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Contact: [REDACTED]

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Engage Victoria  
Distinctive Areas and Landscapes

Via email: [planning.implementation@delwp.vic.gov.au](mailto:planning.implementation@delwp.vic.gov.au)

Dear Sir/Madam,

TGM Group Pty Ltd  
(a Cardno Company)

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## Distinctive Area Landscapes – Bellarine Peninsula

[REDACTED]

We write on behalf of [REDACTED] owners of land at [REDACTED] [REDACTED] in response to the Bellarine Peninsula Distinctive Area and Landscape Draft Bellarine Peninsula Statement of Planning Policy.

We understand that the proposed permanent Drysdale Clifton Springs settlement boundary as proposed via this process is based on the existing town settlement boundary established approximately 10 years ago and believe that this process provides the ideal opportunity to consider and include the future longer term growth direction of this town based on the contemporary needs of this community.

We therefore seek an amendment to the Bellarine Peninsula Distinctive Area and Landscape Draft Bellarine Peninsula Statement of Planning Policy and proposed Drysdale Clifton Springs permanent settlement boundary to postpone the introduction of the permanent settlement boundary for Drysdale Clifton Springs until a comprehensive and thorough review of the contemporary needs of the town are assessed.

This process we believe should include the identification of the subject land at 161-249 Coriyule Road, Curlewis to provide for the future long-term supply of residential land for this District Town in the Bellarine Peninsula.

### Subject land

The subject and is approximately 59 hectares in area and described as farming zone land located to the west of proposed residential land known as Jetty Road Stage 2 which is being prepared for rezoning and subdivision. The site contains an existing dwelling with road frontage to Coriyule Road (north) and Scarborough Road (west) and adjoining the Bellarine Rail Trail to the south.

The subject land and the adjoining land directly located on its eastern boundary form the logical longer-term extension of Drysdale Clifton Springs urban growth area. The subject also provides ideal integration opportunities with the existing and future

development of Drysdale Clifton Springs via Coriyule Road and will have access to the Bellarine Highway via Hemsley Road which is planned to be signalised to manage additional traffic.



Location of subject land

The identification of this land in the proposed permanent Drysdale Clifton Springs settlement boundary marks the logical direction for future growth of this town and provides long term growth direction and surety consistent with the Statement of Planning Policy. The inclusion of this land for future residential development is also logical given there are no other potential growth direction opportunities for this town. Land to the east and south of the town is now separated by the newly constructed Bellarine Highway bypass road and as Port Phillip Bay is located to the north there is no other future growth direction than land to the west.



Logical future growth direction

**Strategic Support**

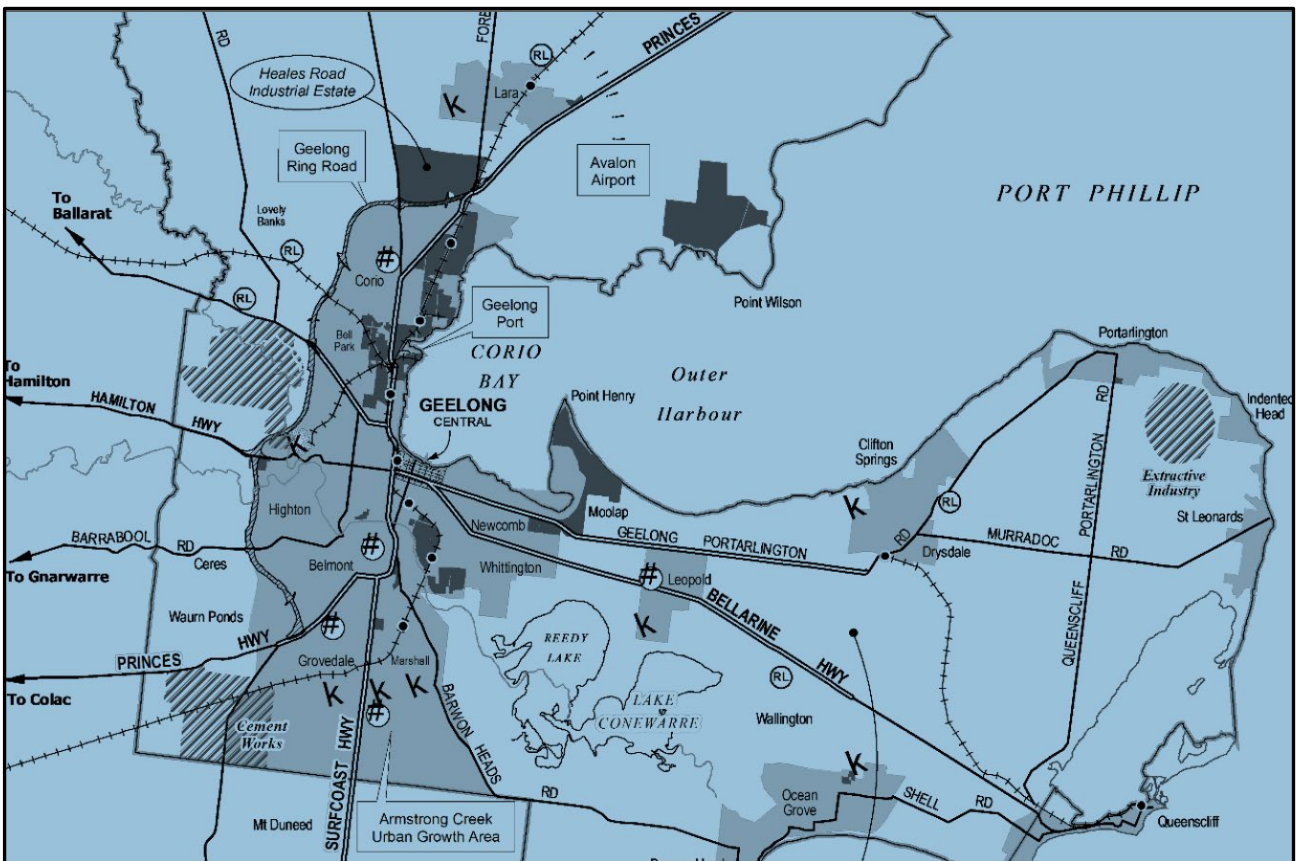
The identification of additional long-term residential growth land accords with the strategic planning direction of Drysdale Clifton Springs which is one of the larger towns of the Bellarine Peninsula where additional urban growth is expected.

**G21 Regional Growth Plan**

The G21 Regional Growth Plan identifies Drysdale/Clifton Springs as a District Town where additional significant housing growth is encouraged to facilitate a population increase from 10,000 to 100,000 people. Drysdale/Clifton Springs is also as a sub-regional employment area. The subject land is located to the west of the Drysdale/Clifton Springs growth area boundary which we submit is virtually the only long-term growth direction option for this town and its identification for growth accords with this G21 Region Growth Plan.

## Geelong Framework Plan

The Geelong Framework Plan identifies Drysdale/Clifton Springs as one of a number of primary towns of the City of Greater Geelong where urban growth outside the central Geelong area has been encouraged. Drysdale/Clifton Springs is located approximately 24 kms to the east of Geelong.



## The Victorian Marine and Coastal Policy

The Victorian Marine and Coastal Policy also seeks to:

*Identify clear settlement boundaries in planning schemes, to plan for growth and protect coastal values; and direct growth to within these boundaries. Where no settlement boundary is identified, define the extent of the settlement by the existing urban zoned land and land identified in the planning scheme for future urban settlement.*

Clearly this policy supports the identification of land for future urban development within settlement boundaries.

## **Geelong Planning Scheme**

### **Clause 21.14 The Bellarine Peninsula**

Clause 21.14 The Bellarine Peninsula of the Geelong Planning Scheme seeks to retain the physical attributes of the Bellarine Peninsula whilst supporting attractive and sustainable industrial, commercial, retail, agricultural and tourism development in designated locations, to service the wider Bellarine community.

It also supports the district towns of Ocean Grove, Drysdale and Leopold to fulfil their role as service hubs for the Bellarine Peninsula and seeks to ensure that land use and development proceeds generally in accordance with the relevant Structure Plan maps included in this Clause.

### **Drysdale/Clifton Springs**

Drysdale/Clifton Springs is a fully serviced District Town with community, recreational, commercial and education facilities. The town also has a well-developed industrial estate. While Drysdale/Clifton Springs is in a bay location the town still retains a strong connection with the rural hinterland which is reflected through the historic village character of Drysdale.

As a District Town the services within the town are not only used by the local community but also by residents of Portarlington, Indented Head and St Leonards, as well as visitors to the Bellarine Peninsula. Given Drysdale/Clifton Springs is still a relatively affordable coastal place to live, the town is attractive to many families and retirees.

It has a mostly permanent population and residents who generally commute to Geelong or Melbourne for work. Both State and Local Planning Policies have identified Drysdale Clifton Springs as a town that has high capacity for urban growth and as such it has been designated as one of the main urban growth areas in the Bellarine Peninsula.

Given the towns basic residential function and well-developed services and industrial area the town has the capacity for more growth which accords with its District Town status. We also believe as Drysdale Clifton Springs functions as a dormitory suburb of Geelong rather than a tourist destination which reflects the majority of towns in the Bellarine therefore its growth is unlikely to impact those values that attract tourists to this region. It also arguably provides a more appropriate area for growth as it contains commercial, community and service industry's all capable to provide long term employment and service the local community.

### **Bellarine Peninsula Development Demands**

We understand that this process has been undertaken to secure the cultural, environmental and landscape values of the Bellarine Peninsula for the future by essentially reducing the development of the region and directing growth to Armstrong Creek, and the Western and Northern Geelong Growth fronts that have yet to be development. We also understand that this development direction reflects the preferences and priorities



of the Victorian Community. However, we submit that given the unprecedented housing demand in the Bellarine Peninsula that there remains a strong community preference to live in this area.

We agree that growth cannot continue without ensuring that the important features of the Bellarine Peninsula are preserved. But we believe that subject to preventing impacts to the area's most significant features that some growth can continue and clearly the majority of this growth should be directed to the District Towns and particular Drysdale Clifton which has been developed to support residential growth and has a substantial residential function as opposed to the other towns of the region that function as tourist towns.

We believe that the continuity of growth at this location will not impact on the values of the Bellarine Peninsula as compared to those towns located in more sensitive locations along the bay and outer coast and will continue to provide economic stimulus which has underpinned the prosperity of Drysdale Clifton Springs and the broader Bellarine Peninsula. The continuation of growth at Drysdale Clifton Springs will also build on the existing community and local residential needs and thus will not contribute to the pressures of tourism which we understand precipitated the need to introduce this restrictive policy and prevent impacts on the regions natural features.

We also believe that there is also an evident distinction between the development of coastal towns compared with settlements in Port Phillip and Corio Bays where the environmental sensitivities and dynamic coastal processes are considerably less critical compared to the sensitive environmental attributes of settlements in the open coastal zone. The Bellarine Peninsula has both bay and open coastal settlements however there is no distinction in Draft Bellarine Peninsula Statement of Planning Policy which demonstrates fundamental understanding of the environmental and landscape variables of these towns as the Policy mandates permanent boundaries for all the towns based on the existing town boundaries.

Clearly the growth demands of the Bellarine Peninsula are more appropriately located in a bayside town like Drysdale Clifton Springs which has far greater capacity to facilitate growth and considerably less environmental and landscape issues to be address as compared to towns located on the open coast.

### **Strategic Planning Support**

Drysdale Clifton Springs is identified in the Geelong Planning Scheme as a District Town where growth is expected. This includes:

#### Clause 11.01-1R Settlement - Geelong G21 supports:

- > The growth of Bannockburn, Colac, Drysdale/Clifton Springs, Lara, Leopold, Ocean Grove and Torquay/Jan Juc as district towns by building on existing and planned infrastructure and focussing growth along key road and rail networks.
- > Reinforce the role of district towns in providing services to surrounding areas.

#### Clause 21.14 The Bellarine Peninsula

The relevant strategies of this policy include:

- > To support the different roles and functions of townships on the Bellarine Peninsula.
- > To provide attractive and sustainable industrial, commercial, retail, agricultural and tourism development in designated locations, to service the wider Bellarine community.
- > To preserve the individual character, identity and role of each Bellarine township
- > Support the district towns of Ocean Grove, Drysdale and Leopold to fulfil their role as service hubs for the Bellarine Peninsula.
- > Ensure land use and development proceeds generally in accordance with the relevant Structure Plan maps included in this Clause.

Clearly the planning scheme continues to support Drysdale Clifton Springs as a development hub where growth is expected. The above policies also require that land use changes are consistent with the recommendations in Structure Plans.

We understand that the subject land is currently outside the current settlement boundary and therefore we believe it makes sense that before a new permanent boundary is considered that a thorough structure plan review is undertaken that addresses a broader range of issues in addition to the Distinctive Area Landscapes considerations. We believe that this accords with the objectives and Strategies of Clause 11.02-2S Structure Planning which seeks to:

*Ensure effective planning and management of the land use and development of an area through the preparation of relevant plans.*

To achieve this the Clause recommends:

*Undertake comprehensive planning for new areas as sustainable communities that offer high-quality, frequent and safe local and regional public transport and a range of local activities for living, working and recreation.*

We believe that this process would benefit from a more comprehensive review prior to determine the location of permanent settlement boundaries particularly given that the introduction of permanent settlement boundaries is discretionary power under the Act. This would better align with accepted orderly planning processes and would provide additional strategic justification subject to a broader more robust assessment that in our view should consider the different roles of these towns and the needs of the broader community. We believe that this is a sounder process compared to the current draft policy which proposes the introduction of permanent settlement boundary consistent with existing town boundary of Drysdale Clifton Springs which was determined some years ago.

## **Bellarine Peninsula Distinctive Area and Landscape Draft Bellarine Peninsula Statement of Planning Policy**

We submit that a more comprehensive structure plan review of Drysdale Clifton Springs will also assist in fulfilling the proposed 50-year vision of the Statement of Planning Policy which must:

*Set a 50-year vision that identifies the values, priorities and preferences of the Victorian community in relation to the distinctive attributes of the declared area, including preferences for future land use and protection and development.*

We also submit that the 50-year vision cannot be delivered by the introduction of a permanent settlement boundary along the current town boundary that was introduced over 10 years ago subject to different strategic planning policy considerations and growth and demand projections. Therefore prior to the introduction of permanent settlement boundaries a more comprehensive review is warranted and accords with orderly and logical planning wisdom. This will pose no threat to the environmental and landscape values of this region as no residential expansion of Drysdale Clifton Springs can occur outside the current town boundary without planning approval.

We note that the draft policy lacks any reference to a review mechanism or process when a structure planning review or a review of the permanent settlement boundaries may be appropriate. Therefore, in addition to deleting the proposed introduction of the permanent settlement boundaries at this time the policy needs to include guidance to review the needs of these towns and more importantly the District Towns where some additional growth is considered acceptable and has strategic planning support.

As currently the draft policy is drafted without including when a structure planning review would be considered and under what conditions would Drysdale Clifton Springs expand outside the current growth opportunities to meet the future demands of the community.

### **Consultation**

Public consultation has always been the foundation for the strategic and statutory planning processes where land use changes are proposed in the State of Victoria. This has been in the form of both written and verbal submissions to allow submitters a chance to expand and emphasise further on matters they deem as significant that may be difficult to emphasise and communicate in writing. It also provides an opportunity for applicants to further clarify their proposal and respond to matters raised.

We understand that it is proposed to limit consultation in response to this policy to written submissions only and not proceed to consider verbal submissions at a subsequent Panel or Advisory Committee. Given the far-reaching impact of this amendment and its likely long-term effect on the future of the Bellarine Peninsula it is incumbent on DELWP and Council to appoint an independent body to hear submissions. Otherwise we are concerned whether this submission will be considered impartially and independently which is normally achieved by the appointment of an independent Panel or Committee.



## Conclusion

In conclusion we submit that there is considerable justification to postpone the introduction of the discretionary permanent settlement boundary for Drysdale Clifton Springs until a more comprehensive assessment of the needs of this community are determined. We also believe that the proposed policy would benefit by addressing greenfield development needs and when and under what conditions would settlement boundaries be reviewed.

We also submit that Drysdale Clifton Springs will benefit from a thorough structure planning review and the recognition of long-term growth opportunities to provide certainty to the community and to meet the 50-year vision of the Statement of Planning Policy.

We contend that land to the west of Drysdale Clifton Springs including the subject land provides the most logical direction for future urban development of this town and submit that its early identification accords with the towns status as a District Town.

If you have any queries please do not hesitate to contact [REDACTED] on [REDACTED]

Yours sincerely,  
CardnoTGM

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**Planning Manager, Regional Victoria/Principal**