

# St Quentin

**STQC REF:16636**

21<sup>st</sup> August 2021

## **Distinctive Areas and Landscapes Program – Bellarine Peninsula**

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

To whom it may concern

**RE: St Leonards**

Our client, [REDACTED] has interests in St Leonards, both in land currently approved for development and being developed, and also in land which may have future potential for development.

The latter parcel, that is land not currently within the settlement boundary, but which may have strategic value for future growth, is shown in white in the figure below. It is known as [REDACTED]

Whilst no detailed investigations into the site have been undertaken, there are no obvious constraints of the site to future development.

The intent of this submission is not to put forward the subject land for inclusion within the settlement boundary. It is to ensure a robust and evidence-based approach to determining the long term settlement boundary for St Leonards

Please note that;

- The commentary in this submission should be considered as applying to St Leonard's and its surrounds only. The DAL process, as under taken in this case may be completely suitable for other townships and their individual circumstances and landscape contexts; it is submitted the process as it relates to St Leonards is flawed, and further review is necessary.
- The appended Hansen Partnership memo is a review of the DAL SPP and landscape technical assessments, as they relate to this submission and should be read as part of this submission.

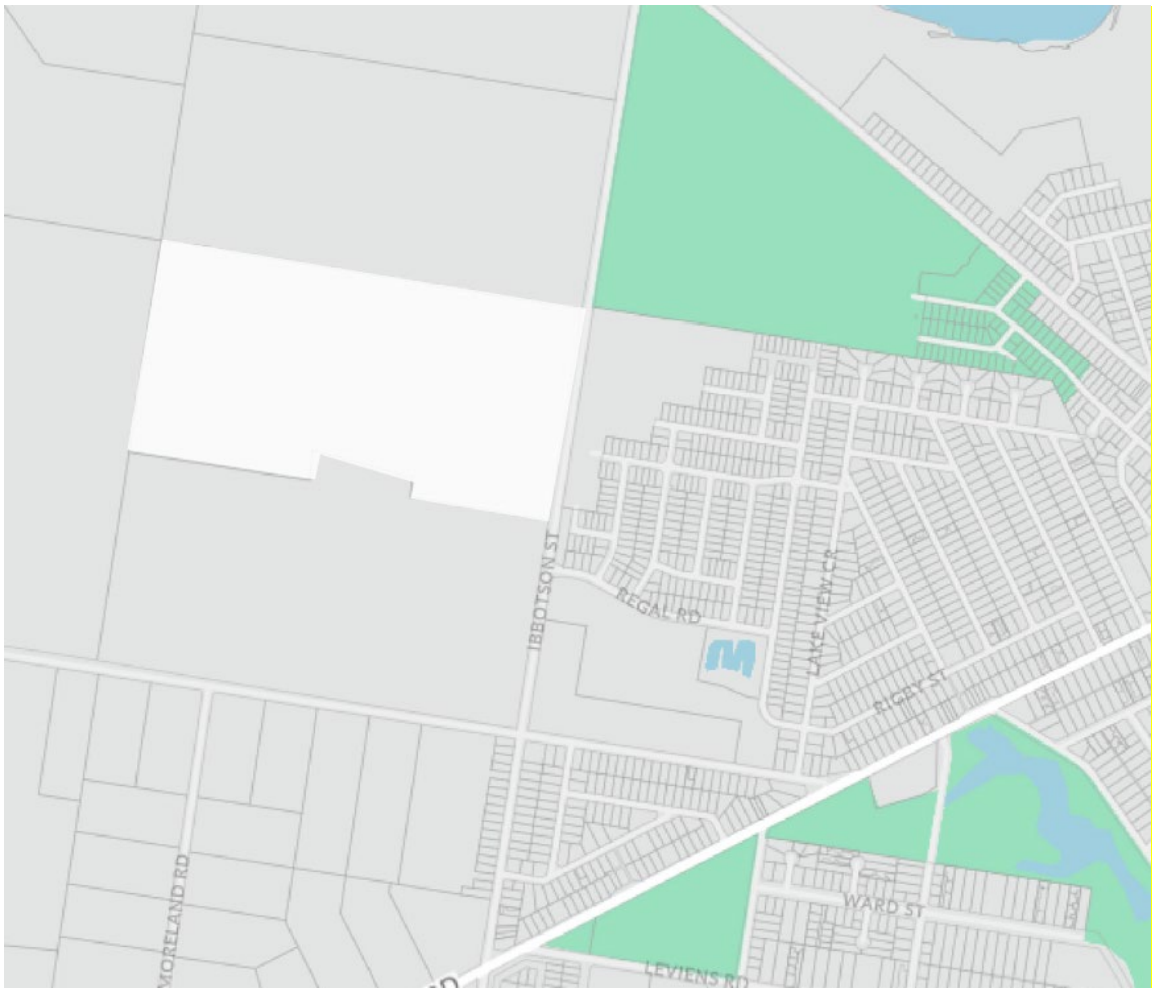


Figure 1 Subject site



## Background

The role of the DAL project, in relation to the declared area framework plan is outlined in Section 46AT of the Planning and Environment Act 1987. In particular, Section 46AV(2) states (emphasis added);

*The declared area framework plan must provide a framework for decision-making in relation to the future use and development of land in the declared area that—*

- (a) integrates environmental, social, cultural and economic factors for the benefit of the community and encourages sustainable development and identifies areas for protection and conservation of the distinctive attributes of the declared area; and*
- (b) may specify settlement boundaries in the declared area or designate specific settlement boundaries in the declared area as protected settlement boundaries.*

The role of settlement boundaries was subject to much discussion at the Panel Hearing for Amendment C395 Settlement Strategy. In the C395 Settlement Strategy and associated Panel Hearing;

- a. DELWP stated that the DAL would be the opportunity to review settlement boundaries.
- b. C395 Panel recommends there were 3 opportunities for review of Settlement Boundaries; the DAL process, a logical inclusions process, or review of existing structure plans. It recommended the Settlement Strategy be refined to articulate this.
- c. Council advised that its preference was that the DAL should be the vehicle for further work in interrogating the settlement boundaries; if not, further work should be preserved such as what occurred in Macedon Ranges.
- d. Council also considered the DAL process must be undertaken before detailed review of structure plans.
- e. Council submitted that the DAL process for the Bellarine will satisfy the 'logical inclusions' identified within the C395 in so far as it relates to the Bellarine.

Panel recommendations into this matter were as follows (emphasis added);

*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.*

*The DAL process would seem to be the logical process to undertake this exercise. Where additional strategic investigative work is required to inform the final township boundary, the DAL could adopt the tailored approach to settlement boundaries used in the Macedon Ranges SPP, and the detailed structure planning be undertaken within the DAL SPP.*



## Setting Settlement Boundaries

There are many elements to consider in setting a settlement boundary. A number of these are nominated in the Planning Practice Note 36 *'Implementing a Coastal Settlement Boundary'*. These issues would typically be considered in either preparing a Structure Plan, or reviewing a Structure Plan, and comprise of;

- A desired future vision for a settlement
- The role and function of the settlement in comparison with other settlements within the region
- The performance of existing Structure Plan.
- The constraints on development such as topography, native vegetation, rural land-use activity and areas of environmental or landscape significance and sensitivity
- Areas with susceptibility to flooding (both river and coastal inundation), landslip, erosion, coastal acid sulfate soils, salinity, wildfire or geotechnical risk
- Supply/demand of land within a 10 year planning horizon and opportunities for future growth (if any).

Council's Settlement Strategy includes its expectations of how settlement boundaries or logical inclusions might be considered. These include;

- land that: supports an enduring and robust long term boundary, assists infrastructure provision to land already identified for residential development and is contiguous with an existing urban area.
- confirming the appropriateness of current boundaries for urban Geelong and district towns on the Bellarine Peninsula (no changes to other towns)
- a consultation and submissions process
- referrals to infrastructure and service agencies
- independent oversight and
- consultations with the Minister for Planning
- Land must deliver a benefit to existing or identified residential land/development through for example more efficient infrastructure provision or utilisation.
- Land must be able to rely on existing facilities and services and not create the need for additional or new community infrastructure or significant council investment that would be required for a new residential node.
- The suitability for urban development should consider:
  - flooding risks, climate change, environmental issues including acid sulphate soils;
  - accessibility, including the feasibility and cost of providing adequate public transport and roads access;
  - impacts of any proposed boundary changes on the economic provision of other development fronts;
  - urban services including both utility and community services.
  - impacts of any proposed changes on the establishment of logical and enduring settlement boundaries;



- physical boundaries including consideration of natural features, location of major roads and reservations for public utilities; and
- potential impacts on significant existing non-urban land uses and activities including agricultural, activities, extractive industry, sensitive land use buffers, tourism and other established and valued land uses.

In this case, in setting 'protected' settlement boundaries the DAL proposes a 50-year time frame. In these circumstances it is critical that the level of investigation and review is significant and robust.

Whilst some of the relevant matters above have been considered in Council's Settlement Strategy, many have not.

### **What the DAL project has properly considered**

The DAL process, in terms of settlement boundaries, has effectively taken the direction provided by Council's Settlement Strategy both in relation to the hierarchy of towns, and also in relation to the view that urban growth should generally be directed away from the Bellarine Peninsula.

Using this as a point of commencement, in terms of the settlement boundaries and townships themselves, the DAL then appears to have simply adopted the boundaries set in existing Structure Plans, without for example;

- Review of the Structure Plans in terms of performance;
- Consideration of changes in circumstance and context since Structure Plan preparation;
- Consideration of what the Settlement Strategy means for these towns.
- Consideration of future influences over the next 50 years and any flexibility in policy needed to address these.

The DAL has also been informed by detailed landscape assessment. This landscape assessment however, in the case of St Leonards, has provided no evidence that the settlement boundary is informed by landscape values. Appended to this submission is a review of the landscape element of the DAL by Hansen Partnership. The findings of that review are essentially that;

- There is no clear justification for the classification of the land to the west of St Leonards – including the subject land at [REDACTED] – as a regionally-significant landscape;
- There is no clear justification for excluding this land from consideration for future residential use via the application of a Protected Settlement Boundary.
- The land to the west of St Leonards, including the subject land, does not exhibit the 'distinctive landscape features' referred to within the *Bellarine Peninsula Draft SoPP* and is acknowledged as having a low level of visual exposure relative to its surrounds.

### **What the DAL project has not done**

The DAL has not undertaken any review or assessment of the existing Structure Plan, whether it is delivering on previous policy objectives, whether it is capable of delivering on current policy objectives, what impact the recent and sudden growth of St Leonards has had on the nature of the settlement and the need for services and infrastructure. None of these matters have been properly considered.

As background it is instructive to review policies relating to St Leonards, and how they have played out. This demonstrates the high rate of change which can occur as a result of demographic, cultural and social changes, and illustrates a need for either comprehensive investigations into these matters, or the flexibility in policy to deal with these issues moving forward.



The St Leonards Structure Plan was prepared in 2014 and at that time the land supply for land within the proposed settlement boundary was considered to deliver between 18 and 33 years – see extract below from the C312 (St Leonards Structure Plan) Panel Hearing;

**Table 1 Land Supply Analysis**

	2014 Structure Plan Assessment	Ainsaar Assessment	McNeill Appraisal of Structure Plan approach
Existing lot supply	<b>523 lots</b> (333 existing lots +190 broadacre lots)	<b>430 lots</b> (292 less 20% = 185 +245 broadacre lots (Updated))	<b>491 lots</b> (246 +245 (Updated))
	<b>Panel comment:</b> Note updated broadacre lot supply of 245. Agree that the number of existing vacant lots should be discounted as all lots are unlikely to be made available for development, particularly in a small holiday town with low occupancy rates, such as St Leonards.		
Annual lot take-up	62 lots (10 year av. 2003-13) 88 lots (2010/11 peak)	60 – 75 lots (noted land release increased take-up).	Supports Council approach
	<b>Panel comment:</b> Note consistency in take-up rates and agree with consensus in experts' view that supply and external factors are likely to have a significant effect on demand and take-up rates in St Leonards.		
Existing land supply	<b>4 – 9 years</b>	<b>6.4 - 8 years</b>	Supports Council approach but notes it is conservative
	<b>Panel comment:</b> Note the consistency between Council and expert assessments.		
Land supply with Growth Areas 1 & 2	<b>25 – 33 years</b>	<b>18 – 23 years</b>	<b>25 – 33 years</b> Supports Council analysis noting it is conservative.

*Figure 2 Except from C312 Panel Report*

Post adoption of the St Leonards Structure Plan, two rezonings in areas known as Growth area 1 and Growth Area 2 were undertaken and completed in 2017. Since that time, the level of both demand and supply has been dramatic and the supply anticipated by Amendment C312 has essentially been exhausted.

That is, supply which was expected to provide between 18 and 33 years of growth has been largely exhausted in 4 years

This level of growth has obviously brought significant change to St Leonards. Among the likely changes not explored by the DAL project are;

- Changing demographic profile
- Increased population
- Suitability and capability of services
- Suitability and capability of infrastructure.

### Importance of investigation

The DAL project, as outlined above, appears to have undertaken very little investigation into the issue of St Leonards, whether it be into;

- Landscape values where the relevant report suggests additional investigation/detail is required (see appended Hansen memo);

- Settlement boundary, where the boundary itself and the Structure Plan appear to have been subject to no investigation at, despite significant and dramatic change to the settlement since the Structure Plan in 2015.

This approach may be useful and warranted in some circumstances. It is without question however, an insufficient level of work and therefore knowledge on which to base a settlement boundary for 50 years.

Bearing in mind the DAL project intends essentially to lock this settlement boundary in place for 50 years, any relevant investigation should, in the words of the Panel for amendment C325 be robust, transparent and evidence based. The DAL project is clearly none of these, as it relates to the St Leonards settlement boundary.

It is reasonable to posit that there are 2 possible approaches to this issue. The first is to undertake detailed, robust and evidence-based investigation of the relevant issues, and inform future policy rigorously on this basis. The alternative is ensure policy is flexible enough to accommodate this level of investigation at an appropriate and useful time to do so.

Given that the first option has not been pursued, perhaps due to the time constraints on the DAL process, the second option should be now the preferred approach in order that such an important planning policy, which locks settlement boundaries for 50 years, is properly informed.

### **Macedon Ranges experience**

The Macedon Ranges SPP sets protected settlement boundaries for those townships where sufficient investigations/structure planning has taken place so that this nomination was properly informed.

**In the case of towns where that work had clearly not been undertaken to a sufficient level to inform a protected settlement boundary, the SPP effectively sought to facilitate addition work on those towns and structure plans, as the excerpt from the Macedon Ranges SPP shows'**

*Long-term settlement boundaries will be determined for Gisborne and Romsey as part of the review of the Gisborne/New Gisborne Framework Plan and Romsey Structure Plan that form part of clause 21.13 – Local Areas and Small Settlements of the Macedon Ranges Planning Scheme. In the interim, the current plans will provide sufficient direction to guide strategic planning until these reviews are completed and settlement boundaries are determined in the next 12 months.*

In terms of current policy;

- The St Leonards Structure Plan map is included in Clause 21.14-5
- The St Leonards Structure Plan is a reference document to clause 21.14-5
- The St Leonards Structure Plan is overdue for a review, both in terms of time elapsed since its preparation and on the basis on the dramatic change over the last 4 years.
- The Settlement Strategy anticipates review of township boundaries on the Bellarine Peninsula. On the bases outlined above, no review of the St Leonards settlement boundary as part of the DAL process. The settlement boundary from 2014 has simply been adopted to 2064 without review.

It is clear that there is policy support for a review of the St Leonards settlement boundaries, and the DAL should reflect that support, and facilitate a detailed review.





The Macedon Ranges approach provides a template for this circumstance.

### **Requested change**

*That the nomination of St Leonards as having a 'protected settlement boundary be removed from relevant text and mapping*

*That the following test be incorporated into the discussion of settlement boundaries in the draft SPP.*

*Long-term settlement boundaries will be determined for St Leonards as part of the review of the St Leonards Structure Plan which forms part of clause 21.14. In the interim, the current plans will provide sufficient direction to guide strategic planning until these reviews are completed and settlement boundaries are determined.*

### **Conclusion**

The new role that towns such as St Leonards are expected to play within Council's settlement strategy are well understood.

The role of the DAL process is also well understood, in particular;

- The 50-year time frame
- The likely very long-term existence of protected settlement boundaries, once in place.

It is also acknowledged and recognised the DAL process and decisions in relation to St Leonards are taking place in a context of dramatic change and movement;

- Demographic shifts as a result of COVID 19 are significant and profound. These trends of work from home and coastal lifestyle have driven and will continue to drive significant demand for coastal property within 90 minutes from Melbourne (for towns such as St.Leonards) ;
- Due to dramatic take up of supply in St Leonards which has used 20-30 years supply in 4 or 5 years, and the consequences of this growth in terms of demographic changes, services, and infrastructure.

It is also clear that there has been no case made, on the basis of landscape values and investigation, that the St Leonards settlement boundary and any expansion of it, would compromise those values (see Hansen Assessment)

It is submitted, that based on these circumstances, the DAL and draft SPP are not appropriately informed to a point where setting a boundary for 50 years is justified, appropriate, or responsible planning without further strategic investigation. It is therefore submitted that the proposed Protected Settlement Boundary for St.Leonards be set as part of a future review of the St.Leonards Structure Plan and not part of the current DAL process (this would be similar to what occurred for Romsey and Gisborne as part of the Macedon Ranges DAL).

Lastly, it is requested that if the submitted changes are unable to be made then an Independent Planning Panel or Advisory Committee be appointed to hear evidence and submissions. This is precisely what occurred with both Macedon Ranges and Surf Coast DAL and to do otherwise would be a denial of natural justice for submitters.





**Managing Director**

**Appendix 1 Hansen Partnership Review of Landscape**



# Memo

To:	██████████	Date:	13 <sup>th</sup> August 2021
Company:	████████████████████	From:	██████████
Subject:	████████████████████ Review of Bellarine Peninsula Draft Statement of Planning Policy		

Hi ██████████

Further to recent discussions, we have undertaken a review of the *Bellarine Peninsula Draft Statement of Statement Planning Policy* (the *SoPP*) and associated *Technical Studies*, as these relate to landscape character and significance, in order to ascertain their implications with respect to your property at ██████████ ██████████ in St Leonards (the subject land). It is our understanding that the subject land is within the Farming Zone, and has an immediate abuttal to the St Leonards Golf Course to the north and sits directly opposite land on the eastern side of Ibbotson Street which is in the General Residential Zone and is presently under development.

Our assessment of the implications of the *Bellarine Peninsula Draft SoPP* and associated *Technical Studies* with respect to your property follows.

## **Bellarine Peninsula Draft Statement of Planning Policy (June 2021)**

All land within the Bellarine Peninsula was declared a distinctive area and landscape under section 46AO of the *Planning and Environment Act (1987)* on 29<sup>th</sup> October 2019.

The vision statement within the *Bellarine Peninsula Draft SoPP* describes landscape as follows:

*The area's distinctive landscape features — its southern coastal bluffs, cliffs and beaches from Breamlea to Queenscliff, the gently undulating Bellarine Hills and the tranquil coastal edge of Port Phillip Bay — are cherished. Panoramic views across the peninsula and out over The Heads past Point Lansdale and Point Nepean, vistas across Port Phillip Bay to the You Yangs and beyond, and views of Lake Connewarre and Swan Bay, are protected and accessible to residents and visitors. (p.21)*

The entire declared area is described as having either state significance, where visual values are exceptional, or regional significance, where visual values are high and regionally important. Map 4 within the *Bellarine Peninsula Draft SoPP* identifies the declared area's significant landscapes. The subject land is located within the 'Bellarine Northern Coast and Central Hills' landscape area, which is described as follows:

*Covering the whole central and northern area of the Bellarine Peninsula, the Central Bellarine Hills landscape area is characterised by gently undulating to hilly terrain, with high points including Mount Bellarine (also known as Murradoc Hill and the most dominant topographic rise in the north), Scotchman's Hill and Marcus Hill. The landscape area forms a backdrop to many settlements and offers expansive views to the coast and beyond. The hilly landscape interfaces with the coast with prominent slopes to Lake Connewarre and a steep escarpment overlooking the Bass Strait coast at Ocean Grove. There is a discernible, steeper edge to the landscape area in the north near Portarlington and Clifton Springs as it meets the coast. Before colonisation, the area would have supported a complex woodland community: now, only pockets of remnant native vegetation remain in small clusters, adjacent to waterways and along roadside reserves. The balance of the land is a cleared, agricultural patchwork of paddocks and planted windbreaks, with some exotic trees around homesteads and vineyard plantings. (p.32)*

The key objective for landscape is as follows:

*To protect and enhance the identified landscape character, physical features, view corridors and natural and cultural values of the declared area's significant landscapes. (p.33)*

Strategies to achieve the objective which Responsible Public Entities must consider, where relevant, include:

- *Provide protection that accords with the level of landscape significance, with the greatest level of protection provided for the state-significant Bellarine Peninsula Southern Coast landscape.*
- *Protect the coastal and hinterland settings of settlements by containing urban growth and development within settlement boundaries.*
- *Reserve green breaks between settlements for conservation, agriculture, nature-based tourism and natural resource purposes that prioritise the protection and enhancement of the significant landscapes and landscape characters.*
- *Ensure any development allowed in green breaks between settlements responds to the surrounding landscape character and maintains the visual dominance of the natural landscape by:*
  - *being sited so buildings are responsive to the landscape and use established vegetation or new vegetation buffers to screen development when viewed from the public realm.*
  - *providing setbacks from road corridors and publicly accessible land.*
  - *using building forms, design detailing and materials and colours that immerse buildings within the landscape, so they are not visually dominant.*
- *Ensure development does not protrude above hilltops and ridgelines, so natural contours and vegetation remain visible.*
- *Manage development and infrastructure to retain the dominance of views to the rural hinterland and/or coast from main movement corridors and public areas with access to significant views within the landscape.*

- *Conserve and increase native coastal and indigenous vegetation, particularly along waterway corridors and within vegetation reserves, by revegetating land in keeping with the ecological vegetation classes to strengthen landscape character. (p.33)*

### **Landscape Assessment Review – Volume 1 – Landscape Assessment Report**

The *Landscape Assessment Review* is one of a number of technical studies which have informed the preparation of the *Bellarine Peninsula Draft SoPP*. The following description is provided in the Introduction:

*The landscape assessment review updates the landscape characterisation work undertaken as part of the Coastal Spaces Landscape Assessment Study (2006); identifies the most significant landscapes and views; evaluates the key townships and their relationship to the broader natural landscape; and, recommends how the findings of the review are best translated into the future Bellarine Peninsula Statement of Planning Policy.*

The *Landscape Assessment Review* includes the following definition for 'landscape significance':

*Landscape significance is the designation of a particular landscape as special or important arising from its visual values, including its landscape features, edges or contrasts, and composition, with consideration of its other landscape values (ie cultural heritage, environmental, scientific, social, etc); and for its predominantly natural or undeveloped character, in which development is absent or clearly subordinate to its natural landscape qualities. (p.67)*

With respect to the Bellarine Northern Coast and Central Hills area, within which the subject land is located, the *Landscape Assessment Review* provides the following description:

*The Bellarine Northern Coast and Central Hills is a picturesque rural landscape, comprising gently undulating to hilly terrain, and a northern foreshore edge which overlooks Port Phillip Bay. It includes a number of topographical high points such as Mount Bellarine (also known as Murradoc Hill), which rises to an elevation of around 145 metres, and is the highest peak on the peninsula. Collectively, the Central Bellarine Hills form a prominent landscape backdrop to the townships on the north and north-east coast, as well as offering opportunities for elevated and expansive outviews towards the ocean. (p.109).*

The *Landscape Assessment Review* describes the Bellarine Northern Coast and Central Hills as being of regional significance, on the basis that it's landscape features, edges and composition have been assessed as being of moderate to high significance. Two significant viewing locations are identified for the [area](#): The Dell at Clifton Springs and the Harbour Lookout at Portarlington.

The *Landscape Assessment Review* makes the following observations with respect to the relationship to landscape and visibility of the township of St Leonards:

*Occurring on the flat topography of the eastern plain, St Leonards is not highly visible from its hinterland approaches, due to the lack of elevation and significant roadside reserves which block outviews. Built form is most visible from the water and coastal edge, where dwellings occasionally spill onto the beach as well as the sensitive wetlands environment of Edwards Point. From the southern foreshore area of Indented Head, the built form of the township can be seen extending to St Leonards Pier. However, significant stands of coastal vegetation and canopy trees intermingled with buildings mitigates the visual impact.*

*Largely contained by natural features to the north (Salt Lagoon) and south (Edwards Point / Swan Bay), development is progressing westwards into the (now residentially zoned) rural landscape. Again, due to the existence of intact reserves of roadside vegetation, developing subdivisions are not highly visible from a distance. A lack of connection to the surrounding landscape via indigenous vegetation and an absence of permeable space however, makes these areas visually conspicuous at closer proximity and from within the township. (p.143)*

## **Landscape Assessment Review – Volume 2 – Statutory Implementation Package**

Volume 2 of the *Landscape Assessment Review* translates the findings of Volume 1 into planning provisions for the identified significant landscapes that are directly implementable through the Greater Geelong Planning Scheme and the Queenscliffe Planning Scheme. None of the recommendations contained therein affect the subject land or its immediate abuttal.

### **Summary of our observations**

Having had regard to the *Bellarine Peninsula Draft SoPP* and associated *Technical Studies*, our observations in general and with respect to the subject land are as follows:

#### ***Significance of the subject land and surrounds***

The classification of all land within the Bellarine Peninsula Declared Area as being of at least regional landscape significance is a departure from the landscape significance classifications within the *Coastal Spaces Landscape Assessment Study (2006)*, which is a reference document within the Greater Geelong Planning Scheme. That Study identified and described the landscape areas of Lake Connewarre, Clifton Springs to Portarlington Coast, Murradoc Hill, Swan bay and surrounds, Lake Victoria and Yarram Creek, coast between Ocean Grove and Point Lonsdale, Barwon River Estuary and Thirteenth Beach Coast as being of regional significance and The Heads at Point Lonsdale as being of State significance. All other land on the Bellarine Peninsula, including the land to the west of St Leonards, was identified and described as being of local significance only.

The *Landscape Assessment Review* provides little – if any – clear explanation and justification for the re-classification of the land to the west of St Leonards from local to regional significance. There are no references to St Leonards in the description of the 'Bellarine Northern Coast and Central Hills' landscape area. Indeed even the title of the area seems to imply that it does not relate to St Leonards, which is located neither on the northern coast nor the central hills of the Bellarine Peninsula.

Also, importantly, the following clarification is provided at p. 74 of the Landscape Assessment Report (Vol. 1):

*The significance areas are necessarily nebulous at this stage of the process. Additional detailed fieldwork (outside the scope of this study) is required to define finite and fully justifiable boundaries of the type required to implement the Significant Landscape Overlay.*

We interpret this as the author acknowledging that further work is required to strengthen the assessment prior to 'enshrining' it within the Greater Geelong Planning Scheme. The author clearly acknowledges that detailed fieldwork is required and has not been done.

#### ***Visual sensitivity of the subject land and surrounds***



We note the acknowledgement within the *Landscape Assessment Review* that the land to the west of St Leonards is not considered to be highly visible, as a result of both the relatively low-lying topography and the screening provided by existing vegetation within and alongside roadways.

The visual sensitivity of a landscape is determined on the basis of its significance and its visual exposure. Land which is considered to be of higher significance or has a relatively high level of visual exposure will have a higher level of visual sensitivity than land of lower significance or land with a relatively low level of visual exposure. Land which is more visually sensitive has a greater propensity for visual impact resulting from a change – such as residential development - within that landscape. Land which is of a higher visual sensitivity and hence more susceptible to visual impact is more likely to require protection through statutory measures than land which is of a lower visual sensitivity.

Noting the inconclusive findings of the *Landscape Assessment Review* with respect to the significance of the land to the west of St Leonards, and the acknowledgement that the land has relatively low visual exposure, it is our opinion that the land has relatively low visual sensitivity, and as such is not considered susceptible to landscape and visual impacts to any extent which would warrant the application of statutory protection measures. Rather, it is our view that a change in use to this land – from rural to residential – could be accommodated without a detrimental impact on the intrinsic qualities (or significance) of its surrounds. This is especially applicable to the subject land given it's immediate abuttal to existing residential land.

The lack of any recommendations within Volume 2 of the *Landscape Assessment Review* for statutory controls aimed at protecting significant landscapes applicable to the subject site and surrounds appears to reinforce our view that this land is not sufficiently-significant, nor is it sufficiently-sensitive, to warrant that protection.

## Conclusion

Having reviewed the *Bellarine Peninsula Draft Statement of Planning Policy* (the *SoPP*) and associated *Technical Studies*, as these relate to landscape character and significance, it is our view that there is no clear justification for the classification of the land to the west of St Leonards – including the subject land at [REDACTED] – as a regionally-significant landscape, nor is there any clear justification for excluding this land from consideration for future residential use via the application of a Protected Settlement Boundary. The *Landscape Assessment Review* acknowledges that further work is necessary to “define finite and fully justifiable boundaries” and in doing so implies that any such application at this time is premature.

The land to the west of St Leonards does not exhibit the ‘distinctive landscape features’ referred to within the *Bellarine Peninsula Draft SoPP* and is acknowledged as having a low level of visual exposure relative to its surrounds. There is no clear justification in our opinion for elevating the statutory significance of this land from its present classification of ‘local significance’ consistent with *Coastal Spaces Landscape Assessment Study* (which is the relevant reference document within the Greater Geelong Planning Scheme).

Please contact the undersigned if you have any questions in relation to the information provided.

Yours faithfully,  
Hansen Partnership Pty Ltd

[REDACTED]

Director

