedestrian and bicycle traffic in streets.

D

Drainage corridor (DC)
An above-ground swale, gully or impression in the landscape that carries stormwater runoff or spring water.

Development Contributions Plan (DCP)
The Planning and Environment Act 1987 (the Act) enables the DCP system to impose a community infrastructure levy (levy) to fund projects involving the construction of community buildings or facilities. The requirements for development proponents to contribute towards basic/essential infrastructure required to support development of the precinct.

Design Guidelines
Prepared by subdivision permit applicant as a condition of permit to address dwelling/lot level sustainability. May include considerations such as housing footprint, renewable energy generation and storage, passive heating and cooling, urban heat mitigation, ground permeability and vegetation outcomes.

Development Infrastructure Levy (DIL)
Applies to developments and contributes to funding development infrastructure.

Development Services Scheme (DSS)
A masterplan for drainage in a specific catchment area. The scheme guides the standards in order to provide effective flood protection, water quality and waterway health. The DSS includes, but is not limited to, all documents relevant to the water quality treatment and concept design of drainage assets in the Creamery Road Precinct.

E

Ecological Vegetation Classes (EVC)
Standard unit for classifying vegetation types in Victoria. EVCs are described through a combination of floristics, lifeforms and ecological characteristics, and through an inferred fidelity to particular environmental attributes.

Encumbered open space
Land that is constrained for development purposes.

- Environmental risks such as flooding and landslip
- Infrastructure and easements, such as utilities and drainage
- Retarding basins or wetlands
- Contamination or landfill
- Habitat conservation and native vegetation
- Heritage values
- Waterways and drainage
- Buffer areas
- Steep slopes

These areas may be used for a range of recreation activities (walking trails, sports fields), however is not provided as credit against public open space requirements.

Environmentally Sustainable Development (ESD)
A set of principles which aim to improve the health and comfort of buildings for occupants whilst at the same time reducing negative impacts on the environment. ESD can provide affordable living outcomes, improved comfort levels and environmental benefits.

I

Integrated Water Management (IWM)
A collaborative approach to planning that brings together all elements of the water cycle including sewage management, water supply, stormwater management and water treatment, considering environmental, economic and social benefits.

N

Neighbourhood Activity Centre (NAC)
The NAC Precinct is the area nominated as 'NAC Precinct' in *Plan 10 Activity Centres* which will require an Urban Design Framework be prepared prior to development. A NAC is a local centres that provide access to local goods, services and employment opportunities and serve the needs of the surrounding community. These centres serve smaller, local areas and have an important role in giving people the ability to meet most of their everyday needs within a 20-minute walk, cycle or local public transport trip of their home.

Net Developable Area (NDA)
Land within a precinct available for development. This excludes encumbered land, arterial roads, railway corridors, significant heritage, schools and community facilities and public open space. It includes lots, local streets and connector streets. Net Developable Area may be expressed in terms of hectare units (i.e. NDHa).

Net Developable Area – Residential
As for Net Developable Area but excluding commercial/ retail component of town centres and other existing or permitted non-residential land uses (e.g. golf course sites).

P

Permeable Street Network
This refers to the extent to which the urban structure permits, or restricts, the movement of people or vehicles through an area, and the capacity of the area network to carry people or vehicles. Walking and cycling is prioritised to create a direct and safe street network.

S

Strategic Assessment – Sb. 15 requests addition
A landscape-scale assessment undertaken under Part 10 of the Environment Protection and Biodiversity Conservation Act 1999. Unlike project-by-project assessments, which look at individual actions, strategic assessments can consider a much broader set of actions over a much larger scale and timeframe, such as a plan, policy, or program. The Geelong Growth Areas Strategic Assessment applies to the Cowies Creek corridor within the Creamery Road Precinct, except where approvals under other parts of the EPBC act apply.

5.0 GLOSSARY

U

Unencumbered open space
Land designated for open space without encumbrances such as easements, flooding, waterways/drainage, conservation etc. Only unencumbered open space is recognised as open space development contribution.

Urban Design Framework (UDF)
An Urban Design Framework (UDF) is a strategic planning tool that sets out a design vision for the future development of a place. It includes aims for the future area which may be brought into force by a planning scheme amendment.

W

Works in Kind (WIK)
Either works or land or a combination of both that a developer provides under a WIK agreement in lieu of paying cash. Developers may elect to provide DCP infrastructure items to offset their development contributions liability, this is known as providing 'works in kind'.

6.0

REFERENCES

6.1 Abbreviations 180

6.1 ABBREVIATIONS

CCC
Clever and Creative Corridor

CCB
Clever and Creative Boulevard

LCC
Local Convenience Centre

NAC
Neighbourhood Activity Centre

NWGGA
Northern and Western Growth Areas

NVPP
Native Vegetation Precinct Plan

PSP
Precinct Structure Plan

WGGA
Western Geelong Growth Area

WLRB
Wetland and Retarding Basin

CITY OF GREATER GEELONG
PO Box 104
Geelong VIC 3220
P: 5272 5272
E: contactus@geelongcity.vic.gov.au
www.geelongaustralia.com.au

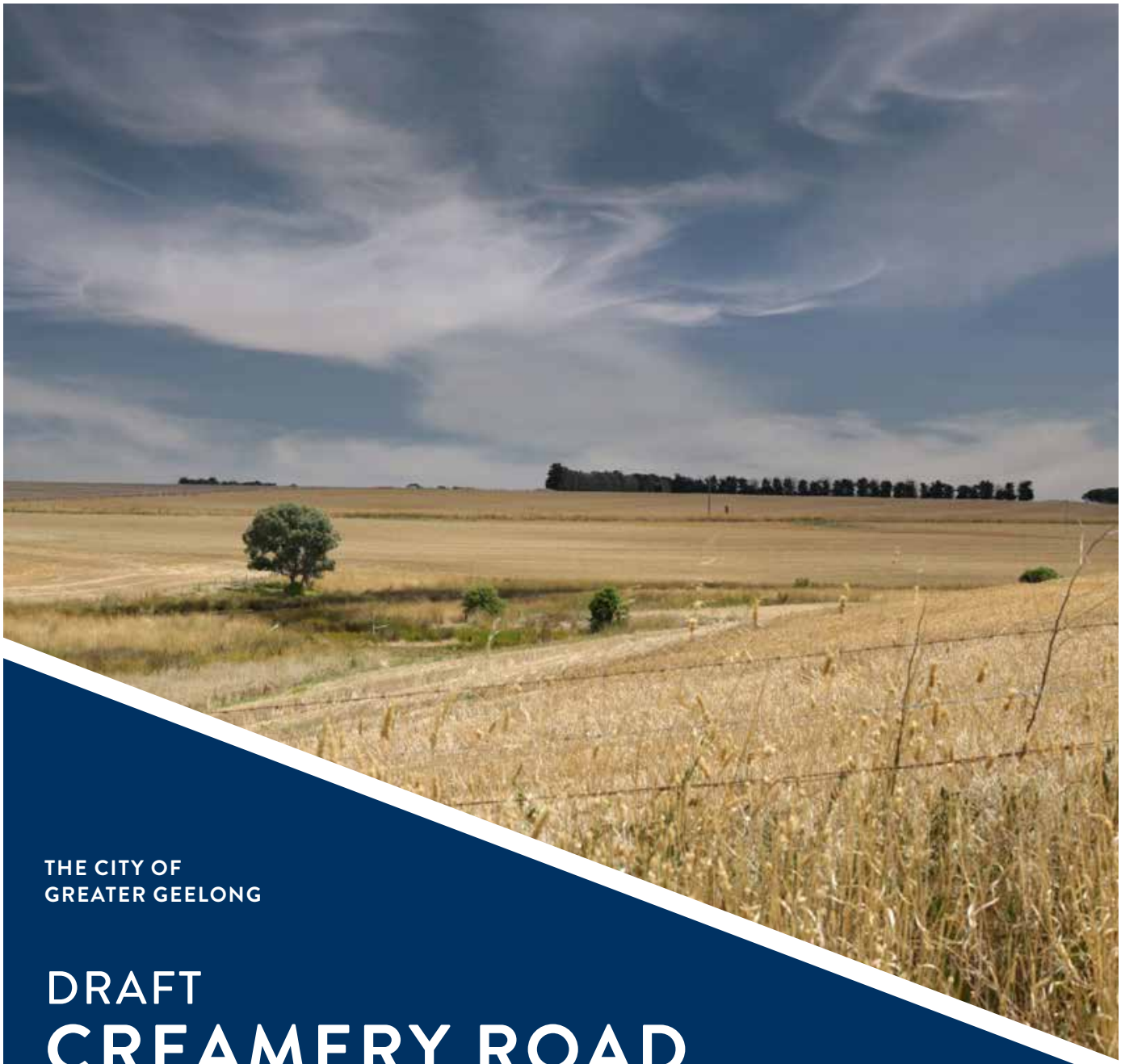
CUSTOMER SERVICE CENTRE
Wurriki Nyal
Wadawurrung Country
137-149 Mercer Street
Geelong VIC 3220

© City of Greater Geelong 2026

LATEST NEWS:

@CityofGreaterGeelong
@GreaterGeelong
@CityofGreaterGeelong
CityofGreaterGeelong

CITY OF GREATER GEELONG

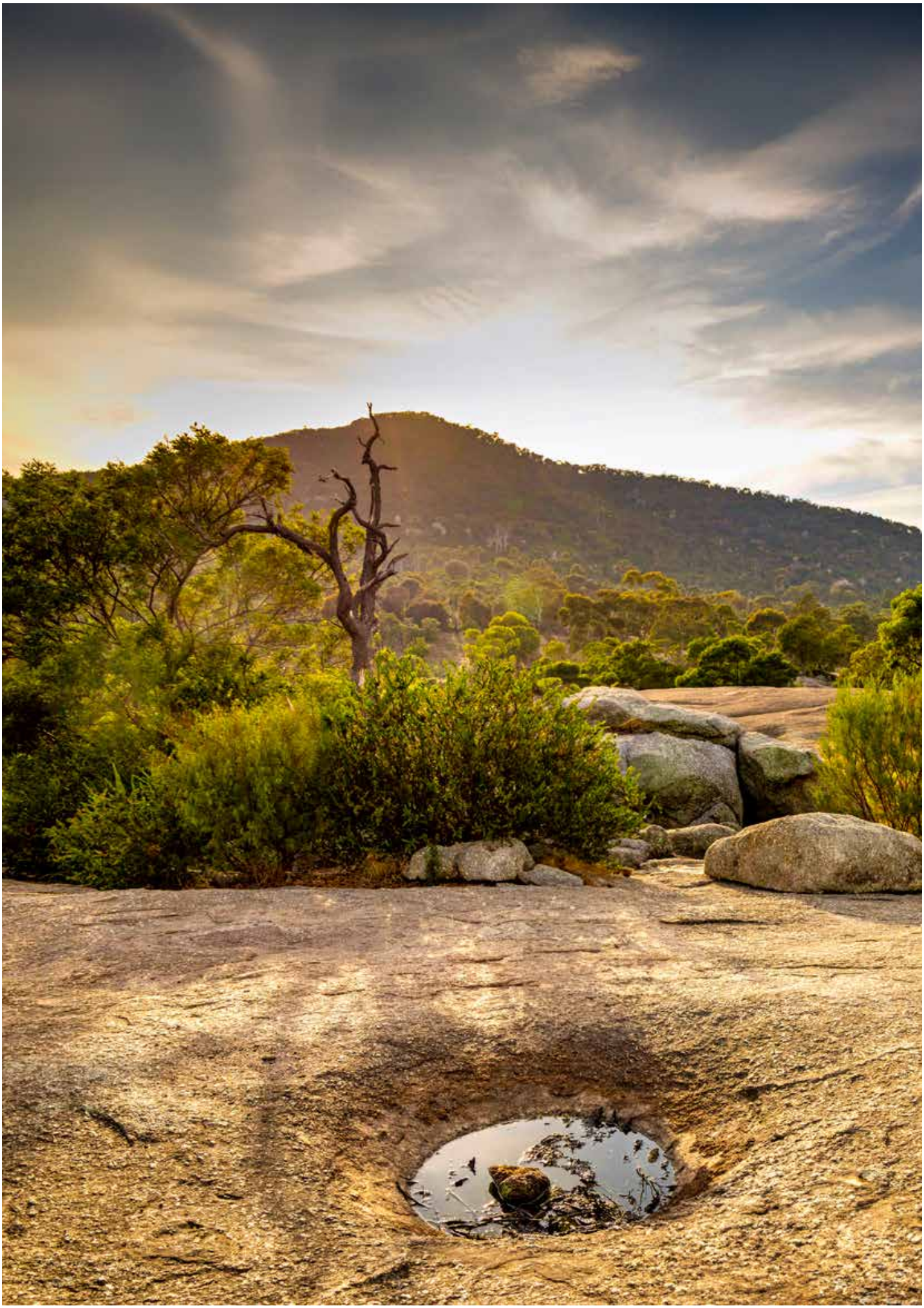


THE CITY OF
GREATER GEELONG

DRAFT CREAMERY ROAD DEVELOPMENT CONTRIBUTIONS PLAN

AUGUST 2026

CITY OF GREATER GEELONG



ACKNOWLEDGMENT OF COUNTRY

The City of Greater Geelong acknowledges the Wadawurrung People as the Traditional Owners of the land, waterways and skies of the North and Western Growth Areas. We pay our respects to their Elders, past and present.

We acknowledge all Aboriginal and Torres Strait Islander people who are part of our Greater Geelong communities today.

CONTENTS

1 SUMMARY OF CHARGES 6

2 INTRODUCTION 8

2.1 Report structure 9

2.2 Strategic basis 10

2.3 Planning and Environment Act 1987 10

2.4 Creamery Road Precinct Structure Plan 12

2.5 The area to which the development contributions plan applies 12

3 INFRASTRUCTURE PROJECT JUSTIFICATION 14

3.1 Items not included in the development contributions plan (developer works) 16

3.2 Community infrastructure vs development infrastructure 16

3.3 Project identification 17

3.4 Project timing 18

3.5 Transport projects 18

3.6 Drainage projects 22

3.7 Open space projects 25

3.8 Community projects 27

4. CALCULATION OF CONTRIBUTIONS 30

4.1 Calculation of net developable area and demand units 31

4.1.1 Net developable area (NDA) 31

4.1.2 Land budget and demand units 33

4.2 Calculation of contribution changes 34

4.2.1 Calculation of project costs 34

4.2.2 Estimate of land value 35

4.2.3 DCP and PSP preparation 35

4.2.4 Main catchment area 35

5. ADMINISTRATION 39

5.1 Payment of contributions and payment timing 40

5.1.1 Community Infrastructure Levy (CIL) 40

5.1.2 Development Infrastructure Levy (DIL) 41

5.1.3 Land and works-in-kind 42

5.1.4 Credit for over-provision 42

5.1.5 Funds administration 43

5.2 Construction and land value costs indexation 44

5.3 Review period 44

5.4 Adjustment to the scope of projects 45

5.5 Collecting agency (agency responsible for collecting infrastructure levy) 45

5.6 Development agency (agency responsible for works) 45

6. IMPLEMENTATION STRATEGY 47

6.1 Rationale for the implementation strategy 48

6.2 Implementation mechanism 49

7. APPENDICES 51

7.1 Appendix A - Property plan and property specific land budget 52

7.2 Appendix B - Project Sheets 54

PLAN AND TABLES

TABLES

T1	Summary of charges	4
T2	Transport DCP projects and land	19
T3	Drainage DCP projects and land	22
T4	Open space DCP projects and land	25
T5	Community DCP projects and land	27
T6	Summary land use budget	32
T7	Demand units and charge area	33
T8	Calculation of costs – Development Infrastructure Levy (DIL)	36
T9	Calculation of costs – Community Infrastructure Levy (CIL)	37

PLANS

P1	Place based plan for Creamery Road Precinct	11
P2	Main Catchment Area	13
P3	Transport DCP projects and land	21
P4	Drainage DCP projects and land	24
P5	Open space DCP projects and land	26
P6	Community DCP projects and land	28

SUMMARY OF CHARGES

1

SUMMARY OF CHARGES

PAGE TO BE UPDATED

Table 1 provides an overview of the project categories and charges included within this Development Contributions Plan ('DCP'). A more detailed explanation of apportionment, methods of calculation, and the description and costs of individual projects is included within the document.

T1. SUMMARY OF CHARGES

Note: All figures underlined subject to finalisation.

SUMMARY - NET DEVELOPABLE AREA (NDA) BY CHARGE AREA

CHARGE AREA	TOTAL COST OF CONTRIBUTION	CONTRIBUTION PER NDA
Charge Area 1	$170,317,638.41	$802,949.52

SUMMARY - DEVELOPMENT INFRASTRUCTURE LEVY (DIL)

PROJECTS	TOTAL COST OF PROJECTS	TOTAL COST OF PROJECTS ALLOCATED TO MCA	CONTRIBUTION PER NDA
Transport	$120,027,303.03	$51,010,992.32	$240,487.44
Open Space	$46,317,335.31	$44,268,635.31	$208,701.11
Community	$19,383,810.22	$19,383,810.22	$91,383.50
Drainage	$53,319,160.55	$53,319,160.55	$251,369.12
Planning	$2,335,040.00	$2,335,040.00	$11,008.37
TOTAL	**$241,382,649.11**	**$170,317,638.41**	**$802,949.52**

SUMMARY - BREAKDOWN OF DEVELOPMENT INFRASTRUCTURE LEVY

PROJECTS	TOTAL COST OF PROJECTS	TOTAL COST OF PROJECTS ALLOCATED TO MCA	CONTRIBUTION PER NDA
Land	$48,050,264.14	$47,011,766.44	$221,633.39
Construction	$193,332,384.97	$123,305,871.96	$581,316.13
TOTAL	**$241,382,649.11**	**$170,317,638.41**	**$802,949.52**

SUMMARY - COMMUNITY INFRASTRUCTURE LEVY

PROJECTS	TOTAL COST OF PROJECTS	TOTAL COST OF PROJECTS ALLOCATED TO MCA	ESTIMATED TOTAL CONTRIBUTION
Total (Capped at $1,530)	$9,845,866.85	4,242	$6,490,719.00

INTRODUCTION

2.0	Introduction	9
2.1	Report structure	9
2.2	Strategic basis	10
2.3	Planning and Environment Act 1987	10
2.4	Creamery Road Precinct Structure Plan	12
2.5	The area to which the development contributions plan applies	12

2

2.0 INTRODUCTION

The Creamery Road Development Contributions Plan (DCP) has been prepared by the City of Greater Geelong with the assistance of government agencies, service authorities, technical agencies and major stakeholders.

The DCP:

- Outlines projects required to ensure that future residents, visitors and workers in the precinct can be provided with timely access to infrastructure and services;
- Establishes a framework for development proponents to make a financial contribution towards the cost of identified infrastructure projects;
- Ensures the cost of providing new infrastructure and services is shared equitably between various development proponents and the wider community;
- Provides the details of the calculation of financial contributions that must be made by future developments towards the nominated projects; and
- Provides developers, investors and the local community with certainty about development contribution requirements and how these will be administered.

2.1 REPORT STRUCTURE

The DCP document comprises five parts:

1	STRATEGIC BASIS	**Clearly explains the strategic basis for the DCP.**
2	JUSTIFICATION	**Provides justification for the various infrastructure projects included in the DCP.**
3	CALCULATION OF CONTRIBUTIONS	**Sets out how the development contributions are calculated and cost apportioned.**
4	ADMINISTRATION	**Focuses on administration of the DCP.**
5	IMPLEMENTATION	**Focuses on implementation of the DCP.**

2.2 STRATEGIC BASIS

The DCP has been prepared in conjunction with the Creamery Road Precinct Structure Plan ('the PSP').

The strategic basis for the DCP is informed by:

- State and Local Planning Policy Framework as set out in the Greater Geelong Planning Scheme.
- Precinct Structure Planning 2.0 Guidelines (Victoria Planning Authority, 2021).
- Infrastructure Design Manual (Local Government Infrastructure Design Association).
- Northern and Western Geelong Growth Areas (NWGGA) Framework Plan - August 2020.
- Creamery Road Precinct Structure Plan and supporting technical documents.
- Northern and Western Geelong Growth Areas Standing Advisory Committee Referral 1: Creamery Road Precinct Structure Plan Report - Volume 1 (21 May 2025) and Volume 2 (20 June 2025).
- Minister for Planning – Direction to Council re: Northern and Western Geelong Growth Areas Standing Advisory Committee Referral 1 Report Volume 2 (November 2025).
- Northern and Western Geelong Growth Area Standing Advisory Committee Referral 2 Report Volumes 1 & 2 (1 July 2026).

These documents set out a broad, long-term vision for the sustainable development of the precinct and its surrounds, and the estimated costs of infrastructure proposed to be funded under this DCP. Further commentary on project rationale and justification for inclusion within the DCP is detailed in section 3.

2.3 PLANNING AND ENVIRONMENT ACT 1987

The DCP has been prepared in accordance with Part 3B of the *Planning and Environment Act 1987* (the Act) and has been developed in line with the State and Local Planning Policy Framework of the Greater Geelong Planning Scheme.

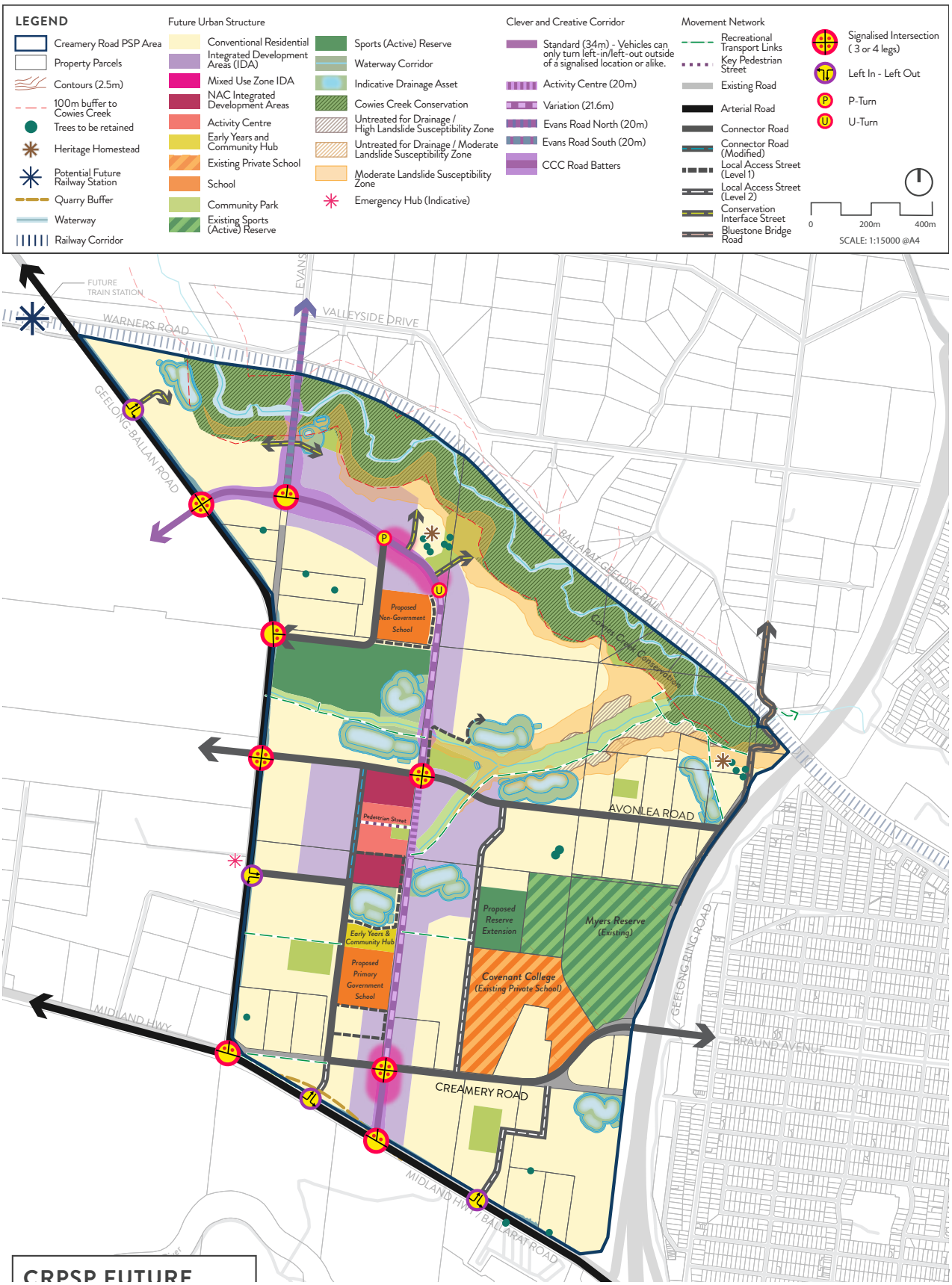
It is consistent with the Ministerial Direction on development contributions plans made under section 46M(1) of the Act and has had regard to the Victorian Government's Development Contributions Plan Guidelines (Amended 2007).

The DCP provides for the charging of a Development Infrastructure Levy ('DIL') pursuant to section 46J(a) of the Act towards works, services and facilities. It also provides for the charging of a Community Infrastructure Levy ('CIL') pursuant to section 46J(b) of the Act as some infrastructure projects funded by the DCP are classified as community infrastructure.

The DCP forms part of the Greater Geelong Planning Scheme pursuant to section 46I of the Act and is an incorporated document under the Schedule to Clause 72.04 of the Greater Geelong Planning Scheme.

The DCP is implemented through Schedule 11 to Clause 45.06 Development Contributions Plan Overlay (DCPO11) of the Greater Geelong Planning Scheme which applies to the Main Catchment Area ('MCA') illustrated on Plan 2.

P1. PLACE BASED PLAN FOR CREAMERY ROAD PRECINCT



2.4 CREAMERY ROAD PRECINCT STRUCTURE PLAN

Geelong has been experiencing and planning for urban growth for many years. The Greater Geelong Settlement Strategy (August 2020) describes the long-term population growth forecasts and sets a strategic direction for where new houses for this increased population will be most appropriately delivered. The Northern and Western Framework Plan (2020) gave further direction to the future growth areas of Geelong and this direction was reviewed and further refined through the preparation of the Creamery Road PSP ('the PSP').

The PSP identifies approximately 212.115 hectares of land for urban development as illustrated on Plan 1. The PSP sets out the vision for how land should be developed, describes the objectives to be achieved by the future development and outlines projects required to support the future community. The need for the infrastructure set out in the DCP has been determined according to the anticipated development scenario as described in the PSP.

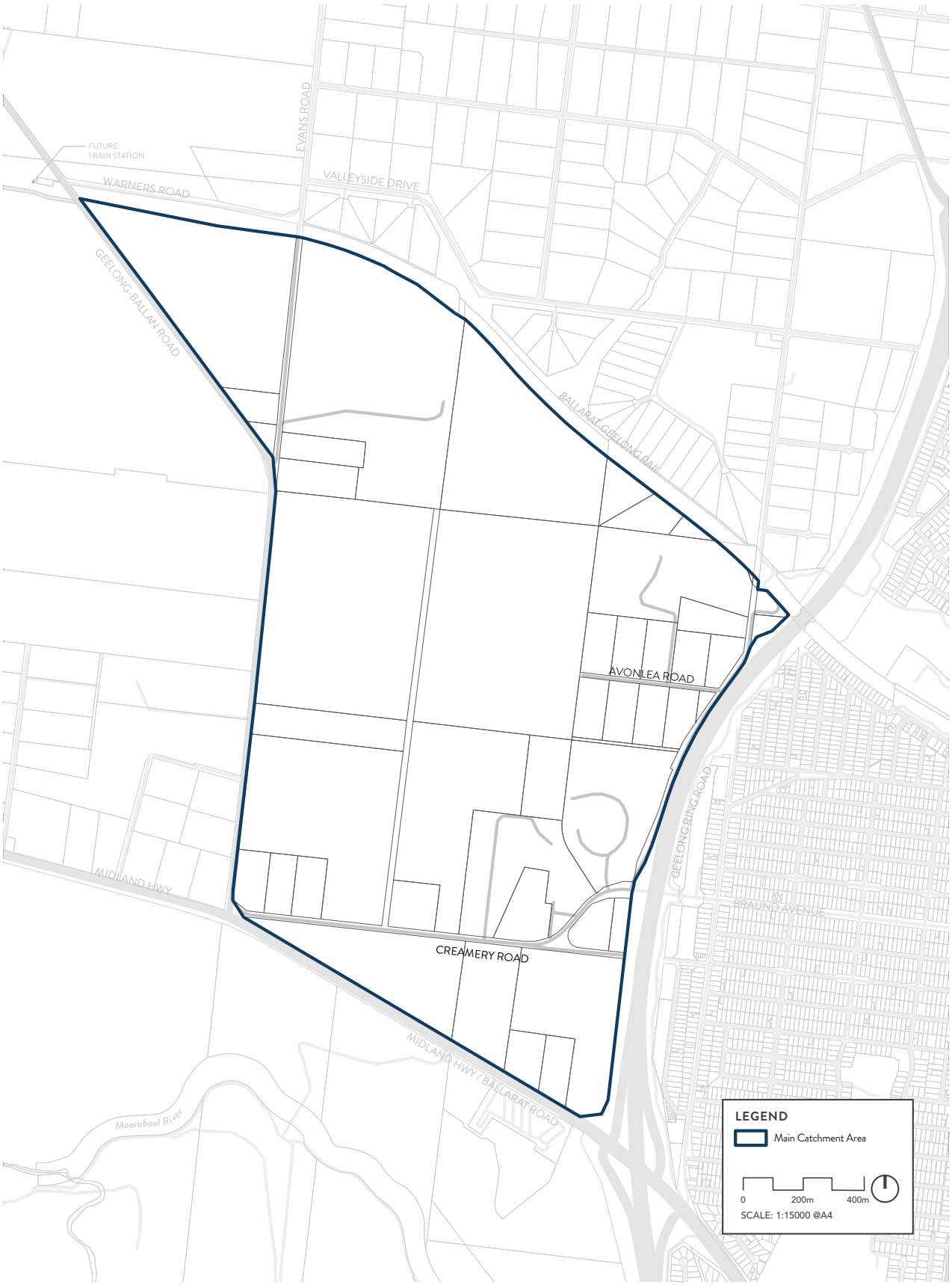
The DCP has a strong relationship to the PSP, as the PSP provides the rationale and justification for infrastructure items that have been included within the DCP. Accordingly, the DCP is an implementation-based planning tool which identifies the infrastructure items required by the new community and apportions the cost of this infrastructure in an equitable manner across the precinct. The PSP has been developed following a comprehensive planning process which establishes the future direction of development within the precinct.

2.5 THE AREA TO WHICH THE DEVELOPMENT CONTRIBUTIONS PLAN APPLIES

In accordance with section 46K(1)(a) of the Act, the DCP applies to land illustrated on Plan 2; this area is known as the main catchment area ('MCA') or DCP area. The area shall be identified as DCPO11 in the Greater Geelong Planning Scheme.

The DCP applies to 212.115 hectares net developable area of land.

P2. MAIN CATCHMENT AREA



INFRASTRUCTURE PROJECT JUSTIFICATION

3.0	Infrastructure project justification	15
3.1	Items not included in the development contributions plan (developer works)	16
3.2	Community infrastructure vs development infrastructure	16
3.3	Project identification	17
3.4	Project timing	18
3.5	Transport projects	18
3.6	Drainage projects	22
3.7	Open space projects	25
3.8	Community projects	27

3

3.0 INFRASTRUCTURE PROJECT JUSTIFICATION

The Regional DCP Toolkit – *Development Contributions Information Manual (2020)* prepared by the Victorian Planning Authority defines the underlying principles of the DCP system as need, nexus, transparency and accountability. In practice, this means that:

1. Items can be included in a DCP if the proposed development of an area is likely to create the need for infrastructure by its future community. New development does not have to trigger the need for new items in its own right, and furthermore, an item can be included in a DCP regardless of whether it is within or outside the DCP area.
2. Items are assessed to ensure they have a relationship or nexus to the proposed development in the PSP. The cost apportionment methodology adopted in the DCP relies on the nexus principle. A new development is deemed to have a nexus with an item if it is expected to make use of that item.
3. Items (and their apportionment) included in the DCP have been determined on the basis of the development scenario as described in the PSP; the PSP supporting technical documents provide transparency on links to need, nexus and cost.

In addition, project justification for items in the DCP have been assessed against the following characteristics identified in the *Development Contributions Guidelines (2007)*:

- Are essential to the health, safety and wellbeing of the community.
- Will be used by a broad cross-section of the community.
- Reflect the vision and strategic aspirations expressed in the PSP.
- Are not recurrent items.
- Are the basis for the future development of an integrated network.

The Northern and Western Geelong Growth Areas Standing Advisory Committee Referral 1: Creamery Road Precinct Structure Plan Report - Volume 1 (May 2025) requires the DCP to outline explanation of how DCP items are assessed as "essential to the health, safety and wellbeing of the community." Summary commentary is provided for each asset class in Sections 3.5, 3.6, 3.7 and 3.8.

3.1 ITEMS NOT INCLUDED IN THE DEVELOPMENT CONTRIBUTIONS PLAN (DEVELOPER WORKS)

Any items required for the development of the PSP that are not specifically funded through the DCP must be delivered as developer works. These works must be provided by developers as a part of the development of land pursuant to planning permits and/or pursuant to agreements with servicing agencies in implementing the PSP.

Developer works not funded by the DCP include:

- Connector streets and local streets (except where nominated in the DCP).
- Intersection works and traffic management measures along arterial roads, connector streets and local streets (except where nominated in the DCP).
- Local bus stop infrastructure.
- Landscaping of all existing and future roads and local streets.
- Local shared, pedestrian and bicycle paths along local streets, connector streets, utilities easements, waterways and within local parks including bridges, intersections, and barrier crossing points (except those where nominated in the DCP).
- All works required to deliver community parks including earthworks, landscaping, paths, play spaces, park furniture, lighting, planting, and associated infrastructure, unless otherwise specified in the DCP.
- Bicycle parking.
- Appropriately scaled lighting along all roads, major shared and pedestrian paths, and traversing the open space network.
- Local street or path crossings of waterways, unless included in the DCP or outlined as the responsibility of an agency in the PSP.
- Infrastructure as required by utility services providers, including water, sewerage, electricity, gas and telecommunications.

The items listed above are considered to be normal to the construction of a development and are not considered to warrant cost sharing arrangements beyond those set out in the DCP.

They may be further addressed and defined by an agreement under Section 173 of the Act and/or conditions in planning permits.

Upgrade of the existing adjoining road network to an urban standard will be implemented through subdivision permit conditions to the satisfaction of the responsible authority, except where specified as a DCP project.

3.2 COMMUNITY INFRASTRUCTURE VS. DEVELOPMENT INFRASTRUCTURE

In accordance with the Act and the *Ministerial Direction on the Preparation and Content of Development Contributions Plans and Ministerial Reporting Requirements for Development Contributions Plans (April 2015)*, the DCP makes a distinction between 'development' and 'community' infrastructure. This distinction is imperative due to the type of levy applicable to the infrastructure item, which has relationship to the payment (time and responsibility) of the contribution.

The Community Infrastructure Levy ('CIL') is payable prior to the grant of a building approval (unless an alternative time is agreed between the City and a development proponent) and will be paid at a 'per-dwelling' rate.

The Act currently stipulates that the amount that may be contributed under a CIL is no more than $1,530 per dwelling for the 2025-2026 financial year. The Governor in Council may from time to time by Order published in the Government Gazette vary the maximum amount that may be imposed as the CIL.

If in the future the CIL is amended, then the levy applicable to the release of the remaining dwellings may be adjusted in accordance with the revised legislative and regulatory approach as directed by the Minister for Planning.

All other infrastructure projects are classified as development infrastructure projects, where contributions are collected under the Development Infrastructure Levy ('DIL') and payable by developers at the time of subdivision. If subdivision is not applicable, payments must be made prior to construction of buildings and works.

3.3 PROJECT IDENTIFICATION

The DCP uses a project identification system of project category and sequential number in its tables and plans.

The following types of project categories are included in the DCP:

INFRASTRUCTURE			
CATEGORY	**TYPE**	**CODE**	**LEVY**
Transport	Roads and culverts	RD	DIL
	Intersections	IN	DIL
	Shared user paths and trails	TR	DIL
	Bridges	BR	DIL
Open Space	Active open space – sports reserve	OS	DIL
	Sports reserve pavilion	OS	CIL
Community	Community facilities	CF	CIL
Drainage	Constructed waterway works	DR	DIL
	Ephemeral waterway works	DR	DIL
	Wetland and retarding basin	DR	DIL
	Gross pollutant traps	DR	DIL
Land	Land	L	DIL

3.4 PROJECT TIMING

Each item in the DCP has an assumed indicative provision trigger specified in Tables 2–5. The timing of the provision and the items in the DCP are consistent with information available at the time the DCP was prepared.

The City is the Development Agency as well as the Collecting Agency and will monitor and assess the required timing for individual items and have regard to its capital works program.

The Collecting Agency may consider alternatives to the priority delivery of works or land where:

- Infrastructure is to be constructed / provided by development proponents as works or land in kind, as agreed by the Collecting Agency;
- Network priorities require the delivery of works or land to facilitate broader road network connections; and
- Community needs determine the delivery of works or land for open space and associated facilities.

All items in the DCP will be provided as soon as is practicable and as soon as sufficient contributions are available, consistent with Section 4 and acknowledging the Development Agency's capacities to provide the balance of funds not recovered by the DCP.

Contributions are to be made by developers at the time of subdivision. If subdivision is not applicable payments must be made prior to construction of buildings and works (refer to section 5.1).

3.5 TRANSPORT PROJECTS

The PSP outlines an expanded urban structure intended to support the future residential growth of the precinct, including connector streets, and local streets on a grid adjusted to meet the existing constraints of the area. Where the precinct requires a new or upgraded intersection on the periphery of the Creamery Road Precinct, the costs associated with the intersection have been included in the DCP and apportioned accordingly.

The Select Link Analysis (Stantec, March 2023) identifies Creamery Road use apportionment to the future Batesford South PSP Bridge project which is included in this DCP.

Shared user paths that serve the broader movement and access network in the Creamery Road precinct are included in the DCP where they are associated with other DCP infrastructure items (specifically, linear open spaces and drainage items). A pedestrian bridge is also included in the DCP to promote safe active travel over Geelong Ring Road.

The transport projects identified in the DCP also include:

- Signals only for primary intersections along the Clever and Creative Boulevard (CCB).
- Provision of land allocation to facilitate road widening projects on Midland Highway and Geelong-Ballan Road.
- Apportionment to the future Batesford South PSP bridge and Bluestone Bridge Road underpass projects.

These projects are described in *Table 2* and shown in Plan 3. Projects are considered essential to the health, safety and wellbeing of the community as they:

- Support safe transit on key corridors with increased traffic volumes; without appropriate intersection and road upgrades there is increased high risk of traffic incidents.
- Enable and encourage active transport movements which provides significant health and wellbeing opportunity for future residents.
- Enable and encourage use of public transport; reduces car dependence and volumes to improve safety on the road network, provides for future residents who do not have private car ownership.

T2. TRANSPORT DCP PROJECTS AND LAND

DCP PROJECT ID	PROJECT DESCRIPTION	INDICATIVE PROVISION TRIGGER	STRATEGIC JUSTIFICATION
DI_BR_01	DELIVERY of Batesford South PSP bridge (arterial road - Lynnburn Road over Moorabool River) - interim bridge for arterial road extension of Lynnburn Road over Moorabool River (BR-01)	To be determined by the Batesford South PSP (when developed).	CRPSP Review of NWGGA Bridges Report (Stantec, July 2024)
DI_BR_02	DELIVERY of Bluestone Bridge Road underpass upgrade and shared path connection -install traffic signals to allow one way movements and shared path (recreational transport link) connection	Concurrent to the completion of conservation works in the Cowies Creek Worneenanyook Masterplan Area delineated by properties 14 and 22 in the Creamery Road Place Based Plan.	Bluestone Bridge Road Options Assessment Report (GHD, April 2023)
DI_BR_04	DELIVERY of Creamery Road Pedestrian Bridge over Geelong Ring Road - active travel upgrade to existing bridge on Creamery Road over the Geelong Ring Road (BR-04)	30% of dwellings in Creamery Road Precinct constructed.	CRPSP Review of NWGGA Bridges Report (Stantec, July 2024)
DI_IN_01	DELIVERY of intersection Geelong - Ballan Road and North-South CCC (IN-01)	The first subdivision requiring the intersection delivery.	CRPSP Concept Designs and Opinion of Probable Costs Report (Stantec, May 2024), including appendices.
DI_IN_03	DELIVERY of intersection Geelong - Ballan Road and East-West Connector Road (IN-03)	The first subdivision requiring the intersection delivery.	CRPSP Concept Designs and Opinion of Probable Costs Report (Stantec, May 2024), including appendices.
DI_IN_04	DELIVERY of intersection Geelong - Ballan Road and East-West Connector Road (IN-04)	The first subdivision requiring the intersection delivery.	CRPSP Concept Designs and Opinion of Probable Costs Report (Stantec, May 2024), including appendices.
DI_IN_05	DELIVERY of intersection Geelong - Ballan Road and Midland Hwy (IN-05)	50% of dwellings in Creamery Road Precinct constructed.	CRPSP Concept Designs and Opinion of Probable Costs Report (Stantec, May 2024), including appendices. NWGGA Standing Advisory Committee Referral 1 Report Vol. 2 (June 2025) and Letter from Minister for Planning – Direction to Council re: NNWGGA Standing Advisory Committee Referral 1 Report Vol. 2 (November 2025)

DCP PROJECT ID	PROJECT DESCRIPTION	INDICATIVE PROVISION TRIGGER	STRATEGIC JUSTIFICATION
DI_IN_05_L	LAND for intersection Geelong-Ballan Road and Midland Hwy	The first subdivision requiring the associated road section.	CRPSP Concept Designs and Opinion of Probable Costs Report (Stantec, May 2024), including appendices. NWGGA Standing Advisory Committee Referral 1 Report Vol. 2 (June 2025) and Letter from Minister for Planning – Direction to Council re: NNWGGA Standing Advisory Committee Referral 1 Report Vol. 2 (November 2025)
DI_IN_06	DELIVERY of intersection North-South CCB and Midland Hwy (IN-06)	The first subdivision requiring the intersection delivery.	CRPSP Concept Designs and Opinion of Probable Costs Report (Stantec, May 2024), including appendices.
DI_IN_07	DELIVERY of intersection North-South CCB and Key Local Road - SIGNALS ONLY (IN-07)	The first subdivision requiring the intersection delivery.	CRPSP Concept Designs and Opinion of Probable Costs Report (Stantec, May 2024), including appendices.
DI_IN_09	DELIVERY of intersection North-South CCB and Connector Road - SIGNALS ONLY (IN-09)	The first subdivision requiring the intersection delivery.	CRPSP Concept Designs and Opinion of Probable Costs Report (Stantec, May 2024), including appendices.
DI_IN_12	DELIVERY of intersection North-South CCC and Evans Road - SIGNALS ONLY (IN-12)	The first subdivision requiring the intersection delivery.	CRPSP Concept Designs and Opinion of Probable Costs Report (Stantec, May 2024), including appendices.
DI_RD_01	DELIVERY of culvert and roadworks - Cowies Creek under Evans Road (CU-02)	Concurrent with the construction of Evans Road.	CRPSP Concept Designs and Opinion of Probable Costs Report (Stantec, May 2024), including appendices.
DI_RD_02_L	LAND for Geelong-Ballan Road widening (LA-02)	The first subdivision requiring the associated road section.	CRPSP Concept Designs and Opinion of Probable Costs Report (Stantec, May 2024), including appendices. NWGGA Standing Advisory Committee Referral 1 Report Vol. 2 (June 2025) and Letter from Minister for Planning – Direction to Council re: NNWGGA Standing Advisory Committee Referral 1 Report Vol. 2 (November 2025)
DI_RD_03_L	LAND for Midland Road widening (LA-03)	The first subdivision requiring the associated road section.	Stantec CRPSP Transport Concept Designs and OPC Report (May 2024), CRPSP SIDRA Modelling Report (April 2024), Northern & Western Geelong Growth Areas SAC Referral 1 - Volume 2 Report (June 2025), – Minister for Planning – Direction to Council re: Northern and Western Geelong Growth Areas Standing Advisory Committee Referral 1 Report Volume 2 (November 2025).
DI_TR_01	DELIVERY of shared path along DI_DR_10 reserve (WW-01-SP)	Concurrent with construction of DI_DR_10.	PMP Urbanists Creamery Road Movement and Place Classification Final Report (July 2024)
DI_TR_02	DELIVERY of shared path along boundary of DI_DR_01 (WW-02-SP)	Concurrent with construction of DI_DR_01.	PMP Urbanists Creamery Road Movement and Place Classification Final Report (July 2024)

P3. TRANSPORT DCP PROJECTS AND LAND

3.6 DRAINAGE PROJECTS

The DCP includes funding for the construction and land of drainage infrastructure deemed necessary to appropriately retard and treat stormwater flows from new urban development, in accordance with the best practice principles to the satisfaction of the Responsible Authority and the Corangamite Catchment Management Authority.

In summary the drainage projects include:

- Land for and construction of wetlands, sediment basins and waterways (does not include land that is already encumbered).
- Channel works.
- Piped drains and gross pollutant traps.

These projects are described in Table 3 and shown in Plan 4. Projects are considered essential to the health, safety and wellbeing of the community as they:

- Play a fundamental role in reducing future flood opportunity and impact to the new residents of the Precinct.
- Provide amenity to the urban development to support use of the shared path network and local open spaces, encouraging physical activity to improve wellbeing.

T3. DRAINAGE DCP PROJECTS AND LAND

DCP PROJECT ID	PROJECT DESCRIPTION	INDICATIVE PROVISION TRIGGER	STRATEGIC JUSTIFICATION
DI_DR_01	DELIVERY of Wetland Retarding Basin No.1 (WLRB-01)	Short term. Outfall into DI_DR_12 and Cowies Creek Conservation Area must be completed first.	Creamery Road PSP Development Services Scheme: Addendum to Function Design Report (Alluvium June 2024) Creamery Road PSP Revised Drainage Strategy Report - Peer Review (Water Technology, October 2025)
DI_DR_01_L	LAND for Wetland Retarding Basin No.1	Short term. Can be provided with first sub-division.	Creamery Road PSP Development Services Scheme: Addendum to Function Design Report (Alluvium June 2024) Creamery Road PSP Revised Drainage Strategy Report - Peer Review (Water Technology, October 2025)
DI_DR_02	DELIVERY of Wetland Retarding Basin No.2 (WLRB-02)	Short term. Must be functioning before contributing sub-catchments and upstream catchment can develop and after DI_DR_01 is functioning.	Creamery Road PSP Development Services Scheme: Addendum to Function Design Report (Alluvium June 2024) Creamery Road PSP Revised Drainage Strategy Report - Peer Review (Water Technology, October 2025)
DI_DR_02_L	LAND for Wetland Retarding Basin No.2	Short term. Can be provided with first sub-division.	Creamery Road PSP Development Services Scheme: Addendum to Function Design Report (Alluvium June 2024) Creamery Road PSP Revised Drainage Strategy Report - Peer Review (Water Technology, October 2025)
DI_DR_05	DELIVERY of Wetland Retarding Basin No.5 (WLRB-05)	Short term. Must be functioning before contributing sub-catchments can develop and after DI_DR_01 and DI_DR_11 is functioning.	Creamery Road PSP Development Services Scheme: Addendum to Function Design Report (Alluvium June 2024) Creamery Road PSP Revised Drainage Strategy Report - Peer Review (Water Technology, October 2025)
DI_DR_05_L	LAND for Wetland Retarding Basin No.5	Short term. Can be provided with first sub-division.	Creamery Road PSP Development Services Scheme: Addendum to Function Design Report (Alluvium June 2024) Creamery Road PSP Revised Drainage Strategy Report - Peer Review (Water Technology, October 2025)
DI_DR_06	DELIVERY of Wetland Retarding Basin No.6 (WLRB-06)	Short term. Must be functioning before contributing sub-catchments can develop and after outfall is functioning.	Creamery Road PSP Development Services Scheme: Addendum to Function Design Report (Alluvium June 2024) Creamery Road PSP Revised Drainage Strategy Report - Peer Review (Water Technology, October 2025)

DCP PROJECT ID	PROJECT DESCRIPTION	INDICATIVE PROVISION TRIGGER	STRATEGIC JUSTIFICATION
DI_DR_06_L	LAND for Wetland Retarding Basin No.6	Short term. Can be provided with first sub-division.	Creamery Road PSP Development Services Scheme: Addendum to Function Design Report (Alluvium June 2024) Creamery Road PSP Revised Drainage Strategy Report - Peer Review (Water Technology, October 2025)
DI_DR_06a	DELIVERY for Sediment Retarding Basin No.6a	Short term. Can be provided with first sub-division.	Memo - WLRB6 Sizing and Levels (N. Craigie, 10 May 2026) Memo - Draft Greater Geelong Planning Scheme Amendment C450ggee (Creamery Road Precinct Structure Plan) Proposed Alternative WLRB6 Design – Drainage Opinion (Watertech, 22 May 2026)
DI_DR_06a_L	LAND for Sediment Retarding Basin No.6a	Short term. Can be provided with first sub-division.	Memo - WLRB6 Sizing and Levels (N. Craigie, 10 May 2026) Memo - Draft Greater Geelong Planning Scheme Amendment C450ggee (Creamery Road Precinct Structure Plan) Proposed Alternative WLRB6 Design – Drainage Opinion (Watertech, 22 May 2026)
DI_DR_07	DELIVERY of Wetland Retarding Basin No.7 (WLRB-07)	Short term. Must be functioning before contributing sub-catchments can develop and after outfall to Cowies Creek through conservation area is functioning.	Creamery Road PSP Development Services Scheme: Addendum to Function Design Report (Alluvium June 2024) Creamery Road PSP Revised Drainage Strategy Report - Peer Review (Water Technology, October 2025)
DI_DR_07_L	LAND for Wetland Retarding Basin No.7	Short term. Can be provided with first sub-division.	Creamery Road PSP Development Services Scheme: Addendum to Function Design Report (Alluvium June 2024) Creamery Road PSP Revised Drainage Strategy Report - Peer Review (Water Technology, October 2025)
DI_DR_08	DELIVERY of Wetland Retarding Basin No.8 (WLRB-08)	Short term. Must be provided before the contributing sub-catchment can develop and after conservation zone works and outfall to Cowies Creek is established.	Creamery Road PSP Development Services Scheme: Addendum to Function Design Report (Alluvium June 2024) Creamery Road PSP Revised Drainage Strategy Report - Peer Review (Water Technology, October 2025)
DI_DR_09	DELIVERY of Wetland Retarding Basin No.9, Sediment Basin and Bioretention Basin WLRB-09/SRB-09)	Short term. Must be provided before the contributing sub-catchment can develop and after conservation zone works and outfall to Cowies Creek is established.	Creamery Road PSP Development Services Scheme: Addendum to Function Design Report (Alluvium June 2024) Creamery Road PSP Revised Drainage Strategy Report - Peer Review (Water Technology, October 2025)
DI_DR_09_L	LAND for Wetland Retarding Basin No.9	Short term. Can be provided with first sub-division.	Creamery Road PSP Development Services Scheme: Addendum to Function Design Report (Alluvium June 2024) Creamery Road PSP Revised Drainage Strategy Report - Peer Review (Water Technology, October 2025)
DI_DR_10	DELIVERY of Waterway No.1 (WW-01)	Short term. Must be provided with DI_DR_02 sub-catchments and before upstream catchment can develop.	Creamery Road PSP Revised Drainage Strategy Report - Peer Review (Water Technology, October 2025)
DI_DR_11	DELIVERY of Waterway No.2 (WW-02)	Short term. Must be provided before DI_DR_05 sub-catchment can develop and after DI_DR_01 is functioning.	Creamery Road PSP Revised Drainage Strategy Report - Peer Review (Water Technology, October 2025)
DI_DR_12	DELIVERY of Ephemeral Waterway (EW-01)	Short term. Must be provided before upstream catchment can develop and after conservation zone works and outfall to Cowies Creek is established.	Creamery Road PSP Development Services Scheme: Addendum to Function Design Report (Alluvium June 2024)
DI_DR_13	DELIVERY of Gross Pollutant Trap 1 (GPT-01)	Long term. Water quality objectives met through delivery of all other WLRBs in precinct.	Creamery Road PSP Development Services Scheme: Addendum to Function Design Report (Alluvium June 2024)

P4. DRAINAGE DCP PROJECTS AND LAND

3.7 OPEN SPACE PROJECTS

The works and land associated with two active open space reserves are included in the DCP, as determined by provision analysis.

The land associated with the local parks will not be included in the DCP, instead the open space land requirements will be included within Schedule 1 of 53.01 of the Greater Geelong Planning Scheme and subject to equalisation within the Creamery Road PSP.

The open space projects funded by the DCP described in Table 4 and are shown on Plan 5. Projects are considered essential to the health, safety and wellbeing of the community as they enable and encourage participation in physical activity and volunteerism in community clubs, both which have significant positive impact on health and wellbeing.

T4. OPEN SPACE DCP PROJECTS AND LAND

DCP PROJECT ID	PROJECT DESCRIPTION	INDICATIVE PROVISION TRIGGER	STRATEGIC JUSTIFICATION
DI_OS_01	DELIVERY of Myers Reserve Extension (SR-01)	Prior to 40 per cent of dwellings delivered in Creamery Road Precinct, or as required according to demand levels and subject to DCP funding.	NWGGA Social Infrastructure Report (TAP Consulting, November 2018) NWGGA Social Infrastructure and Open Space DCP Costings and Peer Review (HillPDA, June 2024) Creamery Road PSP Open Space Network Report (CoGG, October 2025) and Peer Review: CRPSP Open Space Network (SGS, September 2025)
DI_OS_01_L	LAND for Myers Reserve Extension (SR-01-LA-P31)	At time of subdivision, as required according to demand levels and subject to DCP funding.	NWGGA Social Infrastructure Report (TAP Consulting, November 2018) NWGGA Social Infrastructure and Open Space DCP Costings and Peer Review (HillPDA, June 2024) Creamery Road PSP Open Space Network Report (CoGG, October 2025) and Peer Review: CRPSP Open Space Network (SGS, September 2025)
DI_OS_02	DELIVERY of Northern Sports Reserve (SR-02)	Prior to 60 per cent of dwellings delivered in Creamery Road Precinct, or as required according to demand levels and subject to DCP funding.	NWGGA Social Infrastructure Report (TAP Consulting, November 2018) NWGGA Social Infrastructure and Open Space DCP Costings and Peer Review (HillPDA, June 2024) Creamery Road PSP Open Space Network Report (CoGG, October 2025) and Peer Review: CRPSP Open Space Network (SGS, September 2025)
DI_OS_02_L	LAND for Northern Sports Reserve (SR-02-LA-P12)	At time of subdivision, as required according to demand levels and subject to DCP funding.	NWGGA Social Infrastructure Report (TAP Consulting, November 2018) NWGGA Social Infrastructure and Open Space DCP Costings and Peer Review (HillPDA, June 2024) Creamery Road PSP Open Space Network Report (CoGG, October 2025) and Peer Review: CRPSP Open Space Network (SGS, September 2025)

P5. OPEN SPACE DCP PROJECTS AND LAND

3.8 COMMUNITY PROJECTS

The works and land associated with one Early Years and Community Hub is included in the DCP, as determined by provision analysis.

The DCP also includes CIL contributions towards delivery of a sports pavilion to service future users of the Northern Active Open Space Reserve and the McCanns Lane Cultural Hub.

The community projects funded by the DCP are described in Table 5 and shown on Plan 6. Projects are considered essential to the health, safety and wellbeing of the community as they:

- Provide services such as maternal and child health, early years education and library, whereby local access for future young families is considered essential to promote healthy growth and development.
- Provide access to supporting amenities required when participating in structured physical activity; assists to enable and encourage participation.

T5. COMMUNITY DCP PROJECTS AND LAND

DCP PROJECT ID	PROJECT DESCRIPTION	INDICATIVE PROVISION TRIGGER	STRATEGIC JUSTIFICATION
DI_CF_01	DELIVERY of Creamery Road Early Years and Community Hub (CF-01)	Prior to 30 per cent of dwellings delivered in Creamery Road Precinct, or as required according to demand levels and subject to DCP funding.	NWGGA Social Infrastructure Report (TAP Consulting, November 2018) NWGGA Social Infrastructure and Open Space DCP Costings and Peer Review (HillPDA, June 2024)
DI_CF_01_L	LAND for Creamery Road Early Years and Community Hub	At time of subdivision, as required according to demand levels and subject to DCP funding.	NWGGA Social Infrastructure Report (TAP Consulting, November 2018) NWGGA Social Infrastructure and Open Space DCP Costings and Peer Review (HillPDA, June 2024)
CI_CF_ML_01	DELIVERY of McCanns Lane Cultural Hub incl Library and Museum (CF-ML-01)	Prior to 80 per cent of dwellings delivered in Western Geelong Growth Area, or as required according to demand levels and subject to DCP funding.	NWGGA Social Infrastructure Report (TAP Consulting, November 2018) NWGGA Social Infrastructure and Open Space DCP Costings and Peer Review (HillPDA, June 2024)

P6. COMMUNITY DCP PROJECTS AND LAND

KEEPING
YOUR DISTANCE.
CHECK-IN
NOW

CALCULATION OF CONTRIBUTIONS

4.0 Calculation of Contributions 30

4.1 Calculation of net developable area and demand units 31

4.1.1 Net developable area (NDA) 31

4.1.2 Land budget and demand units 33

4.2 Calculation of contribution changes 34

4.2.1 Calculation of project costs 34

4.2.2 Estimate of land value 35

4.2.3 DCP and PSP preparation 35

4.2.4 Main catchment area 35

4

4.1 CALCULATION OF NET DEVELOPABLE AREA, CHARGE AREAS AND DEMAND UNITS

The following section sets out how the net developable area (NDA) is calculated and outlines the development projections anticipated in the Precinct.

4.1.1 NET DEVELOPABLE AREA (NDA)

In the DCP, all development infrastructure contributions are payable on the NDA of land on any given development site. Calculations of NDA for each individual property is outlined in the property-specific land budget included at Appendix A.

For the purposes of the DCP the NDA is defined as the total amount of land within the precinct that is made available for development. It is the total precinct area minus community facilities, educational facilities, open space and encumbered land. NDA includes any land for lots, housing and employment buildings, all local streets (including some connector streets), and any small parks defined at subdivision stage that are in addition to those outlined in the PSP.

Table 6 identifies a summary land budget of the Creamery Road Precinct, which identifies a total of 212.115 hectares of NDA.

The contributions 'per net developable hectare' must not and will not be amended to responses to minor changes to the land budget that may result from the subdivision process. In other words, the DCP is permanently linked to the calculation of the NDA set out in Appendix A.

The NDA may only change if the collecting agency agrees to a variation to the summary land use budget (Table 6) and the detailed property-specific land budget (Appendix A) and associated tables.

If the NDA for any specific parcel ID as set out in Appendix A is increased as a result of changes to the PSP design and/or land use variation approved collecting agency – the responsible authority may require the land owner to make payment for the additional net developable area at the contributions 'per net developable hectare' applicable at the time of any permit application.

T6. SUMMARY LAND USE BUDGET

DESCRIPTION	HECTARES	% OF PRECINCT	% OF NDA
TOTAL PRECINCT AREA	**344.565**	**100%**	
TRANSPORT			
Existing Road Being Retained	11.245	3.26%	
Intersection Extent	3.791	1.10%	
Intersection Extent (DCP Land)	0.268	0.08%	
Road Widening (DCP Land)	1.741	0.51%	
SUBTOTAL TRANSPORT	**17.045**	**4.95%**	
COMMUNITY & EDUCATION			
Existing Non-Government School	11.611	3.37%	
Proposed Early Years and Community Hub (DCP Land)	3.500	1.02%	
Proposed Government School	1.000	0.29%	
SUB TOTAL COMMUNITY & EDUCATION	**16.111**	**4.68%**	
OPEN SPACE			
UNCREDITED (ENCUMBERED) OPEN SPACE			
Barwon Water Facilities	1.000	0.29%	
Cowies Creek Conservation Reserve	40.601	11.78%	
Drainage	5.848	2.76%	
Drainage (DCP Land)	15.546	7.33%	
Existing AOS (Myers Reserve)	17.316	5.03%	
Waterway	0.811	0.24%	
SUB TOTAL UNCREDITED OPEN SPACE	**81.124**	**23.54%**	
CREDITED OPEN SPACE			
Active Open Space (DCP Land)	11.891	3.45%	5.61%
Local Open Space	6.279	1.82%	2.96%
SUB TOTAL CREDITED OPEN SPACE	**18.170**	**5.27%**	**8.57%**

NET DEVELOPABLE AREA (NDA)	
NAC	4.000
Mixed Use Zone	5.796
Residential Growth Zone	4.485
Residential Growth Zone and Amenity area	62.325
General Residential Zone	102.256
General Residential Zone and Amenity area	28.298
Independent Drainage Solution to be Investigated - Indicative	4.955
TOTAL NET DEVELOPABLE AREA (NDA)	**212.115**

NOTE:

The summary land budget included in this table clearly sets out the NDA for the PSP. The NDA will not be amended to respond to minor changes to land budgets that may result from the subdivision process for any other reason than those stated above, unless the variation is agreed to by the collecting agency.

4.1.2 LAND BUDGET AND DEMAND UNITS

The 'net developable area' is the demand unit for the DCP.

Development is defined to include all forms of development, including residential subdivision, development within centres and employment areas. Development includes any non-residential uses within the charge area 1 such as place of worship, education centre, retirement village, nursing home, childcare centre, medical centre, convenience store or any other approved use.

A DIL is not charged on exempt development as determined by the *Ministerial Direction on the Preparation and Content of Development Contribution Plans and Ministerial Reporting Requirements for Development Contributions Plans (April 2025)* which specifies that a DCP must not impose a DIL or a CIL in respect of the development of land for:

- A non-government school; or
- Housing provided by or on behalf of the Chief Executive Officer of Homes Victoria; or
- A small second dwelling.

The DCP contains a total of 212.115 net developable hectares.

T7. DEMAND UNITS AND CHARGE AREA

CHARGE AREA	DEVELOPMENT INFRASTRUCTURE LEVY (HA)	COMMUNITY INFRASTRUCTURE LEVY (DWELLINGS)
Charge Area 1	212.115	4242
TOTAL	**212.115**	**4242**

4.2 CALCULATION OF CONTRIBUTIONS

4.2.1 CALCULATION OF PROJECT COSTS

Each infrastructure project has been assigned a land and/or construction cost, as listed in Table 8 and Table 9. Project costs have been determined by the list below. The costs are expressed in 2025 dollars and will be adjusted annually in accordance with the method specified in Section 5.2.

CHARGE AREA	DEVELOPMENT INFRASTRUCTURE LEVY (HA)
Transport	• NWGGA Bridge Review (Stantec, July 2024) • CRPSP Concept Design and Opinion of Probable Costs Report (Stantec, May 2024), including appendices. • CRPSP Bluestone Bridge Road Preferred Option Report (GHD, July 2023) • City of Greater Geelong Intersection Costings (October 2025) – in conjunction with Creo Consulting • Benchmark Infrastructure Costings (VPA, July 2025)
Open Space	• Myers Reserve Extension and Northern Sports Reserve Cost Plan (Zinc, September 2025) • Northern Sports Reserve Cost Plan (Zinc, October 2025)
Community	• NWGGA Social Infrastructure and Open Space Development Contributions Plan Peer Review and Costing (HillPDA, June 2024) • Revised Community Infrastructure Costings (City of Greater Geelong, September 2025)
Drainage	• Creamery Road PSP Development Services Scheme Addendum to Functional Design Report (Alluvium, June 2024) • Creamery Road PSP Revised Drainage Strategy Review (Water Technology, October 2025) • Memo - WLRB6 Sizing and Levels (N. Craigie, 10 May 2026) • Memo - Draft Greater Geelong Planning Scheme Amendment C450ggee (Creamery Road Precinct Structure Plan) Proposed Alternative WLRB6 Design Drainage Opinion (Watertech, 22 May 2026)
Planning	• Consultant fees incurred.
Land	• Creamery Road DCP Land Valuation Report (Urbis, November 2025).

4.2.2 ESTIMATE OF LAND VALUE

LAND INTERNAL TO THE DCP

The area of land to be acquired for each DCP project on each property was identified from the property specific land budget prepared for the PSP. A description of the land was provided to Urbis as a registered valuer to prepare an estimate of value.

A value for each infrastructure project comprising land is then included in the DCP. The estimates of value were prepared using the Public Land Equalisation Method (PLEM). The Public Land Equalisation Method calculates the average public land contribution required for the PSP (expressed as a percentage of NDA). The land required for each property is also calculated and compared against the average.

Public land contributions on a property that are less than or equal to the precinct average have an estimate of value using a per property broad hectare method. Any component of public land contributions that exceed the precinct average have an estimate of value using a site-specific method. For more information, refer to the Infrastructure Contributions Plan Guidelines October 2016 as published by the Department of Environment, Land, Water and Planning.

PER PROPERTY BROADHECTARE ESTIMATE OF VALUE

The per property broad hectare estimate of value prepared for each individual property assumes the unencumbered, highest and-best use as indicated by the PSP.

The estimates of value are prepared on a 'Before and After' basis where:

- The 'Before' assessment is based on the total developable area of each property and ignores the land and infrastructure items to be provided by the DCP. Any development that occurs subsequent to the approval of the DCP is ignored for the purpose of the valuation.
- The 'After' assessment comprises the remaining portion of each property after all land required by the DCP has been provided. Severance or enhancement, disturbance, special value etc. are ignored for the purpose of the 'after' valuation.

SITE SPECIFIC VALUE ESTIMATE

The site-specific approach prepares an estimate of value for each separate infrastructure item. For example, if a landowner has land identified for a road widening, a community centre and a local sports reserve, a site-specific estimate of value would be prepared for all three items separately.

Site specific estimates of value generally assume that the land identified can be sold as serviced development lots, i.e. street frontages etc have already been constructed, therefore the land has a lower expected development cost.

4.2.3 DCP AND PSP PREPARATION

In addition to the items described above, the costs incurred by the City in preparing the DCP and PSP have also been included as a project. Costs incurred include fees for the preparation of background documents, concept designs and cost estimates.

4.2.4 MAIN CATCHMENT AREA

The main catchment area is the geographic area from which a given item of infrastructure will draw most of its use. The DCP includes one main catchment area, which is the same as the precinct area and illustrated in Plan 2. It is important to note that the number of net developable hectares (that is the demand units) in the main catchment area is based on the land budgets in Table 6 and Appendix A.

T8. CALCULATION OF COSTS – DEVELOPMENT INFRASTRUCTURE LEVY (DIL)

Note: All figures underlined subject to finalisation.

PAGE TO BE UPDATED

TRANSPORT PROJECTS

DCP PROJECT ID	PROJECT DESCRIPTION	INFRASTRUCTURE TYPE	DELIVERY TYPE	LAND AREA	PROJECT COST	EXTERNAL APPORTION-MENT	PROJECT COST TO MCA	DEMAND UNITS	LEVY PER HA
DI_BR_01	DELIVERY of Batesford South PSP bridge (arterial road - Lynnburn Road over Moorabool River) - interim bridge for arterial road extension of Lynnburn Road over Moorabool River (BR-01)	Development	Construction		$49,514,484.35	88.04%	$5,921,932.33	212.115	$27,918.50
DI_BR_02	DELIVERY of Bluestone Bridge Road underpass upgrade and shared path connection -install traffic signals to allow one way movements and shared path (recreational transport link) connection	Development	Construction		$2,112,096.20	70.46%	$623,913.22	212.115	$2,941.39
DI_BR_04	DELIVERY of Creamery Road Pedestrian Bridge over Geelong Ring Road - active travel upgrade to existing bridge on Creamery Road over the Geelong Ring Road (BR-04)	Development	Construction		$2,087,687.00		$2,087,687.00	212.115	$9,842.24
DI_IN_01	DELIVERY of intersection Geelong - Ballan Road and North-South CCC (IN-01)	Development	Construction		$10,138,209.00	50.00%	$5,069,104.50	212.115	$23,897.91
DI_IN_03	DELIVERY of intersection Geelong - Ballan Road and East-West Connector Road (IN-03)	Development	Construction		$10,222,981.00	50.00%	$5,111,490.50	212.115	$24,097.73
DI_IN_04	DELIVERY of intersection Geelong - Ballan Road and East-West Connector Road (IN-04)	Development	Construction		$10,630,423.00	50.00%	$5,315,211.50	212.115	$25,058.16
DI_IN_05	DELIVERY of intersection Geelong - Ballan Road and Midland Hwy (IN-05)	Development	Construction		$14,802,543.00	50.00%	$7,401,271.50	212.115	$34,892.73
DI_IN_05_L	LAND for intersection Geelong-Ballan Road and Midland Hwy	Development	Land	0.346	$735,753.42		$735,753.42	212.115	$3,468.65
DI_IN_06	DELIVERY of intersection North-South CCB and Midland Hwy (IN-06)	Development	Construction		$11,516,566.00		$11,516,566.00	212.115	$54,293.97
DI_IN_07	DELIVERY of intersection North-South CCB and Key Local Road - SIGNALS ONLY (IN-07)	Development	Construction		$818,368.43		$818,368.43	212.115	$3,858.14
DI_IN_09	DELIVERY of intersection North-South CCB and Connector Road - SIGNALS ONLY (IN-09)	Development	Construction		$818,368.43		$818,368.43	212.115	$3,858.14
DI_IN_12	DELIVERY of intersection North-South CCC and Evans Road - SIGNALS ONLY (IN-12)	Development	Construction		$613,776.00		$613,776.00	212.115	$2,893.60
DI_RD_01	DELIVERY of culvert and roadworks - Cowies Creek under Evans Road (CU-02)	Development	Construction		$2,262,373.00		$2,262,373.00	212.115	$10,665.79
DI_RD_02_L	LAND for Geelong-Ballan Road widening (LA-02)	Development	Land	1.104	$2,076,995.40	50.00%	$1,038,497.70	212.115	$4,895.92
DI_RD_03_L	LAND for Midland Road widening (LA-03)	Development	Land	0.637	$1,205,397.88		$1,205,397.88	212.115	$5,682.76
DI_TR_01	DELIVERY of shared path along DI_DR_10 reserve (WW-01-SP)	Development	Construction		$167,224.46		$167,224.46	212.115	$788.37
DI_TR_02	DELIVERY of shared path along northern boundary of DI_DR_01 (WW-02-SP)	Development	Construction		$304,056.46		$304,056.46	212.115	$1,433.45
SUB-TOTAL TRANSPORT					**$120,027,303.03**		**$51,010,992.32**		**$240,487.44**

OPEN SPACE PROJECTS

DCP PROJECT ID	PROJECT DESCRIPTION	INFRASTRUCTURE TYPE	DELIVERY TYPE	LAND AREA	PROJECT COST	EXTERNAL APPORTION-MENT	PROJECT COST TO MCA	DEMAND UNITS	LEVY PER HA
DI_OS_01	DELIVERY of Myers Reserve Extension (SR-01)	Development	Construction		$6,829,000.00	30.00%	$4,780,300.00	212.115	$22,536.36
DI_OS_01_L	LAND for Myers Reserve Extension (SR-01-LA-P31)	Development	Land	3.250	$5,930,461.94		$5,930,461.94	212.115	$27,958.71
DI_OS_02	DELIVERY of Northern Sports Reserve (SR-02)	Development	Construction		$19,285,000.00		$19,285,000.00	212.115	$90,917.66
DI_OS_02_L	LAND for Northern Sports Reserve (SR-02-LA-P12)	Development	Land	8.641	$14,272,873.37		$14,272,873.37	212.115	$67,288.37
SUB-TOTAL OPEN SPACE					**$46,317,335.31**		**$44,268,635.31**		**$208,701.11**

DRAINAGE PROJECTS

Note: All figures underlined subject to finalisation.

PAGE TO BE UPDATED

DCP PROJECT ID	PROJECT DESCRIPTION	INFRASTRUCTURE TYPE	DELIVERY TYPE	LAND AREA	PROJECT COST	EXTERNAL APPORTION-MENT	PROJECT COST TO MCA	DEMAND UNITS	LEVY PER HA
DI_DR_01	DELIVERY of Wetland Retarding Basin No.1 (WLRB-01)	Development	Construction		$7,433,015.63		$7,433,015.63	212.115	$35,042.39
DI_DR_01_L	LAND for Wetland Retarding Basin No.1	Development	Land	3.133	$4,391,168.38		$4,391,168.38	212.115	$20,701.83
DI_DR_02	DELIVERY of Wetland Retarding Basin No.2 (WLRB-02)	Development	Construction		$4,486,529.25		$4,486,529.25	212.115	$21,151.40
DI_DR_02_L	LAND for Wetland Retarding Basin No.2	Development	Land	2.840	$4,536,644.84		$4,536,644.84	212.115	$21,387.67
DI_DR_05	DELIVERY of Wetland Retarding Basin No.5 (WLRB-05)	Development	Construction		$6,076,453.95		$6,076,453.95	212.115	$28,646.98
DI_DR_05_L	LAND for Wetland Retarding Basin No.5	Development	Land	3.371	$5,923,591.23		$5,923,591.23	212.115	$27,926.32
DI_DR_06	DELIVERY of Wetland Retarding Basin No.6 (WLRB-06)	Development	Construction		$2,266,329.48		$2,266,329.48	212.115	$10,684.44
DI_DR_06_L	LAND for Wetland Retarding Basin No.6	Development	Land	1.077	$1,774,866.26		$1,774,866.26	212.115	$8,367.47
DI_DR_06a	DELIVERY of Sediment Retarding Basin No.6a (SRB-06a)	Development	Construction		$344,930.20		$344,930.20	212.115	$1,626.15
DI_DR_06a_L	LAND for Sediment Retarding Basin No.6a (SRB-06a)	Development	Land	0.340	$880,000.00		$880,000.00	212.115	$4,148.69
DI_DR_07	DELIVERY of Wetland Retarding Basin No.7 (WLRB-07)	Development	Construction		$3,370,113.34		$3,370,113.34	212.115	$15,888.14
DI_DR_07_L	LAND for Wetland Retarding Basin No.7	Development	Land	1.603	$4,060,000.00		$4,060,000.00	212.115	$19,140.56
DI_DR_08	DELIVERY of Wetland Retarding Basin No.8 (WLRB-08)	Development	Construction		$2,641,550.23		$2,641,550.23	212.115	$12,453.39
DI_DR_09	DELIVERY of Wetland Retarding Basin No.9, Sediment Basin, Bioretention Basin (WLRB-09/SRB-09)	Development	Construction		$1,740,860.10		$1,740,860.10	212.115	$8,207.15
DI_DR_09_L	LAND for Wetland Retarding Basin No.9	Development	Land	0.471	$710,000.00		$710,000.00	212.115	$3,347.24
DI_DR_10	DELIVERY of Waterway No.1 (WW-01)	Development	Construction		$1,180,253.03		$1,180,253.03	212.115	$5,564.21
DI_DR_11	DELIVERY of Waterway No.2 (WW-02)	Development	Construction		$773,742.38		$773,742.38	212.115	$3,647.75
DI_DR_12	DELIVERY of Ephemeral Waterway (EW-01)	Development	Construction		$250,606.25		$250,606.25	212.115	$1,181.46
DI_DR_13	DELIVERY of Gross Pollutant Trap 1 (GPT-01)	Development	Construction		$253,569.00		$253,569.00	212.115	$1,195.43
DI_DR_14	DELIVERY of Gross Pollutant Trap 2 (GPT-02)	Development	Construction		$224,937.00		$224,937.00	212.115	$1,060.45
SUB-TOTAL DRAINAGE					**$53,319,160.55**		**$53,319,160.55**		**$251,369.12**

COMMUNITY FACILITIES

DCP PROJECT ID	PROJECT DESCRIPTION	INFRASTRUCTURE TYPE	DELIVERY TYPE	LAND AREA	PROJECT COST	EXTERNAL APPORTION-MENT	PROJECT COST TO MCA	DEMAND UNITS	LEVY PER HA
DI_CF_01	DELIVERY of Creamery Road Early Years and Community Hub (CF-01)	Development	Construction		$17,831,298.80		$17,831,298.80	212.115	$84,064.30
DI_CF_01_L	LAND for Creamery Road Early Years and Community Hub	Development	Land	1.000	$1,552,511.42		$1,552,511.42	212.115	$7,319.20
SUB-TOTAL COMMUNITY FACILITIES					**$19,383,810.22**		**$19,383,810.22**		**$91,383.50**

Note: All figures underlined subject to finalisation.

PAGE TO BE UPDATED

PLANNING

DCP PROJECT ID	PROJECT DESCRIPTION	INFRASTRUCTURE TYPE	DELIVERY TYPE	LAND AREA	PROJECT COST	EXTERNAL APPORTION-MENT	PROJECT COST TO MCA	DEMAND UNITS	LEVY PER HA
DI_P_01	Planning Costs	Development	Construction		$2,335,040.00		$2,335,040.00	212.115	$11,008.37
SUB-TOTAL PLANNING					**$2,335,040.00**		**$2,335,040.00**		**$11,008.37**
GRAND TOTAL				**27.813**			**$170,317,638.41**	**212.115**	**$802,949.52**

T9. CALCULATION OF COSTS – COMMUNITY INFRASTRUCTURE LEVY (CIL)

DCP PROJECT ID	PROJECT DESCRIPTION	INFRASTRUCTURE TYPE	DELIVERY TYPE	PROJECT COST	EXTERNAL AP-PORTIONMENT	PROJECT COST TO MCA	DEMAND UNITS	LEVY PER DWELLING	25/26 CAPPED LEVY/DWELLING
CI_CF_ML_01	DELIVERY of McCanns Lane Cultural Hub (incl library and museum)	Community	Construction	$31,148,602.00	89.26%	$3,345,359.85	4,242	$788.63	$519.85
CI_OS_01	DELIVERY of Northern Sports Reserve Pavilion	Community	Construction	$6,500,507.00	0.00%	$6,500,507.00	4,242	$1,532.42	$1,010.15
GRAND TOTAL				**$37,649,109.00**		**$9,845,866.85**		**$2,321.04**	**$1,530.00**

ADMINISTRATION

5.0 Administration 40

5.1 Payment of contributions and payment timing 40

5.1.1 Community Infrastructure Levy (CIL) 40

5.1.2 Development Infrastructure Levy (DIL) 41

5.1.3 Land and works-in-kind 42

5.1.4 Credit for over-provision 42

5.1.5 Funds administration 43

5.2 Construction and land value costs indexation 44

5.3 Review period 44

5.4 Adjustment to the scope of projects 45

5.5 Collecting agency (agency responsible for collecting infrastructure levy) 45

5.6 Development agency (agency responsible for works) 45

5

5.0 ADMINISTRATION

This section sets out how the DCP will be administered and covers the timing of payment, provision of works and land in kind and how funds generated by the DCP will be managed in terms of reporting, indexation and review periods.

The development infrastructure levy applies to subdivision and/or development of land.

The City of Greater Geelong will be both the **collecting agency** and the **development agency** for the purposes of the DCP.

5.1 PAYMENT OF CONTRIBUTIONS AND PAYMENT TIMING

5.1.1 COMMUNITY INFRASTRUCTURE LEVY (CIL)

The Community Infrastructure Levy must be paid in accordance with section 460 of the Planning & Environment Act (1987). Nevertheless, developers/landowners are strongly encouraged to settle the CIL prior to receiving a Statement of Compliance. This proactive approach simplifies the collection of development contributions, reduces administrative complexities for the City, and expedites the provision of community infrastructure.

5.1.2 DEVELOPMENT INFRASTRUCTURE LEVY (DIL)

The DIL will be payable to and collected by the collecting agency, for the:

- Subdivision of land; or
- Development of land which requires a planning permit; or
- Development of land which does not require a planning permit, as set out in this DCP.

FOR SUBDIVISION OF LAND

A DIL must be paid to the collecting agency for the land within the following specified time, namely after certification of the relevant plan of subdivision but not more than 21 days prior to the issue of a Statement of Compliance in respect of that plan or at such other time as agreed with the collecting agency in an implementation agreement under Section 173 of the Act.

Where the subdivision is to be developed in stages, the infrastructure levy for the stage to be developed only may be paid to the collecting agency within 21 days prior to the issue of a Statement of Compliance in respect of that stage provided that a Schedule of Development Contributions is submitted with each stage of the plan of subdivision. This Schedule of Development Contributions must show the amount of the development contributions payable for each stage and value of the contributions in respect of prior stages to the satisfaction of the collecting agency or at such other time as agreed with the collecting agency in an implementation agreement under section 173 of the Act.

If the collecting agency agrees to works and/or provision of land in lieu of the payment of the infrastructure levy, the landowner must enter into an agreement under Section 173 of the Act in respect of the proposed works and/or provision of land in kind to set out the specific arrangements agreed with the collecting agency.

FOR DEVELOPMENT OF LAND WHERE NO SUBDIVISION IS PROPOSED

Provided the DIL has not already been paid on the land to be developed, the development infrastructure levy must be paid to the collecting agency in accordance with the provisions of the approved DCP for each demand unit (net developable hectare) proposed to be developed prior to the commencement of any buildings and works for the development i.e. development includes (but is not limited to) buildings, car park, access ways, landscaping and ancillary components). The collecting agency may require that development infrastructure levy contributions be made at either the planning permit or building permit stage unless otherwise agreed by the collecting agency.

If the collecting agency agrees to works and/or provision of land in lieu of the payment of the infrastructure levy, the landowner must enter into an agreement under Section 173 of the Act in respect of the proposed works and/or land to be provided in kind to set out the specific arrangements agreed with the collecting agency.

WHERE NO PLANNING PERMIT IS REQUIRED

The following requirement applies where no planning permit is required. The land may only be used and developed subject to the following requirements being met:

- Unless some other arrangement has been agreed to by the collecting agency in an agreement under Section 173 of the Act, prior to the commencement of any development, a DIL for the land must be paid to the collecting agency in accordance with the provisions of the DCP.
- If the collecting agency agrees to works and/or provision of land in lieu of the payment of the infrastructure levy, the landowner must enter into an agreement under Section 173 of the Act in respect of the proposed works or provision of land which is proposed to be provided in kind to set out the specific arrangements agreed with the collecting agency.

5.1.3 LAND AND WORKS-IN-KIND

The collecting agency may permit development proponents to undertake works and/or land in lieu of cash payments, providing that:

- The works or land constitute projects funded by the DCP.
- The collecting agency agrees that the timing of the works would be consistent with priorities in the DCP.
- The development proponent complies with appropriate tendering, documentation, supervision and related provisions as required by the responsible authority.
- Works must be provided to a standard that generally accords with the DCP, unless an alternative is agreed by the collecting agency and the development agency.
- Detailed design must be approved by the collecting agency and the development agency and must generally accord with the standards outlined in the DCP unless an alternative is agreed by the collecting agency and the development agency.
- The construction of works must be completed to the satisfaction of the collecting agency and the development agency.
- There should be no negative financial impact on the DCP to the satisfaction of the collecting agency.

In particular, the works will only be accepted in lieu of a financial contribution required by the DCP to the extent that they constitute part or all of the design of the infrastructure item and reduce the cost to complete that design, to the satisfaction of the collecting agency. Temporary works will not be accepted as works in kind and any sacrificial works will not be credited.

Where the collecting agency agrees that works are to be provided by a development proponent in lieu of cash contribution (subject to the arrangements specified above):

- The credit for the works provided shall equal the final cost of the works as identified in the DCP, taking into account the impact of indexation.
- The value of works provided in accordance with the principle outlined above will be offset against the development contributions liable to be paid by the development proponent.
- No further financial contributions will be required until the agreed value of any credits are used.
- Where a developer is in credit against their contribution liability, this credit should be indexed annually in accordance with the DCP Levy movement.

5.1.4 CREDIT FOR OVER-PROVISION

Where the collecting agency agrees that a development proponent can deliver an infrastructure item (either works and/or land), the situation may arise where the developer makes a contribution with a value that exceeds that required by the DCP (the Over-Contribution).

In such a case the developer may be entitled to a credits equal to the value of the Over-Contribution to be applied against the obligation to pay the DIL for future stages of development or for the development of other properties within the DCP.

Where, a developer does not own or control any other properties within the DCP, or in such other circumstances as agreed by the collecting agency in writing, the developer may seek an agreement for the collecting agency to provide cash reimbursement where an over-contribution has been made. The application of credit and/or cash reimbursement (including the time for payment of any cash reimbursement) will be set out in the relevant agreement under Section 173 of the Act.

The details of credits and reimbursements for construction shall equal the cost of the works identified in the DCP, as indexed in accordance with Section 5.2. The value of credits and reimbursements for the transfer of land will need to be at the values that are outlined in the DCP, as revalued and indexed in accordance within Section 5.2.

5.1.5 FUNDS ADMINISTRATION

The administration of the contributions made under the DCP will be transparent and development contributions charges will be held until required for provision of the items in that class. Details of funds received and expenditures will be held by the collecting agency in accordance with the provisions of the Local Government Act 1989 and the Act.

The administration of contributions made under the DCP will be transparent and demonstrate the:

- Amount and timing of funds collected.
- Source of the funds collected.
- Amount and timing of expenditure on specific projects.
- Project on which the expenditure was made.
- Details of works in kind arrangements for project provision.

The collecting agency will provide for regular monitoring, reporting and review of the monies received and expended in accordance with the DCP.

Development contributions funds will be held into a dedicated reserve account, in compliance with the regulations and the Minister's Direction under the Act. The entirety of these funds, held within the account, will be exclusively utilized for the provision of infrastructure as specified in this DCP.

Should the Council make a decision to not pursue any of the infrastructure projects outlined in this DCP, or any funds not be expended prior to the end of this DCP, the City of Greater Geelong will adhere to the requirements outlined in section 46(Q)(4) of the Act.

5.2 CONSTRUCTION & LAND VALUE COSTS INDEXATION

Capital costs of all infrastructure items, including land, are in 2025 dollars and will be adjusted by the collecting agency annually for inflation.

In relation to the costs associated with infrastructure items other than land, the cost must be adjusted according to the following method:

- Drainage items, Roads, intersections and bridges – indexed in line with the Australian Bureau of Statistics' Producer Prices Indexes, Road and Bridge Construction Index, Victoria.
- All other infrastructure items – indexed in line with the Australian Bureau of Statistics' Producer Price Indexes, Non-Residential Building Construction Index, Victoria.

Estimates of land value will be revised annually by a registered valuer based on the same valuation principles. Revisions may occur more frequently if market conditions warrant.

The revised infrastructure costs must be calculated as at 1 July in each year.

The collecting agency will publish the amended contributions on the collecting agency's website within 14 days of the adjustments being made.

The CIL cap (currently $1,530 per dwelling for the 2025-26 financial year) is indexed annually on July 1 by the Minister for Planning and is published on the department website. The City reserves the right to increase the CIL in this DCP to allow for cost escalation in accordance with the indexation method in this DCP up to any new CIL cap. The higher levy will be collected from the date the new CIL cap is introduced.

5.3 REVIEW PERIOD

The DCP commenced on the date when it was first incorporated into the Greater Geelong Planning Scheme. The DCP adopts a long-term outlook for future development in Creamery Road.

The DCP should be reviewed and if necessary updated every 5 years (or more frequently if required). The 5 yearly review is anticipated to include:

- Updates to any aspect of the plan as required;
- Review of projects required, as well as their costs and scope (as relevant) and indicative provision trigger;
- Review of estimated net developable area (this will also be required if the PSP is subject to a substantive amendment); and
- Review of land values for land to be purchased through the plan.

Any review will need to have regard to any arrangements (e.g. section 173 agreements under the Act) for the implementation of the DCP

5.4 ADJUSTMENT TO THE SCOPE OF PROJECTS

The infrastructure projects in the DCP have been costed to a sufficient level of detail, however all of the projects will require a detailed design process prior to construction.

As part of detailed design, the City, or a development proponent with the consent of the Development Agency may amend or modify some aspects of projects, so long as they are still generally in accordance with the PSP and any direction regarding the scope outlined in the DCP.

In these cases there must be no negative impact on the DCP. The developer must pay the additional costs associated with the provision of the infrastructure item over and above the standard required by the DCP.

5.5 COLLECTING AGENCY (AGENCY RESPONSIBLE FOR COLLECTING INFRASTRUCTURE LEVY)

City of Greater Geelong is the collecting agency pursuant to section 46K(1)(fa) of the Act which means that it is the public authority to which all levies are payable. As the collecting agency, council is responsible for the administration of the DCP and also its enforcement pursuant to section 46QC of the Act.

5.6 DEVELOPMENT AGENCY (AGENCY RESPONSIBLE FOR WORKS)

City of Greater Geelong is the development agency and is responsible for the provision of the designated infrastructure projects which are funded under the DCP and the timing of all works.

IMPLEMENTATION STRATEGY

6.0 Implementation Strategy 47

6.1 Rationale for the implementation strategy 48

6.2 Implementation mechanism 49

6

6.0 IMPLEMENTATION STRATEGY

This section provides further details regarding how the collecting agency intends to implement the DCP. In particular, this section clearly identifies the rationale for the implementation strategy and details the various measures that have been adopted to reduce the risk posed by the DCP to all parties.

6.1 RATIONALE FOR THE IMPLEMENTATION STRATEGY

This implementation strategy has been included to provide certainty to both the collecting agency and development proponents. The implementation strategy recognises the complexities associated with infrastructure provision and funding and seeks to minimise risk to the collecting agency, development agency, development proponent and future community.

This implementation strategy has been formulated by:

- Assessing the PSP.
- Having regard to the development context.
- Assessing the need for finance requirements including upfront financing and pooling of funds.
- Agreeing the land value and indexing it appropriately (where possible).
- Identifying preferred implementation mechanisms to achieve the above outcomes and reducing the risk associated with the DCP to ensure that it will be delivered as intended.

6.2 IMPLEMENTATION MECHANISM

Under section 46P of the Act, the collecting agency may accept (with the consent of the development agency where the collecting agency is not also the development agency) the provision of land, works, services or facilities by the applicant in part or full satisfaction of the amount of levy payment. This can be by agreement with the collecting agency before or after the application for the permit is made or before the development is carried out.

To coordinate the provision of infrastructure, Schedule 7 to the Urban Growth Zone in the Greater Geelong Planning Scheme for the PSP requires an application for subdivision to be accompanied by an infrastructure plan to the satisfaction of the responsible authority.

The public infrastructure plan needs to show the location, type, staging and timing of infrastructure on the land as identified in the PSP or reasonably required as a result of the subdivision of the land and address the following:

- stormwater drainage works
- road works internal or external to the land consistent with any relevant traffic report or assessment
- the reserving or encumbrance of land for infrastructure, including for community facilities, sports reserves and open space
- any infrastructure works which an applicant proposes to provide in lieu of development contributions in accordance with the DCP
- land budget breakdown with staging sequencing
- any other relevant matter related to the provision of infrastructure reasonably required by the responsible authority.

Through the approval of these agreements, the City (acting as the collecting agency) will consider if and what infrastructure should be provided as works in kind under the DCP in accordance with section 46P of the Act. The agreement must include a list of the DCP infrastructure projects that the collecting agency has agreed in writing to allow to be provided as works and/or land in lieu.

APPENDICES

7.	Appendices	51
7.1	Appendix A - Property plan and property specific land budget	52
7.2	Appendix B - Project Sheets	55

7

7.1 APPENDIX A – PROPERTY PLAN AND PROPERTY SPECIFIC LAND BUDGET

7.1 APPENDIX A - PROPERTY PLAN AND PROPERTY SPECIFIC LAND BUDGET

PAGE TO BE UPDATED

T10. PROPERTY SPECIFIC LAND USE BUDGET

PROPERTY DETAILS		TOTAL AREA	TRANSPORT				COMMUNITY & EDUCATION			UNCREDITED OPEN SPACE						CREDITED OPEN SPACE		NDA							TOTAL NDA	PUBLIC LAND EQUALISATION METHOD UNDERS & OVER CALCULATION				
Address	Prop No	Total Area	Existing Road Being Retained*	Intersec-tion Extent	Intersec-tion Extent (DCP Land)*	Road Widening (DCP Land)	Existing Non-Govern-ment School	Proposed Early Years Hub (DCP Land)	Proposed Govern-ment School	Barwon Water Facilities	Cowies Creek Conser-vation Reserve	Drainage*	Drainage (DCP Land)*	Existing AOS (Myers Reserve)	Waterway	Active Open Space (DCP Land)	Local Open Space	NAC	Mixed Use Zone	Residential Growth Zone	Residential Growth Zone & Amenity Area	General Residential Zone*	General Residential Zone & Amenity Awrea	Investigation Area (Subject to Stormwater & Geotechnical Assessment)	Total NDA	Valuers 'Before Area'	DCP Residential Contri-bution (All)	Average Under Area	Under Provision	Over Provision
200 Ballan Road, MOORABOOL VIC 3213	1	24.481		0.990		0.583					6.787		1.406								2.368	11.635	0.711		14.714	14.166	0.583	1.832	0.583	-
35 Evans Road, MOORABOOL VIC 3213	2	1.535		0.215		0.004																1.316			1.316	1.320	0.004	0.178	0.004	-
35 Evans Road, MOORABOOL VIC 3213	3	0.543		0.001		0.140																0.402			0.402	0.542	0.140	0.054	0.054	0.086
Existing Road Reserve	4	1.702	1.702																						0.000	-	-	-	-	-
20 Evans Road, BELL POST HILL VIC 3215	5	37.626									11.796	0.400	0.471				1.290				6.521	14.474	2.674		23.669	24.140	0.471	3.193	0.471	-
10 Evans Road, BELL POST HILL VIC 3215	6	2.435																				2.435			2.435	2.435	-	0.328	-	-
2 Evans Road, BELL POST HILL VIC 3215	7	2.892				0.038																2.344	0.510		2.854	2.892	0.038	0.385	0.038	-
20 Evans Road, BELL POST HILL VIC 3215	8	22.670									12.167						1.690				1.116	6.505	1.192		8.813	8.813	-	1.189	-	-
PARENT - 30 Avonlea Road, BELL POST HILL VIC 3215	9	2.039									1.811											0.189		0.039	0.228	0.241	-	0.033	-	-
PARENT - 30 Avonlea Road, BELL POST HILL VIC 3215	10	2.061									1.829											0.092		0.140	0.232	0.236	-	0.032	-	-
PARENT - 30 Avonlea Road, BELL POST HILL VIC 3215	11	0.594									0.594														0.000	-	-	-	-	-
100 Ballan Road, BELL POST HILL VIC 3215	12	36.968		0.966		0.318						0.554	3.395			8.641	0.300	3.976	3.258	0.440	13.411	0.627	1.085		22.797	33.976	11.182	3.075	3.075	8.107
60 Avonlea Road, BELL POST HILL VIC 3215	13	37.989								1.000		2.522	4.384		0.811		0.499			2.186	15.638	7.237	3.429	0.281	28.771	33.559	4.288	3.949	3.949	0.339
PARENT - 30 Avonlea Road, BELL POST HILL VIC 3215	14	13.088									4.964	1.973										1.922		4.228	6.150	5.915	-	0.798	-	-
165 Bluestone Bridge Road, BELL POST HILL VIC 3215	15	0.040									0.040														0.000	-	-	-	-	-
50 Avonlea Road, BELL POST HILL VIC 3215	16	2.027											0.037									0.826	0.897	0.267	1.990	1.990	-	0.268	-	-
40 Avonlea Road, BELL POST HILL VIC 3215	17	2.025															0.500					0.689	0.835		1.524	1.025	-	0.138	-	-
PARENT - 30 Avonlea Road, BELL POST HILL VIC 3215	18	2.025																				1.446	0.579		2.025	2.025	-	0.273	-	-
85-105 Bluestone Bridge Road, BELL POST HILL VIC 3215	19	2.098									0.011											2.087			2.087	2.087	0.328	0.237	0.237	0.091
20 Avonlea Road, BELL POST HILL VIC 3215	20	2.035											0.420									1.034	0.581		1.615	2.035	0.600	0.194	0.194	0.406
65-75 Bluestone Bridge Road, BELL POST HILL VIC 3215	21	1.606											1.183									0.423			0.423	1.606	1.211	0.053	0.053	1.158
	22	0.657									0.368											0.289			0.289	0.289	-	0.039	-	-
90-140 Bluestone Bridge Road, BELL POST HILL VIC 3215	23	0.541																				0.541			0.541	0.541	-	0.073	-	-
45 Avonlea Road, BELL POST HILL VIC 3215	24	2.025																				0.956	1.069		2.025	2.025	-	0.273	-	-
35 Avonlea Road, BELL POST HILL VIC 3215	25	2.025																				0.957	1.068		2.025	2.025	-	0.273	-	-
25 Avonlea Road, BELL POST HILL VIC 3215	26	2.025																				0.958	1.067		2.025	2.025	-	0.273	-	-
15 Avonlea Road, BELL POST HILL VIC 3215	27	1.810																				0.91	0.900		1.810	1.810	-	0.244	-	-
5 Avonlea Road, BELL POST HILL VIC 3215	28	0.300																				0.07	0.230		0.300	0.300	-	0.040	-	-
60 Ballan Road, BELL POST HILL VIC 3215	29	5.281		0.137		0.007												0.024	2.538		2.551	0.022			5.135	5.144	0.007	0.693	0.007	-
445 Ross Road, BATESFORD VIC 3213	30	23.719		0.848	0.008	0.014		1.000	3.500								1.000			1.155	10.705	4.468	1.021		17.349	18.444	1.095	2.340	1.095	-
65 Creamery Road, BELL POST HILL VIC 3215	31	18.048											2.833			3.250				0.704	7.214	3.541	0.506		11.965	18.048	6.083	1.614	1.614	4.469
125 Creamery Road, BELL POST HILL VIC 3215	32	3.790												3.790											0.000	-	-	-	-	-
125 Creamery Road, BELL POST HILL VIC 3215	33	0.366												0.366											0.000	-	-	-	-	-
125 Creamery Road, BELL POST HILL VIC 3215	34	13.305	0.145											13.160											0.000	-	-	-	-	-
5 Creamery Road, BELL POST HILL VIC 3215	35	2.127		0.005	0.260																	1.862			1.862	2.127	0.265	0.251	0.251	0.014
15 Creamery Road, BELL POST HILL VIC 3215	36	1.825																				1.825			1.825	1.825	-	0.246	-	-
25 Creamery Road, BELL POST HILL VIC 3215	37	2.025																				2.025			2.025	2.025	-	0.273	-	-
55 Creamery Road, BELL POST HILL VIC 3215	38	2.429																			0.781	1.12	0.528		2.429	2.429	-	0.328	-	-
105 Creamery Road, BELL POST HILL VIC 3215	39	11.611					11.611																		0.000	-	-	-	-	-
85 Creamery Road, BELL POST HILL VIC 3215	40	3.197																				2.255	0.942		3.197	3.197	-	0.431	-	-
110 Creamery Road, BELL POST HILL VIC 3215	41	1.864																				0.567	1.298		1.865	1.864	-	0.251	-	-
120 Creamery Road, BELL POST HILL VIC 3215	42	1.000											0.340									0.443	0.217		0.660	1.000	-	0.135	-	-
375 Ballarat Road, BATESFORD VIC 3213	43	12.337		0.629		0.254															2.020	8.295	1.139		11.454	11.708	0.254	1.545	0.254	-
375 Ballarat Road, BATESFORD VIC 3213	44	7.023				0.140											1.000					2.069	3.814		5.883	6.023	0.140	0.794	0.140	-
305 Ballarat Road, BATESFORD VIC 3213	45	13.078				0.082						0.400	1.077									9.513	2.006		11.519	12.678	1.508	1.507	1.507	0.001
341-345 Ballarat Road, BATESFORD VIC 3213	46	2.024				0.083																1.941			1.941	2.024	0.083	0.262	0.083	-
335-339 Ballarat Road, BATESFORD VIC 3213	47	2.024				0.078																1.946			1.946	2.024	0.078	0.263	0.078	-
Existing Road Reserve	48	6.791	6.791																						0.000	-	-	-	-	-
Existing Road Reserve	49	2.840	2.607								0.234														0.000	-	-	-	-	-
GRAND TOTAL		**344.566**	**11.245**	**3.791**	**0.268**	**1.741**	**11.611**	**1.000**	**3.500**	**1.000**	**40.601**	**5.848**	**15.546**	**17.316**	**0.811**	**11.891**	**6.279**	**4.000**	**5.796**	**4.485**	**62.325**	**102.256**	**28.298**	**4.955**	**212.115**	**238.578**	**28.358**	**28.359**	**13.687**	**14.671**

7.2 APPENDIX B – PROJECT SHEETS

PROJECT SHEETS PENDING

Each DCP item to have an individual Project Sheet following finalisation of DCP.

CITY OF GREATER GEELONG
Wadawurrung Country
PO Box 104
Geelong VIC 3220
P: 5272 5272
E: contactus@geelongcity.vic.gov.au
www.geelongaustralia.com.au

© City of Greater Geelong 2025

LATEST NEWS:

@CityofGreaterGeelong
@GreaterGeelong
@CityofGreaterGeelong
CityofGreaterGeelong

CITY OF GREATER GEELONG