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29 May 2026

Emma Griffiths
Statutory Planner
City of Greater Geelong
137-149 Mercer Street
GEELONG VIC 3220

Response to Request for Further Information – PP-185-2026
1A Golf Links Road, Barwon Heads, 3227

Dear Emma,

We write in response to your request for further information regarding permit application PP-185-2026, dated 1 April 2026, which seeks approval for building and works and removal of native vegetation to establish a maintenance hole at The Barwon Heads Golf Club at 1A Golf Links Road, Barwon Heads.

The response has been prepared with consideration of critical issues that were raised by both DEECA and the environment team at the City of Greater Geelong related to the removal of native vegetation.

The maintenance hole layout has been amended to allow for the retention and protection of the threatened species Coast Wairilda (*Acacia uncifolia*).

The application material, in response to the further information request, has been updated to include additional detail and assessment on the need for the maintenance hole in the context of the established golf course use and how the location and design satisfies the 'avoid' considerations of the Guidelines for the removal, destruction or lopping of native vegetation (Department of Energy, Environment and Climate Action, 2025).

Part of the 'avoid' considerations include the chosen location for the hole as part of the established golf course. The Barwon Heads Golf Course is an important tourism attraction within the Bellarine Peninsula and Greater Geelong offering a high-quality golfing experience for locals and visitors, including international guests.

The alternatives of operating with fewer than 18 holes, requiring players to repeat a hole, or delaying necessary works are not an effective outcome for maintaining the golfing experience and/or present operational and safety.

A Risk Mitigation Matrix and Environmental Risk Assessment, prepared by epar Pty Ltd, has been prepared, detailing the risks and consequence of different responses.

The siting has been chosen as the most practical option to support the safe and effective operation of the course as an 18-hole facility.

The hole design remains compact and the partial removal of vegetation allows for the hole to be integrated into the landscape.

This response consists of two parts (including content which overlaps):

- A Section 50 amendment to the application related to the change to the proposal.
- The information sought by Council and DEECA as a response to the RFI.

These will be discussed separately below.

Section 50 Application

The proposal has been revised in the response to the issues raised regarding the removal of native vegetation, in particular the proposed removal of three identified examples of Coast Wirilda.

The maintenance hole layout has been adjusted to include the following changes:

- Tee locations reduced in size to position outside of the tree protection zones (measured at 2-metre radius) of the Coast Wirilda located to the north and south.
- The retaining wall proposed to the north of the tee areas has been removed from the proposal and the area proposed to be battered (slope of 1:2.5 max.) and finished with vegetation.
- The batter will be clear of the retained protected species.
- The extent of vegetation removal has been shown on an updated Ecological Features map prepared by Okologie Consulting. The Native Vegetation Removal Report has also been revised based on the changed design.

To assist the Council in its consideration of the application please find attached the following material:

- A completed Section 50 amend a planning application form.
- Updated plans by Crafter + Mogford showing the layout of the hole and the extent of the works.
- Updated Ecological Features plan prepared by Okologie Consulting, showing the extent of removal.
- Update Native Vegetation Removal Report, dated 1 May 2026.
- Risk Mitigation Matrix and Environmental Risk Assessment by epar Pty Ltd.
- Response from The Barwon Heads Golf Club [REDACTED] on the operational need, safety benefits and environmental management.
- Updated planning report by Ratio Consultants including detail of the revised design and additional discussion on how the maintenance hole proposal has sought to avoid and minimise the removal of native vegetation.

RFI Response

The requested matters as sought by Council and DEECA include detail within the following documents:

- Cultural Heritage Management Plan approved by the Wadawurrung Traditional Owners Aboriginal Corporation.
- Land Management Strategy, prepared by Okologie Consulting, was previously submitted with the application but is understood to have not been provided to DEECA as part of the referral.
- Risk Mitigation Matrix and Environmental Risk Assessment by epar Pty Ltd.
- Response from The Barwon Heads Golf Club [REDACTED] on the operational need, safety benefits and environmental management.

- Memo from The Barwon Heads Golf Club on Irrigation and Fertiliser Application Practices, dated May 2026.
- Updated planning report by Ratio Consultants including detail of the revised design and additional discussion on how the maintenance hole proposal has sought to avoid and minimise the removal of native vegetation.

The RFI response package, including the revised maintenance hole, was discussed with [REDACTED] at a meeting with Ratio Consultants and representatives of The Barwon Heads Golf Club on 15 May 2026.

The requested information sought by the City of Greater Geelong and DEECA is addressed in the points below:

1. The complete Cultural Heritage Management Plan (CHMP) as prepared by Biosis is attached. Page 2 of the document is the notice of approval from the Wadawurrung Traditional Owners Aboriginal Corporation, dated 12 February 2026.
2. Discussion regarding matters raised by DEECA in its referral response CMS00013096 dated 30 March 2026, are discussed below, noting that some matters has been addressed in the revised design.

Application Requirement 1 – Information about the native vegetation to be removed

- The hole design has been revised to remove the retaining wall in the north-east corner of the project area. This has occurred along with the reduction in the size of the tee areas to allow for the retention of the identified Coast Wirilda in the location. The area will be battered instead and the vegetation in the location shown as being subject to full removal.
- The partial removal locations will not be affected by the fertilising and watering of the adjoining fairways and greens as the distribution system are technically designed to target specific locations so to be more efficient in delivery.
- The provided memo from The Barwon Heads Golf Club regarding Irrigation and Fertiliser Application Practices, dated May 2026 details how these activities are precisely managed and monitored.

The partial removal areas are not intended to be accessed by players.

It is noted that the current playing areas of the course currently has interface with patches of Coastal Alkaline Shrub, which Okologie Consulting has observed is generally of a high quality and condition, which does not indicate an effect of adjoining watering and fertilising.

- Regarding DEECA's concern regarding the location of the maintenance hole close to two existing offset sites, The Barwon Heads Golf Club had previously prepared a Land Management Strategy, by Okologie Consulting, which details how native vegetation on the course land will be maintained and enhanced through coordinated actions.

It is understood through discussion with [REDACTED] that this was not provided to DEECA for review. It is considered that the plan provides a holistic approach to the management of native vegetation beyond the requirements of the permit approvals and demonstrate how the maintenance hole will be positioned within these efforts.

- The removal location will be developed and used as a golf hole which will maintained through the efficient use of water and fertiliser which will manage erosion and land degradation.

More broadly, The Barwon Head Golf Club has prepared a Land Management Strategy (provided with this RFI response), which is focused on the restoration of native vegetation communities, control of invasive Coast Tea Tree and the protection of non-playing areas.

In this context the proposed removal is part of meeting an operational requirement as part of broader land management objectives where the club is actively seeking to achieve long-term biodiversity objectives.

Application Requirement 5 – Avoid and minimise statement

- A Risk Mitigation Matrix and Environmental Risk Assessment, as prepared by epar Pty Ltd, which details the implications of not providing a maintenance hole, including effects on the course function and the potential work health safety issues for course workers.
- The planning report by Ratio Consultants includes further details on the design process for the maintenance hole. This is supported by the Risk Mitigation Matrix and Environmental Risk Assessment and the response from The Barwon Heads Golf Club (authored by Anthony Masters, General manager) on the operational need, safety benefits and environmental management.

Should you have any queries relating to the submission please contact me on [REDACTED]

Yours sincerely,



Associate