



20 March 2015

Dear Sir/Madam

Re: Draft Western Regional Coastal Plan (2015)

Thank you for the opportunity to comment on this plan.

Whilst there is a lot of good information and ideas, there seems to have been much effort put into the appearance of the plan (lots of photos), at the expense of some substance. Further work is required to bring the plan in line with the Victorian Coastal Strategy, and to fully represent the problems and challenges of coastal management in a dynamic environment.

The plan has skimmed over (or completely ignored) several important issues which are detailed in the accompanying comments. The plan also neglects the primary role of the community in occupying, managing and responding to the coast.

I will forward several photos (by separate email) which show more clearly the issues in the Port Fairy region.

I look forward to a fully revised plan which addresses these shortcomings and offers a more realistic approach to future coastal management.

Yours faithfully



Comments on DRAFT WESTERN REGIONAL COASTAL PLAN (2015)

Threats are not adequately considered including:

- Pressure for increased fuel reduction burning and other vegetation management (e.g. slashing, scalping) adjacent to housing and other infrastructure in coastal areas which destroys or degrades native vegetation
- Environmental fire regimes are not in place which maintain vegetation and habitat values, particularly in areas where vegetation is retained in a narrow coastal strip or a mosaic of vegetated and cleared areas.
- Effects of climate change and sea level rise on coastal vegetation communities – coastal public land is often narrow and there is nowhere for plant species to migrate inland. Need plans for maintaining, migrating and expanding coastal vegetation communities.
- Effects of climate change and sea level rise on public land frontage – coastal public land is often narrow and in some places absent (e.g. Port Fairy region). Need plans for maintaining and expanding coastal public land frontage.
- Weeds are barely considered but are likely to be an increasing problem due to expansions of coastal settlements and impacts of climate change and coastal erosion. For example refer to the recent review of coastal weeds from Port Fairy to Warrnambool by Geoff Carr (commissioned by DELPW formerly DSE, Biodiversity Group, Warrnambool).
- Pest plants and animals are barely mentioned.
- Effects of climate change and sea level rise on coastal bird communities. e.g. nest sites of Hooded Plovers, Little Penguin colonies, Short-tailed Shearwater colonies

1.4 The vision for the Western Regional Coastal Plan

The vision should more fully reflect the principles of the Coastal Management Act 1995:

Significant environmental values include more than ‘protecting regional biodiversity’. Environmental values also include the physical environment and ecological processes.

The vision should also include cultural values – both Indigenous and post-settlement

‘Ensuring sustainable developments’ could be interpreted as either ensuring they are sustainable, or ensuring that development occurs.

Rather than giving a shoddy reinterpretation; adhere closely to the principles.

2.1 Environmental values

These include geological, geomorphological, coastal processes etc.

2.1.1 Marine Ecosystems

The last sentence ‘...and humans at the top of the food chain.’ Is arrogant and incorrect. The system is a complex food web (food chains are a primary school idea) and we are not ‘at the top’, rather we are embedded within it.

Protection of marine and foreshore ecosystems can be more challenging because assessment of values is more difficult, understanding of processes is not as good as on land. Also restoration following any damage is much more difficult in dynamic environments.

2.1.2 Foreshore ecosystems

Also include: saltmarsh, bird colonies and sedgeland. Islands are another important component.

2.2.1 Cultural heritage values

Name the Indigenous groups

Place names are tangible evidence of pre- and post-settlement cultural heritage

Indigenous cultural sites (e.g. middens, landscape forms) on the coast are currently being damaged by coastal erosion due to storm surge and sea level rise. Are there any strategies in place to deal with this?

3rd para: European cultural heritage values ...

It is an oxymoron that 200 buildings in Portland date from pre-settlement. Include accurate statement

Cultural values are greater than cultural heritage values. The coast has other cultural values including: visual arts, music, festivals, public art, literature, fishing culture (commercial and amateur), surf sites etc.

2.3 Economic values

Healthcare, education and retail are also key economic industries. A pie chart showing the relative contributions would be helpful.

The photo of a 'for sale' sign is a bit of free advertising for a business. Inappropriate.

2.4 Protecting coastal values

Weeds have not been mentioned as a key threat to coastal values. These are likely to be an increasing problem which may be exacerbated by coastal erosion and climate change.

Community Coastal values

- Social – meeting places, angling
- Cultural – as per previous comments. Include festivals, arts etc.
- Environmental – scrappy coverage – include intertidal zone, subtidal zone and a multitude of other values

Guide decisions by coastal planners and managers

Decisions are also guided by the FFG Act, EPBC Act, Wildlife Act, Fisheries Act. These all have an influence on planning decisions.

3.1 Natural coastal processes

Hard structures are already in place. The system is the result of what has already occurred.

3.2 A changing climate

Land is also lost to the sea

Moyne Shire Coastal Adaptation Plan for Port Fairy. Has this been published yet? Has it been commented on by the public? Should be in the reference list.

Case study – Port Fairy Working Group

Update the Port Fairy Community Coastal Challenge Group to 'Port Fairy Coastal Group Inc.'. Include the work the group has recently done in consulting with the public on the Coastal Hazard Assessment.

3.3 Demographic Trends

Include the impacts of climate change on both coastal and inland communities. Impacts of high percentage of holiday homes on coastal communities (50% residents in some areas), pressure on farmland on coast for subdivision (e.g. Killarney)

4.2 The Boating Coastal Action Plan

Developments of boating facilities often result in net loss to the environment. E.g. recent construction of boat parking for the tuna fraternity at Portland destroyed areas of seagrass.

5.2 Working together

This is a pathetically short and inadequate representation of the importance of the community in coastal areas. Mention Landcare and Coastcare.

6.1 Background

This section does not represent the urgency and magnitude of the problems facing some coastal settlements. For example Port Fairy has up to 500 properties which will be vulnerable to coastal erosion and inundation. Include some facts and figures.

The photo of Pea Soup is after the beach was cleaned up. See attached photos.

This section should recognise that the community are leaders in adaptation to climate change because the community are who will be most affected. Patronising and paternalistic statements are not appropriate. The role of government is to support the community; the community is already engaged because they are living with climate change.

Include the need to develop Emergency Response Plans to deal with coastal erosion and inundation threats including coastal evacuation.

p.24 Case study – Ocean Drive, Port Fairy (Port Fairy West Structure Plan)

This hasn't been discussed with the public at all yet which is disturbing.

The beach here is NOT managed by Parks Victoria (even your map does not show this)

A photo of Ocean Drive Port Fairy would be more appropriate here than one of Apollo Bay

6.2 Port Fairy and Barwon South West Coast key projects

'The large number of private properties and public buildings at risk ...' rather than a vague statement, include the actual numbers and a map showing the risk. Be specific.

The recent Powling Street Wetlands VCAT case (Stewart v Moyne SC (2014/360),) was the first test of the Port Fairy Coastal Hazard Assessment. It identified that the modelling used within the plan underestimated the inundation that has actually occurred. The risks to infrastructure (i.e. drainage system) from sea level rise and inundation also influenced the outcome of the case; modifying the proposed development.

6.3 Key challenges and actions

Emergency response and the role of the community and arts in adaptation and recovery after inundation events need to be included.

The implementation of retreat strategies has not been explored. E.g. in New Zealand local councils are reducing the rates of coastal properties as a mechanism to flag that their resale value is reducing due to erosion risks.

7 Supporting communities caring for the coast.

The caption of the photo 'Peek Whurrong' seems inadequate compared to other captions.

Impact of climate change on Indigenous cultural values

Revegetation is a major activity taken by community groups.

Community groups tend to be dominated by older residents - succession planning and appealing to younger people.

Case study – Peek Whurrong Coastcare

Make it clear that Deen Maar IPA is different from Deen Maar Island.

Lady **Julia** Percy Island (not Julie)

Identify that the Basin Midden Protection Project is near Killarney. Currently sounds like it is at Deen Maar

Last para: 'Also, even though Aboriginal communities and Traditional Owners already have many interests and roles in coastal management, they should also be encouraged to be involved in this work.' Sounds patronising and paternalistic.

7.2 Actions

The community should be involved earlier in the processes. Too many plans are developed without community involvement, then put out for public comment (many examples in this plan, and including this plan!). A better result occurs when the community are involved from the beginning.

8 Monitoring, evaluation and reporting

There are no actions for Chapters 2 & 3 or for the range of threats detailed at the start of these comments.

There are no actions to protect and allow migration of coastal biodiversity values in response to climate change.

9 References

These are incomplete and mostly reference 'in house' publications rather than engaging with wider knowledge and research.

Appendix 1

Include other legislation, e.g. CALP, EPBC, FFG, Fisheries, Wildlife Act etc.

Appendix 3 State and regional values ...

These are not comprehensive. E.g. Port Fairy is not just economic. It has high cultural, social and environmental values. Focussing on one value for each area is naïve and does not represent the complexity of the coastal system.

Appendix 4

The correlation of the current plan with the Victorian Coastal Strategy is poor. A much more thorough check against the VCC is required.

END