



Drysdale Clifton Springs Curlewis Association

(Incorporation No. A0046568H)

Submission by the DCSCA

Bellarine Peninsula Distinctive Area and Landscape

Draft Statement of Planning Policy

The Drysdale, Clifton Springs, Curlewis Association (DCSCA) strongly supports the State Government's initiative in preparing and approving a Statement of Planning Policy (SPP) for the Bellarine Peninsula consistent with the undertaking to the Community by The Hon Richard Wynne as contained in the Minister's Press Release dated 27th September 2018.

The following DCSCA submission provides feedback and all suggestions and recommendations are intended to be constructive and to enhance the final Statement of Planning Policy for the Bellarine Peninsula.

PREAMBLE

The Drysdale, Clifton Springs and Curlewis Community Association (DCSCA) welcomes the opportunity to contribute to the Draft Bellarine Peninsula Statement of Planning Policy (SPP), as residents are resolute that the SPP provide a clear, detailed and binding framework to ensure appropriate development in the Bellarine will protect, celebrate and preserve the area's distinctive attributes and character. One of our Association's objectives is to represent local residents and have a history of providing a platform for community deliberation on civic matters. The Drysdale and Clifton Springs Community Association (DCSCA) was established in October 2004 and held its first meeting on the 16th of January 2005. In January 2017, it changed its name to the Drysdale, Clifton Springs Curlewis Association. **We currently have 148 members of whom 70 are financial members with voting rights at our up-coming AGM.**

The DCSCA very much values the opportunity to continue to be involved in the consultation process in relation to the recently released Draft Bellarine Peninsula Statement of Planning Policy (SPP). It was heartening to note that participants in the previous consultation process identified "**overdevelopment, urban development impacts and settlement boundaries**" as significant issues.

The DCSCA is delighted that the Government and our local member Lisa Neville are delivering on their promises that the Bellarine Peninsula's unique, attractive rural landscape and significant environmental features would be protected from further outward growth of urban sprawl. Furthermore, we acknowledge DELWP's hard work in creating a draft SPP that is well structured, with commendable vision, objectives and strategies; and that illustrates how community engagement can be achieved in a fair and constructive manner.

The DCSCA has gauged community opinions in order to provide further feedback to DELWP on the draft SPP. Our objective in this submission is to ensure that the final document is robust and will stand the test of time and achieve its vision. We are an active member of the Combined Bellarine Communities Association and we are broadly supportive of the detailed submissions of each of the Associations.

The following details the key issues that we believe must be addressed.

REPLACE REFERENCES IN THE SPP REPORTS TO THE OUT DATED 2010 STRUCTURE PLAN

The DCSCA, over the space of 18 months, has challenged several planning amendments that will in our view lead to instances of "**over-development and urban development impacts**". These proposed developments within Drysdale and Clifton Springs are more in line with the Curlewis settlement. "**Contemporary residential development in Curlewis differs for other areas, with predominantly**

smaller lot sizes and significantly less vegetation in the private realm¹. In relation to the proposed rezoning in Amendment C363, decisions by the CoGG, the Independent Panel and the Planning Minister's department were predicated and relied upon an out-of-date 2010 Drysdale Clifton Springs Structure Plan. The intent of the DAL did not protect us as the draft SPP and other supporting documents had not been published for community engagement. **"Other residential areas across Drysdale and Clifton Springs are generally defined by larger lots and medium-high levels of vegetation in the private realm, including canopy trees"**². Could the above expectation have made a difference when determining the rezoning? Currently we are awaiting a response from VCAT in relation to the Oakden Road Proposed Development in Drysdale. Hence, our community sees the opportunity to be part of this consultation process as a very significant opportunity to be "protected" against such out of date Planning Policies. The Draft SPP supporting documents: *"The Settlement Background Paper"* and *The Bellarine Peninsula Township Character Assessment* still refer to the 2010 Drysdale Clifton Springs Structure Plan, which we believe is irrelevant to the area's contemporary development. In our view, unless the CoGG is mandated and provided with appropriate resources to instigate genuine community engagement to review this out of date Structure Plan, with a set timeline, our township will continue to have to deal with inappropriate infills within the established areas and thereby **"the town's relaxed, country-town feel, historic heritage, Aboriginal cultural heritage, environmental values of its parks, reserves and natural landscapes – its foreshore, farmland, lakes waterholes and views from the hills"**³ will be severely endangered. Over the last 18 months the CoGG has argued that policy development of the DAL process as one reason why they had not begun community engagement in relation to the review of the now significantly out-of-date 2010 Drysdale Clifton Springs Structure Plan.

REVIEW OF "LANGUAGE" & "TERMINOLOGY" IN ORDER TO INCLUDE ROBUST DEFINITIONS IN THE SPP

How does one interpret the following statement and the language applied to understand how such a decision was made? **"on balance it is preferable to support a well-designed residential intensification of an area close to a district town center, provided there is an appropriate provision of public space, vegetation and landscaping"**⁴. Without clear **legislated** provisions this non-quantitative language allows developers to move in and justify **overdevelopment**. As a result, our communities will continue to have the burden and stress of dealing with expensive presentations to VCAT or an Independent Panel to advocate against **urban development impacts**.

"the CoGG will need to consider the final Bellarine SPP in their role as planning authority"⁵. How and who will monitor and measure the outcomes? What timeline and resources will be provided to the CoGG to ensure genuine community engagement is carried out? We contend that these questions must be addressed as part of the SPP process. It is crucial that community consultation is sought and these issues attended to during the drafting of the SPP's Implementation and Planning Process

Confusion in the usage and comparison of terminology is another factor which in our opinion needs to be further clarified. **"Substantial change in the town (Drysdale) would likely resemble incremental change in urban Geelong"**⁶.

Recommendations

1. CLEAR DEFINITIONS & CRITERIA

- 1.1 Within the SPP Objectives and Strategies there must be **clear definitions** and **criteria**, together with quantifiable targets and/or criteria which **must** be met to ensure that **"open-ended interpretation of the intent of the legislation"** is minimal. Non-quantitative words such as **"balance"**, **"substantial"**, **"incremental"**, **"non-urban green breaks within townships"**, **"would likely"** and **"need to consider"** must be avoided.
- 1.2 Regardless of whether proposed changes are substantial or incremental, the onus on the developer **must be** to demonstrate via targets and criteria within their Planning application that it is meeting the expectation of **"Respecting the Township's Heritage and Landscape"**
- 1.3 It is imperative that the SPP Objectives and Strategies be provided with **measurable tools** and **compliance criteria** which would be legally binding. Furthermore, such finite expectations will foster transparency and strengthen compliance. This will to some extent address a very significant concern

expressed by our community in that **Objectives** are **binding** yet **Strategies** are **not binding**. Maybe there should be a broadening of Objectives given that this is the element which is binding.

2. **GREATER EMPHASIS GIVEN TO THE AREA'S CULTURE AND HERITAGE**

Drysdale/Clifton Springs is referred to as a Large Coastal town. Characterisation omits a number of significant aspects of the heritage and cultural significance of each individual settlement: - Drysdale, Clifton Springs and Curlewis. Though this significant aspect is somewhat covered in the Township Character Report, the community is of the belief that more should be made of these characteristics within the SPP document.

2.1 Significant features of Drysdale's Clifton Springs' and Curlewis' historical and cultural heritage should be included in Table 1 ***“Attributes qualifying Bellarine Peninsula declared area as a distinctive area and landscape”***.

Drysdale

McLeod's Waterholes have historic, aesthetic, scientific, social and cultural value not only to the Drysdale, Clifton Springs, Curlewis communities but the whole of the Bellarine. The publication *“The Waterholes A History of Drysdale on the Bellarine”* by Lynette Willey is one of a range of publications and historical books which documents the fact that the land adjacent to the Waterholes at what is known today as Drysdale was a cultural place for the Wathaurong. They populated the coast and sought sheltered areas during the winter months⁷.

For example., burials, artefact scatters, earth features and shell middens just to name a few. Corroborees were held near the Waterholes and the lakes provided bird life, freshwater fish and plants for nourishment.

There are also many examples within the Drysdale's town centre of Victorian-era architecture:

- The Drysdale Courthouse and Shire Offices: The first sitting of the Drysdale Court of Petty Sessions was held on April 6th 1859. It is now the home of the Bellarine Historical Society and Old Court House Museum.
- The Mechanic's Institute. This was established in 1868 and combined with the Public Library in 1880. It is now a Community Craft Shop.
- The Methodist Sunday School timber building is now the home of the Springdale Neighbourhood Centre.
- The Drysdale Assembly Hall of timber construction was built in 1884. The Drysdale Girl Guides and Boy Scouts took over the Hall in 1966.
- The Drysdale Post Office. Built in 1927, it currently houses a law firm.

There are other examples within the town boundaries of historic buildings, including:

- In 1991 the Bellarine Historical Society rescued the remnants of a cottage (Mimosa Cottage) and located in the parkland adjacent to the Drysdale Railway Station. The Title's Office documentation shows ownership from 1873. It is culturally significant because it is believed to be one of the earliest surviving structures in the Bellarine Peninsula. The Drysdale Station was built in 1879, now a private residence. In May 1989, a replica station building was constructed and the rail line reopened. Now a very popular tourist destination transporting day trippers between Drysdale and Queenscliff.
- In October 1st 1875 Drysdale State Primary School was completed. The School remains an important center of learning for our young. The original building is still in use.
- Crimea House established in 1891 to house the retired members of the British Imperial Forces. It was built for retired soldiers to see out their lives in a military style institution in the quiet rural village of Drysdale.

Clifton Springs

- The Historic Mineral Springs with its new boardwalk / viewing platform.
- The historic remains of the 3 derelict jetties.
- The Dell where William Buckley is believed to have interacted with the local aboriginal people.
- The scenic foreshore with its marine environment and snorkeling attractions.
- Green leafy residential areas with wide nature strips and canopy trees.

Curlewis

- Coriyule: Homestead built in 1843. A two-storey stone gothic homestead designed by Melbourne architect, Charles Laing. Home of lady squatters, Anne Drysdale and Caroline Newcomb.
- Wineries and rural scenic and bay vistas are a characteristic.

Clearly, our settlements are rich in history and heritage and they form part of the Settlement's neighbourhood character. These characteristics are highly valued and our community has been proactive in ensuring that they are documented and protected for generations to come.

2.2 We ask that Drysdale and Clifton Springs historical landforms and waterways, as well as, 19th century architecture be identified as features that must be protected and included in the SPP.

3. MORE SPECIFIC REFERENCE TO THE NATURE OF ANY ALLOWED INFILL SUPPLY

Table 7⁸ provides a guide on infill developments scenarios. As the Paper rightly acknowledges **“infill supply is difficult to calculate”**. The DCSCA believes that this table needs further breakdown.

The Curlewis Jetty Road Stage 1 & 2 development has very little if any opportunity to provide subdivision of existing lots. Therefore, these infills identified in Table 7 will realistically only occur within Drysdale and Clifton Springs.

According to the Bellarine Peninsula Township Character Assessment: Township Character Report (page 50): **“Infill development will be targeted in appropriate locations across established areas and will be designed to respond to the townships’ sense of pride in historic buildings, bay views and vegetation coverage”** **“New dwellings will be set within larger lots that retain existing vegetation in the public and private realm and include appropriate boundary setbacks”**. Unfortunately, this vision of future planning provisions has come too late to address the high-density development such as the current one being developed in Thomas Street Clifton Springs. However not too late for the proposed development in the one linked to the rezoning of C363. Unchecked infills in the established townships’ of Drysdale and Clifton Springs will indisputably add to the “urban heat island effect” (UHI) which up until recently our townships were relatively free off. UHI has been proven to have profound impact on human health, especially during heat waves.

This is an image taken from the C363 developer’s website looking from Drysdale towards Clifton Springs that shows the C363 site that has been recently rezoned from Rural Living Zone to Residential.



A biodiversity connection from McLeod Waterholes to the Bay passes through this site and there can be no doubt that the building of a minimum of 550 smaller-lot-size dwelling on this non-urban break will detrimentally and irrevocably change the character of our township.

3.1 If the Bellarine Peninsula Township Character vision is to be truly achieved, infills/developments cannot occur without appropriately limiting the population increase in each of the Drysdale and Clifton Springs settlements.

3.1.1 Any subdivision/development/infills in these two settlements must adhere to a formula where 30% of house blocks are between 300 m² - 400 m²; 30% to be from 400 m² - 600 m². The remainder 40% to be 600 m² - 700 m². This would still allow for housing diversity within infills but also protect the neighbourhood character.

3.1.2 All blocks have a caveat that they are unable to be subdivided once the land is acquired by a developer/builder or private individual.

3.1.3 Planning requirement that no residential lot may have building and hard surfaces occupying more than 60% of the land surface. This would allow for canopy trees and limit excessive storm water runoff that could increase the risk of flooding and pollute the bays marine environment.

3.2 Infills in Drysdale must not compromise its significant heritage characteristics, tree canopy, existing vegetation and English style Village Green ambience.

- 3.3 Infills in Clifton Springs should not put undue pressure on our significant geographical features, including natural landforms. The Dell, is such as an example of a significant geographical feature which the community believes must be protected. Erosion has had a big impact in this natural amphitheatre over the last 30 years, to the point that there is no longer car access to the beach and CoGG engineers have had to control its deterioration. Unchecked infills, of high-density building will increase population, increase stormwater run-off and reduce the amount and diversity of local flora and fauna.
- 3.4 Specifying detailed criteria which must be met by new housing developments/infills within the established settlements of Drysdale and Clifton Springs communities will allow for the retention of such significant environmental and landscape attributes.
- 3.5 Existing "Non-urban breaks" between settlements within protected settlement boundaries (e.g., between Clifton Springs and Drysdale) should be re-zoned Low Density Residential (this is a residential zone and specifies a lot size of at least 0.4 hectares in areas where reticulated sewerage is not connected or 0.2 hectares for each lot connected to reticulated sewerage.) instead of General Residential. Insisting on arbitrary minimum block sizes does not have any recognition in the planning process.

4. MORE EMPHASIS ON BIODIVERSITY AND ENVIRONMENTAL VALUES

- 4.1 The impact of unchecked infills and developments place undue pressure on the environment and in this instance, the quality of its natural waterways and aesthetic appeal township character and the ability to reserve these attributes for generations to come. We ask that these be included in the SPP **"Attributes qualifying Bellarine Peninsula declared area as a distinctive area and landscape"**.
- 4.2 Lake Lorne and Mcleod's Waterholes form part of a significant network for bird life, migratory birds and fauna. The upper lake in particular supports a diverse population of waterbirds including several which have special conservation status, including the Blue-Billed duck and Freckled Duck; and its shores slope gently so when the water level falls a border of bare mud is exposed, supporting important wader species. The larger lower lake provides an important role as a drought refuge for waterbirds and from hunting during the open season. The parklands that surround the lake include extensive grassed areas and stands of remnant vegetation, including River Red gums.

The City of Greater Geelong has been undertaking an on-going program of weed and exotic vegetation removal and complementing this with an active revegetation program using local indigenous species including River Red gum, Swamp gum, Blackwood and Manna gum. Apart from their **biodiversity and environmental significance** they are of **cultural significance**; they provide the community with the potential for much needed long term economic benefits of the tourist industry. In the **"Preferred Township Character Statement"** (Page 50) **"retaining existing vegetation"** has been identified as a vision element. It is pleasing to note that all trees are deemed to have an intrinsic value regardless of whether they are indigenous or not.

- 4.3 There should be a dollar value assigned to existing vegetation and trees when assessing planning applications. As well as an update on the CoGG tree register.
- 4.4 Native fauna need 'wildlife corridors' within townships if they are to survive and flourish, but infills without prescriptive criteria are more likely to create high density housing that reduces or removes such 'corridors'. It is imperative that semi-rural breaks within town boundaries are identified within the Objectives and hence preserved and protected in the SPP. Furthermore, there needs to be a policy to remove vermin pest species from the Bellarine to assist in the protection of wildlife corridors.
- 4.5 The Strategic Directions in the DELWP Discussion Paper identify the need to restrict urban development close to high value ecological areas and further acknowledges that connections between ecological areas are important and essential for native fauna migration and movement across and through the Bellarine. If this has any chance of being achieved there needs to be a prescriptive Action Plan directly linked to this Strategic Direction.

5. A CLEARER AND MORE PRECISE DEFINITION OF SETTLEMENTS

The image on the following page shows how the three settlements of Clifton Springs, Curlewis and Drysdale make up the proposed Drysdale-Clifton Springs protected settlement boundary. The biodiversity connections that run between Curlewis and Clifton Springs and through Drysdale are also shown in green.

5.1 The DCSCA believes that Clifton Springs, Drysdale and Curlewis are individual settlements with their own individual character that together make up our township. The historic non-urban breaks between the three settlements give our township a unique rural feel. DCSCA is concerned as to the risk of inappropriate smaller-lot-size development on what remains of these non-urban breaks (e.g., C363 and Oakden Road) and advocates that the individuality of the three settlements and the uniqueness of the township be clearly protected within the DAL legislation.

5.2 The DCSCA along with the Combined Bellarine Community Associations (CBCA) believes that the hierarchy designation of settlement must reflect the coastal nature of each of the Bellarine Settlements, retaining the unique character of each one. There is an urgency for the recalibration between current Planning and Structure Plans to accommodate the Bellarine SPP Objectives.

5.3 DCSCA believes that the legislation needs to clearly differentiate between what is a settlement and “protected settlement boundaries” and proposes changes (in red) to Table 2 on page 53.

Map 9: Proposed Drysdale–Clifton Springs protected settlement boundary

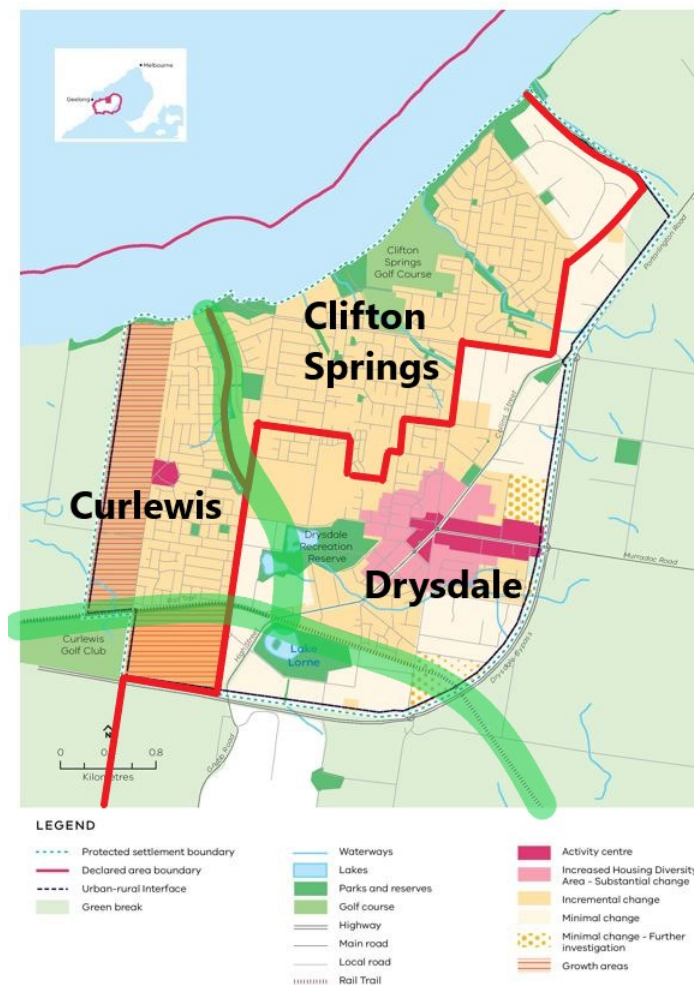


Table 2: Proposed hierarchy of Bellarine Peninsula declared area **protected settlement boundaries**.

Protected settlement boundary	Proposed hierarchy designation
Drysdale–Clifton Springs–Curlewis Leopold Ocean Grove	District township: an area within a protected settlement boundary providing a diversity of housing, services and employment for a large, diverse population, which has a strong relationship with surrounding villages and rural areas.
Barwon Heads, Indented Head, Point Lonsdale, Portarlington, Queenscliff and St Leonards	Village: a small ‘settlement area ’ with a small population, which integrates with its rural and natural surrounds.

5.4 The DAL legislation seeks to preserve the character of settlements and DCSCA recommends that this be achieved by an ‘urban edge’ treatment of what remains of the historic Rural Living Zone settlement breaks within the Drysdale-Clifton Springs-Curlewis protected ‘settlement area’ boundary. These to be ‘low density residential zone’ (LDRZ) areas. The Low-Density Residential Zone (LDRZ) is a ‘residential’ zone so is consistent with the recent rezoning. It specifies a lot size of at least 0.4 hectares in areas where reticulated sewerage is not connected or 0.2 hectares for each lot connected to reticulated sewerage.

6. **A GUARANTEE OF PROTECTED SETTLEMENT BOUNDARIES FOR 50 YEARS**

6.1 The message from communities across the Bellarine is clear and strong; we need to maintain and protect the existing town boundaries as a means of protecting and preserving the Bellarine’s Distinctive Areas and Landscape.

6.2 Prescribed town boundaries need to be guaranteed for the entirety of the 50 years and should not be part of any reviews of the SPP.

7. TOURISM DEVELOPMENT

Employment opportunities are very limited within the settlements and hence the majority of residents travel to Geelong or Melbourne for employment. Drysdale is a historic settlement and is an education, shopping, sporting, limited light industry and service hub for the Bellarine; Clifton Springs is a historic coastal settlement with wide nature strips and a Rural Living Zone.

Local tourism has grown significantly, offering new but limited employment opportunities. Tourist attractions include the wineries, the heritage rail and the lakes, together with our scenic foreshore with its safe beaches, the Clifton Springs Boat Harbour and its newly constructed Fishing Platform/Jetty, the Dell and recently completed boardwalk, the iconic derelict jetties and view of the You Yangs, the historical mineral springs and the golf courses.

To increase our township's attraction to tourists it must offer an experience that is significantly different and not just mirror imagines of Melbourne's suburbia. Unchecked infills/developments undermine the unique personality of our township, as well as impacting our ability to provide *"greater emphasis on the importance of a healthy environment and the environmental characteristics that support a successful visitor economy"*

- 7.1 In order for the tourism industry in our township to flourish we need to encourage visitors to stay longer than one day. Accommodation availability within our community needs to be addressed. This will bring long term employment and income to our area. A tourist attraction on the Curlewis waterfront is recommended.
- 7.2 Other factors needing attention in the development of local tourism are: access to coordinated transport; protection of the environment; safeguarding the distinctive attributes identified in the SPP; mindful of the Bellarine Peninsula's vulnerability to traffic congestion due to population increase and its bottlenecked road infrastructure system.

8. STRATEGIC INFRASTRUCTURE

- 8.1 Construct a comprehensive network of interconnected cycling and walking trails such that the Bellarine becomes an internationally recognised tourist destination for recreational walkers and cyclists. "THE BALLA WEIN WAY"
 - 8.1.1 A Bay Coastal Trail from Geelong to Portarlington to Queenscliff.
 - 8.1.2 An Ocean Coastal Trail from Torquay to Ocean Grove to Queenscliff.
 - 8.1.2 A Barwon River Trail from Geelong to Barwon Heads.
- 8.2 The Bellarine is a peninsula with a bottlenecked road infrastructure system. Its accessibility is also compromised by the location of Geelong at its entrance. This needs to be addressed in the SPP to ensure that the population of The Bellarine does not become too large so as to create excessive congestion to the detriment of both The Bellarine and Geelong.

CONCLUSION

In order for a vision to become a reality, initially, there needs to be collaboration, genuine commitment and ownership of that vision by all stakeholders. ***"governments, public land managers, Wadawurrung Traditional Owners, businesses, industries, residents, tourists and the community as a whole"***⁹. The second and crucial stage of the transition from a vision to reality is the **"planning and implementation process"**. Community engagement, clear and precise prescriptive objectives, set criteria and quantitative tools linked to these objectives will allow the vision to be delivered without ambiguity.

Implementation of the SPP into the various Planning documents is a major concern since there is no implementation plan in the SPP. It is imperative that as part of the SPP there should be an outline of an Implementation Plan containing key actions to be undertaken, who is responsible to lead the action, the timeframe the action is to be completed and the resources to be allocated to each action. The current DELWP Draft Marine and Coastal Strategy contains examples of setting implementation plans.

The residents in the Bellarine have made a conscious and deliberate decision to avoid urban city high density living. The Bellarine being declared a distinctive area and landscape we hope will protect our fundamental right to live in a semi-rural environment. Given the challenges which COVID-19 has thrown at us we know that our community's health, resilience and well-being have benefited from our open spaces, safe beaches, generous backyards, proximity to nature, and a sense of neighbourhood.

The following link provides significant evidence to support this statement. <https://www.abc.net.au/news/2021-08-13/covid-lockdown-mental-health-and-anxiety-depends-on-housing/100369398>

The DCSCA supports the recommendations included in the Bellarine Community Health SPP submission. Specific attention to recommendations 3, 6, 7, 8, 11, and 14.

The DCSCA submits our proposals and feedback in good faith and would be happy to expand or clarify any issues with DELWP.


Drysdale Clifton Springs Curlewis Association President

Footnote details:

- 1 Ethos Urban, (July 2020) Bellarine Peninsula Township Character Assessment; Township Character Report, Page 44
- 2 Ethos Urban, (July 2020) Bellarine Peninsula Township Character Assessment; Township Character Report, Page 44
- 3 DELWP, (June 2021) Draft Bellarine Peninsula Statement of Planning Policy: Settlement Background Paper, Page 65
- 4 DELWP, (June 2021) Draft Bellarine Peninsula Statement of Planning Policy: Settlement Background Paper, Page 81
- 5 DELWP, (June 2021) Draft Bellarine Peninsula Statement of Planning Policy, Page 15
- 6 DELWP, (June 2021) Draft Bellarine Peninsula Statement of Planning Policy: Settlement Background Paper, Page 76
- 7 Lynette Willey, (2010) The Waterholes: A History of the Drysdale on the Bellarine, Publication: Bellarine Historical Society Inc. Page 6
- 8 DELWP, (June 2021) Draft Bellarine Peninsula Statement of Planning Policy: Settlement Background Paper, Page 32
- 9 DELWP, (June 2021) Draft Bellarine Peninsula Statement of Planning Policy, Page 15