

In reply please quote: FC2015/02333
Enquiries to: [REDACTED]

18 March 2015

[REDACTED]

Dear [REDACTED]

DRAFT WESTERN REGION COASTAL PLAN – WANNON WATER COMMENTS

Wannon Water welcomes the opportunity to have further input to the Western Regional Coastal Plan through this submission.

Major omissions

- The word “fire” does not appear in the document. Fire risk management (particularly on coastal crown land) should be integrated into management plans as per page 22 of the Warrnambool Coastal Management Plan 2013. This is essential for the protection of communities and critical community assets. Liaison is required on this issue with key stakeholders (e.g. CFA, DELWP, Council, Parks Victoria, traditional owners, asset owners and the community).
- There is no reference to water corporations (i.e. Wannon Water and Barwon Water) or the concerns of water corporations anywhere in the document. Please incorporate Wannon Water’s concerns into the document as detailed in our previous correspondence April 2014 – see last paragraph of this letter for further details.

Suggested improvement:

Figure 1 shows that (as per the VCS 2014) several Coastal Management Plans are to sit under the Western Regional Coastal Plan which sits under the Victorian Coastal Strategy 2014. This is a different structure compared to the “Coastal Action Plan reviews 2012” and “Boating CAP review 2013” as published on the Western Coastal Board website. An explanation of how the old approaches are to be incorporated into the new structure should be given.

- Do the six “local CAPs” (dated 1998 to 2004) become Coastal Management Plans? (Note the Warrnambool CMP 2013 says it supercedes the Warrnambool CAP 1999 “which was essentially a CMP”.)
- Do the five “regional CAPS” (dated 2002 to 2010, including the Boating CAP) become part of the Western Regional Coastal Plan?



- Do the 519 actions in the ten CAPs (plus those of the Boating CAP) get translated across to the new structure? How?
- Where do Parks Victoria management plans sit in relation to Figure 1? Are they Coastal Management Plans?
- There are at least eight categories of Coastal Managers shown in Figure 5 (including DEPI fisheries). Not all of these have planning documents (as listed in Figure 5) that fit neatly into the structure of Figure 1. Please explain.

Specific Comment on the draft:

- Pages 2, 15: mention of the Western Victorian Boating Action Plan ~~2013~~ 2010: With reference to Figure 1, should this be an integral part of the RCP?
- Page 9: Wind energy is not “alternative” or “emerging”. It has been in the region for 15 years. Please state the economic value of existing and planned wind generation in the Western region.
- Page 10, second part of Figure 5: DELWP and its fisheries management plans should be listed here. The first entry for the Western Coastal Board should be replaced with “Western Regional Coastal Plan” (with no mention of previous regional CAPs if they are now replaced by the WRCP).
- Page 15: The regional approach to boating warrants a section within the RCP. Should similar sections be given to caravan parks, tourist facilities, car parking and traffic? These are regional issues warranting a regional approach and direction for CMPs is needed.
- Page 16: “The Draft Shipwreck Coast Master Plan” covers from “Princetown to Boat Bay”. Boat Bay is not on Google Maps – consider changing this to “From Princetown to Port Campbell including the Twelve Apostles”. Should this plan be listed in Appendix 1? Is it to be integrated into a CMP? Please discuss.
- Pages 17, 20, 25, 27: The action tables on these pages are not the same as the ones on pages 28 and 29.
- Page 23: Consider replacing the “muddy shores” diagram with a “sandy shore backed by rock” diagram.
- Page 28: Chapter 4 Action 1: What is a “visitation demand framework”? Needs explanation.
- Page 28: Chapter 5 actions 4 and 5: These should be moved to before Action 3 and reworded. Managers should work together to review the number and locations of coastal management plans that are needed in the Western Region (say by late 2015), and to commence preparation/update of coastal management plans, to provide complete coverage of the region (say by mid 2016).
- Page 28 column 1: “The Board will report annually to the Victorian Coastal Council on progress and this Plan will be reviewed in 2020”. Does this need to be translated across to a Table called “Chapter 8: Reporting Actions”? This review should be coordinated to be just after the review of the VCS and just before the review of CMPs.
- Page 30: The reference to CAPs in the text is not consistent with the hierarchy shown in Figure 1.



- Page 30: Table 1 Coastal Management Plans: in light of the number of foreshore managers shown in Figure 8 and the hierarchy shown in Figure 1", should there be more than three of these?
- Page 30: Table 1. The Warrnambool Coastal Management Plan is dated 2013 not 2014. Also the "status" column in the table as it stands could be deleted.
- Page 31: Table 3. Other Coastal Plans. Are some of the listed documents better referred to as "background reports"? Are any of the listed documents actually "Coastal Management Plans"? The list of documents seems incomplete, e.g. the Gellibrand estuary management plan and the Shipwreck Coast master plan are not listed, and the Glenelg Hopkins River Health Strategy is superceded. "Status" in the last column is confusing. Perhaps "date released" would be more relevant.
- Page 32: CAP review recommendation 7b: This calls for a dedicated municipal section to be added to Chapter 5. What can we learn from the Warrnambool Coastal Management Plan 2013?
- Page 33. The reference to Figure 8 should be replaced with Figure 9. The table entry for Otway National Park is identical in columns 2 and 3.
- Page 34. The third entry in the table calls for more discussion on potential threats to the environment throughout Section 2.1.

It was good to meet you at the practitioners workshop on 6 March. You asked for a description of Wannon Water assets that are on the coast. We operate Water Reclamation Plants with associated ocean outfalls at Warrnambool, Portland and Port Fairy (our other Water Reclamation Plants are linked to irrigated pasture and water recycling). The Warrnambool, Portland and Port Fairy facilities provide significant economic value to the region, cater for salty waste from food manufacturing and other industries, are sustainable, and are regulated by the EPA. The Warrnambool Water Reclamation Plant is on coastal crown land for which we are the Committee of Management. This is within 200m of the high water mark, which makes us a "foreshore manager". We operate water and sewerage reticulation pipes and sewer pump stations along the foreshore in Warrnambool, Portland, Port Fairy, Peterborough and Port Campbell, and also in the coastal hinterland of these towns. The Portland Bald Hill bores, treatment plant and water storage, and the Portland Water Reclamation Plant are in the coastal hinterland, on crown land for which we are Committee of Management.

If you would like to discuss any of the above comments, please give me a call. Wannon Water would welcome the opportunity to participate in working groups to implement the Plan.

Yours sincerely

