



Hobsons Bay
CITY COUNCIL

Hobsons Bay City Council Submission to The Draft Victorian Coastal Strategy

2013

Executive Summary

1. The Victorian Coastal Council (VCC) released the draft Victorian Coastal Strategy, 2013 (draft VCS) on the 11th September 2013 in accordance with the *Coastal Management Act 1995* (VIC) (Coastal Act) which requires a review of the Victorian Coastal Strategy (VCS) every five years.¹ The draft VCS is required to provide for the long term planning of the Victorian Coast to:
 - a. Ensure the protection of significant environmental features;
 - b. Provide clear direction for the future use of the coast, including the marine environment;
 - c. Identify suitable development areas and development opportunities; and
 - d. Ensure the sustainable use of natural coastal resources.²
2. Hobsons Bay City Council's (the Council) submission provides an overview of the municipality and is then sectioned into 'General Commentary,' 'Key Issues,' 'Principle Specific Commentary' and 'Implementation.' The Council is supportive of the draft VCS as it provides a framework for coastal planning for the State of Victoria. It provides a good strategic framework for the protection of the coastal environmental and identifies changing climate as a particular issue for the coast. It will assist the Council in creating a number of policies particular to Hobsons Bay.
3. However, further clarification is required on the roles of planning and management agencies and how they interact and coordinate with each other. There are also concerns relating to resource allocation at a local and state level to ensure authorities can carry out the actions within the draft strategy.
4. The Council appreciates the opportunity to submit to this process and looks forward to further helping guide coastal consideration and planning.

¹ Victorian Coastal Council (VCC), Draft Victorian Coastal Strategy (draft VCS), 2013, page 6.

² VCC, draft VCS, 2013, page 5.

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The municipality in context

5. The municipality of Hobsons Bay (the municipality) is situated approximately seven to 20 kilometres south west of the Central Business District (CBD), covering an area of 66 square kilometres. The municipality has a population of 87, 360 people which is forecast to increase by 17% (14, 864) by 2031.
6. The municipality is located at the north western end of Port Phillip Bay and is home to the suburbs of Altona, Altona Meadows, Altona North, Brooklyn, Laverton, Newport, Seabrook, Seaholme, South Kingsville, Spotswood, Williamstown and Williamstown North.³
7. The community loves the municipality for its proximity to the CBD, the beach, its parks and green spaces, its vibrant atmosphere and sense of community, its character housing and above all its people, which makes the area almost the ideal place to live for many.⁴
8. The municipality has:
 - Three Activity Centres (ACs) (previously known as Major Activity Centres), at Altona, Altona North and Williamstown. Two of which are along the foreshore and may be impacted by coastal hazards as a result of a changing climate. Due to the location of the municipality the opportunity to relocate to higher ground is not possible. Adaption measures to ensure resilience are key to future proofing the municipality.
 - Over 20 kilometres of beaches and foreshore areas; it is home to significant coastal wetlands, five creek systems, remnant native grasslands, and important flora and fauna habitats, making up 24 per cent of the municipality's land area. Compared to the metropolitan average of 15 percent.⁵
 - The historic seaport of Williamstown, one of the oldest settlements in Victoria, a range of historic buildings as well as recently developed residential areas.⁶
 - A coastline that caters for various on water sport and recreational activities such as sailing, boating, fishing, kite surfing, jet skies, sea kayaking and canoeing.
 - The Cheetham Wetlands (which are Ramsar wetlands) are located within the municipality and are managed by Parks Victoria. However it is expected that the expanding saltmarsh will encroach onto adjoining Council land.
 - Two swimming beaches along the western section of the coastline at Altona and Williamstown.

³ Hobsons Bay City Council (HBCC), *Hobsons Bay Community Health and Wellbeing Plan 2013-2017* (CHWP) (June 2013) Community Health and Wellbeing Plan 2013-2017, http://www.hobsonsbay.vic.gov.au/Council/Policies_strategies_plans/Social_Policies_and_Plans/Community_Health_and_Wellbeing_Plan_2013-2017, page 15.

⁴ HBCC, *CHWP* (June 2013) Community Health and Wellbeing Plan 2013-2017, http://www.hobsonsbay.vic.gov.au/Council/Policies_strategies_plans/Social_Policies_and_Plans/Community_Health_and_Wellbeing_Plan_2013-2017, page 15.

⁵ HBCC, *CHWP* (June 2013) Community Health and Wellbeing Plan 2013-2017, http://www.hobsonsbay.vic.gov.au/Council/Policies_strategies_plans/Social_Policies_and_Plans/Community_Health_and_Wellbeing_Plan_2013-2017, page 15; HBCC, *Council Plan 2013-2017* (June 2013) Community Health and Wellbeing Plan and Council Plan, http://www.hobsonsbay.vic.gov.au/Council/Policies_strategies_plans/Community_Health_and_Wellbeing_Plan_and_Council_Plan, page 14.

⁶, *CHWP* (June 2013) Community Health and Wellbeing Plan 2013-2017, http://www.hobsonsbay.vic.gov.au/Council/Policies_strategies_plans/Social_Policies_and_Plans/Community_Health_and_Wellbeing_Plan_2013-2017, page 15.

Map one illustrates the Hobsons Bay foreshore.

Map one: The Hobsons Bay Foreshore



General commentary

The Vision and Purpose

9. The vision of the draft VCS is *'a healthy coast enjoyed by all now and in the future.'*⁷ The vision for the 2008 VCS was *'A biologically and culturally rich, diverse coastal, estuarine and marine environment that is for its protection, sustainable use and enjoyment today and for future generation.'*⁸ The draft VCS simplifies the vision which can now be interpreted as having less emphasis on the environment, its protection, management and maintenance.
10. The purpose of the draft VCS is to provide guidance for agencies and statutory decision making; provide a framework for the development and implementation of other plans such as Coastal Action Plans (CAPs) and a coastal context for the development of related strategies like Regional Catchment Strategies and planning schemes.⁹

Policies to Consider

11. The draft VCS includes the provision of a framework for the development and implementation of other plans such as Coastal Management Plans and CAPs, it is expected that the integrated CAPs that each Regional Coastal Board has to prepare will align with the finalised VCS.¹⁰ It also includes a coastal context for the development of related strategies like Regional Catchment Strategies, planning schemes and Regional Waterway Strategies.¹¹
12. A coordinated approach to coastal planning is encouraged as noted by the draft VCS in its consideration of other initiatives. Consequently the draft VCS and finalised VCS are expected to also consider the recently released draft of 'Plan Melbourne: Metropolitan Planning Strategy' (Plan Melbourne) and Regional Plans; in particular the Great South Region, the Gippsland region and the G21 – Geelong Regional Alliance plans.¹² The draft VCS and finalised VCS are also expected to link to plans such as the Victorian State Disability Plan and other relevant State Government policies and initiatives.
13. The Minister has set up the State Planning Policy Framework (SPPF) Review Advisory Committee which has the task of advising on the content and structure of the SPPF in light of recent and anticipated policy changes to stem from the finalised Plan Melbourne, the Regional Plans, reformed zones for Victoria and the Development Contributions System. It is anticipated that the finalised VCS will also consider/be considered by the SPPF Review Advisory Committee.¹³

⁷ VCC, draft VCS, 2013 page 3.

⁸ VCC, VCS, 2008, page 18.

⁹ VCC, draft VCS, 2013 page 7.

¹⁰ VCC, draft VCS, 2013, page 7.

¹¹ VCC, draft VCS, 2013, page 7.

¹² VCC, draft VCS, 2013, page 6; State Government of Victoria (State Government), Plan Melbourne: Metropolitan Planning Strategy (Plan Melbourne); 2013; Department of Planning and Community Development (DPCD), *Regional Growth Plans* (29 July 2013), <http://www.dpcd.vic.gov.au/planning/projects-and-programs/regionalgrowthplans>.

¹³ The Minister, *State Planning Policy Framework Advisory Committee Terms of Reference* (15 July 2013) State Planning Policy Framework Advisory Committee (SPPF Advisory Committee), <http://www.dpcd.vic.gov.au/planning/panelsandcommittees/current/state-planning-policy-framework-sppf>, page 1.

14. In addition, the Coastal Climate Change Advisory Committee (CCCAC) was set up by the Minister for Planning (the Minister) in 2009 with the purpose of investigating and recommending ways in which Victoria's land use planning and development controls can best support the management of coastal impacts as outlined in the VCS 2008.¹⁴ The CCCAC reported its findings in the CCCAC Final Report Volume One (December 2010). The recommendations and findings of this Report are relevant to the draft VCS and should be considered.¹⁵

A Clear and Coordinated Approach to Coastal Management

15. Management and authority arrangements for the coast remain inconsistent and unclear. This has a significant impact particularly on the protection, use, access, maintenance and policing on the coast.

16. The roles and responsibilities of all parties involved in coastal management and caring for the coastline should be more clearly defined, including Local Government Area (LGA) responsibilities. This will help clarify inconsistent management approaches to the Victorian Coast as unclear responsibilities create confusion, inconsistencies in planning, development, management and activities. The clarification of roles should also extend to enforcement and compliance with legislation.

17. Many different agencies involved in coastal management result in an overuse of resources. Any policy or proposals to address conflicts of use on the coast is a key gap in the draft VCS. In addition, state and federal funding streams are slowly diminishing; meaning LGAs are being required to take on the responsibilities of the State Government. Clarification of responsibilities would assist with addressing this matter.

Informed Decision Making

18. Land use planning is a key aspect of coastal planning. Greater capacity building is required within the planning profession in general to ensure that informed land use planning decisions are made when assessing planning applications and/ or preparing strategic plans and policies near the coast. This is particularly relevant when planning for land that may be subject to coastal hazard as a result of changing climate. Support for decision makers needs to be in place, for example, expert assistance provided by the VCC or the former Department of Sustainability and Environment, now the Department of Environment and Primary Industries (DEPI).

19. While this submission endorses the introduction of some form of land use control that addresses coastal hazard as a result of a changing climate, clear guidelines and or legislation need to be put in place and expert resources/assistance provided to make a well founded position. Town planning is a generalist position required to balance information provided by experts against other matters to come to a decision.¹⁶

¹⁴ Minister for Planning (Minister), *Coastal Climate Change Advisory Committee Terms of Reference* (19 May 2009), Coastal Climate Change Advisory Committee (CCCAC), <http://www.dpcd.vic.gov.au/planning/panelsandcommittees/recent-panels-and-advisory-committees/coastal-climate-change-advisory-committee>; page 1.

¹⁵ CCCAC, *CCCAC Final Report Volume One* (December 2010) CCCAC, <http://www.dpcd.vic.gov.au/planning/panelsandcommittees/recent-panels-and-advisory-committees/coastal-climate-change-advisory-committee>.

¹⁶ *Ocean Grove Bowling Club v Victorian Commission of Gambling Regulation* [2006] VCAT 1422 (11 July 2006) paragraph 9.

The Regional Coastal Boards

20. Regional Coastal Boards will have a key role to play in planning for their region as they are nominated by the draft VCS to develop Regional CAPs that will address issues and implement policy on the 'local level'. The capacity of the Regional Coastal Boards is unknown, therefore they need to be well resourced and have the capacity to deliver the proposed CAPs including the Boat CAP. The CAPs will be the key planning and management document for each region including the central region in which the municipality lies.¹⁷ However, clarity is sought as to where LGAs such as the Council will sit within the CAPs and whether or not they will have an influence on the CAPs and the decisions made by the Regional Coastal Boards. There is an assumption that LGAs will have an input in the Regional Coastal Board's planning exercises however the process for this to occur has not yet been defined.
21. It is important that the Council establishes how it interacts with the Central Coastal Board so it positively influences the development of the Regional CAP.

Other Commentary

22. At the outset it is noted that:

- The draft VCS is a higher level document and is less related to issues at a local level than the previous VCS. As a consequence, there is less clarity around the potential implications and outcomes of the strategy for local managers of the coast, specifically LGAs.
- There seems to be a focus on trade-offs (environment versus economic) rather than a focus on increasing benefits (environment, social/cultural, economic). The latter approach is encouraged.
- The Hobsons Bay coastline caters for various on water sport and recreational activities such as sailing, boating, fishing, kite surfing, jet skies, sea kayaking and canoeing. While the draft VCS discusses marine environments and activities that take place below the water, there is little discussion of recreation values, especially on water recreation. Consequently, clear directions around adaptation responses and recognition of recreation values is needed in the draft VCS. This could be included at the 'Importance of the Coast' section.¹⁸

¹⁷ VCC, draft VCS, 2013, page 7.

¹⁸ VCC, draft VCS, 2013, page 11-12.

The key issues

Adapting to a changing climate and increased coastal hazards

23. The draft VCS makes no mention of the changing climate in the six dot points in the introduction section but rather encompasses it within “adapt to coastal hazards”. It is likely that these points will be used to summarise the draft VCS. Although the draft strategy recognises the effect a changing climate will have on the coastline through many areas of the document, it is not specifically mentioned within the first dot point but rather encompassed under “coastal hazards”. A changing climate is expected to have implications on land use and development along the Victorian Coastline, particularly for the Council and other low lying municipalities. It is suggested that the first dot point specifically mention the impact of a changing climate when considering coastal hazards.¹⁹
24. As noted in the draft VCS, currently the SPPF has a benchmark for sea level rise under clause 13.01-1 of the Hobsons Bay Planning Scheme. However, there is currently no link from the SPPF into potential site specific land use controls such as a zone or overlay mechanism. Although the Minister did not accept the need for specific climate change planning zones or overlays recommended in the CCCAC Final Report Volume One; it is still maintained that such a mechanism is warranted and should be encouraged in the draft strategy. A zone or overlay provision under the Planning Scheme has the potential of clearly illustrating areas that should consider coastal hazard including coastal inundation (potentially as a result of a changing climate) and has the potential of setting area or site specific controls to ensure appropriate planning. It is fair, reasonable and good planning for such a mechanism to be in place.
25. The draft VCS makes no mention of the Melbourne Water (MW) flood levels as set out in the ‘Planning for Sea Level Rise’ Guidelines (the Guidelines). Table one provides the MW flood levels for the Bay and table two provides the MW floor levels for development close to the Bay which may be subject to a changing climate. The Guidelines set the finished floor level for the redevelopment of existing buildings or new buildings and apexes of the entry/ exit driveways of basement car parking within to 600 mm above the relevant 2040 flood level.²⁰

| Existing 100 year flood level | Applicable 2040 100 year flood level | Predicted 100 year flood level for 2100 |
|-------------------------------|--------------------------------------|---|
| 1.6 metres | 1.8 metres | 2.4 metres |

| Applicable 2040 100 year flood level | Existing Development Zone Floor Level | Isolated Residential/ Major Development Floor Level |
|--------------------------------------|---------------------------------------|---|
| 1.8 metres | 2.4 metres | 3.0 metres |

¹⁹ VCC, draft VCS, 2013, page 5.

²⁰ Melbourne Water (MW), *Planning for Sea Level Rise* (5 June 2012) Guidelines, <http://www.melbournewater.com.au/Planning-and-building/Forms-guidelines-and-standard-drawings/Pages/Guidelines.aspx>, page 3.

²¹ MW, *Planning for Sea Level Rise* (5 June 2012) Guidelines, <http://www.melbournewater.com.au/Planning-and-building/Forms-guidelines-and-standard-drawings/Pages/Guidelines.aspx>, page 2.

²² MW, *Planning for Sea Level Rise* (5 June 2012) Guidelines, <http://www.melbournewater.com.au/Planning-and-building/Forms-guidelines-and-standard-drawings/Pages/Guidelines.aspx>, page 3.

26. The Guidelines state that MW is the Water Authority pursuant to the *Water Act 1989* (VIC) (Water Act) and the floodplain management authority as per the *Planning and Environment Act 1987* (VIC) (P and E Act). In its role as the flood plain management authority, MW's function relates to flooding caused by tidal inundation; with a changing climate, tidal inundation is expected to be more severe and have a greater impact on the coast.²³
27. MW also commenced work with the Council in preparing a 'Flood Management Plan for Hobsons Bay and Melbourne Water' (Flood Management Plan).²⁴ The Council has adopted (at its Ordinary Council meeting of the 22nd of October 2013) the Flood Management Plan to determine key flood management planning, reduce risks of flooding and define the responsibilities of managing floods for both the Council and MW over the next five years. The Flood Management Plan will continually evolve as updated data becomes available to assist in the management of flood risks across Hobsons Bay. It includes a series of actions which will reduce the impact of flooding, including improving the local drainage network and consulting with residents who may be affected by flooding and educating them on the likelihood of flooding, and of actions and the support available to them.²⁵
28. The draft VCS notes that planning for sea level rise and coastal hazards will be assisted by the development of adaptation plans at a Local Government (LG) level. It is expected that these adaptation plans will be in line with the 'Victorian Climate Change Adaptation Plan'.²⁶
29. According to the draft VCS, coastal hazard assessments are being completed by the State Government for Port Fairy, Corio Bay/ Bellarine Peninsula, Western Port Bay and the Gippsland Lanes/ Ninety Mile Beach. The outcomes of these assessments will be used to guide the application of this approach at other locations.²⁷ Arguably of critical importance is the need to prepare an assessment for the whole of Port Phillip Bay. Regional assessments or assessments that only focus on a particular municipality can be ad hoc and do not guarantee accurate results. Mitigation works along one section of the Bay will impact other sections of the Bay; therefore a holistic approach is required. This should be a key action in the draft VCS or a desired outcome.

Managing Population Growth

30. There is an increasing demand for permanent residential dwelling locations along areas that interface with the coastline. In the majority of instances, these areas will be subject to some level of coastal hazard arguably as a result of a changing climate.
31. The draft VCS cites the use of landscape significance overlays as a means of managing population growth and defining settlement boundaries.²⁸ The purpose of these overlays is not to limit populations but rather identify areas where the development of land may be affected by environmental, heritage or flooding constraints.²⁹ This is not a mechanism to place a cap on population growth.

²³ MW, *Planning for Sea Level Rise* (5 June 2012) Guidelines, <http://www.melbournewater.com.au/Planning-and-building/Forms-guidelines-and-standard-drawings/Pages/Guidelines.aspx>, page 5; VCC, draft VCS, 2013, page 15.

²⁴ MW and HBCC, "Flood Management Plan for Hobsons Bay and Melbourne Water" (MW and HBCC, 2013) page 5.

²⁵ MW and HBCC, "Flood Management Plan for Hobsons Bay and Melbourne Water" (MW and HBCC, 2013).

²⁶ State Government, *Victorian Climate Change Adaptation Plan* (March 2013) Understanding Climate Change, <http://www.climatechange.vic.gov.au/adapting-to-climate-change/Victorian-Climate-Change-Adaptation-Plan>.

²⁷ VCC, draft VCS, 2013, page 16.

²⁸ VCC, draft VCS, 2013, page 18.

²⁹ Department of Transport, Planning and Local Infrastructure (DTPLI), *Environment Significance Overlay*, (4 September 2013) Victorian Planning Provisions, <http://planningschemes.dpcd.vic.gov.au/schemes/vpps>.

32. While it is tempting to place a population cap (or use a similar mechanism) on coastal settlements, such an approach is not endorsed as it has the potential to lead to long term impacts on the settlement.³⁰ The placement of population caps or thresholds on coastal settlements is not supported as this has the potential to have broad reaching impacts and create ageing towns that do not have a younger population to sustain regeneration and the continued life cycle of the town.³¹ The focus should be on managing the use and demand placed on coastal areas from residents and visitors through appropriate planning and management tools rather than population caps.
33. Increased population and development along the coast also increases the amount of stormwater runoff due to greater hard surface areas. This in turn impacts water quality and should be appropriately considered.
34. Increased built form along the coast and in coastal settlements also increases the number of dwellings at risk of being susceptible to flooding if a coastal flooding event takes place.
35. The draft VCS notes that the population of elderly people in coastal settlements and along the coast is increasing therefore creating vulnerable communities. Emergency Management Planning may require greater focus on the elderly. The use of the principles of universal design and appropriately designed infrastructure allows all ages and ability to use such infrastructure; reducing the need to retrofit changes in the future and/ or build additional infrastructure to cater for the different needs of people.³²

Understanding the Value of Natural Resources

36. The approach of creating a method for placing value on ecosystem services and natural resources associated with the coast is supported. However details of the proposed method of placing value needs to be transparent and subject to scrutiny. Such a method should be transparent and create a level playing field to enable comparisons by decision makers.³³

Integrated Approach to Marine Management

37. An integrated approach as suggested by the draft VCS is supported however greater cohesion between managing agencies is recommended as per the discussion at paragraph 15-17.³⁴

Financing Coastal Infrastructure and Management

38. The cost of maintaining and funding coastal infrastructure are increasing while State Government funding for these activities is diminishing. Increasingly there is shifting of responsibilities to local government from state government. The proposed research project on the capacity of entities to fund coastal management actions and future adaptation requirements is a good proposal, and it is in the Council's interest to actively participate in the research.

³⁰ VCC, draft VCS, 2013, page 18.

³¹ VCC, draft VCS, 2013, page 18.

³² VCC, draft VCS, 2013, page 18.

³³ VCC, draft VCS, 2013, page 19.

³⁴ VCC, draft VCS, 2013, page 20.

39. The use of Council rates as a potential funding mechanism for protection works is not supported. If such an approach is pursued, it creates uncertainty as to which properties will have increased rates – properties that have an interface with the coast (which already pay higher insurance premiums), properties within 500 metres of the coast and/ or the entire municipality.³⁵ It is unlikely that this approach will be supported by LGAs if not all coastal LGAs are levied.
40. It is noted that Plan Melbourne also suggests the use of rates to fund certain projects such as upgrading rail crossings. These suggestions essentially burden the community with supporting improvement to local infrastructure that has a regional benefit and therefore such an outcome is not equitable or fair to the local community of an area.
41. An alternative is to introduce a coastal levy, similar to the bushfire levy or the 'parks' levy on water invoices, over the State of Victoria. This ensures that all Victorians are contributing to coastal protection rather than a select few coastal municipalities. The Victorian coastline is used by all Victorians, not just those located in municipalities on the coast.

Balanced Decision Making

42. It is in the Council's interest to actively participate in the development of regional and local strategic plans. Regional Coastal Action Plans seem likely to be the mechanism used to address 'local issues' regarding decision making.

³⁵ VCC, draft VCS, 2013, page 21.

Principle specific commentary

Principle One: Value and Protect – Provide for the protection of significant environmental and cultural values

Appreciating the value of the coast

43. Developing and implementing environmental value measurement systems and environmental accounts that are consistent with international systems are supported provided that these measures are transparent and fair. This is also acknowledging that placing a dollar value on some ecosystems and habitats will be difficult.³⁶

Cultural Heritage

44. Aboriginal Coastal Heritage is an important matter to consider along the Victorian coastline as acknowledged by the draft VCS. A mechanism for addressing this is via the use of Cultural Heritage Management Plans (CHMP), however the draft VCS makes no mention of CHMPs required by the *Aboriginal Cultural Heritage Act 2006* (VIC).³⁷ The requirement for these plans are not well integrated into the planning system and need more defined triggers.

45. While a heritage overlay affords protection to built form of heritage significance, it does guarantee that this built form will remain. While, a heritage overlay ensures that heritage matters will be considered when assessing an application for a planning permit, the outcome of which may be the demolition of the heritage built form and the undertaking of a heritage study or placement of a plaque on site.³⁸

Marine Environments

46. A changing climate will have impacts on the marine environment, wetlands and estuaries as identified by the draft VCS.³⁹

Wetlands and Estuaries and Onshore Environments

47. The ongoing support of wetlands and on-shore natural environments are supported, the strategy provides a good policy framework for the ongoing management of these areas.⁴⁰ However, there are concerns regarding management tools.

48. The saltmarsh communities are predicted to recede inland due to the changing climate, this will result in an expanding area of saltmarsh. The Cheetham Wetlands (which are Ramsar wetlands) located within the municipality are managed by Parks Victoria, however the expanding saltmarsh will encroach onto adjoining Council land. Consideration of these areas and joint management plans need to be implemented as part of this approach to ensure there is a more holistic management of these areas.

49. In addition, there are concerns in the industry regarding the reliability of data on 'Natureprint.' The Catchment Management Authorities and LGs should have greater input and ability to obtain updated information. There are some areas where the conservation value is extremely high for a local setting but not considered high in a State context.⁴¹

³⁶ VCC, draft VCS, 2013, page 29.

³⁷ VCC, draft VCS, 2013, page 30-31; DPCD, *Aboriginal cultural heritage and the environment effects process: environment effects advisory note* (August 2007) List of Practice and Advisory Notes, <http://www.dpcd.vic.gov.au/planning/publicationsandresearch/practicenotes/list-of-practice-and-advisory-notes>, page 2.

³⁸ VCC, draft VCS, 2013, page 30-31; DPCD, *Practice Note 01: Applying the Heritage Overlay* (September 2012) List of Practice and Advisory Notes, <http://www.dpcd.vic.gov.au/planning/publicationsandresearch/practicenotes/list-of-practice-and-advisory-notes>, page 2.

³⁹ VCC, draft VCS, 2013, page 34.

⁴⁰ VCC, draft VCS, 2013, page 34-37.

⁴¹ VCC, draft VCS, 2013, page 36.

50. The discussion in the draft VCS in relation to enforcement for vegetation removal and encroachment onto Crown land is supported, this should also apply to Local Government land. However DEPI will need more resources to undertake further enforcement activities.⁴²

Catchments and water quality

51. There is in principle support for the principles and guidelines in this discussion. The Council will like to be involved in the development of the Environmental Management Plan for the Bay. Two key areas of interest for the Council are stormwater runoff and sewage and wastewater discharge.⁴³

Principle Two: Plan and Act – Undertake integrated planning and provide clear direction for the future

Supporting Community Participation

52. The discussion, policy and actions as per this section are supported.⁴⁴

Sustainable Coastal Settlement

53. The recent release of Plan Melbourne document encourages population growth in regional centres, this is anticipated to have some level of impact on coastal regional towns with these towns feeding into these larger regional centres (such as Geelong and Warrnambool). Plan Melbourne and the regional growth plans that affect the coast will have implications on how settlement boundaries are set. The regional plans for Great South Coast, G21 and Gippsland should inform work undertaken to outline settlement boundaries along the Victorian Coastline.⁴⁵

54. Consideration can be given to creating a more permanent boundary around settlements to limit the potential sprawl of towns. Dot point four of the policy for decision making outlines matters that should be considered when setting coastal settlement boundaries. Guidelines, a practice note or advisory note can be prepared which helps guide Councils and authorities in setting coastal settlement boundaries.⁴⁶

55. The draft VCS notes that coastal communities need to identify the characteristics of their town that they wish to protect. While it is anticipated that coastal communities will undertake this, greater reference and discussion about coastal built form, character and design is recommended in the draft VCS. This will in turn help guide expected future tourism and residential developments (as a result of amendments to the rural zones) in these coastal settlements.⁴⁷ The current design and siting guidelines are arguably outdated and should be reviewed with input from stakeholders including Coastal Councils.⁴⁸

⁴² VCC, draft VCS, 2013, page 37.

⁴³ VCC, draft VCS, 2013, page 38-39.

⁴⁴ VCC, draft VCS, 2013, page 41.

⁴⁵ VCC, draft VCS, 2013, page 42; Department of Planning and Community Development (DPCD), *Regional Growth Plans* (29 July 2013), <http://www.dpcd.vic.gov.au/planning/projects-and-programs/regionalgrowthplans>.

⁴⁶ VCC, draft VCS, 2013, page 43-44.

⁴⁷ VCC, draft VCS, 2013, page 43; DPCD, *Rural Living Zone* (15 October 2013)

<http://www.dpcd.vic.gov.au/planning/theplanningsystem/improving-the-system/new-zones-for-victoria/new-and-improved-rural-zones/rural-living-zone>; DPCD, *Rural Conservation Zone* (15 October 2013)

<http://www.dpcd.vic.gov.au/planning/theplanningsystem/improving-the-system/new-zones-for-victoria/new-and-improved-rural-zones/rural-conservation-zone>; DPCD, *Rural Activity Zone* (15 October 2013)

<http://www.dpcd.vic.gov.au/planning/theplanningsystem/improving-the-system/new-zones-for-victoria/new-and-improved-rural-zones/rural-activity-zone>.

⁴⁸ VCC, *Siting and Design Guidelines for Structures on the Victorian Coast* (May 1998) VCC Guidance Material,

<http://www.vcc.vic.gov.au/page/resources/guidance-materials>.

56. Dot point two under policy for decision making cites having regard to sea level risk and the impacts of a changing climate however there is little discussion in the principle as would have been expected.⁴⁹ This point can be moved into the coastal hazard and natural coastal processes section of principle two as this includes a discussion of coastal hazard and sea level rise.

57. Consideration should be given to potentially including the following as actions:

- Acknowledging the Minister's response to the CCCAC, the introduction of land use tools that address coastal hazard as a result of a changing climate into the VPPs to help strengthen the SPPF and provide more certainty for decision makers.
- Explore increasing the protection afforded to settlement boundaries via an urban growth boundary like approach.
- Have regard to the regional plans to ensure there is no clash in land use policies that affect the Victorian coastline.

58. Figure 5 provides a diagram of spatial location for Activity nodes and Recreation nodes on a 'typical' coastline. It is difficult to see how this would apply to Hobsons Bay; however it raises new activities and participation trends for the recreation use of the foreshore. Requirements for on-land and on-water activities such as kite surfing can cause further crowding of space and increase user conflict. This will be exacerbated if space is restricted by strictly confined development of nodes as per the diagram. The increased maintenance of these nodes and the ongoing viability of them will require careful consideration if they are strictly confined nodes with an increasing level of use.⁵⁰

59. The increased use of the coast in the summer does not simply impact the coastal asset but also place pressure on other incidental facilities and infrastructure such as water fountains, toilets, car parking, and rubbish collection etc. The increased need to maintain these facilities and infrastructure due to constant use is important to acknowledge.

Costal Hazards and Natural Coastal Processes

60. The commentary made at the 'Adapting to a changing climate and increased coastal hazards' section of this submission is relevant to the discussion at this section of Principle Two.

61. The proposed Actions are generally worthy of support, however there appears to be no specific recognition or actions to address the unique issues related to established urbanised metropolitan settlements. The suburb of Altona within Hobsons Bay is an example of a well settled residential suburb with low lying land susceptible to the effects of coastal hazards and natural coastal processes. The document is not specific on the range of issues that confront LGAs in maintaining and upgrading existing infrastructure (e.g. seawalls/ revetments) or on beach renourishment. It mentions planning for sea level rise for 2040 to 2100 but is not specific on 'contingency planning and responsibilities' between 2013 and 2040. Regional CAPs may be the mechanism used to address 'local issues for coastal adaptation and protection' however this is not specified in the strategy.⁵¹

⁴⁹ VCC, draft VCS, 2013, page 44.

⁵⁰ VCC, draft VCS, 2013, page 43.

⁵¹ VCC, draft VCS, 2013, page 45-46.

Balanced Decision Making

62. Given that LGAs maintain portions of the Victorian Coastline, these authorities should be involved in the development of business models as outlined in the actions section of balanced decision making.⁵²
63. The Council would like to be actively involved and participate in the development of regional and local strategic plans noting that regional CAPs may be a mechanism to address local issues as noted at paragraph 61 of this submission.⁵³

Research and Knowledge Sharing

64. The discussion at the 'General Commentary' section of this submission is relevant to the discussion in this section of Principle Two.
65. Consideration should be given to including a point regarding increasing the capacity of land use planners to make informed and timely land use decisions when considering land along the Victorian coastline.

Emergency Management

66. The commentary at the emergency management section of the draft VCS is supported. It is generally aligned with the white paper and Emergency Management arrangements.

Principles Three and Four: Use and Enjoy – Ensure sustainable use of natural resources and ensure development on the coast is located within existing modified and resilient environments where the demand for development is evidence and the impact can be managed.

Siting and design of buildings and infrastructure on the coast

67. As noted at paragraph 55 of this submission, the current design and siting guidelines are arguably outdated and should be reviewed with input from stakeholders including Coastal Councils.⁵⁴ The Council would like to be involved in this review. The criteria listed for the use and development on coastal crown land can be included in this revised document.⁵⁵ It is noted that the actions for this section identify the need to review these guidelines.
68. Infrastructure such as mobile towers, pipelines and sewerage outlets are located on coastal crown land. Although they provide a net benefit to the community and are important to maintain, the draft VCS makes no mention of this.⁵⁶
69. The draft VCS states that the desired outcomes and policy for decision making is that *'the built environment on coastal Crown land is confined to structures providing significant community benefit and to those whose functionality depends on being near the water.'*
70. The criteria for assessing the use and development of coastal Crown land is of interest to Hobsons Bay as it has historic and long established urbanised environment which means the social and cultural values will be more pronounced (than environmental values) and may support a wider range of potential use and development. It is worth noting that the Council has a number of sports fields, non-water based sports buildings and community facilities on coastal Crown land. It is in the Council's interest to actively participate in (and influence if possible) the revision of the Siting and Design Guidelines for Structures on the Victorian Coast.

⁵² VCC, draft VCS, 2013, page 48.

⁵³ VCC, draft VCS, 2013, page 48.

⁵⁴ VCC, *Siting and Design Guidelines for Structures on the Victorian Coast* (May 1998) VCC Guidance Material, <http://www.vcc.vic.gov.au/page/resources/guidance-materials>.

⁵⁵ VCC, draft VCS, 2013, page 53.

⁵⁶ VCC, draft VCS, 2013, page 54.

71. The Council will continue to advocate that crown land leases be continued to support/allow current uses not associated with coastal recreation continue. This is particularly relevant for the Hobsons Bay Community Workshops (formerly Men's Shed), the Williamstown Cricket Ground, Fearon and Hatt Sports Reserves in Williamstown which are all situated on Crown Land near the coast. Clarity is also sought on those community facilities that are situated on coastal Crown land which provides significant community benefit but does not necessarily need to be near the water.⁵⁷

Visitation and Tourism

72. The recent changes to the rural zones do provide an opportunity to further increase visitation and tourism along the Victorian coast however this should not be at the expense of the natural assets of the coast. Careful planning of settlements will need to take place to ensure that the increase in population in peak times can be managed but do not cause detriment during the low period.⁵⁸

73. As the draft VCS identifies, Councils and regional bodies will need to undertake strategic planning to identify opportunities and preferred locations for visitor and tourist facilities and infrastructure however it should be noted that funding is required to do this. The need to identify funding sources with the aid of LGs in the process, as identified by the draft VCS is encouraged.⁵⁹

74. It is noted that in March 2013, the Minister released the 'Melbourne Ferries Background Study Discussion Paper' (Ferries Paper) for comment. The Ferries Paper considered the growing population along the coastlines, commuter needs and discussed the conditions required to establish a viable water commuter system. The Ferries Paper also identified Altona and Williamstown as two possible locations to drop off and pick up passengers in the municipality.⁶⁰

75. The Council submission to the Ferries Paper highlighted that more information in relation to capacity, infrastructure demands/ needs and economic analysis is required before a detailed response can be made. However the benefits from a local liveability and visitor perspective for both Altona and Williamstown are recognised.

76. If proposals for ferry services proceed, the flow on impacts such as the impact of commuter car parking on residential amenity require further consideration. The ability of these areas to cater for any increased car parking demand is limited.

77. Other matters that require consideration are:

- The impacts a ferry service will have on recreation boating.
- The timetable, cost and speed at which a ferry can get from point A to point B need to make this a viable option for commuters if it is to have more than a recreation purpose.

⁵⁷ VCC, draft VCS, 2013, page 53; 55; 83.

⁵⁸ VCC, draft VCS, 2013, page 56; DPCD, *Rural Living Zone* (15 October 2013)

<http://www.dpcd.vic.gov.au/planning/theplanningsystem/improving-the-system/new-zones-for-victoria/new-and-improved-rural-zones/rural-living-zone>; DPCD, *Rural Conservation Zone* (15 October 2013)

<http://www.dpcd.vic.gov.au/planning/theplanningsystem/improving-the-system/new-zones-for-victoria/new-and-improved-rural-zones/rural-conservation-zone>; DPCD, *Rural Activity Zone* (15 October 2013)

<http://www.dpcd.vic.gov.au/planning/theplanningsystem/improving-the-system/new-zones-for-victoria/new-and-improved-rural-zones/rural-activity-zone>.

⁵⁹ VCC, draft VCS, 2013, page 56-57.

⁶⁰ DPCD, *Melbourne Ferries Background Study Discussion Paper* (2013) Melbourne Ferries Background Study, <http://www.dpcd.vic.gov.au/planning/projects-and-programs/melbourne-ferries-background-study>.

- Who will be responsible for the maintenance of any assets associated with the service given that there appears to be a general shift of cost to Councils. As discussed in this document, the Council does not have the resources to undertake such a task.
- The Altona foreshore is along a shallow section of the Bay. The existing boat ramp is dredged annually. Larger vessels such as ferries will require more dredging which will add to the cost of maintaining the service.
- One of the key issues in the Williamstown area is the impact on the existing fairways, vessel management and the safety within the area as there are many moorings. Parks Victoria has prepared the 'Williamstown Vessel Traffic Management Plan' in 2008. This report highlighted a number of issues associated with this area, reviewed the relocation of the HMAS Castlemaine and issues associated with the expansion of vessel traffic within the area. The Ferries Paper reiterates a number of existing issues with ferries at Gem Pier that would need to be overcome prior to introducing regular passenger ferry services.

Access on the coast

78. There is no specific mention of the access needs of people with limited mobility and disabilities or Culturally and Linguistically Diverse communities.⁶¹

79. While the VCS outlines that some areas of the coast will be easily accessible, there are no details as to how or what this will include. Consideration can be given to the vision addressing accessibility, preferably via universal design principles, in relation to places, facilities and infrastructure.

80. If universal design principles are not pursued, key points of access should be identified along the coastline and way finding signage used to promote these access points.⁶² This should be done with the aid of local government authorities as per action one in this section.⁶³ The draft VCS suggests the latter but provides little detail as to how this will be done and what it will involve. It is anticipated that the implementation of the draft VCS will help determine this.

Boating and water based activities

81. The Council's would also propose a desired outcome to 'Minimise the impacts of boating use and facilities on local residents and on local streets'. This could include a strategic decision to not increase the footprint of either of Hobsons Bay's boat ramp facilities and the number of ramps.⁶⁴

82. There is no mention of 'new recreational uses' of coastal locations and the water which may have similar impacts, such as:

- jet skis;
- kite surfing;
- sea kayaks and canoes that require access (ramps, matting across land to the water etc.);
- parking;
- appropriate balance of water space; and
- support infrastructure (toilets, more beach/hard area stand for rigging and de-rigging).

⁶¹ VCC, draft VCS, 2013, page 58-59.

⁶² VCC, draft VCS, 2013, page 58.

⁶³ VCC, draft VCS, 2013, page 59.

⁶⁴ VCC, draft VCS, 2013, page 59.

83. New recreational uses of the foreshore and the water are in a 'participation growth phase' and deserve due consideration and proper management. As highlighted throughout this submission, the current inconsistent management arrangements of foreshore land, results in inconsistent developments, maintenance and activities.

84. Map 4 at page 89 of the draft VCS shows the Recreational Boating Facilities Hierarchy 2030 for Inner Melbourne. Although the recreational boating hierarchy will be confirmed in the Integrated Coastal Action Plans for each coastal board region, it should be noted that the heavily used Warmies Boat Ramp, Newport is not labelled on the map.⁶⁵

Sustainable Ports

85. It is anticipated that the various ports in the State have been/ will be consulted regarding the commentary in this section and that it dovetails with the various port plans such as plans for the Port of Melbourne.⁶⁶

Fishing and Aquaculture and Coastal Energy Resources.

86. The commentary in these sections is supported.

⁶⁵ VCC, draft VCS, 2013, page 89.

⁶⁶ VCC, draft VCS, 2013, page 60-61.

Implementation

87. Generally, the implementation proposed by the draft VCS is supported. However the following commentary requires appropriate consideration.⁶⁷
88. Priority action six in table seven of the draft VCS, being 'undertake a review of the coastal management system to assess whether current governance and financing arrangements are optimal to address the impacts of a changing climate with population growth' has the VCC, DEPI and the Department of Treasury and Finance as implementing this action. It is anticipated that LG will have a role to play in assessing the effectiveness of such a system also.⁶⁸
89. However clarity is sought as to how the above cited action will link into the implementation section of Plan Melbourne which suggests a review of State Government assets.
90. The draft VCS also nominates LG as a partner agent in a number of actions, mostly actions under the Plan and Act category. DEPI has a key role to play however their capacity to implement actions allocated to them under current resource constraints is questionable.⁶⁹
91. Local Government is nominated as a partner agent in a number of actions and a lead agent in some (such as cultural heritage and visitation and tourism).⁷⁰ However this does not acknowledge the additional or ongoing impost on local government resourcing. Not all local government authorities have the expertise or resources available to address the areas or issues that local government is now responsible for, however other authorities (DEPI and PV) have the jurisdiction to determine what is required. Mostly the actions are under the Plan and Act category. DEPI has a key role to play and it is legitimate to question the current capacity of DEPI to implement a lot of the actions under DEPI's current resource constraints.
92. The Victorian coastal boards need to have sufficient funding and capacity to implement the finalised VCS and prepare the regional plans the draft VCS discusses. Further, it is critical that sufficient funding and capacity is provided for relevant organisations that will implement the coastal strategy. Any business model developed or research undertaken into finance models to deliver the finalised VCS will need to include LGAs (i.e. Councils) given that it is these authorities that deliver on ground services, infrastructure and facilities.⁷¹
93. It is unclear how the revised draft VCS will be used and applied by the Council. A component of the draft VCS refers to implementation which relies on further planning to be undertaken to provide direction, strategies and actions. The obvious gap in the implementation plan is a sustainable business plan to support the strategy which outlines where much of the resources will come from and which authority will lead.

⁶⁷ VCC, draft VCS, 2013, page 65-69.

⁶⁸ VCC, draft VCS, 2013, page 67.

⁶⁹ VCC, draft VCS, 2013, page 89.

⁷⁰ VCC, draft VCS, 2013, page 31; 55.

⁷¹ VCC, draft VCS, 2013, page 65-69.

Conclusion

94. Generally, there is in principle support for the draft VCS subject to the commentary in this submission. The draft strategy builds on the previous 2008 version with a number of improvements.
95. However, the strategy still fails to resolve some of the ongoing issues surrounding proper coastal management and resources. Funding sources are rapidly diminishing at a State Government level; creating more challenges for LGAs when they are required to take on State Government responsibilities. There is generally a push to reallocate responsibilities for coastal management from the State Government to local government.
96. Land use planning relating to a changing climate, population growth and dealing with strategic directions are also major issues for Hobsons Bay.
97. Hobsons Bay will continue to advocate for better coastal management strategies and support to ensure Hobsons Bay has a viable, attractive and functional coast.