
I thank you for the opportunity to provide feedback on the Draft Bellarine Peninsula Statement of Planning Policy.

1. About us

This submission reflects our interests, experience and concerns as residents of Clifton Springs, and also as owners and operators of the business Bellarine Care Services, established in 2018. Bellarine Care Services provides in-home support and personal care to vulnerable older people and to people with a disability who live in the Bellarine community. Our work assists these people to continue to live independently in their own homes.

2. Planning must recognise and counter the problem of social isolation of older people

- 2.1 Despite some increased housing supply from new housing developments, demand for housing in the Bellarine area is very high and housing is very highly priced. This is particularly the case in those localities which the Draft SPP has earmarked as the villages to be the most protected with least (minimal) housing change. It is no coincidence that these areas are the least affordable and have the highest ratios of absentee owners, that is, those people who can afford a permanent dwelling elsewhere as well as a secondary property in one of the most highly priced localities in the Bellarine area.
- 2.2 The draft SPP proposes that localities in the Bellarine be assigned to one of three housing change categories – minimal change areas, incremental change areas or substantial change areas. These designations allow the most protection to the minimal change areas, which are the localities with the most highly priced properties and the highest ratio of holiday residences to permanent dwellings. Heritage and landscape combine to attract visitors and holiday makers. There is a significant number of dwellings in localities such as Queenscliff, Barwon Heads, Indented Head and Portarlington which are vacant except for holiday periods. The areas with the highest proportion of absentee owners (that is, those who are wealthy enough to afford a second residence) are those that the SPP seeks to give most protection from threats of over-development.
- 2.3 The nature of our work means that we commute daily throughout the Bellarine area and we are familiar with the characteristics of its different localities. We are very aware of the concerns of older residents who wish to continue to live in their own home and enjoy the amenity in the Bellarine area. They experience an increasing sense of marginalisation from the localities they have lived in for many years, due to the markedly different characteristics of the new societal groups attracted to the area as new residents or as seasonal tourists.
- 2.4 The people we support are overwhelmingly long-term residents of the Bellarine peninsula who have strong affinity and familiarity with the local area, and who highly value their neighbourhoods, social networks and the local environment. Many of

those who live in popular tourist destination localities, such as Barwon Heads and Portarlington, are conscious that a high proportion of the properties neighbouring theirs are owned by absentees who are generally younger and who live and work elsewhere. As a result, the older local residents experience a loss of social connectedness and they feel vulnerable as they may not have resident neighbours, and they observe that short stay visitors have little interest or opportunity to interact with them.

- 2.5 Planned additional housing developments must accept that they have a responsibility to enhance community connectedness. Developments must work collaboratively with existing organisations to provide appropriate increased support to achieve this, by providing resources for ongoing key fixtures, events, activities, newsletters, 'welcome packs' for new residents and meeting venues. Community organisations and associations need to be bolstered to provide more and broader opportunities to appeal to the range of residents and visitors, and developers must assist in this provision. Tangible contributions might entail upgrading facilities for local community organisations and contributing to operational costs of these community entities.

3. Planning policy must recognise and address the social divisions being exacerbated by high house prices in the Bellarine area

- 3.1 In the course of our business activities, we have been made very aware that there is a dearth of care and support service workers in the Bellarine area. The Bellarine peninsula has the highest proportion of older people relative to other age groups than any other local government area in Australia. As a group, older people have the highest need for assistance to enable them to live independently at home. Although they may be longstanding homeowners, many older people in the Bellarine area rely on income from the aged pension and subsidised services to assist them in activities of daily living so that they may continue to live in their own homes. Yet in the Bellarine area, it is extremely difficult to source local support workers to assist them. In-home support workers engage in home visiting to provide a short service, and there is a low hourly rate for this sort of work. The work is necessarily of a part-time nature, as workers need to travel from client to client, and clients tend to require services in the early morning or in the evening, so it is difficult and rare for workers to be assigned full work days with continuous hours. Additionally, it is hard for low-paid staff living outside the area to afford the time and expense involved in travelling from Geelong or elsewhere outside the Bellarine peninsula to service clients living in the area, particularly those in the western parts of the Bellarine. The necessary road works which have been conducted in the last five years to enhance the major arterial roads have had the effect of slowing traffic flows, intensifying this problem. The aging population is requiring more service workers, and that work is being undertaken by commuters living in more affordable suburbs, putting more stress on the main roads. Purchasing or even renting property in the Bellarine is simply not affordable for people who have to support themselves through part-time low-paid work.

- 3.2 The long-standing inherent attractiveness of the area to visitors and potential residents has inadvertently increased over the last 18 months, as the area has been viewed as a potential haven from the concentrations of COVID-19 outbreaks which have clustered in the Melbourne area. This has further fuelled speculative activity on the part of developers. House prices on the Bellarine have surged in response to market demand, and accordingly this price surge has prompted some owners of larger landholdings to offer their properties for sale at unprecedented prices.
- 3.3 As a result, despite existing planning zone provisions, developers are marketing significant parcels of farm land in the Bellarine area as 'land banking' opportunities. While there may be no immediate activity in contravention of current zoning, the intent is clear: developers are investing in the area to exploit its potential for future profit maximisation. Every new residential estate on permitted township fringes leads to the increase in value of hinterlands. Real estate dealers are now calling for new developers with a view to establishing future estates beyond existing town boundaries. As ownership of significant land parcels carries economic and political influence, this has the potential to steamroll any aspirations to control development and balance conflicting interests.
- 3.4 With such strong interest and investment in future development in the area, it is essential to buttress zoning provisions to control and manage land use. The township boundaries and zoning restrictions must be clearly stated and upheld by legislation. Zoning information and restrictions must be incontrovertible, readily accessible and legally enforced.

4. Legally enforceable mechanisms are needed to ensure adherence to SPP objectives and offset economic and political pressures to develop

- 4.1 The Draft SPP seeks to reconcile this conflict between the goal of preservation of amenity and the interests of development by a process of controlled and responsible implementation of its objectives, outlining strategies for this to happen. However, the strength of the forces gathering to undermine these objectives is such that the SPP needs to have clear and binding procedures in place.
- 4.2 The Draft SPP acknowledges the importance of requiring all involved responsible parties to adhere to its objectives and strategies for preservation of the area's distinct values and attributes. It sets out a series of aspirational statements to guide development for the next 50 years, asserting that future growth in each of the Bellarine localities will be 'carefully managed' through matching a mix of preferred strategies (e.g., confining growth to infill within protected town boundaries, requiring key aesthetic characteristics, and greenfield development) to particular townships and localities.
- 4.3 The high level of tourist traffic and issues of over-development are already very apparent to us and to our clients in different localities in the Bellarine area. For example, in relation to Barwon Heads, which the Draft SPP proposes to designate a minimal change area, it should be noted that pre-pandemic, this area was already

evidencing major disruption to its traffic flow during holiday periods. 'Lollipop' traffic controllers were regularly required on weekends and public holidays to police the Bridge Rd (C121) pedestrian crossing, as traffic banked up before this bottleneck. This highlights the urgent need for emergency evacuation planning and a community awareness campaign for the township, given the potential for bushfire and other climate change impacts. It is not only the local resident population who would need to be assisted to evacuate in such emergencies, but also temporary residents unfamiliar with the area. Designating this area as one of 'minimal change' makes little sense when there is a need for better traffic flow and accessible exit routes. This proposal only makes sense as pandering to a monied elite, not as sensible town planning.

4.4 The Draft SPP presents very admirable principles in setting policy objectives for the next 50 years, but the strategies it advances to achieve them offer no assurance of the achievement of those objectives. The Draft SPP envisages that the implementation of the final Statement of Planning Policy will rely upon the Borough of Queenscliffe and the City of Greater Geelong to integrate it into their planning schemes, and that responsible public entities will be bound to observe the objectives of the SPP, and although not bound to recommended strategies, must have regard to them. It is not clear from the Draft SPP how these entities are to account for their actions or inactions. This needs to be clarified. It could be that each public entity already has a charter which has established a consultative process, but this needs to be stipulated as a binding requirement, so that the consultative process is meaningful and residents are allowed to influence outcomes. A 'public information session' is not 'consultation'. Residents are discouraged by forums where the public is told about decisions affecting the community after the decisions have been made and acted upon. Similarly, residents of the Bellarine area are concerned that they do not have a strong enough voice on the City of Greater Geelong council. The distribution of councillors on the council of the City of Greater Geelong means that even if the local representatives for the Bellarine act together and vote as a bloc, they can and regularly have been outvoted by other councillors, because the majority of councillors live outside the area.

4.5 The Draft SPP identifies in some detail the challenges confronting planners in balancing interests and in managing growth while upholding the value of heritage, environment and economic development. Given this awareness, the SPP must set out more clearly the practicalities of how the planning process is to withstand economic and political pressures pushing for development.

5. Mechanisms are needed to engage and empower communities in planning decisions

5.1 The Draft SPP states that the outcomes of the implementation of the policy objectives will 'provide greater certainty for current and future residents and businesses' (p. 16) but it does not detail how this is to happen. Residents may justifiably be concerned that the planning process remains subject to nebulous

broader political and economic influences which may prevail over less well-resourced social, environmental and community interests.

5.2 The framing of the Draft SPP currently subordinates residents' interests in the planning process. One example of this is provided in the way in which the Draft SPP proposes future reviews of the planning policy. The Draft SPP envisages reviews, to be undertaken at no longer than ten-year intervals, to be undertaken collaboratively between governmental and responsible public entities, but community consultation seems to be presented as something of an afterthought:


The review will be conducted by the Minister for Planning in collaboration with the Borough of Queenscliffe, the City of Greater Geelong, Wadawurrung Traditional Owners and relevant government agencies and in consultation with the Victorian community. (p. 17)

The inference is that 'the Victorian community' (note, the broader Victorian community, not especially the residents of the Bellarine localities) will be consulted, but have little influence.

5.3 Truly effective collaboration with the community requires the commitment of all responsible public entities to acknowledge and conduct their duty of care:

- to enable residents to understand the role and processes of each RPE,
- to seek endorsement from residents' associations of RPE policies and procedures, insofar as they relate to land use planning,
- to engage, inform and include residents in the planning and conduct of RPE duties, and
- to encourage and support residents to provide relevant input so that RPEs are informed of, reflective of and responsive to community interests and experience.

5.4 A process to encourage relevant, informed and meaningful community input, which respects and values that input and which integrates residents' views into the planning process, is necessary to achieve the Draft SPP's implementation goal to 'provide greater certainty for current and future residents and businesses' (p. 16).


Bellarine Care Services
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