

Client
The Barwon Heads Golf Club

Date
28 May 2026

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Proposed Maintenance Hole The Barwon Heads Golf Club



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Acknowledgement of Country

We acknowledge the Traditional Owners of the land we work, live and travel on, and appreciate the rich cultures of the Aboriginal and Torres Strait Islander Peoples and their enduring connection to country.

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1. Introduction

Ratio Consultants has prepared this permit application on behalf of The Barwon Heads Golf Club. The application seeks approval for the construction of a maintenance hole and associated removal of native vegetation.

The maintenance hole will provide operational flexibility for the golf course. It will be used to allow for essential repair or upgrade of other holes of the course by taking them out of play. This allows for the maintenance to be undertaken safely while preserving the playing experience for members and guests.

This planning report details the proposal, the relevant planning controls and provides an assessment on why the building and works and removal of native vegetation to achieve the hole layout is an acceptable planning outcome.

The planning report is informed by the following application documents:

- Layout Plan by crafter + mogford golfing strategies.
- Vegetation Assessment by Okologie Consulting.
- Cultural Heritage Management Plan by Biosis.

The application has been informed and refined by feedback on a previous application in 2019. The changes included in the current proposal are a reduced footprint for the hole, a complete accounting of which parts of the vegetation are considered removed, and the confirmation of available off-site offsets.

The response also includes the preparation of a Land Management Strategy (Okologie Consulting) for the golf course. The strategy provides a collated overview of how the vegetation on the wider property of The Barwon Heads Golf Club will be managed into the future. This includes the maintenance of existing on-site offsets and activities to thin Coast Tea Tree so to improve the ecological conditions for Coastal Alkaline Scrub.

The Land Management Strategy is provided to inform the City of Greater Geelong of the broader context to the permit application and how the proposed removal of native vegetation aligns with the overall strategy.

2. Subject Land and Surrounds

2.1. Subject Land

The Barwon Heads Golf Club (“the Club”) is located to the south of the Barwon Heads township at 1A Golf Links Road, Barwon Heads, 3227.

The Club comprises of 16 related parcels. The specific parcel affected by this permit application is Lot 8 TP829909.

The proposed hole location is located to the south of the golf course layout. It is positioned to the south of the 10th hole (see Figure 2-3 below), which will allow for the hole to be entered into play between the 10th green and the tee for the 11th hole.

The hole location is currently occupied by a mix of native and introduced vegetation. A cleared section of land features in the north of the hole location alongside the 10th hole fairway.

The submitted vegetation assessment by Okologie Consulting (dated 22/1/2026) found the maintenance hole location was characterised by a modified cover of Coastal Alkaline Shrub, which included listed Threatened Coastal Moonah (*Melaleuca lanceolata*) Woodland Community and one listed threatened flora species (Coast Wirilda *Acacia uncifolia*) in three locations. No listed threatened fauna species or associated habitat were found.

The land parcel has an area of approximately 33.33 hectares. The land includes the course layout through its centre, north and west. Coastal vegetation features in the south of the parcel, extending into the middle of the lot alongside the areas cleared for the course.

Other features of the parcel include a single storey building in the north of the lot and a water storage dam, tank and adjoining building in the eastern extent.

Two Section 173 agreements exist on the titles for the land: AK715208F and AN219436G. Both agreements relate to on-site offsets which exist on the subject land in two parts.

Agreement AK715208F relates to on-site native vegetation offsets related to planning permit No. 824/2012 issued on 6 September 2013 allowing works associated with the existing golf course and removal of native vegetation. The works were associated with holes 11, 15 and 16. The endorsed Net Gain Offset Management Plan requires the fencing and protection

of a defined offset area in perpetuity as well as undertake a 10-year active management program of the offset area.

Agreement AN219436G relates to on-site native vegetation offsets related to planning permit No. 1305/2015 issued on 2 March 2016 allowing for removal of native vegetation on the fairways of holes 12 and 14. The agreement requires offsets be secured in accordance with *Offset Site 3A Remnant Patch Offset Management Plan – Barwon Heads Golf Club (22 September 2015)* and *Offset Site 3b Remnant Patch Offset Plan – Barwon Heads Golf Club (22 September 2015)*.

The new maintenance hole location is in an Area of Aboriginal Cultural Sensitivity. A Cultural Heritage Management Plan (CHMP) has been prepared for the proposed building and works under the *Aboriginal Heritage Regulations 2018*.

Figure 2-1: Title plan of Lot 8 on TP829909

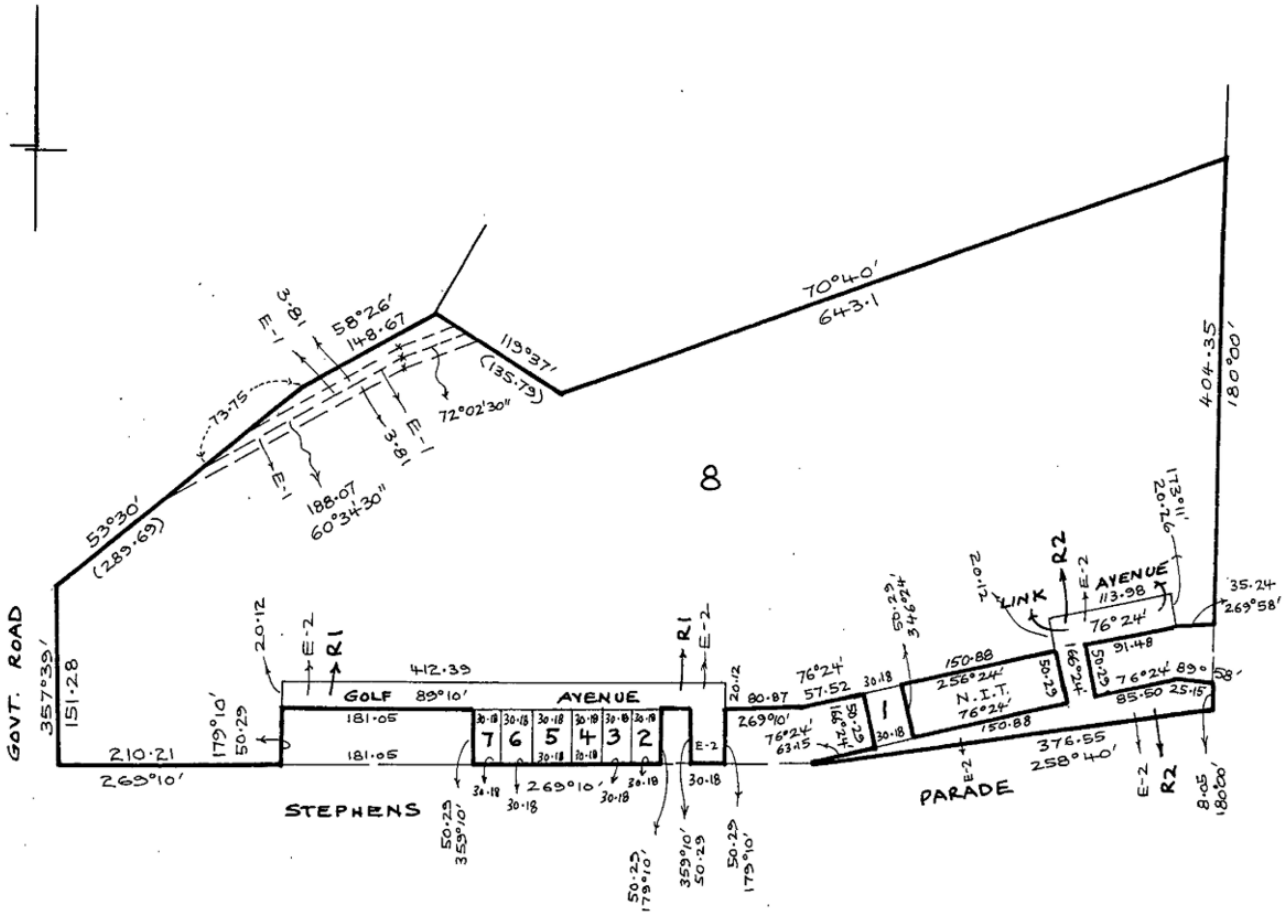


Figure 2-2: Aerial photo of proposed hole location



Source: Landchecker <https://app.landchecker.com.au/property/VIC-213763358/info?addressId=VIC-213763360>, image dated 11 August 2025

Figure 2-3: The proposed hole location in context of existing course layout



- | | | | | |
|----|---|----|----|---|
| A. | CLUBHOUSE, ACCOMMODATION, DINING, CONFERENCES | (1 | G. | DRIVING RANGE (MEMBERS/HOUSE GUESTS ONLY) |
| B. | PRO SHOP AND 1 ST TEE AREA | | H. | PAR -COURSE ST HOLE) |
| C. | HOUSE GUEST UNDERCOVER CAR PARK | | I. | WALKING PATH TO BEACH |
| D. | TENNIS COURTS AND LOWER CAR PARK | | J. | WALKING PATH TO THE HEADS |
| E. | SHORT -GAME PRACTICE AREA | | K. | BARWON HEADS VILLAGE |
| F. | COACHING HUT (ENQUIRIES TO PRO SHOP) | | L. | THIRTEENTH BEACH (SURFING/SWIMMING BEACH) |

Source: The Barwon Heads Golf Club

Figure 2-4: The proposed hole location in context of adjoining offset sites and present ecology communities



Source: Land Management Strategy, Okologie Consulting, p. 36

2.2. Surrounding Properties

The golf land use is a prominent feature in the location due to the presence of The Barwon Heads Golf Club and the Thirteenth Beach Golf Club to the west. The surrounds include residential interfaces to the south as well as environmental features such as the coastal environs and wetlands.

The immediate interfaces include:

To the south: The southern boundary of the subject land forms the rear boundary of 11 residential properties that front Stephens Parade, an unsealed road.

Adjoining properties to the east and west, also fronting Stephens Parade, are separated from having a direct interface through the presence of 'paper' road reserves – Link Avenue to the east and Golf Avenue to the west – which extend from Stephens Parade and runs along the rear of these properties. The road reserves are not formed for vehicle access.

The residential properties are within the Low Density Residential Zone (LDRZ).

Further to the south is Thirteenth Beach. The intervening space is occupied by the Barwon Heads Park and Thirteenth Beach Road. The area is extensively covered by coastal vegetation that obstructs views to the north and south from Stephens Parade. The land is within the Public Conservation and Resource Zone (PCRZ).

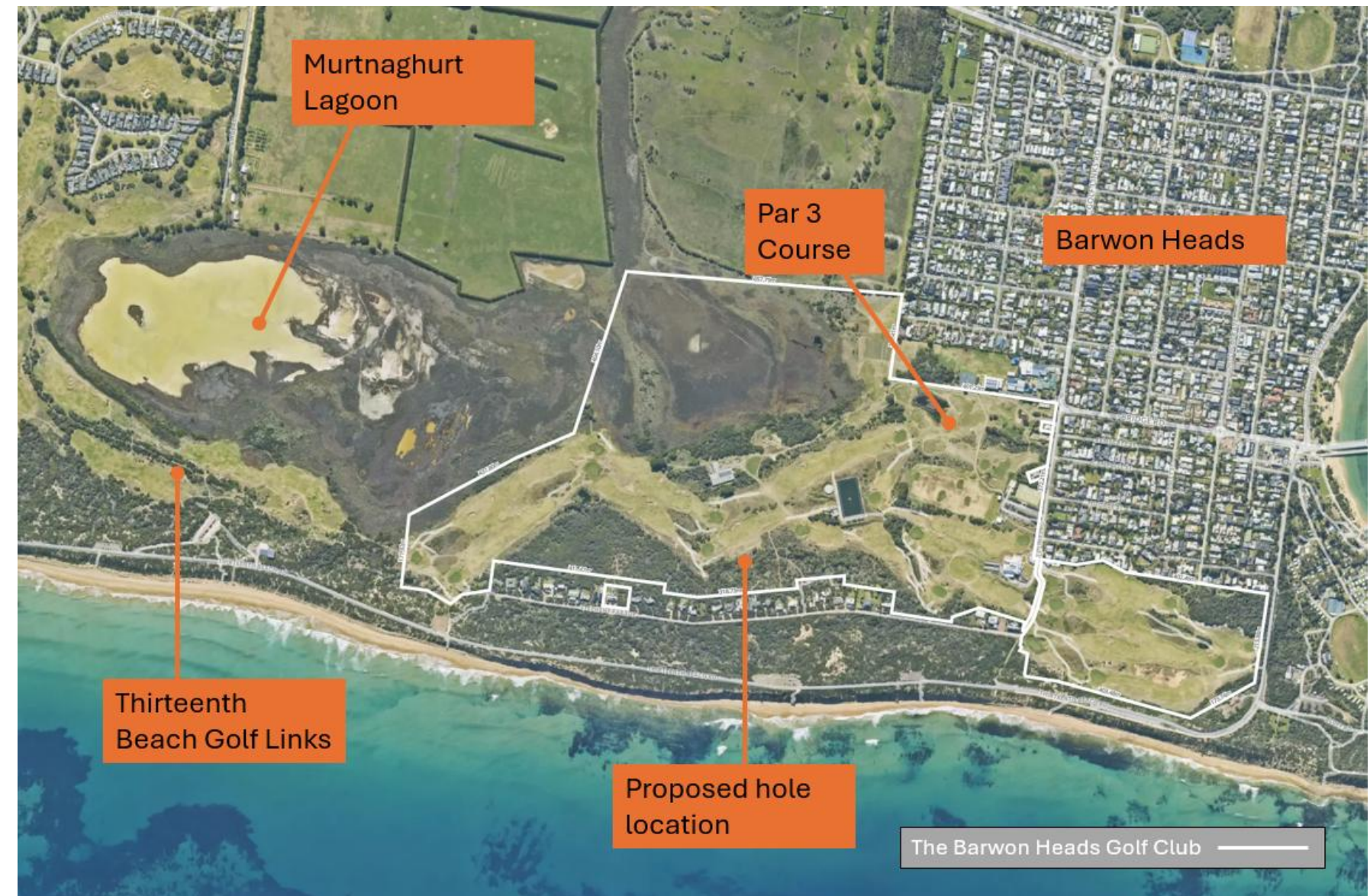
To the west: The western boundary of the subject land is partially shared with the Thirteenth Beach Golf Course, where the course layout occupies land to the south of the Murtnaghurt Lagoon. The subject land also shares the boundary with the lagoon to its northwestern corner, which is within the Public Conservation and Resource Zone (PCZ).

To the north: The northern boundary of the subject land is shared with Lot 1 of TP237574, which also forms part of The Barwon Heads Golf Club land along with the adjoining parcel to its north. The parcels are occupied by the Murtnaghurt Lagoon with the Rural Conservation Zone, Schedule 10 (RCZ10) applying to the land.

To the east: Parcel Lot 1 on TP838846 also forms part of The Barwon Heads Golf Club, including the course layout, club

house, car parking, tennis courts, a residential building, and outbuildings.

Figure 2-5: Surrounding development and land use



Source: Landchecker <https://app.landchecker.com.au/property/VIC-213763358/info?addressId=VIC-213763360>, image dated 11 August 2025, Ratio Consultants

Figure 2-6: The interface of the proposed hole location and residential properties to the south fronting Stephens Parade



Source: Landchecker <https://app.landchecker.com.au/property/VIC-213763358/info?addressId=VIC-213763360>, image dated 11 August 2025, Ratio Consultants

3. The Proposal

MAINTENANCE HOLE LOCATION AND LAYOUT

The proposal seeks to establish a maintenance hole to the golf course layout, which will be used when one of the other holes is removed from play to allow for repair and conditioning. It does not change the scale of the golf course use as only 18 holes will remain in play at any one time. The maintenance hole will allow for works to be completed safely while preserving the quality of play for the club members.

It is proposed to locate the maintenance hole adjacent to the south of the existing links layout. The hole position works most effectively to allow a flow of play with the existing course layout.

The hole layout will have a footprint of 7,200 square metres which will include two raised tees, a fairway, and a green. No bunkers are proposed and the contouring of the hole will be achieved from sand within the course on top of the existing surface level. As such, no additional excavation will be required to achieve the raised area.

A retaining wall constructed of vertical sleepers will be constructed to the north tee locations. The rear tee will be raised approximately 1 metre above ground level where the forward tee height above ground level will be between 1 to 1.5 metres.

The hole will be Par 3 and have three tee lengths on the two tees: 125, 114 and 108 metres.

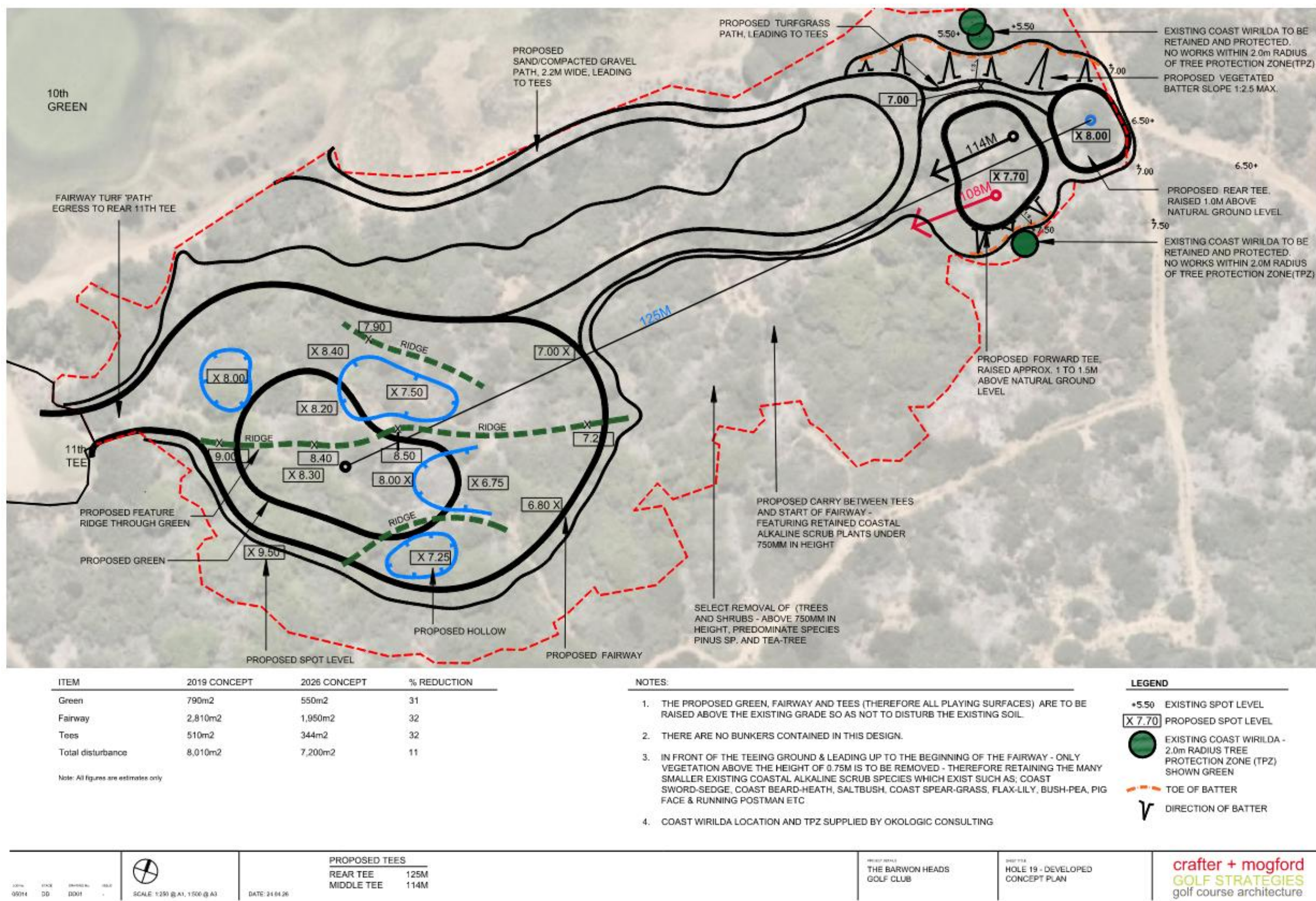
The fairway will be shaped to retain native vegetation below the proposed carry (the space between the forward tee and the start of the fairway alongside the green) where native vegetation will be retained. A sand/compacted gravel path (2.2 metres wide) will enable player movement between the tees and the fairway. It will also extend along the northern extent of the hole location, where the vegetation has been mostly removed, to provide access from the 10th hole green. The fairway extends to the west to provide a path to the 11th hole tee.

Figure 3-1: Proposed hole location



Source:

Figure 3-2: Proposed hole layout



VEGETATION REMOVAL

A total of 0.933 hectares of Coastal Alkaline Shrub (EVC 858) is proposed for removal. Specifically,

- 0.58 hectares is proposed for full removal
- 0.353 hectares is proposed for partial removal.

The partial removal is proposed to be to the north and south of the path that connects the tees to the fairway/green. The removal will include the pruning of shrubs to 750 millimetres and retention of the understorey. The pruning will allow for play to occur above the area but will not be directly assessed by golfers.

The tee locations have been minimised in size to allow for the retention and protection of examples of Coast Wirlida, which are positioned to the north and south of the tees.

A general offset amount of 0.428 general habitat units is required. The general offset must have a minimum strategic biodiversity value score of 0.622 and be within the Corangamite Catchment Management Authority or Greater Geelong City Council.

It is proposed that an off-site offset be secured. The submitted vegetation assessment by Okologie Consulting has confirmed that a suitable positioned offset of the amount required is available.

Figure 3-3: Proposed native vegetation removal



Source: Okologie Consulting

Figure 3-4: The proposed vegetation removal of the 2019 application

CHANGES SINCE 2018 APPLICATION

In 2018, a permit application was lodged with the City of Greater Geelong Council for a maintenance hole in this location. The permit application was subsequently refused and since this time, the Club has prepared an updated hole design. The new design adopts a more compact footprint and is supported by additional technical documentation.

The 2018 proposal had an approximate footprint of 8,010 square metres, which is 11% larger than the current proposal of 7,200 square metres. The change to the size of elements of the hole include:

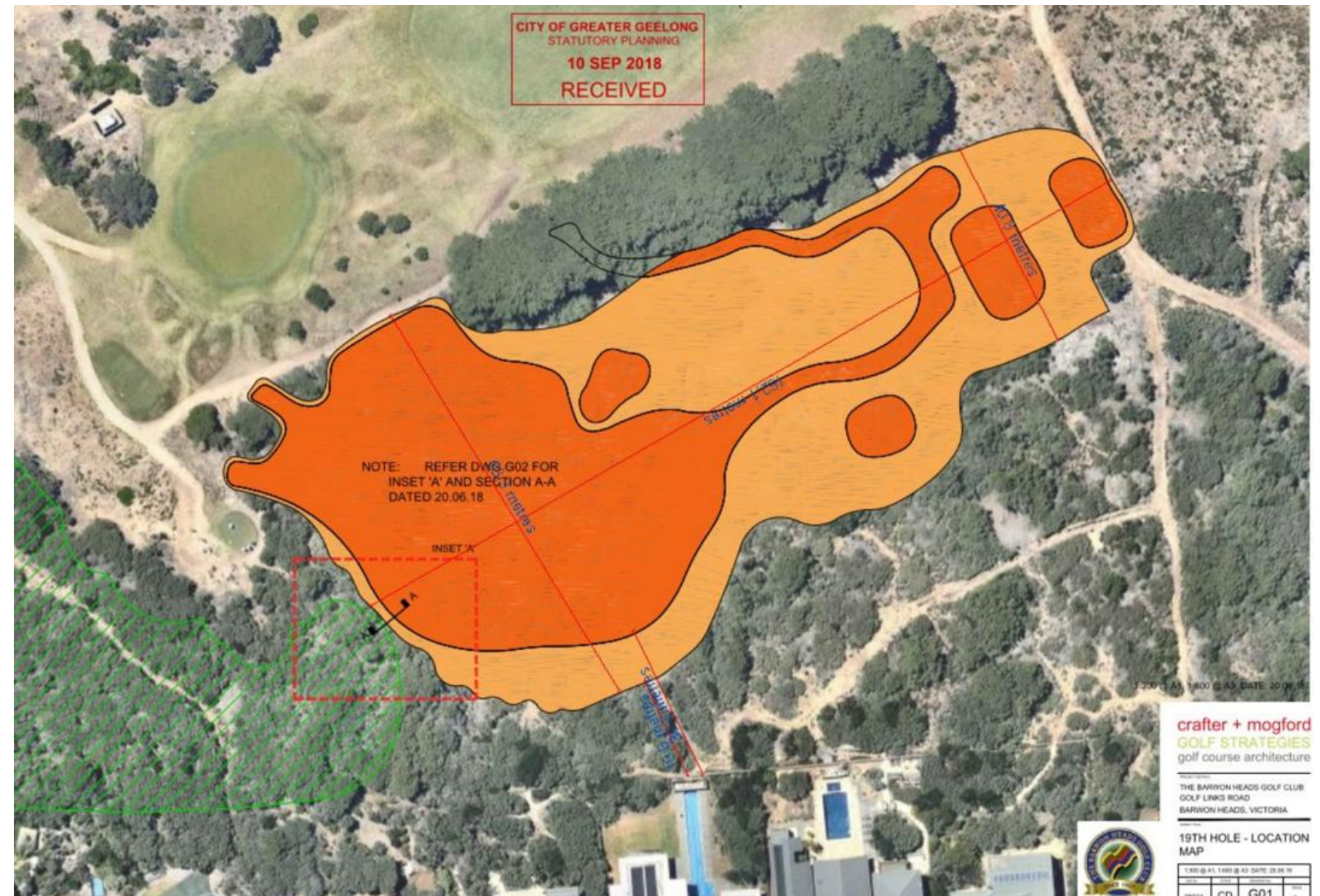
- Green is now 550 square metres, previously 790 square metres, a reduction of 31 per cent.
- Fairway is now 1950 square metres, previously 2,810 square metres, a reduction of 32 per cent.
- Tees are now 455 square metres, previously 510 square metres, a reduction of 10 per cent.

The previous layout required the removal of 0.87 hectares of native vegetation, consisting of a complete removal of 0.465 hectares and partial removal of 0.401 hectares. As shown on Figure 3-4, dark orange is where full removal was proposed; light orange indicates partial removal.

While the removal figures were lower than the current proposal, Council's opinion was that parts of the retained vegetation were within a location to be used by golfers (such as between the tees and pathways) and that the use would incrementally degrade the vegetation and that it should be considered lost.

The current proposal adopts this conservative approach, resulting in a higher amount of native vegetation removal, including more full removal, for the more compact footprint.

A Land Management Strategy has been prepared to guide the long-term conservation of native vegetation through best practice management. The activities include weed management, such as works to reduce the Coast Tea-tree canopy. That work is exempt under Clause 52.17, which has been confirmed in writing by DEECA.



Source: Planning Officer Report, Permit Application PP510/2018, dated 1 May 2020, p. 12.

4. Planning Controls

4.1. Zoning

CLAUSE 37.01 - SPECIAL USE ZONE, SCHEDULE 3 (SUZ3)

SUZ3 is applied to Private Golf Courses under the Greater Geelong Planning Scheme.

The purpose of the zone is:

- To provide for the use and development of private golf courses.
- To ensure that the use and development of land for the purpose of private golf courses does not prejudice the amenity of surrounding areas.

The table of uses in Clause 1.0 of the SUZ3 establishes that golf course is a Section 1 (permit not required) use.

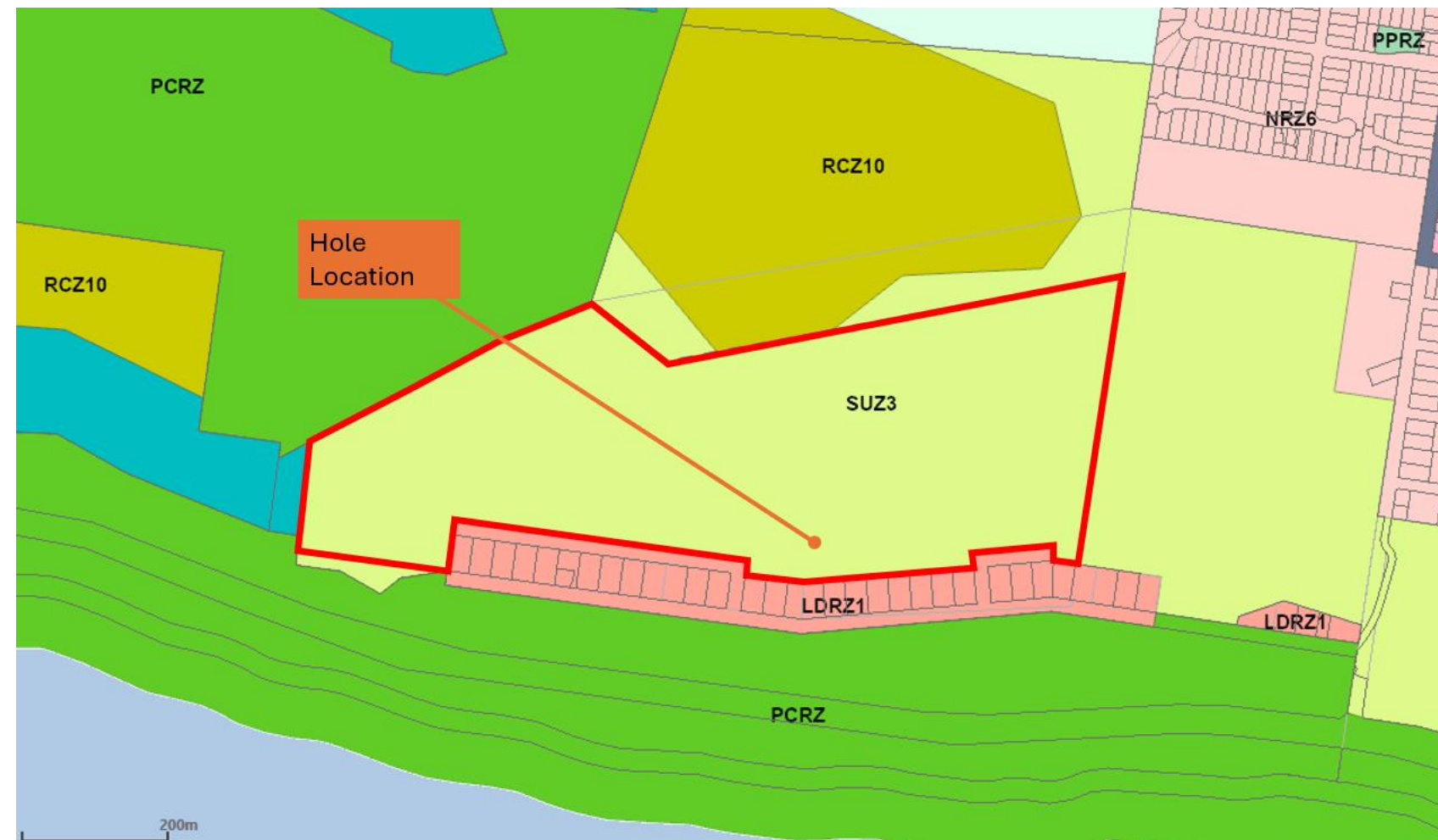
A permit for building and works is required under Clause 37.01-4.

Clause 4.0 of the schedule establishes application requirements and decision guidelines. The decision guidelines, which must be considered by the responsible authority in determining an application in the zone, include:

- The purpose of the zone.
- The provision of car parking.
- Any expected increase in traffic.
- The height, siting and form of proposed buildings (including the set back of buildings from lot and street boundaries).
- The adequacy and efficiency of access/egress points to the site.
- The impact of stormwater run-off.
- The impact of development on native vegetation both on the site and on neighbouring properties.
- The interface of the site with adjoining zones.
- The treatment and disposal of all wastewater and drainage water, in particular the way in which wastewater will be collected, treated and re-used on site or discharged to a reticulated system.
- The provision of land for landscaping.

– The storage of rubbish and materials for recycling.'

Figure 4-1: Zoning Map



Source: VicPlan <https://mapshare.vic.gov.au/vicplan/>

4.2. Overlays

CLAUSE 43.01 - HERITAGE OVERLAY, SCHEDULE 1650 (HO1650)

HO1650 applies to the Golf Links Heritage Area, which is bounded generally by Stephens Parade, Ewing Blyth Drive, Golf Links Road, and includes Barwon Heads Golf Club, Barwon Heads.

Clause 2.1 of the overlay schedule references Incorporated Documents of the Golf Links Heritage Area Statement of Significance and Golf Links Heritage Area Heritage Design Guidelines.

The purpose of the HO is:

- To implement the Municipal Planning Strategy and the Planning Policy Framework.
- To conserve and enhance heritage places of natural or cultural significance.
- To conserve and enhance those elements which contribute to the significance of heritage places.
- To ensure that development does not adversely affect the significance of heritage places.
- To conserve specified heritage places by allowing a use that would otherwise be prohibited if this will demonstrably assist with the conservation of the significance of the heritage place.

Clause 43.01-1 requires a permit for building and works.

Relevant decision guidelines of Clause 43.01-8 include (among others):

- The significance of the heritage place and whether the proposal will adversely affect the natural or cultural significance of the place.
- Any applicable statement of significance (whether or not specified in the schedule to this overlay), heritage study and any applicable conservation policy.
- Any applicable heritage design guideline specified in the schedule to this overlay.
- Whether the location, bulk, form or appearance of the proposed building will adversely affect the significance of the heritage place.

– Whether the proposed works will adversely affect the significance, character or appearance of the heritage place.

Figure 4-2: Heritage Overlay Map



Source: VicPlan <https://mapshare.vic.gov.au/vicplan/>

CLAUSE 44.06 - BUSHFIRE MANAGEMENT OVERLAY (BMO)

The BMO applies to most of the subject land apart from a section in the northwestern corner.

The purpose of the BMO is:

- To implement the Municipal Planning Strategy and the Planning Policy Framework.
- To ensure that the development of land prioritises the protection of human life and strengthens community resilience to bushfire.
- To identify areas where the bushfire hazard warrants bushfire protection measures to be implemented.
- To ensure development is only permitted where the risk to life and property from bushfire can be reduced to an acceptable level.

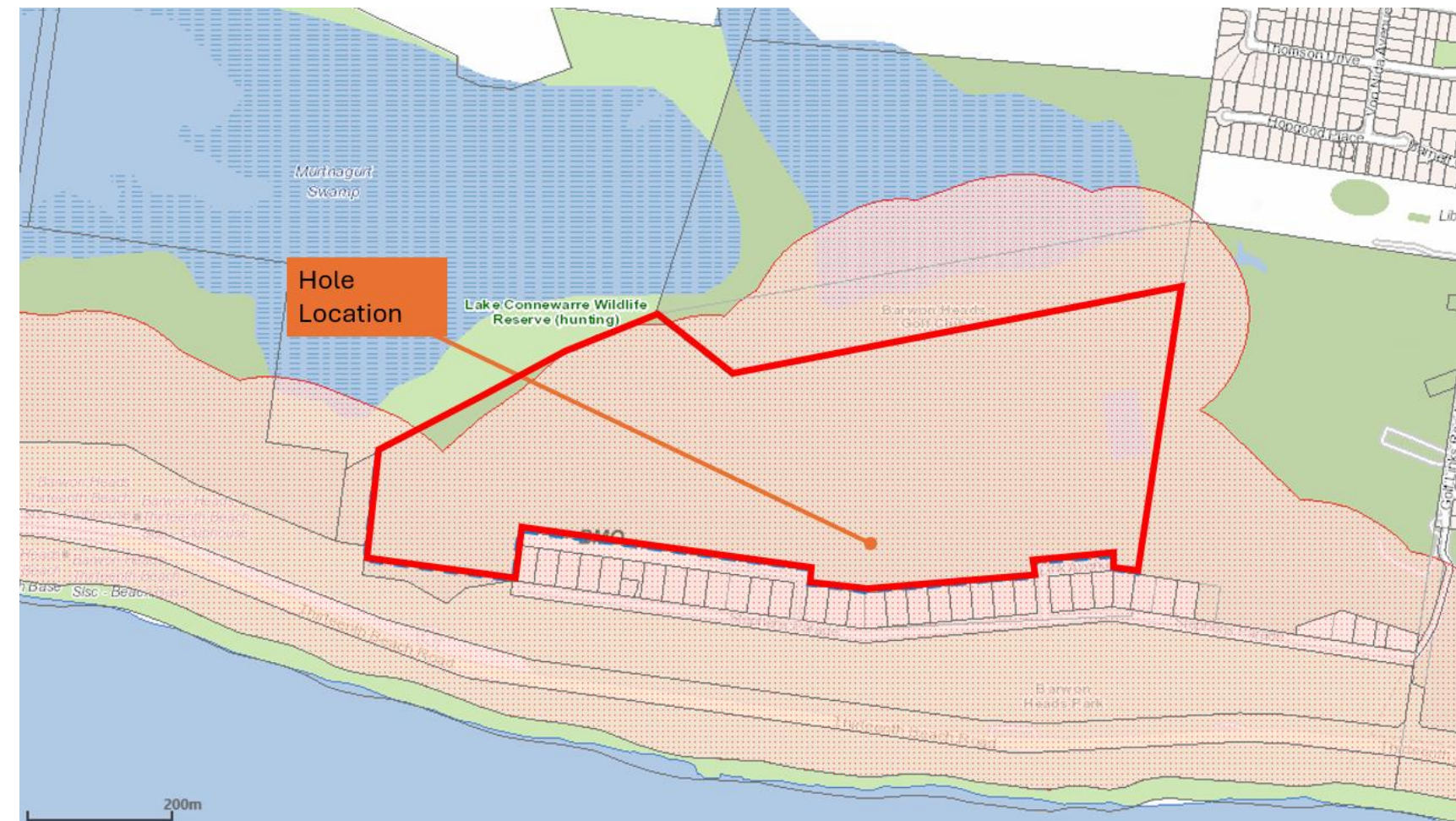
Clause 44.06-2 requires a permit for building and works associated with the Leisure and recreation (among others), under which the Golf course use is nested.

Clause 44.06-3 includes requirements that must accompany an application. The responsible authority may waive, vary or reduce a requirement if it is of the opinion that it is not relevant to the assessment of the application.

It is submitted that in this case the building and works do not warrant a bushfire hazard site assessment, a bushfire hazard landscape assessment, or bushfire management statement as it is not introducing a use where the risk is increased through additional population density in a fixed location, such as within a building. The golf course use will continue to operate with the same number of people, using the new hole where required for the maintenance purposes.

Clause 66.03 requires an application under the overlay, other than for building and works associated with a dwelling or an application to subdivide land, to be referred to the relevant fire authority as a Recommending referral authority.

Figure 4-3: Bushfire Management Overlay Map



Source: VicPlan <https://mapshare.vic.gov.au/vicplan/>

4.3. Particular Provisions

CLAUSE 52.06 – CAR PARKING

The purpose of the clause is:

- *To ensure that car parking is provided in accordance with the Municipal Planning Strategy and the Planning Policy Framework.*
- *To ensure the provision of an appropriate number of car parking spaces having regard to the demand likely to be generated, the activities on the land and the nature of the locality.*
- *To support sustainable transport alternatives to the motor car.*
- *To promote the efficient use of car parking spaces through the consolidation of car parking facilities.*
- *To ensure that car parking does not adversely affect the amenity of the locality.*
- *To ensure that the design and location of car parking is of a high standard, creates a safe environment for users and enables easy and efficient use.*

The subject land is within a Category 1 location where the applied rate for golf course is a minimum requirement of 4 spaces to each hole.

While the car parking rate for golf course within the table in Clause 52.06-5 is calculated on a per hole basis, it is submitted that the proposal does not practically change the scale of the use as only 18 holes will be active at one time.

CLAUSE 52.17 – NATIVE VEGETATION

The purpose of the clause is:

- *To ensure that there is no net loss to biodiversity as a result of the removal, destruction or lopping of native vegetation. This is achieved by applying the following three step approach in accordance with the Guidelines for the removal, destruction or lopping of native vegetation (Department of Energy, Environment and Climate Action, 2025) (the Guidelines):*
 - 1. Avoid the removal, destruction or lopping of native vegetation.*
 - 2. Minimise impacts from the removal, destruction or lopping of native vegetation that cannot be avoided.*

3. Provide an offset to compensate for the biodiversity impact if a permit is granted to remove, destroy or lop native vegetation.

- *To manage the removal, destruction or lopping of native vegetation to minimise land and water degradation.*

Clause 52.17 requires a permit to remove, destroy or lop native vegetation, including dead native vegetation. Exemptions cited in the clause do not apply to this application.

Clause 52.17-5 establishes that a permit to remove, destroy or lop native vegetation must offset the biodiversity impacts in accordance. The conditions of the permit for the removal, destruction or lopping of native vegetation must specify the offset requirement and timing to secure the offset.

An application to remove, destroy or lop native vegetation in the Detailed Assessment Pathway is required to be referred to DEECA as a Recommending referral authority under Clause 66.02-2.

CLAUSE 53.02 – BUSHFIRE PLANNING

The purpose of the clause is:

- *To implement the Municipal Planning Strategy and the Planning Policy Framework.*
- *To ensure that the development of land prioritises the protection of human life and strengthens community resilience to bushfire.*
- *To ensure that the location, design and construction of development appropriately responds to the bushfire hazard.*
- *To ensure development is only permitted where the risk to life, property and community infrastructure from bushfire can be reduced to an acceptable level.*
- *To specify location, design and construction measures for a single dwelling that reduces the bushfire risk to life and property to an acceptable level.*

Clause 53.02 applies to an application under Clause 44.06 Bushfire Management Overlay, unless the application meetings all of the requirements specified in a schedule to Clause 44.06.

Clause 53.02-4 establishes bushfire fire objectives and approved measures for the siting and design of works, defensible space and construction, water supply and access.

4.4. Operational Provisions

CLAUSE 71.02-3 - INTEGRATED DECISION MAKING

This clause establishes the need for planning to meet the varied needs and expectations of Victoria to address aspects of economic, environmental and social wellbeing affected by land use and development.

This includes the direction that:

‘Planning and responsible authorities should endeavour to integrate the range of planning policies relevant to the issues to be determined and balance conflicting objectives in favour of net community benefit and sustainable development for the benefit of present and future generations. However, in bushfire affected areas, planning and responsible authorities must prioritise the protection of human life over all other policy considerations.’

4.5. Incorporated Documents

GUIDELINES FOR THE REMOVAL, DESTRUCTION OR LOPPING OF NATIVE VEGETATION (DEPARTMENT OF ENERGY, ENVIRONMENT AND CLIMATE ACTION, AUGUST 2025)

The Guidelines detail the application of Victoria’s statewide policy related to the assessing and compensating for the removal of native vegetation.

This includes:

- The assessment of impacts from removing native vegetation on biodiversity and values.
- How offsets are calculated and established to compensated for the loss in biodiversity value from the removal of native vegetation.

The Incorporated Document provides further detail on the application of the three-step approach (avoid-minimise-offset), the assessment pathways for different application types, the management of offsets, and decision guidelines.

GOLF LINKS HERITAGE AREA STATEMENT OF SIGNIFICANCE (CITY OF GREATER GEELONG, JUNE 2022)

The Statement of Significance states the following regarding the significant heritage aspects of the golf course layout:

‘The golf course is the only known course in Australia set on a links design with its open, natural and semi-natural undulating

terrain; rolling greens and sandy hillocks; manicured greens and fairways covered in native and exotic grasses including couch grass; strategically placed and substantial cypress trees forming wind buffers, screens and visual foci within the course landscape; bunkers situated on the slopes and valleys of natural inclines; and views to the clubhouse and coastline panoramas beyond to Ocean Grove, Point Lonsdale and the Mornington Peninsula.'

The description of how and why it is significant is:

'The precinct is significant for its intact links type golf course of 1920-22 and small number of large-medium scale, interwar Bungalow houses developed on the Golf Links/Golf Lands subdivision of c.1920. Historically, the precinct was once the farmland of the Hopgood family, and later developed into the Barwon Heads links golf course (and housing subdivision) in 1920.'

The decision guidelines of the HO (Clause 43.01-8) require the responsible authority to consider the Statement of Significance when deciding on an application.

**GOLF LINKS HERITAGE AREA HERITAGE DESIGN
GUIDELINES (CITY OF GREATER GEELONG, JUNE 2022)**

The design guidelines provide direction on acceptable outcomes with regards to demolition or removal and bulk, form and appearance.

Most of the guidelines relate to changes to building form within the heritage area.

Relevant guidelines to the proposal include:

Demolition or removal

– Discourage the demolition or subdivision of the existing, significant cultural landscape forming the Barwon Heads links golf course.

Bulk, form and appearance

– Encourage a managed program of tea tree and coastal wattle removal within the precinct to ensure that the original links character and topography of the precinct is retained.

The decision guidelines of the HO (Clause 43.01-8) require the responsible authority consider the design guidelines when determining an application.

4.6. Other Planning Policy

BELLARINE STATEMENT OF PLANNING POLICY (JULY 2023)

The Bellarine Peninsula was declared a distinctive area and landscape under Section 46AO of the *Planning and Environment Act 1987* (PE Act) on 29 October 2019. It was redeclared on 16 September 2021, which commenced on 30 October 2021.

Amendment VC2026, which implemented the Bellarine Peninsula SPP into the Greater Geelong Planning Scheme, was gazetted on 13 February 2026.

A declaration of a distinctive area or landscape for an area of Victoria can occur under Section 46AO of the PE Act if it has a majority of the attributes specified in Section 46AP of the Act and the attributes are under threat of significant or irreversible land use change that would affect the environmental, social or economic value of the land. The specified attributes include: outstanding environmental, geographical, heritage, cultural, natural resource or productive land, strategic infrastructure or built form significance.

Under the PE Act, the Minister for Planning must prepare a Statement of Planning Policy (SPP) for a declared area, the purpose of which is to create a framework to guide the future use and development of land within the declared area to ensure appropriate protection and conservation of its distinctive attributes.

The Bellarine Peninsula Statement of Planning Policy (SPP) forms part of the Victoria Planning Provisions, which requires that responsible public entities must consider the SPP when making decisions within the Bellarine Peninsula declared area.

The Bellarine Peninsula declared area framework plan (Map 3 on p. 23 of the SPP) identifies the subject land as being within an 'State-significant Bellarine Peninsula Southern Coast landscape'. Map 6 (p. 40) shows the subject land as being within the Bellarine Southern Coast landscape area.

The Bellarine Southern Coast landscape area is described (p. 47) as follows:

'The entire southern edge of the Bellarine Peninsula declared area is composed of coastal cliffs and dunes forming the Bellarine Southern Coast landscape area. Wild seas and high winds have given rise to a varied and often-dramatic landscape of sandy beaches, high dunes, low cliffs and rocky

headlands, which stretches from Queenscliff to Breamlea. Steep escarpments are vegetated with indigenous coastal species, and landmark features (such as The Heads at Point Lonsdale and The Bluff at Barwon Heads) punctuate a typically rugged surf coast with sweeping beaches and dunes. As well as dramatic, high dunes, the iconic landform of The Heads features limestone cliffs and a vast intertidal rock platform that stretches beneath The Rip across to Point Nepean. The Ocean Grove and Thirteenth Beach coasts feature high-energy surf beaches backed by extensive dunal systems, as well as wild and spectacular sea views. Significant built-form, historic-heritage features in this landscape include the Point Lonsdale Lighthouse and the historic settlement of Queenscliff. The dramatic Bass Strait edge to the south contrasts with the more sedate northern frontage to Swan Bay.'

Strategies in Section 5.3.3 include Strategy 3.7, which is to:

'Conserve and increase native coastal and indigenous vegetation, particularly along waterway and roadside corridors, within vegetation reserves and areas adjacent to existing remnant vegetation, by setting aside new reserves and revegetating land in keeping with the ecological vegetation classes.'

Chapter 5.6 'Tourism, agriculture and natural resources' identifies that tourism attractions and experiences, including golfing, will continue to be fundamental part of the economy.

Objectives and strategies within Section 5.6.4 include:

Strategy 6.3 – Ensure that land use and development for visitor and recreational activities conserve the primary rural land use and the associated buffers as well as environmental, landscape and cultural heritage values.

Strategy 6.4 – Ensure tourism infrastructure is designed, located and maintained to preserve significant landscapes and views of them.

Figure 4-4: Extract of Bellarine Peninsula declared area framework plan (Map 3)



Source: Bellarine Peninsula Statement of Planning Policy, p. 23

5. Planning Policy Framework

5.1. Planning Policy Framework (PPF)

The following PPF provisions most relevant to this proposal are:

- Clause 11.03-5S – Distinctive areas and landscapes
- Clause 11.03-6L-01 – Bellarine Peninsula
- Clause 12.01-1S – Protection of biodiversity
- Clause 12.01-1S – Protection of biodiversity
- Clause 12.01-2S – Native vegetation management
- Clause 13.02-1S – Bushfire planning
- Clause 15.03-1S – Heritage conservation
- Clause 15.03-1L – Heritage conservation
- Clause 15.03-2S – Aboriginal cultural heritage
- Clause 17.04-1S – Facilitating tourism

5.2. Municipal Planning Strategy (MPS)

The following parts of the MPS are most relevant:

- Clause 02.01 – Context
- Clause 02.02 – Vision
- Clause 02.03-1 – Settlement
- Clause 02.03-2 – Environmental and landscape values
- Clause 02.03-3 – Environmental risks and amenity
- Clause 02.03-5 – Built environment and sustainability

These provisions will be discussed in more detail in the assessment in Section 6.

6. Planning Considerations

Clause 71.02-3 of the Greater Geelong Planning Scheme seeks to facilitate integrated decision making by balancing conflicting objectives in favour of net community benefit and sustainable development.

In this instance, the historical zoning and existing context is for the use and development of the land as a golf course. The proposed buildings and works to establish the maintenance hole are necessary to ensure effective operational management of the course. In turn, this enables the Club to continue to provide a key recreational and tourism offer for members and guests.

The concept of a maintenance hole for maintenance purposes is an accepted practice in the golfing industry and has been added to the layouts of other courses in similar natural settings as The Barwon Heads Golf Club.

Sorrento Golf Club obtained permit approval for the addition of a maintenance hole to its layout, which opened in 2019. The project required removal of native vegetation, which was supported by the preparation of a Vegetation Management Plan for the course.

An article detailing this process is attached at **Appendix C** of this report.

The proposal requires the removal of native vegetation and the design has been informed by the ‘avoid-minimise-offset’ three-step approach pursuant to Clause 52.17 and the Guidelines for the removal, destruction or lopping of native vegetation. The Guidelines establish a clear application pathway and decision guidance for decision makers on what is an acceptable outcome.

This planning assessment considers the following matters as relevant to the application:

- Is there strategic justification for the proposal?
- Is the removal of native vegetation justified considering the provisions of the Greater Geelong Planning Scheme?
- Is the proposal an acceptable heritage outcome?

- Have bushfire management matters been appropriately addressed?
- Are car parking considerations relevant to the application?

These are discussed in further detail in turn below.

6.1. Is there strategic justification for the proposal?

The proposed addition to the golf course is consistent with the purpose of the SUZ3 to provide for the use and development of private golf courses and to ensure that the use and development for that purpose does not prejudice the amenity of surrounding area.

Clause 02.03-1 of the Municipal Planning Strategy identifies the Bellarine Peninsula as having highly valued tourist function and environmental attributes. The strategic directions include protecting the rural and coastal environment and landscapes on the Bellarine Peninsula.

Clause 02.03-5 refers the direction of the Bellarine Peninsula SPP which establish green breaks to promote conservation, agriculture, nature-based tourism, recreation and natural resource development that is appropriate to the landscape character.

The objective of Clause 11.03-5 ‘Distinctive areas and landscapes’ is to recognise the importance of distinctive areas and landscapes, which included the Bellarine Peninsula, to the people of Victoria and enhance the valued attributes of identifies or declared distinctive areas and landscapes.

Strategies include enhancing conservation of the environment, including the unique habitats, ecosystems and biodiversity of these areas as well as recognising the important role these areas play in the state as tourist destinations.

Golf is part of the Bellarine Peninsula tourism experience and the upgrade to the existing golf course to maintain that experience is consistent with the policy direction of Clause 17.04-1S ‘Facilitating tourism’. Improvement of existing facilities, as well as new tourist development, is part of maximising the economic, social and cultural benefits of the state being a competitive domestic and international tourist destination. Considerations relating to tourism in rural or

coastal and maritime locations are not relevant to this application as the subject land is within the SUZ3 which has the specific purpose of facilitating the use and development for private golf courses.

The Bellarine Peninsula SPP identifies that the proposed building and works are occurring within the ‘State-significant Bellarine Peninsula Southern Coast landscape’. The strategies, as detailed in Section 4 above, include supporting tourism use and development where ecological, cultural and landscape values are preserved.

The SPP is required to be considered by public entities when making decisions within the Bellarine Peninsula declared area.

It is considered that the vegetation will be removed in a location, which already exhibits a character of cleared areas bordered by retained species. The golf course has been a long-standing use and development outcome in the location. The SPP does acknowledge that tourism activities, such as golfing, are important elements of the Bellarine Peninsula economy. The proposal remains consistent with the direction of Strategy 6.3 as its context is typified by the golf uses of both The Barwon Head Golf Club and neighbouring Thirteenth Beach Golf Links, rather than a rural character. The building and works will be typical of this prevailing landscape character.

The visual effect of the vegetation removal will be limited outside of the subject land. A buffer to the residential properties to the south will be retained. The built form of the properties on Stephens Parade and the extensive vegetation further to the south effectively minimises views of the works from the south.

The works to the golf course are outside of the direction for Barwon Heads as expressed within Clause 11.03-6L-01 ‘Bellarine Peninsula’ as informed by the Barwon Heads Structure Plan Map which does not include particular outcomes for The Barwon Heads Golf Club land.

6.2. Is the removal of native vegetation justified considering the provisions of the Greater Geelong Planning Scheme?

The applicable planning controls and policy framework provide clear direction for the preparation and assessment of proposals involving the removal, destruction or lopping of native vegetation.

The objective of Clause 12.01-2S 'Native vegetation management' is to ensure that there is no net loss to biodiversity because of the removal, destruction or lopping of native vegetation. The clause reiterates the three-step approach detailed in Clause 52.17 and the guidelines, being:

- *Avoid the removal, destruction or lopping of native vegetation.*
- *Minimise impacts from the removal, destruction or lopping of native vegetation that cannot be avoided.*
- *Provide an offset to compensate for the biodiversity impact from the removal, destruction or lopping of native vegetation.*

Other native vegetation considerations within controls and policy of the Greater Geelong Planning Scheme include:

- Clause 12.01-1S 'Protection of biodiversity' seeks to protect and enhance Victoria's biodiversity. Strategies are to ensure that decision making accounts for the impacts of land use and development on Victoria's biodiversity, including cumulative impacts, fragmentation of habitat, and the spread of pest plants, animals and pathogens into natural ecosystems. The strategies also include identifying, protecting and managing important areas of biodiversity.
- Local policy Clause 12.01-1L seeks to ensure that land use and development enhance areas of native vegetation and other habitats.
- The impact of the proposal on native vegetation both on the subject land and neighbouring properties is a decision guideline within the SUZ3.

The design of the maintenance hole proposal has been prepared applying the avoid-minimise-offset process set out in Clause 52.17 and the Guidelines.

The hole layout will result in the removal of 0.93 hectares of Coastal Alkaline Scrub, comprising 0.58 hectares of full removal and 0.353 hectares of partial removal.

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 use of the course has increased by 15 per cent during the five-year-period between 2019 and 2024.

The maintenance hole allows for effective course management by providing the ability to temporarily removal individual holes from play to undertake turf renovation, drainage upgrades, irrigation repairs, tree manage, storm damage recovery and other essential works.

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. The maintenance hole is proposed to be designed and maintained at the same standard as the rest of the course to allow it to be substituted into play without a noticeable reduction in quality.

The submitted Risk Mitigation Matrix and Environmental Risk Assessment, prepared by epar Pty Ltd, details 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. When required, the hole will be accessed via a path from the 10th hole green while its proposed green will be exited to the west via a path leading the 11th hole tee. The proposed location was selected with consideration of course, routing, safety, operational efficiency and environmental impact.

The location allows the hole to be integrated into the playing round without requiring players to backtrack, cross fairways unnecessarily or disrupt the natural sequence of play. These are important considerations with regards to safety and course management.

Alternative locations within the course were considered as part of the assessment, noting that vegetation is positioned extensively along the southern extent of the course. This included the use of a hole from the par 3 course, located to the north of the existing course.

This is not a suitable option for retaining the effective operation of the main course experience. The par 3 course

caters for beginners, families and casual players, providing a different golfing game. It is largely used by the Barwon Heads community and is regarded as a community asset.

The use of a hole within the par-3 course would disrupt the community function as well as introducing safety and operational complexities through the mixing of different playing groups and disrupting the flow and integrity of both courses.

Working on the decided locations, the hole design has been rationalised to achieve an effective golf hole for the players while avoiding and minimising the extent of removal. The design process has been refined as informed by ecological assessment and feedback which tested the design impact.

The hole design avoids impact to native vegetation through the following aspects (as detailed in the Okologie Consulting vegetation assessment):

- The hole length and size of the playing areas (tees, fairway and green) and access paths were rationalised to an effective size.
- The tees have been sized to allow for the retention of the endangered species Coast Wirilda (*Wirilda uncifolia*) to the north and south of the location.
- The hole alignment is through a modified area of Coastal Alkaline Shrub where partial removal is proposed where higher quality areas of native vegetation feature.
- The partial removal is achieved through the pruning of shrubs to 750 millimetres and retaining all understory cover. The height will be maintained through ongoing course management.

The total area of the proposed hole (7,200 square metres) is reduced from that of the 2018 application (8,010sqm). As detailed in Section 3, the vegetation removal of the current proposal is greater than that of the 2018 application due to a different approach of the applications in defining and calculating the extent of vegetation removal. The current application adopts a more conservative approach of appropriately considering areas where golf activities will occur, such as around the tees, as being removed.

The application requires a detailed assessment pathway in accordance with the Guidelines (DEECA 2025).

A general offset amount of 0.428 general habitat units with a minimum strategic biodiversity value score of 0.622 is

required. The offset will be sourced as third party offset through the Native Vegetation Credit Register. Evidence of the offset availability is provided in Appendix 8 of the submitted Vegetation Assessment report.

In summary, the native vegetation removal is an acceptable planning outcome as:

- The proposed works has applied the three-step approach of the Guidelines.
- This has included consideration of alternative locations/operations which were assessed as not being an effective solution for the established golf course use.
- The design has avoided and minimised the removal of vegetation through a compact layout and sections where only partial removal is proposed.
- The assessment has considered vegetation lost in locations where the golf activity will occur.
- The third-party offset can be secured with the required strategic biodiversity score in an appropriate location.
- The preparation of the Land Management Strategy provides a framework for the preservation and enhancement of native vegetation on the golf club land, including the management of Coastal Tea Tree through ecological thinning.

6.3. Are any potential amenity effects on adjoining properties effectively managed?

The purpose of the SUZ3 includes ensuring that the use and development of land for the purpose of private golf courses does not prejudice the amenity of surrounding properties. Decision guidelines within Clause 4.0 related building and works include the interface of the site with adjoining zone.

The proposed works do result in the golf course layout moving closer to the residential properties to south, which front Stephens Parade where the properties are within the LDRZ.

The hole will be in play infrequently when it is substituted into play to allow for the maintenance or rest of another hole of the golf course. The works themselves will be low scale earthworks that will not result in new structures within the landscape. The partial removal of vegetation will occur within approximately 14 metres off the boundary of an adjoining

property to the south. The closest point of the fairway will be approximate 24 metres.

The intervening space will remain vegetated providing a visual screen to the area.

The golf course is a longstanding use within the location, and the housing has been established within the context. The golf course is a relatively benign land use with regards to potential amenity effects. Noise creating aspects of the use, such as the movement of vehicles from the site, will not be a feature in the location. Players on the course will be present during daylight hours and will move through the location as the play progresses, rather than congregating in the space.

Again, this will in the instances when the hole is required to be in play. There is no intention for the hole to become part of the course on a rotation basis. It will be an irregular occurrence when the repair and rest circumstances for other holes arise.

Overall, the proposed works will provide for effective operation of the golf course without unduly affecting the amenity of the adjoining properties within a residential zone.

6.4. Is the proposal an acceptable heritage outcome?

The addition of the maintenance hole is a complementary feature to maintain and enhance the condition and function of the existing heritage golf course.

The purpose of the HO includes ensuring that development does not adversely affect the significance of heritage places.

Clause 02.03-5 'Built environment and sustainability' seeks to conserve and enhance individual heritage places and areas of pre- and post-contact heritage significance.

Clauses 15.03-1S and 15.03-1L provide policy direction with regards to heritage protection. Strategies within Clause 15.03-1S include encouraging appropriate development that respects places with identified heritage values and ensure an appropriate setting and context for heritage places is maintained and enhanced.

Development on the golf course land is specifically directed by the *Golf Links Heritage Area Statement of Significance (City of Greater Geelong, June 2022)* and the *Golf Links Heritage Area Design Guidelines (City of Greater Geelong, June 2022)*.

The proposal is consistent with the Statement of Significance which includes the links-style golf course and associated

vegetation as well as surrounding residential development, including part of Stephens Parade, where the large allotments and wide setbacks form part of the golf course context.

The direction within the Design Guidelines with regards to building and works for additions to the golf course heritage area mostly relate to building rather than the course layout. The proposed works will not change the existing layout, therefore is consistent with the direction on demolition or removal to: *'retain the open, undulating, links course design, with its rolling greens and sandy hillocks; manicured greens and fairways covered in native and exotic grasses including couch grass, and the bunkers'*.

The application is supported by a Land Management Strategy, which includes detail on the ongoing works to remove tea tree and coastal wattle consistent with the direction of the Design Guidelines.

Overall, the building and works proposed will add to the existing links course in a manner consistent with the character identified in the Statement of Significance and aligns with the preferred outcomes of the Design Guidelines.

6.5. Have bushfire management matters been appropriately addressed?

The BMO and the policy direction of the Greater Geelong Planning Scheme place a priority on the preservation of human life in the consideration of the risk of bushfire to a planning proposal.

Clause 02.03-3 'Environmental risks and amenity' includes the strategic direction to protect areas at risk of bushfire and ensure that development in susceptible areas responds to the risk of bushfire.

The policy of Clause 13.02-1 'Bushfire planning' is to be applied to all decision making under the Planning and Environment Act 1987 to land where the BMO applies (among others).

The objective of the policy is to strengthen the resilience of settlements and communities to bushfire through risk-based planning that prioritises the protection of human life.

It is submitted that the proposed building and works do not increase the bushfire risk associated with the ongoing use of the land for a golf course for the following reasons:

- It does not introduce a permanent structure to the golf course land within the BMO.

- The intensity of the use is not proposed to change through the works as only 18 holes will remain in play at any one time.
- People will not be encouraged to congregate in large numbers at the location due to the proposed works.

It is considered that the nature of the proposed building and works are an acceptable outcome within the BMO and that the risk to human life is not increased by the outcome sought.

6.6. Are car parking considerations relevant to the application?

As noted in Section 4.3, the statutory car parking rate for golf course in Clause 52.06-5 is calculated on a per hole basis. However, the addition of the maintenance hole does not change the nature of the use which will remain an 18-hole golf course. The hole will only be used where another is taken out of play for repair or rest. No additional car parking spaces are part of the proposal.

The building and works do not result in an intensification of the use where more players attending the course at one time. It is submitted that the proposal does not practically trigger requirement for the reduction for a permit under Clause 52.06-3 as the proposal is not seeking to reduce the number of spaces required for the use under Clause 52.06-5.

The provision of car parking is also a consideration in the decision guidelines the SUZ3 (Clause 4.0), which is considered satisfied as above as it presents no practical change to the function of the use.

7. Conclusion

It is submitted that the proposed building and works and native vegetation removal to achieve the maintenance hole for the course of The Barwon Heads Golf Club is an acceptable planning outcome for the following reasons:

- The proposal is consistent with the MPS and PPF of the Greater Geelong Planning Scheme and SPP for the Bellarine Peninsula.
- The hole layout has been refined, including a combination of full and partial native vegetation removal, to avoid and minimise the extent of vegetation removal. The removed vegetation will be offset in accordance with the Guidelines for the Removal, Destruction or Lopping of Native Vegetation.
- The preparation of a Land Management Strategy as part of this application establishes a coordinated approach to the management of native vegetation on the subject land and the wider grounds of The Barwon Heads Golf Club.
- The building and works are consistent with the preferred heritage outcomes for the Golf Links Heritage Area as detailed in the Statement of Significance and Design Guidelines, as Incorporated Documents.
- The bushfire risk is not increased by the building and works.
- The addition of the maintenance hole will not result in any undue amenity effects on adjoining properties as part of the ongoing use of the land as a golf course.

The maintenance hole will allow for the more effective operation and safe maintenance of the golf course, ensuring that the playing experience of members and visitors and maintained. Golfing is part of the valued tourist and recreational offering of the Bellarine Peninsula, and the proposal will assist in maintaining the available of the course to meet the ongoing demand.

The proposal is regarded to achieve a net community outcome and that it is appropriate for a permit to issue.

Appendix A : Site Photos

Figure 7-1: Tee location looking west



Figure 7-2: Tee location looking to south. Residential properties fronting Stephens Parade visible in distance



Figure 7-3: Northern interface of hole with existing golf course (looking west)



Figure 7-4: View from proposed green location looking south



Appendix B : Conservation Work Exemption

Appendix C : Maintenance Hole Example