

20 March 2015



Re: Draft Gippsland Regional Coastal Plan for comment

West Gippsland Catchment Management Authority (WGCMA) would like to commend the Gippsland Coastal Board on their Draft Gippsland Regional Coastal Plan. To assist in finalising the plan responses to the guiding questions are provided below for consideration.

1. The draft plan identifies a range of environmental, social and economic values that are important in the Gippsland coastal region. **Are these the most important values? Is there anything you think is missing?**

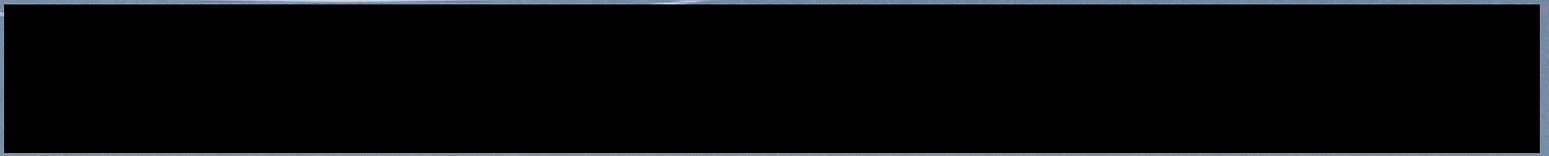
On Page 9 under **Community Coastal Values**, 'algal blooms' are listed as an Environmental value. Suggest changing wording to 'algal communities', as the term 'bloom' suggests an overabundance of algae (i.e. cyanobacterial bloom).

2. The draft plan identifies important issues affecting the coast in this region. Some of these are the same issues that the Victorian Coastal Strategy identified as affecting the whole state, while others are particularly important in this region. **Do you think these are the most important issues affecting the region? What other issues do you think are important in this region?**

Natural Coastal Processes: The Draft 90 Mile Beach and Gippsland Lakes Local Coastal Hazard Assessment has determined that the sandy dunal system that makes up the 90 Mile Beach is susceptible to landward movement due to sea level rise. Therefore as a result of the erosion and depositional process, the land behind the dune systems will be covered by the landward movement of sand. Private land tends to be located behind the primary dune system and this will be impacted over time.

Acid Sulfate Soils: It is noted that the topic of Coastal Acid Sulfate Soils is an omission in the Draft Coastal Plan. If these soils are disturbed they can react with oxygen and produce sulfuric acid, which can result in acidification of water and soil, de-oxygenation of water, poor water quality, dissolution of soil, rock and concrete, corrosion of metals and even resulting in fish kills. Much of the Gippsland coast has been mapped as containing 'Prospective Land' (i.e. land that has the potential to contain Coastal Acid Sulfate Soils). http://vro.depi.vic.gov.au/dpi/vro/vrosite.nsf/pages/soil_acid_sulfate_soils. The West Gippsland Regional Catchment Strategy contains an objective to minimise disturbance of acid sulfate soils in the landscape and an action to develop and implement a public education program to raise awareness of the implications of disturbing potential acid sulfate soils. We therefore suggest including reference to Coastal Acid Sulfate Soils in the Gippsland Regional Coastal Plan.

3. The draft plan suggests a number of priority actions that could be implemented to better manage the coast in this region. These suggested regional-scale actions are intended to complement action by others at the statewide level and the local level, so they are not comprehensive and they don't duplicate the good work that others are already doing. **Are these the right actions needed to address the important coastal issues in this region? What other actions could the plans propose that would help address these issues?**



In principle WGCMA is supportive of the majority of actions that CMAs have been listed as partner agents against.

Suggested amendments to Chapter 6 are provided below for consideration.

Chapter 6 - Regional Scale Planning for Coastal Flooding and Erosion and associated Flooding and Erosion Actions.

Coastal inundation is well understood along the Gippsland coast within the WGCMA region. The VCID has provided a very good understanding of the existing inundation risk and the future inundation risk associated with sea level rise. The WGCMA has recently done hydrodynamic modelling in Corner Inlet which has shown that the VCID provides sufficient information for both strategic and statutory planning.

Therefore it is recommended to strengthen Chapter 6 by stating that where the VCID has mapped existing and future storm tide inundation this should be included in Council Planning Schemes now so that existing and future owners are aware of and can start managing the risk of coastal inundation.

Justification: The VCID has recently been used by Bass Coast Shire to inform their recent update to the flood controls within their Planning Scheme. The Panel Report for amendment C82 recommended:

(v) Recommendations

- 1. Apply LSIO boundaries in urban infill areas that correspond to sea level rise of 0.2m by 2040 as shown in revised Post Exhibition LSIO Mapping tabled at the Hearing.**
- 2. Apply LSIO boundaries in greenfield areas (outside township boundaries) that correspond to sea level rise of 0.8m by 2100 as shown in revised Post Exhibition LSIO Mapping tabled at the Hearing.**
- 3. Make further amendments to the LSIO as required when further, more detailed modelling information becomes available.**

It is also desirable to obtain consistency both within and across local government areas in the application of the VCID to inform flood controls within their Planning Schemes, using the best available science.

While the WGCMA is generally supportive of the proposed Actions in Chapter 6, we believe that a lot of the work has already been done to understand Coastal Inundation risk and given this the actions and their timelines can realistically be achieved more quickly than proposed.

The WGCMA suggest the following changes to the proposed **Flooding and Erosion Actions** and timelines:

1. Develop a systematic approach **and** identify regional priorities for adaptation plans by 2016
2. **Develop at least three adaptation plans for identified priority areas** by 2018
3. Develop methodologies for **integrating flood studies with** erosion studies in coastal areas by **2016**
4. **Based on the three priority adaptation plans** determine the nature of the desirable outputs of those studies by **2018**.

Those outputs may include:

- a. draft components for municipal emergency plans;
- b. draft planning scheme amendments;
- c. viable mitigation options (if any); and
- d. viable long term options for retreat (if necessary)

4. Is there anything else that you think we should consider in finalising the draft plan?

Within the Chair's Foreword: *"How do communities plan for coastal flooding in a way that makes sense to them but doesn't leave future generations with a debt they can't pay?"*

WGCMA Comment: Agreed. We need to start work now to ensure we don't place further development in areas known to be at risk and we also need to start working on adaptation plans to allow a logical and time sensitive approach to dealing with the existing level of risk.

Within the Executive Summary: *'Gippsland's coastal communities expect management agencies to work with them to plan and manage coastal flooding. Coastal erosion and coastal flooding risks can also be considered at the regional-scale. A systematic approach to addressing these issues will help us to find appropriate adaptation responses. The first step is to identify priority areas to carry out detailed flood and erosion studies to help evaluate adaptation options.'*

WGCMA Comment: The Victorian Coastal Inundation Dataset (VCID) can expedite this process as it has detailed mapping for the existing and future risk of storm tide inundation. Recent hydrodynamic modelling done by WGCMA for Corner Inlet has shown that the inundation extent estimated by the VCID is reasonably accurate and provides a good understanding of the risk along the Gippsland coast within the WGCMA region.

Hierarchy of Principles: *'When the above principles have been considered and addressed: – Ensure development on the coast is located within existing modified and resilient environments where the demand for development is evident and the impact can be managed.'*

WGCMA Comment: The WGCMA supports the principle of locating development within existing and resilient environments. Many Gippsland communities within the WGCMA region are vulnerable to coastal inundation under existing conditions and this risk will increase significantly as sea levels rise. It is important that the VCID is used to include this information in planning schemes so that development can be managed appropriately in areas of known risk.

Section 3.2 - A changing climate

WGCMA Comment: This section should be strengthened to state that where existing coastal and future inundation is mapped (i.e. the VCID) it should be included in planning schemes as LSIO so that existing and future owners are aware of and can start taking steps to manage coastal inundation risk. In addition to this planning permit decisions made now need to make sure that the future risk is not increased in known flood hazard areas. This will ensure that adaptation plans deal with the existing level of risk rather than an ever expanding risk created by allowing inappropriate development. Please refer to the Central Regional Coastal Plan which has a discussion on benchmark flood levels for consideration in planning permit decisions.

Appendices (page 31) - Other Coastal Plans.

Please note that the West Gippsland Waterway Strategy 2014-2022 has been finalised and its status is 'Implementation'. Please amend accordingly.

We look forward to receiving the final version of the Gippsland Regional Coastal Plan and continuing to work with the GCB to achieve our common goals for the natural environment. By gaining alignment in implementation of the Gippsland Regional Coastal Plan, the West Gippsland Regional Catchment Strategy and the West Gippsland Waterway Strategy we will be truly supporting the intent of integrated catchment management.

If you have any queries in relation to the feedback provided, please do not hesitate to contact me on

Yours faithfully,

