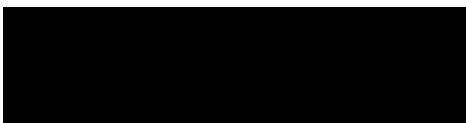
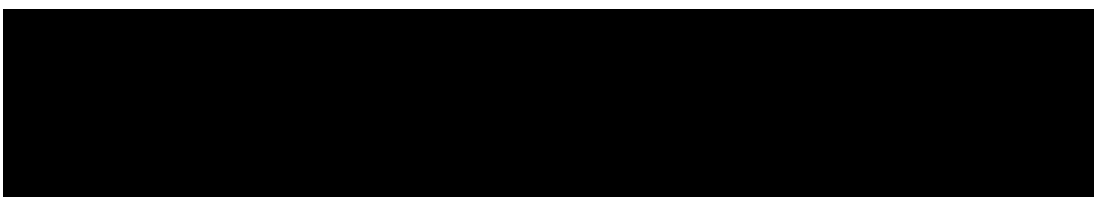


Submission on Draft Western Regional Coastal Plan, March 2015



5. Considerations in revising the Draft Plan

As a community member in the Glenelg Shire to 2007 I have experienced the value of the VCS and Coastal Action Plans in guiding municipal coastal planning, and their legislative force (through VCAT) when GSC coastal planning permits did not give them due regard. I am concerned that their influence is maintained as strongly as possible to encourage local government to respect the coastal planning framework.



These experiences inform my submission, under the headings

The Value of CAPs

The need for further CAP development

WCB CAP recommendations 2012

GSC Case Study - in a 'coastal policy vacuum' since 2012?

The Draft Western Region Coastal Action Plan

Ch. 8 Monitoring and Evaluation

Other comments

The Value of CAPs

The regional CAP reviews found that ‘CAPs have been a very effective mechanism for facilitating the collaboration necessary to deliver Integrated Coastal Zone Management (ICZM) ...’

According to the VCS 2008 (p. 68) CAPs are the primary legislated tool for planning and managing significant coastal, estuarine and marine areas or issues in Victoria. Their legislative force derives from the *Coastal Management Act 1995* and I trust that this will be ongoing in the Review of the Coastal Management Act. They have involved communities in their development and are an effective mechanism for use by diverse agencies achieving ICZM in managing the coast.

At Coastal Partnerships meetings I attended 2010 - 12, CAPs were discussed and valued – DSE and CMA managers said that where Planning Schemes were silent on coastal issues, they would refer to the municipal, regional and estuarine CAPs – “What do the CAPs say?”

The need for further CAP development

By 2012, various agencies had completed 82% of CAP actions. Those remaining from the original CAPs generally needed

- more agency resources to accomplish them, and
- greater Board capacity to assist CAP implementation.

Emerging issues such as climate change and its coastal effects, population and visitation change, and marine health meant that the then Board considered that a ‘second generation’ of CAPs would be necessary. ‘Sub-regional CAPs’ enunciating policy and actions to guide ‘on the ground’ managers from various agencies could replace a number of municipal-based ones.

Coastal Management Plans (CMPs) would be developed at finer scale, for smaller intensively-used areas, by the agencies themselves, supported by WCB, and would not be broadly applicable to a wider area as are the CAPs.

Where agencies develop Coastal Management Plans for specific areas, as Glenelg-Hopkins CMA has done for most of its estuaries, it does not mean that the principles underlying ‘sub-regional’ CAPs can be dispensed with, because there are significant emerging issues. And who is responsible for ensuring coastal planning between CMPs is coordinated, if not WCB through developing appropriate CAPs?

As with the successful *Boating Coastal Action Plan 2010* (BCAP), perhaps some future sub-regional or regional CAPs should be theme-based, dealing with (say) climate change effects and actions *specific to the region*; and marine health, dealing with actions achievable at specific places to maintain water quality and to prevent litter and microplastics from reaching the sea.

WCB CAP recommendations 2012 –

After the CAP Review, a 'Draft CAP Scoping Issues Paper – for WCB Meeting 1 June 2012' was developed.

The paper stated

'There are a number of risks if a second generation of CAPs are not developed. Critical concerns... are

- loss of momentum for good coastal management
- loss of a cross-jurisdictional mechanism which has been demonstrated to work well
- undermining of acceptance of Regional Board roles by land managers.

A lack of second generation CAPs would jeopardize the implementation of the VCS, create a coastal policy vacuum at the regional and local levels, and cause a loss of guidance for the preparation of coastal management plans. There could be a significant risk to the coast through ad hoc urban development, and a gap in social, environmental and cultural planning' (Summary p.2).

Regrettably, it appears from the Draft *Western Regional Coastal Plan 2015-2020* (WRCP) that a second generation of CAPs has not been pursued, and that it is assumed that the Regional CAP and CMPs will suffice to achieve good coastal management. However it appears that there has been a pause in 'momentum for good coastal management' in the Western Region with consequent risks to the coast, as predicted above.

Frequent changes to Government Departments and changes to policy emphasis, for example under-resourcing WCB while resourcing Regional Development Victoria to develop Regional Growth Plans (RGPs - Great South Coast and G 21 RGPs in this region) may also have undermined coastal management structures that existed in 2012.

VCC and RCBs need better resourcing to examine the RGPs in relation to their impacts on the coastal zone – although the RGPs do acknowledge coastal values, Regional Development Victoria did permit development issues to outweigh coastal constraints in the following examples of Planning Scheme Amendments proposed by the Glenelg Shire Council.

GSC Case Study - a 'coastal policy vacuum' since 2012?

The Glenelg Shire management of its coast provides a case study. Despite a projected slight drop in its population (Table 1, p. 12) it seeks to increase coastal subdivisions.

In 2010/11 it had proceeded with its Significant Landscape Overlay Amendment C 52, and endorsed Panel findings for SLOs including the State-significant Cape Bridgewater and Bridgewater Lakes in January 2012, forwarding the Amendment to the then Minister for Planning for approval. But Amendment C52 for SLOs was not gazetted until October 2014.

In the meantime, possibly taking advantage of Regional Development Victoria/RGP encouragement to develop 'assets', GSC prepared its '*Glenelg Sustainable Settlement Strategy*' (GSSS) in 2012. This proposed that Cape Bridgewater 'settlement' in its high-level Significant Landscape be made more 'sustainable' by being re-zoned from Rural Conservation Zone to Township Zone on extended boundaries, allowing much sub-division and housing development. It also proposed further extensions to Rural Living Zones throughout the shire, including on the coast near Portland and Nelson contrary to recommendations in the VCS 2008.

The GSSS 2012 would be implemented by 'inserting' maps outlining proposed zone changes into the Planning Scheme, enabling subsequent applications for re-zoning, and GSC would devote all of its planning budget for 2012-13 to its implementation through Amendment C 73.

Despite VCS 2008 strategic advice to limit coastal housing, and to treat Cape Bridgewater as a 'cluster of housing in a rural zone,' re-zoning it to Rural Living on existing settlement boundaries (p. 88, Note), the former Minister for Planning allowed Amendment C 73 to proceed.

Fortunately the Planning Panel for C 73 required 'further investigation' of the proposed Township Zone at Cape Bridgewater; but all of the GSSS 2012 maps showing the shire's ambitions for residential development on and near the coast have been 'inserted' into the Planning Scheme.

Cl. 22.01 of GSC's Planning Scheme now shows a map to 'investigate' Cape Bridgewater (p.12) as a Township Zone with extended boundaries. This is stoking developer ambitions for coastal subdivisions in what is still the Rural Conservation Zone. GSC plans to fund this 'investigation' in 2015-16 (Meeting minutes, Dec. 2014, response to question).

In the meantime, anecdotally, some Cape Bridgewater landowners are behaving as though the re-zoning has already occurred, e.g. encouraging caravans to park on their properties in what is still a Rural Conservation Zone, which GSC is apparently no longer enforcing.

However Amendment C 75 - to re-zone Rural Conservation Zone land around Portland to Farming Zone and Rural Living according to GSSS maps - is 'on hold' (indefinitely, according to a Regional Development Victoria officer) after exhibition in 2014. This gives some time to review GSC sub-division proposals in the light of ICZM.

The Draft Western Region Coastal Action Plan

I consider that the Draft WRCP does not adequately respond to the need for strong ICZM in the Western Coastal Region because in my view

- The links from the *Coastal Management Act* 1995 through CAPs to municipal Planning Schemes do not appear to have been adequately 'incorporated into Western Regional Coastal Plan' (Table, Ch. 5).

WCB's Review of CAPs 2012 (Appendix 2 p. 32) recommended strengthening these links, e.g.

7 (b) re a 'dedicated municipal section' within revised Regional CAPs (aimed at ensuring that municipalities are fully aware of and involved in their coastal responsibilities).

10 (a) re future Regional CAPs and the need for strong 'linkages to other strategic planning mechanisms'. These might include Planning Schemes, Regional Growth Plans, and Regional Catchment Strategies. There is little reference to these planning mechanisms in the document, and only one to 'draft planning scheme amendments' (4b) in the Actions.

20 (a) re 'subregional guidance' for the development of CMPs and improved linkages between the VCS, CAPs and CMPs; the Ch.5 'map and actions' do not fulfil this.

- Actions relating to population increase are not mentioned.
- No actions arise from Chapter 2 *Coastal Values*, e.g. relating to the environment. They could include
 - actions for control of pest plants and animals,
 - actions supporting significant flora and fauna species,
 - actions to support flora and fauna being 'squeezed' by coastal development and climate change
 - marine management actions (now a priority to maintain marine health).
 - actions encouraging dispersal of visitors, including off the GOR. They could include advocacy (to Government and VicRoads) for better inland roads to the Far South West and better promotion of its attributes (advocacy to Tourism Victoria).
- The map on p. 7 is inadequate to show the extent and depth of the region's cultural heritage, environment, and habitats.
- Ch. 3 *The Dynamics of the Coast* also lacks actions. These could include working closely on coastal development issues with Regional Development Victoria's Great South Coast and G 21 bodies.
- Timeframes for urgent work appear to be too long – e.g. 4.3, identifying 'priority areas for visitation' by 2020; and 4.2. (b) While a 'levels of service' approach to managing the coast is strongly supported, in many places this is urgent. A regional CAP similar to the WCB Boating CAP would be the best way to resolve this, in my view.

For example, better use of Cape Bridgewater as a resource needs to be encouraged now. It is a 'priority area for visitation' within the Shire and housing development should be limited, given its State Significance Landscape and Environmental Overlays, cultural heritage and the development constraints of its soil type (free-draining limestone and ash, requiring sewerage rather than septic systems to prevent

contamination of the ground water – *GS Waste Water Management Plan, Cape Bridgewater Report, March 2009*).

While its beach can hold many visitors, they could be accommodated off-site. Many visitors to the region and Cape Bridgewater already stay in Portland (20 mins away) where accommodation is under-utilised. Applying logical 'levels of service' to these two areas could resolve two problems – potential over-development at Cape Bridgewater, and empty accommodation in Portland.

5.3, ensuring CMPs are in place by 2020 –

If a CMP is needed it is sooner rather than later, given above pressures for development which are not confined to the Glenelg Shire.

- Ch. 6 – Flooding and Erosion Actions – most coastal councils have undertaken work in this area already, and have been resourced to do so. Facilitating communication among coastal councils on their findings and actions would assist them, while Nos. 6.3, 'refining methodologies' by 2017 and 6.4 'determining desirable outputs' by 2020 are very long timeframes given the urgency of this work in view of risks arising from weather events and storm surges, especially along the Great Ocean Road which is the main access for many small communities.
- Actions 7.2 and 7.3 only specify engagement with groups already committed to coastal issues; I consider that all coastal communities and residents are stakeholders and WCB needs to engage with them as much as possible.

Ch. 8 Monitoring and Evaluation –

I consider that the timelines provided for actions in Chs. 4-7, do not respond to need.

Reporting only to VCC is in my view inadequate. Better use needs to be made of the WCB Web Site - the WCB is also responsible to its community, and there does not appear to be any means of reporting progress to them.

Other comments –

- Action 5.2, to 'Work with Traditional Owners in preparing land and sea country plans' is commendable, but TOs need to be involved as much as possible in developing CAPs and CMPs as well.
- All engaged in caring for Victoria's coast need better resources in order to do so effectively, starting with the VCC and Regional Boards and all coastal managers – LGs, CMAs, Parks Victoria and DELWP.
- Education of the community on coastal issues and values is not mentioned in the WRCP, and this is surely a role of the RCBs. See G.

Wescott, *The Future of Victoria's greatest asset; the coast*, Feb. 2006, pp 8 -10.

- The WRCP seems to have been prepared based on an assumption that there will be legislative change through the revised Coastal Management Act, in relation to CAPs and Coastal Management Plans. It presumes that the CMPs will have a greater role beyond coastal Crown Land. It is uncertain whether that will be reflected in new legislation.

In my view, although their application has been uneven, CAPs are very valuable in responding to community input and providing the context in which CMPs should be developed, and responsibility for developing CAPs must remain with the RCBs.

I consider that sub-regional Coastal Action Plans (geographic or themed) should be prepared, enabling WCB to implement the VCS through re-engaging with all communities and regional managers.

Agreed, up-to-date outcomes for better coastal management throughout the region should result.

