



## **SUBMISSION ON DRAFT WESTERN REGIONAL COASTAL PLAN By ACS Victorian Branch**

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

Legislative requirements under the *Coastal Management Act 1995*: [The Act]  
[a] 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 included within the document [page3] but is not incorporated within the Plan's title.

**We recommend that if the legal requirement under The Act has not changed that the word, "Action" be added to the title.**

[b] The Plan states that it identifies and prioritises management actions but does not specifically mention if 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.

**If this Regional Plan is to succeed current Coastal Action Plans and provide a robust direction for coastal planning and management, the 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 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 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:

Developing a regional interpretation of the VCS implies the need to identify priority coastal issues – from among those flagged in the VCS – for each region. It also implies an obligation to use the best available information to address these issues.

In contrast to the draft Central Regional Coastal Plan, the draft Western Regional Coastal Plan does not specifically identify regional priorities, other than by implication.

Hence there is an opportunity to clarify and strengthen regional priority directions in the final document. We also note that there are no outcomes listed within the existing Action tables compared with the draft Central Regional Coastal Plan.

**We recommend that explicit regional priorities be identified and confirmed and that actions and outcomes be listed.**

Contributions from existing CAPS

We note Appendix 2 and priority recommendations from the CAP Review [2012]. However the Plan does not mention any positive actions or achievements from previous/current CAPS.

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

Introduction section and The Plan at A Glance:

This section, together with the other maps and decision trees, provides good information throughout the document. In particular the Hierarchy of Principles [page 3] and *The Coastal Management Act 1995* hierarchy [figure1] provide important context. We note the important reference to Integrated Coastal Zone Management. [ICZM]

**These should be retained.**

Section 1.3

We also support Section 1.3 “Why have a Regional Coastal Plan”.

**However a stronger link from the Hierarchy of Principles section to other parts of the document would be helpful.**

The draft Western Regional Coastal Plan contains a number of worthwhile actions, on topics such as coastal visitation, foreshore management, flooding and erosion and implementation. The inclusion at 4.3 of the Draft Shipwreck Coast Master Plan is a good initiative.

However **we recommend the inclusion of a key action to carefully examine the Shipwreck Coast Master Plan and its recommendations in relation to the potential impact on natural coastal and marine systems, important bird areas, flora and fauna, ecosystem migration landwards and habitat linkages.** The nominated actions do not achieve this. They are focussed on visitation.

Coastal Values – Chapter 2

We note an omission of Actions for this section compared with Chapters 4-7.

This section discusses environmental values, marine, foreshore and hinterland ecosystems.

**We support the inclusion of Figure 3** which highlights the connection across catchments, coasts and marine areas. Although very busy it successfully highlights the many and varied users/ uses of the coast.

**We recommend:**

**-The retention of the case study “Economic benefits of the region’s caravan and camping parks.” and its link to ecosystem goods and services is supported.**

**- that a separate map be included which focusses on natural ecosystems, under represented ecological vegetation classes, rare or endangered species habitat areas, salt marsh and seagrass beds.** This visualisation would provide a map of our natural assets at a glance.

**- that ecosystem services be highlighted and actions included to reflect their values. This to include identification and assessment financially of each service for the region.** [refer to VCS page 12 “ non – commercial values”]. Recognition of their financial contribution should be noted in the section on Economic Values.

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

**-Supporting actions from the Regional Catchment Strategies and the draft Waterway**

**Management Strategies that focus on improving water quality in estuaries, embayments and coastal waters.**

3. The Dynamics of the Coast: Valuing the Environment and Integrated Marine Planning

We note an omission of actions and outcomes table for this section also.

**We strongly recommend:**

**-including an Action table with outcomes for this Chapter**

**-to include within the Action table an analysis of the G21 and Great South Coast Regional Growth Plans in relation to the potential and current impact on the coast from their recommendations.**

We note that the draft Plan seems to consist mainly of a series of very broadly expressed actions to be carried out by State agencies or local government. .

**We suggest that the broad actions be complemented by additional direction, information and expected outcomes. This would provide clarity on the Plan’s intent, identify the opportunities and resources needed and enable funding to be sought.**

**- 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.**

Use of research and policy documentation:

ACS Victoria is aware of a number of significant research or policy development documents which are available to guide and inform coastal and catchment planning. These include: “Estuarine Wetland Vegetation Mapping” ARI 2008; “Submerged Aquatic Vegetation in Estuaries of the Glenelg Hopkins Catchment” DEPI 2009 and “The Natural Resources Management Plan for Climate Change for the Glenelg Hopkins Region GHCMA 2015 [in prep].

**We recommend that the above research and policy documentation be used and referenced to inform the final Plan.**

**6. Regional Scale Planning for Coastal Flooding and Erosion**

Section 3.1 Natural coastal processes is a good statement of coastal processes and hazards, but 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. We recommend that:

**-An additional issue 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.**

**-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.**

**-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 is a lack of understanding of coastal processes in Victoria. We need to identify to what we are adapting and why. New South Wales has achieved some long term monitoring for the

coast.

**Include as a key priority the review of existing monitoring and its outcomes plus the development of a strategic, adaptive, long term monitoring system, together with the resources needed.**

**-ACS Victoria supports the use of ‘coastal cells’ as a basis for planning.eg Coastal Sediment Compartments.**

#### **Chapter 4 – Managing Regional Visitation Pressures and Maximising Access**

It is acknowledged that visitor demand is a growing problem for some sites in the region. Visitation actions for these areas will be dependent on vulnerability, affordability and seasonality of use.

For highly vulnerable landscapes and sites we recommend:

**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 17 Chapter 4 .Visitation Actions [3 . [d] ] be added. This section would identify highly vulnerable parts of the landscape and habitat areas where no visitation occurs or is restricted.**

**- ACS Victoria supports the other visitation actions, subject to recognition of the VCS Hierarchy of Principles.**

**--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.

#### **Chapter 6 – Regional-Scale Planning for Coastal Flooding and Erosion (pp.21-25)**

-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.**

#### **Chapter 7 – Supporting Communities Caring for the Coast**

**-ACS Victoria endorses the proposals for more support for citizen science, such as beach monitoring, and the commitment to biennial conferences to bring together scientists, coastal planners and managers, members of community groups and interested individuals. Experience indicates that previous conferences run by the Western Coastal Board were very well received.**

Thank you for the opportunity to comment on the draft Western Regional Coastal Plan. Should you require further information please contact me on [REDACTED]

Yours faithfully

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