

**Title:- Draft Bellarine Peninsula Statement of Planning Policy.
(Stage 3 Submission)**

Subject. :-

Comments and suggestions on the implementation of the Bellarine Peninsula Distinctive Area and Landscape (DAL) via the Draft Bellarine Peninsula Statement of Planning Policy. (BPSPP)

Relevant comments on this above document are included in the details below. :-

a) Monitoring & Assessment required.

To ensure the DAL is producing the required outcomes of the DAL.

Over time, it needs to be **monitored and assessed**, and be modified as agreed by the Relevant Authorities (including the communities).

As a guide, this monitoring and assessment should occur (after it gets it's "feet on the ground") after the first year and every 10 years after that, except if it is realized that there is a special need for change raised by the community, for assessment before that.

The DAL mentions (pg 12) that it must "Set a 50 year vision" - this is very unrealistic and does not seem to contemplate future changes which identify future characteristic features that need protecting.

For example, The Basin, the Rail Trail & the Clifton Springs Dell etc.

Even considering current crisis like Covid19 and climate change, life's parameters will change.

There is potentially going to be, eventually a population explosion towards the Bellarine Peninsula, which may be towards two and three times or more, as our, and the current world population increases.

We need to be planning to ensure our area is maintained as a pleasant area to live, and ensure it and our capacity to use the fertile land we have, can produce sustainable food production when required.

In so many parts of the world, people are living in very cramped conditions and cannot sustain themselves, we must recognize this, and how we can help and optimize the situation here. Alternative other Victorian areas need developing. I.e. the DAL must be reviewed regularly to achieve what is best for the communities and its character.

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b) The format of the CoGG Responsible Authorities needs revision to include formal input from the community's.

The current CoGG council does not have the facility to ensure adequate community consultation occurs. We have realized that after many contentious permit approvals, our council are 100% focused on the rules and regulations of permit approvals, and they approve submitted permit applications accordingly.

The only way the community can have an effect is to work through our elected councilors. This initiates an action to be taken to VCAT but the community do not have the expertise or legal understanding to effectively achieve their desired outcome.

Council are still unable to assist here as "they are not allowed to be seen as being biased towards either the community or the developer" **and** they are not permitted to provide legal or other assistance.

This is a disadvantage to the effectiveness of the community's voice, and it is not in the scope of the elected councilors to help us, I suggest the following.

Our friends, the Wadawurrung people, have wording on page 2 of the BPSPP which says :-

"We are committed to genuinely partner and meaningfully engage with the traditional owners... etc"

The general community needs to be represented as a Relevant Authority similar to the Wadawurrung traditional owners.

This wording above (or similar) needs to be incorporated into the DAL wording so that all communities can be effective in the development of this DAL (or any other) document affecting communities.

Refer to the first paragraph of pages 11 and 15.

I would suggest that a representative section of the community be advised of any changes to the DAL be involved in the monitoring (as mentioned in "a)" above
le: Significant permit approval information needs to be sent to all the main media outlets (papers and websites), Bellarine Peninsula Community Associations, Neighbourhood Centers, and other main community support groups. (Schools, Sporting groups etc) for notification and comment as appropriate.



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le: Communities need to be at the discussion table to convey local priorities and this will ensure the objectives and extent of the DAL is met as per its aim. For the DAL to be relevant it needs to have advice from the Council as a Relevant Authority, but the information conveyed is also consistent with the information and recommendations of the community.

le: we have examples where our council has shown no empathy towards compulsory acquisition of properties. For example, it is reasonable that acquisition of private property is appropriate for a project like the Drysdale Bypass road as it provides a general benefit to the community. However, the acquisition of private property for a property developer so he can make a profit on a 500+ lot subdivision, (highlighted as inappropriate by the community) almost aligns to a criminal offence.!

These sort of decisions need controlling in the DAL.!

(It is disappointing that only a few hundred of responses to the DAL were received from the whole population of the Bellarine - assuming it was advertised appropriately .? and raises questions to its validity as far as community acceptance in the first two stages.!))

c) The DAL needs to have its own specifications regarding what is allowable in the specific areas it is protecting

For example the specifics of maintaining a "Particular Neighbourhood Character" from the DAL as it is can be predominately seen as " **It is all in the eye of the beholder**" by the assessor's personal judgment. It should relate more detailed specific items. This may be to specify land lot area in combination with minimum green percentage area etc.

Areas of special character may also require buffer zones around them.

I.e. Historic buildings do not want multi-story buildings near them.

Similarly "Diverse" variation in lots and residences, may not be appropriate, especially when the developers use this description to try and justify as many small lots as they can on their proposed subdivision in an adjacent area with larger lots.

This would need to be assessed in conjunction with the community, as discussed in b) above.

le: it is inadequate for council to use their standard rules and regulations for subdivision and house permit approvals which do not meet the criteria of the DAL.



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d) Out of Date & inaccurate Regulations used to compile the DAL.

The CoGG submitted a document which they proposed alternative to the Drysdale / Clifton Springs Structure Plan which they described as suitable as being "Incorporated" into the City of Greater Geelong Settlement Strategy Amendment C395 for use in the DAL.

The Drysdale / Clifton Springs structure plan should have had a review after 5 years and then 10 years after its implementation.

This review did not occur, and after evidence that significant changes have occurred since then, the Structure Plan is significantly out of date and needs significant amendment.

It cannot be used as part of the DAL criteria until it is fully revised up to today's conditions. Again, this should be done with community consultation. Also, the council procedures relating to insufficient notification to the community needs correcting. Clear and adequate notification to all of that locations affected people, & adequate timing etc is required as previously mentioned.

e) "Protected Settlement Boundary Maps and their Legends are not clear.

The Settlement Boundary maps are a very positive outcome with defined boundaries, for controlling the Character of the towns on the Bellarine Peninsula. However One example of detail that caused considerable heated debate and wasted time at a recent VCAT Hearing was the fact that land owned by the Cemeteries Trust was classed as "Land for Incremental Change" areas

On investigation it was found that all four of the cemeteries on the Bellarine Peninsula are all classed as incremental change areas. This seems completely inappropriate as the Developers Lawyer's see these as potential subdivision areas - as we found out the hard way.

It would seem appropriate that all cemeteries, churches, and schools etc be put into a "miscellaneous" or "other" category.

There should also be a buffer zone around the cemetery boundaries to ensure an ambience for that area & protection from any adjacent "back yards" and road traffic disturbances.

This really asks for the neighbourhood character of these areas be maintained.

The maps need updating before being included in the DAL.

The Western boundary of the "Bellarine Peninsula Declared Area", are vague and undecided by council, and these details need to be clarified before the DAL is released. Ref page 10 and 25.



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The maps also need to be updated regularly to indicate new housing expansions ie approx residences per hectare or similar to ensure projected estimates are happening in allocated areas.

f) Environmental risks and resilience. Page 25.

This item already requires revision as the recent climate change report highlights. Refer IPCC Report below.

<https://www.ipcc.ch/report/ar6/wg1/>

We need to incorporate real action to slow down climate change. The DAL seems to concentrate on band-aiding the results of climate change, rather than preventing, slowing down, or stopping it.

ie: using more greenery around houses, more treed areas, more renewable energy for houses and vehicles etc. With control of house density and resistance to floods and droughts and fires and extreme temperatures, we can better protect our Distinctive Area & Landscape and its attributes.

The items currently in the DAL require assessing and determining what needs to happen and provide a date when it is required. Refer Page 27 to 39.

Hundreds of houses and cars, all with their own dangerous fuel sources, and all in close contact in the current planning criteria of small lots, are at much more of a risk of "heat island stress" and high fire risk than a well maintained and cared-for treed /vegetation area with a lower fire rating.

g) The "Settlement Boundary Maps" need additional detail.

The boundaries shown on the maps need to show all the relevant boundary road names and also the primary road names within the boundaries, need naming for clarity.

It is otherwise ambiguous as to where the outer boundaries are, and where the relevant various "development" areas are

ie: increased diversity - substantial change; incremental change; minimal change; growth areas, etc.

They need to be clearly evident to be able to be read on an A4 sheet of paper or each area to be shown on a separate sheet.



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- h) **The "Green Break" areas shown on the maps need clarification and DAL their controls on permit approvals.**

As the whole Bellarine Peninsula can be classed as an area of Tourism & a destination of significance, the area needs controls on what can be allowed in the areas "Green Break" areas. For example, although the DAL draft currently covers the main townships, there are many smaller sized areas like Bellarine (- just S-W of Portarlington) , Hermsley, Mannerim, etc, which would be very attractive for potential change by developers (ie great views & positions).

The same applies to "Green Break" area's that exist adjacent too, but just outside the "Protected Area Boundaries" which currently have multiple residences.

What controls are on these Green areas to ensure overdevelopment, with harm to our area character, does not occur.

The same would apply to the "green" areas directly adjacent to the boundaries on the current DAL town maps. What controls are proposed for these currently "green" areas.? Ie: a minimum Hectare per residence etc.?

- i) The Draft needs to contain an index of all the abbreviated terms used in this draft document and it's references, and also a description / explanation of words that are not used commonly in the community, and/or, are specific "Planning" department words that need clarifying or more detail.

Final Remarks :-



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A significant number of my comments seem to relate to dubious experiences or unclear information supplied by our "Authorized Authority" at the CoGG.

If their information is accepted "as is", it places the DAL Draft under a cloud of incorrect & misleading detail & uncertainty which will handicap it from achieve it's aims.

That is, it is imperative that there is clarity and correct detail around the wording. Also, that there are sufficient and clear measures on the detail guidance council can use for all the special areas involved, to ensure that existing, current rules and regulations are not resorted to, when assessing areas with special characteristics in the DAL.

I look forward to reviewing the updated version of this Draft BPSPP document.

Also:-

- 1) I would very much appreciate an email response from you that you have received my submission.
- 2) I would also appreciate a response on your thoughts on the issues that I have mentioned in this submission.

Thank you very much for your time, and thank you for working towards looking after our future, & the future of our subsequent generations.

