

**Port Campbell Community Group Inc. submission to the Western Regional Coastal Plan 2015-2020
Draft, 17 March 2015**



Thank you for inviting the Port Campbell Community Group Inc. (Group) to make comment on the Western Regional Coastal Plan 2015-2020 Draft (Draft) which is slim, precise and well written.

Group members have lived in the area for most of their lives and empirically understand the coast and challenges it faces. The Group has also actively participated in coastal planning for over 13 years seeking many expert reports, and feels capable of making expert recommendations especially on coastal policy, understanding and valuing the coast, and the dynamics of the Port Campbell coast.

The Group is dismayed at the continual loss of valuable coastal natural and heritage assets.

The Group makes suggestions and comment on the Draft in regard to its expertise on the Port Campbell coastline:

Coastal Policy

Planning Policy – Draft, Strategies

- The Draft is similar to previous Strategies and Guidelines, and includes the important ‘hierarchy of principles’.
 - We agree with the ‘hierarchy of principles’, but they appear to have held little weight in past decision-making and the coast continues to be damaged irreparably for future generations.
 - We recommend more prescriptive, clearer planning policies which must be upheld and that cannot be constantly undermined, rather than strategies and guides.

Poor Decision Making results in Incremental Loss of Coastal Assets

- The word ‘Balanced Decision Making’ is highlighted in the Draft. We must ask does ‘balanced’ imply a ‘compromise’ of policies. If a planning policy and the protection of coastal assets is compromised every time a development is proposed to get a ‘balance’, then there will be continuous incremental loss of Victorian coastal assets.
- Examples of poor decision making include:
 - Corangamite Shire Amendment C30 which rezoned 10 large sites (over 1000 hectares) for large scale tourism development on 28 kms of the Port Campbell coast. This coast is listed under ‘Coastal Spaces 2004’ to have no development between towns. The planning panel recommended a ‘compromise’ to allow 4 of the 10 sites, but Council requested the Minister to allow all the 10 sites – which he did. Even the ‘compromise’ of the planning panel was against planning strategy.



Amendment C30 undermines Coastal Spaces

- o An overly high dwelling on the Port Campbell headland in a hazard zone near unstable cliffs and caverns which has had inadequate geotechnical investigation and failed to consider the visual impact on a state and national heritage listed landscape. Even planning policy – to build the height of the vegetation – did not hold up in this case, nor the hierarchy of principles. The whole process seemed to be one mistake after another which has taken extensive community time and energy to no avail, to date.



Visual intrusion on national significant heritage headland



Valuable social asset – headland walking track – lost by overlooking



Building near unstable cliffs and large caverns and tunnels



New dwelling in hazard zone has not had appropriate geotechnical investigation



Eroding cliffs 50 m from dwelling being built

- The proposed Southern Ocean Beach House 2003-2014. Another planning mistake. This proposal should never have got past the initial planning stage. The scale was too big an impact – 20,000 tonnes of excavation – near fragile limestone cliffs and caverns. It did not fit the ‘coastal village’ strategy of Coastal Spaces or the Great Ocean Road Strategy or the Port Campbell Urban Design Framework; the VCAT Member said that these strategies do not say you cannot build a large development in a small coastal village. We must ask what value are strategies. This proposal kept the Group working hard for over 12 years. There must be better planning policies that rule out immediately developments that compromise planning schemes, especially in fragile coastal areas.



Diagram from Dr Susan White, karst specialist's report

- The Shed Coast – The beautiful Shipwreck Coast will soon be able to be called the Shed Coast. This coast is not supposed to have any buildings or visual impacts between towns (Coastal Spaces). But over the last 10 years there has been the addition of visually obtrusive shed(s) or house(s) in almost every major viewline.



Sheds disrupt scenic lookout and important hinterland viewlines and Great Ocean Road viewlines

- Economic Values
 - The pristine coast (not much left) should have its nature and heritage assets tallied in economic value. The Draft in fact measures the value of the coast to the tourism industry (\$1.1 billion per annum p.9). But we must ask what value to tourism it will have when the values that bring tourists to the area are destroyed. Dr Ray Green's coastal surveys show that tourists go on to the next pristine spot when a place loses its pristine nature.
 - Too often in planning the immediate, obvious 'economic values' of a proposed development is tallied but the economic value loss is not tallied according to destruction of the natural and heritage asset.

The Shipwreck Coast Master Plan (SCMP)

- The Shipwreck Coast Master Plan appears to be unrealistic and will significantly devalue social, heritage and environmental values of the Port Campbell coast. The Group attaches its submission.
- Comments to the SCMP and Port Campbell Town Plan included a spa in the town, not at Two Mile Bay as the Master Plan implies.
- There are 10 large sites designated for large scale tourism development via Amendment C30, including just over the road from the Two Mile Bay site. There is no need to allow a developer to take over environmentally sensitive public land for a Spa resort when it can be placed in any one of the 10 rezoned tourism sites.

'Community Coastal Values' p.10.

- The headings should read: Social, Cultural, Environmental and Commercial. All 4 headings have economic values which must be protected.
- The Environmental heading should also include 'Biodiversity'.

Biodiversity

- There is too little written on the significance of biodiversity or endangered or threatened species.
- 'Foreshore ecosystems' (p.5) has little or no emphasis on the significance of biodiversity or the need to protect indigenous species.

Climate Change, Natural Coastal Processes, Coastal Erosion

- Great to see this section added to the Draft.
- The Port Campbell coast is a soft rapidly changing coastline and Hazard Zone Overlays should be implemented urgently, with any proposed development to undergo rigorous testing for impact on the environment and environmental impact on the development.
- Ocean Acidification should also be mentioned on page 22 in regard to effect on the soft limestone coast. The limestone will dissolve when the Ph. changes only a small amount. Scientists are already recognising this effect on corals and shelled marine creatures. What effect will this have on the Port Campbell coast? Assets (limestone cliffs) will dissolve rapidly and cause major displacement of towns and loss of tourism facilities. Scientific advice should be sought immediately and as part of all planning decisions.

Visitation Pressures

- The graph p.12 shows that the visitation pressure on the Great Ocean Road is out of balance with other areas. While coastal councils and tourism operators seem constantly to want 'more', as previously mentioned it has not been assessed what is sustainable on the Great

Ocean Road without destroying the asset the tourists come to see. There has already been many comments on the Port Campbell coast that it is not an enjoyable experience.

- Recommend greater advertising of other coastal and inland areas to take the pressure off the Great Ocean Road, specifically to reduce pressure on the Port Campbell Coast.
- Council appears to continue to compromise this coast for a quick dollar and without due consideration of impacts on natural and heritage values, including Council's proposal for a Spa Resort near Two Mile Bay. Council decision-makers need educated so that they understand the long term implication of continuous unsustainable commercial development on the social, historical, environmental values of the Port Campbell coast.

National Parks

- The Draft Strategy should advocate that the government protect the coastal national parks from any private development and revoke the policy which allows private development in the national park.

Biodiversity

The Draft does not have enough emphasis on preservation of coastal biodiversity. The government has a duty of care to protect all indigenous species and it should be foremost in the Draft.

Summary

The Draft appears to have too much emphasis on human activities on the coast rather than protection of biodiversity, environmental and scenic qualities.

The Group hopes the Draft will be changed to include our concerns and to encourage the State Government to implement more prescriptive, stricter planning policies to protect the heritage, social, and environmental values, including scenic qualities of the coast and biodiversity, which all tally to support intergenerational economic equity.

The coastal erosion section needs to be fast-forwarded in implementation, especially in Port Campbell township and its coast.

We are happy to discuss any of these issues.

Yours sincerely,



Port Campbell Community Group Inc. A0051688U

PCCG Inc. Statement of Purpose: *To protect and conserve Port Campbell headland, port, and national park from inappropriate development and environmental, social and infrastructure impacts of inappropriate adjoining development.*

- *Finalist Award in Victorian Coastal Awards for Excellence 2013*
- *\$25,000 Coastcare Grant 2012 to raise awareness on Southern Brown Bandicoots*
- *Finalist Award in Victorian Coastal Awards for Excellence 2011*
- *Certificate for Nomination to the Regional Achievement and Community Awards 2011*

SOUTHERN BROWN BANDICOOTS

THEY'RE
ENDANGERED

They're
Australian!

They're Rare!

They're not
like mice! (or rats)



They're
harmless!

Port Campbell

They're cute!

SAVE 'EM

Arthur Watson

