

**AMENDMENT C375 TO
GREATER GEELONG
PLANNING SCHEME**

**STATEMENT OF TOWN
PLANNING EVIDENCE**

URBIS

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1. INTRODUCTION

1. My name is Sarah Kate Horsfield and I am a Director of Urbis Pty Ltd, which conducts its business at Level 12, 120 Collins Street, Melbourne. My qualifications and experience is described in **Appendix A**.
2. I have been engaged by Best Hooper Solicitors on behalf of a joint venture between Barwon Heads Lifestyle Group Pty Ltd. to prepare town planning evidence in relation to Planning Scheme Amendment C375 to the Greater Geelong Planning Scheme, which seeks to make changes to the MSS and local planning policy framework to give effect to the Barwon Heads Structure Plan (2017).
3. My instructions are to examine the Amendment with reference to a proposal submitted by Barwon Heads Lifestyle Group Pty Ltd in relation to land at 1900 Barwon Heads Road, Barwon Heads (the 'subject land'), which seeks support to include the land within the settlement boundary for Barwon Heads.
4. In the course of preparing this evidence I have inspected the subject land and its environs, and reviewed the proposed amendment with reference to the provisions of the Greater Geelong Planning Scheme. I have also reviewed the relevant background studies, the Council Officer's report and submissions lodged by third parties.
5. A summary of my opinions with respect to the proposal is as follows:
 - There are policy grounds to warrant further consideration of the settlement boundary for Barwon Heads, which is proposed in the Barwon Heads Structure Plan.
 - The Council's assessment of growth options in the structure plan has relied upon assumptions that have not been properly tested.
 - There is potential for an expansion of the settlement boundary to occur without undermining the village character of the township or threatening important environmental and biodiversity values in the town's broader context.
 - Positive environmental and social benefits could be generated for the township through a modest expansion of the settlement boundary, which has the potential to deliver environmental improvements to the Murtnaghurt Lagoon and provides accommodation opportunities that cater for the town's growing ageing population.
 - Implementing the Barwon Heads Structure Plan via changes to the planning scheme is premature until such time as the Greater Geelong Settlement Strategy has been resolved, and the proposed 'logical inclusions' process for enshrining permanent settlement boundaries around all townships has been conducted.
6. I declare that I have made all the enquiries that I believe are desirable and that no matters of significance that I regard as relevant have, to my knowledge, been withheld from the Panel.

2. SUBJECT LAND AND SURROUNDS

The Site

7. The subject land is located at 1900 Barwon Heads Road, adjacent to the western township boundary of Barwon Heads. Figure 1 locates the site within the Barwon Heads Structure Plan context.
8. The irregular-shaped site has an area of 49.6 hectares and features gentle undulating terrain.
9. Owing to its history, the site is typified by introduced pasture cover, with a variety of trees scattered throughout the site.
10. A dense section of vegetation is located on the north-eastern corner of the site, adjacent to 75 Geelong Road, and the Barwon Heads Road interface features a well-established line of trees and vegetation.
11. An informal cricket ground and synthetic cricket pitch is located in the north of the site, although views of the ground from Barwon Heads Road are obscured by a thick line of coastal vegetation.
12. The site is primarily zoned Farming Zone (FZ) with a small portion of Rural Conservation Zone Schedule 10 (RCZ10) affecting its south-western corner. The RCZ10 has been applied to protect the vegetation and faunal habitat of the Murtnaghurt Lagoon.
13. The north-western portion of the site is affected by the Land Subject to Inundation Overlay (LSIO) and the Environmental Significance Overlay (Schedule 2) is located across the site's south-west. Both these overlays relate to the Murtnaghurt Lagoon and channel system that lie to the site's south and west.
14. The site's northern edge is wholly affected by a Public Acquisition Overlay (PAO3), reserved for the potential future duplication of Barwon Heads Road. The future acquisition will be undertaken by VicRoads.

Surrounding context

15. **To the immediate north** of the subject site is Barwon Heads Road, a two-lane arterial road that largely runs east-west and is zoned Road Zone Category 1 (RDZ1).
16. On the southern side of Barwon Heads Road is 1920 Barwon Heads Road, a rural residential property of approximately 1.2 hectares (also zoned as FZ).
17. On the northern side of Barwon Heads Road is approximately 40 hectares of vacant rural landholdings (zoned FZ). A small block of land at 1939 Barwon Heads Road is zoned as Public Use Zone (Schedule 1 – Service and Utility).
18. **To the immediate east** of the site is a fully developed residential subdivision, which forms the western portion of the Barwon Heads township.
19. Snead Street, accessed from Thomson Drive, has been laid out to cater for a potential future connection with the subject land. Although terminating in a cul-de-sac, Hopgood Place also has the potential to be extended onto the subject land.
20. **To the south** is the Murtnaghurt Lagoon, an area of significant conservation value. Further south is the Barwon Heads Golf Course, featuring an unnamed road that connects to the clubhouse.
21. **To the west** is a channel to the Murtnaghurt Lagoon to the south. This corridor features heavy native grassland until it meets the largely tree-lined boundary of the subject land.

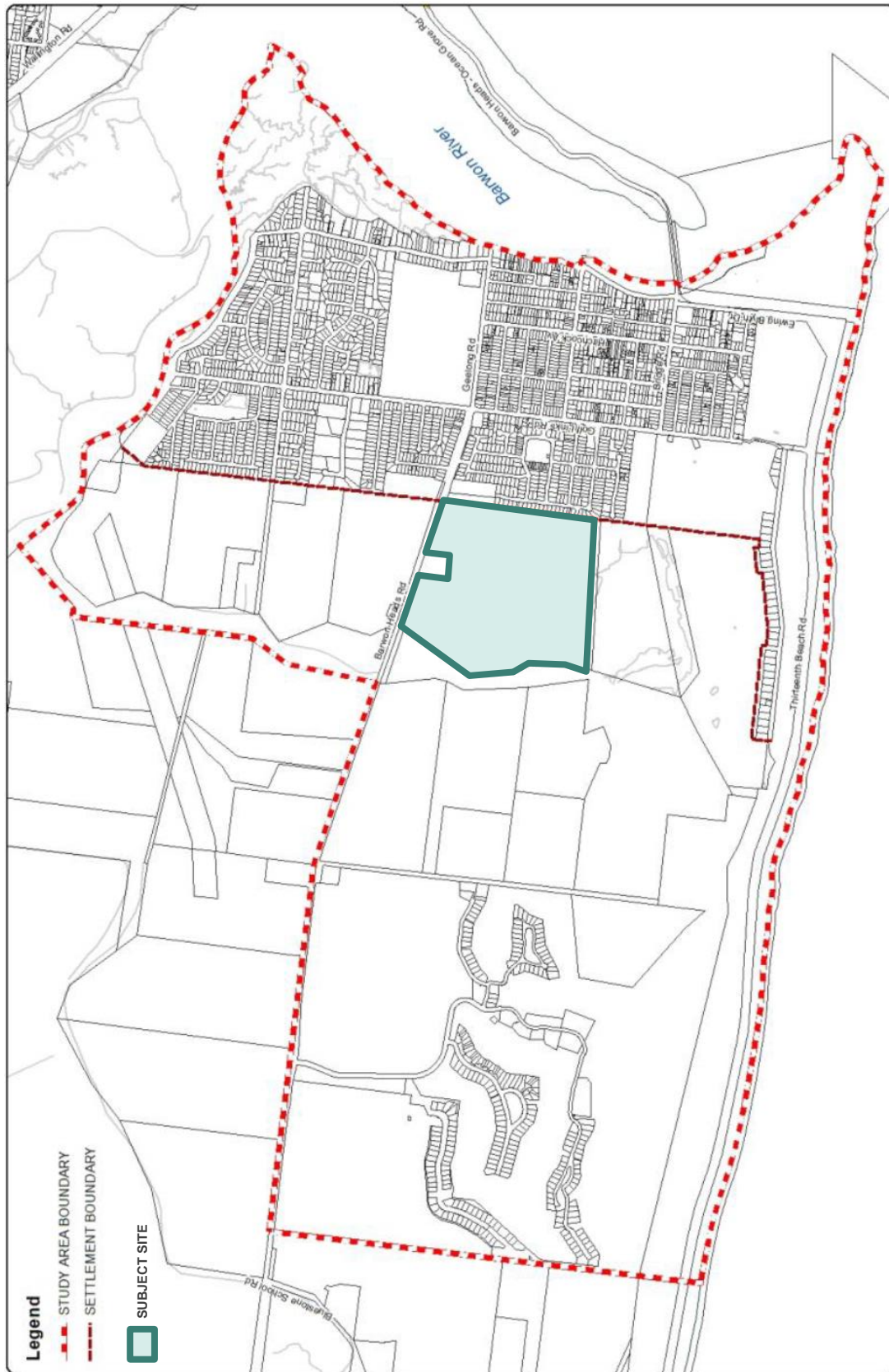


Figure 1: The subject site is adjacent to the township of Barwon Heads

3. AMENDMENT PROPOSAL

22. Amendment C375 seeks to give effect to the Barwon Heads Structure Plan 2017, incorporating its key land use directions into the planning scheme, and formalising the Plan as a reference document.
23. The amendment contemplates various changes to the provisions of the Geelong Planning Scheme as follows:
- Amend Clause 21.14 Bellarine Peninsula to add the key strategies of the Barwon Heads Structure Plan 2017, including an updated Barwon Heads Structure Plan Map.
 - Rezone all the land in the Residential Growth Zone Schedule 3 (except land south of Bridge Road) to the General Residential Zone Schedule 1.
 - Rezone all the land in the General Residential Zone Schedule 2 (except Warrenbeen Court properties) and the land in the Residential Growth Zone Schedule 3 south of Bridge Road, to the Neighbourhood Residential Zone Schedule 6.
 - Rezone all the properties in Warrenbeen Court from the General Residential Zone Schedule 2 to the Neighbourhood Residential Zone Schedule 7.
 - Insert a new Schedule 6 Barwon Heads Incremental Change Area to Clause 32.09 Neighbourhood Residential Zone.
 - Insert a new Schedule 7 Warrenbeen Court Residential Area, Barwon Heads to Clause 32.09 Neighbourhood Residential Zone.
 - Insert a new Schedule 41 to Clause 43.02 Design and Development Overlay, which will apply to the majority of the land being rezoned to the Neighbourhood Residential Zone Schedule 6.
 - Insert a new Schedule 42 to Clause 43.02 Design and Development Overlay that will apply to all the land being rezoned to the General Residential Zone Schedule 1.
 - Replace Schedule 6 to Clause 42.01 Environmental Significance Overlay that applies to all the properties in Warrenbeen Court, nine Saratoga Avenue properties, part of Tait's Road and fragments of farming zoned land north of Tait's Road, with a new Schedule 6 on a permanent basis. The Environmental Significance Overlay was applied in the interim by Amendment C374.
 - Amend Schedule 9 to Clause 42.03 Significant Landscape Overlay (Barwon River Environs) to ensure consistency with the proposed new Design and Development Overlays.
 - Amend Schedule 25 to Clause 43.02 Design and Development Overlay (Barwon Heads Town Centre) to provide building form consistency within the Barwon Heads Increased Housing Diversity Area.
 - Amend Clause 22.36 Heritage Overlay 1649: Flinders Heritage Area to ensure consistency with the proposed new Design and Development Overlays.
 - Replace the Barwon Heads Increased Housing Diversity Area map in Clause 22.63 with a new map to reflect the removal of residential land south of Bridge Road from the increased housing diversity area.

4. GREATER GEELONG PLANNING SCHEME

4.1. PLANNING POLICY FRAMEWORK (PPF)

24. **Clause 11** 'Settlement' states that *'planning is to anticipate and respond to the needs of existing and future communities through provision of zoned and serviced land for housing, employment, recreation and open space, commercial and community facilities and infrastructure'*.
25. **Clause 11.01-1S** 'Settlement' aims *'to promote the sustainable growth and development of Victoria and deliver choice and opportunity for all Victorians through a network of settlements.'* One of the strategies to achieve this is by providing for the *'growth in population and development of facilities and services across a regional or sub-regional network.'*
26. **Clause 11.02-1S** 'Supply of urban land' seeks to *'ensure a sufficient supply of land is available for residential, commercial, retail, industrial, recreational, institutional and other community uses'* and includes the following relevant strategies (selected):
- *'Ensure the ongoing provision of land and supporting infrastructure to support sustainable urban development.'*
 - *Ensure that sufficient land is available to meet forecast demand.*
 - *Plan to accommodate projected population growth over at least a 15 year period and provide clear direction on locations where growth should occur. Residential land supply will be considered on a municipal basis, rather than a town-by-town basis.*
 - *Planning for urban growth should consider:*
 - *Opportunities for the consolidation, redevelopment and intensification of existing urban areas.*
 - *Neighbourhood character and landscape considerations.*
 - *The limits of land capability and natural hazards and environmental quality.*
 - *Service limitations and the costs of providing infrastructure.'*
27. **Clause 11.03-4S** 'Coastal settlement' seeks to *'plan for sustainable coastal development'* with the following strategies:
- *'Plan and manage coastal population growth and increased visitation so that impacts do not cause unsustainable use of coastal resources.'*
 - *Support a network of diverse coastal settlements that provide for a broad range of housing types, economic opportunities and services.*
 - *Encourage urban renewal and redevelopment opportunities in existing settlements to reduce the demand for urban sprawl.*
 - *Identify a clear settlement boundary around coastal settlements to ensure that growth in coastal areas is planned and coastal values are protected. Where no settlement boundary is identified, the extent of a settlement is defined by the extent of existing urban zoned land and any land identified on a plan in the planning scheme for future urban settlement.*
 - *Direct new residential and other urban development and infrastructure to locations within defined settlement boundaries of existing settlements that are capable of accommodating growth.*
 - *Support the sustainable management of growth around coastal, estuary and marine assets to protect environmental values, and to achieve regional economic and community benefits.*
 - *Avoid linear urban sprawl along the coastal edge and ribbon development in rural landscapes.*
 - *Protect areas between settlements for non-urban use.*
 - *Avoid development on ridgelines, primary coastal dune systems and low lying coastal areas.*

- *Encourage the restructure of old and inappropriate subdivisions to reduce development impacts on the environment.*
 - *Ensure a sustainable water supply, stormwater and sewerage treatment for all development.*
 - *Minimise the quantity and enhance the quality of stormwater discharge from new development into the ocean, bays and estuaries.'*
28. **Clause 12.01-1S** 'Protection of biodiversity' aims to 'assist the protection and conservation of Victoria's biodiversity.' Key strategies include:
- *Use biodiversity information to identify important areas of biodiversity, including key habitat for rare or threatened species and communities, and strategically valuable biodiversity sites.*
 - *Strategically plan for the protection and conservation of Victoria's important areas of biodiversity.*
 - *Ensure that decision making takes into account the impacts of land use and development on Victoria's biodiversity.*
 - *Avoid impacts of land use and development on important areas of biodiversity.*
 - *Consider impacts of any change in land use or development that may affect the biodiversity value of national parks and conservation reserves or nationally and internationally significant sites; including wetlands and wetland wildlife habitat designated under the Convention on Wetlands of International Importance (the Ramsar Convention) and sites utilised by species listed under the Japan-Australia Migratory Birds Agreement (JAMBA), the China-Australia Migratory Birds Agreement (CAMBA), or the Republic of Korea-Australia Migratory Bird Agreement (ROKAMBA).*
29. **Clause 12.02-1S** 'Protection of coastal areas' seeks to 'recognise the value of coastal areas to the community, conserve and enhance coastal areas and ensure sustainable use of natural coastal resources.'
30. **Clause 13** 'Environmental Risks' states that 'planning should adopt a best practice environmental management and risk management approach which aims to avoid or minimise environmental degradation and hazards. Planning should identify and manage the potential for the environment, and environmental changes, to impact upon the economic, environmental or social well-being of society.'
31. **Clause 13.01-2S** 'Coastal inundation and erosion' seeks to 'plan for and manage the potential coastal impacts of climate change.'
32. **Clause 14** 'Natural Resource Management' states that 'planning is to assist in the conservation and wise use of natural resources including energy, water, land, stone and minerals to support both environmental quality and sustainable development' and 'planning should ensure agricultural land is managed sustainably, while acknowledging the economic importance of agricultural production.'
33. **Clause 14.01-1S** 'Protection of Agricultural Land' seeks to 'to protect the state's agricultural base by preserving productive farmland' and includes the following relevant strategies (selected):
- *Identify areas of productive agricultural land, including land for primary production and intensive agriculture.*
 - *Consider state, regional and local, issues and characteristics when assessing agricultural quality and productivity.*
 - *Avoid permanent removal of productive agricultural land from the state's agricultural base without consideration of the economic importance of the land for the agricultural production and processing sectors.*
 - *Protect productive farmland that is of strategic significance in the local or regional context.*
 - *Protect productive agricultural land from unplanned loss due to permanent changes in land use.*
 - *Prevent inappropriately dispersed urban activities in rural areas.*
 - *Protect strategically important agricultural and primary production land from incompatible uses.*

- *Limit new housing development in rural areas by:*
 - *Directing housing growth into existing settlements.*
 - *Discouraging development of isolated small lots in the rural zones from use for dwellings or other incompatible uses.*
 - *Encouraging consolidation of existing isolated small lots in rural zones.*
- *Identify areas of productive agricultural land by consulting with the Department of Economic Development, Jobs, Transport and Resources and using available information. In considering a proposal to use, subdivide or develop agricultural land, consider the:*
 - *Desirability and impacts of removing the land from primary production, given its agricultural productivity.*
 - *Impacts on the continuation of primary production on adjacent land, with particular regard to land values and the viability of infrastructure for such production.*
 - *Compatibility between the proposed or likely development and the existing use of the surrounding land.*
 - *The potential impacts of land use and development on the spread of plant and animal pests from areas of known infestation into agricultural areas.*
 - *Land capability.*

34. **Clause 16.01-1S** 'Integrated housing' seeks to 'promote a housing market that meets community needs', particularly by ensuring that 'an appropriate quantity, quality and type of housing is provided, including aged care facilities and other housing suitable for older people, supported accommodation for people with disability, rooming houses, student accommodation and social housing.'

35. **Clause 16.01-7S** 'Residential aged care facilities' seeks to 'facilitate the development of well-designed and appropriately located residential aged care facilities'.

4.2. LOCAL PLANNING POLICY FRAMEWORK (LPPF)

4.2.1. Municipal Strategic Statement (MSS)

36. **Clause 21.05-4** 'Coastal environments' seeks to 'protect, maintain and enhance the coast, estuaries and marine environment' and 'respect and manage coastal processes'. Relevant strategies include:

- *Focus urban coastal development within existing urban settlements.*
- *Prevent lineal urban sprawl along the coast.*
- *Restrict development on primary dunes.*
- *Setback future land use and development from coastal areas, estuaries and coastal wetlands to provide a buffer which is adequate to accommodate coastal recession and the landward migration of coastal wetland vegetation communities such as mangroves and salt marshes.*

37. **Clause 21.06-1** 'Key issues and influences' states that by '2031, it is estimated that the municipality will need to accommodate an additional 63,000 persons. This level of population growth will generate demand for approximately 41,000 new dwellings. The region's population is ageing rapidly through the in-migration of retiring persons and the ageing-in-place of existing residents. The municipality is a popular retirement destination, particularly the coastal towns on the Bellarine Peninsula.'

38. **Clause 21.06-2** states that the 'majority of new greenfield residential development should be directed to the designated primary urban growth areas at Armstrong Creek, Ocean Grove, Drysdale/Clifton Springs, Lara and Leopold.' It also seeks to 'Ensure development occurs within designated settlement boundaries,' and 'Where possible use natural boundaries to define the edges of urban areas'.

39. **Clause 21.06-3** 'Urban Consolidation' contains various requirements to encourage urban consolidate on and housing change across the municipality, including:
- *Maximising opportunities for housing within Increased Housing Diversity Areas (as defined in Clause 22.63 Increased Housing Diversity Areas).*
 - *Supporting appropriate medium density housing in the General Residential Zone (Schedule 1) areas. Providing for incremental change in the General Residential Zone (Schedule 2) areas.*
 - *Limiting change in the Neighbourhood Residential Zone areas.*
 - *Encourage medium density housing in the Mixed Use Zone.*
 - *Require retirement accommodation to be located within urban areas, preferably within close proximity to existing or proposed activity centres and public transport facilities;*
40. **Clause 21.07-5** 'Rural Area' seeks to 'protect and enhance the Bellarine Peninsula as a productive rural area with highly significant landscapes based on farming and environmental features.'
41. Under Clause 21.14 'The Bellarine Peninsula', **Clause 21.14-1** 'Key issues and Influences' states how rural and coastal areas on the Bellarine Peninsula form an important non-urban break between settlements. It also confirms that the '*Bellarine Peninsula is one of the fastest growing areas in the City of Greater Geelong. Population growth on the Bellarine Peninsula is being driven by the attractiveness of the peninsula as a relaxed lifestyle destination within close proximity to urban Geelong*'. **Clause 21.14-2** 'Objectives' identifies strategic directions (selected) related to the Barwon Heads region:
- *Maintain a compact urban form and avoid outward sprawl.*
 - *Protect the unique character of Barwon Heads as a coastal village located within a sensitive environment and significant landscape setting.*
 - *Restrict new commercial development to the existing business and mixed use zones in Hitchcock Avenue between Bridge Road and Ozone Road and the south side of Bridge Road.*
 - *Ensure new housing development complements the character of Barwon Heads and provides for a variety of housing sizes and types.*

4.2.2. Local Planning Policies

42. **Clause 22.05** 'Agriculture, Rural Dwellings and Subdivision' describes the high value of rural areas of the City of Greater Geelong for their '*contribution to the economy, liveability and amenity of the whole municipality. Land use and development in rural areas must be carefully managed to ensure that the ongoing use of land for agriculture is supported and the farming character of the area is preserved.*' **Clause 22.05** has the following objectives (as relevant):
- *To support the ongoing use of the rural areas for agriculture and to preserve their farmed rural landscape.*
 - *To ensure that the development of dwellings and excision of existing dwellings in the Farming Zone is consistent with the purpose of the zone and the utilisation of the land for sustainable rural uses.*
 - *To protect agricultural production and the normal operation of agricultural activities by preventing land use conflicts, particularly conflicts associated with the introduction of non-farm related dwellings into rural areas.*
 - *To limit development of new dwellings on prime or high quality agricultural land.*

5. ASSESSMENT

43. My assessment of the Amendment proposal has primarily focused on an examination of the following matters:
1. The strategic basis of the Barwon Heads Structure Plan (BHSP) and its alignment with key state and local planning policy goals.
 2. The appropriateness of the proposed settlement boundary and the approach to growth management that underpins the Structure Plan.
 3. The proposal to include land at 1900 Barwon Heads Road within the settlement boundary, and whether there is adequate strategic justification to further investigate the urban potential of this land and its integration within the township boundary.
44. To inform my assessment I have reviewed the evolution of strategic planning policy for Barwon Heads dating back to the original 1996 Structure Plan, as well as the changes in policy that have shaped the approach to growth management for Greater Geelong over that time.
45. This context sets a critical frame for consideration of the current amendment proposal, revealing a historical approach to growth management of the township that has remained virtually unchanged over a 20-year period. While I accept that Barwon Heads is not a town that has been earmarked by policy for significant growth at any point over this period, this does not in my opinion warrant a 'lock down' approach to the town's sustainable growth and evolution. This is essentially the approach that has been taken by both the current and previous iterations of the BHSP.
46. In my opinion the BHSP has failed to direct proper consideration to the ways in which a sustainable and modest form of township growth could occur, in a manner consistent with the town's identified values, character and vision.
47. I believe the BHSP's flawed assessment of potential growth options makes the question of the settlement boundary very much within the scope of this amendment. I recognise that further work would be required in order to resolve the specific location of the boundary, which largely falls outside the scope of the current amendment. Nevertheless, I believe the Panel has an obligation to consider whether the BHSP has advanced a sound and strategically considered approach to growth management. My assessment concludes that the BHSP falls short in this regard, and that a further re-examination of the growth options and settlement limits of the town is warranted by Council before the Structure Plan proceeds to implementation.
48. I have set out my reasoning and further thoughts on these matters in the following sections.

5.1 Planning Policy Framework

49. The Planning Policy Framework and *Plan Melbourne 2017-2050* are unambiguous in their policy focus on directing investment and growth to key regional centres, elevating Geelong in particular as Victoria's second city. Clause 11 provides clear direction around the approach to managing urban growth in regional centres, which is underpinned by:
- a. Ensuring regions are planned in accordance with an overarching regional growth plan (in this case, the G21 Growth Strategy for Geelong).
 - b. Planning to accommodate population growth over a 15 year period, and directing where that growth should occur.
 - c. Considering residential supply on a municipal rather than town by town basis.
 - d. Providing for appropriately located supplies of residential, commercial, and industrial land across a region, sufficient to meet community needs.
 - e. Providing for settlement breaks between towns to maintain their unique identities.
 - f. Requiring a settlement boundary for all towns.
 - g. Ensuring that planning for urban growth takes into account opportunities for consolidation and intensification of existing urban areas, the character and landscape values of existing settlements, the limits of land capability, environmental considerations, servicing limitations and

the need to monitor development trends and land supply and demand for housing and industry over time.

50. In the face of unprecedented population growth over the past 5 years, Greater Geelong City Council has recently prepared a draft Settlement Strategy (May 2018), which seeks to provide clear direction about how and where future growth will be accommodated, drawing on the principles of Clause 11.0 above.
51. The strategic basis of the Settlement Strategy is founded in the G21 Growth Strategy, prepared in 2013, which defines a clear hierarchy of settlements and future growth areas based on their strategic role and capacity to accommodate growth. Central to this approach is the designation of clear settlement boundaries for all towns, which is intended to occur through comprehensive Structure Planning processes for each town.
52. Barwon Heads is described in the G21 Strategy as a lower order settlement, which means that it is not a designated growth location. The Strategy explains the role of Barwon Heads and other small settlements as follows:
- 'The region's other rural and coastal settlements will continue to experience modest growth and play an important tourism and agricultural role to surrounding areas. Growth will be limited to identified structure plan settlement boundaries.'* (G21 Strategy, p. 27)
53. Other aspects of the Planning Policy Framework also provide important direction around the settlement boundary concept and how it should be applied in the context of Barwon Heads. In particular, Clause 11.03 sets out policy in relation to coastal planning, requiring the establishment of settlement boundaries around coastal townships to ensure coastal values are protected.
54. The Victorian Coastal Strategy (VCS) takes this further, designating the status of coastal towns as having high, moderate or low growth capacity. Barwon Heads is in the Low Growth Capacity category, which is described as *'Growth contained within existing urban or appropriate zoned land primarily through infill capacity and renewal within defined settlement boundaries'*.
55. The VPP Practice Note on "Implementing a Coastal Settlement Boundary" is also a helpful reference in this matter, in that it provides specific direction on the matters to be considered in defining an appropriate boundary. In particular, it states:
- *'The location of a coastal settlement boundary should be established through a strategic planning process with a 10 year planning horizon. This process should identify the:*
 - a. *desired future vision for a settlement*
 - b. *role and function of the settlement in comparison with other settlements within the region*
 - c. *constraints on development such as topography, native vegetation, rural land-use activity and areas of environmental or landscape significance and sensitivity*
 - d. *areas with susceptibility to flooding (both river and coastal inundation), landslip, erosion, coastal acid sulfate soils, salinity, wildfire or geotechnical risk*
 - e. *supply/demand of land within a 10 year planning horizon and opportunities for future growth (if any).'* (PPN 36: Implementing a Coastal Settlement Boundary)
56. It goes on to state that *'Any change to a coastal settlement boundary should be the product of a comprehensive strategic review. This will involve assessment of progress against the established coastal settlement boundary in the context of other planning issues arising across the municipality.'*
57. Clauses 11.03, 12.01 and 14.01 are also influential in determining the settlement boundary location: Clause 11.03 requires the protection and enhancement of distinctive landscapes through implementation of Bellarine Peninsula Localised Planning Statement; Clause 12.01 reinforces the need to avoid impacts of land use and development on important areas of biodiversity (which in this case include the Lake Connemara Complex, coastal environment and Murtnaghurt Lagoon and channel wetland), and Clause 14.01 seeks to protect productive agricultural and rural land from urban encroachment.

58. On the strength of the policy frameworks above, Council has concluded that there is no policy basis for any form of expansion of the settlement boundary for Barwon Heads, and that any proposal to change to the boundary would be contrary to state planning policy.
59. I find this approach to be somewhat limiting, reflecting an over-simplified interpretation of the policy frameworks. I say this for a number of reasons:
- a. The settlement boundary for Barwon Heads was defined at a point in time (the 1996 BHSP), based on existing residential zoned land at the time. It has remained virtually unaltered in the 22 years since it was first put in place, notwithstanding that the growth rate for Geelong was 0.6% per annum at the time it was introduced in 1996, and it is now over 4 times that rate according to the draft Settlement Strategy (2.5% per annum between 2014-16).
 - b. The G21 Growth Strategy contemplates modest growth in the lower order settlements on the Bellarine Peninsula like Barwon Heads. This does not in my view mean no growth, nor does it preclude opportunities for new urban growth where it can be shown to be compatible with the vision for the town, its strategic role and character, and its environmental context.
 - c. I do not believe such opportunities have been seriously investigated, despite the fact that there have been numerous requests to consider a westward expansion of the boundary over the past 14 years, as well as a Panel report that specifically recommended that Council further investigate this opportunity (Panel Report for Amendment C159).
 - d. Council places considerable emphasis on the fact that Clause 11.02-1S states that planning for residential supply is to be considered on a municipal rather than town by town basis. I do not believe this policy establishes justification to simply shut down supply in certain locations on the basis that there may be supply capacity in other locations in the broader region.
 - e. The residential market across Geelong is not homogenous – it caters for first home buyers, commuter population growth, holiday home demand and permanent residents. To suggest that unmet demand for housing in Barwon Heads can simply be relocated to the designated growth areas of Armstrong Creek or the new northern growth area, reflects an overly simplistic understanding of the residential market and the way that sub-markets operate. It also ignores other important state policy objectives at Clause 16.01-3S and 16.01-7S in relation to the achievement of housing diversity and choice, affordability, and ensuring there is appropriate housing for communities to age in place. In my opinion, these policy considerations have been largely ignored in the BHSP.
 - f. Council has placed considerable store in the fact that the Victorian Coastal Strategy requires coastal settlement boundaries to be defined in response to existing urban areas or existing settlement boundaries. While Planning Practice Note 36 (Implementing a Coastal Settlement Boundary) contemplates that boundaries can be reviewed from time to time in response to broader strategic considerations, Council specifically rejects that there has been any change in circumstance since 1996 that might warrant a strategic review of the boundary. I find this position difficult to accept, particularly in the context of:
 - i. The fact that Greater Geelong's population growth has risen dramatically over the previous decades. According to the draft Settlement Strategy, in the ten years to 2016, the growth rate averaged 1.7 per cent per annum and the most recent census data indicates that growth reached 2.7 per cent per annum in 2015–16. Over the last two years, population growth has exceeded that of Victoria's nine next largest regional centres combined.
 - ii. The demographic and social makeup of the Barwon Heads township has altered significantly over the period 1996- 2017. This is most evident in the growth of the population aged 55 years and over, which grew from 18% of the population in 1996, to 28% in 2011, to 34% in 2016. Despite the considerable shift in the demographic makeup of the town, I have found no evidence in the Council's history of structure planning work that it has given due consideration to the existing and future needs of the local population for aged care, retirement accommodation, specialist medical facilities, and whether such facilities can realistically be accommodated within the existing limits of the town.
 - g. PPN36 calls for any review of a settlement boundary to be undertaken via a comprehensive strategic planning process that takes into account (among other things), the supply/demand of land within a 10-year planning horizon and opportunities for future growth (if any).

- h. Council has repeatedly asserted that it is not concerned with the dwindling land supply in the town on the basis that the town does not enjoy a strategic growth role, and accordingly there is no policy imperative to review the boundary. I do not believe this approach is aligned with the direction set out in PPN 36, which contemplates boundary reviews and demands a thoroughly considered strategic process that considers supply and demand issues, natural and environmental constraints, and the role and character of the town.
- i. Council has consistently rejected the proposals for westward expansion of the settlement boundary advanced as part of the 2007 and 2017 Structure Plan reviews, on the basis of potential impacts on the biodiversity values associated with the Lake Connewarre Complex, coastal environment and Murtnaghurt Lagoon. However, by its own admission, Council has confirmed that it has not undertaken any serious investigation around whether land to the west of the boundary is capable of accommodating growth in a manner that avoids any impact on environmental values. This is confirmed in the 2017 BHSP, which states that *'Due to the lack of 'in-principle' support for development, Council has not undertaken a detailed feasibility assessment of individual sites, but has received high level advice from internal and external experts.'* It is difficult to accept Council's assertions that expansion of the boundary would pose an untenable threat to the biodiversity of the area, when no investigations to speak of have been carried out to substantiate this view.

60. For the reasons set out above, I am not persuaded by Council's position that any expansion of the settlement boundary would pose a fundamental conflict with state planning policy. There are naturally many factors that would require careful consideration in any proposal to expand the urban limits of the town, which in my view are matters that should be given proper attention and interrogation through the BHSP before it is taken any further.

5.2 Local Planning Policy Framework

61. At the local policy level, it is evident that there has been a considerable history of strategic planning work undertaken by Council for the Bellarine Peninsula and Barwon Heads township, which has sought to provide direction around how urban growth pressures will be managed and how the region's important coastal, environmental and rural landscapes will be protected.

1996 Barwon Heads Structure Plan

- 62. For Barwon Heads, this work has its origins in the 1996 Barwon Heads Structure Plan, which set out to guide the development and planning of the township over a period of ten years. The Structure Plan defined a settlement boundary at the western edge of the town to coincide with existing residential zoned land, with the expectation that it would support the growth of the town over a 10-year planning horizon.
- 63. The Barwon Heads Urban Design Framework (2003) and Bellarine Peninsula Strategic Plan 2006-2016 built on the directions of the original structure plan, and provided a foundation for the 2007 Structure Plan review.

2010 Barwon Heads Structure Plan

- 64. The 2007 draft Structure Plan again reiterated that Barwon Heads was not considered to be a designated growth location. It adopted a vision for the town, which reflected this contained approach to growth:
 - *'In the year 2016 Barwon Heads will be a unique, sustainable, residential and environmental hub; a landlocked community surrounded by pristine river, coast and wetlands. An intimate community which supports all age groups and provides a place of belonging for residents and visitors alike; where human impact is managed to support the fragile natural surroundings by:*
 - *Clearly defined limitations on urban development*
 - *Protecting and nurturing natural surroundings by managing human footprint*
 - *Supporting walking, cycling, fishing, sailing, surfing, swimming and generally enjoying*
 - *What our coastal village has to offer in an environmentally sensitive way'.*

65. In August 2007, the Structure Plan was exhibited for consultation. Importantly, the exhibited Plan showed the land at 1900 Barwon Heads Road included within the settlement boundary. The plan for the site incorporated substantial setbacks from Murtnaghurt Lagoon, with the exhibited structure plan report noting that *'the land appears physically capable of providing an expansion to the township, subject to the imposition of a range of planning and environmental provisions.'*
66. Exhibition of the draft Structure Plan attracted over 800 submissions from the community, the majority of which opposed the boundary extension. By December 2007, Council had abandoned the exhibited boundary change and reverted back to the original 1996 boundary location in the final adopted Structure Plan.

Amendment C159 to Greater Geelong Planning Scheme

67. Amendment C159 was subsequently prepared by Council to give effect to the Structure Plan through its local planning policy frameworks. The proposal for expansion of the settlement boundary occupied a considerable part of the Panel Hearing and was tested by a range of expert witnesses both in support and against the boundary change.
68. During the course of the hearing, Council advanced the following reasoning to justify its opposition to the boundary expansion:
- It would be contrary to state planning policy (including the Victorian Coastal Strategy and policy considerations regarding coastal settlement boundaries).
 - It would be counter to Council's long held policy position to direct major population growth to the larger 'district' towns, and manage smaller townships (including Barwon Heads) as areas not designated for growth.
 - It would remove farming land, undermine the 'non urban break' between the town and the 13th Beach resort, and potentially pose a threat to areas of high environmental sensitivity.
 - It would set an undesirable precedent for the westward expansion of the town, which Council would find difficult to defend.
 - Notwithstanding the dwindling lot supply, Council sees no need to take any action to increase land supply on the basis that this is not a town designated for growth.
 - It would lead to the 'loss' of the village atmosphere and would undermine the township vision.
 - Further growth was not supported by the local community.
69. On the face of it, these grounds do not appear to be unreasonable. However, when we examine the assumptions that Council has made in reaching these conclusions, a number of critical flaws in Council's reasoning emerge.
70. Interestingly, the Panel considering Amendment C159 also had difficulty accepting Council's conclusions on a number of these issues. Ultimately the Panel rejected Council's reasoning in relation to several of the issues above:
- **Contrary to state and local planning policy** – *'the Panel does not believe that the policy framework precludes the expansion of the town boundary. Nevertheless, the assessment of whether all or part of the Macafee land should be included in the settlement boundary involves the analysis of many complex and often interrelated issues...'*
 - **Potential environmental and biodiversity impact** – *'The Panel concludes that the environmental values of the area do not necessarily preclude some form of development of the Macafee land. However it is clear that the design construction and management of any development would require careful thought....the depth of the Macafee property and the distance of the central eastern section from the Lagoon and channel suggest that a significant buffer could be provided while retaining the opportunity to develop some of the land.'*
 - **Climate change impacts** – *'The Panel considers that the relatively high elevation of the central eastern section of the Macafee property indicates that it would be significantly less likely to be inundated than substantial areas of the existing town. On this basis at least, the Macafee land might be a more suitable option for accommodating population growth than urban consolidation and higher density residential development within vulnerable areas of the existing town.'*

- **Precedent** – ‘The Panel does not agree that development of the Macafee land would necessarily create a precedent for further expansion of the settlement boundary...If the Macafee land is developed, it will be developed because it is suitable for development and because it would be sensible to develop it. A similar assessment would need to be made of the land to its north and clearly there is no guarantee that it would pass these tests.’
- **Impact on Village Character** – ‘The Panel does not agree that limited development of the land need have a negative impact on the aspiration to retain a ‘village’ character for Barwon Heads.’
- **Community Opposition** – ‘The Panel believes that much of the opposition to developing the Macafee land, while well intentioned, is ill-considered. The Panel is satisfied that the land is capable of supporting limited residential development and possibly in a manner that provides a net environmental benefit.’

71. Notwithstanding the Panel’s doubts, it ultimately concluded that Council was entitled to determine that the settlement boundary should not be expanded, and that the Macafee land remain excluded. The Panel went on to urge Council and the community to reconsider their positions – the Panel believed that a limited development of this land was feasible and could be supported if it provided a net environmental benefit for the Murtnaghurt Lagoon and channel. Accordingly, the Panel recommended:

‘Council should consider the potential for limited residential development of 1900 – 1920 Barwon Heads Road as a means of achieving a net improvement to the environmental values of the Murtnaghurt Lagoon and channel. This assessment should also address the issues raised in this report.’ (Panel Report Amendment C159, p 71)

72. Council ultimately rejected this recommendation and proceeded to implement the ‘status quo’ version of the Structure Plan.

Bellarine Peninsula Localised Planning Statement

73. In 2015, further work was undertaken in the form of the Bellarine Peninsula Localised Planning Statement, which was undertaken through a collaboration between the City of Greater Geelong, State Government and Borough of Queenscliff. The Statement is a reference document at Clause 11 of the Planning Scheme, and essentially aims to: identify the key valued attributes and activities that are important to this highly distinctive and scenic coastal region; and put in place objectives and strategies to ensure that they are preserved and enhanced for ongoing use by present and future generations. The objectives and themes of the Statement echo many of those already found in the state and local planning policy frameworks for the Bellarine Peninsula.

2017 Barwon Heads Structure Plan

74. In 2017, some seven years after the C159 Panel report on the 2010 BHSP, Council embarked on a further update to the Structure Plan (i.e. the subject of this amendment).

75. At section 2.6 of the report a series of ‘key influences’ in relation to village growth, residential lot supply and further development are noted:

- *‘The size of Barwon Heads Town Centre is appropriate to cater for growth to 2031;*
- *Pressure to expand western edge of township to convert rural land to residential use;*
- *No policy support for an expansion to the western end of the township, which includes:*
 - *More than significant land supply is available at both the Municipal and Bellarine Peninsula regions within Greater Geelong.*
 - *House prices are an issue in Barwon Heads, however, there is significant housing growth occurring in the surrounding growth area locations of Armstrong Creek and Ocean Grove.*
 - *There are significant constraints for a western expansion, including impacts on environmental and coastal areas, flooding/climate change and issues around stormwater discharge.*
 - *Potential for some community benefit by way of expanded community services through the rezoning of land on the western edge;’ (Barwon Heads Structure Plan 2017; p.6)*

76. Again, Council's approach to growth management is largely reliant on the principle that as long as there is at least 15 years' supply across the municipality as a whole, supply constraints at a localised level do not warrant any action. As noted earlier, this approach is somewhat flawed in that it fails to recognise the segmentation of the housing market, and the need for housing diversity to be achieved in a localised context.
77. Environmental constraints to westward expansion are again advanced by Council as a reason to oppose any change to the boundary, which I note is counter to the findings of the C159 Panel, that such constraints would not necessarily preclude urban development on the land west of the boundary. I understand that the expert ecological report prepared by Brett Lane on behalf of Barwon Heads Lifestyle Pty Ltd confirms that subject to specific mitigation measures being adopted and implemented, urban residential development of part of the site could be achieved without impacts on significant flora and fauna on or adjacent to the study. The report further indicates that the design proposal for the site that has been put forward by Barwon Heads Lifestyle Pty Ltd has the potential to promote the health and longevity of the wetlands by protecting and enhancing its ecological values.
78. Other grounds relied upon by Council to defend its 'lock down' position on the settlement boundary include the issue of precedent, the extent of community opposition, and the potential threat to village character.
79. It is disappointing that there has been no substantive change in Council's reasoning around the settlement boundary issue since the last iteration of the BHSP, despite the Panel's explicit recommendation for serious further examination of the boundary expansion. I am not persuaded by Council's reasoning set out in Section 7 of the BHSP Background Report, and believe there are clear grounds to support a more detailed examination of the settlement boundary and the potential for a modest adjustment to be made. I have reached this conclusion for the following reasons:
- a. While Council has repeatedly refused to investigate potential growth options on the basis that there is no 'policy imperative' to consider the further growth of the town, I am not satisfied that Council has given proper consideration to other important policy considerations that are relevant to the town's growth management, most particularly in relation to housing, ageing in place, and provision for aged care.
 - b. The following elements of state and local planning policy are particularly relevant:
 - **Clause 16.0:** *Improve housing affordability by:*
 - *Ensuring land supply continues to be sufficient to meet demand.*
 - *Increasing choice in housing type, tenure and cost to meet the needs of households as they move through life cycle changes and to support diverse communities.*
 - **Clause 16.01-7S:** *Ensure local housing strategies, precinct structure plans and activity centre structure plans provide for residential aged care facilities (bold added)*
 - **Clause 16.0-1-4S:** *Requires that planning is to encourage housing that:*
 - ***Delivers an adequate supply of land or redevelopment opportunities for residential aged care facilities.***
 - ***Enables older people to live in appropriate housing in their local community (bold added)***
 - **Clause 16.01-7S:** *Provide for a mix of housing for older people with appropriate access to care and support services.*
 - **Clause 21.06-1:** *'The ageing of the population will contribute substantially to the increase in demand for low maintenance dwellings and retirement accommodation. This accommodation will need to be close to urban services...In order to meet these demands, there is a need to provide for a range of housing typologies including unit, townhouse, attached, multilevel and apartment dwellings...There is a need to maintain competition and diversity in the housing market'.*

- c. Barwon Heads is facing a significant ageing of its population, which needs to be considered in terms of the diversity of housing options available in the town to meet the needs of retired and ageing residents if the town is to provide appropriate opportunities to age in place.
- d. In 2016, almost one third (32%) of the Barwon Heads population was aged over 55. Disappointingly, the 2017 BHSP offers very little attention to the social and housing needs of Barwon Heads' significantly ageing population. While there is some acknowledgement that there is likely to be increased demand on services, multipurpose community space and accommodation to suit ageing residents, the report simply notes that there are currently very limited facilities for residents of Barwon Heads, and that the nearest facilities are located in Ocean Grove, Wallington or Leopold.
- e. It then goes on to describe that 'the Commonwealth Government's planning for aged care is on a 'needs-based planning framework''. Under the framework the Government seeks to achieve a national provision level of 125 residential and home care places for every 1,000 people aged 70 years or over by 2021-22. This figure is split into 80 places in a residential setting and 45 places in a home care setting.
- f. In the Barwon Heads, Connemare and Breamlea settlements, I understand there were 871 residents aged over 65 in 2016. By 2026, this is forecast to reach 1,215 persons, and 1,331 persons by 2036. Based on the Commonwealth benchmarks above, the local population could be expected to require an aged care facility within the town at some point over the next decade. Council does not appear to have addressed this issue in the BHSP, save to say that it is seeking to encourage adaptable housing in the Increased Housing Diversity area.
 - i. I have undertaken an assessment of vacant residential lots in the town, and have found that there are no lots of sufficient size to accommodate an aged care facility (assuming that an area of approximately 1 Ha would be required for a 100 bed facility).
 - ii. I have also examined developed lots, on the basis that an existing dwelling could be demolished to enable construction of an aged care facility. My assessment found only 4 lots of sufficient size (1ha or greater) to accommodate an aged care facility, and only 2 of these were of a size (2ha) to accommodate a retirement village. All of these lots contain well established existing dwellings.
- g. The current Amendment proposes significant changes to all existing residential zoned land in the town, including 'backzoning' about 70% of lots in the Residential Growth Zone to a General Residential Zone, and downgrading existing GRZ land to Neighbourhood Residential Zone (as well as the remaining 30% of RGZ land). In practice this will have the effect of diminishing the residential supply capacity of the town, by introducing greater constraints on the development of residential land. In particular, the areas proposed to be zoned Neighbourhood Residential will be subject to a lower site coverage of 40% (as opposed to 60% under the current GRZ), and will also be required to achieve a minimum 30% of the site as impervious. Areas presently zoned RGZ will be backzoned to a GRZ and will be required to comply with the garden area requirements that form part of this zone.
- h. Contrary to Council's assertions that the BHSP simply seeks to preserve the status quo in terms of the town's growth potential, it is evident that the consequences of the zone changes will see capacity going backwards. This reduction in capacity is not addressed in the BHSP.
 - i. I have addressed this matter in further detail in **Appendix B** of my report.
- i. The issue of precedent has been repeatedly raised by Council as justification for holding the position of the settlement boundary, stemming from concern that any westward movement of the boundary would be difficult to contain. I am not persuaded that this provides grounds to ignore consideration of individual proposals based on merit.
 - i. I note that the Panel for Amendment C159 also shared this view, rejecting the precedent argument on the basis that each case would require independent, detailed assessment to be made based on the circumstances of the land in question.
- j. Similarly, I am unconvinced that an extension of the settlement boundary would necessarily threaten the village character of the town. The subject land is positioned at the western entrance to the township, occupying land on the south side of Barwon Heads Road on the approach into

town. The site's frontage features a well-established treed wind break along Barwon Heads Road, which substantially limits views into the site.

- k. The current entry to the town is not defined by a road or specific landscape/natural form, nor is there an evident 'gateway' to mark the arrival into the town. Rather, the entry is simply marked by a line of dwellings that flank the north and south sides of the road. On the south side of the road, the majority of these dwellings form part of the Seabank estate, which is a contemporary residential estate with local street connections that terminate at the boundary to the subject land. It is conceivable that these street connections could be readily extended into the subject land to integrate with a future community on this land.
- l. I note that the Residential and Landscape Character Assessment prepared by Hansen Partnership as part of the BHSP addresses the issue of township character and notes that:
- Township character is different to neighbourhood character and is very important in the context of Barwon Heads. It is a broader concept that relates to the setting and regional context in which the overall town is located, rather than to the design or character features of individual or clusters residential buildings throughout the town.*
- m. It goes on to state that township character relates to such things as:
- Its coastal location near a surf beach and its location on the Barwon River
 - Its clearly defined urban edges and entries and approaches to the town
 - Its clearly defined Town Centre and 'heart of the town'
 - Its location within a rural and wetlands setting
 - Its separation from other towns
 - Its size and scale, being only a small village, with a relatively small population and with limited opportunities for substantial population growth.
- n. I am not persuaded that any of these elements of township character would be prejudiced by the westward extension of the settlement boundary towards the Murtnaghurt Lagoon. The site lies well within the coastal hinterland and in visual terms is strongly enclosed by vegetation windbreaks along Barwon Heads Road. It has clear potential to be physically integrated with the adjoining Seabank estate to the east, forming a logical expansion of that neighbourhood. Perhaps more importantly, it would provide the opportunity to deliver aged care and retirement accommodation to meet the needs of the town's ageing population.
- o. The adoption of the Murtnaghurt Lagoon as a boundary to the township would also give effect to Clause 21.06-2, which indicates that natural boundaries should be used to define settlement boundaries over man made boundaries.
- p. There is an argument to say that the settlement boundary of the town has already been breached with the development of the 13th Beach resort and residential estate, which occupies land to the west of the Murtnaghurt Lagoon. The development includes both permanent and tourist residential accommodation and has resulted in a small resident population that is serviced by the Barwon Heads township.

Draft Geelong Settlement Strategy

80. In addition to the reasons I have outlined above, I believe there are clear grounds to support a further review of the settlement boundary that are established through Council's draft Settlement Strategy, which was released in May 2018 for comment.
81. The Strategy's primary aim is to establish a strategic approach to managing urban growth across the municipality. Assuming population growth continues at a rate of 2.5%, the Strategy confirms that the municipality has sufficient residential supply within existing and planned growth areas to cater for demand for 25+ years.
82. In relation to the Bellarine Peninsula's role in accommodating growth, the Strategy recognises that there continues to be strong pressure to allow further development within the Bellarine towns, and equally strong pressure to protect the existing environmental and landscape qualities that make these towns so distinctive. In response, the Strategy recommends that Council should pursue options to implement permanent settlement boundaries for the Bellarine townships.

83. The strategy notes that this should involve a process similar in approach to the 'logical inclusions' process, in which clear criteria would be set to guide the consideration of landholdings with potential to be included, followed by a consultation process involving landowners and the community, and independent review by a Panel.
84. The Strategy goes on to recommend that '*A permanent settlement boundary process should commence as soon as resources allow and must precede any further township structure plan reviews.*' (p. 69) (underlining added).
85. This is reinforced at Principle 4 Direction C of the strategy, which states: '*Place structure plan reviews on hold until the permanent boundary is known.*' (p. 10)
86. In the context of these recommendations, it would seem premature to be locking in a settlement boundary for Barwon Heads into the planning scheme before the Settlement Strategy has been further progressed, and more particularly before the 'logical inclusions' process is undertaken (which I note Council has signalled is to be commenced as a matter of priority).
87. It is unclear why Council has in this case decided to proceed with a structure plan review and implementation process, when this runs counter to its own recommendations in a Strategy that is under active development. If Council's intention is to commence a logical inclusions process in the short term, I am at a loss to understand why the proposals for expansion of the settlement boundary in Barwon Heads are not being immediately referred to that process.

6 CONCLUSION

88. In summary, my assessment of the Amendment proposal has found:
- a. There are policy grounds to warrant reconsideration of the settlement boundary for Barwon Heads, which is proposed in the Barwon Heads Structure Plan.
 - b. The Council's assessment of growth options in the BHSP has relied upon assumptions that have not been properly tested.
 - c. There is potential for an expansion of the settlement boundary to occur without undermining the village character of the township or threatening important environmental and biodiversity values in the town's broader context.
 - d. Positive environmental and social benefits could be generated for the township through a modest expansion of the settlement boundary, which has the potential to deliver environmental improvements to the Murtnaghurt Lagoon and provides accommodation opportunities that cater for the town's growing ageing population.
 - e. Implementation of the Barwon Heads Structure Plan via changes to the Planning Scheme is premature until the Greater Geelong Settlement Strategy has been resolved, and the proposed 'logical inclusions' process for enshrining permanent settlement boundaries around all townships has been conducted.

Sarah Horsfield
Director

APPENDIX A STATEMENT OF QUALIFICATIONS AND EXPERIENCE

STATEMENT OF QUALIFICATIONS AND EXPERIENCE

NAME AND ADDRESS

Sarah Horsfield
Director
Urbis Pty Ltd
Level 12, 120 Collins Street
MELBOURNE VIC 3000

Qualifications

- Bachelor of Applied Science (Planning) 1995
- Masters of Business Administration (Melbourne Business School) 2006

Professional Experience

- Current Position: Director, Urbis Pty Ltd
- 2002 – 2018: Senior Planner, Associate Director and Director Urbis Pty Ltd
- 2000 – 2002: Manager Strategic Planning, City of Kingston
- 1998 – 2000: Town Planner, Tract Consultants
- 1995 – 1998: Town Planner, City of Kingston

Area of Expertise

I advise on the development of cities, their principal activities and land uses and have extensive experience in strategic and development planning. I have particular project experience involving major urban development projects across a range of localities and activities including:

- Large residential development in Melbourne's growth areas;
- Policy advice and strategic planning;
- Major retail, commercial and mixed use developments.

Expertise to Prepare this Report

Professional qualifications and expertise in town planning both in the public and private sectors.

Instructions which defined the Scope of the Report

My instructions required me to review the merits of the proposed Amendment C375, insofar as it relates to land at 1900 Barwon Heads Road, Barwon Heads. In so doing, I have relied upon those matters set down below.

Facts, Matters and Assumptions Relied Upon

I have relied upon the following in the preparation of this report:

- Inspection of the subject site and surrounds.
- Review of the Greater Geelong Planning Scheme and strategic background documents.
- Review of the proposed Amendment and supporting background documents.

Documents taken into Account

Relevant documents are described above.

Identity of Persons undertaking the work

Sarah Horsfield assisted by Evan Granger, Associate Director

Summary of Opinions

A summary of my opinions in relation to this matter is included at paragraph no. 5 of my evidence. I have made all the inquiries that I believe are desirable and appropriate and no matters of significance which I regard as relevant have to my knowledge been withheld.



Sarah Horsfield
Urbis Pty Ltd

APPENDIX B IMPACTS ON DEVELOPMENT CAPACITY

IMPACTS ON DEVELOPMENT CAPACITY

Summary of proposed changes to zones

1. Amendment C375 proposes to implement a significant change to Barwon Heads' residentially zoned land, which will curtail the township's capacity to accommodate population growth within the current township boundary.
2. The following points provide a summary of the residential zone changes proposed and the number of lots affected within Barwon Heads.
3. All land that is currently zoned as Residential Growth Zone Schedule 3 (RGZ3) will be rezoned as General Residential Zone Schedule 1 (GRZ1), except for land south of Bridge Road. This affects 551 lots.
4. The RGZ3 land south of Bridge Road is proposed to be rezoned to the Neighbourhood Residential Zone Schedule 6 (NRZ6). This affects 215 lots.
5. Amendment C367 proposes to rezone all GRZ2 land to NRZ6, with the exception of Warrenbeen Court properties. This change in zoning will affect 1,698 lots.
6. The Amendment proposes to rezone properties in Warrenbeen Court from GRZ2 to NRZ Schedule 7 (NRZ6), affecting 17 lots.

Rezoning impacts on development capacity

7. If Amendment C375 is approved, all residential lots within the township will be covered by a more restrictive zone, reducing the ability to deliver infill development.
8. 766 lots in the RGZ3 area currently benefit from a greater opportunity for higher yield due to the following elements:
 - a. A distinct zone purpose to 'provide housing at increased densities in buildings up to and including four storey buildings' and to 'encourage a diversity of housing types in locations offering good access to services and transport including activity centres and town centres'.
 - b. A maximum building height of 10.5 metres¹, as specified by the zone schedule.
 - c. No minimum garden area requirement, which affects the GRZ and NRZ.
 - d. A maximum site coverage requirement of 70%.
9. If C375 is implemented, from a development capacity perspective 551 of these lots will effectively be down zoned to GRZ1:
 - a. The maximum building height will be increased by 0.5 metres, but a mandatory three storey cap will be imposed.
 - b. A mandatory minimum garden area requirement will be applied to all lots of 400 sqm and above. The median residential lot size in Barwon Heads is approximately 630 sqm, which means at least 30% of the lot needs to be set aside as 'garden area'.
 - i. Without taking other controls into account, such as site coverage or setback requirements, only 440 sqm of the median site will potentially be available for development (noting that a driveway will also need to be provided).

¹ This mandatory maximum height limit nominated in Schedule 3 to the RGZ is inconsistent with the standard 13.5 metre maximum height in the head provision. It is understood that regardless of the outcome of Amendment C375, this inconsistency will likely be addressed as part of a review of zone/schedule inconsistencies to be undertaken by DELWP and councils.

- ii. Interestingly, VC142 introduced the ability for councils to switch off the garden area requirement in schedules to the GRZ, but it is noted that Council has opted not to pursue this option.
10. The development capacity of lots rezoned south of Bridge Road is even further reduced through the application of the NRZ6. 215 lots will have their capacity reduced through the following changes:
 - a. A mandatory maximum 9 metre building height limit and a mandatory cap of two storeys will apply to new residential development.
 - b. The application of mandatory minimum garden area requirement to all lots of 400 sqm and above.
 - c. A private open space provision requirement of 60 sqm, including a minimum 40 sqm 'secluded private open space' area.
 11. With the exception of properties in Warrenbeen Court, all current GRZ2 land is to be rezoned to NRZ6. This change to 1,698 lots will substantially reduce development capacity across the township, via the following controls:
 - a. A zone purpose that no longer seeks to 'encourage a diversity of housing types and housing growth particularly in locations offering good access to services and transport' (GRZ purpose) and instead only seeks to 'recognise areas of predominantly single and double storey residential development'.
 - b. A mandatory maximum 9 metre building height limit and a mandatory cap of two storeys will apply to new residential development.
 - c. A private open space provision requirement of 60 sqm, including a minimum 40 sqm 'secluded private open space' area.

Overlay impacts on development capacity

12. Schedule 41 to the Design and Development Overlay (DDO41) is proposed to apply across most of the township (1,634 lots and the majority of land zoned NRZ6), further reducing Barwon Heads' capacity to accommodate infill growth.
13. Schedule 41 contains the following design requirements that constrain development:
 - a. A maximum site coverage of 40% for buildings and works.
 - b. At least 30% of the site to be available (free from hard surfaces) for soft landscaping (e.g. vegetation). This requirement is different to the minimum garden area requirement, which is also proposed to apply to all residentially zoned land in the township.
14. It is also noted that a Special Building Overlay will continue to apply across much of the township, affecting 873 lots.
 - a. The main purpose of the SBO is to identify land subject to inundation by overland flows and to ensure that development maintains the free passage and temporary storage of floodwaters and minimises flood damage.
 - b. Arguably, the development capacity of lots that are at risk of inundation is diminished. This is therefore another barrier to the incremental change that is sought by Council over the coming decades.

Lack of justification for reduction in capacity

15. While it is accepted that Barwon Heads is not designated as a 'growth area' it is still expected that it will accommodate an 'incremental' or 'moderate' level of residential development in the coming years. A range of policy documents support this point:
 - a. The G21 Regional Growth Plan (April 2013), which identifies Barwon Heads for incremental infill.
 - b. The City of Greater Geelong Draft Settlement Strategy (May 2018), which includes a Housing Framework Plan that identifies Barwon Heads for 'limited housing growth'.

- i. While the township is not a designated 'growth area', there is a recognition that the Peninsula's townships have been a major source of new housing in the municipality over the last 5 years.
 - ii. The Strategy also states that 'over the last 10 years, the share of new housing built on the Bellarine has been approximately 35-37 per cent of all new dwellings, despite only accounting for 27 per cent of all housing stock' (p. 48).
 - iii. The Strategy recognises that continuing strong population growth forecasts for the Bellarine may increase pressure for more development within townships like Barwon Heads and subsequently the expansion of township boundaries.
- c. The Residential and Landscape Character Assessment (Hansen Partnership, March 2017), completed to inform the development of the Structure Plan, recognises that 'planning policy expectations for the existing established areas of Barwon Heads are for a "moderate" degree of new residential development, which respects the existing character of the town' (p. 34).
 - d. The Barwon Heads Structure Plan (August 2017) notes that while Barwon Heads is not a designated growth location for residential growth, it will nevertheless undergo modest growth, which will be limited to identified structure plan settlement boundaries.
 - e. Clause 21.14 of the Greater Geelong Planning Scheme (Municipal Strategic Statement) includes a strategy for ensuring that new housing in Barwon Heads complements the character of the township and provides for a variety of housing types and sizes.
 - f. Clause 22.63 of the Greater Geelong Planning Scheme, which provides the policy basis for the municipality's Increased Housing Diversity Areas (IHDAs). The Barwon Heads IDHA was originally applied because it was recognised that the area around its activity centre had 'significant capacity to accommodate residential growth'.
16. The documentation prepared by Council in support of Amendment C375 does not adequately address how a moderate level of growth can be accommodated by the township if the proposed planning provision changes are approved.
- a. The Structure Plan concedes that most new dwellings will need to be via infill development as there is very little greenfield land in the township, yet the development capacity of this infill land will be curtailed through the zone and overlay changes proposed by the Amendment.
17. Council, through the BHSP, is seeking to encourage the development of a diverse range of dwellings that will cater for Barwon Heads' future population. Providing appropriate housing for the township's ageing population is specifically referenced as an ambition (in line with state policy).
18. If encouraging a more intensive level of infill development is not supported by Council – as demonstrated by the proposed changes to planning controls – the only way to realistically provide a range of new homes in the immediate area is to allow for an expansion of the township boundary.



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