



Submission to the Draft Moolap Coastal Strategic Framework Plan



31 May 2017

1. Introduction

The Victorian National Parks Association (VNPA) welcomes the opportunity to comment on the draft Moolap Coastal Strategic Framework Plan (The Plan) released on 19 April 2017.

VNPA is Victoria's leading community conservation group and has for many years advocated the need for greater coastal nature conservation efforts and improved coastal planning and management in this state. It is within this context that we make this submission, the third of our engagement in the Moolap planning process.

The VNPA vision for Moolap is:

An internationally important conservation and ecotourism area that is benefitting the Victorian community by protecting migratory birds, improving the health of Corio Bay, reconnecting people with nature and supporting ecologically sustainable coastal land use.

If Victoria can get the planning right at Moolap, VNPA believes the Moolap Planning Area can serve as:

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

This submission begins with comments on what VNPA views as key proposals of The Plan and the supporting arguments, followed by commentary on the content of each section from chapters 2-6. The latter analysis is presented in a series of tables containing further comments on The Plan's proposals, as well as on the language, terminology and images used to reflect its objectives and potential outcomes.

In general, and in more specific terms, The Plan is a great disappointment, a lost opportunity to reaffirm the objectives of the 2014 Victorian Coastal Strategy and past and current Geelong planning strategies, and to provide substantive protection for the area's natural and cultural heritage in a great new park for a growing Geelong region.

In making this submission, VNPA acknowledges and supports the submissions by the Geelong Environment Council, the Geelong Field Naturalists Club and Birdlife Australia.

2. Recommendations

Recommendation 1: Create a Nearshore Waters Precinct

- A. That the seagrass meadows (nearshore waters) should be delineated as a separate Nearshore Waters Precinct in the final version of The Plan, with recommendations that focus on their conservation.
- B. That the Coastal Foreshore be excised from the Point Henry, Industrial and South-east precincts and established as a separate precinct or integrated with the Nearshore Waters Precinct.
- C. That a map of the Coastal Foreshore, showing coastal crown land as well as freehold land abutting the high-water mark, be included in the final version of The Plan.

Recommendation 2: Conserve Moolap's wetlands on crown and freehold land in the Saltworks and Wetlands Precinct

- A. That the final Moolap Coastal Strategic Framework Plan recommends that the former Cheetham Saltworks be rezoned from SUZ1 to Public Conservation and Resource Zone.
- B. That the Alcoa owned wetlands component of the Saltworks and Wetlands Precinct be rezoned from Industrial Zone to Public Conservation and Resource Zone.
- C. That in the interim, a management plan be developed for the Saltworks and Wetlands Precinct to, among other things, re-establish effective water level management that enhances the area for resident and migratory birdlife, and enable regular monitoring of birdlife by the Geelong Field Naturalists Club.
- D. That the Victorian Government act to bring an immediate end to the current Ridley Corporation lease over the crown land component of the Saltworks and Wetlands Precinct.

Recommendation 3: No new urban growth area in the Point Henry Precinct

- A. That the final version of The Plan not include a proposal for a new urban growth area at Point Henry.
- B. That the Point Henry Precinct be used for recreational open space, civic, ecotourism and mixed uses at a scale and location appropriate to its sensitive coastscape.

Recommendation 4: Retain the rural-urban buffer in the South-east Precinct

- A. That the South-east Precinct be retained as an urban-rural buffer between the eastern edge of Geelong and the Bellarine Peninsula.
- B. That in cooperation with landowners, the existing vegetation restoration projects in the South-east Precinct be extended to establish wildlife corridors and biolinks across the Moolap Planning Area.

Recommendation 5: Widen and link up the Point Henry Foreshore Reserve

- A. That the widening and extension of the Point Henry Foreshore Reserve be a priority of government in the next five years.
- B. That as part of the reserve's widening process, the Point Henry Road be realigned to the east of the existing reserve boundary.

Recommendation 6: Build a flood-free Point Henry Road

- A. That the design and construction of a flood-free section of the Point Henry Road ensure that wetlands water is allowed to flow beneath it to ensure the maintenance of the wetlands habitats.
- B. That the Point Henry Road be realigned further east of the former Saltworks site as a response to likely sea level rise and to also create a wider buffer between the road and the wetlands.

Recommendation 7: No new boating facilities and marinas in multiple precincts

That there be no provision for new boating facilities, including marinas, in the final version of The Plan, with the more efficient use of existing facilities along the Corio Bay, Bellarine Peninsula and open coast shorelines meeting the future needs of the boating sector.

Recommendation 8: No road connection north of Point Henry

That there be no provision for a potential road connection north beyond the Point Henry peninsula in the final version of The Plan.

Recommendation 9: Design imaginative and low-impact pathways

- A. That walking and cycling be encouraged in the Moolap Planning Area with the imaginative design and location of paths that minimise pressure on the natural and amenity values of the foreshore and wetlands.
- B. That the main paths be located back from the foreshore with feeder paths to key access points.
- C. That freehold land be transferred to the crown to create a wider buffer between the paths and the foreshore.
- D. That separate cycling and walking paths be part of the path network.

3. The Moolap Planning Area

3.1 Landscape and land use

The Moolap Planning Area (see Figure 1) covers approximately 1,200 hectares of significant wetlands, shoreline sand flats and saltmarsh, and industrial, urban, agricultural and recreational land uses. It is situated on the edge of Geelong's urban area, 3-7 kilometres from the city's CBD and stretching along the shoreline of Stingaree and Corio bays, both part of the larger Port Phillip Bay. Some of Port Phillip Bay's largest seagrass meadows border the area's shoreline.

Around 465 hectares of the Moolap Planning Area—on the western side of Point Henry and facing Stingaree Bay—comprise the former industrial site of the Cheetham Saltworks. Of this, 176 hectares is land privately owned by the Ridley Corporation, while 289 hectares is crown land leased by the company. The use of the crown land has been under leases since 1888, with the current one due to expire in 2031.

Point Henry is the site of the recently closed Alcoa aluminium smelter. The company owns 575 hectares of land in the Moolap Planning Area, comprising the smelter site and rural land in the south-east corner.



Figure 1: Moolap Planning Area

3.2 Natural and cultural heritage values

The Moolap Planning Area has number of significant natural and cultural heritage values:

- The Moolap saltfields 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.
- On average, more than 5,000 birds from more than 68 species use the Moolap saltfields annually, including three threatened species—red-necked stint, and the sharp-tailed and curlew sandpiper—and 22 shore birds protected by international treaties. Protection is also given to many of these birds under Australia's *Environmental Protection and Biodiversity Conservation Act 1998* (EPBC Act). Federally threatened species that visit are the Australasian bittern and fairy tern, along with the nationally significant little tern and Latham's snipe. As well as protection under the EPBC Act, a number of visiting bird species are listed under the Victorian *Flora and Fauna Guarantee Act*. These include Baillon's crane, fairy tern, grey-tailed tattler, great egret, little egret and little tern.

- One of the largest areas of seagrass (see Figure 2) in Port Phillip Bay adjoins the shoreline of the Moolap Planning Area, with extensive areas of *Zostera* and *Heterozostera* seagrasses in Stingaree Bay and around Point Henry, and between Point Henry and Avalon to the north.



Figure 2: Distribution seagrass meadows (blue), coastal saltmarsh (green) and berm shrubland (green parallel lines along shoreline) in the Moolap Planning Area.

- A significant remnant of Port Phillip Bay's severely diminished area of coastal saltmarsh, a nationally threatened community, grows on the former Cheetham Saltworks site (since European settlement, 50% of the coastal wetlands along Port Phillip Bay's western shoreline have been removed) and is coloured green in Figure 2. Although modified to form the Cheetham saltworks, the species, habitats, ecological function, form and structure are similar to more pristine examples (Ecology Australia 2016, *Vegetation, biodiversity and social values of the former Cheetham saltworks, Moolap*).
- Marine and coastal ecosystems, including the coastal saltmarsh and seagrass meadows in the Moolap Planning Area, provide a number of ecosystem services for the community. These include fish nurseries (in the seagrass meadows), shoreline protection and blue carbon storage; these services should be assessed and factored into coastal planning decision-making processes.
- There are nine rare or threatened plant species, and at least two that are critically endangered, in the former Cheetham Saltworks.
- The Bengalat balug (clan) of the Wathaurung people harvested fish, shellfish and other resources from the Moolap Planning Area for thousands of years.
- The former Cheetham Saltworks, according to the Victorian Heritage Register, is of state significance 'for its associations with the early and highly important salt industry in Victoria. It was the first successful solar saltworks established in Victoria and the extensive industrial site demonstrates the early evolution of the salt industry. Cheetham Salts continued as an important and prominent Victorian industry throughout the 20th century...' (Victorian Heritage Register).
- Other heritage sites within the Moolap Planning Area include the Belle Vue and Bayview homesteads, the Point Henry Maritime Heritage Precinct and the Point Henry West Hard and Rubbish Tip. The values of the Maritime Heritage Precinct include: pilots and quarantine service, harbour trust, channels and navigational services, agriculture, immigration, recreation and tourism, aquaculture, a shell extraction industry and a strong significance for Wathaurung people. Little is known of the history of the Point Henry West Hard and Rubbish Tip. According to the Victorian Heritage Database it is 'linked to the general recreational landscape of Point Henry and the tea gardens in this region'.

4. Previous VNPA submissions to Moolap planning

VNPA has made two previous submissions to the Moolap planning process, one in February 2016 and the other in July 2016. The first submission identified that:

- Planning authorities highly value the natural and cultural heritage values of the Moolap Planning Area, and for many years they have worked to protect these 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 undermine these planning strategies.
- 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 (see Figure 3), 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.



Figure 3 Ridley Corporation's Nelson Cove proposal

- 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 in the G21 regional Growth Plan (see Figure 6), which include Armstrong's Creek and Lovely Banks, are designed for that very purpose and will satisfy housing demand for decades to come.

The first VNPA submission proposed a Moolap Coastal Park (VEAC's public land investigation now recommends that coastal park become conservation parks) that 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. The area would then 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, ecotourism and enjoyment.

VNPA's first submission added that future planning for Moolap 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 marinas.
- 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 lines away from the foreshore.

It also reaffirmed that any planning for Moolap should not include a canal estate, re-industrialisation of Point Henry and the major new road, rail and port infrastructure required by it, and linear coastal development.

The focus of VNPA's second submission in July 2016 was the seven preferred land use scenarios released by DELWP. In that submission, VNPA gave its full support to the Conservation scenario, which was supported by 73% of the respondents in the consultation period.

5. Key proposals in The Plan

The Plan makes a number of major proposals for the future use of the nearshore waters and coastal land within four precincts and the Coastal Foreshore (see Figure 4). Included is a draft land use direction (see Figure 5) for the Moolap Planning Area, preferred uses within the precincts, proposed changes to current planning zones, and infrastructure projects. This section reviews these as they apply to:

- conservation of the former Cheetham Saltworks
- a new urban growth area at Moolap
- removal of the rural/urban buffer between Moolap and Leopold
- expansion of the coastal foreshore (and continuous access)
- a flood-free road connecting southern and northern Point Henry
- new boating facilities and marinas
- a road or tunnel across Corio Bay
- shared pathways along the foreshore.

To some of these VNPA can give qualified support, but to others we cannot. Nor can we support the draft land use direction proposed by The Plan, in particular the intensive tourism and residential development proposals for the Point Henry and South-east precincts. As a result, we are unable to support the proposed changes to planning zones as shown in Figure 5. Our reasons for this will be detailed below as we discuss each of the key proposals, but before doing that we wish to express our concern at the way in which the precincts are delineated.

The contiguous seagrass meadows abutting the Moolap Planning Area's shoreline have been broken up and placed within three of the four precincts, hardly the best way to ensure their protection and integrated management. The result is that they would be opened up to separate and damaging pressures from the developments, which include marinas and other boating facilities in at least the Point Henry and South-east Precincts (and not ruled out of the Saltworks and Wetlands Precinct). The Plan has relegated the seagrass meadows to being a backdrop rather than an integral part of the area's natural values in need of protection.

Although the Coastal Foreshore is neither mapped nor referred to as a precinct—based on the maps it is part of the other four precincts—The Plan does make recommendations for its conservation, use and development. Except for long stretch of freehold land abutting the high-water mark along the eastern shoreline of Point Henry top Clifton Avenue, the Coastal Foreshore is largely the land within the Point Henry Foreshore Reserve. The management plan for that reserve contains a number of maps that could be used as the basis for one in the final version of The Plan. That map should show both the coastal crown land and the freehold land abutting the high-water mark. This would help the community understand the narrow and fragile nature of the foreshore area and the need to expand it by the transfer of freehold land to the crown.

RECOMMENDATION 1: CREATE A NEARSHORE WATERS PRECINCT

- A. That the seagrass meadows (nearshore waters) should be delineated as a separate Nearshore Waters Precinct in the final version of The Plan, with recommendations that focus on their conservation.
- B. That the Coastal Foreshore be excised from the maps of the Point Henry, Industrial and South-east precincts and established as a separate precinct or integrated with the Nearshore Waters Precinct.
- C. That a map of the Coastal Foreshore, showing coastal crown land as well as freehold land abutting the high-water mark, be included in the final version of The Plan.



Figure 3 Precincts in the Moolap Plan

DRAFT LAND USE DIRECTION SUMMARY

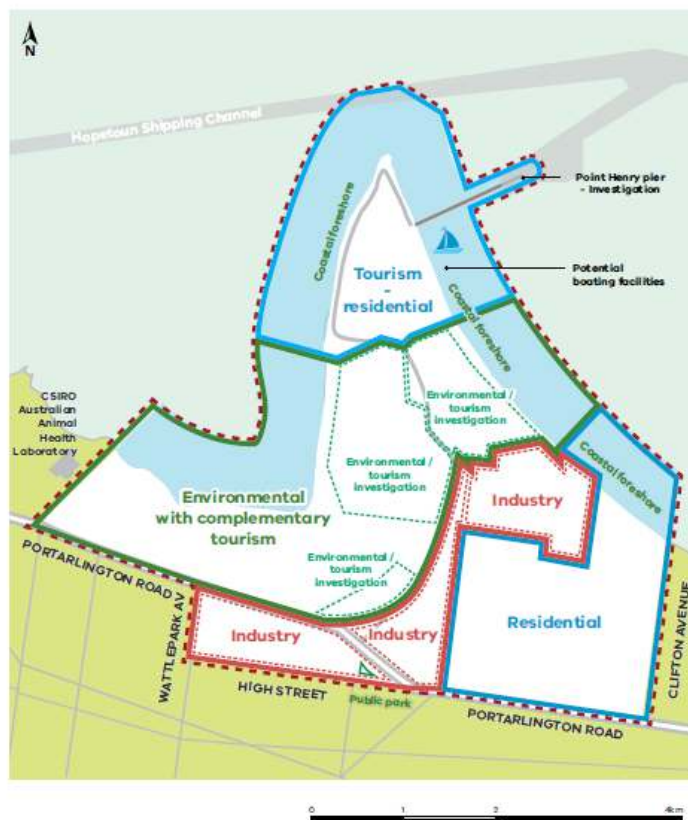


Figure 4 Draft land use direction for the Moolap Planning Area

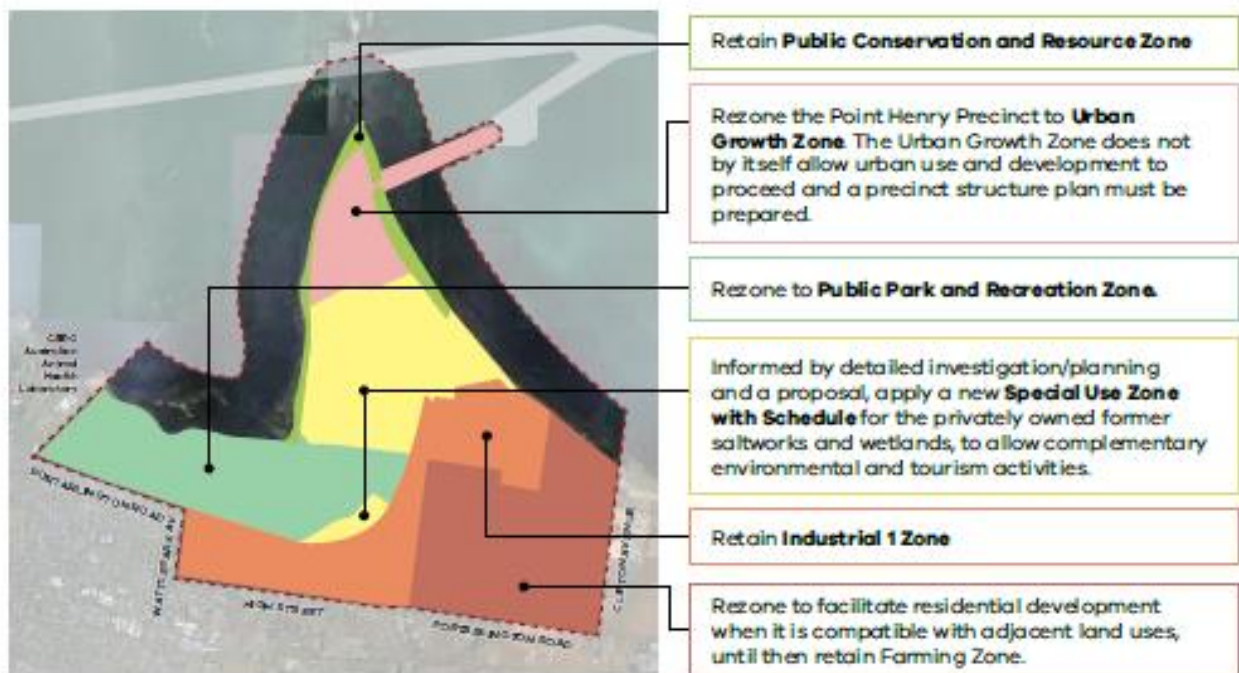


Figure 5: Proposed land-use zoning changes.

5.1 Conservation of the former Cheetham Saltworks in the Saltworks and Wetlands Precinct

VNPA, along with other community groups such as the Geelong Environment Council, the Geelong Field Naturalists Club, and Birdlife Australia, have consistently advocated that the former Cheetham Saltworks site, including both the crown land (leased by the Ridley Corporation until 2031) and the company's freehold, be protected as a conservation reserve, along with Alcoa's low-lying saline land to the east.

The Plan goes part of the way to such an outcome by recommending that the site's crown land be zoned Environmental/Complementary Tourism, although what constitutes complementary tourism is unclear. We are also concerned that the future of the Ridley Corporation and Alcoa land would be the subject of a vague tourism investigation conducted by the landowners.

Further, there is an expectation in The Plan that any cost of restoring, protecting and managing the former saltworks site has to be covered by a revenue stream. That is not the case for the massive public investment to provide road, boating and other infrastructure that would be required to implement many of The Plan's other recommendations.

The Plan also recommends in Chapter 6 that, within the next decade, the crown land component of the Cheetham Saltworks site be rezoned from Special Use Zone Schedule 1: salt production and aquaculture to Public Park and Recreation Zone (PPRZ). The purpose of PPRZ is to recognise areas for public recreation and open space, to protect and conserve areas of significance where appropriate, and to provide for commercial uses where appropriate. It is the same zoning that covers Geelong's Eastern Park, to the west of the former saltworks, which has a very different purpose.

The seagrass meadows in Stingaree Bay and along the eastern shoreline of Point Henry are zoned Public Conservation and Resource Zone (PCRZ), the purpose of which is to protect and conserve the natural environment and natural processes for their historic, scientific, landscape, habitat or cultural values, to provide facilities which assist in public education and interpretation of the natural

environment with minimal degradation of the natural environment or natural processes, and to provide for appropriate resource based uses.

Based on the stated purposes of each zone, PCRZ is more appropriate for the former Cheetham Saltworks and would recognise the integrated nature of nearshore waters (already zoned PCRZ) and coastal land.

In Alcoa's Envisioned Concept Master Plan (see Figure 6), the Alcoa-owned component of the Saltworks and Wetlands Precinct was designated as wetlands with boardwalks, birdwatching hides, a coastal park and a coastal trail. There was reference to an ecotourism and education concept but that was on higher ground at the southern edge of the wetlands. The same could apply to the Ridley Corporation land, with both freehold areas zoned as PCRZ.

Waiting for up to 10 years for a rezoning of the Cheetham Saltworks (see Implementation section of The Plan) is too long if this means that their current inadequate management is to continue. The current lessee (the lease is due to expire in 2031), Ridley Corporation, is failing to look after the wetlands and is also refusing entry to the Geelong Field Naturalists Club, which has been monitoring bird populations there for more than 30 years.

RECOMMENDATION 2: CONSERVE WETLANDS ON CROWN AND FREEHOLD LAND IN THE SALTWORKS AND WETLANDS PRECINCT

A. That the final Moolap Coastal Strategic Framework Plan recommends that the former Cheetham Saltworks be rezoned from SUZ1 to Public Conservation and Resource Zone.

B. That the Alcoa owned wetlands component of the Saltworks and Wetlands Precinct be rezoned from Industrial Zone to Public Conservation and Resource Zone.

C. That in the interim, a management plan be developed for the Saltworks and Wetlands Precinct to, among other things, re-establish effective water level management that enhances the area for resident and migratory birdlife, and enable regular monitoring of birdlife by the Geelong Field Naturalists Club.

D. That the Victorian Government act to bring an immediate end to the current Ridley Corporation lease over the crown land component of the Saltworks and Wetlands Precinct.

5.2 A new urban growth area in the Point Henry Precinct

It is just four years since the then Minister for Planning, the Hon Matthew Guy, launched the G21 Regional Growth Plan in April 2013, while it was only September 2014 that the Victorian Coastal Council released its 2014 Victorian Coastal Strategy. Despite these recent planning strategies, The Plan is making proposals that will undermine them, as well as many current and recent planning strategies and reports by the City of Greater Geelong. It states that:

The Moolap Plan study area provides potential for additional growth on Geelong's east to take advantage of central Geelong services and the coastal context, and may potentially alleviate some of the growth pressure from the Bellarine Peninsula coastal towns.

The opportunity exists to create a signature urban area for Geelong that is different to anything else on offer in the Geelong region.

As Figure 6 shows, the areas identified for planned growth in the G21 just four years ago (and now in the City of Greater Geelong's planning scheme ordinance), were Colac and Winchelsea to the west, Inverleigh, Teasdale, Bannockburn and Lethbridge to the north-west, Lara to the north, Leopold, Drysdale/Clifton Springs, Ocean Grove, Point Lonsdale and St Leonards to the east and south-east, and Armstrong Creek and Torquay/Jan Juc to the south. Figure 6 also identifies four locations for key settlement breaks to the north-east, the west, the south and, at Moolap (see section 5.3 for a discussion of the rural-urban break in the South-east Precinct).

The only major change that has occurred in the Moolap planning area since then is Alcoa's closure of its aluminium smelter at Point Henry. But even Alcoa's Envisioned Concept Master Plan (see Figure 7) did not propose residential development at Point Henry. Instead, it identified a point park, civic open space, wetlands, some retained industrial buildings, recreation reserves, community open space and a small area of civic, tourism and mixed use opportunities and retained buildings.

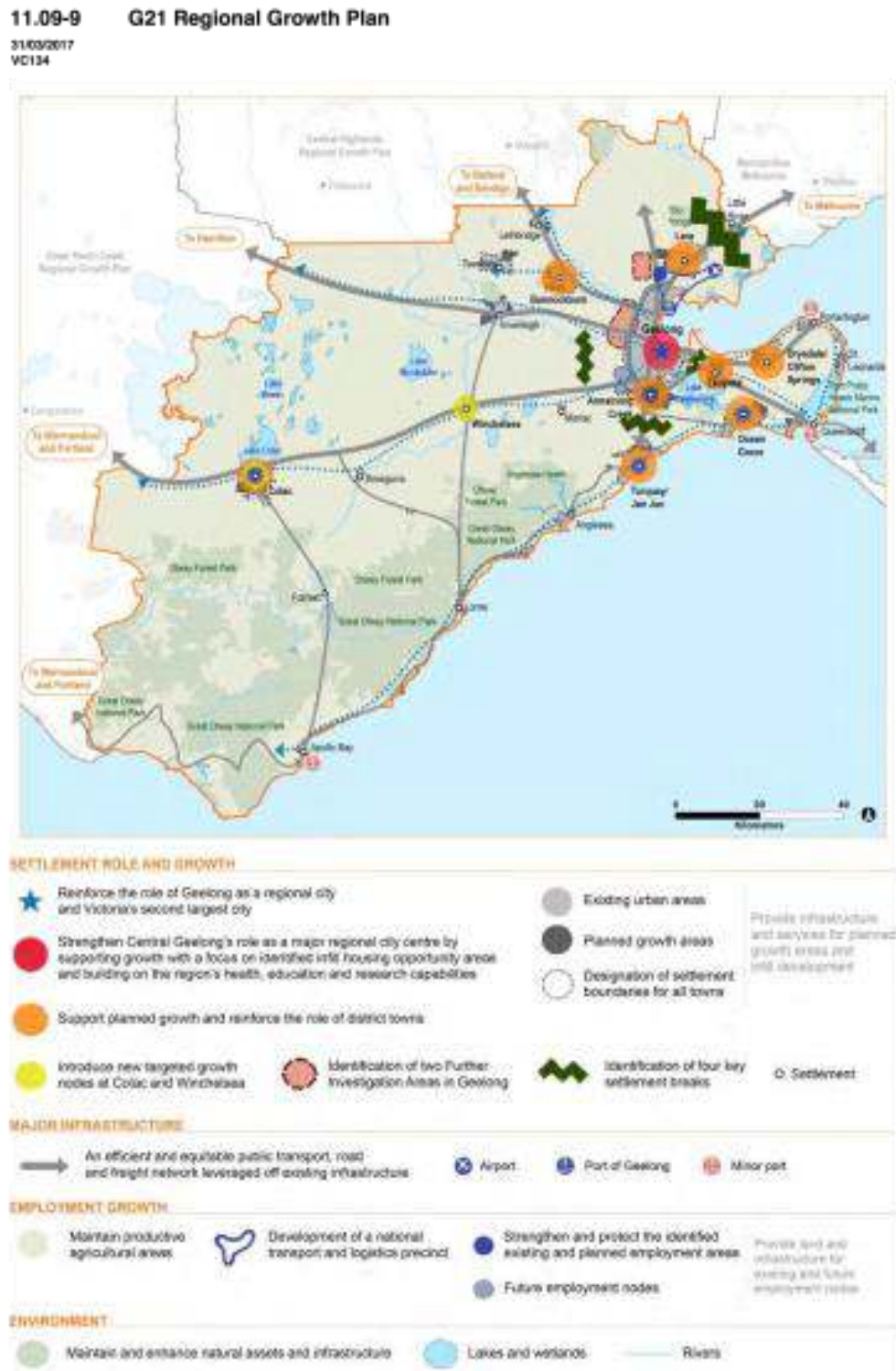


Figure 6: G21 Regional Growth Plan

Clause 21.05 Coastal Environments in the City of Greater Geelong's planning scheme states that its objectives are:

- To protect, maintain and enhance the coast, estuaries and marine environment
- To respect and manage coastal processes.

The strategies to achieve these objectives are to:

- Focus urban coastal development within existing urban settlements
- Prevent lineal urban sprawl along the coast
- Avoid the loss of, and wherever possible increase, public access to the foreshore environment
- Restrict development on primary dunes
- Ensure the potential for existence of acid sulphate soils adjacent to coastal and wetland locations is considered
- Limit the number of stormwater outlets to the coast
- 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.

Each of these strategies must guide the decision-making on the future of the Moolap Planning Area, and they provide the substantive case for conserving the natural and cultural heritage found on the Crown Land (and some private land) there.

Further, the objectives of Clause 21.05-5 Climate Change are 'To plan for and adapt to the impacts of climate change', while the Strategy is to 'Avoid land use and development within areas considered at risk of coastal erosion or inundation from flooding, storm surge or rising sea levels'.

The Plan's proposed primary direction of tourism and residential for the Point Henry Precinct is also inconsistent with the 2014 Victorian Coastal Strategy policies for decision-making, as the following extracts show (VNPA comments in square brackets).

On page 57:

3. Coastal settlements and growth are appropriately planned and managed by:
 - ...d. facilitating growth into areas that do not threaten wetlands and estuaries [applies to Saltworks and Wetlands Precinct]
 - ...g. considering the impact of inland (hinterland) settlement growth on coastal areas (e.g. increased demand for use, infrastructure and access) [applies to Point Henry, South-east and Industrial precincts]
5. Existing non-urban breaks between all coastal settlements must be maintained to support community identity and inspire a sense of place [applies to South-east Precinct]
6. Avoid linear urban sprawl along the coastal edge and within rural landscapes, protect areas between settlements for non-urban use [applies to Point Henry and South-east precincts]

And on page 69:

3. Plans for visitor and tourist developments outside settlements must take into account:
 - a. significant landscapes, ensuring that developments do not compromise the broader 'open space' characteristics of the coast [applies to all precincts]
 - b. protection of non-urban breaks between settlements and their significant values including areas of environmental and heritage sensitivity [applies to South-east Precinct]
 - c. ensuring that tourism developments do not become new settlements or create linear coastal development... [applies to Point Henry Precinct]
 - ...e. sensitive areas to be protected from damage and the introduction of pests and weeds... [applies to all precincts]

The Greater Geelong & the Bellarine Tourism Development Plan is cited by The Plan as supporting the need for massive investments in tourism infrastructure and accommodation across the region (perhaps its environmental sensibility can be judged by its 'experiential tourism' stingray feeding

proposal for Queenscliff Harbour, which was rightly crushed by community opposition). It's a very narrow document obsessed with tourism development — the word 'environment' is not mentioned once in the summary document (the full version is only available on request). Although 'environment' does get one mention in the related Strategic Plan 2014-2017, it is only when the plan refers to 'our online environments'.

Although not referred to directly in The Plan, the concept of urban infill may be the driver of its proposal for the Point Henry Precinct. In that, the authors of The Plan may be interpreting the following extract from page 57 of the 2014 Victorian Coastal Strategy as supporting that idea.

3. Coastal settlements and growth are appropriately planned and managed by:
 - ...e. directing residential, other urban development and infrastructure to areas within boundaries of existing settlements that are capable of accommodating growth
 - f. encouraging urban renewal and redevelopment opportunities within existing settlements.

The Moolap Planning Area is on the eastern edge of the Geelong planning boundary as identified in City of Greater Geelong planning strategies. Whether this means that the site is infill or not is moot, although we would argue it should not be considered as infill, because the nature and scale of the proposed developments are inconsistent with the above planning strategies and would be detrimental to the social and environmental amenity of the Point Henry Precinct and the adjoining wetlands and seagrass meadows.

RECOMMENDATION 3: NO NEW URBAN GROWTH AREA IN THE POINT HENRY PRECINCT

- A. That the final version of The Plan not include a proposal for a new urban growth area at Point Henry.
- B. That the Point Henry Precinct be used for recreational open space, civic, ecotourism and mixed uses at a scale and location appropriate to its sensitive coastscape.



Figure 7: Alcoa's Envisioned Concept Master Plan Components

5.3 Removal of the rural/urban buffer in the South-east Precinct

The land within The Plan's South-east Precinct has for many years provided a buffer between urban Geelong and the rural Bellarine Peninsula. That has by no means been accidental; it has been a key objective of City of Greater Geelong planning strategies.

Conducted in 2009, the Geelong Eastern Boundary Review evaluated whether Geelong's eastern boundary should be extended and take in the Moolap Industrial Area and land between it and Reedy Lake. The review included a number of principles and directions for future planning of the area, including to 'maintain the open plains landscape of Moolap, as an inter-urban break between eastern Geelong and Leopold'. According to the review, 'the rural strategy reinforces the general policies of the Bellarine Peninsula Strategic Plan to maintain rural breaks between urban Geelong and townships'.

The City of Greater Geelong's Rural Land Use Strategy states that:

...the city has consistently adopted the approach of maintaining rural landscapes within the context of population growth in urban areas. Planning for non urban breaks between urban areas, particularly coastal settlements, is crucial in protecting the values that attract new populations and offering a more sustainable form of settlement growth.

The 2012 Planning Panel Report, Greater Geelong Planning Scheme Amendment C254 Leopold Structure Plan Leopold Urban Design Framework, considered the importance of maintaining a non-urban break between Leopold and Moolap. The report concluded that the gap between Leopold and Moolap was 'An important public open space for a growing Geelong, which adds to the city's liveability and sustainability'. Further:

- The Panel notes the strong planning policy basis in the Greater Geelong Planning Scheme for 'contained' townships. While this is a policy that applies across the municipality, it is particularly strong on the Bellarine Peninsula where the emphasis is on keeping the individual identity of towns and in keeping them separate. A 'containment' philosophy is consistent with State policy and is endorsed by the G21 regional emphasis on 'settlement breaks'.
- The Panel therefore accepts that a non-urban break between Moolap and Leopold has been a longstanding policy at all levels, notwithstanding that there is no explicit reference anywhere to Clifton Avenue being the boundary of that break.
- The Panel strongly supports the principle of the non-urban break between Leopold and Moolap.

However, The Plan proposes that the South-east Precinct, much of which is owned by Alcoa, be rezoned and developed as residential. This recommendation would appear to have been heavily influenced by Alcoa's Envisioned Concept Master Plan for the 575 hectares of land that it owns (the smelter site occupies less than half of that land) within the Moolap Planning Area. The company's master plan also recommended that the rural land in the South-east Precinct be developed for residential use.

The Plan places a number of caveats on the future residential development of the South-east Precinct. These include the need to remove what would be a conflict between nearby industry and housing, the latter being unable to proceed under existing industry buffer regulations, and the availability of developable land elsewhere in the Geelong region:

Residential land use is currently incompatible with existing industries due to the large industrial buffers of up to 2 kms.

Currently, approximately 25 years supply of residential land is zoned in the Greater Geelong City Council area.

There is no designated time period for residential development and the precinct will require periodic monitoring and review of appropriate buffer and separation distances.

The effect of these caveats, The Plan admits, is that residential development in the South-east Precinct is likely to be many years into the future, if at all. It is VNPA's belief that the residential development of the South-east Precinct should not occur and that the current zoning be retained with efforts made to improve native vegetation cover, wildlife corridors and biolinks within the precinct, into other precincts and beyond the Moolap Planning Area e.g. to Reedy Lake.

RECOMMENDATION 4: RETAIN THE RURAL-URBAN BUFFER IN THE SOUTH-EAST PRECINCT

- A. That the South-east Precinct be retained as an urban-rural buffer between the eastern edge of Geelong and the Bellarine Peninsula.
- B. That in cooperation with landowners, the existing vegetation restoration projects in the South-east Precinct be extended to establish new wildlife corridors and biolinks across the Moolap Planning Area.

5.4 Expansion of the coastal foreshore (and continuous access)

Widening the Point Henry Foreshore Reserve and securing crown land tenure for freehold land abutting the high-water mark on the eastern side of Point Henry was an important recommendation in a previous VNPA submission. The Plan gives support for this action on page 12:

State policy supports coastal foreshore areas being in public ownership...There is a need to increase public ownership of the coastal foreshore.

And on page 57 of The Plan:

Facilitate the acquisition or contribution of coastal foreshore from private land owners to provide continuous Crown coastal foreshore from the CSIRO to Clifton Ave and improve connectivity, access and integration.

However, The Plan does not indicate which of the freeholds strips abutting the high-water mark should be acquired, how and when they should be acquired and how much of those strips should be acquired, nor provide any implementation strategy for this proposed direction.

RECOMMENDATION 5: WIDEN AND LINK UP THE POINT HENRY FORESHORE RESERVE

- A. That the widening and extension of the Point Henry Foreshore Reserve be a priority in the next five years
- B. That as part of the reserve's widening process, the Point Henry Road be realigned to the east of the existing reserve boundary.

5.5 A flood-free road connecting southern and northern Point Henry

This is something VNPA emphasised in its submission to the discussion paper and we are pleased that the plan supports it. The design must ensure that the new road does not create a barrier for wetlands water flow across the Point Henry peninsula, but The Plan fails to provide any details on the road's design and alignment.

RECOMMENDATION 6: BUILD A FLOOD-FREE POINT HENRY ROAD

- A. That the design and construction of a flood-free section of the Point Henry Road ensure that wetlands water is allowed to flow beneath it to ensure the maintenance of the wetlands habitats.
- B. That the Point Henry Road be realigned further east of the former Cheetham Saltworks site as a response to likely sea level rise and to also create a wider buffer between the road and the wetlands.

5.6 New boating facilities, marinas and bay access in multiple precincts

The Plan proposes bay access from boating facilities and marinas for the Point Henry and South-east precincts in The Plan, and are not ruled out for the Wetlands and Saltworks Precinct. But as the Central Coastal Board's Boating Facilities Framework Plan from 2014 points out:

Boating, unlike some coastal activities, has an infrastructure footprint and potentially boaters can have an adverse impact on sensitive natural areas. Possible impacts from boating include rubbish and pollution, the spread of marine pests, damage from dredging and mooring chains and sedimentation from breakwaters. There are also people impacts where boaters come ashore and may disturb migratory shorebirds at key Ramsar sites or locally significant heritage areas (page 14).

One impact that was not listed, but which will become more significant in the coming years, is the impact on fish populations by the users of these boating facilities as they venture out into Port Phillip Bay.

The framework plan also highlights that there are other users of the coastal crown land that should be considered:

Coastal space is highly valued for its visual amenity, the sense of well-being it engenders, and the number of activities that can be enjoyed on and offshore. It is a limited resource under high demand. Boating is only one of the activities sharing coastal space, therefore when determining priorities for improving boating infrastructure, consideration should be given to facilities that will also benefit the wider community (page 15).

The Central Coastal Board's framework plan acknowledges that boat ownership is growing, largely in the Werribee and south-eastern areas of Port Phillip Bay, but states that 'Simply providing additional infrastructure for the ever-growing demand may not be sustainable in the context of limited coastal space and other uses of coastal areas, including environmental protection' (page 49) and recommends that 'Improving the overall efficiency and usability of existing infrastructure to reduce the need for more boating facilities and the demand on public resources' (page 15)'.

To that end, the Central Coastal Board identified the boating facilities planned to be in place by 2030 (see Figure 8). There are none planned for the Moolap Planning Area.

The Leopold Land Capability and Bay Access Report by Spiire consultants, tabled during a December 2015 meeting of the City of Greater Geelong, touched on the provision of bay access along the coastal foreshore north of the Leopold Growth Area. The report's conclusion was that access to the bay should be passive rather than active (the underlining is ours):

- Physical access into the Bay itself within the Study Area (i.e. beach foreshore areas and boat access ramp infrastructure) is not desirable or appropriate in this location due to environmental constraints including seagrass meadows and existing low tide levels. Furthermore, physical access infrastructure is expensive to provide and maintain and Council priorities are to improve existing facilities in alternative locations along the northern edge of the Bellarine Peninsula
- The lack of public land along the foreshore in this area prevents Bay access for the community from being easily provided by Council. Any Bay access will need to be provided through the purchase of land or associated with land development.
- Passive Bay access would be more appropriate than physical access into the Bay itself as it would balance the need to protect the foreshore's environmental significance and the desire to capitalize on the amenity of the Bay for the Leopold community (Spiire, Page 101).

The Spiire report also stated that:

Threats to Seagrass in Victoria are identified in the 'Marine and Freshwater Institute Report Np. 39 – Seagrass Mapping of Port Phillip Bay' (2001) and arise from population pressures in the coastal zone coupled with climate change impacts. These factors lead to:

- Greater sediment and nutrient loads entering nearshore systems.
- Mechanical damage from commercial (e.g. dredging, commercial fishing techniques) and recreational (e.g. propeller scaring, anchor damage, trampling) activities.
- Alterations of hydrodynamic regimes (e.g. regulation of freshwater flows, alteration of nearshore circulation by built structures and modification of bathymetry) (Spiire, page 53).

And:

The costs involved in maintaining any infrastructure required to provide physical Bay access would be high and are likely to include regular dredging of channels to provide boat access to a ramp or jetty and maintenance of the facility itself. Periodical dredging and maintenance costs will be the responsibility of Council unless the facility is privately operated (Spiire, page 100).

The conclusions of the Spiire report are most apt for the foreshore and nearshore waters of the Moolap Planning Area, just a few kilometres west of Leopold and with a similar nearshore ecology. Together, the Spiire report and the 2014 Boating Facilities Framework Plan reveal that new boating facilities and marinas are neither needed nor appropriate for the Moolap Planning Area.



Figure 8: The Boating facilities Framework Plan for 2030

RECOMMENDATION 7: NO NEW BOATING FACILITIES AND MARINAS IN MULTIPLE PRECINCTS

That there be no provision for new boating facilities, including marinas, in the final version of The Plan, with the more efficient use of existing facilities along the Corio Bay, Bellarine Peninsula and open coast shorelines meeting the future needs of the boating sector.

5.7 A road or tunnel across Corio Bay

The Plan refers to a 'potential road connection north beyond the Point Henry peninsula', suggesting that any development or use of the Moolap Planning Area not preclude this future option. Such a road connection, possibly a road bridge or tunnel between Point Henry and Point Lillias, would be hugely expensive but would also destroy extensive seagrass areas, occupy large areas of the coastal crown land at either end, severely damage coastal amenity and substantially reduce Moolap's conservation, recreational and tourism potential. Coupled with the proposed Bay West container port between the Werribee River mouth and Point Wilson (see Figure 9), recently recommended by Infrastructure Victoria, there would be substantial further losses of coastal saltmarsh along the eastern shoreline of Port Phillip Bay, of which 50% has already been lost since European settlement.

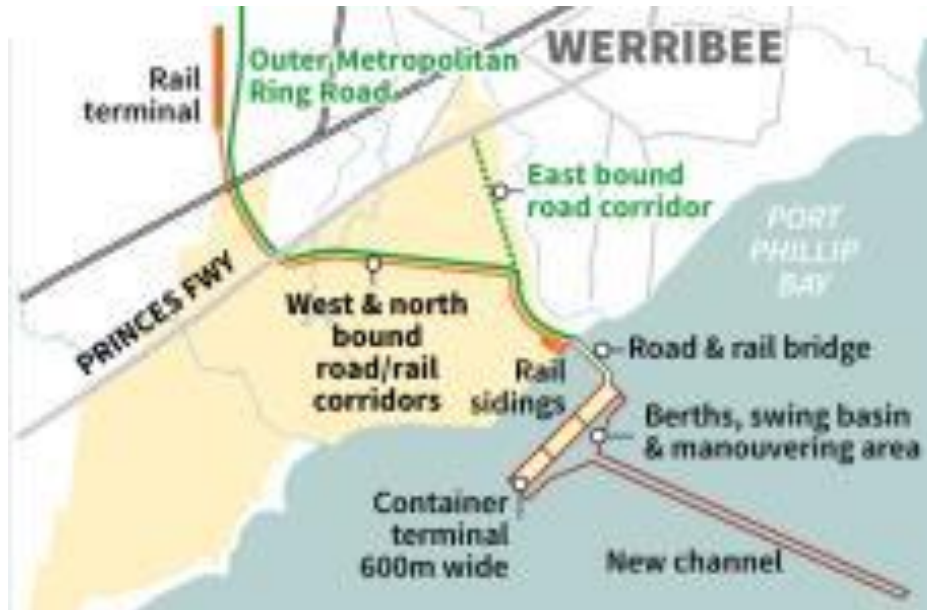


Figure 9: Bay West container port

RECOMMENDATION 8: NO ROAD CONNECTION NORTH OF POINT HENRY

That there be no provision for a potential road connection north beyond the Point Henry peninsula in the final version of The Plan.

5.8 Shared pathways with continuous access to the foreshore

The Plan recommends:

Facilitate the timely provision and operation of a sustainable public transport and shared path network which connect the Point Henry Precinct with central Geelong and other key locations.

VNPA acknowledges the need for improved public transport, the encouragement of walking and cycling and the minimisation of car use in the Moolap Planning Area, but has reservations about the concept of a shared pathway network that would likely hug the foreshore providing 'continuous access' to the shoreline.

The Victorian Coastal Strategy has always recommended against new roads that parallel the coast because they place 'continuous' pressure on the narrow remnants of coastal habitats along their route, disturb wildlife, create many access management issues, occupy large amounts of coastal public land and place fixed infrastructure in the path of a rising sea level. It is better to have main roads further back from the coast, with feeder roads that take visitors to key and well-managed view and access points.

The same can be said of pedestrian/cycle paths that hug the shoreline. As well as creating a barrier for people wishing to access the foreshore, and a safety risk, they take up considerable public coastal land. They too should be located further from the foreshore with feeder paths used to take walkers and cyclists to view and access points. Separate paths for walkers and cyclists should also be considered to minimise their width and the loss and space —and the safety risk.

In the report, *Shared paths: the issues*, Victoria Walks outlines significant reservations about shared paths:

Generally, slow moving recreational cyclists may be able to share paths with walkers. However walkers may not mix well with commuter or sports cyclists in particular, who typically travel at higher speed. For example, in one Sydney survey 8% of pedestrians reported being knocked over by a cyclist and 33% reported being frightened by a cyclist travelling too fast.

The report recommends, among other actions:

- Shared paths should be designed, managed and promoted with 20 km/h or less envisaged as the desired cycling speed
- Open space managers in growth areas should ensure that key open space areas provide dedicated walking paths
- The Department of Economic Development, Jobs, Transport and Local Resources or Municipal Association of Victoria should undertake research on the legal liability issues relating to shared paths.

The Plan needs to be far-more creative in its ideas about the design and location of pathways.

RECOMMENDATION 9: DESIGN IMAGINATIVE AND LOW-IMPACT PATHWAYS

A. That walking and cycling be encouraged in the Moolap Planning Area with the imaginative design and location of paths that minimise pressure on the natural and amenity values of the foreshore and wetlands.

B. That the main paths be located back from the foreshore with feeder paths to key access points.

C. That freehold land be transferred to the crown to create a wider buffer between the paths and the foreshore.

D. That separate cycling and walking paths be part of the path network.

6. Chapter by chapter comments on The Plan

This section of VNPA's submission comments on the plan's proposals and supporting arguments in chapters 1-6. Tables are used to summarise this submission's commentary, the left column containing selected quotes from the plan's text, while the right column is used to present VNPA comments on that quoted text.

Chapter 1 Introduction

The Plan Text	VNPA comment
The study area is... currently underutilised...and inactivity on the former Cheetham Saltworks.	The closure of the Point Henry smelter affects only one part of the study area and, even though it is no longer operational, it retains an industrial use because much of its infrastructure remains. Elsewhere, the area is used for rural activities, industry and recreation, and by birds and other wildlife. The words 'underutilised' and 'inactivity' are loaded terms that help justify The Plan's proposed development at a scale inappropriate from a coastal planning, protection and management perspective.

Chapter 2 The study area

The Plan Text	VNPA comments
Some other key features and facts about the study area	<p>VNPA accepts the list of key features and facts in this paragraph but believe that mention should also be made of:</p> <ul style="list-style-type: none"> publicly owned foreshore that surrounds almost all of the Point Henry area significant numbers of threatened migratory birds that use the former Cheetham Saltworks the recreational use of the Point Henry Foreshore Reserve some of Port Phillip Bay's largest areas of seagrass meadows surrounding Point Henry the rural-urban buffer between Geelong and the Bellarine Peninsula

Chapter 3 Preparing the draft Moolap plan

This chapter in the plan described the Moolap planning process, land use considerations and land use findings, based on research, feasibility analysis and community consultation. VNPA's submissions

The Plan Text	VNPA comments
3.1 Key inputs and processes	
The draft Moolap Plan has been informed by background research, feedback from two rounds of community engagement, and consideration of the feasibility and strategic implications of different land uses. This has resulted in land use findings which are the basis of the draft Moolap Plan.	VNPA has been happy with the stages in the process, but disappointed with the failure to release the feasibility and impact analysis or detail of the analytical method
3.2 Land use considerations	
<p>Consideration of the strategic implications included:</p> <ul style="list-style-type: none"> which land uses had the greatest benefit to the Geelong economy, environment and community 	The implications of this planning process are far broader than Geelong. The planning outcomes will have statewide implications, and in the case of the threatened migratory species, national and international implications. There needs to be a clearer definition of what is meant by 'benefit'.
3.3 Land use findings	
Rural land	
The retention of rural land is consistent with Greater Geelong City Council's current rural and settlement policies. The area needs to be considered in the context of the future growth of Geelong, which aligns with survey	The Moolap plan acknowledges but then dismisses the City of Geelong's long-term planning objective, which in part is to retain the South-east Precinct as rural land to serve as an urban/rural buffer. Geelong's planning, especially the G21 plan released in

respondents to the Discussion Paper who expressed the need to “plan for the long term”. This land is in close proximity to central Geelong, is well elevated, has few constraints and has the potential for a range of non-rural land uses.	2013, aims to manage Geelong’s growth, with a number of designated growth areas that include Armstrong’s Creek. The Plan discards that and instead proposes a new urban growth area at Point Henry. In its place, the plan argues for an urban growth area that would comprise substantial residential/resort development. To justify this, The Plan cites the results of its phase 2 consultation, which revealed that 81% of respondents viewed the statement ‘Plan for the long-term’ as being very important. The Plan neglected to add, though, that in the same consultation, 82% said that the statement ‘Protect the Environment’ was very important too. Further, 71% of respondents supported the ‘Conservation’ scenario, while only 5% the largely residential scenario and 16% the tourism scenario. Those results suggest that respondents wanted to see long-term planning used to conserve the study area, not to establish large-scale residential and tourism development. The Plan should argue the case for its proposals on their merits, not by cherry-picking the consultation results.
Conclusion: Consider alternatives to rural land use/s that better take advantage of the site and Geelong’s growth potential.	The term ‘take advantage’ is used frequently in The Plan to justify major tourism and residential development. But the planning process in Moolap could ‘take advantage’ of the site’s natural values to create a conservation park for wildlife, recreation and ecotourism. Geelong’s growth will require open space and lungs. The second phase of consultation also revealed that only 51% said the statement ‘Plan for uses that take advantage of the coast’ was very important. In this context, and the other results of the consultation surveys, conservation and recreation should also be viewed as uses.
Public open space	
A review by Greater Geelong City Council indicates an adequate supply of existing regional scale parks in the urban areas of Geelong and beyond.	This section of the plan refers to a review in vague terms. What is the review? Who conducted the review? When was it conducted? What were its parameters? VNPA contacted the City of Greater Geelong to obtain a copy of the review, but the only document available was the 2001 Open Space Strategy. Although VNPA supports the objectives of that strategy, we don’t believe that any data behind it, which would be more than 16 years old, should be used to justify not establishing a major park in the Moolap Planning Area. And since that time, the growth of Geelong has accelerated. If DELWP has recent data, it should release it.
Conclusion: There is a need to increase public ownership of the coastal foreshore.	VNPA strongly supports this sentence in the conclusion but the plan provides no implementation steps to achieve it.
Salt production and aquaculture	
Conclusion: There is no demonstrated demand for salt production/ aquaculture. Alternative land uses should be considered.	This is the logical conclusion to draw but it’s the reference to ‘alternative land uses’ without providing examples that is of concern. Conservation is a land use, and that should be the primary land use direction for the Saltworks and Wetlands Precinct.
Conservation	
The community recognises that the study area has environmental values worth conserving however these need to be balanced with predicted sea level rise, climate change and financial sustainability including the cost to establish and maintain areas of conservation.	This paragraph has been written as though the community qualified its statement on conserving the environmental values about financial sustainability, but it seems The Plans’ authors have inserted the qualifiers. This is disingenuous and puts words in the community’s mouth It also highlights a key inequity of The Plan. Yes, it does money to manage conservation areas but far less than the enormous public subsidies that are proposed to build infrastructure such as roads and boating facilities, which in themselves have an environmental cost that is never accounted for by their proponents. To insist that there must be an economic return from conservation while ignoring the lack of one from, say, boating infrastructure, is unacceptable.

Conclusion: Retain environmental values within the former saltworks/wetlands subject to detailed investigation and feasibility.	<p>Will the 'detailed investigation and feasibility' open the door to major development? feasibility for what? Feasibility framework. Who does investigation?</p> <p>The Plan has said that feasibility and impact analysis has been carried out, although the results have not been made public. Why do another one? And will there be one for the developments proposed for other precincts including boating facilities and marinas?</p> <p>There is no mention of seagrass meadows in this description of the Moolap Planning Area's conservation needs. Yet they occupy a considerable proportion of it and represent some of the largest seagrass areas in Port Phillip Bay.</p>
Port	
Point Henry has good buffers from existing sensitive uses... Conclusion: Do not support a port land use within the study area.	<p>Those buffers will likely be removed by the proposed developments.</p> <p>We agree with the conclusion but also contend that the existing pier should be removed rather than retrofitted at great expense for boating uses.</p>
Industrial land	
Conclusion: Except for Point Henry, retain existing industrial areas for the benefit of Geelong's economy and employment. There is no demonstrated need for more industrial land in the study area.	<p>VNPA agrees that there is no need for more industrial land in the Moolap Planning Area. However, some of the existing operations are detrimental to the amenity of the area, especially along the Point Henry Road, where Winchester Ammunition and Dow Chemicals about the high-water mark, and where Dow has a bunded pond that should be removed.</p> <p>The Industrial Zone should be set well back from the Coastal Foreshore and the companies encouraged to gift some of their land to the community to achieve it.</p> <p>The companies in the Industrial Zone should work with government and the community to landscape their blocks to improve amenity and wildlife connectivity through the area. Stormwater harvesting should be installed to avoid such wastes entering Stingaree Bay.</p>
Marine industry	
Boating facilities are forecast to double in Victoria over the next 35 years, resulting in a projected demand for boat manufacturing and boat related maintenance. Considering the regional demand together with the study area's good access to Corio Bay, a small scale and low impact marine industry could locate in the study area and complement other uses. Conclusion: Small scale and low impact marine industry may be suitable in the study area.	<p>The plan blithely accepts the growth of boating facilities in Victoria. Such growth will present one of the biggest future dangers for the health of Port Phillip Bay in terms of the site impacts of the facilities generally, but also the impact of recreational fishing on targeted fish populations and marine ecosystems. It cannot be considered as 'low-impact'. Corio Bay and the Bellarine Peninsula already has significant numbers of boating facilities. See discussion in section 5.6.</p>
Research	
Conclusion: There is no demonstrated demand for major research facilities in the study area over other locations in Geelong.	<p>There may not be at the moment, but that shouldn't preclude the possibility of research institutions wishing to establish off-campus research facilities in the future in the Saltworks and Wetlands Precinct and the Point Henry Precinct.</p> <p>There is no reference to education activities or facilities. The natural values lend themselves well to environmental education.</p>
Energy production	
Conclusion: There is no demonstrated site suitability for commercial scale energy production. However smaller local energy production may be appropriate in conjunction with other land uses or development.	<p>VNPA agrees that the coastline is inappropriate for wind turbines but sees great potential in medium-scale solar arrays on the rooftops and the grounds of existing and new buildings. With the recent increase in Victoria's solar feed-in tariff, community facilities such as a wetlands discovery centre on Portarlington Road, where saltworks buildings were cleared in 2015, could install solar arrays that provide a significant source of income to run environmental education and ecotourism programs in the wetlands, foreshore and nearshore waters.</p>
Wetlands	
There is a high level of community support for the protection and conservation of the wetlands. Wetlands	<p>With wetlands conservation receiving high levels of community support, and The Plan admitting that they provide many</p>

provide important functions including improving water quality, providing habitat particularly for protected bird species, stormwater retention, and storing excess carbon from the atmosphere. They also have passive recreation potential. Retention of wetlands would be dependent on their environmental importance, adjacent land uses, and response to sea level rise.	important functions, it remains a surprise that their conservation would have to generate an income stream (see above under Conservation).
Conclusion: Retain areas of wetlands and manage environmental values and risks.	It is odd that The Plan separates out conservation and wetlands as separate uses and continues to ignore seagrass meadows. The Plan should have already identified the importance of their environmental values and should stress that more.
Retail and commercial	
Retail and commercial developments...should be of a scale that services local residents and visitors only. Conclusion: Ensure additional retail and commercial development are provided in-line with any increase in residents or visitors to meet the additional need.	If residential development was to occur, then this is a logical conclusion. It is unclear who else the retail and commercial developments would serve other than local residents and visitors, so this may not be a good criterion for determining the scale of the developments.
Coastal inundation	
The Government's preferred strategy is to allow for natural coastal process (coastal retreat) with low lying areas being permanently inundated as this has been found to be more environmentally responsive and cost effective than construction of defence structures. Conclusion: Support coastal retreat as the preferred strategy to predicted sea level rise subject to further investigation due to the complexity of the site.	VNPA agrees that the community must adapt to sea level rise but the reference to coastal retreat as relating to inundation is misleading. That is more adaptation to sea level rise by allowing natural features to absorb those rises. Planned coastal retreat is really about the removal of infrastructure/housing/industry etc. in harm's way or the avoidance of placing infrastructure in harm's way.
Tourism	
There is a need for a substantive increase in visitor accommodation and activities in the Geelong and Bellarine region including contemporary experiential accommodation.	This would appear to be referring to the Greater Geelong & the Bellarine Tourism Development Plan, in which the environment doesn't rate a mention. It's a wish list of major tourism developments without any environmental sensibility. The Plan appears to conflate tourism and recreation but they are two different uses, the latter requiring less infrastructure and largely the pursuit of local residents.
Conclusion: There is an opportunity for tourism facilities that take advantage of the coast and the site's expansive views, and acknowledge the heritage and environmental values. There are opportunities to co-locate tourism accommodation with boating and retail activities in the study area.	Here's that term again, 'taking advantage' in relation to the area's values. But there are other ways that this advantage can be taken, not just the cut and paste of tourism development from a resort developer's prospectus. To 'take advantage of' in this context is to damage the very values they are trying to take advantage of. In the Retail section, retail and commercial development would be tied to residential, here it is being tied to tourism and boating facilities development.
Residential	
The Moolap Plan study area provides potential for additional growth on Geelong's east to take advantage of central Geelong services and the coastal context, and may potentially alleviate some of the growth pressure from the Bellarine Peninsula coastal towns. The most appropriate locations for residential development are areas with low levels of constraints and outside of sensitive locations.	So, The Plan, which is focusing on a relatively small part of the Geelong region, is rewriting the years of planning for growth in that wider area and creating a Geelong growth centre at Point Henry. A growth area would create great pressure on the coastal and do little to alleviate pressure on the other coastal towns—it would accentuate the pressure on the coast that the growth of Geelong is already causing. The Plan states that there is plenty of land but then brings growth back into the centre of Geelong, whereas the broader effort by Geelong's planners is to spread that growth to largely inland areas. But these too will increase pressure on coastal areas e.g. the Armstrong's Creek growth area is already increasing pressure on the Ocean Grove foreshore.
Conclusion: Residential growth in the study area is supported.	This residential area will place great pressure on coast.




Chapter 4 The plan

4.1-4.3 Vision, principles, directions and strategies

The Plan Text	VNPA comment
4.1 Vision	
Point Henry and northern Moolap will transition to a future which benefits the Geelong economy, environment and community by taking advantage of its assets and opportunities while acknowledging its significant industrial, heritage, cultural and environmental values.	Transitioning is a process, not a vision. The vision is the outcome of that process. VNPA's vision is: An internationally important conservation and ecotourism area that is benefitting the Victorian community by protecting migratory birds, improving the health of Corio Bay, reconnecting people with nature and supporting ecologically sustainable coastal land use.
4.2 Principles	
1. Plan for a safe, sustainable, integrated and prosperous community.	1. Plan for a safe, ecologically sustainable, integrated and prosperous community.
4. Prioritise uses that take advantage of the coastal location.	To whose advantage? The coastal location should place constraints on not provide advantages or development. The location has advantages for other uses as well. The Plan focus is through the lens of a coastal developer. There are many problems along the coast because developers have 'taken advantage' of the coastal location in the past. Why repeat these mistakes here? Drop this principle
5. Facilitate increased public access to the coastal foreshore.	5. Effectively manage an expansion of the coastal foreshore and increase public access where appropriate. Increased access should not be the aim here. The first thing is to increase the width and area of the coastal foreshore and conserve its natural heritage.
10. Recognise and respond to areas of heritage and environmental value.	10. Recognise, respect and protect areas of heritage and environmental value.
11. Avoid land use conflicts and manage the transition of existing land uses.	11. Avoid land use conflicts and manage the transition of existing land uses to other uses that are consistent with the Victorian Coastal Strategy and other coastal planning documents.
12. Provide appropriate interfaces to adjoining land uses	12. Pretty similar to 11.
	Add 13. Prioritise protection and conservation of nearshore waters (seagrass meadows), foreshore and wetlands
4.3 Directions and strategies	
The directions and strategies have been specifically drafted to achieve the vision and principles. The directions and strategies are presented in four precincts, shown below, and also for the coastal foreshore that runs across all four precincts. Each of the following sections identifies the precincts current conditions as well as its directions and strategies.	Seagrass meadows are in three of the four precincts, opening them up to damage from developments within the Point Henry and South-east precincts. The foreshore and nearshore waters should be mapped as one separate precinct and marked down for conservation. The other four precincts, without the current inclusion of nearshore waters, are reasonable, but their boundary needs to be set back further from the foreshore.

4.4-4.8 Precincts and Coastal Foreshore

The Moolap plan divides the study area into four precincts and the Coastal Foreshore, briefly describing the current conditions in each before discussing their potential use and then recommending planning directions. This submission reviews the language, terminology and images used to outline the proposed outcomes within the following series of tables.

4.4 Point Henry Precinct	
The Plan Text	VNPA comments
4.4.1 Current conditions	
Seagrass meadows surround the peninsula	Seagrass finally gets a mention in The Plan but more as an aside and is not given any influence over development proposals.
4.4.2 Land use	
<p>The primary direction for the Point Henry Precinct is Tourism and residential.</p> 	<p>Tourism and residential sound somewhat benign but the multi-storey, high-density 'hotels, resorts and other forms of tourist accommodation', along with 'medium to high-density residential development', catering for up to 2,000 permanent residents, and being designated as a new urban growth area for Geelong, is far from benign. Coupled with the proposed housing development for the South-east Precinct, this will extend linear development further along the Bellarine Peninsula and its northern shore.</p> <p>The image to the left, which appears on page 18, indicates that a hard edge to the foreshore, similar to the Geelong waterfront or Docklands in Melbourne, would be supported by The Plan. This would remove natural features of the Point Henry Foreshore Reserve and intensify pressure on the nearshore waters from access, pollution and marinas.</p>
<p>A dedicated tourist attraction may be possible in this precinct however the high amenity, vibrant coastal precinct would be an attraction in itself and provide Geelong with a unique place to live and visit.</p>	<p>The following images are from the Geelong Waterfront (first two), and Wyndham Harbour. They are not very different to what is being proposed for the Point Henry Precinct. So, The Plan will not create something unique, it will simply be like any other intensively developed coastal precinct.</p>    
4.4.3 Built form and urban design	
The future built form and urban design of Point Henry needs to reflect the coastal tourism setting and provide convenient	The Moolap Planning Area currently has no coastal tourism setting. There is a recreation setting. So, a tourism setting is one

access to key features like the waterfront, the Point Henry pier, public open space, future marinas and the coastal foreshore.	that would be artificially created but The Plan reads as though it already exists and that it is the only setting. There is currently a coastal nature setting, a coastal wetlands setting and a coastal recreation setting. Convenient access to marinas (multiples here in this precinct as well as likely in the South-east Precinct) confuses exclusive access with general public access. Marinas are an inequitable use of public land that is also damaging to the local and broader marine environment.
The future built form needs to be sustainable, attractive, comfortable, accessible, and contribute to a safe community.	These are the kinds of words that appear on every developer's brochure these days. It doesn't mean that it will occur. And the word 'sustainable' without any criteria for measurement, is meaningless.
Direction 2: Promote urban design excellence which prioritises pedestrian links, sharing of views, and a diversity of buildings that are attractive, durable and suited to the coastal setting.	Promote siting and design excellence in the use of the Moolap Planning Area. Sharing of views is fine in principle but it won't happen with the development proposed for the precincts.
Ensure precinct planning and built form follows environmentally sustainable development principles and achieves high sustainability outcomes.	Some of the development proposals would fail to meet ESD principles. The buildings might come with 6-star energy ratings, but ESD principles need to be applied to all aspects of the proposed developments in situ but also their broader impacts e.g. marinas and their impact on fish populations in Port Philip Bay.
Ensure a diversity of buildings with a focus on medium to high densities.	There is no explanation in The Plan as to why it favours medium to high density. This would have the greatest impact on the environment.
4.4.4 Transport and infrastructure	
Provide transport and infrastructure to support a sustainable urban environment and medium to high density housing and tourism facilities.	The term 'sustainable' is used frequently in The Plan, without being adequately defined. The housing and tourism facilities may have 6-star energy ratings but that is only a small part of how ecologically sustainable development should be defined. The pressure placed on surrounding environments must be factored in as well.
Facilitate the timely provision and operation of a sustainable public transport and shared path network which connect the Point Henry Precinct with central Geelong and other key locations.	Shared paths hugging the shoreline can be just as bad as coast roads hugging the shoreline. These create management and environmental issues because they provide 'continuous access'. The Plan should encourage more imagination in path alignments so that they don't take up too much public space or take people to sensitive locations. See section 5.8.
Provide a flood free road connection from the Point Henry Precinct to the South-East Precinct and the proposed Geelong Ring Road – Bellarine Link intersection with Portarlington Road.	Agree with flood-free road but must allow water flow beneath. See section 5.5.
Ensure developers provide sufficient land, and carry the full capital cost of providing State and local infrastructure, including community facilities and public open space, using a standard infrastructure contributions plan and supplementary levy.	Does this mean that there will be no public funding used for infrastructure in the Moolap plan?
Identify and protect long term opportunities for the continuation of a road north beyond the Point Henry peninsula.	A plan for a road north of the peninsula along the sand bank to Point Lillias would certainly fail to meet ESD principles. See section 5.7
Facilitate community scale renewable energy technologies in association with urban development.	Agree with renewable energies on buildings and small solar at ground level.
4.4.5 Community facilities and open space	
Directions Facilitate continuous public access along the foreshore with links to public open space, key features, environmental assets and adjacent precincts to create a public open space network.	Continuous public access creates management issues and environmental impacts. See section 5.8. The Plan's provision of marinas will block continuous access by the general public, giving it over to sectional interests. Need to widen foreshore, realign roads and use creative alignments for bicycle and walking paths
Promote the coastal foreshore at the tip of Point Henry as	Only at the tip of Point Henry? Is The Plan suggesting that the foreshore on west and eastern sides will no longer be for public

primary public open space areas.	access or as open space? The image of multi-storey buildings with a hard edge on the water suggests that the foreshore will be severely compromised. This public open space at Point Henry would disappear if the road north of Pt Henry is built.
4.4.6 Environment	
The wetlands play an important role within the precinct by improving water quality, providing water storage, storing excess carbon, providing important habitat for a number of terrestrial and marine species including the bird habitat, and having passive recreation potential.	This section ignores marine areas of the precinct and is largely about contamination and wetlands Coastal retreat is simply a description of a process that is likely to happen if coastal defenses are not installed. It could be confused with planned retreat, which is the removal or avoidance of construction. The various services provided by these natural areas should be compensation enough for the community without the need for them to generate revenue.
4.4.7 Point Henry Pier	
Ensure the future use of the Point Henry pier complements the role and amenity of the tourism and residential direction of the precinct.	Huge cost to retrofit. Who pays? Contributes to issues of coastal retreat by interfering with coastal processes, leading to erosion of the shoreline to the east.
4.4.8 Dependencies	
Prepare an overall plan to co-ordinate the design and development of the Point Henry Precinct.	That's essential, as long as it's not the proposed developments for the precinct in The Plan.

4.5 Industry Precinct	
The Plan Text	VNPA comments
4.5.1 Current conditions	
	Should mention exposed ponds near foreshore Freehold land of this zone abuts high-water mark, thus no public foreshore
4.5.2 Land use	
These industries are not dependent upon the coast but benefit from their relative isolation.	This is the first reference to coastal dependency. Residential or tourist accommodation is not dependent on the coast, nor is industrial use.
Support the continuation of existing industrial operations and the establishment of new industries consistent with Industrial 1 zoning.	The zone boundary needs to be brought back from the foreshore. Need to install water sensitive design, stormwater harvesting etc. to avoid discharges into Stingaree Bay and wetlands.
4.5.3 Built form and urban design	
The Industry Precinct has a low-grade visual appearance due to a combination of mixed industrial uses such as material and recycling and outdoor operators, small lot sizes, and a distinct lack of landscaping. Improve the streetscape and visual amenity along Portarlington Road, Point Henry Road, Hays Road and Buckley Grove.	Agree There is the need for a more efficient use of land around the industrial buildings. Landscaping, wildlife corridors, removal of contaminants and replacement of industries that impact on scenic amenity along Point Henry Road.
4.5.4 Transport and infrastructure	
Direction 10: Provide transport and infrastructure to deliver amenity benefits, improved environmental outcomes for the precinct and attract infill development to the precinct.	Proposed transport projects can also diminish amenity and have environmental impacts.
Support programs that deliver the Geelong Ring Road-Bellarine Link, reticulated sewer network and improved drainage to the precinct.	The link road will now be extended to the Moolap Planning Area. This has environmental implications for Reedy Lake and the Lake Connewarre complex, so it is not without environment impacts and therefore challenges ESD principles and will create greater pressure on the coast by bringing more traffic its way and support the proposed precinct developments The Plan would appear to view the link as critical to the achievement of its aspirations, so the analysis of The Plan against ESD principles needs to take the link's impacts into account.
4.5.5 Community facilities and open space	



Direction 11: Continue to provide recreational opportunities at City of Greater Geelong owned parks.	Agree but limited to two spaces – tennis club and Moolap Reserve
Encourage continuous public foreshore access and links from open space to adjoining areas.	Need to be more creative and look at reconfiguration of allotments, many of which are under-utilised – and see how public open space or corridors can be created.
4.5.6 Environment	
Direction 12 Improve amenity and environmental outcomes including by upgrading infrastructure.	Agree, but infrastructure upgrades must be environmentally friendly.
Require reticulated sewerage programs and improved stormwater drainage that improve the environmental outcomes of the precinct.	Agree. But must remove the pond on the foreshore but work with companies to enable the transfer of some of their land abutting the high-water mark and along foreshore to the crown.

4.6 South-east Precinct	
The Plan Text	VNPA comments
4.6.1 Current conditions	
Seagrass meadows. Shallow bay depths 1-3m	Good to see seagrass meadows get a mention but they should be in a separate precinct to elevate their status in The Plan.
4.6.2 Land use	
Primary direction residential. Residential land use is currently incompatible with existing industries due to the large industrial buffers of up to 2 kms	VNPA cannot support this land use direction. How will industry and residential use become compatible, by changing regulations or changing the industry?
There is no designated time period for residential development and the precinct will require periodic monitoring and review of appropriate buffer and separation distances.	This is very vague. It would be better to leave this out of the plan (retaining Farming Zone) and continue with City of Greater Geelong plans for the area. Focus should be on the Point Henry Precinct, the Industrial Precinct, the Saltworks and Wetlands Precinct, Coastal Foreshore and seagrass meadows.
With the rural land not having significant agricultural values and Geelong having a plentiful supply of comparable industrial zoned land, alternative higher value land uses such as residential may be better suited. A residential land use for the precinct could maximise the use of the land.	But The Plan has already mentioned that there is plenty of available residential land in the region. Other opportunities could include an urban forest.
Its location close to central Geelong provides a future opportunity for a high amenity, sustainable, residential development.	Its proximity to Geelong actually provides the future opportunity for a great new conservation park. An earlier planning document outlined seven scenarios for the Moolap Planning Area. In this case, The Plan has chosen the wrong one and will undermine years of work by planners.
There is an opportunity for Moolap to be the residential growth front on the eastern edge of urban Geelong.	Why does it need growth front on the eastern urban edge of Geelong? There are no such long-term needs with plenty of existing growth areas.
Currently, approximately 25 years supply of residential land is zoned in the Greater Geelong City Council area. Notwithstanding this, an opportunity exists to develop a new residential growth area that is aspirational, responding to long term needs and opportunities	But why, if other growth areas are adequate? Growth areas don't have to occupy all directions of the compass. VNPA believes that the current growth of Geelong requires recreation and conservation areas and rural urban buffers if Geelong's amenity it to be maintained and enhanced.
Locating a residential growth area on the eastern edge of Geelong provides some real benefits to the settlement pattern of the city and region.	These 'real benefits' are unclear. What it will do is undermine the objective of planners to maintain the rural-urban buffer between Geelong and the Bellarine Peninsula.
The coastal context of this precinct may help relieve some of the growth pressures from the coastal towns of the Bellarine Peninsula.	Hardly. What it does do is create a new settlement pressure point along the coast that extends linear development—and will open up calls from developers to extend it further east. Growth should be in the inland areas.
The continued growth of Geelong supports this precinct to become residential when it is compatible with adjacent land uses.	Growth by itself doesn't support anything. It may force land use decisions, and be used by The Pan to support its arguments.
The precinct will be a gateway to Geelong, and also a gateway to Leopold and the Bellarine Peninsula. It will have views and access to wetlands and the coast which will contribute to being an attractive and unique residential location for people to live.	Geelong is growing and growth areas have been designated. Any future growth areas should not be on the coast. There will be a loss of views for those people moving through the Moolap Planning Area. As a flat area, views will only be available to those in multi-storey coastal developments.

Create a high amenity and sustainable residential precinct with convenient access to the coastal foreshore.	Convenient access to the foreshore will place it under increasing pressure because of the plan's development proposals
Provide for a diverse range of housing types and densities including social housing and aged care accommodation, which respond to both a need and demand for housing in this location.	The plan has already demonstrated that there is no 'need and demand for housing in this location'.
Enhance the coastal foreshore with improved access and potential boating facilities.	Boating facilities (and marinas) are not enhancement, they will in fact lead to foreshore and seagrass meadows damage.
At capacity the South-East Precinct has the potential to become home to a large new community.	What is the capacity?
4.6.3 Built form and urban design	
The promotion of residential development in the South-East Precinct should focus on high amenity, sustainable, residential development.	The word sustainable is used frequently in The Plan but without definition.
Provide for a reasonable sharing of views to significant natural and physical landmarks.	What's reasonable? How do you achieve that, especially with 'standard densities', whatever they are? Multi-storey?
4.6.4 Transport and infrastructure	
The future Geelong Ring Road-Bellarine Link could align with a potential new access point to the South-East Precinct. This proposed link to the Geelong Ring Road would facilitate development in the entire study area and result in faster travel times to Melbourne and South-West Victoria.	Would help to have a map of where this link will be in relation to the Moolap Planning Area. The Plan is now presenting the link as critical to development of the Moolap planning Area. What are the environmental implications for the link along its route but also in the planning area?
This infrastructure provision may have implications for areas outside the study area.	Agree. How will The Plan minimise those implications?
Provide transport and infrastructure to create a sustainable urban environment that supports residential communities	VNPA doesn't support the residential proposal for this precinct so
Provide a flood free road connection from the Point Henry precinct to the South-East Precinct and the proposed Geelong Ring Road – Bellarine Link intersection with Portarlington Road.	See section 5.5
Identify and protect long term opportunities for a north – south connection from the Geelong Ring Road– Bellarine Link to the north beyond the Point Henry peninsula.	See section 5.7
	There is no mention of boating facilities under this infrastructure heading but is referred to in the land use directions box.
4.6.5 Community facilities and open space	
Achieving continuous public access along the foreshore, linking to adjacent precincts and key features outside the study area, is a key strategy.	See 5.4 and previous comments about the management issues and environmental impacts associated with 'continuous access'. But VNPA strongly supports the transfer of freehold land to the crown to establish a publicly owned foreshore along the coastal boundary of this precinct.
Ensure sufficient land is contributed by developers for community facilities and public open space purposes.	That should be assumed, but in any rezoning, some freehold land should be transferred to the crown to ensure the Point Henry Foreshore Reserve is extended and widened between Point Henry and Clifton Avenue, and on the western side of Point Henry as well.
4.6.6 Environment	
Ensure that development avoids environmental assets and constraints including the coastal foreshore, the Moolappio re-vegetation site, the wildlife corridor, and wetlands.	Any use of the South-east Precinct should avoid impacting on these assets, along with the seagrass meadows and nearshore waters.
Consider the impacts of coastal erosion when designing waterfront, boardwalks or other coastal facilities.	Coastal facilities and boardwalks were not mentioned in infrastructure. Does this mean that waterfront will be given a hard edge, much like a sea wall, to prevent coastal erosion but while impacting on the shoreline environment? This can be avoided by not placing infrastructure too close to the shoreline.
Consider the role of wetlands to manage the impacts and risks from both stormwater and sea level rise.	Stormwater discharges to the wetlands should be avoided by using water sensitive design and stormwater harvesting.

Ensure any development follows environmentally sustainable development principles and achieves high sustainability outcomes.	What does The Plan consider to be ESD principles in the Moolap context? And what is a high sustainability outcome?
4.6.7 Dependencies	
Realise residential and other sensitive land uses where and when land use conflicts with adjacent industry are resolved.	This ignores the need to resolve issues along the coastal foreshore where currently freehold land abuts the high-water mark in the South-east Precinct.
In the interim, the current Farming Zone should remain, supporting existing and new uses which do not conflict with the adjacent industry uses and do not prejudice the residential future of the area.	VNPA agrees with first part but does not believe the land should ever be turned over to residential.

4.7 Saltworks and Wetlands Precinct	
The Plan Text	VNPA comments
4.6.1 Current conditions	
Seagrass meadows adjacent to coast	The seagrass meadows occupy close to 50% of this precinct but receive just a one-line mention. This is inadequate.
4.6.2 Land use	
Low impact water, heritage and nature based tourism and commercial facilities Recreation areas and public access	No specific mention of canal estate. Is it out or in?
Any future use of this precinct including any future tourism development proposals, needs to comply with the policies and actions of the <i>Victorian Coastal Strategy</i> , as well as applicable environmental and planning legislation and policy.	This is the first reference to the Victorian Coastal Strategy. It should be front and centre for each of the precincts.
A precautionary approach to the coast allowing natural coastal processes (coastal retreat) to take place would reduce the cost of intervention and ongoing maintenance and allow the coastal ecosystem to continue to provide a broad range of benefits.	It could, but a precautionary approach should also be used when considering the development of the other precincts as well.
Protect the coastal ecosystem whilst allowing it to provide a broad range of benefits allowing opportunities for small scale tourism and commercial facilities where appropriate.	The Plan presumes that small-scale tourism and commercial facilities are environmentally benign. The appropriate location for infrastructure of this kind would be along access roads e.g. Portarlinton Road and Point Henry Road, not within the wetlands themselves.
Support a diversity of passive or active recreational activities.	A passive recreation area is generally an undeveloped space or environmentally sensitive area that requires minimal development. Active recreation includes recreational activities, such as organized sports, playground activities, and the use of motorized vehicles, that require extensive facilities or development or that have a considerable environmental impact on the recreational site. Active recreation is completely inappropriate in this precinct
The Crown owned part of this precinct is a large site and the ongoing management and operation would have financial implications. It is important that some modest financial returns for the sustainable management of the land be captured.	No, the wetlands provide many community benefits and those should be sufficient to support their management costs.
4.6.3 Built form and urban design	
Establish appropriate built form and design which can withstand a permanent or temporary hazard event.	Building and other infrastructure should be sited to avoid hazards or, in the case of boardwalks and viewing platforms, be designed to allow rising waters to flow underneath. The photo opposite is an odd choice to illustrate The Plan's point as it would be at extreme risk of inundation in the Moolap context. A wetlands discovery centre and associated buildings could be located on the flat ground along Portarlinton Road where six former saltworks buildings were removed in 2015.

	
4.6.4 Transport and infrastructure	
<p>Ensure developers carry the full capital cost of providing necessary infrastructure to service any proposed development.</p>	<p>The use of the word ‘developers’ and ‘development’ would suggest that the Plan has projects in mind that are more than just small scale and sustainable.</p>
<p>Coordinate drainage works within the Saltworks and Wetlands Precinct and adjacent precincts to deliver improved environmental outcomes.</p>	<p>Drainage, sewerage and stormwater networks should be designed to avoid discharge or seepage into the wetlands and Stingaree Bay. There should be no stormwater outlets along the shoreline of the Moolap Planning Area</p>
<p>Direction 21 - Transport and Infrastructure Facilitate infrastructure programs which would benefit both the Saltworks and Wetlands Precinct and areas outside this precinct.</p>	<p>Agree, but must be of a scale, design and alignment that protects the environmental values of the wetlands and other precincts</p>
4.6.5 Community facilities and open space	
<p>Continuous public coastal access should be provided although its location may be dependent upon environmental values, heritage considerations and any response to sea level rise.</p>	<p>The frequent use of the term ‘continuous public access’ in The Plan in relation to coastal crown land is belying the fact that environmental and management constraints should limit access in some areas. Access to the Saltworks and Wetlands Precinct should be for passive recreational activities and in areas that are less sensitive to damage.</p>
<p>Encourage linear and coastal open spaces, including continuous public coastal access, through the former saltworks which link Eastern Park to the Point Henry Precinct, South East Precinct and other open space.</p> 	<p>This sounds like a shared pathway should be provided along the shoreline linking Geelong to Point Henry and beyond. This would disturb wildlife in some areas and also occupy a considerable area in the narrow strip of public land. The image opposite illustrates this. See section 5.8 for further discussion.</p>
<p>Direction 22 - Community Facilities and Open Space Provide sensitively designed pedestrian corridors through the Saltworks and Wetlands Precinct for passive and active education and recreation purposes.</p>	<p>Agree that the corridors should be sensitively designed and located but should only be for passive, not active recreation</p>
4.6.6 Environment	
<p>Direction 23 - Environment Support development, works or uses which improve the environmental values of the former saltworks and wetlands.</p>	<p>Agree, but development should be on the land along Portarlington Road where buildings were removed in 2015. Works should include the installation of technology to regulate water levels to enhance the habitat for birdlife. Parks Victoria</p>

	does this at the former saltworks at the Cheetham Wetlands at Point Cook.
4.6.7 Dependencies	
Allowing some modest financial return through low impact tourism and commercial facilities has genuine merit where it leads to improved environmental outcomes. However the broader implications on heritage and environmental values and risks would need to be carefully considered during the detailed strategic planning of these areas.	The conservation of wetlands does cost money, but far more public money is spent on road, car parking and other infrastructure and on the perverse subsidies to boating facilities, the construction and use of which have direct impacts on seagrass meadows and fish populations in the bay.
The environmental and infrastructure needs of this precinct also need to be considered in conjunction with the detailed planning and development of adjacent precincts.	The environmental impacts on this precinct from the proposed development of adjacent precincts must also be considered. The scale of the development in the Point Henry and South-east Precincts, and any intensification of use in the Industrial Precinct, would place considerable pressure on the Saltworks and Wetlands Precinct, Coastal Foreshore and seagrass meadows.

4.8 Coastal Foreshore	
The Plan Text	VNPA comments
Direction 25 - Coastal Foreshore Facilitate the acquisition or contribution of coastal foreshore from private land owners to provide continuous Crown coastal foreshore from the CSIRO to Clifton Ave and improve connectivity, access and integration.	VNPA wholeheartedly agrees, but The Plan needs to ensure there is genuine public access that is ecologically sustainable, not given over to exclusive use by small sections of the community
Protect and enhance the foreshore as a primary open space area and utilise it as a tourist and leisure destination.	The use of the term open space conjures up parks and gardens. It should have a primary use of conservation with access for passive recreation in selected areas.
Where appropriate, encourage new waterfront development and boating facilities which improves public access to the water.	Waterfront development and boating facilities destroy foreshore and seagrasses and reduce access to the general public, giving exclusive access to boat owners and owners of waterfront properties. The Plan is conflating exclusive access and public access. This development does not improve public access, it takes public access away

Chapter 5 Summary

The Plan Text	VNPA comments
The draft Moolap Plan proposes an exciting new land use direction enabling transitioning and revitalisation to benefit the whole region.	No, it does not. It resembles any coastal developer's dream and mirrors Geelong waterfront, Wyndham Harbour, Docklands and other precincts around Port Phillip Bay. It's dull and unimaginative.
It presents a unique opportunity to create a major new suburb that significantly contributes to Geelong's ongoing evolution as a vibrant regional city.	If there is a need for a major new suburb of Geelong, it should not be in the Moolap Planning Area. Growth areas are already identified.
It integrates climate change into land use planning, and underpins the creation of a sustainable community based upon Environmentally Sustainable Development (ESD) principles	The Plan should list the ESD principles and how they will be satisfied by the proposed developments. Otherwise it is simply paying lip service. For climate change, all it mentions is that it will allow the wetlands to be inundated in a confused interpretation of 'coastal retreat', while recommending the construction of new infrastructure on the foreshore and in nearshore waters that will be impacted by rising sea levels.
distinctive high amenity residential development that is focused on the coast and provides diverse housing opportunities	The residential development should not be focused on the coast. That's a recipe for linear coastal development which is inconsistent with the Victorian Coastal Strategy.
a signature new urban area at Point Henry with a mix of tourism and residential offerings that will be different to anything else in the Geelong region.	It is no different to the Geelong waterfront, Wyndham Harbour and others places around Port Phillip Bay. There is no need for a signature new urban area (see 5.2.) To build it in the Moolap Planning Area is inconsistent with the Victorian Coastal Strategy.

new and enhanced connections to the water, including continuous coastal access and recreation and boating facilities	The first part of this sentence is contradicted by the second. You cannot have continuous coastal access for the general public if public land is given over to the exclusive interests of the boating sector, which restricts movements of walkers and cyclists along the coast. They also take up huge space in terms of car parking and other facilities to service marinas and boating facilities.
industrial areas that are thriving, have improved amenity, environments and infrastructure, and are providing required services and jobs.	The industrial area already provides this but there are certainly improvements that can be made and the environmental footprint reduced.

Chapter 6 Potential Implementation Framework

Short-term: within 10 years	
The Plan Text	VNPA comments
Planning Scheme Amendments	
Prepare a planning scheme amendment to the Greater Geelong Planning Scheme to introduce relevant policy and give effect to the approved Moolap Plan. The amendment could include the Moolap Plan as a reference document and a Moolap section within the Local Planning Policy Framework of the Greater Geelong Planning Scheme outlining the Vision, Principles and Directions as contained in the Moolap Plan.	VNPA acknowledges and accepts the planning amendment process outlined but does not support the draft plan being incorporated into the local planning framework without major changes as outlined in this submission. Nor do we support the zoning amendments for the Point Henry Precinct and the Saltworks and Wetlands Precinct. The PPRZ for the crown land in the Saltworks and Wetlands Precinct should be zoned PCRZ, and this should eventually be applied to the land currently owned by Ridley Corporation and Alcoa once that has been transferred to the crown either through negotiated purchase or a donation by the landowner. The annotations on the proposed zoning map do not indicate that where the proposed Special Use Zone covers Alcoa land, that will require a change of zoning from Industrial Zone to Special Use Zone. The current PCRZ for the seagrass meadows and nearshore waters (in the City of Greater Geelong Planning Scheme) is appropriate and should be retained (it is not identified on the map and should be – a note at the bottom is inadequate), as should the PCRZ for the Coastal Foreshore. When the Coastal Foreshore is widened after the securing of coastal freehold land abutting the high-water mark, the PCRZ should be extended to that new crown land.
Point Henry Precinct	
Rezoning from Industrial 1 Zone to Urban Growth Zone	VNPA does not support the prime land use direction of residential and tourism for this precinct. There is no mention of the need for consistency with the Victorian Coastal Strategy
Saltworks and wetlands Precinct	
Freehold land New Special Use Zone Schedule	There is a need for more clarity on what The Plan thinks is appropriate under this schedule. VNPA believes that this land should eventually be transferred to the crown, either through negotiated purchase or a donation by the landowner, and then zoned PCRZ.
Crown land Rezoning from Special Use Zone Schedule 1 (environmental wetlands, salt production and land-based aquaculture activities) to Public Park and Recreation Zone.	PPRZ is the wrong zone for the wetlands. The prime focus should be on conservation and not limit it by using the term 'where appropriate'. Any recreation should be passive, not active.
Overlay controls	
1. Review the Design and Development Overlay Schedule 20 (DDO20) and its application to improve the visual appearance, level of amenity and stormwater treatment. Remove the DDO20 from industrial areas as part of a rezoning to an alternative land use in the Point Henry and the Saltworks and Wetlands Precinct. 2. Review existing overlays, including their extent and	VNPA agree that the DDO20 will need reviewing and removal from the Alcoa-owned wetlands adjoining the Industrial Precinct (which should eventually be zoned PCRZ). The Heritage Overlay and Environmental Significance Overlay (ESO) should be retained. The ESO should be extended to include all seagrass meadows in the nearshore waters (only contains part of those in Stingaree Bay and none surrounding Point Henry).

<p>need, considering any completed site investigation, detailed strategic planning, master planning and zone changes, and to consolidate planning controls.</p> <p>3. Consider the application of an Environment Audit Overlay to ensure any potentially contaminated land is suitable for a use which could be significantly adversely affected by any contamination.</p>	<p>The Special Building Overlay covering parts of the Saltworks and Wetlands Precinct should also be reviewed, with a view to prohibiting buildings in that area.</p>
Geelong Ring Road extension: Bellarine Link	
<p>6. Identify the preferred corridor for the Geelong Ring Road Extension– Bellarine Link and the connection with Portarlington Road and the South-East Precinct.</p>	<p>Based on The Plan, it would appear that this road extension is integral to the development aspirations. Therefore, the environmental impacts of this extension along the edge of Reedy Lake and into the Moolap Planning Area should be assessed, quantified and included in assessment of The Plan's alignment with ESD principles.</p>
Strategic planning for the former saltworks and wetlands	
<p>These plans give effect to the Vision, Principles, Directions and Strategies of the Moolap Plan, and include:</p> <ul style="list-style-type: none"> the ongoing responsibility for maintenance and management of the saltworks revenue sources to contribute to the cost of managing the former saltworks and wetlands and the construction of any coastal protection measures opportunities for eco-tourism and complementary commercial facilities appropriate measures to respond to the potential impacts of sea level rise on public assets and existing urban areas of Moolap opportunities for recreation, public access and community facilities options to improve the drainage situation for the former saltworks and wetlands, that may also have positive impacts for the urban areas of Moolap appropriate interface treatments with other precincts compliance with the policies and actions of the <i>Victorian Coastal Strategy 2014</i> and the policy objectives of the Victoria Planning Provisions an adequate management response to environmental values such as native vegetation, potential acid sulphate soils and migratory birds and necessary assessment and approvals that may be required for development proposals in accordance with the <i>Environment Protection and Biodiversity Conservation Act 1999</i>, the <i>Environment Effects Act 1978</i>, the <i>Coastal Management Act 1995</i> and the <i>Flora and Fauna Guarantee Act 1988</i> an adequate response to Aboriginal and heritage values and the necessary approvals in accordance with the <i>Heritage Act 1995</i>, the <i>Aboriginal Heritage Act 2006</i> and the Greater Geelong Planning Scheme. 	<p>There has been plenty of strategic planning directed at the precinct through the City of Greater Geelong, the objectives of which are to conserve the wetlands. What is urgently needed is a master plan and a management plan for the wetlands and saltworks e.g. management of water levels to sustain this critical habitat for migratory and resident birds. Conservation of the area, not recreation and tourism, should be the focus of future planning and management. The surrender of the lease covering the crown land component of the wetlands and saltworks is vital if the master and management plans are to be effective in this time frame.</p> <p>It is pleasing to see a reference to compliance with the Victorian Coastal Strategy, but there is no reference to it in relation to the other precincts.</p> <p>VNPA supports each of these dot points except for those on revenue raising and commercial facilities. Why The Plan's obsession with raising revenue from the wetlands and the associated need for commercial facilities? How will the cost of installing and managing boating infrastructure, the building of roads and other infrastructure be recouped?</p>
Precinct structure plan: Point Henry Precinct	
<p>The PSP will give effect to the Vision, Principles, Directions and Strategies of the Moolap Plan. It will be the mechanism to investigate and implement, and include:</p> <ul style="list-style-type: none"> identifying and protecting a long term opportunity for the continuation of a road north beyond the Point Henry peninsula. identifying and calculating the cost of necessary State or Local Government owned infrastructure. planning the future land use options of the Point Henry pier. determining the size and type of interface treatments 	<p>Precinct Structure Plans are required for sites zoned as Urban Growth Areas. In theory, such a precinct plan could exclude major residential and tourism development in favour of a mix of parks, recreation areas, low-impact ecotourism facilities, civic buildings, museums etc. Based on the aspirations of The Plan, this is unlikely in practice. Therefore, VNPA does not support the proposed urban growth zone, instead suggesting a mix of zones to cater for more diverse land use outcomes with less impact on the environmental and social amenity of the Point Henry Precinct.</p> <p>Will this have a 'modest return' that is 'of merit' from the public</p>

<p>between the South-East Precinct and the rural land; and the South-East Precinct and Portarlington Road.</p> <ul style="list-style-type: none"> undertaking an environmental audit to determine the suitability of sensitive land uses on former industrial land and informing the degree of remediation works required. 	<p>investment in infrastructure, as is expected to cover wetlands management?</p> <p>What is meant by land use options for the Point Henry pier. Again, who will pay for any retention and retrofitting and the management of its use. Will charges for its use completely cover the cost of that management and retrofitting</p>
Existing infrastructure assets	
Review infrastructure requirements across the study area, including for the gas pipelines and transmission lines, in consultation with relevant authorities and service providers.	There needs to be an environmental and benefit-cost audit of all infrastructure assets.
Residential: South-east Precinct	
<p>Retain Farming Zone until residential development is compatible with adjacent land uses</p> <p>In consultation with industry, identify to the satisfaction of Government (particularly the EPA), the actual separation distances required, including any potential reduction in standard distances through the preparation of an evidence based analysis of separation distances from existing industrial operators to potential sensitive land uses within the South-East Precinct. This will need to consider the industrial operations, environmental conditions and the degree and likelihood of any impacts associated with risks to amenity and safety of future residents together with potential impacts on industry.</p> <p>Consider the planning controls including zones and overlays to reflect any change in separation distances and a residential land use where land use conflict has been resolved.</p>	<p>VNPA agrees that the South-east Precinct should retain its Farming Zone but, as outlined in section 5.3, projects to improve vegetation cover and establish biolinks should be encouraged. Residential development in the future should be ruled out.</p>
Reticulated Sewer Extension and Stormwater Drainage Improvements	
16. Investigate opportunities for the provision of reticulated sewerage and improved stormwater drainage to the South-East Precinct to support improved environmental management and infill opportunities.	VNPA agrees that such improvements to sewerage and drainage infrastructure should be implemented. But water sensitive design should be established in the industrial Precinct and elsewhere to enable stormwater outlets to be removed from Stingaree Bay.
Portarlington Gateway	
17. Improve the visual amenity and streetscape along Portarlington Road and within the Industry Precinct.	VNPA supports this but the term 'gateway' is something of an artifice.
Point Henry pier	
Investigate the opportunity to reuse the Point Henry pier in association with the tourism and residential direction for Point Henry.	VNPA stands by its proposal from the first submission that the Point Henry pier be dismantled.

Medium term: 10-20 years	
The Plan Text	VNPA comments
Responsibility: State Government	
<p>Deliver, review and update as required the precinct structure plan for the Point Henry Precinct and other detailed strategic planning (including masterplans), informed by the delivery of staging, infrastructure and land use transition.</p> <p>Engage with land and asset owners, residents, businesses, recreation users, land managers, interest groups and visitors to understand issues that may be influencing the orderly delivery of the Moolap Plan.</p>	<p>A sensible process, as long as The Plan being implemented is very different to the current draft.</p>
Responsibility: State Government/City of Greater Geelong	
<p>Monitor and review as required the policies, zones and overlays in the Greater Geelong Planning Scheme that apply to the study area, to ensure they are facilitating desired outcomes.</p> <p>Review and revise the Moolap Coastal Strategic Framework Plan as necessary.</p>	<p>A sensible process, as long as The Plan being implemented is very different to the current draft.</p>