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29 July 2016

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Dear Team

**Re: Moolap Coastal Strategic Framework Plan Discussion Paper**

The Victorian National Parks Association, the state's leading nature conservation organisation, welcomes the opportunity to comment on the Moolap Coastal Strategic Framework Plan Discussion Paper.

In recent years we have maintained a close interest in the future of the internationally significant Moolap coastal wetlands at the former Cheetham Saltworks, and continue to support calls for their protection. The current planning process has also allowed us to consider the future planning, management and use of Point Henry and the Moolap coastal area more broadly, including the nearshore waters.

This submission analyses the broad sweep of the seven future land use scenarios presented in the discussion paper in the context of our earlier submission to the planning process in February of this year. The VNPA vision for Moolap presented in that submission was as:

An internationally important conservation and ecotourism area on Geelong's doorstep that protects migratory birds, improves the health of Corio Bay, reconnects people with nature and supports ecologically sustainable coastal land use.

The VNPA maintains this vision and our comments about individual scenarios, including the one we favour, Conserving Moolap, are anchored to it.

In making this submission we also wish to give our support to those submissions being made by the Geelong Environment Council, Geelong Field Naturalists and Birdlife Australia.

Yours faithfully

Chris Smyth  
Project manager  
Victorian National Parks Association

# Moolap Coastal Strategic Framework Plan Discussion Paper



**Submission by the Victorian  
National Parks Association**

29 July 2016

## Introduction

The Victorian National Parks Association, the state's leading nature conservation organisation, welcomes the opportunity to comment on the Moolap Coastal Strategic Framework Plan Discussion Paper.

In recent years we have maintained a close interest in the future of the internationally significant Moolap coastal wetlands at the former Cheetham Saltworks, and continue to support calls for their protection. The current planning process has also allowed us to consider the future planning, management and use of the Point Henry coastal area more broadly, including its nearshore waters.

The discussion and background papers have provided useful information for preparing this submission, while the case studies demonstrate that governments and their communities can implement ambitious and large-scale projects that protect wetland and coastal environments in areas with urban and industrial histories. Political will and commitment, imagination, resourcing and community support are critical to their success.

Through the use of seven scenarios, the discussion paper provides diverse options for the planning, protection, management and future use of the Moolap Planning Area. This submission analyses the broad sweep of the seven scenarios in the context of our earlier submission to the planning process in February of this year. The VNPA vision for Moolap presented in that submission was as:

An internationally important conservation and ecotourism area on Geelong's doorstep that protects migratory birds, improves the health of Corio Bay, reconnects people with nature and supports ecologically sustainable coastal land use.

The VNPA maintains this vision and our comments about individual scenarios, including the one we generally favour, Conserving Moolap, are anchored to it.

If Victoria can get the planning right at Moolap, the area will serve as:

- an environmental corridor and link along the Corio Bay foreshore and between central Geelong and the Bellarine Peninsula
- a buffer between coast and residential areas while providing protection for important biodiversity values
- a catalyst for longer-term and larger landscape-scale restoration across the Bellarine Peninsula and around Corio Bay.

## Key points from the VNPA's February 2016 submission

The VNPA's February 2016 submission considered a variety of planning, management, conservation and land use outcomes for the 1250 ha Moolap Planning Area, which includes the Moolap coastal wetlands (former Cheetham Saltworks), the Alcoa aluminium smelter, other land zoned industrial and rural, and the foreshore and nearshore waters out to 600 metres.

The key points made in that VNPA submission were:

- The closure of Alcoa's Point Henry operation, the uncertainty over the long-term future of the former Cheetham Saltworks, and the ongoing debate about the needs of a growing Geelong, have provided a rare opportunity to carefully consider the future of this significant marine and coastal area on the western shoreline of Port Phillip Bay
- The Moolap salt fields and Ramsar wetlands along Port Phillip Bay and the Bellarine Peninsula are home to tens of thousands of birds each summer, providing a vital habitat for species that have migrated there from as far as Siberia and the Arctic

- One of the largest areas of seagrass in Port Phillip Bay adjoins the shoreline of the Moolap Planning Area, while a significant remnant of Port Phillip Bay's severely diminished area of Coastal Saltmarsh grows on the former Cheetham Saltworks site (since European settlement close to half of the coastal wetlands along Port Phillip Bay's western shoreline have been removed)
- Marine and coastal ecosystems, including the Coastal Saltmarsh and seagrass meadows in the Moolap Planning Area, provide a number of ecosystem services to the community. These include fish nurseries by the seagrass meadows, and shoreline protection and blue carbon storage by both; they should be assessed and factored into coastal planning decision-making processes
- Planning authorities highly value the natural and cultural heritage values of the Moolap Planning Area, and for many years they have worked to protect those values. Development that removes and degrades the area's environmental and cultural values, and also removes the break between the urban and rural area, would turn these planning strategies on their head
- The various existing threats to the natural and cultural values of the Moolap Planning Area include vegetation loss and fragmentation, weed invasion, feral animals, hunting, fishing, feral animals, climate change, stormwater discharge, groundwater seepage, uncontrolled vehicular access and absent management of water levels in the former Cheetham Saltworks
- Canal estates, like the Nelson Cove proposal by the Ridley Corporation, have many environmental, social and economic impacts associated with their construction and use; interstate, and for a time in Victoria, they were banned in coastal planning. Victoria must again ban them
- Population growth and urbanisation are becoming major issues in the City of Greater Geelong. The challenge for authorities in planning for growth is to take the opportunity to drive protection and recovery of the coast and hinterland's natural values. Housing should be developed in less sensitive areas that can deal with future housing demand—the urban growth areas of Armstrong's Creek and Lovely Banks are designed for that very purpose and will satisfy housing demand for decades to come
- A Moolap Coastal Park would ensure that the wetlands and foreshore reserve in the Moolap Planning Area are protected and conserved at a time of high population growth and climate uncertainty. This would ensure that they continue to supply habitat to the thousands of migratory waders that make their remarkable journey here each summer, and provide new opportunities for community recreation, education and enjoyment
- Every great city has a great park; the Moolap Coastal Park could be Geelong's.

VNPA also submitted that a future plan for the Moolap Planning Area should include:

- Integrated marine and coastal management in the area and with other wetlands on the Bellarine Peninsula
- Improved management of water levels in the former Cheetham Saltworks
- Expansion of the Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar site to include Moolap and Avalon saltworks
- Widening of the Crown Land area around Point Henry to at least 200 metres
- Realignment of roads inland from the shoreline
- Evaluation and protection of blue carbon storage and ecosystem services
- Minimisation of the industrial footprint
- Removal of contaminants
- Improved stormwater management
- Dismantlement of the Point Henry Pier: no cruise ship or dry bulk cargo terminals
- No marina
- Retention of the green break between Moolap and Leopold

- Retrofitting of the Moolap Industrial Estate to include water sensitive design and stormwater harvesting
- Biolinks across Point Henry and between the former Cheetham Saltworks and Reedy Lake
- Removal of the high-voltage transmission line and undergrounding or realignment of other power line away from the foreshore.

## Comments on the seven scenarios

This submission considers each of the seven scenarios separately (in the order they appear in the discussion paper) and then concludes with a summary of key points. We acknowledge the following general points about the department's preparation of the scenarios:

- they contain very broad-brush zonings with no on-ground detail (other than a brief description and photos of the general nature of the zone i.e. they are not prescriptive)
- they have been prepared without consideration of existing planning strategies that apply to the Moolap Planning Area
- they have been prepared without any feasibility analysis carried out for the proposed zones within each of them (although the discussion paper on page 5 indicates that 'Site Constraints' were considered during the research phase of preparing the land use scenario proposals).

Clearly, in the next phase of the plan's preparation these limitations will need to be addressed, especially with regards to the objectives of existing planning strategies at the Geelong and state levels, to the potential for conflict between various uses and to the economic, environmental and social feasibility of any proposals.

Further, the scenarios:

- reflect the diversity of ideas put forward by the community in the most recent consultation process
- will be used to provide opportunities for further community comment on the future of the Moolap Planning Area and then considered in the preparation of the draft indicative strategic framework plan for the area, the implementation of which will fall to the City of Greater Geelong through statutory planning processes under its planning scheme.

Although these points emphasise the generality of the seven scenarios, this submission will, for some scenario zonings, consider their potential on-ground impacts.

# Scenario 1: Business as Usual in Moolap

BUSINESS AS USUAL IN MOOLAP

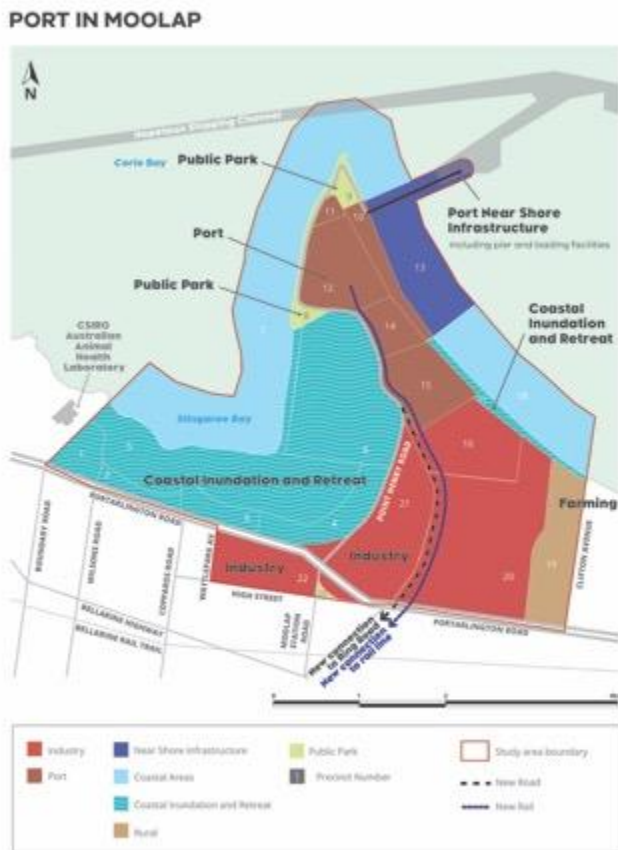


## VNPA comments

The implementation of Scenario 1, that is do nothing, would sacrifice the immense opportunities that the Moolap Planning Area provides for conservation, recreation and tourism. 'Business as usual' is not business at all, as the Special Use Zone is no longer used for salt production, the Alcoa smelter has closed, and the pier is largely in disuse. To allow land use and land management to remain as they are would mean that there would be no progress in dealing with:

- land contamination and waste stabilisation ponds
- the need to improve public access along the Point Henry foreshore
- the establishment of biolinks across the planning area
- integrated marine and coastal zone management
- re-establishing the management of water levels in the former Cheetham Saltworks to enhance this habitat for threatened migratory and local bird species
- weeds and pest animals, vegetation loss and fragmentation, hunting, fishing, climate change, stormwater discharge, groundwater seepage, uncontrolled vehicular access
- softening the amenity impact of the industrial area east of the Point Henry Road
- the impact of the power transmission lines on coastal views
- land to the high water mark being privately owned and restricting public access
- implementation of the planning strategies that have indicated the need to protect the wetlands, improve management of the Point Henry foreshore reserve, maintain a rural/urban buffer zone, improve the health of Corio Bay, including its seagrass meadows, and improve community access.

## Scenario 2: Port in Moolap



### VNPA comments

The VNPA believes that the establishment of a bulk-loading port at Moolap, under Scenario 2, would undermine the opportunity to de-industrialise this part of Geelong (the city is more broadly going through a phasedown of heavy industry) and to improve conservation and recreational outcomes.

A port established in the Moolap planning under Scenario 2 would:

- occupy all of precincts 10-15 with an exclusive use
- lead to an intensification of industrial use in precincts 16 and 20
- provide only two tiny areas of Public Park—precincts 8 and 9—underlining the removal of public access to the coast under this scenario (the potential for providing public access along the eastern side of Point Henry in precincts 10, 15 and 20 would evaporate)
- require significant, ongoing and impactful dredging, especially affecting seagrass meadows and the sand flows along the shoreline. In precinct 13 the seagrass meadows would be removed
- require new road and rail infrastructure that would create a sharp divide and barrier between the western and eastern sides of the planning area, along with creating serious traffic and amenity issues.

Other concerns with Scenario 2 include:

- the use of Precincts 14 and 15 for port development would destroy the salt pans and wetlands on the eastern side of Point Henry. These areas should be rehabilitated and more formally linked with the salt pans and wetlands of the former Cheetham Saltworks (see our comments on Scenario 7)

- the rezoning of a large area of the Rural Zone to Industrial Zone effectively removing the buffer between Geelong's urban/industrial areas here and the adjoining rural areas
- the Coastal Inundation and Retreat Zone covering precincts 1-6 requiring the removal of the heritage wall used in the operations of the former Cheetham Saltworks and the flooding of the area now used by migratory birds. It would also relocate the shoreline up against the Portarlington Road, thus necessitating substantial and expensive walling to protect the road from sea level rise
- the lack of information about how the stormwater that currently flows through the former saltworks site would be managed as part of the inundation area.

The VNPA also notes:

- the proposal for a Coastal Inundation and Retreat Zone on the eastern side of Point Henry has presumably taken into consideration the presence of Dow Chemical's waste stabilisation pond (which should be removed) on the edge of the foreshore. Is this zoning simply accepting that inundation will occur here, which is in large part due to the ongoing erosion caused by the existing and proposed infrastructure and the maintenance dredging in the Hopetoun Channel?
- any consideration of port development should not be conducted in isolation from the operational port infrastructure that exists in GeelongPort, the Port of Melbourne, Port of Hastings, along with the proposed Bay West site, and the Infrastructure Victoria review of sites for a new container port
- the nearshore waters and their seagrass meadows—precincts 7 and 20—have been ignored in Scenario 2, with no zoning ascribed to them. A similar note will appear when commenting on other scenarios in the pages that follow. If Scenario 2 were implemented, there would be the loss of seagrass meadows in precinct 13. This would need to be balanced with greater protection for the remaining seagrass meadows in the Moolap Planning Area
- the VNPA's February submission recommended that the existing pier be dismantled and that there be no recreational boating infrastructure established. This would ensure that the area would be open to a broader range of recreational activities for a larger number of people
- the rezoned land in precincts 11 and 12 maintain the very narrow strip of public land on the western side of Point Henry. This also features in some other scenarios. In any rezoning there should be provision for a wider public land reserve on this stretch of coastline by way of the open space provision under the local government planning scheme. In this particular case, realignment of the Point Henry Road that abuts precincts 11 and 12 would also provide greater opportunity for improved recreational access.



## Scenario 3: Marine Industry in Moolap

MARINE INDUSTRY IN MOOLAP



### VNPA comments

Many of the comments made about Scenario 2 apply to this scenario in relation to port development and the exclusive use of precincts 10-14, which removes the potential for community access to precinct 10. But that is where the similarity between this and Scenario 2 ends.

In Scenario 3 the Coastal Inundation and Retreat Zone is replaced by a Public Park Zone, the Industrial Zone east of Point Henry Road by a Residential Zone, and the larger Rural Zone replaced by a smaller Farmland Zone (this zone is not described in the discussion paper and is confusing). Two small Wetland/Retarding Basin zones are included, along with a Research Zone in the far western corner of the planning area. Bike trails are also a major feature of Scenario 3.

There are a number of concerns that the VNPA has with Scenario 3. These include:

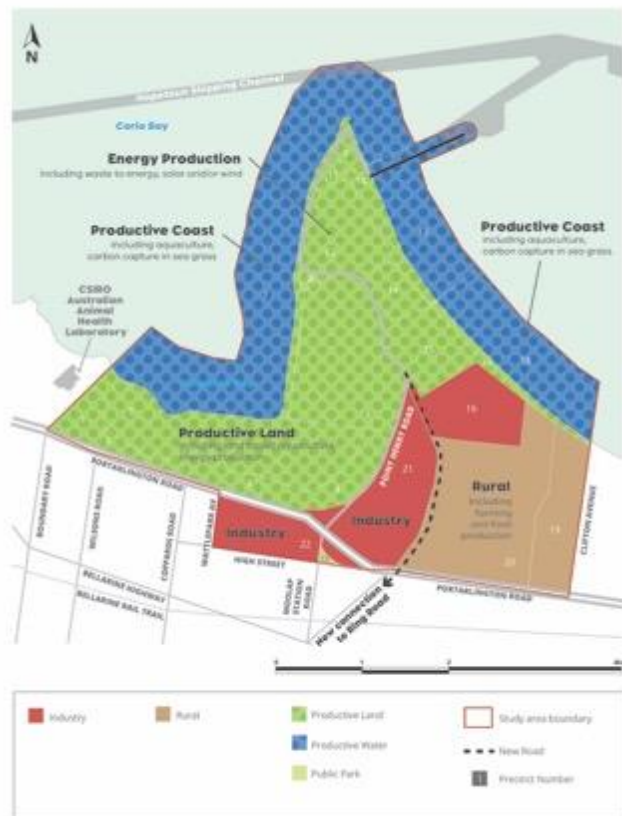
- the loss of the former Cheetham Saltworks wetlands due to the construction of a public park (includes recreational facilities, carpark and toilet facilities, walking paths and sporting facilities such as an oval, field or rowing course). The immense conservation and recreational value of these wetlands have been described elsewhere in this submission and in the VNPA's February 2016 submission
- the substantial reduction of the urban/rural buffer zone by the rezoning of the existing Rural Zone to Residential Zone. We would question the economic viability of the farming operation remaining in the Farmland Zone
- the close proximity of the Residential Zone to the shoreline along the eastern side of Point Henry. This is inconsistent with the Victorian coastal strategy which states that linear coastal development should be avoided, that urban/town boundaries should be

defined and maintained (the City of Greater Geelong has already considered the boundary in this area and this extension under Scenario 3 would be inconsistent with that (see our February 2016 submission)), and that coastal development should be within the boundaries of existing settlements

- the route of the bike trail lacks imagination and would hinder public access by creating a barrier between the land and the water, as well as taking up a large part of the very narrow public land on the western and eastern sides of Point Henry. This route suffers from the same problems that coast roads do and why they are inconsistent with good coastal planning and to be avoided under the Victorian coastal strategy. It would be better for the Pedestrian/bike path to meander through the area, occasionally coming to viewpoints along the coast
- locating a Research Zone adjacent to the existing animal health laboratory would only make sense if the research being carried out in the zone was of relevance to that facility
- the extensive wetlands of the area are reduced to two tiny Wetlands/Retarding Basin zones in precincts 3 and 15. It is simply unacceptable when the significance of the existing wetlands are considered. And because this zone serves two purposes that are not necessarily compatible, which one will have priority?

## Scenario 4: Production in Moolap

### PRODUCTION IN MOOLAP



### VNPA comments

Scenario 4 makes nothing of the immense conservation and recreational opportunities that the Moolap Planning Area presents for Geelong. Based on the broad-brush zoning compared to the other scenarios, and the suggested uses, little thought appears to have been given to this scenario and its implications.

Although the Rural Zone is retained, and the Industry Zone extended into precinct 16, the rest of the area is given over to Productive Land, Productive Coast and Energy Production zones. Due to the zone colours, it is not possible to determine where Productive Land and Energy Production zones begin and end, although the assumption in this submission is that the boundary for the Energy Production Zone is the former Alcoa smelter area located in precincts 10-12.

The only public access in Scenario 4 is the retention of the existing Public Park Zone in precinct 23, a tiny area on the corner of High Street and the Portarlington Road. All wetland areas would be removed and there would be no foreshore reserve, with all public land transferred to freehold and used for commercial use.

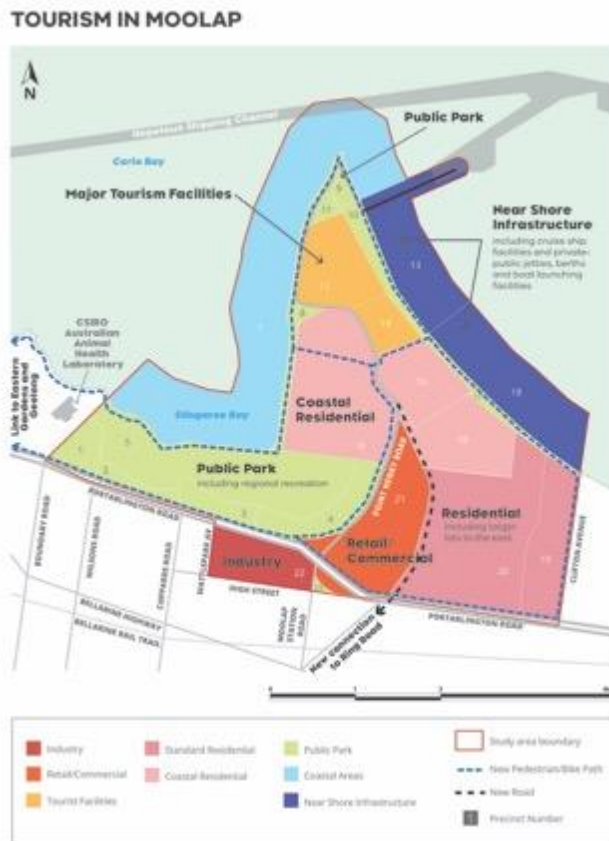
However, it is the only scenario that takes an interest in all of the nearshore water precincts 7, 13 and 18. Unfortunately it is very much in the wrong way. There appears to be a misguided assumption implicit in the Productive Coast zoning that aquaculture and the protection of seagrass meadows for blue carbon storage are compatible. The wastes generated by aquaculture, and the shading of seagrass meadows by the aquaculture operation, are two impacts that aquaculture could have on the seagrass meadows. Giving over a large area of nearshore waters to aquaculture also excludes other water-based users and there is the risk of disease outbreaks, which this week has been reported for native oyster aquaculture in Port Phillip Bay.

The VNPA supports the protection of the seagrass meadows in the Moolap Planning Area, not just for their blue carbon storage potential but for the other ecosystem services they provide to the community, including as a fish nursery. Including blue carbon storage in a Productive Coast zone is misleading. Yes, the seagrass meadows 'produce' carbon storage, but that occurs by ensuring they continue to store carbon in the mud beneath them. The only human intervention should be to ensure the health of the seagrass meadows by removing or reducing the threats to them, such as port development and dredging, stormwater discharges, anchoring, motorised craft and aquaculture. And the photo of people handling seagrass on page 21 of the discussion paper suggests that they might be harvesting the seagrass!

Covering Point Henry in wind turbines, which is implied by the Energy Production Zone, would simply exacerbate or replace the amenity impact of the existing high voltage transmission lines. Were some of the Alcoa smelter buildings retained, possibly for industrial heritage conservation purposes (see our comments on Scenario 7), then the roofs of these buildings could be used for solar power generation. Solar farms could also be established over the contaminated land.

In Scenario 4 the pier is maintained but there is no clarity as to why. It would appear to have no use within Scenario 4.

## Scenario 5: Tourism in Moolap



### VNPA comments

It is odd that Scenario 5 Tourism in Moolap is largely comprised of residential development, retail and industry zones and a public park. The only precincts included in the Major Tourist Facilities Zone are 12 and 14, the site of the Alcoa smelter. The Major Tourist Facilities Zone could include ‘a large entertainment/cultural venue, hotel or theme park and supporting cafes and restaurants’.

Oddly, the discussion paper also states that in the major Tourist Facilities Zone: ‘Other options could include a public educational or interpretive centre focusing on the area’s environmental, cultural and heritage values’. But these values would be removed under Scenario 5. The wetlands of the former Cheetham Saltworks would be buried under a public park and coastal residential development, the Moolappio restoration area under residential use, and the seagrass meadows on the eastern side of Point Henry (precincts 13 and 18) would be destroyed by marina and cruise ship infrastructure and dredging. Finally, a poorly aligned Pedestrian/bike path would occupy the very narrow strip of public land retained around Point Henry.

It is disturbing that that the discussion paper coins the term ‘Coastal Residential Zone’ in Scenario 5. Based on the description of this zone—‘Coastal residential areas capitalise on the waterfront location and benefit from a connection to the water both to the east and west of Point Henry. Coastal residential development could provide diversity of housing and include medium rise development and short-stay accommodation’—this is simply a canal estate development and the photos accompanying the description on page 20 bear this out.

The VNPA’s February 2016 submission detailed our concerns and views about canal estate developments, which are consistent with previous Victorian coastal strategies and those of interstate

planning authorities, that canal estates should be prohibited in Victoria because of their many environmental, social and economic impacts.

Further, implementation of Scenario 5 would:

- entrench linear coastal development, which is inconsistent with the Victorian coastal strategy
- remove the urban/rural buffer zone and take Geelong's urban growth beyond its existing town boundary, which is also inconsistent with the Victorian coastal strategy
- establish a cruise ship terminal when cruise ships largely go to Station Pier (a small number come to Geelong but an alternative cruise ship terminal has been proposed for central Geelong)
- the Nearshore Infrastructure Zone and the cruise ship terminal would require extensive dredging and further damage the environments of the nearshore coastal waters.

Scenario 5 is simply an example of 'cookie cutter' coastal development and would become just another suburb of Geelong. Victoria can do much better.

## Scenario 6: Living in Moolap

### LIVING IN MOOLAP



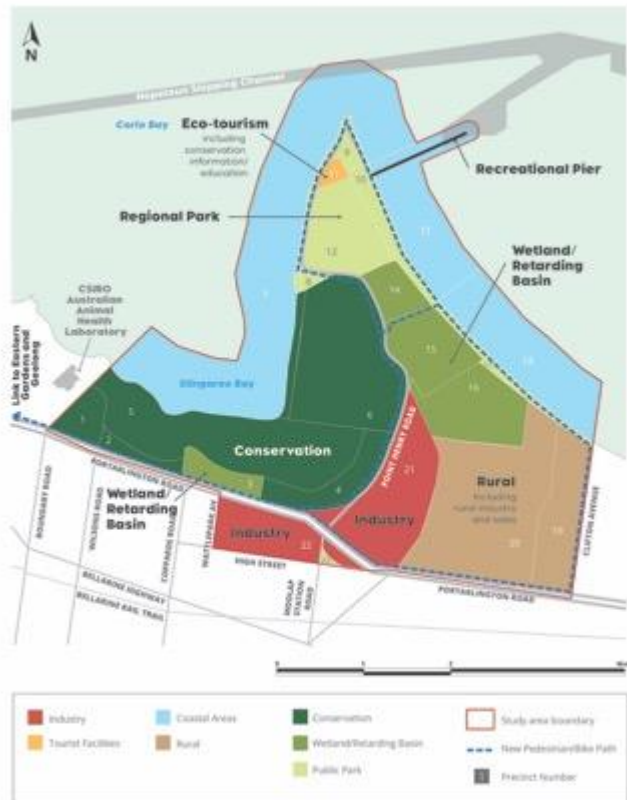
### VNPA comments

Although Scenario 6 includes a large Conservation Zone in precincts 5 and 6, this is seriously undermined by the linear residential development occupying precincts 2-4. The other concerns the VNPA has with this scenario are the:

- loss of seagrass meadows in precinct 13 due to the Near Shore Infrastructure Zone. Use of this zone would also likely have a downstream impact on the seagrass in precinct 18
- loss of salt pans in precinct 14 and 15 due to the development of a public park
- close proximity to the coast of the Residential Zone in precincts 12, 20 and 19
- unimaginative alignment of the Pedestrian/bike path (see comments for other scenarios with such paths)
- lack of clarity regarding the pier
- loss of the rural/urban buffer zone and the extension of Geelong's urban boundary
- residential development restricting public access to the foreshore in precincts 9 and 20 and 12, overshadowing the Conservation Zone and putting pressure on the values of that Conservation Zone e.g. weeds, feral animals, rubbish, stormwater. This residential area would likely require protection from sea level rise. Putting such infrastructure in harm's way is inconsistent with good coastal planning
- exclusive use of precinct 13 for boating interests
- no effort to provide meaningful protection for seagrass meadows in precincts 7 and 18 (this is a common failing of the scenarios).

## Scenario 7: Conserving Moolap

### CONSERVING MOOLAP



### VNPA comments

With some exceptions, the VNPA generally supports Scenario 7, which largely retains the existing rural and industry zones (see Scenario 1), but not the zoning of the Alcoa precinct, and rezones the Special Use Zone as Conservation.

The VNPA believes that:

- the Conservation Zone provides the necessary protection for the wetlands in precincts 1, 2 4,5 and 6. The Wetland/Retarding Basin Zone in precinct 3 may serve a useful purpose with regards to stormwater in the Industry Zone of precinct 22 but we would need to see more information on its worth in that regard. Otherwise, it should be included in the Conservation Zone as part of a rehabilitation project. The Conservation Zone should also replace the Public Park Zone along the foreshore reserve. This should be widened on the western and eastern side of Point Henry, emphasising the fragility and conservation values of the foreshore
- the major failing of Scenario 7 is that it ignores the need to conserve the nearshore waters and their seagrass meadows in precincts 7, 13 and 18. In this regard, the Conservation Zone should be extended to these precincts and the necessary regulations put in place to protect these waters
- the retention of the Rural Zone in precincts 19 and 20 would maintain the existing buffer between urban Geelong and the adjoining rural area
- the retention of the Industry Zone in precincts 21 and 22 should coincide with a review of the uses allowed within the zone—the large blocks associated with each business have not encouraged landscaping and the general amenity of the area has suffered. At the same time, a collaborative government, industry and community project should be



established to improve the zone's amenity, to reduce its visual impact on the surrounding area, especially the views from the wetlands and Point Henry Road, and to establish biolinks through it to connect various areas in the Moolap Planning Area

- the Industry Zone in precinct 22 requires retrofitting with water sensitive design to minimise the impacts of stormwater on Corio Bay
- the Regional Park Zone replaces the existing Industry Zone and the Point Henry foreshore reserve. Although a regional park is mentioned in the description of this zone, it is unclear whether it has the same features as the Public Park Zone or has a different emphasis. The use of this term is also confusing as it is unlikely to have any resemblance to a 'regional park' under the National Parks Act. The VNPA could see the proposed regional park including the retention of some Alcoa buildings for industrial heritage interpretation and as research facilities, with the building rooves used as solar power generators. Stormwater from those rooves could be stored and used in any rehabilitation and garden projects in the regional park
- routing of the Pedestrian/bike path close to the foreshore lacks imagination and will hinder access by the general public to foreshore areas because of a wide concrete path with fast-moving bicycles (as mentioned in our commentary on the other scenarios). A better route would wind through the area rather than hug the foreshore and take loops to key points of interest on the foreshore
- the Ecotourism Zone is simply a visitor information/education area, which is only one small part in the concept of ecotourism, so this zone is poorly named. If it is to be truly ecotourism, it should be about actively engaging people in activities in the Moolap Planning Area that bring them closer to nature in an ecological sustainable way. In this regard, there could be an argument for accommodation facilities (with a focus on their ecological sustainability) for those engaged in activities that may involve more than a day visit. Such accommodation could be established on land zoned in this scenario as Regional Park
- the Wetland/Retarding Basin in precincts 14 and 15 should be linked to the Conservation Zone to allow water to pass between them. It is unclear what water the retarding basin would be retarding in these two precincts. Would it be overflow from the Conservation Zone? This zone in precinct 3 appears superfluous when surrounded by wetlands. But there needs to be a 21st century solution to the issues of stormwater emanating from the industrial area south of Portarlinton Road. It is also unclear how precinct 16 could become a retarding basin as it is on somewhat higher ground
- the Recreational Pier is presumably a new pier, not the existing bulk-loading facility which would be very difficult and expensive to retrofit. As we said in our February submission, the existing pier should be dismantled and the area's shoreline allowed to restabilise and provide greater public access.

# Conclusions

The release of the discussion and background papers and the case studies has been a very useful exercise in community consultation on the Moolap Coastal Strategic Framework Plan; the VNPA has been very happy to be engaged.

This submission has made comments on each of the seven scenarios as well as revisiting the key points of our February 2016 submission, which has far more details on our concerns about various proposed uses, some of which feature within the seven scenarios in the discussion paper.

The VNPA generally supports Scenario 7, with a number of exceptions outlined in our comments on previous pages, and believe that it would provide a sound foundation for the next stage of the planning process and the creation of the strategic framework plan for the Moolap Planning Area.

As we stated in our February 2016 submission, our vision for the Moolap wetlands is as:

An internationally important conservation and ecotourism area on Geelong's doorstep that protects migratory birds, improves the health of Corio Bay, reconnects people with nature and supports ecologically sustainable coastal land use.

That is what we would like to see in the Moolap Planning Area Plan. But there are also features that we would not like to see. These are also detailed in our February 2016 submission and in our comments in this submission and include:

- no canal estate, marina or pier
- no re-industrialisation of Point Henry and the likely major new road, rail and port infrastructure associated with it
- no linear coastal development
- no loss of the rural/urban buffer.

As we said in the introduction to this submission, if Victoria can get the planning right at Moolap, the area will serve as:

- an environmental corridor and link along the Corio Bay foreshore and between central Geelong and the Bellarine Peninsula
- a buffer between coast and residential areas while providing protection for important biodiversity values
- a catalyst for longer-term and larger landscape-scale restoration across the Bellarine Peninsula and around Corio Bay.

Now that would be a plan.