

**PUBLIC CONSULTATION SUBMISSION**  
**DRAFT BELLARINE PENINSULA STATEMENT OF PLANNING**  
**POLICY**  
**ON BEHALF OF GANDRA PTY LTD**



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**INTRODUCTION**

1. St Quentin has been commissioned by our clients Goandra Pty Ltd to provide a submission on the Draft Bellarine Peninsula Statement of Planning Policy. Our clients are the developers of Goandra Estate -located to the north-west of the Ocean Grove Township, north of Thacker Street and is within the Special Use Zone Schedule 8 which is essentially a Low Density or Rural Residential Zone. Goandra Estate was within the Ocean Grove Structure Plan 2007 (OGSP07) existing settlement boundary. Our clients are also in possession of four lots immediately to the north and north-west of the Goandra Estate being the remainder of PC715047 (adjacent to the west of the Nature Reserve), PC368635, and TP874767 and TP224729 (adjacent to Wallington Road). These lots are within the Farming Zone and the OGSP07 identified these lots within the long-term settlement boundary.

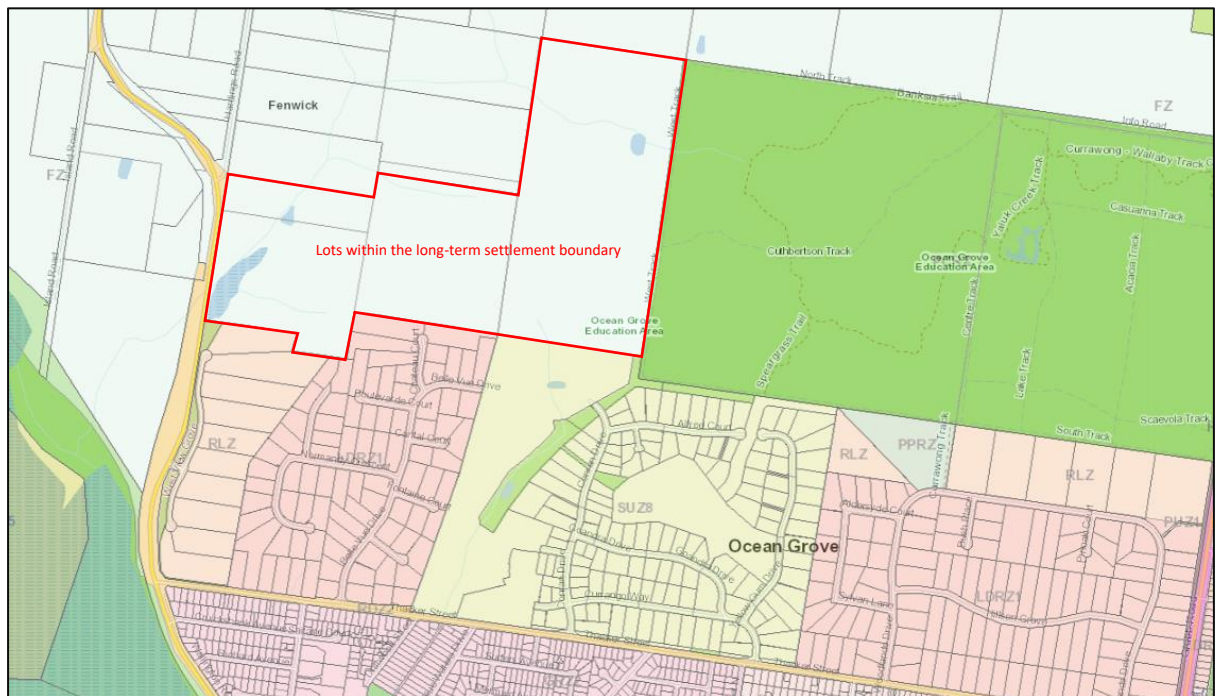


Figure 1: Goandra Estate is within the SUZ8. Other land owned by Goandra Pty Ltd is shown marked within the Farming Zone.

**CHANGING APPROACH TO OCEAN GROVE’S SETTLEMENT BOUNDARY**

- The bulk of recent growth in the Peninsula is being concentrated in three townships – Leopold, Ocean Grove & Drysdale/Clifton Springs. For the last twenty years, Ocean Grove has been the largest of the three, funnelling much of the Peninsula’s growth.

The approach to Ocean Grove has remained fairly consistent throughout this and at times this has included existing and long-term settlement boundaries. Ocean Grove’s development has always been framed as a balance between supporting its residents and the wider Bellarine environment. The OGSP07 best summarised this as an approach which needs to “*preserve opportunities for town expansion whilst balanced with the appropriate protection of the environmental and landscape features of the land located on the periphery of the town. The land available for urban growth within the long term boundary will be constrained by landscape and environmental factors including the need for a sensitive interface with the Ocean Grove Nature Reserve and significant coastal landscapes limiting growth to small, well planned and interconnected nodes.*”

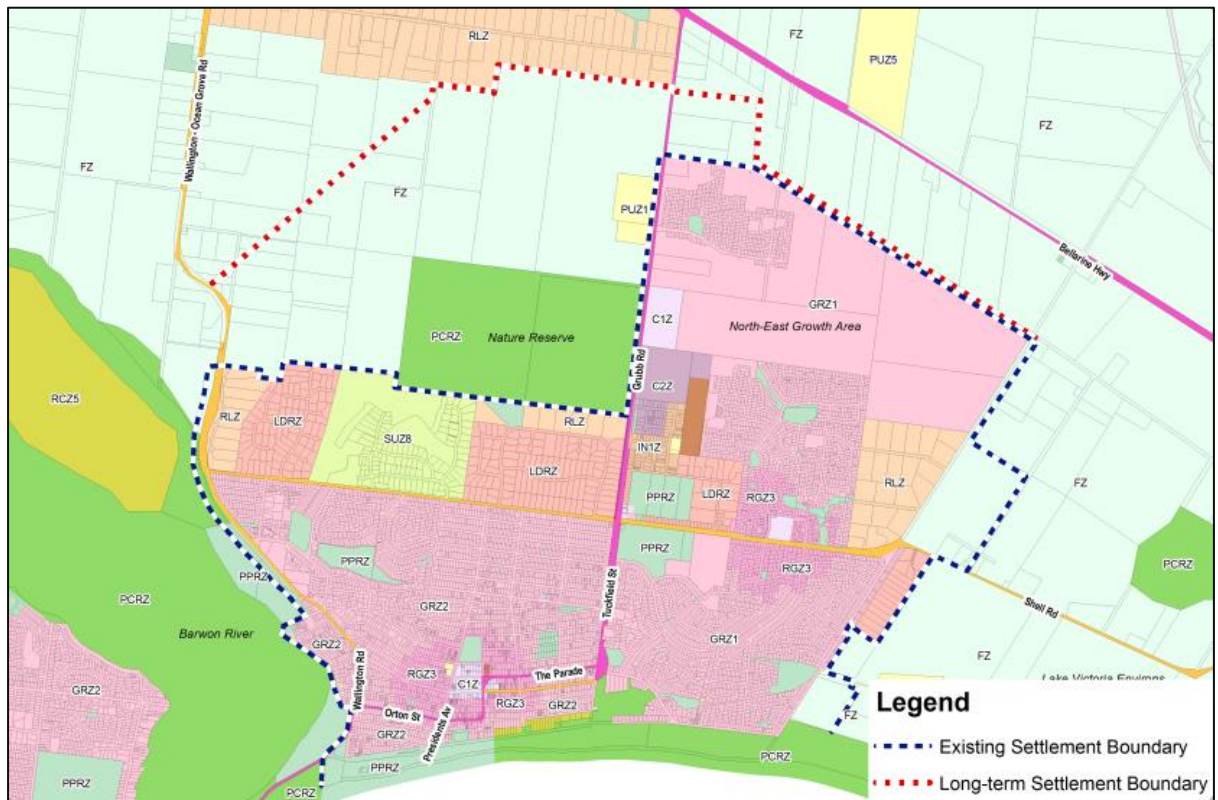


Figure 2: Ocean Grove Settlement Boundary (2007) showing existing and long-term boundaries.

**EMPHASIS ON DAL TO RIGIOUSLY REVIEW THE SETTLE BOUNDARY**

3. Recently there has been a refocusing of long-term growth away from the Bellarine Peninsula as a conscious policy decision of both Council and the State Government. The Draft Bellarine Peninsula Statement of Planning Policy attempts to do this with the use of a 'Protected Settlement Boundary'. This type of settlement boundary requires an Act of Parliament to amend.
4. The City of Greater Geelong – Settlement Strategy (August 2020) was able to analyse how Greater Geelong will continue to house future population growth. It found support for shifting residential growth away from the Bellarine Peninsula. The Settle Strategy provided a framework for how future settlement boundaries could be implemented. However, Council supported the Panel's view that although *"the Settlement Strategy provides policy direction towards permanent settlement boundaries, it was not the intent of the Amendment (C395) to define a long term or permanent settlement boundary. That would be done by the DAL for the Bellarine and a logical inclusion process for urban Geelong.*
5. The Panel reinforced this in C395 by stating *"the process to define the long term or permanent settlement boundary should be robust, transparent, evidence-based and start from existing structure planning in the planning scheme"*. They concluded saying the *"DAL process would seem to be the logical process to undertake this exercise as defined by the Planning Panel report for C395."*
6. The DAL process was indicated as the proper forum for consideration of specific settlement boundaries. Both Council and the wider community anticipated that the DAL process and statement of planning policy on the Bellarine would resolve both these matters and would satisfy the 'logical inclusions' identified within the Amendment (C395).
7. The DAL's approach of simply 'carrying over' the settlement boundary from the COGG Settlement Strategy (2020) fails to consider the context of the Panel's recommendations and is unfairly dismissive of other planning considerations.
8. Ocean Grove as a key town within the Bellarine Peninsula has not been afforded a rigorous approach despite previous planning experts flagging the area's diminishing housing availability.

#### **OCEAN GROVE HALF CENTURY VISION**

9. Ocean Grove's share of the population has increased substantially in the past year. The 'shift to the regions' has accelerated with a significant increase in the permanent population normally not associated within coastal towns. It is still unknown if this trend will be sustained into the medium term. But if this growth is disregarded & underestimated, the result will be inadequate housing supply and declining housing affordability, infrastructure shortfalls and potentially rushed and reactive decision-making to cater to the unexpected growth.

10. It would be naïve to expect that an appropriate 50-year vision could be founded on the limited information currently considered, let alone address the social, environmental, and economic factors that will define Ocean Grove over the coming half-century.
11. The C395 amendment’s implementation plan instilled confidence of due process to submitting parties, with the recommended strategic work (for the preparation of the boundary review) noting that the following should take place; *“consideration of the land to the north, north-west and east of Ocean Grove; the role of Ocean Grove as a district town; other planned growth on the Bellarine Peninsula and development trends, lot supply and housing capacity within the settlement boundary.”*
12. The Ocean Grove Structure Plan 2015 (OGSP2015) and corresponding Amendment C346 did not provide the robust review that Planning Practice Note 36 (Implementing a Coastal Settlement Boundary) requires including substantial demographic, economic and environmental, constraints, infrastructure, financial or political evidence. Thus far, there has been no preparation of important strategic work, with the 2015 Ocean Grove Structure Plan review and the Settlement Strategy both deferring this work on to the next strategic reviews.
13. DELWP’s current approach to implementing a ‘Protected Settlement Boundary’ by simply using old structure plan information that is not robust or evidence based is poor planning.
14. The concerns of settlement boundaries by the community were foreseen during C395 Planning Panel but have continued to be ignored by the responsible authorities. The panel attempted to instil some confidence in due process declaring it would be *“neither fair, nor sound planning, to ‘shut the gate’ at a particular point of time without a logical review of what is inside or outside the paddock at the point in time when the gate shuts.”*

#### **ADDRESSING AN INABILITY TO COMPLETE THE NECESSARY STRATEGIC WORK AS PART OF THE DAL**

15. If DELWP is unable to provide the strategic work necessary to complete a robust review of the boundaries in the peninsula as recommended in the Panel Report of C395, then It would be more appropriate to declare the long-term boundaries as unresolved at this point in time. DELWP should direct the City of Greater Geelong to determine long term boundaries via a separate consultative process for the Bellarine Townships.
16. Alternatively, an approach introducing a settlement boundary without necessarily introducing a ‘permanent’ boundary would be more appropriate. As such, this would provide capacity for further investigations to occur and allow flexibility in line with local context while applying the landscape

significance that would continue to determine the town's surrounds. This tailored approach to Ocean Grove would be most appropriate to address the unique intricacy of the town.

**CONCLUSION**

17. This submission is requesting that DELWP does not lock in the current settlement boundaries without either DELWP or Council completing a robust analysis of the land demand and supply for Ocean Grove. DELWP has provided no clarification about why the protected settlement boundary is appropriate with regards to the social, environmental, or economic context of Ocean Grove and is potentially compromising the town's future.

Regards

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