



15 July 2019

6 Parliament Place
East Melbourne
VIC 3002

Mr Steven Hines
Department of Environment, Land, Water and Planning
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Re: Distinctive Areas and Landscape Program—Bellarine Peninsula

Dear Mr Hines,

The National Trust of Australia (Victoria) appreciates the opportunity to provide feedback on the proposed Bellarine Peninsula Distinctive Area and Landscape declaration. This submission has been prepared jointly by National Trust staff, and representatives of the National Trust Geelong & Region Branch.

Background

The National Trust is the state's largest community-based heritage advocacy organisation actively working towards conserving and protecting our heritage for future generations to enjoy. The Geelong & Region Branch is the premier advocate for heritage conservation in the region, and represents more than 500 local National Trust members.

We strongly support the declaration of the Bellarine Peninsula as a Distinctive Area and Landscape under the *Planning and Environment Act 1987*, and the preparation of a Statement of Planning Policy. This process will be important to guide the future of this region, which is valued locally, nationally, and internationally, for its natural, cultural, social, scientific and Indigenous values.

We understand that consultation will be undertaken with Traditional Owner groups including the Registered Aboriginal Party, the Wathaurung Aboriginal Corporation. The National Trust advocates for this process to begin as early as possible in the project, and should inform the proposed declaration of the area as a Distinctive Area and Landscape, and every stage of policy development. Any assessment of Aboriginal values should not only consider historic values, but ongoing cultural attachments to Country.

We also understand that a number of technical reports are being undertaken to inform the planning process. We request that these studies are made publicly available to inform future consultation, and to provide an opportunity for stakeholders to meaningfully respond to the draft Statement of Planning Policy.

With respect to the development of the Statement of Planning Policy, we advocate for the statement to clearly document and assess landscape character, values and significance as well as the location and extent of significant landscapes/view lines/features. This will assist to inform future planning scheme amendments, land management, and decision-making by Responsible Authorities and the Victorian Civil and Administrative Tribunal.

Existing Landscape Protections

The current Significant Landscape Overlays on the Bellarine Peninsula are listed in the Background attachment.

The recommendations, such as the nine significant coastal areas, and connected inland areas, identified in the *Coastal Spaces Recommendations 2006* report by the Victorian Government Department of Sustainability and the Environment, have informed present landscape protections through Planning Scheme amendments and other strategies. (See Background Attachment.) This work should be taken into consideration as part of the Distinctive Areas and Landscapes process.

The following six objectives, and strategies for implementation, framed in the *Bellarine Peninsula Localised Planning Statement 2015*, are also still entirely relevant. (See Background Attachment.)

- *protect and enhance the rural and coastal environment and scenic qualities of key landscape features and maintain non-urban breaks;*
- *support the ongoing use of rural land for agriculture and to preserve the open farmed landscape, including discouraging intensive agriculture activities or industry that would have an adverse impact on the rural landscape;*
- *preserve and maintain the ecology of environmentally significant coast, wetland and vegetated areas; and*
- *support and encourage diverse and sustainable tourism as a key economic activity in rural areas where it complements and respects the farmed rural landscape, does not impact on existing farming activities and contributes to the local economy.*

Planning Issues in the Bellarine Peninsula Region

The Bellarine Peninsula comprises a combination of built, rural and natural landscapes. Local and State Governments have considered the management of this area for many years, in efforts to maintain a balance between these landscapes.

Concerns about encroachment of housing developments into rural landscapes has been expressed by National Trust Branch members at meetings this year, and the same subject has been discussed at the City of Greater Geelong Heritage Advisory Committee.

The current DELWP distinctive landscape program centred on the Bellarine Peninsula, is therefore a welcome engagement, to reinforce again, the importance of protecting natural environments, cultural and heritage places, and landscapes and scenic views.

During a time of intense growth in the region, G21, an alliance of five municipalities, including City of Greater Geelong and Borough of Queenscliffe, and the two councils themselves with jurisdiction on the Bellarine Peninsula, are planning for growth of population increase and hence the need for housing. Although Greater Geelong has decided that growth areas in the municipality should be to the north and the west of the City, there are sporadic subdivisions proposed, and permitted on the Bellarine Peninsula.

The National Trust believes the following should be considered in the development of the Statement of Planning Policy for the Bellarine Peninsula.

1. Settlement boundaries

Instigation of permanent designated township boundaries is urgent to guide urban development, and protect coastal and landscape values between settlements. Height and density limits within those boundaries are then required to protect the character of peninsular townships.

2. Strengthen local government heritage overlays and significant landscape overlays

Due to the pressure of development planning applications, there is a need for strict adherence to existing local government heritage overlays and significant landscape overlays. These overlays have at times been undermined and are at risk of being subverted. A review of the Bellarine to consider strengthening existing heritage overlays and significant landscape overlays, should be undertaken. A review of the area to consider additional planning controls which would be appropriate to protect the region's landscape values should also be undertaken.

3. Desist from allowing subdivision and housing on flood plains and coastal strips

The Geelong & Region Branch of the National Trust has observed an increasing number of planning applications which propose changes to the topography of the land. Satellite housing in the Greater Geelong municipality is rampant on low-lying land, and along river flood plains, such as the Moorabool River and Armstrong Creek. This has involved trucking in hundreds of tons of soil to change the natural topography and build up the land a metre or two. Massive drainage has occurred and countless 'Revocation of flood prone areas' motions have been passed at Council meetings. We have also observed the alteration of low lying coastal water areas by excavating land to create artificial waterway frontages to blocks, such as west of Point Lonsdale.

An investigation of this trend is needed with the objective of discouraging changes in topography which negatively impact on significant landscape and environmental values.

Queenscliff

The National Trust Geelong & Region Branch has attended public meetings and made submissions to Destination Queenscliff project in order to encourage appropriate management of the Queenscliff coastal area especially the Lighthouse precinct which was at risk of multi-storey accommodation development overlooking the Heads.

National Trust members living in the Borough of Queenscliffe have advised that the following considerations are crucial:

- Develop a study with the objective of the designation of an overlay across both sides of the Heads.
- Review Significant Landscape Overlay SLO1, Swan Bay (see Background Attachment) and extend to include adjacent distinctive waterways.
- Review and strengthen the specific individual heritage overlay for the Foreshore Park area, east of Gellibrand Street, north of the Fort and extending northwards to Fisherman's Flat, and including the jetty, currently under HO3.

- Review the heritage overlay which stops at Stevens Street, and extend the heritage overlay westwards to include the entire township of Queenscliff.

Conclusion

In conclusion, the National Trust, including our Geelong & Region Branch, strongly support the declaration of the Bellarine Peninsula as a Distinctive Area and Landscape. We hope the issues raised above will be considered during the next stage of the process, and look forward to further opportunities to provide feedback as this process progresses.

Should you have any queries about this submission, please don't hesitate to contact me on 9656 9802 or at felicity.watson@nattrust.com.au.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'F. Watson', with a long horizontal flourish extending to the right.

Felicity Watson
Advocacy Manager

Jennifer Bantow OAM
National Trust Geelong & Region Branch

Background Attachment

Coastal Spaces Recommendations, April 2006, Victorian Government Department of Sustainability and Environment.

https://www.marineandcoasts.vic.gov.au/__data/assets/pdf_file/0029/405938/CoastalSpacesRecommendationsReport1.pdf

State Significance

The Heads at Point Lonsdale

Regional Significance

1. Thirteenth Beach Coast
2. Lake Connewarre & Wetlands
3. Coastline between Clifton Springs and Portarlington (including Spray Farm)
4. Barwon River Estuary
5. Coast between Ocean Grove and Point Lonsdale
6. Swan Bay and Surrounds
7. Lake Victoria and Yarram Creek

Local Significance

Murradoc Hill

Bellarine Peninsula Localised Planning Statement, Councils of the City of Greater Geelong, the Borough of Queenscliffe, and the State Government Department of Environment Land Water and Planning, September 2015.

<https://www.geelongaustralia.com.au/planning/documents/item/8d1a46f84b71dc2.aspx>

Policy objectives and strategies

1. Objective

To protect and enhance the rural and coastal environment on the Bellarine Peninsula and maintain non-urban breaks with open farmed landscapes between settlements.

Strategies

- *Protect rural and coastal environments from inappropriate urban encroachment and development.*
- *Protect the scenic qualities of key landscape features.*
- *Ensure development outside of settlement boundaries (as shown in the Structure Plan maps) does not compromise the rural, environmental and landscape values of the non-urban breaks, significant views or longer term growth opportunities.*

2. Objective

To support the ongoing use of rural land on the Bellarine Peninsula for agriculture and to preserve the open farmed landscape.

Strategies

- Support the establishment and ongoing use of rural areas on the Bellarine Peninsula for agricultural activities which do not impact upon the open farmed landscape including viticulture, horticulture and crop raising and grazing.
- Discourage intensive agricultural development or industrial development in rural areas on the Bellarine Peninsula that would have an adverse impact on the rural landscape.
- Ensure the development of dwellings and the excision of existing dwellings in rural areas on the Bellarine Peninsula is consistent with the use of the land for sustainable rural uses.
- Ensure new development is designed and sited to avoid compromising the open farmed landscape.

3. Objective

To preserve and maintain the ecology of the Bellarine Peninsula's environmentally significant coastal, wetland and vegetated areas.

Strategies

- Protect cliff, dune and foreshore areas from inappropriate development and subdivision.
- Protect and restore significant and remnant native vegetation, particularly tea tree, moonah and coastal heath.
- Ensure that new development allows for the protection of significant vegetation and/or planting around buildings and has minimal impact on roadside vegetation.
- Ensure appropriate stormwater management measures are in place to avoid adverse impacts on marine waters, lakes, wetlands and waterways.

4. Objective

To protect, preserve and enhance built heritage, cultural and urban character values and preserve the individual identity and role of townships.

Strategies

- Ensure that development responds to the identity and character of the individual township in which it is located.
- Protect the character of local conservation precincts, places, objects and sites and heritage areas on the Bellarine Peninsula.
- Encourage development which respects the setting of coastal settlements by providing reasonable sharing of views of the coast and foreshore and uses contemporary design that reflects existing built form.

5. Objective

To facilitate the planned residential growth of Drysdale/Clifton Springs, Leopold and Ocean Grove, consistent with adopted Structure Plans and as service hubs for the Bellarine Peninsula. In all other townships, provide retail, commercial and community uses and facilities that serve the daily needs of the community and encourage street based activity and local employment.

Strategies

- *Ensure land use and development proceeds generally in accordance with the relevant Structure Plan maps.*
- *Provide for a range of retail, commercial, community uses in town centres to provide services for the community and local employment opportunities in accordance with Structure Plans.*
- *Direct the bulk of residential growth and retail development to the designated growth locations of Drysdale/Clifton Springs, Leopold and Ocean Grove consistent with the relevant Structure Plan maps.*
- *Direct bulky goods retailing and industrial development to existing and future areas identified in Structure Plans.*

6. Objective

To support and encourage diverse and sustainable tourism as a key economic activity in townships and in rural areas where it complements and respects the farmed rural landscape of the area, does not impact upon existing farming activities and contributes to the local economy.

Strategies

- *Support a range of appropriately scaled and located tourism accommodation and activities within township boundaries.*
- *Preserve and enhance key tourism assets, in particular the built and natural environments and sporting and tourist areas.*
- *Support the development of rural land for tourism where the development will not compromise the farmed rural landscape.*
- *Ensure that tourism uses in rural areas will not compromise agricultural activities on adjoining land.*

Current Significant Landscape Overlays on the Bellarine Peninsula

GREATER GEELONG PLANNING SCHEME

Section 42.03 SIGNIFICANT LANDSCAPE OVERLAYS – there are fifteen Significant Landscape Overlays within the City of Greater Geelong. Ten of the fifteen are on the Bellarine Peninsula.

28/01/2010 C129(Part 1)

SCHEDULE 6 TO CLAUSE 42.03 SIGNIFICANT LANDSCAPE OVERLAY

Shown on the planning scheme map as SLO6. WALLINGTON ROAD, OCEAN GROVE

07/06/2018 C349

SCHEDULE 7 TO CLAUSE 42.03 SIGNIFICANT LANDSCAPE OVERLAY

Shown on the planning scheme map as SLO7. OCEAN GROVE HILLSIDE AREA

13/11/2014 C300

SCHEDULE 8 TO CLAUSE 42.03 SIGNIFICANT LANDSCAPE OVERLAY

Shown on the planning scheme map as SLO8

BARWON HEADS SEMI-BUSH SIGNIFICANT LANDSCAPE AREA

13/11/2014 C300

SCHEDULE 9 TO THE SIGNIFICANT LANDSCAPE OVERLAY

Shown on the planning scheme map as SLO9. BARWON RIVER ENVIRONS BARWON HEADS

24/02/2011 C177

SCHEDULE 10 TO CLAUSE 42.03 SIGNIFICANT LANDSCAPE OVERLAY

Shown on the planning scheme map as SLO10. LAKE CONNEWARRE ESCARPMENT

24/02/2011 C177

SCHEDULE 11 TO CLAUSE 42.03 SIGNIFICANT LANDSCAPE OVERLAY

Shown on the planning scheme map as SLO11. LAKE VICTORIA AND YARRAM CREEK

24/02/2011 C177

SCHEDULE 12 TO CLAUSE 42.03 SIGNIFICANT LANDSCAPE OVERLAY

Shown on the planning scheme map as SLO12. SWAN BAY AND SURROUNDS

24/02/2011 C177

SCHEDULE 13 TO CLAUSE 42.03 SIGNIFICANT LANDSCAPE OVERLAY

Shown on the planning scheme map as SLO13 MURRADOC HILL

24/02/2011 C177

SCHEDULE 14 TO CLAUSE 42.03 SIGNIFICANT LANDSCAPE OVERLAY

Shown on the planning scheme map as SLO14. CLIFTON SPRINGS TO PORTARLINGTON COAST

07/06/2018 C349

SCHEDULE 15 TO CLAUSE 42.03 SIGNIFICANT LANDSCAPE OVERLAY

Shown on the planning scheme map as SLO15.

OCEAN GROVE SIGNIFICANT TREE RESIDENTIAL AREA

QUEENSCLIFFE PLANNING SCHEME

11/05/2017 C27

SCHEDULE 1 TO THE SIGNIFICANT LANDSCAPE OVERLAY

Shown on the planning scheme map as SLO1. SWAN BAY LANDSCAPE AREA

1.0 Statement of nature and key elements of landscape 11/05/2017

C27

The Swan Bay Landscape Area is a shallow tidal bay that gives a diverse range of unique open vistas, while providing a scenic backdrop to the entrance of the Borough and to the town of Queenscliff.

11/05/2017 C27

SCHEDULE 2 TO THE SIGNIFICANT LANDSCAPE OVERLAY

Shown on the planning scheme map as SLO2.

POINT LONSDALE LOOKOUT & QUEENSCLIFF LIGHTHOUSE / OCEAN VIEW CAR PARK

1.0 Statement of nature and key elements of landscape 11/05/2017

C27

The Point Lonsdale Lookout and the Queenscliff Lighthouse/ Ocean View car park are elevated and contain/ or provide panoramic views to the Borough's most attractive and striking physical features.

11/05/2017 C27

SCHEDULE 3 TO THE SIGNIFICANT LANDSCAPE OVERLAY

Shown on the planning scheme map as SLO3. THE NARROWS

1.0 Statement of nature and key elements of landscape 11/05/2017

C27

*The Narrows is an avenue of cypress trees that provides a bold entrance to the Borough.
The Bellarine highway is anked to the south by the steep primary dune, which contrasts with the scenic views and landscapes visible to the north of Swan Bay and its islands.
The key element of the landscape is the avenue of cypress trees and the vistas of Swan Bay.*