

## Submission on the Draft Bellarine Peninsula Statement of Planning Policy

1. I make this submission on behalf of the Friends of Edwards Point Reserve Inc, a volunteer group from St Leonards which works in liaison with Parks Victoria to maintain and protect Edwards Point Wildlife Reserve.
2. We note in general that many important issues are addressed as “strategies” and are thus not binding on Responsible Public Entities. We consider this a weakness of the SPP overall.
3. We submit in particular that strategy 2.2 ‘Protect the coastal and hinterland settings of settlements by containing urban growth and development within settlement boundaries’ should be made binding to prevent greenfield town boundary creep, resulting in residential development through planning scheme inconsistencies and property development advocacy and influence which will result in irreversible environmental damage and loss of the unique and critical Bellarine town and village characteristics.
4. We welcome the recognition of the Swan Bay landscape as one of regional significance. However, given its proximity to and integration with the Ramsar convention listed Swan Bay Wetlands, we submit that *the Swan Bay landscape should more appropriately be recognised as being of State Significance*. As noted elsewhere in the SPP, this is a site of international significance. It should therefore be accorded the highest level of recognition (and protection) possible under this policy.
5. We support the inclusion and apparent intent of Objective 3 ‘To conserve and enhance the significant biodiversity, ecological and environmental values of the declared area.’ We support the inclusion of strategy 3.7 ‘Utilise Wadawurrung biocultural knowledge and practices in the management of biodiversity and ecological and environmental values.’
6. We submit that strategies 3.5 ‘Discourage use and development that would impact or threaten the health and function of areas of identified biodiversity and ecological value including biodiversity connections’ and 3.6 ‘Minimise downstream stormwater impacts by implementing integrated, sustainable stormwater management practices (such as the harvesting, reuse and recycling of water) including the consideration of cumulative impacts on waterways and natural ecological processes’ are critical to the achievement of Objective 3 and should be made binding on RPEs.
7. We support the inclusion of strategies 6a1-4, to the extent that these are observed and will contribute to the establishment and maintenance of a sustainable and responsible visitor economy that helps protect the significant environmental and landscape values of the declared area, as per Objective 6a.
8. We support the intent of strategies 7.1 ‘Design infrastructure that is sympathetic to and strengthens the preferred settlement and landscape character, natural environment and biodiversity values by maintaining view lines from existing and new transport corridors, retaining remnant vegetation and providing appropriate vegetation’ and 7.2 ‘With the Wadawurrung, ensure the provision, maintenance and upgrading of infrastructure protects, conserves and enhances places of Wadawurrung living cultural heritage significance’. However, we note that they are not binding on RPEs and submit that they should be made so.
9. In relation to “Settlements”, we strongly endorse the statement that “Development within all settlements should apply best-practice, environmentally sustainable design and development principles. This includes supporting energy and resource efficiency, minimising car dependency, reducing stormwater run-off and promoting waste reduction and recycling throughout the design, construction and operation phases of developments.” However, we note that it is little more than a motherhood statement and does not appear to be given full or meaningful effect in any binding provisions of the SPP.
10. With specific reference to St Leonards, we strongly contest the statement that St Leonards ‘...functions mainly as a holiday village and accommodates a small and modestly growing permanent population.’ We submit that this is incorrect, as large housing developments recently built and

currently under construction will easily double the population of St Leonards as at the 2016 census. We submit that this should be reviewed and corrected.

11. We appreciate the sentiment of the statement that ‘Incremental development within residential areas to the north and south of the village will integrate appropriately with sensitive natural interfaces including the St Leonards Salt Lagoon and Swan Bay – Edwards Point Wildlife Reserve’. However as observed above, we suggest this is largely meaningless and has the potential to be completely ignored, resulting in the irreversible destruction of the fragile structure of Edwards Point’s and Swan Bay’s sensitive and critically interconnected environment. We submit this should be incorporated in the binding provisions of the SPP along with strategies 2.2 and 6b3.

12. We submit that in order for Objective 8 to be meaningful and allow the achievement of most of the other objectives and strategies in the SPP, clearly defining and implementing protected settlement boundaries, as referenced in strategies 8.1 and 8.2 **must** be enshrined in law and be wholly binding on all relevant entities.

13. That said, we support the intent of Objective 8 ‘To plan and manage the sustainable development of settlements in the declared area consistent with each 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’.

14. We object strongly to the inclusion in strategy 8.4 of “identified greenfield development areas”. We submit that further greenfield development should be expressly precluded under the SPP.

