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Phillip Island Conservation Society Submission: Draft Bass Coast Distinctive Area and Landscape Statement of Planning Policy and Landscape Planning Controls

Introduction

Phillip Island Conservation Society (PICS) was formed in 1968—one of the first grass-roots conservation societies in the nation—with the mantra “save wildlife today for tomorrow”. PICS guiding principles have ensured that we continue to be a voice for the preservation and enhancement of the terrestrial and marine environments of the Phillip Island and Western Port region.

We acknowledge and pay respect to the region’s first people, the Bunurong, who are the Traditional Custodians of these lands and waters.

Vision for Bass Coast

PICS strongly supports the draft Bass Coast Distinctive Area and Landscape Statement of Planning Policy (DAL SPP) 50-year vision, particularly its emphasis on increasing native vegetation cover, protecting remnant vegetation from clearing and fragmentation, and protecting habitat and biodiversity. We also commend the focus on:

- Bunurong cultural heritage.
- Climate mitigation, adaptation, and net-zero emissions.
- Sustainable economic development based on renewable energy and environmentally conscious tourism, agricultural, and natural resources practices.
- Integrated, strategic planning for infrastructure, including investment in public and active transport, and waste reduction, reuse, and recycling.
- Use of protected settlement boundaries to maintain and enhance green breaks and respect the qualities of distinctive landscapes.

Urgent need to protect remnant vegetation

If we are to realise the DAL SPP vision for Bass Coast, we must urgently prioritise the protection of remnant vegetation. The habitat value of old-growth vegetation cannot be replaced by offsets, and economic development is simply not environmentally sustainable where it results in destruction of remnant vegetation.

We wish to emphasise how little remnant vegetation is left within Bass Coast Shire. Less than 10 per cent of pre-1700 indigenous vegetation remains within Bass Coast, more than 10 ecological vegetation classes are endangered, three are vulnerable, and three are severely depleted¹.

Despite existing policies and planning controls designed to conserve this rare and valuable natural resource, remnant vegetation in Bass Coast Shire is still being destroyed at an alarming rate where there is conflict with other land uses. The Bass Coast DAL SPP and landscape planning controls are an opportunity to arrest this decline.

Recommendations

Drawing on the comments above and more than five decades of experience in planning to preserve and enhance our environment, PICS recommends the following changes to the draft Bass Coast DAL SPP and landscape planning controls. Recommended changes to the wording of policy objectives and strategies are highlighted in green and words to be removed are struck through.

Policy domains

Landscape policy

Objective 3: To protect and enhance the declared area's significant landscapes and seascapes, including their distinctive characters, physical features, remnant vegetation, and cultural values.

Strategy 3.4: Additional dot point

- avoids excessive earthworks, such as mounding, to preserve natural contours, hydrology, and viewlines

Strategy 3.6: Additional dot points

- minimising additional noise and light pollution
- drafting Fly Neighbourly guidelines to protect amenity and biodiversity at relevant locations

Environment and biodiversity policy

Objective 4a: To conserve and enhance the declared area's biodiversity and associated ecosystem services by retaining and protecting remnant vegetation and connecting biolinks, and increasing the quality and quantity of habitat, particularly for endangered and vulnerable indigenous plant and animal species.

Objective 4b: To protect and enhance the health and function of the declared area's integrated water system, in particular, groundwater, waterways, significant wetlands, and intertidal and marine environs.

Objective 4c: To minimise human impacts and the effects of industrial and urban development on the declared area's environmental and ecological values.

Additional strategy 4c.#: Ensure that sensitive biodiversity and environments are protected from noise and light pollution when assessing proposed developments, including, where applicable, through:

- application of the *National Light Pollution Guidelines for Wildlife Including Marine Turtles, Seabirds and Migratory Shorebirds* (Commonwealth Department of Environment and Energy 2020)
- drafting Fly Neighbourly advice.

¹ [Natural Environment Strategy 2016 to 2026, Bass Coast Shire Council](#)

Sustainable economic development policy

Objective 6b: To facilitate a diverse, resilient, circular economy that promotes innovation in the productive use of rural land, natural resources and value-adding activities, while retaining and protecting remnant vegetation and connecting biolinks.

Strategy 6b.1 Protect and manage extractive resource areas from encroachment by incompatible land uses and inappropriate development, while also protecting remnant vegetation and connecting biolinks from encroachment by extractive industries.

Strategy 6b.2 Ensure proposals to establish extractive industries adhere to best practice measures to avoid and minimise impacts on the declared area's attributes, and ensure locations of lesser environmental and landscape significance are prioritised. extractive industries do not impact upon areas of environmental or landscape significance.

Additional strategy 6b.#: Phase out existing sand extraction from the Western Port Woodlands remnant vegetation and biolinks—no expansion or extension of existing work authorities or planning permits, and no new work authorities or planning permits. (See further discussion below.)

Strategic infrastructure policy

Objective 7: To ensure the integrated and timely provision of transport, essential services and community infrastructure that meets community needs and increases resilience to natural hazard and climate change impacts, while minimising impacts on landscape, environmental and Aboriginal cultural heritage and historic heritage values.

Settlements policy

Protected boundaries

PICS strongly supports the protected settlement boundaries proposed for Phillip Island.

Planning zoning in areas beyond protected settlement boundaries must not be relaxed to allow subdivision or development that is incompatible with landscape and biodiversity values.

Hierarchy

PICS requests that Newhaven is separated from San Remo for the purposes of the settlement hierarchy. San Remo clearly fits the description of a district town, while Newhaven is a village with its own character.

Coastal settlement preferred character and seascapes

Phillip Island's beaches, foreshore reserves, and adjacent settlement zones are a frequent setting for planning conflicts regarding vegetation removal and the appropriateness, location, design, height, and placement of buildings and infrastructure. Conflicts often involve impacts on the seascape and views from the beach and foreshore—for example, where proposed buildings would be seen above foreshore vegetation. The Marine and Coastal Policy places value on preserving both seascape and landscape.

PICS recommends that the need to preserve the seascape and views from the beach and foreshore is reflected in the preferred character statements for all coastal settlements and related planning provisions.

Objectives and strategies

Objective 8: To plan and manage the sustainable development of settlements in the declared area consistent with each settlement's unique character, role and function, and the protection and

enhancement of the area's landscape **and seascape** significance, environmental and biodiversity values, Bunurong cultural heritage and historic heritage values.

Strategy 8.5: Ensure development at the periphery of settlements is designed to transition to the surrounding landscapes, integrating development with its environs, landscape **and seascape** character and features, subject to addressing bushfire risks.

Strategy 8.6: Ensure development in settlements maintains and enhances views of the rural hinterland, **and to and from** the coast and foreshore.

Proposed landscape planning controls

Land reserved for public use, including beaches and foreshore reserves

PICS understands that DELWP will work with relevant Responsible Public Entities and stakeholders to amend landscape protections for public land once the Bass Coast DAL SPP is finalised, and that this will be consistent with relevant legislation, policy, and planning provisions.

As a community stakeholder, PICS seeks engagement in this process, particularly regarding the management of Phillip Island's beaches and foreshore reserves.

Significant Landscape Overlay 1: Bass Hills, Bass River Valley and Coastal Plains

PICS strongly supports the proposed SLO1 and recommends one extension to its western boundary near Bass.

When travelling on Phillip Island Road between San Remo and Bass, the vista from the elevated road extends across the coastal plain to the mouth and delta of the Bass River, to Reef Island and beyond. This section of coastline is important roosting and foraging habitat for birds using the Western Port Ramsar wetland.

PICS suggests extending the proposed boundary of SLO1 from the Phillip Island Road and the adjoining Bass Highway north-east to the coast, Bass River, and Reef Island and Bass River Mouth Nature Conservation Reserve. This would protect the vista and minimise development that is likely to disturb waterbirds.

Significant Landscape Overlay 2: Phillip Island Western and Southern Coast

PICS strongly supports the proposed SLO2.

Significant Landscape Overlay 3: Phillip Island and Swan Bay Coast and Churchill Island

PICS strongly supports the proposed SLO3 and recommends one extension to its western boundary near Cowes.

The undeveloped land bounded by Coghlan Road, Rhyll Road, and the southern section of the Cowes golf course is subject to inundation and may include acid sulphate soils. It floods in the wet season, providing feeding habitat for Black Swans and other waterfowl, drains into the Ramsar wetland environment of Rhyll Inlet, and is part of the vista towards Western Port from the Cowes-Rhyll Road corridor and Oswin Roberts Reserve.

PICS recommends that the SLO3 boundary is expanded slightly west to Coghlan Road to align with the proposed eastern protected settlement boundary of Cowes.

SLO permit requirements

PICS considers that it is an impractical and unnecessary restriction to require a permit to install a typical farm fence. Unpainted and non-solid farm fences made from timber, steel, or wire should not

require a permit. However, decorative or solid fences made of brick, stone, or Colorbond should require a permit.

PICS supports the permit requirements for the siting and design of farm buildings.

PICS does not support the permit requirement for the removal of exotic tree rows or exotic shelterbelts. This is an impractical and unnecessary restriction on farm vegetation maintenance and replacement of exotic species with native species.

The Western Port Woodlands—our last significant remnant forest

Earlier we discussed the imperative to protect remnant vegetation from further destruction. We will now turn to the largest and most urgent example of this loss within the Bass Coast Shire, the Western Port Woodlands, and make five recommendations regarding the Bass Coast DAL SPP and proposed landscape planning controls.

The Western Port Woodlands is the local community's name for the forest corridor of conservation reserves and connecting remnant vegetation on public and private land stretching along the coast and hinterland between Lang Lang and Bass. The corridor includes Grantville Nature Conservation Reserve, Grantville Bushland Reserve, The Gurdies Nature Conservation Reserve, Hurdy Gurdy Nature Conservation Reserve, the privately owned Vinfast land (formerly Holden Proving Ground), Adams Creek Nature Conservation Reserve, and the remnant vegetation forming biolinks between these high-conservation-value areas.

The woodlands are loved by the community for their environmental, biodiversity, and landscape values, and as special places to walk in nature. They are a rare and precious landscape in the highly cleared Bass Coast Shire—the last significant remnant forest. They support ecological vegetation communities listed as endangered in the Gippsland Plains Bioregion, as well as EPBC-listed and FFG-listed flora, fauna and fungus species².

In the highly cleared Western Port catchment, the woodlands provide important filtration of runoff and groundwater flows into the Western Port Ramsar wetland ecosystem. To use a metaphor shared with PICS by a knowledgeable community member, Western Port has lost its liver—the Koo Wee Rup Swamp—and a kidney—the bushland that once existed around Cranbourne. The Western Port Woodlands form the critical remaining kidney.

Unfortunately, the entire Western Port Woodlands corridor is under threat from sand extraction. Extractive Industry Interest Areas cover much of the high-conservation-value remnant vegetation and connecting biolinks.

There are currently 10 sand mines operating in the Western Port Woodlands, and five are in nature conservation reserves (NCR)—The Gurdies NCR, Grantville NCR, and Adams Creek NCR. There are plans to expand extraction substantially, with 19 current extractive industry work authorities within the woodlands and another seven under application.

In addition to the loss of remnant woodland, sand processing operations have potential to pollute waterways and groundwater flowing into the Western Port Ramsar ecosystem with highly toxic chemicals³.

² [Western Port Woodlands: Wildlife corridor or sand pit?](#) Victorian National Parks Association, August 2021.

³ [Potential environmental impacts of chemical pollutants released at the proposed new Grantville sand mining and processing site.](#) Prof Dick Wettenhall, June 2021

The draft DAL SPP describes Bass Coast as a critical supply area for construction sand (p. 65), while failing to acknowledge that Victoria has substantial sand supplies that can be extracted without loss of high-conservation-value woodland. The draft DAL SPP describes sand extraction as a temporary land use for which rehabilitation of the landscape is possible to the extent that it can provide net community benefit. It states that proponents of extraction should be *encouraged* to locate in areas of lesser environmental significance.

PICS argues that there is nothing temporary about destroying a high-conservation-value woodland corridor, digging enormous pits that extend below the water table, and processing sand with toxic chemicals above a Ramsar wetland of international significance. The damage is irreversible, and it cannot be rehabilitated to provide net community benefit. Proponents should be *required, not encouraged*, to locate in areas of lesser environmental significance.

For these reasons, PICS considers that the entire Western Port Woodlands corridor should be protected and enhanced for current and future generations, and we support community group Save Western Port Woodlands in its effort to achieve this. PICS members were among the almost 4,000 people to sign electronic and paper petitions to the Victorian Parliament by Save Western Port Woodlands, requesting *“an immediate moratorium on sand mining work authorities to ensure no further expansion of mines operating in this fragile forest corridor and to ensure all existing remnant forest is protected from removal”*.

Recommendations relating to the Western Port Woodlands

Therefore, regarding the draft Bass Coast DAL SPP and proposed landscape planning controls, PICS makes the following recommendations:

1. List the Western Port Woodlands corridor among the attributes qualifying the Bass Coast declared area as a distinctive area and landscape (see Table 1 , DAL SPP, p. 2)—both as an area of outstanding environmental significance and a significant geographical feature in the landscape.
2. Declare a Significant Landscape Overlay to protect the Western Port Woodlands corridor (including public and private land) in recognition of its bioregional conservation and landscape significance, value to the community, and importance to the Bass Coast Shire’s heavily nature-based tourism economy.
3. Declare an Environmental Significance Overlay to protect high-conservation-value remnant vegetation and biolinks within the Western Port Woodland corridor, to maintain connectivity and conserve biodiversity.
4. Exclude Western Port Woodlands high-conservation-value remnant vegetation and connecting biolinks from the Extractive Industry Interest Areas defined in the Bass Coast DAL SPP Map 10 (p. 68).
5. Phase out existing sand extraction from the Western Port Woodlands remnant vegetation and biolinks—no expansion or extension of existing work authorities or planning permits, and no new work authorities or planning permits. (See recommended additional strategy 6b.# above.)

Summary

Thank you for the opportunity to engage in the development of the Bass Coast Distinctive Area and Landscape statement of planning policy and landscape planning controls. If you have any questions regarding this submission, please contact us at phillipislandconservation@gmail.com or via the contact details provided via the online submission process. PICS looks forward to further engagement as a community stakeholder during the upcoming work to amend landscape protections for public land.