



Attention of: Planning Implementation – Bellarine DAL, DELWP  
Re: Distinctive Areas and Landscapes Program, Phase 3 Draft Statement  
of Planning Policy (SPP)

## Friends of Ocean Grove Nature Reserve Response to the draft SPP

14 August 2021

Friends of Ocean Grove Nature Reserve, [REDACTED]

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## About the Friends of Ocean Grove Nature Reserve (FOGNR)

The Ocean Grove Nature Reserve (OGNR) is the largest remaining intact grassy woodland habitat on the Bellarine Peninsula. The Reserve was created in the 1960s via public subscription and grant moneys that allowed the purchase of 143ha of private land containing largely unaltered indigenous vegetation. Originally, most of the Bellarine was covered in this type of grassy woodland habitat but it has nearly all been cleared for farming or urban development.

The OGNR was initially controlled by a local Committee of Management until it came under Parks Victoria management during the 1990s. At that stage, the Friends of Ocean Grove Nature Reserve Inc (FOGNR) was created to advise and assist Parks Victoria in maintaining the Reserve.

Many environmentally valuable attributes have already been lost during the past 60 years and this has caused the local extinction of nearly all small terrestrial native mammals and many bird species. The FOGNR have been involved over many decades in defending the ecology of the Reserve from the threat of the OGNR becoming an isolated remnant surrounded by urban zones. This has been a demanding and difficult task for a volunteer organisation.

**The FOGNR are pleased to be able to respond to the DAL draft SPP and present information and suggestions that can help guide the wording of the final SPP.**

## Comments on the DAL process and draft SPP

As an environmentally focussed group, most of our comments will address matters within the discussion paper that have a relation to the policy domains of Environmental Risks and Resilience plus Environment and Biodiversity. We are aware that a healthy environment within the OGNR is dependent upon connections between core habitat zones across the whole Bellarine, so our comments and analysis will apply more widely than just the zones adjacent to the OGNR.

The FOGNR commends DELWP, the City of Greater Geelong Council, the Queenscliffe Borough Council and the Victorian State Government for initiating the process to review the distinctive attributes and values of the Bellarine Peninsula and to then create a long-term planning framework that will protect these attributes into the future. Many community groups and individuals have also added their voice to the process. In particular, we note the thorough review of landscape values undertaken by Claire Scott.

The draft SPP is an excellent framework to guide planners, Planning Schemes and Responsible Public Entities (RPEs). The draft SPP has laid the foundations and structures to successfully reverse the decline in environmental values on the Bellarine and create a network of flourishing ecological communities.

**The essential decision within the DAL process is to formally enact permanent town boundaries. We also applaud the objectives of the SPP to protect current important habitats, create new habitat and connect habitats via biolinks.**

## Background information to comments and suggested amendments relating to policy domains Objective and Strategies

Grassy Woodlands of the Otway Plains are listed as an endangered Environmental Vegetation Community (EVC No 55) in the Environment Victoria Criteria for Bioregional Conservation Status of Ecological Vegetation Classes (EVC).

It is fitting that the OGNR is specifically mentioned in the draft SPP as a notable example of a Grassy Woodland community. Grassy Woodlands are one of the most threatened vegetation communities in Victoria and are listed. The OGNR is not only the largest remnant woodland on the Bellarine, but it also contains a wide range of grasses, wildflowers and shrubs that are extinct or declining in other areas of the Bellarine. It is a highly biodiverse environment.

Previously, various property developers have attempted to have rural areas in the north and west of the OGNR rezoned to allow residential development. The potential impact from such development would have been disastrous to the biodiversity of the OGNR. As established by expert submissions by Dr Guy Dutton and Mr Barry Lingham to the C395 Settlement Strategy panel hearing, many birds and wildlife move across the rural landscape to access the OGNR.

Many species of birds that breed in Tasmania use the reserve as a refuge over winter. Other bird species migrate north over winter and return to the OGNR to breed in spring. Residential developments to the north and west would effectively cut off the rural corridors used by these birds to access the OGNR. The OGNR would become a totally isolated habitat, effectively becoming a zoo that would require artificial maintenance of the various species.

These corridors also allow the flow of genetic diversity between the OGNR and other remnant vegetation areas, helping to maintain healthy and resilient populations.

Whilst these rural corridors do function as biolinks, their effectiveness would be greatly enhanced through well-planned targeted revegetation works to provide better shelter to allow the more vulnerable species to move between remnant patches of vegetation.

We note that the protection of the town boundaries as listed in the Settlement section of the SPP is necessary to the process of limiting impact upon the significant environments and biodiversity of the Bellarine.

# PART A - Review of the preliminary introductory section

## Page 6: About Victoria's peri-urban areas

The concept of various unique attributes of a DAL is fully explained in the final paragraph. This information should occur prior to the paragraph about the challenge facing government.

We suggest swapping the order of the two paragraphs for clarity so that the message about the challenge facing government re conserving and enhancing a DAL inherently includes the unique characteristics of the DAL.

## Page 7: About the Bellarine Peninsula declared area

### Table 1, Outstanding environmental significance

Item 1 Part a) includes three plants considered to be significant (Bitter-bush, Coast Wirilda and Trailing Coast Poa). These three are important listed species.

We contend that the **Bellarine Yellow Gum *Eucalyptus leucoxylon ssp. bellarinensis*** is a more important species as it is only found on the Bellarine and part of the Surfcoast. The Bellarine Yellow Gum is listed as endangered in the Flora and Fauna Guarantee Act (F&FG) and should be included in the table.

Non-avian fauna are not mentioned. The following fauna species should be included in the table:

- **Brown Toadlet *Pseudophryne bibronii***. Listed in the F&FG as endangered. The southernmost recorded presence is from the Ocean Grove Nature Reserve.
- **Metallic Cool-skink *Carinascincus metallicus***. Present in mainland Australia only on the Bellarine and Mornington Peninsulas.
- **Glossy Grass Skink *Pseudemoia rawlinsoni***. Listed as vulnerable, found near wetlands across the Bellarine.

Item 1 Part b) discusses wetlands. The final sentence notes "several unique and threatened species". The actual number of threatened wetland birds and migratory shorebirds is more than a dozen. Change to "many unique and threatened species".

## Page 9: Map 1. Location of Bellarine Peninsula declared areas

The shoreline of Swan Bay / Edwards Point is not visible on this map, creating confusion as a large area is shown as Parks and Reserves (the Marine Park at Swan Bay) but it appears to be a terrestrial reserve.

Suggestion: Clearly mark all the actual Bellarine shorelines accurately on the map (perhaps in a distinctive colour).

## Page 10: Map 2. Bellarine Peninsula declared areas

Again, the shoreline of Swan Bay /Edwards Point/Swan Island/ Duck Island should be clearly shown. Indicating the small channel for boat access from Swan Bay jetty is confusing. Although it is not technically part of the Marine Park, it is probably best shown as part of it.

The terrestrial parks (in green) are shown on the Mornington Peninsula, but not on the Bellarine DAL. This error should be fixed. Some Coastal Reserves are shown, but only those under council or coastal management. Parks Victoria managed reserves are not shown (e.g. Edwards Point).

### **Page 13: Selected United Nations sustainable development goals**

The FOGNR endorse the adoption by DELWP of the 10 United Nations sustainable development goals to guide drafting of the SPP.

### **Page 14: State and regional policy context**

We endorse the quoted policies as the key applicable documents.

### **Page 15-16: Implementation of the Statement of Planning Policy**

Some issues not addressed in this section:

- There is no indication of any rough timeline for the implementation of changes to the Planning Scheme by councils or to practices by responsible public entities (RPEs).
- What dispute resolution process is available if the public or DELWP believe that Planning Schemes or the actions of RPEs do not properly meet the objectives within the SPP?

### **Page 17: Monitoring and review**

It is noted that “to provide long-term certainty for the declared area .... The SPP will be reviewed at least every 10 years”.

- It is not clear what would be reviewed – the entire vision, particular objectives or the effectiveness of the strategies?
- Given the 50 year scope for the vision, the vision should not be changed after 10 years as that would destroy long-term certainty. We assume that the main focus of any review would be to assess the effectiveness of the strategies at meeting the objectives. Some objectives could change, but that would require a significant review with input and consultation from the community. More detail should be included in this section.

### **Page 19: Wadawurrung statement of significance**

Appropriate.

### **Page 20-21: Our vision**

The vision statement is comprehensive and very well worded.

We believe that local community groups should be included along with “Wadawurrung, governments, public land managers, businesses, residents and visitors will all work together....”

### **Page 22-23: Declared area framework plan**

Appropriate, although map 3 contains mainly general concepts rather than accurate detailed information.

# PART B - Review of the policy domains section

## 1. Environmental risks and resilience

Generally, we agree with most of the objectives and strategies within this domain.

We applaud the efforts from local government, CCMA and Barwon Water to mitigate and adapt to progressive global warming impacts.

In the section on Rising Sea Levels p25, we note that the Lonsdale Lakes system (Lake Victoria, Freshwater Lake and several smaller unnamed lakes) all face inundation by a rising sea level and an influx of extra storm water. The Lonsdale Lakes should be included in the listed zones at risk.

### Bushfires

On p26, the need for planned restrictions to human habitation is noted. However the damage to natural environments caused by over-zealous clearing to protect homes and infrastructure is extensive. Nearly all houses adjacent to the OGNR have removed all native understorey vegetation, fallen logs and dead tree stags. This has the effect of creating a major barrier to wildlife movements and underscores the need to retain areas of grassland, low density understorey and wooded zones that can connect the OGNR to the wider environment.

We would encourage private land holders to adopt environmentally sensitive means of fire hazard control including planting native grass species that do not have as much biomass as introduced grasses and present a lower fire risk. Native grasses remain greener for longer and do not dry off in early summer. Regular low intensity burning reduces the build up of flammable biomass, mowing timed to prevent weed species from setting seed, the planting of low flammability shelter belts and other adaptive methods can help create healthy environments with lower fire risk.

We strongly advise that no homes or significant infrastructure be constructed within fire hazard zones. In areas identified as biolinks zones, special consideration must be made to balance fire risk with creating biodiverse habitats. Care must also be given to educating the public about fire risk. It is important that the risk is identified and strategies adopted to minimise the risk while still protecting important natural habitat.

### Water security

Barwon Water is undertaking detailed planning to provide adequate water supplies in the future. In the meantime, developments around the Bellarine are funnelling larger amounts of stormwater into local water ways, creating many problems. In future, stormwater harvesting, storage and reuse is vital. Some of the retained stormwater can then be used for environmental flows into local wetlands while some can be allocated to human uses.

### Human impacts

This section is very significant yet is only briefly addressed and has little specific guidance. The need to manage access to beaches and natural assets is noted, with littering and trampling of vegetation being listed as impacts.

The massive increase in the population of dogs should be mentioned here – the regulation of where, when and how pets can access public spaces needs addressing. Dogs should not be given access to key biodiversity areas. Provision of alternative public spaces to exercise dogs must be considered.

To prevent the killing of native wildlife, domestic cats should be confined to their home boundary during the day and kept inside at night.

Similarly, the number of people riding mountain bikes, trail bikes and horses and other outdoor activities is quickly increasing. They are making increasing demands for access to environmentally sensitive spaces such as the OGNR. Alternative spaces should be provided for these activities so they do not cause detriment to remaining important habitats and wildlife.

Environmental risk and resilience on the Bellarine must include the threatening process of fragmentation of habitats. The historic and continued development of urban zones, farming and other land uses has created a series of isolated remnant woodland habitats across the Bellarine. This has been the main driver of the localised extinction of small mammals and woodland bird species and the significant reduction in populations of many other indigenous wildlife species.

Encouraging residents to plant indigenous species of grasses, wildflowers and smaller bushes in existing urban areas will help retain a wide number of invertebrate species, reptiles, frogs and small birds. Indigenous gardens act as stepping stones to connect remnant vegetation.

We note that the protection of the town boundaries, as listed in later Settlements section of the SPP, greatly assists the process of limiting human impact upon the environment and helps meet Objective 1.

## Objective and strategies

**Objective 1:** The objective clearly articulates objectives related to climate change risk and also notes the need to support mitigation and adaptation measures. It does not include other detrimental human impacts. We suggest the following amendments and additions:

Reword Objective 1 to read:

*To achieve a zero-carbon future and support the resilience of the declared area's distinctive attributes by taking sustained measures to mitigate greenhouse gas emissions and adapt to the impacts of climate change, human impacts and natural hazards.*

**Strategies:** The strategies listed adequately deal with achieving most of Objective 1. We suggest the following amendments and additions:

Reword Strategy 1.4 to ensure better clarity:

*Ensure any infrastructure is designed to minimise impacts on existing environmental features including vegetation, habitat, natural landforms and natural flows of water.*

Additional strategy to read:

*1.12 Ensure regulation of human activities to minimise the impact upon beaches and natural assets such as coastal dunes, remnant vegetation, waterways and wetlands.*

## 2. Landscape

We commend Claire Scott on her comprehensive analysis of the landscape values of the Bellarine Peninsula. Her recognition, analysis and mapping of significant landscapes of the Bellarine, both of state significance and regional significance, gives a solid basis for the protection and enhancement of these features.

The highly detailed and thorough review of landscapes across the Bellarine and the accompanying clearly worded objective 2 and associated strategies demonstrate the advantage of using experts to assist in the SPP process.

We note that the protection of the town boundaries as listed in the Settlement section of the SPP is necessary to the process of limiting impact upon the significant landscapes of the Bellarine.

## Objective and strategies

**Objective 2:** We strongly agree with the objective.

**Strategies:** We strongly agree with the strategies.

### 3. Environment and biodiversity

The preamble information on p36 and 37 is comprehensive, listing important sites of biodiversity, threats to the environment and general information about threatened species listed under the state Flora and Fauna Guarantee or the federal EPBC Act. The Ramsar treaty obligations to protect significant wetlands are explained.

The other major international treaty that places obligations upon Australian authorities to protect migratory bird species is ROKAMBA: Republic of Korea-Australia Migratory Bird Agreement.

ROKAMBA is not listed.

It should be noted in the SPP that these Acts and international treaties place obligations on authorities to ensure the protection of threatened species.

We are pleased that all the key threatening processes are listed and explained. Methods to protect and enhance the resilience of the flora and fauna populations are detailed. The concept of net gain in the extent of habitat is ambitious, but necessary.

#### **Need for monitoring of the environment**

A detailed ongoing monitoring program of the habitat condition and species present at the key biodiversity sites is needed to be able to determine current biodiversity health of the environment and to measure changes that occur over time.

#### **Coordination of responsible public entities**

One problem facing coordinated environmental management across the DAL zone is the multiple agencies responsible for land management and implementing the DAL strategies. City of Greater Geelong, Borough of Queenscliff, Parks Victoria, Barwon Coast, Bellarine Bayside, Barwon Water and Parks Victoria all independently manage coastal zones and inland reserves. DELWP, the CCMA, Barwon Water and Councils all have regulations or strategies to meet various interconnected environmental goals.

Creating well-vegetated biolinks and enhancing existing sites of high biodiversity will require planning, input and action by many organisations and private land owners. For effective delivery of the environmental and biodiversity strategies recommended in the SPP, a single review committee should be created to meet biennially and conduct a review of the progress towards achieving the stated goal of conserving and enhancing biodiversity. The body should have representatives from each of the main land managers plus the Bellarine Catchment network, Bellarine Landcare, two sitting councillors and two members of the public.

Note that this review body would not function as a review of the SPP strategies but would act to ensure that the recommended strategies are being implemented through coordinated actions.

#### **Mapping species and vegetation**

Map 6 on page 39 is a useful guide to the key biodiversity areas on the Bellarine and indicates zones of connection between those features. This map is not designed to show precise locations of these zones, but we believe that a detailed mapping of key sites, including significant roadside vegetation and vegetation on private properties should be completed. This information should be used to guide restoration works and the creation of biolinks.

The City of Greater Geelong, the Borough of Queenscliff, DELWP and the CCMA should endeavour to share their information and database records to allow accurate, up-to-date and detailed mapping of vegetation, biodiversity and locations of threatened species observations. Data using citizen science based observations from iNaturalist, eBird, Birddata and the Atlas of Living Australia should also be accessed as these records are usually the most recent.



## Objective and strategies

**Objective 3:** We strongly agree with the objective.

**Strategies:** We strongly agree with the strategies but we believe additional strategies should be included. We suggest the following amendments and additions:

Reword Strategy 3.5 to read:

*Prevent use and development that would ..... (Discourage is not strong enough)*

Additional Strategy 3.9 to read:

*Undertake ongoing monitoring of the species biodiversity of the key biodiversity features to allow regular assessment of changes to habitat health and threats to particular species.*

Additional Strategy 3.10 to read:

*Create a Committee of Review with representatives from land managers and administrative agencies, private land owners, council and the public. The committee would review the progress towards conservation and enhancement of habitat and wildlife biodiversity and ensure coordinated action is undertaken to implement the SPP strategies.*

Additional Strategy 3.11 to read:

*Land Managers and responsible authorities share wildlife and flora database information to allow accurate mapping of all significant sites of biodiversity and locations of threatened species.*

## 4. Aboriginal cultural heritage

We acknowledge the ancient connections between the Bellarine, the Wadawurrung traditional custodians and the Kulin nation. The Wadawurrung cultural connections include the many artefacts and significant sites but also the living landscape and the species within it, the waterways and the landforms. Keeping cultural connections involves ceremony, connecting to land by cultural burning and accessing traditional sites and the passing of knowledge on to new generations.

### Objective and strategies

**Objective 4:** We strongly agree with the objective.

**Strategies:** We strongly agree with the strategies.

In particular, we support the adoption of traditional naming of areas and places within the Bellarine.

We note that the protection of the town boundaries as listed in the Settlement section of the SPP is necessary to the process of limiting impact upon the significant Wadawurrung cultural heritage of the Bellarine.

## 5. Historic heritage

### Objective and strategies

**Objective 5:** We strongly agree with the objective.

**Strategies:** We strongly agree with the strategies.

## 6. Tourism, agriculture and natural resources

We acknowledge the value of tourism and agriculture to the economy of the Bellarine. The Bellarine acts as a refuge from the stresses of life in the larger cities and we welcome visitors to enjoy the natural beauty of our landscapes and key environmental zones. It is vital that new developments do not detract from these unique values.

We note that the protection of the town boundaries as listed in the Settlement section of the SPP is necessary to the process to protect landscapes, environments, green breaks and farmland that attract tourists to the Bellarine.

## Objectives and strategies

**Objective 6a:** We strongly agree with the objective.

**Strategies:** Strategies 6a.1, 6a.2, 6a.3 discuss encouraging visitation infrastructure that has low impact, is appropriately located and does not compromise environmental values and rural land use or significant landscape views. It would be better to define areas where these types of infrastructure and developments could be allowed via the land zoning schemes and protective overlays.

We are particularly concerned that the demand for tourism infrastructure and facilities will increase pressure on the rezoning of farmland or green break zones. Any such rezoning could have significant impacts upon the green breaks, landscapes and environmental connectivity of the Bellarine.

Accommodating visitors within designated caravan / cabin parks will be addressed in the Settlements Policy Domain.

**Objective 6b:** We strongly agree with the objective.

**Strategies:** We strongly agree with the strategies.

## Map 7: Tourism, agriculture and natural resources

Map 7 indicates sections of the Bellarine that are shown as areas of Extractive Industry Interest. Geologically useful material is located in those areas, but many of those same areas have significant landscape values, high quality biodiversity or threatened habitat that must be protected. This is especially so in areas adjacent to coastal zones.

## 7. Strategic Infrastructure

The information on Transport, Water security and Community infrastructure is brief and does not examine detailed options for the future. There is little mention of how a viable, well used public transport network could be delivered to the Bellarine. What new initiatives are needed?

Provision of an adequate water supply to the whole Geelong region is a significant future problem that is being investigated by Barwon Water. The full analysis of water supply is beyond the charter of the SPP.

Community infrastructure analysis on p 50 should specifically include Aged Care facilities. There is increased demand for construction of these facilities across the Bellarine. They are now major employers and a significant sector of the local economy. Construction of large health or aged care facilities must occur within the urban boundaries. Planning for suitable locations should be part of this SPP.

## Objective and strategies

**Objective 7:** We strongly agree with the objective.

**Strategies:** We strongly agree with the strategies and suggest an amendment to Strategy 7.5 to include improved public transport.

Amendment to Strategy 7.5 to read:

*Strengthen transport connections between the settlements of the Bellarine Peninsula, Geelong, Melbourne and other regional communities and develop a well-patronised public transport system.*

## 8. Settlements

We acknowledge the significant efforts made by the City of Greater Geelong to develop the Settlement Strategy via Amendment C395 and the long term planning for controlled development of settlements that has been successfully undertaken. We congratulate the City of Greater Geelong on this achievement that has run parallel to the DAL process.

The findings from earlier Structure Plans, the CoGG Settlement Strategy and the Phase 1 & 2 DAL undertakings, have clearly shown the values of the Bellarine that must be protected. It has also shown that the only method to give adequate sustained protection to those values is the restriction of residential development to within the current town boundaries. We endorse the town-by-town analysis given on pp 52- 58.

A significant omission is any comment or analysis on the residential caravan/cabin parks containing significant permanent or semi-permanent populations that are outside of urban boundaries. There are two such parks (Pelican Shores and Sands) on the northern Bellarine Coast as well as one at Moolap (Moolap Caravan Park) and another on the Swan Bay shore (Swan Bay Holiday Park).

Although originally set up for short-term visitor accommodation, they now have mainly semi-permanent residents. There has been a transition from site rental to actual purchase of title at some of the parks. While fulfilling a need as low-cost accommodation for some low-paid local workers, they have become small villages and have high demand for expansion.

Similarly, defacto urban expansion through housing developments on golf courses should be prevented. The same applies to the creation of "retirement villages". Caravan parks, retirement villages and other non-urban settlements should not expand beyond their current boundaries and new facilities should be located within the urban zones.

### **Objective and strategies**

**Objective 8:** We strongly agree with the objective.

**Strategies:** We strongly agree with the recommendations within the strategies, including the recommendation to create protected boundaries for Bellarine townships as stated in the District Towns information and displayed in the accompanying maps.

## Conclusion

The Friends of the Ocean Grove Nature Reserve view the release of the draft SPP as a major change to the old methods of planning and development. For more than 180 years the Bellarine area has experienced increased population, a continued expanding urban footprint, destruction of the original habitat and decline in native mammal species. Planning scheme amendments and Structure Plans were based upon individual Bellarine townships and tended to react to current conditions without any long-term integrated focus.

Business as usual cannot be allowed to continue as we risk losing many of the precious attributes that are so valued by Bellarine residents, the wider population of Victoria and also tourists from all over the world.

To “turn the ship around” will be a slow and complex process. The urban developments within Armstrong Creek were the result of better planning to cope with rapidly rising regional populations. The adoption of the City of Greater Geelong C395 Settlements Strategy was another significant step towards effective long-term planning of where future populations within the Geelong Region will be accommodated.

DELWP, CoGG, BoQ, CCMA and the other entities who have collaborated to guide the evolution of the DAL process have created a draft SPP that is a well-designed and it has captured the essence of what should be protected, what sort of future we aim to achieve and methods for how we can achieve that future.

We urge that our suggested amendments be considered as being suitable additions to complement the key ideas of the SPP.

**We note and applaud the attempts by DELWP to urge greater involvement of the people of the Bellarine in the review of the draft SPP. It is vital that the SPP is understood and “owned” by the citizens who will be most affected by the implementation of the SPP.**