



PO Box 235, Portarlington VIC 3223 [pca.portarlington@gmail.com](mailto:pca.portarlington@gmail.com)

19 August 2021

## Submission - draft Bellarine Peninsula Statement of Planning Policy

### Summary

The Portarlington Community Association (PCA) strongly supports the State Government's initiative in preparing and approving a Statement of Planning Policy (SPP) for the Bellarine Peninsula consistent with the undertaking by the Hon Richard Wynne in his media release 27<sup>th</sup> September 2018.

It is noted this undertaking was supported by the Declaration of the Bellarine Peninsula as a Distinctive Area and Landscape, gazetted Tuesday 29 October 2019.

The PCA is pleased to see that the following policy domains are backed with binding objectives, and strategies, to achieve:

- Environmental risks and resilience
- Landscape
- Environment and biodiversity
- Aboriginal cultural heritage – Wadawurrung Country
- Historic heritage
- Tourism, agriculture and natural resources
- Strategic infrastructure
- Settlements

The PCA recognises that there is a Statutory Approval Process for the SPP which is both time consuming and complex.

This approval process for the SSP without interim controls may allow the pursuit and approval of development proposals which adversely impact the integrity of the SSP in its final form.

They would also impact adversely on our coastal villages such as Indented Head and Portarlington.

The PCA therefore strongly advocates for interim controls to be put in place until the SSP has been approved.

### Issues to be addressed

1. The SPP in its present form, does not set out specific/quantitative performance standards. Qualitative type objectives allow a considerable breadth in interpretation. For example,

'development should proceed generally consistent with the identity and character of the individual township' – the word **generally** should be deleted.

Whilst this is one of the objectives of the current "performance based" planning controls it is also one of the confusing elements in the SPP which is not well understood by many community members and thereby reflects a major weakness in the policy.

It is acknowledged that local policies attempt to be more specific however they are also constrained by the lack of specificity in the SPP.

2. The draft SPP provides a policy framework to guide management and development of the area **generally** including the settlements.

From a local perspective, planning controls, which can be both performance based and qualitative, need to be more specific. This would enhance the capacity of local residents to understand and constructively participate in the planning process.

In the event there is justification for additional flexibility which can be provided through a site specific amendment.

This would also ensure the developments meet the sustainability objectives relating to the environment, with developments "sitting within the landscape" as opposed to on the landscape.

3. The designation of Villages and Townships does provide some level of comfort in identifying the role of the settlements in a hierarchical sense, for example the villages of Indented Head and Portarlinton are recognised and defined as villages being small settlements with low population that are not identified as growth areas. It is suggested that the words are made consistent with the existing low profile and density of developments.
4. The Bellarine Settlement Background Paper (informed by the Bellarine Peninsula Township Character Report) has a number of proposals to amend the zones for villages such as Portarlinton and Indented Head and these should be mandated as part of Objective 8 on page 58.
5. The significance and character of the landscape and the iconic views from the coastal villages of Portarlinton, Indented Head and St Leonards should be protected as should the views from the Bay to the villages.

The commentary on Page 31 of the SPP, relating to these features and views should be enhanced.

Controls required to protect these views and features should be developed and incorporated in the SPP.

There is a need to identify a management regime which not only focusses on the protection of the views but also on the need for a sharing of views which are a public asset.

6. The commentary on Page 52 relating to Settlements and in particular the areas of Indented Head and Portarlington requires amplification and clarification to clearly identify the role of the villages and the character of each village, such that the development is required to be consistent with the character of low profile residential and mixed uses which predominates the nature of these villages.

The current trend of applications is challenging the fundamental character of the villages.

7. There is a need to identify significant view cones and tree-lines especially in the Portarlington hinterland but also across the whole Peninsula.

The designation would also assist in identification of additional opportunities for bio-links connecting areas of landscape significance.

8. Planning is about communities as much as it is about development. Changes which clarify processes and property rights and opportunities will enhance planning outcomes and ensure engagement of communities. Designation of performance standards such as clearly stated building heights, for example, will enhance the process and avoid dissent in communities and in the building and development industry.

Having regard to the backlog of cases at VCAT and to a lesser extent with Panels Victoria, the Planning process is currently unsustainable and initiatives such as the SPP will only assist if specificity is provided.

## Conclusion

The PCA provides these comments supporting and recognising the significant work carried out to date in preparing the draft SPP.

This document once approved will signify a landmark improvement and change in the Planning framework for this area for decades to come. This change should signify a change to the adversarial nature of planning for the future generations of residents in this area.

The PCA is ready to assist in this process and provide constructive input on behalf of our community.

## Appendix A – Inconsistencies

A list of general inconsistencies to be addressed

1. Page 57 – Assumed mistake “...contributes to **poor** Portarlinton’s coastal character and identity...”
2. Map 15 (page 66) Point Richards Flora and Fauna Reserve shown to occupy the Portarlinton Recreation Reserve.
3. Map 15 (page 66) missing scale marker.