

Submission by [REDACTED] - Bellarine Peninsula Distinctive Area and Landscape Phase 3

I commend the DELWP for declaring The Bellarine a Distinctive Area and Landscape and greatly appreciate the opportunity to participate in the community consultation process.

My submission is made in reference to the Draft Bellarine Distinctive Peninsula Statement of Planning Policy.

Suggested additions and/or modifications are shown in red and are intended to be helpful and assist in protecting the distinctive character of The Bellarine for future generations.

I recommend that in all instances “Protected settlement boundary” be changed to “Protected ‘settlement area’ boundary” and that the SPP clearly state that Clifton Springs is a settlement.

Page 20: -

Our vision

The vision for the Bellarine Peninsula is set out below. It is for at least 50 years, and it identifies the values, priorities and preferences of the Victorian community in relation to the unique values and distinctive attributes of the declared area, including preferences for future land use, protection and development.

Councils will operate a transparent planning policy that is demonstrably consistent with this vision and are committed to engaging our communities on the issues that matter in a transparent, open and accountable way.

By 2071, our vision for the Bellarine Peninsula declared area is that Wadawurrung, governments, public land managers, businesses, residents and visitors will all work together to ensure the area’s unique values and distinctive attributes — the things people love about the area — are protected and enhanced and are not degraded over time. Consequently, the Bellarine Peninsula is a sustainable, uncongested and diverse region with thriving rural and coastal communities. Its unique natural beauty, Wadawurrung living cultural and its historic heritage, ecological significance, distinctive landscapes, recreational activities and identity are widely recognised and celebrated and foster a year-round ecotourism and visitor economy.

Environmental resilience: The declared area has an appropriate and sustainable population size, reduced Greenhouse gas emissions, resource use and waste to near zero and is resilient to the impacts of climate change (such as a warmer and drier climate, increased bushfire risk, higher sea levels and coastal erosion). Local communities and visitors embrace walking, cycling and public transport. Investment in renewable energy and integrated water management infrastructure is prioritised

Aboriginal cultural heritage: Wadawurrung rights to self-determination are respected so that their aspirations for their lands, waters and culture are realised through the transfer of relevant decision-making powers. Wadawurrung knowledge and practices inform planning, land and watermanagement decisions and help to protect the environment and biodiversity. Wadawurrung

living cultural heritage is highly valued, and the area is respected as a place of significance to the Wadawurrung.

Environment and biodiversity: Indigenous trees, plants and animals are valued and flourish within a natural environment that is healthy, well cared for and cherished by local communities and visitors. Pest species are low in numbers due to the successful implementation of a policy for their removal. All the area's unique marine and waterway environments (e.g., the Ramsar wetlands of Swan Bay, Lake Connewarre, the Barwon Estuary and the bay coastal marine environment) are valued, unpolluted, and healthy. Fragile ecosystems and biodiversity are supported by a network of well-managed parks and reserves and private lands and gardens.

Landscape: 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 Lonsdale 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.

Historic heritage: The area's rich maritime, military and non-Indigenous settler heritage — its historic towns like Queenscliff and architecture like the Portarlington Grand Hotel — is preserved and respected for its contribution to the history, identity and character of the Bellarine Peninsula and its communities. Visitor economy, agriculture and natural resources: The declared area is a renowned agricultural producer and world-class sustainable ecotourism destination. Water resources are secure and support diverse, environmentally conscious, resilient, productive and prosperous industries.

Strategic infrastructure: Community connections and health and wellbeing are strong. The road infrastructure is safe and uncongested. Everyday needs are met with accessible community health, education and social infrastructure. An interconnected network of sustainable active transport routes and outdoor activities attract visitors and help to improve health, build relationships between people and connect them with their surroundings.

Settlements: The coastal and rural towns and villages of the Bellarine Peninsula offer a variety of housing and lifestyle choices where development is well-planned and sympathetic to each settlement's unique character. Settlements are cool with a leafy tree canopy and native birdlife. The historic nature of settlements is respected and preserved with Low Density Residential Zones providing "urban edge" breaks between individual settlements within protected settled area boundaries (e.g., between Clifton Springs and Drysdale). Settlements are well-connected to local jobs and services, protect and enhance environmental and cultural attributes, resilient to natural hazards and the effects of climate change. Well defined protected 'settlement area' boundaries protect and preserve the prized coastal and rural hinterland landscapes of the declared area.

Environmental risks and resilience

Human impacts (page 26)

The Bellarine peninsula is particularly vulnerable to traffic congestion due to population increase because it has a bottlenecked road infrastructure system which is largely routed through Geelong. Management of population must be carefully addressed so unacceptable congestion does not occur in Geelong or The Bellarine.

Over time, the demand for access to the declared area's beaches and natural assets will increase as the number of residents and visitors continues to grow. Management of this demand at peak periods must be carefully addressed.

Other human impacts that must be mitigated are littering, trampling of vegetation due to unmanaged access and illegal clearing of native vegetation. More-intense rainfall events are also likely to result in greater quantities of pollutants being washed from urban and agricultural areas into waterways, wetlands and the marine environment

Proposed additions (shown in red)

Objective 1

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

Suggested Additional Strategies under Objective 1

Determine what is an appropriate population for The Bellarine with respect to: -

The available local employment.

The critical volume-to-capacity ratio of its road infrastructure.

The climate changing emissions as a result of delays and inefficiencies within its road infrastructure.

The efficacy of its public transport system.

The distinctive character of its settlements.

The increased risk of greater quantities of pollutants being washed from urban areas into waterways, wetlands and the marine environment.

The biodiversity, ecological and environmental values of the declared area.

Implement appropriate planning actions to ensure that the permanent residential population of The Bellarine does not exceed this determined number. (It is anticipated that this would be less than 100,000.)

Page 28 Landscape

Objective 2 Page 31

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

Suggested Additional Strategies

All Planning Applications to Council be allocated an Environmental Classification.

This to be based on assessment to designated criteria: e.g.
Involving the storage of hazardous, flammable and toxic materials?
Within 200 metres of a water course, a dam or the coast (high water line)?
Within 1km of underground spring water activity or anywhere where there is demonstrable risk to groundwater?

The value of established trees on the property (a dollar value be assigned).

Risk to flora or fauna, etc.

Suggested Environmental Classifications: -

Low – None of the designated criteria

Sensitive – One of the designated criteria

Highly Sensitive – Two or more of the designated criteria

A one-page form be constructed and be required to be completed by council as part of the planning application process.

An Environmental Classification would then be allocated appropriately and form part of the process.

Page 38 Environment and biodiversity

Objective 3

To conserve and enhance the significant biodiversity, ecological and environmental values of the declared area.

Suggested Additional Strategies

Assign a dollar value to established trees when assessing planning applications.

Implement a policy to remove vermin pest species from the Bellarine.

Reinstate native animals and create wildlife reserves that are free of feral animals (especially cats and foxes)

All designate waterways and coastlines are to be classified as biolinks. Piping waterways underground for development purposes will not be allowed.

Biolinks are, as far as possible, not to be privately owned and are to be accessible by the community.

The storage of petroleum and hazardous materials within 200 m of biolinks will not be allowed and, now that major auto manufacturers are moving away from fossil fuels, no more petrol stations will be allowed.

Objective 4

The following objective is binding on Responsible Public Entities.

To conserve, strengthen and promote the declared area's Aboriginal cultural heritage values and partner with Wadawurrung Peoples to care for Country.

Objective 5

The following objective is binding on Responsible Public Entities.

To protect, strengthen and promote the declared area's post-colonial historic heritage values **and the character of settlements.**

Suggested Additional Strategies

Impose a minimum residential lot area of 600 m² and a planning requirement that no residential lot may have building and hard surfaces occupying more than 60% of the land surface.

Page 46 Tourism, agriculture and natural resources

Objective 6a

To enable a diverse, sustainable, **accessible** and responsible visitor economy that helps protect the significant environmental, landscape, agricultural and historic heritage values of the declared area.

Suggested Additional Strategies

6a.7 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.: -

A Bay Coastal Trail from Geelong to Portarlington to Queenscliff.

An Ocean Coastal Trail from Torquay to Ocean Grove to Queenscliff.

A Barwon River Trail from Geelong to Barwon Heads.

6a.8 Provide increased tourist accommodation.

Page 50 Strategic infrastructure

Objective 7

To ensure the integrated provision of transport, essential services and community infrastructure meets the needs of the community while increasing resilience to climate change. **To ensure a sustainable transport network that does not contribute excessively to climate change and is free of excessive congestion and delays.**

Suggested Additional Strategies under Objective 7

Implement strategies to ensure that traffic flows through the three “feeder roads” to The Bellarine do not exceed critical traffic volume-to-capacity ratios.

New road infrastructure should have to successfully pass through an “Evidence Based Approval Process” prior to being granted approval.

Conduct a road traffic safety study to investigate methods by which road safety can be improved.

Conduct a road traffic study to investigate the capacity of The Bellarine’s Road system and its critical volume-to-capacity ratio.

Implement planning parameters that ensure that the road infrastructure of the Bellarine does not become clogged with traffic and contribute excessively to climate change.

Construct a comprehensive network of interconnected cycling and walking trails.

Suggest Change Settlements to Settlement areas

The settlements of the Bellarine Peninsula are highly desirable places to live, work and visit, given the lifestyles they offer and their proximity to Geelong and Melbourne.

The Bellarine has 11 settlements: - Leopold, Curlewis, Wallington, Drydale, Clifton Springs, Portarlington, St Leonards, Queenscliff, Point Lonsdale, Ocean Grove and Barwon Heads.

(Mannerim and Murradoc are defined as rural-living nodes.)

Each has its own unique identity, character, role and function.

The rate and amount of population growth in the declared area over the last decade have been strong, compared to other settlements in the G21 region and regional Victoria. As a result, the declared area’s unique values and distinctive attributes have been under pressure from overdevelopment. To achieve the 50-year vision, ‘settlement area’ boundaries are being defined and population levels therein must be carefully planned and ecologically sustainable development reinforced.

Nine distinct ‘settlement areas’ are defined: - Barwon Heads, Drysdale–Clifton Springs - Curlewis, Indented Head, Leopold, Ocean Grove, Point Lonsdale, Portarlington, Queenscliff and St Leonards. The settlement area of Drysdale-Clifton Springs-Curlewis encloses three historically individual settlements due to their close proximity.

Barwon Heads, Ocean Grove etc.....

Settlement hierarchy

Table 2 shows the proposed hierarchy designations of the ‘settlement areas’ in the declared area (excluding rural-living nodes). The ‘settlement areas’ are designated as either **district townships** or villages.

District townships are the main ‘settlement areas’ and where most of the declared area’s population lives. They provide a diversity of housing choices, jobs and services for residents, workers and visitors. Most growth and investment should be directed to these ‘**district townships**’, particularly in identified housing diversity and growth areas, to make efficient use of services and infrastructure.

Villages are smaller settlements with limited services and infrastructure, typically only servicing residents and workers. They are valued for their quiet, relaxed atmospheres and compact urban forms. Growth will be limited in villages.

Table 2: Proposed hierarchy of Bellarine Peninsula declared area “settlement areas”

The 11 settlements are proposed to be defined as follows:

Settlement area	Proposed hierarchy designation
Drysdale–Clifton Springs– Curlewis Leopold and Ocean Grove	District township: a ‘settlement area’ 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.

Objective 8

To plan and manage the sustainable development of ‘settlement areas’ in the declared area consistent with each of the 11 settlement’s unique character, role and function and the protection and enhancement of the area’s landscape significance, environmental and biodiversity values, Wadawurrung living cultural heritage and historic heritage values.

Strategies

8.5 Ensure development at the periphery of ‘settlement areas’ provides an urban-to-rural transition and is designed to integrate with the landscape character and environmental and biodiversity values.

To only allow low density residential development on the historic non-urban break between Clifton Springs and Drysdale.

Determine what is an appropriate population for each settlement area with respect to: -

The available local employment.

The efficacy of its public transport system.

The distinctive character of the settlements within the settlement area.

The increased risk of greater quantities of pollutants being washed from urban areas into waterways, wetlands and the marine environment.

The biodiversity, ecological and environmental values of the settlement area.

Implement appropriate planning actions to ensure that the population does not exceed this appropriate level.

Suggest Change Settlements to ‘Settlement areas’

Drysdale–Clifton Springs–Curlewis

Map 9 shows the proposed protected ‘settlement area’ boundary for Drysdale–Clifton Springs–Curlewis.

It is a district township set within coastal, grassy plains extending from the rural hinterland down to the sandy Port Phillip Bay foreshore. It sits within the regionally significant Bellarine Northern Coast and Central Hills landscape, which is characterised by productive agricultural uses including award-winning wineries, and it has areas of significant environmental and cultural value.

As the name implies this proposed ‘settlement area’ boundary encompasses 3 separate settlements with separate distinctive characteristics: -

Drysdale is a district town, providing employment and retail and community services to the declared area.

Clifton Springs is an historic coastal settlement on Port Phillip Bay characterised by medium-sized residential subdivisions with wide nature strips. Recreational attractions are centred around its scenic foreshore and boat harbour.

Curlewis was historically a rural area comprising farmland, wineries and a golf course. It now is providing a range of housing mostly a new area of smaller-lot-size residential development.

Declared biodiversity connections run between Curlewis and Clifton Springs and through Drysdale. Historically, non-urban breaks existed between the three settlements. Some of these remain but are in danger of being eroded by smaller-lot-size developments that are not consistent with the character of any of the three settlements or the intent of the DAL legislation.

Future growth and “infill” within the protected ‘settlement area’ boundary needs to be carefully managed in order to preserve these biodiversity connections and the ecological value of what remains of the historic non-urban breaks and to maintain the individual distinctive character of the three settlements.

This to be achieved by an “urban edge” treatment. Smaller-lot-size developments will not be allowed within defined zones (see Map 9) of what remains of these historic settlement breaks within the protected ‘settlement area’ boundary (e.g., between Clifton Springs and Drysdale). These to be “parks and reserves”, “rural residential” or “low density residential zone” (LDRZ) areas. The Low Density Residential Zone (LDRZ) is a ‘residential’ zone. 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. A different lot size can be specified in a schedule to the zone. A dollar value is to be placed on the trees during this process thus providing for the retention of the significant arboreal, environmental and landscape attributes within these historic settlement breaks.

The historic Drysdale Town Centre is an activity centre that can accommodate infill development and continue to provide retail and community services to northern areas of the Bellarine Peninsula. The small, light-industrial precinct along Murradoc Road will continue to support employment and industry in the declared area. Drysdale also has a significant cultural, education and sports precinct: an important asset to the region providing school, recreational, cultural and arts facilities.

For Clifton Springs, development within established residential areas will take place more incrementally and respond to the low-scale setting, retain existing vegetation in the public and

private realm, include appropriate boundary setbacks and protect views of the bay. Low-density residential areas will provide a transitional urban-edge treatment and will continue to provide for the retention of significant environmental and landscape attributes and experience minimal change.

Several designated waterways and creeks pass through the area. These are to be preserved within open space and piping these waterways underground to enable commercial or residential development will no longer be allowed. To this end the land to the west of Springs Street through which Springs Creek flows will be rezoned as public reserve.

The identified growth area will provide a range of housing and the emerging activity centre in the western growth area of Curlewis will provide local retail functions and employment opportunities for residents, e.g. tourism and retail.

The northern area of the western growth area will be zoned appropriately in order to provide a range of accommodation, a wedding venue, recreation activities and iconic dining (similar to Jack Rabbit). This area (shown in blue) is currently operated by Baie Wineries as a winery and wedding venue and is ideally suited for tourism activities due to its northern aspect, iconic bay views, proximity to wineries, two golf courses, the Rail Trail, the foreshore and bay activities including the heritage springs and artificial reef snorkelling attractions at the Dell.

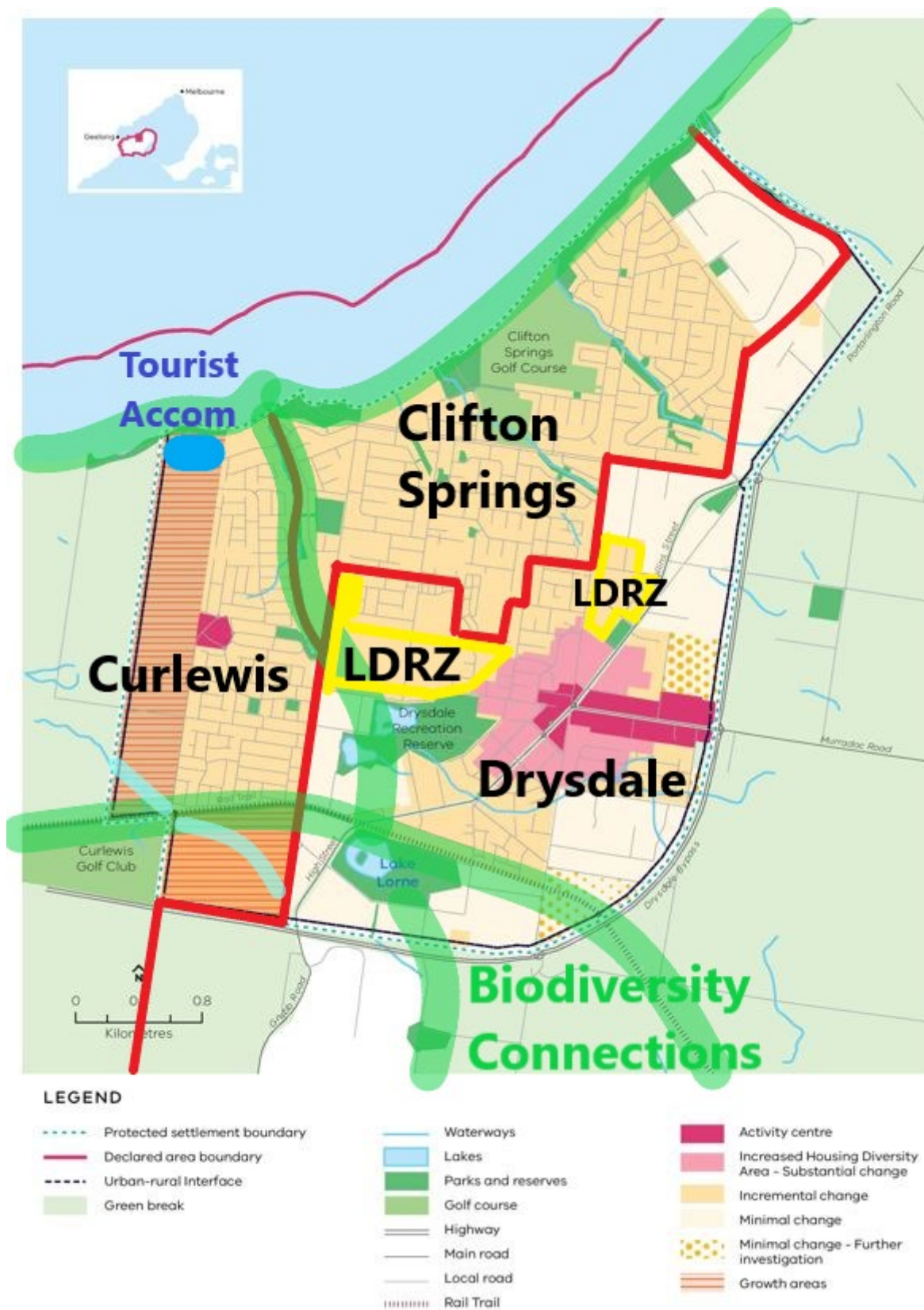


Image from Baie Wines website

Development of this location should benefit the whole region. It would be totally inappropriate for it to be zoned residential and for it to be only enjoyed by a fortunate few.

A designated waterway - Scarborough Creek (shown in light blue on Map 9), passes through the southern part of the residential growth area. This will be beautified and preserved as public open space,

Map 9 Proposed Drysdale-Clifton Springs-Curlewis settlement area boundary.



Source: DELWP

Further comments and background information.

Foreword

With the implementation of the DAL legislation, the planning policy of The Bellarine will move away from the creation of smaller-lot-size “dormitory suburbs” at locations where residents have to commute long distances through an increasingly congested road network, and also contribute to the traffic passing through or around an increasingly congested Geelong, to get to their place of work.

The distinctive area and landscape of The Bellarine will be protected for future generations and will become an internationally-recognised ecotourism and recreational destination with associated benefits to all of Victoria.

A more sustainable policy, consistent with the DAL classification, will be implemented that will protect and enhance the Bellarine’s environmental, cultural, heritage and recreational attributes, and its wildlife. This will also encourage a year-round ecotourism and visitor economy with associated local employment opportunities.

Appropriate planning will be implemented that will ensure that the residential population of The Bellarine is appropriate in consideration of the local employment opportunities, the transportation infrastructure and the Distinctive Area and Landscape of The Bellarine.

Specifically:

1. To only allow residential development within the defined settlement boundaries.
2. Development within defined settlement boundaries is to be a minimum lot size of 600 m² and not allowing building and hard surfaces to occupy more than 60% of the land surface. This is to:
 - preserve the character of the townships;
 - allow native wildlife to coexist;
 - facilitate an “urban forest” strategy to combat the problems associated with climate change: specifically, the “urban heat island effect” and flooding and problematic storm water run-off;
 - reduce congestion and preserve the liveability within the defined settlement boundaries.
3. To only allow low density residential development on the historic non-urban break between Clifton Springs and Drysdale.
4. To assign a value to the trees, vegetation and the wildlife when assessing planning applications.
5. To implement strategies to make The Bellarine more attractive to the tourist. These to include:
 - World-class sustainable ecotourism and wildlife attractions.
 - A policy to remove pest species (e.g. rabbits, foxes, feral cats, Indian Mynas, starlings) and to reinstate native animals.
 - A policy to increase and promote the number of activities that are attractive to the tourist: - an inter-connected system of walking and cycling trails, water activities, golf, wineries, wedding venues, wildlife parks, promotion of historic heritage attractions, promotion of scenic vistas, a lookout on the highest point of the Bellarine, a Bellarine Scenic Route to be promoted as an extension of the Great Ocean Road, theme parks, cultural and art events, sporting activities, public and roadside art, beautification of road and other infrastructure, etc.
6. To ensure The Bellarine is easily accessible to the tourist and, by providing more visitor accommodation, to foster a visitor economy and provide employment locally.

I recommend that an additional Risk be added under Human Impacts –

Impact of Population Increase

Both The Bellarine and Geelong are suffering as infrastructure is not keeping pace with the ongoing high level of population growth.

Map 3: Proposed Bellarine Peninsula declared area framework plan

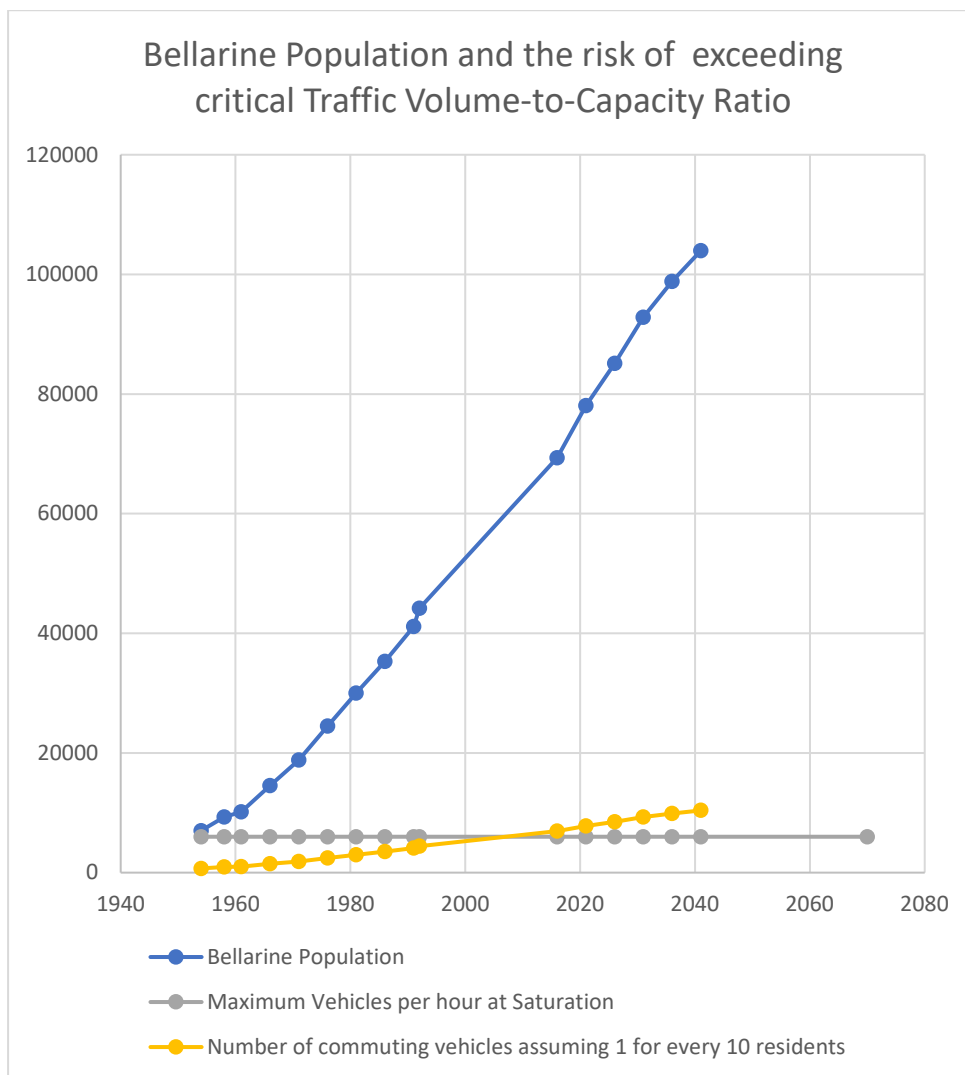


The Bellarine peninsula is particularly vulnerable to accessibility problems due to population increase because, as Map 3 shows, it has a bottlenecked traffic infrastructure system and is accessible by only 3 roads which each have limited finite traffic flow capacity.

An examination of austroads publications indicates that an average busy signalised intersection would have a straight through capacity of between 1,000 to 1,800 vehicles per hour per lane dependent on a range of factors. For example, significant volumes of crossing and turning traffic, and a mix of heavy vehicles, with slow acceleration rates, reduces capacity. It is a reasonable assumption that each lane on the signalised roads in question would have a capacity of 1,400 vehicles per hour. This means, for example, that about 35 vehicles per lane can get through the lights every 90 sec cycle time. The 36th vehicle has to wait for the next green light.

1. Portarlington Road is a 4-lane dual carriageway which would have a capacity of approximately 2,800 vehicles per hour of traffic to and from the Bellarine. This route also directs traffic through the 40km/h school speed zone past Geelong High School which would also reduce through capacity.
2. Bellarine Hwy also would have a capacity of approximately 2,800 vehicles per hour and passes through two 40 km/h school speed zones: past the Leopold Primary School and past the Newcomb Secondary College. These would also reduce through capacity.
3. The road through Barwon Heads. Optimistically, the single lane road through this coastal town would have a capacity of approximately 700 vehicles per hour and significantly less during holiday periods due to the presence of pedestrians. This route directs traffic through the 40km/h school speed zone past Barwon Heads Primary School.

Thus, the Bellarine traffic infrastructure has a critical traffic volume-to-capacity ratio and, even with traffic flows ideally balanced, the absolute maximum number of vehicles that can enter or exit the bottlenecked area of The Bellarine where essentially all the settlements are located, would be in the region of only 6,000 vehicles per hour. With traffic volumes above this available capacity, excessive delays and queuing will occur. The proposed Geelong Ring Road Extension (Bellarine Link) will make little difference to this concern. It will, however, increase delays on the Bellarine Highway, the Barwon Heads Road, the Torquay Road and the Anglesea Road.



This graph has been constructed from population data taken from the CoGG website and indicates the concerns that: -

The Bellarine has been experiencing higher-than-average growth for the last 50 years.

The CoGG intends that this higher-than-average growth will continue for the next 20 years.

Over this 70-year period there will be no increase in capacity of its bottlenecked road systems.

By the year 2040 there will be potentially 10,000 vehicles per hour wishing to commute through the bottlenecked road system that can accommodate only about 6,000 vehicles per hour. This concern may be expressed by the example that if, due to a continual increase in population, at some year in the future, 4,000 vehicles per hour wish to travel along a road to Geelong that can only accommodate 2,800 vehicles per hour, at the end of the hour there will be 1,200 vehicles queuing at traffic lights.

Families are moving to The Bellarine and commuting to Melbourne for work. The Bellarine is lacking a land based public transport system that is independent of the road system. Even to access the Geelong/Melbourne train, these commuters have to pass through the road bottleneck. Increasing the population of The Bellarine with residents that commute to work elsewhere will inevitably cause excessive delays that, especially when combined with the visitor and other traffic (e.g. heavy vehicles), will overload the bottlenecked traffic system. It will also have a highly detrimental effect on the congestion within the City of Greater Geelong and make it less pedestrian-friendly and less liveable.

The associated inefficiency and pollution will not be consistent with sustainable development goals with respect to clean air and climate change impacts. It will also render The Bellarine less accessible to tourism and detrimentally impact the associated visitor economy

This concern also has significant safety aspects:

1. Each of these 3 routes direct high volumes of traffic through 40km/h school zones.
2. There will be an increase in injury on our roads as each commuting vehicle increases the number of vehicle-to-vehicle, vehicle-to-cyclist and vehicle-to-pedestrian conflicts at which, should a collision occur, there is a significant risk of serious injury.
3. If for any reason (e.g. bush fires, tsunami warning) Bellarine residents all wished to exit The Bellarine at the same time, it would create an impossible situation.

I recommend that new road infrastructure should have to successfully pass through an "Evidence Based Approval Process" prior to being granted approval.

Details of the "Evidence Based Approval Process"

- a. Appropriate Topics are identified: - e.g. 1. Safety. 2. Traffic Efficiency. 3. Environmental Impact. 4. Cost. Etc.*
- b. Objectives are established for each topic.*
- c. These objectives are converted into "measurable engineering units" and Targets are established based on Project Objectives, community expectation and "Best Practice".*
- d. Data/evidence is presented in "measurable engineering units" reporting as to whether the proposed design meets the targets required.*

This process has the following advantages: -

- a. It ensures that important topics such as safety are individually and fully addressed*
- b. It ensures that topics are reported on in clear data/evidence-based engineering units and not by unsubstantiated assertion.*
- c. It enables clear comparison between alternative project options facilitating easy decision-making.*
- d. It ensures that projects are not approved without meeting the required "Targets".*
- e. It enables a process of continual improvement towards "World Best Practice".*

20/8/2021