

General

I am very pleased to see the release of this over-arching Regional Coastal Plan, for which the Gippsland Coastal Board has been advocating for many years. It contains a number of worthy initiatives and proposed actions that have the potential to improve coastal management in Gippsland.

Overall, however, I am disappointed in the draft.

While I appreciate that the Department of Environment, Land, Water and Planning (formerly DEPI) has tried to achieve a measure of uniformity between the plans for the three coastal regions, the draft has a generic feel that is not well adapted to Gippsland, especially East Gippsland. Some examples are noted in the detailed comments below. There is an apparent assumption that problems existing in other parts of the coast also occur here and therefore require (similar) solutions. This comment applies particularly to the stress given to defining levels of service for coastal access and to the need to coordinate coastal management, particularly foreshore management.

Of more significance is the failure to make better use of the substantial body of research and policy work commissioned by the Board and other Government agencies over the previous 10 years, as well as relevant academic and consultant reports. The result is a plan that lacks substance and seems to consist mainly of promises to do things that the plan itself ought to do. It was my understanding that the regional coastal plans were intended to provide a regional interpretation of the Victorian Coastal Strategy (VCS) and make a major contribution to its implementation. I am not convinced that this draft achieves that.

Furthermore, the draft plan concentrates excessively on foreshores and the areas immediately adjoining them and does not deal effectively with catchment-coast interactions, the Gippsland Lakes, or the marine environment. It is also weak on environmental management, with no actions identified for protection of environmental values.

The plan seems to have been prepared in the expectation of a lack of funding to implement its recommendations and has therefore adopted a 'let's not try to do too much' approach. While a clear sense of priorities for immediate action is essential, the identification of long-term needs should not be constrained in this way. Also, the plan should recognise that there is more than one source of potential funding (different programs, different levels of Government, the philanthropic sector, etc.). Planning documents of this nature need to operate as a 'prospectus' to guide investment from a range of sources, by identifying work that is of importance to the region. Similarly they need to provide clear planning direction that can be used to support arguments in public forums, such as Council meetings, Panel hearings, or Victorian Civil and Administrative proceedings about whether proposed developments are consistent with the intentions of the plan. More work is needed to make the plan useful for these purposes.

In addition, the reluctance of the previous Victorian Government to acknowledge the likely impacts of climate change seems to have inhibited any meaningful synthesis of the (now very large) body of research on climate change and the Gippsland coast and prevented any clear and definite directions being included in the plan. This should be redressed in the final version of the plan.

Detailed comments

p.iii

- This section contains a good summary of the values of the Gippsland coast, including the fact that it is nearly all public land. However, fails to acknowledge that some of the coastal reserves are narrow and at risk of being lost due to erosion and/or inundation. This should be a major focus of adaptation planning.
- I am not really convinced that 'loving the coast to death' is a major problem in Gippsland or that determining levels of service for access is THE priority in this region. This is discussed further below.
- Likewise, the stress on coordination of foreshore management agencies is less relevant in Gippsland. Parks Victoria (in association with Traditional Owners in some areas) manages nearly all the non-urban foreshores, DELWP manages non-urban lakeshores and local governments are committees of management for most of the urban foreshores (ocean and lakeshores).
- The concept of having Coastal/Foreshore Management Plans across different management tenures, with individual agencies preparing precinct or master plans under them, seems to involve another level of planning that I'm not convinced is needed in Gippsland.
- It is good that coastal flooding and erosion are identified as key issues, but I believe that the information is available in many areas to identify priorities now, rather than in the future.

p.2

- The draft plan records the key statewide coastal issues identified in the VCS, but has no actions relating to either Valuing the Natural Environment or Integrating Marine Planning.

p.3

- Figure 2 shows an incorrect colour for Foreshore Manager for Lakes Entrance and Mallacoota – should be purple, not yellow. [Note that it is correct in Figure 7, p.17]

p.4

- In the section on foreshore ecosystems, reference to moonah (not significant in Gippsland) should be removed. Sheoaks (several species of *Allo-casuarina*) are found here, but *Banksia* woodlands, mangroves and coastal heathlands are much more characteristic of the coastal vegetation of this region.
- Lake Tyers is a drowned river valley (ria) as well as Mallacoota Inlet.
- This section should include recognition of the interaction between catchments and coasts (see, for example, the map on page 7 of the draft Central Regional Coastal Plan) and a discussion of blue-green algae and other water quality issues in the Gippsland Lakes. It should also contain much more detail about the role and values of the wetlands of the Gippsland Lakes and the sea-grass beds and mangroves of Corner Inlet (in particular) and the other coastal embayments. It might also mention the changes in species distribution being observed as a result of ocean warming, e.g. game fish species such as marlin being caught off Lakes Entrance, the migration of the black sea urchin from NSW to Victorian waters and consequent effects on reef biodiversity and the abalone fishery.

- The sub-sections on environmental values would be considerably strengthened by use of material from the following studies:
 - Ethos NRM 2010, Coastal Assets of the Gippsland Coast (prepared for EGCMCA)
 - Worley Parsons 2011, The Gippsland Land Coastal and Marine Asset-Based Framework (prepared for Gippsland Coastal Board)
 - Water Technology and Ethos NRM 2013, Gippsland State of the Coast Update (prepared for Gippsland Coastal Board).
- 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 basis 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).
 - Developing a management framework for marine energy facilities is also an issue statewide, though probably of less relevance to Gippsland.

p.5

- Figure 3 is 'busy' and not very useful (the equivalent in the draft Central Regional Coastal Plan is more readable, but still of questionable value). It also appears to be very selective and potentially misleading in what it shows, for example, on what basis were the (few) 'Aboriginal Site of Significance' locations chosen?

p.6

- Section 2.2.1 The introductory paragraph and concluding paragraph are good. The treatment of Aboriginal cultural heritage is limited – it should acknowledge other traditional owner groups besides the Gunaikurnai, even if they have not been recognised as Registered Aboriginal Parties or had Aboriginal/Native Title claims approved.
- I am aware that the Heritage Council of Victoria pointed out to the Board that there has not been a systematic assessment of historic maritime infrastructure sites in Gippsland (unlike Port Phillip Bay and Western Victoria) and requested support for such a study, as an input to coastal planning. An action should be included in the final plan, along the lines of: 'Support provision of funding to Heritage Victoria to undertake a systematic assessment of historic marine infrastructure sites in Gippsland.'
- The Gabo Island and Wilsons Promontory light stations are on the Commonwealth Heritage List as well as the Victorian Heritage Register. Croajingolong National Park is identified as one of Australia's National Landscapes.

- I like Figure 4 on managing visitor satisfaction, particularly as it recognises that different responses are appropriate in different areas.

p.8

- It is good that the section on economic values identifies the ecosystem services provided by mangroves and saltmarsh.
- The draft plan refers to the 2006 Gippsland State of the Coast report but does not recognise the 2013 update (see above).

p.9

- Re Creating Better Coastal Places and Spaces – this was a good example of local government working cooperatively, but the Victorian Government funding should be acknowledged.
- Figure 5 – Question inclusion of ‘water quality hot spots’ and ‘algal blooms’ as environmental Community Coastal Values. Suggest just say ‘water quality’ and delete algal blooms (and deal with it in the appropriate part of the text). Mangroves and saltmarsh could be included in the list.

p.10

- Section 3.1 is a good statement of coastal processes and hazards, but should recognise the ‘coastal squeeze’ that mangroves and saltmarshes encounter when their ability to adapt to sea level rise (by moving inland) is blocked by seawalls or road embankments.
- The use of ‘coastal cells’ as a basis for planning is supported.
- It is good that 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).
- However, I would have liked to see a lot more use made of the findings and recommendations of these reports, in terms of identifying priorities for action as well as further consideration.
- Section 3.2 A Changing Climate is weak. See the Gippsland State of the Coast Update (reference above) for additional information that could be included.

p.11

- The plan does not really make the case that increasing population growth in Baw Baw and Bass Coast Shires and SE Melbourne will have a major impact on the Gippsland coast, other than the extreme west of the region. There are peak season pressures on boating infrastructure at sites such as McLoughlins Beach and Port Welshpool and traffic issues in some other places that may need particular attention. However, for most of Gippsland, the duration of intense visitor use is limited to a couple of weeks per year. In most cases, alternative sites are not available or could only be developed at unrealistic cost (both financial and environmental).

p.12

- The commentary about Port Anthony could point out that only the first stage of this project (a wharf) has been completed and expansion is likely to require an Environmental Effects Statement and approval under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*.

p.13

- The title of 'Managing regional visitation pressures and maximising access' is a bit of a worry. 'Maximising access' should not be a goal of the plan, but rather ensuring that access provided is consistent with the primary management aims of the sections of coast under consideration.
- The suggestion that levels of access (service) should be tailed to 'the resilience of the landscape' could be misinterpreted as referring only to the physical stability of sites, without consideration of its context, e.g. wilderness coast, etc. Some of the most resilient areas, in physical terms, are in the least altered areas and increased access may not be appropriate.
- Agree that the highest levels of access should be in activity nodes in association with urban areas.
- The Corringale Slips example is slightly misleading, as it is only camping that is controlled, not day visitor access.
- This section could refer to the Gippsland Lakes Sustainable Development Strategy (currently in preparation) that aims – amongst other things - to identify areas around the Lakes that could be suitable for new development.

p.15

- As with so many other studies/strategies mentioned, the draft plan describes the Gippsland Lakes Environmental Strategy but doesn't say anything about its conclusions or recommendations or how these relate to the Board's priorities.

p.16

- The visitation actions are supported generally, but some of them seem to have inordinately long time frames, e.g. map and categorise visitation infrastructure by 2018, identify priority areas for visitation demand management 2020, visitation demand framework by 2020. The same actions in the draft Western Regional Coastal Plan are expected to be complete several years earlier.

p.17.

- The report should recognise that some areas of lake shorelines are privately owned to high water mark (though probably none of the coastal foreshores?). Some of these areas, e.g. Shaving Point at Metung, always lacked a foreshore reserve, but in other locations, e.g. the northern shoreline of Jones Bay in Lake Victoria, the reserve has been eroded over time. The report should recognise the threat of progressive loss of coastal Crown land and identify this issue as a priority for adaptation research and policy development.

p.18

- The summary of the rights and responsibilities of traditional owners is good, but again, it should not imply that the Gunaikurnai are the only traditional owner group in Gippsland.

p.19

- The emphasis on the need to improve governance, oversight and support for Committees of Management – where this refers to foreshore CoM – is of marginal relevance to eastern Gippsland. East Gippsland Shire is the CoM for all urban foreshores (coastal or lakeside) in the LGA and Wellington for most of them in its area.
- Support the (implied) proposal for rationalisation of committees of management in the Waratah Bay-Shallow Inlet area.

p.20

- Support the aim of having current Coastal/Foreshore Management Plans for all urban foreshores and lakeshores, but this is probably not necessary or even desirable for those areas in national parks or reserves. Resourcing may be an issue for smaller CoM.
- Support the idea that Coastal Management Plans should also be able to be extended to other coastal land, including freehold land. This is essential for sensible planning for adaptation to climate change, especially for allowing ecosystems to adapt naturally (to the extent to which they are able). As noted above, there are areas where erosion has already reduced the width of foreshore reserves, or in some cases removed them altogether. Planning for retention or restoration of public ownership/access in key areas should be a priority.

p.21

- The section re regional scale planning for coastal flooding and erosion needs strengthening. While addressing existing flood and erosion risks is a priority, and also offers a less threatening way to engage the community regarding future changes, it is disappointing that this section makes very little use of all the work the Board and others have done in this area over the past 10-15 years, e.g. CSIRO, Water Tech-Ethos, CMA-sponsored studies, local hazard assessment, NCCARF-funded research programs, Melbourne University, etc.
- Agree with the last paragraph re the need for an integrated approach that takes account of storm surge, shoreline erosion and sea level rise.

p.22

- Figure 8. Existing information (including the NCCARF-funded studies) indicates that Waratah Bay-Sandy Point-Shallow Inlet and the Mallacoota area should also be identified as vulnerable locations.

p.25

- These actions should be much more specific and should have much shorter time frames. For example, why should it take two years to identify priority areas?
- Action (6)2 is supported but Councils will need significant additional funding and technical resources to carry it out.
- Action (6)3 is also supported, especially re erosion and the interaction between catchment-based flooding and coastal inundation.

- I suggest that finalising of the Gippsland Regional Coastal Plan should be delayed until after the Gippsland Lakes and Ninety Mile Beach local hazard assessment is released, so that its factual material, findings and recommendations can be incorporated.

p.26

- I like the proposals for more support for citizen science, such as beach monitoring (as is being done in Port Fairy).

p.27

- Strongly support the commitment to biennial conferences. Those convened by the Board in the past were very well received by interested individuals and organisations in Gippsland.
- Also support participation in / support of other coordinating groups such as Corner Inlet Connections and assistance to Coastcare for monitoring.

p.29

- The reference list underlines the lack of Gippsland specific content in the plan (although some of the major reports are listed in Appendix 1 on pp.30-31, they do not seem to have been used).

p.31

- Appendix 2. Note that 'Phillip Island to Inverloch' and the desalination plant are not in the Gippsland coastal region.
- Why are the Gippsland Lakes and Corner Inlet Ramsar sites not listed under Environmental?

p.32

- The VCS actions re marine areas and water quality hot spots are not carried through effectively in the draft regional coastal plan.
- The action 'Develop regional coastal risk assessments' seems to imply more than just a commitment to doing it sometime in the future. More use should be made of what is already known.

