

8 August 2019



6 Parliament Place
East Melbourne
VIC 3002

Ms Mia Davison
Director
Bass Coast Distinctive Area and Landscape Project
Department of Environment, Land, Water and Planning
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Re: Distinctive Areas and Landscape Program—Bass Coast

Dear Ms Davison,

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

Background

The National Trust is the state's largest community-based heritage advocacy organisation actively working towards conserving and protecting our heritage for future generations to enjoy. The Bass Coast Branch is the premier advocate for heritage conservation in the region.

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

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

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

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

National Trust Classified Landscapes

The National Trust of Australia (Victoria) maintains a Heritage Register of Significant Places, including buildings, landscapes and trees, including the following 14 landscapes in the Bass Coast region. The Classification Reports for these significant landscapes are appended to this submission.

While many of these Classification reports have not been reviewed since they were prepared some years ago, they nevertheless document significant landscape values in the region which should be taken into account as part of this project. We maintain files on each of these landscapes, and would be pleased to facilitate access for the project team.

- L10088 Churchill Island and Swan Bay (State)
- L10250 Bunerong Coastline (State)
- L10034 Bass Hill (Regional)
- L10035 Bass River Delta and Floodplain (Regional)
- L10036 Bass River Valley (Regional)
- L10037 Bass Strait Coastline (State)
- L10041 Cape Woolamai (Regional)
- L10053 Gorge Creek (Local)
- L10069 The Nit (Regional)
- L10075 Powlett River Mouth and Estuary (Regional)
- L10076 Phillip Island Southern Coastline (National)
- L10079 Red Bluff to Stockyard Point (Local)
- L10082 San Remo to Black Head (Regional)
- L10083 Settlement Point (Regional)

Relevant Planning Issues

The National Trust believes the following should be considered in the development of a Statement of Planning Policy for the Bass Coast.

1. Settlement Boundaries

We strongly support permanent designated township boundaries to guide urban development and protect coastal and landscape values between settlements.

Height and density limits within those township boundaries are also a key to protecting the character of the townships, including heritage, architectural and vegetation character.

We note that the Bass Coast Planning Scheme presently includes a clear strategic framework and settlement strategy of High Growth, Moderate Growth and Low Growth Settlements set out under Clauses 21.07, 21.08 and 21.09 of the planning scheme.

We also note that the new legislation requires that a Statement of Planning Policy set a vision for at least 50 years that includes preferences for future land use, protection and development. We question whether this may involve projecting additional population growth and development that may be in conflict with the present settlement polices in the Bass Coast Planning Scheme.

Having regard to the above, we believe it is important to clarify how the Statement of Planning Policy will interact with Council's planning scheme and ensure a clear and consistent planning regime remains in place—and the appearance of duplication and overlap is avoided.

In regard to settlement boundaries, we are also not convinced that the identification of “Investigation Areas” on the periphery of townships is an appropriate way to defer decisions on the possible future expansion of such settlements. We believe this can only lead to further planning uncertainty, land speculation and pre-empts future rezoning, when this current process should be aimed at fixing settlement boundaries.

2. Strengthen Local Overlays—Landscape, Environmental and Vegetation Overlays

The character and appeal of the Bass Coast is very much related to the natural breaks that occur between the various settlements.

Council’s rural land use policies combined with a range of significant landscape, vegetation protection and environmental significance overlays are crucial to maintaining the distinctive landscapes and environment of the Bass Coast.

We believe these planning overlays do not always work effectively together in responding to the pressures for development outside the settlement boundaries.

Through the present process it would be appropriate to refresh existing policies and objectives to provide more clarity and clearer direction and management for non-urban areas.

We would also request that the National Trust Classified Landscapes within the area, as detailed above, be recognised and supported by the new legislation.

3. Heritage

The Bass Coast Branch of the National Trust has had productive discussion with the Bass Coast Shire regarding gaps in heritage protection across the shire.

The Council is intending to undertake a Heritage Gap Study and we expect this will cover built heritage as well as significant vegetation.

We understand the present process will involve consultation with Traditional Owner groups.

Indigenous history is a strong feature of the Bass Coast landscapes and we welcome further detailed assessment of historic and cultural values and recognition within the Statement of Planning Policy.

4. French Island

The topography, landscape, vegetation and heritage of French Island is a significant feature of Western Port and has clear historical, physical and cultural links with Phillip Island, Churchill Island and the Bass Coast.

Furthermore, the Ramsar site and wetlands that surround French Island are inextricably linked to the Bass Coast, especially in the eastern part of Western Port.

Maritime and industrial activities should therefore be limited to avoid adverse impacts to the ecosystems of these areas.

Much of the coastline of Phillip Island is also recognised as being of state significance (including the southern and western stretch from Cape Woolamai to Ventnor) while French Island and Churchill Island have regional significance and many hectares of state significant coastal parkland.

We therefore believe it is important that the proposed declaration and Statement of Planning Policy, as a new regional planning instrument, includes French Island within this planning context.

We note that other proposed 'Declared Areas' include more than one municipality to enable a regional focus that is not encumbered by a municipal boundary. Furthermore, the earlier Statements of Planning Policy prepared by the government in the 1970s also typically covered more than one municipality across a region.

5. Distinctive Landscapes and Tourism

The marine environment of Western Port and Bass Strait and the coastline beaches and distinctive landscapes of the Bass Coast are sensitive to the impact of high population growth and seasonal visitor numbers.

An important measure of the new Statement of Planning Policy should be to strike the appropriate balance between tourism/development and environmental values and ensure that future measures such as road duplications, car ferries, siting of industrial facilities and infrastructure are carefully considered against sound strategic policy objectives.

This should be strongly weighted in favour of protecting the natural beauty, flora and fauna and landscape significance of the area and respecting heritage and cultural values for the benefit of future generations.

6. Marine and Coastal Park

The recent announcement by the government to create a state park along the Kilcunda–Inverloch coastline is an important initiative that further reinforces the significance of this area for its scenic qualities, recreational value and Indigenous heritage and cultural significance.

We believe the Statement of Planning Policy should carefully integrate this initiative in the policies and objectives put forward.

Conclusion

In conclusion, the National Trust, including our Bass Coast Branch, strongly supports the declaration of the Bass Coast as a Distinctive Area and Landscape.

We hope the issues raised above will be considered during the next stage of the process, and look forward to further opportunities to provide feedback as this process progresses.

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

Yours faithfully,



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