



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

The Australian Coastal Society (ACS) Victorian Branch appreciates the opportunity to comment on the draft Gippsland 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 but is not incorporated within the Plan's title. **If this Regional Plan is to replace existing Coastal Action Plans the word, "Action" should be added.**

[b] The Plan states that it identifies and prioritises management actions but does not 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 that this issue be noted and actions identified to reduce a transitional planning risk where gaps in supportive and directional 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 Gippsland Plan does not identify regional priorities, other than by implication – through the matters on which it chooses to propose future actions. **Hence there is an opportunity to clarify and strengthen regional priority directions in the final document.**

The Plan at a glance:

This section, together with the other maps and plan logic decision trees, provides good information throughout the document. **It should be retained.**

The draft Gippsland Regional Coastal Plan contains a number of worthwhile actions, on topics such as coastal visitation, foreshore management, flooding and erosion and implementation. However, it appears to ACS Victoria to be rather limited in its scope and not clearly tailored to the needs of the Gippsland coastal region. **Broadening the scope and targeting proposed actions specifically for the Gippsland region would benefit the Plan.**

Contributions from existing CAPS

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.**

Valuing the natural environment and integrating marine planning

The draft Plan is focussed on foreshores and adjoining areas and gives limited consideration to actions to preserve or enhance environmental values, interactions between catchments and coasts, or maintaining the quality of the marine environment. In particular, it does not identify any actions related to the VCS key issues of 'Valuing the natural environment' and 'Integrating marine planning'. Its treatment of climate change is inadequate, although ACS acknowledges that this topic may have been difficult to discuss in detail, due to the attitudes of the previous Government. **The inclusion of an Action table and actions which show the link to the VCS Hierarchy of Principles together with actions that link to Plan objectives would improve this section.**

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 and that are (implicitly) expected to be dependent on funding from State Government. The actions are not presented in sufficient detail to enable regional bodies to use them as a basis for seeking funding from other sources (e.g. the Commonwealth, regional development programs, philanthropic bodies). **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.**

Use of research and policy documentation:

ACS Victoria is aware of a number of significant research or policy development documents prepared for the Gippsland Coastal Board, the State Government or other Gippsland regional agencies that could have made a major contribution to the draft regional coastal plan and provided more substantive direction. These include: the Gippsland Coastal Board's 2008 summary of Climate Change, Sea Level Rise and Coastal Subsidence along the Gippsland Coast; the Gippsland Lakes and Ninety Mile Beach local hazard assessment (which we understand is completed but not yet released); Ethos NRM's 2010 report on Coastal Assets of the Gippsland Coast (prepared for EGCMA); Worley Parsons' 2011 work on The Gippsland Land Coastal and Marine Asset-Based Framework (prepared for Gippsland Coastal Board); and Water Technology and Ethos NRM's 2013 update of the Gippsland State of the Coast report (prepared for Gippsland Coastal Board).

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

**Where the report mentions significant documents, such as the Gippsland Lakes Environmental Strategy, it should summarise their key findings and recommendations, instead of just acknowledging the existence and objectives of the strategy.**

ACS Victoria suggests that finalisation of the draft Gippsland Regional Coastal Plan should be delayed until the Gippsland Lakes and Ninety Mile Beach local hazard assessment is released and that the plan should be revised to include stronger direction and more explicit actions, derived from the local assessment and the other studies listed above.

Specific comments on sections of the plan are as follows:

#### Section 2.1 – Coastal Values (pp.4-6)

- **This section should recognise the interaction between catchments and coasts and discuss blue-green algae and other water quality issues in estuaries, particularly the Gippsland Lakes. It should describe the role and values of the wetlands of the Gippsland Lakes and the sea-grass beds and mangroves of Corner Inlet and the other marine embayments.** It might also mention the changes in marine species distribution being observed as a result of ocean warming.
- Given the Hierarchy of Principles prioritises the protection of the natural environment and values, **an additional map should be included in this section showing coastal values. It should include, significant marine environments, rare or threatened ecological communities, Ramsar sites and key shorebird habitats/"important bird areas".**
- Actions on environmental values could include:
  - **Planning for and progressively carrying out a benchmark survey of the environmental values of the Gippsland coast, to form a comparison for future monitoring.**
  - **Rationalising the dataset collated for the Gippsland Coastal and Marine Assets-Based Framework and establishing a process for regular updating of data layers.**
  - **Supporting actions from Gippsland Lakes Environmental Strategy, the Regional Catchment Strategies and the draft Waterway Management Strategies that focus on improving water quality in estuaries, embayments and coastal waters.**
  - **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 (though this is of less relevance to Gippsland).**

#### Section 3.1 – Natural coastal processes (p.10)/-3.2A A Changing Climate, Chapter 6 Regional Scale Planning

- Section 3.1 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:
- **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.**
- The Plan should also recognise the 'coastal squeeze' encountered by coastal ecosystems such as mangroves 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.**

- **ACS Victoria supports the use of ‘coastal cells’ as a basis for planning eg Coastal Sediment Compartments.**
- Recognition in the section on economic values of the values of mangroves and saltmarsh is welcomed. **The concept of ecosystem services and their financial contribution could be underlined and integrated in a number of other sections, including those on tourism and agriculture.**

### **Section 3.2 – A changing climate (pp.10-11)**

- This section is quite weak, as it does not include any quantification of the changes that the region may be facing. Unlike the draft Central Regional Coastal Plan, the Gippsland plan does not even acknowledge the planning benchmarks for sea level rise included in the VCS and the Victoria Planning Provisions. **We recommend that quantification of the changes that the region might be facing be explored. We strongly recommend the inclusion of the planning benchmarks for sea level rise included in the VCS and Victoria Planning Provisions be included.**
- The report recognises some of the work done on climate change and coastal hazards in Gippsland, but there are other relevant projects not mentioned (e.g. the two NCCARF-funded projects on ‘What would a climate adapted coastal settlement look like in 2030?’ carried out by Monash University and Canberra University-ANU).
- Overall, **we recommend much more use made of the findings and recommendations of the previous studies, in order to identify priorities and provide direction within the plan, rather than at a distance in time.**

### **Chapter 4 – Managing Regional Visitation Pressures and Maximising Access (pp.13-16)**

- ACS Victoria is concerned the plan seems to devote a lot of attention to matters that are not major issues in Gippsland, or are limited to specific areas or very short time periods. One example is the stress on needing to manage regional visitation pressures and maximise access.
- It is acknowledged that visitor demand is a growing problem for some sites in the west of the region, influenced by metropolitan and ‘overflow’ development in close proximity. In these locations, there might be opportunities to spread use by providing additional facilities.
- Much of the rest of Gippsland consists of remote or semi-remote coast. Visitor pressures and overcrowding are experienced at peak periods, but these are generally of short duration. Visitation actions for these areas will be dependent on vulnerability, affordability and seasonality of use.
- For highly vulnerable landscapes and habitats- **We suggest 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 16 Chapter 4 .3 [3.[d] ] be added. This section would identify highly vulnerable parts of the landscape and habitat areas [important bird areas] for example where no visitation occurs or is restricted.**
- **ACS Victoria supports the other visitation actions, assuming they are a priority for the region or a significant part of it and recognise the hierarchy of principles.** However, we note that they have very long timeframes. The same actions in the draft Western Regional Coastal Plan are expected to be complete several years earlier.

### **Section 5.1 – A Regional Approach to Foreshore Management (pp.17-20)**

- The emphasis on the need to improve governance, oversight and support for foreshore Committees of Management does not seem to recognise the situation in Gippsland,

particularly eastern Gippsland. East Gippsland Shire is the Committee of Management for all urban foreshore and lakeshore reserves in that Shire, and Wellington also manages many of its urban foreshores and lakeshores. The Shire-based management models appear to work well. Parks Victoria manages nearly all the open coasts, sometimes in conjunction with traditional owners, while the Department of Environment, Land, Water and Planning controls most of the non-urban lakeshores. It is only in South Gippsland Shire that citizen-based Committees of Management predominate. There is a strong tradition of cooperation between the foreshore management agencies and with other regional bodies such as Gippsland Ports and the Catchment Management Authorities.

- **ACS Victoria supports the proposed amalgamation of Committees of Management in the Waratah Bay-Shallow Inlet area.** Bringing the Corner Inlet Marine and Coastal Park under the National Parks Act would also assist in rationalising management boundaries in that area.
- With regard to the proposed regional approaches to foreshore management, ACS Victoria **supports the aim of having Coastal/Foreshore Management Plans for all urban foreshores and lakeshores**, but does not consider such plans to be necessary for areas of foreshores in national parks or other reserves. Additional resources may need to be supplied for smaller Committees of Management to prepare management plans.
- **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.**
- However, this section needs strengthening. **We recommend that use be made of the work that the Gippsland Coastal Board and others have commissioned over the past 10-15 years.**
- The actions in this section should be much more specific and have shorter timeframes. **We recommend identifying priority areas for local coastal hazards assessment sooner, rather than in 12-18 months' time.**
- Existing information (e.g. the NCCARF-funded studies) indicate that the Walkerville-Waratah Bay-Sandy Point-Shallow Inlet area and Mallacoota Inlet should also be identified as vulnerable locations. **We request that they be included in the list of vulnerable locations.**
- **ACS Victoria supports the actions identified in Chapter 6 but notes that significant additional funding and technical resources will be required to carry them out.**

#### 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 Gippsland Coastal Board, the Gippsland Lakes Taskforce and other related agencies were very well received.

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

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