



# Department of Environment, Land, Water and Planning

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WRCP

Dear [REDACTED]

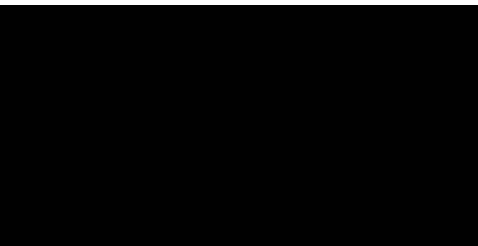
## DRAFT REGIONAL COASTAL PLANS

I would like to thank the three Regional Coastal Boards for the opportunity to provide comments on the draft Regional Coastal Plans. A significant amount of work has been undertaken by the boards in preparing the draft plans. I would especially like to acknowledge the extensive regional consultation process; including public, practitioner and councillor/executive sessions, that have been undertaken.

These inaugural Regional Coastal Plans will contribute to the strong four-tiered—state, regional, local, and site—coastal management and planning system we have in Victoria. The Department of Environment, Land, Water and Planning's submission enclosed has been structured to provide general feedback applicable to all three plans, followed by some additional comments relevant to each specific plan.

Thank you for raising this matter with me.

Yours sincerely



Encl.



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## General feedback on the Regional Coastal Plans

ACTION

### Election Commitments – Further acknowledge and alignment with the delivery of the key government priorities relevant to the coast

Since the preparation of the draft coastal plans, the current government has commenced implementation of its key election commitments. The Department of Environment, Land, Water and Planning (DELWP) is happy to work with the boards to help align the regional coastal plans with priorities of the current government, including marine and coastal related election commitments outlined in *Our Environment, Our Future*. The government has committed to the following new initiatives to protect and enhance Victoria's marine, coastal and bay environments which are relevant to all three plans:

- introduction of a new Marine and Coastal Act;
- improved management and oversight arrangements for marine parks, coasts and bays;
- a five-yearly State of the Bay report to monitor the health of coasts, bays and waterways; and
- further consultation on a Victorian Floodplain Management Strategy with targeted stakeholders.

### Values – The significant values identified in the plans could be strengthened by the inclusion of additional values and prioritisation to assist local decision making

One of the key strengths of the draft Regional Coastal Plans (RCPs) is their identification of regional values along the coast. A consolidated set of social, economic and environmental values will inform land managers, planners and other practitioners, as well as the community, and enable them to better care for and protect the coast. A useful further step for the RCPs would be to provide some prioritisation of these regional values, for example based on their existing information on condition or known current/future threats, to further guide local decision making.

Specific values that could also be further acknowledged within a regional context by using existing data and information in the RCPs include:

- natural heritage values, such as geomorphological and paleontological values;
- marine values, such as marine mammals; and
- regional biodiversity values, for example the Orange Bellied Parrot in the Western region.

As the response agency for emergency management arrangements relating to water infrastructure, DELWP's role also includes coordinating arrangements to protect the community from algal blooms, such as providing warnings and advice. DELWP suggests the plans could recognise that algal blooms are a natural feature of the landscape, but in this

context it should be acknowledged that they have an adverse impact on how waterways are used, particularly impacts on social, economic and environmental values. Therefore, it makes sense in this instance to remove reference to algal blooms as a community coastal value. Similar consideration should be given to water quality hotspots.

Translation of the Victorian Coastal Strategy 2014 – Further demonstrate the links to the VCS to better translate state-wide policy to a regional context

The *Coastal Management Act 1995*, sets out that a Coastal Action Plan (which is a Regional Coastal Plan) must be consistent with the Victorian Coastal Strategy. The current and fourth iteration of the strategy, the Victorian Coastal Strategy 2014 (VCS), states that Regional Coastal Plans will translate the high level strategic advice of the VCS into a regional context.

The three RCPs will support DELWP to work with other coastal land managers to translate the principles, directions and actions of the VCS to a meaningful regional level. The RCPs provide a framework to unify the region's focus by providing an overarching commentary on management context, landscapes, values and directions specific to the region. In doing so, the RCPs serve a broad audience and would benefit from clearly outlining upfront their value and purpose as a document to translate the VCS into a regionally relevant document. This could be in addition to aligning the RCPs to the relevant actions in the VCS as already provided for in the appendices.

The Western and Gippsland RCPs could better capture the broader strategic management and planning context by aligning their actions with the key issues as identified in the VCS. The Central RCP best articulates the link between the high level VCS key issues e.g. managing for population growth and the RCP's Priorities for Action in a succinct table.

There is a risk that in translating the VCS at a regional level a summarised or regional version may provide a different context or emphasis than the VCS policies. This has the potential to create confusion for coastal managers and planners in how to apply the policies if they seem different and determining what status they have. For example, in the Gippsland and Western RCPs, section 3.1 'natural coastal processes' references coastal structures in terms of their function and where they should be placed in relation to coastal hazards. This relates to the VCS policies of, 'coastal dependent use', 'criteria for use and development on coastal Crown land' and 'coastal hazards and processes'. The VCS policies should be more closely referenced and linked in this section. The Central RCP provides a good example of this under section 7-managing coastal land and infrastructure.

This also applies to the actions in Western and Gippsland RCPs chapter 6 – flooding and erosion. The actions should be more closely linked to and reference the actions in VCS under 'coastal hazards and processes'.

Climate Change – Additional emphasise on the importance of addressing and responding to climate change as part of regional coastal management and planning

Climate change is one of the most critical issues facing Victoria and there is a need to mitigate the risks and adopt adaptation strategies to respond to the threat. While it is recognised that the VCS refers to “a changing climate” and in some instances this will need to be retained to ensure consistency, there is an opportunity in the RCPs to better reflect current policy by referring to climate change and climate change adaptation.

The Victorian *Climate Change Act 2010* requires decision makers to have regard for climate change in acts, decisions or actions under the *Coastal Management Act 1995*. This includes the endorsement of a Coastal Action Plan under section 26. The *Climate Change Act 2010* and this legislative requirement should be referred to in the three RCPs in the relevant sections.

Management and oversight arrangements – Clarify the roles and responsibilities of coastal managers in light of recent changes and further provide regional examples of the challenges posed by existing governance and funding arrangements

A key function of the RCPs should be to assist with identifying the roles of various coastal land managers and other key stakeholders and their respective jurisdictions. The diagrams showing the management arrangements along the coast successfully identify the complexity of the existing arrangements in place in Victoria. However, these need to be reviewed to ensure they remain accurate following recent Machinery of Government changes, for example DELWP’s role in waters out to three nautical miles. DELWP’s Water and Catchments Group is happy to work with the Boards to work through how the institutional arrangements for emergency management, as outlined in the *Draft Victorian Floodplain Management Strategy* could be applied along the coast, such as the management of flood mitigation infrastructure.

DELWP plays a key role working with and supporting the capacity of coastal land managers to care for and protect the coast and the RCPs successfully recognise that the capacity of land managers is a critical issue on a regional scale. A key challenge that the RCPs could further highlight, using examples, is how governance and funding arrangements can impact capacity for the delivery of strategic directions set out in the VCS and the RCPs.

The RCPs recognise the need for coastal managers to work together for good coastal management outcomes, to engage community in that management and recognise the influence of land uses across boundaries. A challenge of coastal land management at a regional scale is managing pressures on the coast that stem from use across the broader landscape, across jurisdictions and across tenures. A key tool in doing so is Coastal Management Plans and as such, the RCPs direction that good management should not be bounded by land tenure is strongly supported and encouraged.

Other plans and existing Coastal Action Plans – Strengthen relationships with other regional plans and existing Coastal Action Plans by clarifying the relationship and emphasising regional priorities

As these are the inaugural RCPs, DELWP strongly supports that existing Coastal Action Plans may continue to be used while they are transitioned into sub regional plans. In the interim, it would be beneficial for the RCPs to clarify which plan takes precedence in the case of any inconsistency. This would be consistent with the Hierarchy of Principles approach underpinning the VCS.

The RCPs play an important role in recognising and facilitating decision making about regional priorities through their reference of other regional strategic documents, such as Regional Strategic Plans and the Regional Growth Plans. The RCPs could more explicitly recognise the priorities of other strategic documents, and what this means for managing the coast in the context of adjacent settlements and other land uses.

Building on the strategic directions in the relevant Regional Growth Plans, there is also an important opportunity for the RCPs to identify the respective scale of settlements on the coast. This would then reinforce a broader understanding of which settlements will evolve as large urban centres and which will remain as smaller centres. For example, the strategic policy outcomes being sought by each RCP can be shown through inclusion of a map that identifies areas for growth, areas for protection etc, providing the "Regional vision for land use and development at-a-glance". Such visual aids would be useful to illustrate the spatial distribution of projected population growth, and thereby provide an idea of where visitation and tourism demands are likely to be accommodated in future.

Visitation – Provide further information on the range of visitor activities within a regional context

All three RCPs identify specific locations that attract strong visitor numbers, especially during peak periods. This is a key challenge for coastal management as identified in the VCS. The RCPs could provide further information to better understand the full range of visitor and residential activity at a regional scale, and the needs, now and in future, including those of 'secondary visitation'. Such information would encourage improved decision making around the impacts of increased visitation. This could be part of the proposed Visitation Demand or Visitation Level of Service frameworks proposed as actions in all three plans.

Case Studies – Improve linkages to case studies and examples to provide regional context

A great range of case studies and images have been included within the RCPs. These identify key local issues within each region. The case studies and images, however, could be further linked to the issues discussed in the text, particularly outlining how they are important on a regional scale.

Implementation - Consider the role of additional agencies in the implementation of proposed actions and the timelines for proposed actions

An important role of the Boards is the collection of intelligence about what is happening, including the implementation of the VCS at a regional scale, and facilitating collaboration. This is touched on in all plans but could be strengthened further, particularly in the Central and Gippsland Plans. The plans could also further highlight that RCBs play a key role in providing a regional overview and context for all managers in the region as well as providing advice to the Minister for Environment and Climate change and the Victorian Coastal Council.

Consideration could also be given to including additional agencies as lead and partner agencies for relevant actions with the three plans. For example, the inclusion of Department of Economic Development, Jobs, Transport and Resources, commercial port operators, Parks Victoria and the Environment Protection Authority Victoria could strengthen the delivery of the proposed actions. DELWP also supports considering the role of Catchment Management Authorities and State Emergency Services and is happy to provide any updates to state-wide policy in this space.

Priority should be given to actions that can be easily and quickly achieved such as those that rely on arrangements and working relationships within DELWP or with its internal stakeholders; and those actions where work has already been done to provide a suitable policy basis for further development of a regional vision. Specified time frames for some less resource intensive actions could be reasonably addressed earlier in the life of the RCPs. For example, where local tourism strategies are already in place, bring forward (from year 2020) any actions that can build on this existing work to provide more localised visions or policies under the RCP.

## **Comments on specific plans**

### Gippsland

DELWP strongly supports the inclusion of the principle of Integrated Coastal Zone Management in the RCPs as this underpins the VCS. The Central and Western address this well, however it could be strengthened in the Gippsland plan. In particular, emphasising the need to consider coastal management more broadly than just the impacts on the coastal foreshore strip.

### Central

Unique to the Central Plan is the inclusion of outcomes in relevant sections. These should be reviewed to ensure they are consistent with desired outcomes set out within the VCS, and potentially identify how they help achieve them.

### Western

The VCS includes an action to incorporate information about marine areas with significant environmental, social, cultural and economic values, marine ecological and oceanographic processes, and potential threats within RCPs. Further discussion on marine management issues relevant to the region could be included.