



SUBMISSION ON THE DRAFT CENTRAL REGIONAL COASTAL PLAN By ACS Victorian Branch

The Australian Coastal Society (ACS) Victorian Branch appreciates the opportunity to comment on the draft Central Regional Coastal Plan.

The Australian Coastal Society's key aims as "A Voice for the Coast": are to promote healthy coastal ecosystems, support vibrant communities and ensure the sustainable use of coastal resources.

Please find below our comments and recommendations:

ACS Victoria strongly supports the concept of regional coastal plans to provide a regional interpretation of the Victorian Coastal Strategy (VCS) and guide its implementation in particular areas. We also note the critical inclusion of the Hierarchy of Principles which give effect to the directions in the *Coastal Management Act 1995*.

We also acknowledge and support the important reference to Integrated Coastal Zone Management, [ICZM] and its interpretation.

Legislative requirements under the *Coastal Management Act 1995*: [The Act]

We note the excellent references in the Chair's Foreword and within the Introduction which establishes the legal framework and context for this Plan.

[a] However, without being pedantic, it is our understanding that the requirements for a Coastal Action Plan, [CAP] as specified in The Act require the word "Action" to be included. We note that this is not incorporated within the Plan's title.

Comment: **We recommend that the word, "Action" be added to the title.**

[b] The Plan Introduction section [1.1] states the four specific actions that will occur under The Act but does not specifically mention that it "identifies strategic directions for use and development, or detailed planning of the region, or part of the region" as required under Section 23 of the Act. If there is uncertainty in relation to whether the Plan meets the requirements of the Act, then it would be difficult to successfully rely on it at Panel or VCAT.

Comment: **If this Regional Plan is to succeed current Coastal Action Plans and provide a robust direction for coastal planning and management, the specific inclusion of words on "identifying strategic direction for use and development, or detailed planning of the region, or part of the region" need to occur.**

[c] There is an assumption of legislative change to Coastal Action Plans [CAPS] and Coastal Management Plans [CMP] within the Plan. It presumes that the CMP will have a greater role beyond coastal Crown land but no- one really knows whether that will be reflected in new legislation. We note the paragraph [1.2], referring to previous Coastal Action Plans and how they may be used in the future. We note that these may transition to Coastal Management Plans where needed.

Comment: **We recommend that this issue be noted and actions identified to reduce a transitional planning risk where gaps in policy documents could occur.**

Interpreting the Victorian Coastal Strategy.

Comment: **We strongly support the reference to sea level rise benchmarks as noted in the**

VCS and Victorian Planning Provisions, [VPP]. We also note the strong link to improved funding arrangements.

The draft Regional Coastal Plan

The Plan has identified eight key areas of focus and designated outcomes supported by annual monitoring, evaluation and reporting.

Comment: **We support the Plan's structure of regional priorities, actions and designated outcomes.** However we have provided additional comments below on the **nature and linkages** of these proposed actions and outcomes and how they may be improved.

A Regional Plan implies an obligation to use the best available information to address the identified issues.

Comment: **We note the eight key areas of focus but recommend that a higher priority be given to the need for research, a better understanding of coastal processes and coordinated monitoring.** This issue lies across six of the identified key focus areas. ie population growth, adaptation, integrating coastal planning and management, protecting significant coastal ecosystems and promoting leadership and coordination.

The Hierarchy of Principles and Plan structure.

The Hierarchy of Principles recognises that the foundation of coastal planning and management is a healthy coastal and marine environment. The actions within this Regional Plan should support and link the Principles and ensure that decision- making on the coast is guided accordingly.

Comment: **Given that providing for the protection of significant environmental and cultural values is the highest regional priority we suggest that this be recognised within the Plan as follows:**

- an explanation or case study of how the Hierarchy of Principles might be applied
- some commentary on how this Plan will enable balance between maintaining functional ecosystems and the social and economic benefits of future use
- inclusion of the Hierarchy of Principles in the "The Plan at a Glance" [p19] under the VCS Vision

Contributions from existing CAPS

We note the reference to CAPS [paragraph 1.2] and how they may be used and eventually succeeded by Coastal Management Plans.

Comment: **The recommendations from the CAP Review [2012] may be worthwhile including to link and assist the development of CMP's.**

The Plan does not mention any positive actions or achievements from previous/current CAPS.

Comment: **We recommend that strategies, actions and achievements that have worked well in one area and could be applied elsewhere be included.**

Introduction Section

This section, together with the regional vision, maps and decision trees, provides good information and context throughout the document. In particular the legislative requirements under *The Coastal Management Act 1995* hierarchy [figure1] and acknowledgement of the area of coastal hinterland that might influence The Plan. The Central Region's coast characterisation and map is also good.

Comment: **These should be retained.**

2 Valuing and Understanding the Coast

2.1.1 Bio-physical features Coasts

Comment:

- We suggest that a description of coastal processes similar to that in the draft Western Regional Coastal Plan would be beneficial.** The Estuaries section [p9] is more comprehensive.
- **the inclusion of an additional eco-services category under the list of benefits provided.[p 9]**
- **an explanation of how the Victorian Waterway Management Strategy’s recommendations link with this Plan.**
- **that an additional map be included which focusses on natural ecosystems, under represented ecological vegetation classes, rare or endangered species habitat areas, important bird areas[IBA], salt marsh and seagrass beds.** This visualisation would provide a map of our natural assets on both public and private land at a glance.

2.1.2 Marine [p9], Regional Priority 1 Population Growth [p20] and Regional Priority 6 Sustainable Visitation [p29]

We note the proximity of many marine protected areas to major population centres and the projected increase in population, both in Melbourne and surrounds. Previous studies, [Melbourne Water] and a recent CSIRO study [noted on p12] have identified the issue of litter and nutrient loads from catchments [including dog faeces in Port Phillip Bay] as a serious concern.

Comment: An appropriate mid – to long term response is needed to target these adverse impacts at the source. Additional Actions and Outcomes are needed to cover this issue. We suggest-

- including an additional Action [p19]’The Plan at a Glance” “Action 2,” “Target and reduce the adverse impacts on coasts, waterways and marine areas.”**
- **that an appropriate Action and Outcome for managing pollution be added under Regional Priority 1 Population Growth, [p 20]**
- **that similar Outcomes and Action be included in the Sustainable Visitation and Tourism Section [p29]**
- **At the State level, a recommitment to the preparation of a Marine Strategy (perhaps after the proposed legislative change to convert the Coastal Management Act to a Coastal and Marine Act).**
- **Also at the State level, developing a management framework for marine energy facilities.**

Sustainable Visitation and Level of Service [p29]

-we strongly support the priority for functional ecosystems noted here - but recommend that” for highly vulnerable landscapes and sites “ **That increased access is not appropriate due to environmental considerations at some sites (as per the VCS Hierarchy of Principles) and that an additional section on page 29 Priority Actions 6[3 . [d]] be added. This section would “identify highly vulnerable parts of the landscape and habitat areas where no visitation occurs or is restricted.”**

2.2 Ecosystem Services

Comment: **We support the commentary and Figure 4 that profile these services. However, the inclusion of current economic data against an enlarged list of the services provided would enhance this section and provide a link to the VCS. [p12 “non-commercial values”]. Recognition of their financial contribution should be noted also in the section on Economic Values.**

2.3 Social and cultural values

Comment: ACS Victoria would like to have seen a more thorough treatment of cultural heritage, both Aboriginal and post- contact. **The heritage assets of the central coastal region have been outlined in a response by the Heritage Council of Victoria to the initial call for submissions on the content and purpose of the regional coastal plan.** This heritage includes many sites of ongoing cultural heritage important to Aboriginal people, as well as places

valued by the whole community. They include fossil beds; sites of geological and geomorphological significance; wildlife viewing opportunities; the location of Victoria's first settlement at Sorrento and a very significant maritime heritage. **We also suggest that the word, "heritage" be included in the first paragraph.**

2.4 Coastal Settings of significance [p11]

The first paragraph provides some context of landscape, coast and marine areas.

Comment: **Recognition of State wide and regionally important landscapes should be included.**

3.1 Natural coastal processes [16]

Comment; The description and accuracy within this section could be improved by the following changes:-

- **second paragraph** , When coastal processes have an [**adverse**] impact on natural or built assets they are considered a hazard.
- **third paragraph** re studies commissioned. It would be helpful to identify these studies, whether they have provided new information and their recommendations.
- **fourth paragraph** referring to improved information. What other information has been provided besides the Victorian Coastal Hazard Guide 2012?
- **fifth paragraph** does this refer to the Victorian Coastal Hazard Guide's recommendations? If not there is a risk that for existing coastal hazards, hard structures are seen as the only solution. The other options of adapt and retreat should be identified here as well.
- **paragraph six** – should protective works proposals be the only option we support that they be designed as part of a whole of coastal cell approach. ACS Victoria supports the use of 'coastal cells' as a basis for planning. eg Coastal Sediment Compartments, where appropriate.
- **paragraph seven**- it is important to identify the location of the original dune system to reduce risks to modification or destruction.
- **case study** – include the positive aspects noted from the 2014 storm ie that well nourished beaches provided a buffer.

3.2 A Changing Climate

Comment:

- **paragraph one** -We note that one of the changes in climate will be increased warming.
- **We suggest that sea level rise is not an impact but rather an effect of climate change. Sea level rise causes the impacts.**
- **paragraph four** – We note the mention of the need to allow for the combined effects of tides, storm surges, etc We wonder if geology and geomorphology will be included.
- **paragraph five**- we strongly endorse this section as it contains critical information and direction.
- **later parts of this section** note studies currently being completed. We recommend that **outcomes from these studies be included in this Plan.**

Priority Actions for the Central Coastal Region [18]

Comment: **We support the notion of integrated actions for the region and that start dates have been included within the Priority Actions tables.**

Regional priority 1- Population Growth- Balancing Access and Valuing the Natural Environment p20]Comment:

- **We highlight the VCS Hierarchy of Principles and their critical use in identifying access and use.**
- **We recommend that an ecosystem approach to level of service be used. Hence we suggest an additional outcome be included," Maintaining healthy and functioning ecosystems as a primary objective". This will guide decisions for outcomes 1-5. This strategy should also be used for Regional Priority 6 Sustainable Visitation and Tourism Infrastructure Level of Service. [p29].** – to include within the Priority Action table an analysis of the Melbourne and G21 Regional

Growth Plans in relation to the potential and current impact on the coast from their recommendations.

A Changing Climate Regional Priority 2 – Adapting to a Changing Climate and Increased Coastal Hazards [p22]

Comment: there is much that we don't understand about the dynamics of the coast and coastal behaviour. Some of this is due to a lack of understanding of coastal processes as a result of a lack of long term monitoring.

-highlight the information that we don't have for coastal dynamics, especially "coastal behaviour" so that people know regionally what is known and what not.

-there be more use made of photographs, plans and strategy documents housed within organisations such as historical societies to inform planning and contribute to effective community consultation and decision –making.

-we recommend that the ongoing collection of baseline data should be a priority.

- planning for and progressively carrying out a benchmark survey of the environmental values of the Central region coast, to form a comparison for future monitoring.

-ACS Victoria recognises that addressing existing flooding and erosion risks is a priority. In addition, it provides a pathway for engaging local communities in considering potential future climate change.

-We also support the need for an integrated approach that takes account of storm surge, shoreline erosion and sea level rise. This includes developing flood prediction methodologies that combine catchment-based flooding and coastal inundation.

-within the Priority actions table [p22] there is the opportunity to separate actions prior to and post adaptation.

– we note that for Action 2.3 [p22] that these methodologies already exist.

-an additional issue with Actions and Outcomes be listed within adaptation and planning: the "coastal squeeze" .ie that encountered by coastal ecosystems such as estuaries and saltmarsh, when their ability to adapt to sea level rise (by moving inland) is blocked by seawalls or road embankments. Appropriate actions which identify opportunities to retain these systems and the ecosystems services and value that they provide should be identified.

-ACS Victoria recommends that there be stronger support and recognition of science, [including citizen science] to guide current and future planning.

--Allowing Coastal Management Plans to extend to other coastal land, including freehold land, is also supported. This is essential for sensible planning for adaptation to climate change, especially facilitating natural adaptation of ecosystems and planning for maintenance of public access in areas subject to accelerated erosion, including where Crown foreshores have already been lost.

Thank you for the opportunity to comment on the draft Central Regional Coastal Plan. Should you require further information please contact me on M: 0477919354 or email vic@australiancoastalsociety.org

Yours faithfully

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