



Point Lonsdale Civic Association Inc.

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Representing Point Lonsdale Residents since 1910

12/8/2021

To. Planning Implementation DEWLP (planning.implementation@delwp.vic.gov.au)

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BELLARINE DISTINCTIVE AREA AND LANDSCAPE LEGISLATION PHASE III PUBLIC ENGAGEMENT PROCESS PLCA SUBMISSION – DRAFT BELLARINE PENINSULA STATEMENT OF PLANNING POLICY

In response to DELWP's invitation to provide comments on the Draft Bellarine Peninsula Statement of Planning Policy (SPP) the Association provides the following ideas and suggestions for your consideration.

Summary

In accord with other Bellarine Community Associations and organisations PLCA strongly endorses DELWP's Draft SPP, in particular:

- The Vision Statement, which we believe should be made binding on all Responsible Public Entity's (RPE's)
- The application of permanent protected settlement boundaries around all Bellarine Peninsula towns and villages in their current location as shown in CoGG Settlement Strategy, and Township Structure Plans. We suggest however like the term "Green Zones" used for agriculture and farmland be re-introduced when referring to the non-urban settlement breaks.
- Retaining the existing farmland/agricultural land in the hinterland of the Bellarine and along the Bellarine Highway.

- Support for designating Leopold, Ocean Grove and Drysdale/Clifton Springs as future growth areas
- The Association fully supports the Protected Settlement Boundaries for Point Lonsdale and Ocean Grove (eastern boundary being Banks Road) and suggests that once the SPP is approved that Point Lonsdale's Structure Plan and the Borough of Queenscliff's Planning Scheme be updated to reflect all the changes contained in the SPP and its supporting documents.
- The State Significant Coastal Strip from the eastern tip of Queenscliff to Breamlea.
- Proposed Zoning changes GRZ to NRZ and VPO changes for Point Lonsdale contained in supporting documents. However we wish to reinforce our support for the retention of Borough's current 2 storey x 8.5 metre building height limit for our residential areas and single storey 6 metre limit for the Fisherman's Flat historic precinct.

Some concerns with the SPP:

Some vague, non committal and ambiguous language is used by DELWP which we see as a problem going forward - DELWP indicated at a recent meeting that if possible this would be looked at to strengthen the wording. DELWP have also acknowledged there were drafting errors in the Maps, which need to be corrected and the large extractive industry interest areas are dated (2000). DELWP indicated that Government is reviewing and updating these designated extractive industry areas, including those that lie between Point Lonsdale and Ocean Grove.

Once approved the objectives are binding on the RPE's however the Association is disappointed the strategies in the final Bellarine Peninsula SPP are not binding, they are only recommendations to which the RPE's must have regard. It would have been better if the strategies, which are apparently "performance based", had more planning weight and were more prescriptive. If this is not possible PLCA suggest expanding the objectives to include key points contained in the strategies.

Not much is said in the SPP about the hinterland areas of Mannerim, Marcus Hill or the environmentally sensitive Burnt Point rural living area, which is the only rural area in the Borough of Queenscliff. The SPP has made little mention of Moremac owned farmland and Commercial 2 zoned areas west of Fellows Road and north of the Bellarine Highway or of Swan Island owned by the Department of Defence. Sand Island, part of which is zoned SUZ, and its environmentally sensitive lagoon system is also not mentioned in the SPP.

Critical to Point Lonsdale and Queenscliff is the retention of farmland at Marcus Hill (sometimes called Wilson's Hill or Suma Park Hill) with its sweeping view lines across The Heads, Swan Bay, Point Lonsdale, Queenscliff and adjacent farmland. The Association believe that Marcus Hill and the escarpment surrounding Swan Bay Catchment should remain farmland and not be subdivided for residential or other uses such as wind turbines.

Background

PLCA have been actively involved with the Bellarine DAL process and discussions with CoGG Strategic Planners about retaining green coastal spaces between our townships for a number of years. We are very pleased that DELWP, together with the 2 Bellarine Councils, relevant government agencies and the Member for Bellarine have now produced this important document that will help protect the Bellarine's areas of outstanding natural beauty, environment, economic, social and cultural heritage significance. There will no doubt be submitters who want key sections of the SPP diluted or altered to suit their own purposes. We would urge DELWP and the final decision makers (The Planning Minister and Governor in Council) to resist changes that do not align with SPP's 50 year Vision for the Bellarine.

Response to Draft Bellarine Peninsula Statement and Planning Policy

The Association agrees with the declared area and notes the seaward boundary extends 600 metres from the low water mark which is important for our Borough given we are effectively surrounded on 3 sides by water. Adjoining the Borough are key parts of Port Phillip Heads Marine National Park including Swan Bay and the waters surrounding Point Lonsdale (including Victory Bight).

One further idea for consideration:

Geelong Environmental Council and Queenscliffe Environment Forum's proposal for a Bellarine Wetlands Nature Conservation Reserve. The Conservation Reserve would ensure the 19 individual wetlands (large and small) on the Bellarine Peninsula are protected and conserved at a time of higher population growth and greater climate uncertainty. The ultimate aim would be to bring all the Bellarine wetlands into a single State Significant Reserve.

Page 15 Implementation by Responsible Public Entities

The Association is pleased that once the Bellarine Peninsula SPP is approved, it will come into effect immediately and will be taken to form part of the standard provisions of the Victoria Planning Provisions. However, the Association believes it's very important that the implementation stage to give effect to the SPP needs to be made clear. The SPP, once approved will mean changes to both CoGG's and BoQ's Planning Schemes (Planning Scheme Amendment) and Town Structure Plans (Queenscliff has no Structure Plan but Point Lonsdale does). Currently there is no Schedule, no designated resources or specific time frames mentioned in the SPP. An ongoing Implementation Plan and resources are going to very important if the changes are not going to drag on for years. Hopefully the implementation phase will also mean a number of Queenscliffe Borough Council initiatives including the long-awaited Heritage Review, Urban Character Study Review and Coastal and Marine Management Plan can be finalised.

Page 17 Monitoring and Review – the Association believes SPP reviews should not be conducted for at least 10 years.

Pages 20 and 21 Our Vision

The Association supports the 50 year vision which seeks to ensure the area's special values and distinctive attributes are protected and enhanced and are not degraded over time. Given our geographic location on the eastern tip of the Bellarine, the Association are especially supportive of the environmental initiatives for *the declared area including 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*. In our view the vision empowers the community, local and state government and other parties to work towards a common goal for the Bellarine. The Objectives (binding) and Strategies (non-binding) should link directly to and reflect the Vision.

The Association supports the BCH submission and would like specific references to "green breaks" between non-urban settlements re-inserted. To read *"well defined settlement boundaries protect the prized coastal and rural hinterland landscape of the declared area, and the areas between settlements are retained as green breaks used principally for agricultural and non-urban purposes"*

Pages 22 and 23 Declared Area Framework Plan

Map 3 shows the proposed Bellarine declared area framework plan

The Association generally agrees with the framework plan and notes both Point Lonsdale and Queenscliff are deemed villages. Its pleasing that the coastal strip from the eastern tip of Queenscliff to Breamlea has been designated a State Significant Landscape (Bellarine Peninsula South Coast).

The Association makes the following observations about the framework plan.

The Green Breaks should not include further nature-based tourism land uses, which invariably want to be located on the ridgelines of our best coastal landscape areas or used for large extractive industries that harm rather than protect and enhance significant landscape features. Green breaks should be primarily for agriculture uses.

It seems inconsistent that Swan Bay, which is an internationally recognised RAMSAR migratory bird area, key part of the Port Phillip Heads Marine National Park and important fish nursery is only listed as regionally significant.

Lakers Cutting which is a largely man made waterway (coloured white on the Map) should become part of part of Swan Bay and hence part of the Port Phillip Heads Marine National Park. PLCA have been advocating for this for many years.

Only a part of Swan Island is used for as a Golf Course – a large part of the island is a Commonwealth Military Training Base.

Page 24 Policy Domains

The Association generally supports the objectives found in each of 8 policy domains resulting from previous community engagement and technical studies undertaken by DELWP.

Environmental Risks and Resilience

The latest UN Climate Report puts the world in a Code Red situation with the increasing likelihood of more extreme temperatures, bushfires, storms, rising sea-levels, coastal erosion and flooding resulting from man made greenhouse gases. The Association therefore supports the Objective 1 and the Strategies 1.1 to 1.11 however we suggest the inclusion of a tree canopy coverage target as follows:

1.10 Maintain and increase vegetation tree canopy cover in towns and villages with a target of 30% across the declared area to aid carbon sequestration and to reduce heat island effects in urban areas.

Landscapes

PLCA agrees with Objective 2 and Strategies on page 33, however as indicated above we have concerns about expanding tourism developments and natural resources purposes (extractive mining uses) in green breaks mentioned in Strategies 2.3 and 2.4. The Association is happy with Maps 4 & 5

Environment and Biodiversity

The Association agrees with Objective 3 on page 38 and Strategies 3.1 to 3.8. The Association is also supportive of Map 6 on page 39.

In relation to Map 6 the Association suggests:

The bio-diversity of the Borough of Queenscliffe could be further enhanced if the Port Phillip Heads Marine Park was expanded at the southern end of Port Phillip Bay, Point Lonsdale foreshore woodlands were maintained and enhanced, Buckley Park protected, nutrient levels into Lakers Cutting and Swan Bay from a large canal development are kept to prescribed levels, a re-wilding of low lying Council owned land in Murray Road took place and all of Sand Island and its lagoon system together with local parklands were returned to conservation zoning.

Aboriginal Cultural Heritage – Wadawurrung Country

The Association agrees with the Objective 4 and Strategies 4.1 to 4.3 listed on page 41

Historic Heritage

The Association supports the Objective 5 and the Strategies 5.1 to 5.4 listed on page 43, however we believe the Heritage values of Queenscliff village needs to be greatly enhanced. The following suggestions are provided for your consideration:

- Strengthening the heritage planning provisions for historically significant Fisherman's Flat (currently under threat from owners/developers) and the Queenscliff's main heritage precinct in and around Hesse Street where many of our key Victorian and Edwardian buildings are located.
- Completing Queenscliffe Council's long-awaited Heritage Review, also the Borough's Urban Character review and finalisation of the Significant Tree Register and Tree Policy.
- Providing greater planning protections for Queenscliff's Botanic Park and Botanic Gardens Precinct, and Shortland's Bluff including Queenscliff Lighthouse Reserve.
- Complete the refurbishment program for the Point Lonsdale Maritime and Defence Precinct.
- Retain the viewing lines and streetscape vistas from the main shopping centres and coastal car parks to the sea. Historically these have been such an important feature of the Borough's townships.
- Building heights should be limited to 2 storeys or 8.5 metres maximum with 40% site coverage.
- Greater protection of both the inside and outside of key heritage buildings – currently owners of many heritage buildings are able to gut the interiors effectively leaving just the outside shell with a little left of the original buildings.
- Encouraging the restoration of the "A" Listed historic Fort Queenscliff and should Dept. of Defence leave some time in the future promote it's adaptive reuse as a knowledge based centre.

Tourism Agriculture and Natural Resources

The Association generally agrees with the Objectives 6a and Strategies 6a.1 to 6a.6 subject to our previous concerns about the location and expansion of new tourism developments and extractive industries on the Bellarine. The Association generally supports the Objective 6b and Strategies 6b.1 to 6b.6 – ideally we would see the green breaks used for agricultural and farm related uses so we have concerns about protecting extractive resource areas and operations contained in Strategy 6b.7.

Map 7 – the Association suggests that the extent of the designated Extractive Industries Interest Areas across the Bellarine be reviewed with specific attention paid to the extensive area between Ocean Grove and Point Lonsdale and around Lake Victoria, which is an important migratory bird feeding area. DELWP have indicated a review by the appropriate agency will be forth coming – hopefully this translates into an amended Map 7.

We remain concerned that the Green Breaks are designated potential locations for natural resources and tourism uses, as above we see these areas as primarily for agricultural and farm based uses.

As previously indicated Swan Island is mainly an operating military training base with a public golf course on the west side. Swan Island has a rich military history (refer recent Prof Garden Study), which includes a remnant fort the eastern side, mini docking facility and access channel at the northern end servicing the facility.

Strategic Infrastructure

The Association agrees with Objective 7 and the Strategies 7.1 to 7.7 on page 50

Given the rail reserve between Queenscliff, Drysdale and South Geelong still exists should consideration of a future light rail facility remain a possibility for the Bellarine.

Settlement Boundaries

Our Association is also aware of and supports the submissions, which have been prepared by the Geelong Field Naturalists, and Friends of the Ocean Grove Nature Reserve, The Geelong Environment Council, the Queenscliffe Community Association, and the Swan Bay Environment Association.

North up to Bellarine Highway

The Bellarine Highway is a major route for both tourists and residents accessing Ocean Grove, Point Lonsdale and Queenscliff.

The Association believes it is important that the existing rural vistas along the Bellarine Highway be retained. We suggest that the areas identified as having important “Road Corridor Views” in the framework plan could be subject to further consideration by DELWP and the Council(s) of the need to apply Significant Landscape Overlay provisions in the Planning Scheme to ensure their protection.

East of Banks Road

Our Association is also aware of and supports the submissions which have been prepared by the Ocean Grove Community Association in this aspect of the Draft SPP.

Our Association has always viewed Banks Road as being the eastern boundary of Ocean Grove. Any encroachment into the green break between Ocean Grove and Point Lonsdale, in our view is not acceptable.

This Green Wedge area’s landscape significance and characteristics and its sensitive environmental qualities are highly valued by the local community.

As noted, the Association supports the proposal to pull back the existing boundary at the two locations at the Banks Road/Shell Road intersection and further south in Bonnyvale Road, and extend to the corner of Banks Road for the reasons set out in the draft SPP.

Housing Change Areas

The Association supports the hierarchy of settlements as described in the SPP.

The Association supports the notion that no more land in Point Lonsdale is acceptable for further sub division – after land at The Point and Point Lonsdale Golf Club Estate has been exhausted. It also accepts the statement in the draft that Queenscliff is a “minimal change area”.

Our Association will be pleased to participate in any future review by DELWP, to ensure that even greater attention is given to protecting and enhancing the Borough’s coastal character as described in the Background Paper. In addition the Association looks forward to working closely with DELWP and Councils in the future to ensure the objectives of the approved SPP are achieved and where necessary, changes made to the Queenscliffe Planning Scheme, and the Greater Geelong Planning Scheme.

Settlements

The Association agrees with Table 2 on page 52 entitled Proposed Hierarchy of Bellarine Peninsula declared area settlements, which amongst other things identifies Drysdale-Clifton Springs, Curlewis, Leopold and Ocean Grove as district towns and Barwon Heads, Indented Head, Point Lonsdale, Portarlington, Queenscliff and St Leonards as villages with smaller populations.

The Association agrees with the Objective 8 on page 59 and Strategies 8.1, 8.2, 8.3, 8.5, 8.6, 8.7, 8.8, and 8.9. We are not supportive of Strategy 8.4. Given the very low projected population growth in the Borough and the heritage importance of the Hesse Street precinct, intensifying residential development along the main commercial spine of Queenscliff may have a detrimental affect on the existing streetscape.

Map 14 on page 65 Proposed Point Lonsdale Protected Settlement Boundary

The Association agrees with the proposed settlement boundary delineated in Map 14 however we point out that the urban area north of Bellarine Highway to Fellows Road including the rural living area at Burnt Point (large area coloured white) is actually Queenscliff.

With possible rezoning from GRZ to NRZ in Point Lonsdale and other changes recommended in the SPP supporting documents we raise the possibility of the residential areas in “Old Point Lonsdale” (Williams Road southward) being Minimal Change only rather than Incremental Change.

Map 17 Proposed Queenscliff Housing Change Areas page 68

The Association recommends that Minimal Change residential area extends across the entire township rather than having the town split into Minimal and Incremental Change when the entire township is zoned NRZ anyway. We would also suggest that the entire township has heritage overlay rather than a series of precincts east of Stevens Street.

Suggest the important green break and coastal space that divides the two villages through The Narrows including the Avenue of Honour to “The Springs” be shown. This area has been the subject of a number of important VCAT cases involving attempts to introduce multi-level housing.

The area at the southern end of Hesse Street beyond King Street is actually a designated Special Use Zone (including gaming machine and liquor outlet) as is the coastal strip directly north of the Harbour Cut (coloured white). Not sure why the Hesse Street/King Street site appears in a map designated Proposed Queenscliff housing change areas.

Suggest the waterways in and around Queenscliff harbour and the entire Sand Island area with its environmentally sensitive lagoon system be rezoned PCRZ.

The proposed Designated Activity Centre in Hesse Street, which has key Victorian and Edwardian buildings and 2 large commercial sites awaiting redevelopment, needs further investigation and appraisal given the precinct’s heritage importance to Queenscliff.

Thank you for the opportunity to comment on the Draft Bellarine SPP



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