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Dear VEAC,

The Victorian National Parks Association welcomes the opportunity to input into the *Assessment of Victoria's Coastal Reserves Draft Report*, a step towards achieving better planning and decision-making for Victoria's coasts. The draft assessment report is a comprehensive report filled with valuable information and we commend VEAC on your work in putting this together.

We would like to address the following questions you are seeking feedback on:

1. Definition of coastal reserves

Firstly we want to make a comment on the scope of what a coastal reserve is. We find the definition of coastal reserves to be quite narrow and confusing on what constitutes a coastal reserve and what does not. For example to exclude coastal areas under the National Parks Act or areas under the Crown Land (Reserves) Act, results in almost 30 per cent of the coastline as coastal reserve, but leaves a large gap in the coastal crown land not considered under this assessment. This makes management difficult and we would argue that all coastal crown land should be looked at, including under the National Parks Act.

Additionally, it is unclear from the definition whether 'areas subject to government-accepted LCC/ECC/VEAC coastal reserve recommendations', includes recommendations that have not yet been in acted by government (if any) but have been formally accepted. We suggest that the definition include previously accepted recommendations, even if not formally in acted. An example of this is for the Nooramunga Coastal Park where there are VEAC recommendations accepted by government to include areas under the National Parks Act not currently, but this has not yet occurred. (See below point 4 for further detail).

2. Should all coastal reserves be reserved for specific purposes?

Yes, it is important to know what areas are reserved for what purposes to make it clear when it comes to making planning and management decisions within coastal reserves. This will add clarity around what uses, works or infrastructure is acceptable and those that are not.

These reservations however should be clear and binding as in the case for the Belfast Coastal Reserve, there are examples of the reservation being ignored, where commercial racehorse training not an allowable use under the designation, has been overturned.

A further example of conflict in reservation purpose is in the Discovery Bay Coastal Park where commercial pipi harvesting occurs, where there are clashes between fisheries and park management with the use of vehicles on beaches.

3. Are there other important trends or emerging uses of coastal reserves?

The assessment does not mention commercial activities such as fishing which may require access through coastal reserves. This should be considered if any trends or emerging uses are evident across coastal reserves in relation to this use.

Furthermore, we thank you for recognising the VNPA's Reef Watch program on weedy seadragons, and also wanted to bring your attention to the largest Victorian marine citizen science event, the Great Victorian Fish Count, and the Sea Slug Census which is more likely to take place in coastal areas, within or adjacent to coastal reserves.

We would also like to make the following additional comments:

4. Page 25: *'Shallow Inlet, Corner Inlet and Nooramunga marine and coastal parks areas – although not all formally reserved – are considered as equivalent to conservation parks under the National Parks Act'*

There are parts of the above coastal parks which can be argued to not be considered as equivalent under the National Parks Act, as although they are subject to previous VEAC investigation recommendations to be added under the National parks Act, and have been accepted by government, the recommendations are yet to be in acted in legislation.

Previous recommendations From VEAC's Marine Investigation Final Report, 2014 page 17:

R22	The boundaries of the Nooramunga Marine and Coastal Park be formally defined to include the marine areas to the mean high water mark, the pre-existing Nooramunga State Faunal Reserve, and historic sites at Old Settlement Beach and Tarraville.
R23	The boundaries of the Corner Inlet Marine and Coastal Park be formally defined to include the marine areas to the mean high water mark (except where adjacent to Wilsons Promontory National Park), all islands in the inlet (except those in the Wilsons Promontory National Park), and coastal Crown land north and south of Yanakie Landing but excluding Yanakie caravan park and boat ramp (see note). Note: A timeframe for removal of boat sheds at Red Bluff in accordance with previous government decisions should be developed.
R24	The boundaries of the Shallow Inlet Marine and Coastal Park be formally defined to include the marine areas to the mean high water mark, the sand spit, the beach and foreshore on the western side of the inlet and that part of the foreshore on the eastern side of the inlet south of and including the Shallow Inlet camping reserve area and boat ramp until it adjoins Wilsons Promontory National Park.
R25	The remaining adjacent coastal Crown land not referred to in R22 to R24 and initially intended for inclusion in the marine and coastal parks be managed in a complementary way and, as resources permit, be assessed and boundaries defined for possible incorporation of areas to the relevant marine and coastal park in the future.

To our knowledge, parts of the Nooramunga Coastal Park are still managed under the State Faunal Reserve due to a clause in the temporary reservation. Due to the above recommendations not being in acted formally under the National Parks Act, it can be argued they are not equivalent to National Park protection.

Some of the history of these areas including the Nooramunga Islands may be worth looking at individually and may have some implications on the current coastal reserves definition.

5. List of coastal reserves

It would be helpful to see a full list of all the coastal reserves included under this assessment in a table in the appendix, in addition to the inventory.

6. Scope of the Coastal Reserves Assessment

Given the scope of the assessment only includes coastal reserves which make up close to 30 per cent of public land along the coast, there is a large percentage of coastal crown land not assessed. This assessment or further ones should include all areas of coastal crown land, including those under the Crown Land (Reserves) Act or National Parks Act.

Thank you again for the opportunity to comment. Please contact me for further information.

Shannon Hurley
Nature Conservation Campaigner
Victorian National Parks Association
