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#### Assessment of Victoria's Coastal Reserves Draft Report

The Queenscliffe Community Association (QCA) welcomes the opportunity to make comment on the VEAC Draft Report into the Assessment of Victoria's Coastal Reserves. We believe it makes a valuable companion to the earlier report Assessment of the Values of Victoria's Marine Environment.

The QCA believes the Coastal Reserves play a critical role in sustaining and helping to protect the Marine Environment. Any actions on Coastal Reserves should not diminish the Values of Victoria's Marine Environment.

We strongly hold the view of the importance of open public space and the inherent value of retaining these coastal reserves. A detrimental trend we have witnessed are the financial pressures imposed on coastal reserves and crown lands or a perceived need to provide economic returns. This undervalues the importance of these reserves as critical open space.

It is notable a very high proportion of land in the Borough of Queenscliffe is set aside in foreshore reserves including nearby islands. This is thought to be the highest proportion of land in foreshore reserves in any municipality in Victoria. When combined, such lands may be in the order of 60% or more. The QCA's opinion is that coastal reserves around the Borough provide a vital buffer zone between coastline and marine environment. Given dynamic ocean conditions at the entrance to Port Phillip Bay, many coastal reserves around Queenscliff will be amongst the first to be affected by rising sea levels. In the context of the evident climate emergency, potential low-lying land inundation and coastal erosion, the coast will require careful management and very limited, if any, development.

To ensure appropriate long-term management of the coastline, the QCA believes the Borough urgently needs an updated Marine and Coastal Management Plan under the new Act to ensure developments occur in a strategic framework. It is noted the Council has been able to avoid updating its Coastal Management Plan since 2006 without attracting criticism from DELWP. This begs the point of why have statutory requirements if they are not enforced?

We suggest some of VEAC information around Queenscliff and Point Lonsdale needs updating and correcting e.g. the recent Declaration of Distinctive Areas and Landscapes (DAL) on the Bellarine, recent Point Lonsdale Maritime and Military Precinct changes and Heritage Victoria listings for Queenscliff and Point Lonsdale lighthouse reserves need to be updated.

The QCA also suggests listing individual reserves in the VEAC map for Queenscliffe such as Victoria Park (Queenscliff's Botanic Park) and Golightly Park in Point Lonsdale rather than lumping them together as "Tourist Parks". Notice Royal Park coastal reserve at Point Lonsdale is listed correctly.

## **DEVELOPMENT PRESSURE IN COASTAL RESERVES**

The QCA remains concerned about the Public/Private partnerships instituted on sensitive coastlines and the resultant impacts, including potential loss of public access and compromising of historic viewsapes or heritage infrastructure. The Queenscliff Harbour development remains a key concern about enforcement of maintenance and repairs to public assets under lease.

The QCA remains concerned about defacto exploitation of coastal reserves (or foreshores) for what are deemed positive 'tourism' outcomes. Too often catering for tourism has overridden environmental or social values. Such proposals require careful assessment which take into account non-financial social value of coastal areas, not just a simplistic return-on-investment evaluation.

By way of example, the major impact of the ferry on traffic flows and coastal development requires scrutiny and reassessment. Major works are planned in both Sorrento and Queenscliff. The local community will be significantly affected by the proposed increase in traffic flows but to date there has been little meaningful community engagement and scant regard to quality of life impact for residents and ratepayers. This should have been an essential aspect of the ferry upgrade proposal.

Another project being considered to improve the tourist experience and strengthen coastal destinations during the off-peak period is a car ferry between Stony Point and Cowes. When combined with the existing Queenscliff to Sorrento ferry service it is proclaimed would create a tourist driving route linking the Great Ocean Road, Bellarine Peninsula, Mornington Peninsula, Phillip Island and the Bass Coast. At what point has sustainability and possible negative impacts on the environment of such projects been evaluated?

Over the past decade it has concerned the QCA about the priorities various management authorities have taken with regard to the Borough's coastal reserves. These have amounted to the possible ways to leverage 'paying' tourism development and impose additional structures that superficially appear to reap financial returns. These included tourism housing on Shortland's Bluff and a Stingray Feeding auditorium in leased lands under the control of Parks Victoria. We have witnessed substantial sporting developments on Council-managed land, which still continues with the proposed positioning of outdoor gym equipment on prime coastal land, cluttering the environment, negatively impacting on sensitive coastal dunes, and dividing the community.

The QCA's position is that whichever government department or agency manages the various coastal reserves in the Borough (and we have a number of different authorities) that minimal, or no development, should be the guiding principal underpinning the curating and custodianship of these important parcels of land.

These areas vary widely in their values, uses and management standards. Some areas are leased to user groups, including, for example, the Pt Lonsdale Bowling Club, QBTCC, QCSSC and Camp Wyuna. At one point we believe there was a COM over the Sports grounds. We are unsure of the governance over these areas and the role of the assigned Foreshore Manager. No or few reports ever come before Council on the Caravan Parks or other parcels of land from Council officers.

We note concern over clearing indigenous vegetation around the railway track areas. There needs to be regimented guidelines and arborist advices or supervision of such works.

## **ZONING OF COASTAL RESERVES & HERITAGE RECOGNITION**

There appears inconsistency surrounding High Water Mark and Low Water Mark to delineate coastal boundaries and areas of coastal responsibility. With climate change this delineation needs reassessing. Queenscliffe Council often cites HWM as the limit of its responsibility, beyond that its DELWP. We believe maintenance of the seawalls for example many of which are 60 -70 years old - most ageing infrastructure on our coastline is the responsibility of the State. There needs to be a regular maintenance program instituted and more funding for the protection of our coastal reserves. The QCA would strongly suggest a future asset and infrastructure liability survey associated with climate change.

The waters of Swan Bay are part of the Port Phillip Heads Marine National Park and the area is an important RAMSAR site - would be sensible to have "Lakers Cutting" included in the Swan Bay Marine Reserve given the development of 6 kilometres of channels/waterways in the Moremac residential development.

According to past reports the 11 sections of coast identified in the 1997 Draft Land Use Plan were used as preliminary management units in the study. These were subsequently reduced to three main precincts - Pt Lonsdale, The Narrows and Queenscliff. Smaller management units were also used in developing site-specific actions.

We also note zoning issues are often the introduction to development of these coastal reserves. The coastal reserves and/or crown land having Special Use Zones applied to them which allows virtually anything – cafes, gaming machines, extending liquor trading, retailing etc. In our view it would be good if all our coastal reserves and crown lands had more or stronger PCRZ (conservation) zonings.

We wish to nominate the importance of the last "wild" coastal reserve 'Buckley Park' which is virtually untouched on the Bellarine (also important bird sanctuary and plant life) including Lake Victoria (Lonsdale Lakes Wildlife Reserve) between Point Lonsdale and Collendina which is now under development pressure for new tracks and public access. We recommend this be given a much higher coastal reserve status.

VEAC appear to underplay the importance of the unique shipwreck history present around the Rip. Here is a potential tourism opportunity. The QCA believes also attaining a National Heritage listing for the three headlands of Pt Lonsdale, Queenscliff and Pt Nepean should be promoted by VEAC. UNESCO World Heritage should also be investigated for the heritage and environmental values of Port Phillip Heads.

## **CLIMATE CHANGE IMPACT**

Projected tidal inundation for Swan Bay Conservation Reserve associated with climate change is alarming - Queenscliff/Point Lonsdale Coastal Reserve has some 18 kilometres of coastline in total and some 246 hectares of coastal reserves (this includes some 135 hectares mainly off shore comprising the Queenscliff harbour precinct). Interestingly there is a "Queenscliff Bushland Reserve" listed in the Narrows. The QCA asks what is the legislated protection of this listing.?

We note no Queenscliff/Point Lonsdale reserves (indeed most of Port Phillip bayside reserves) have "protection of coastline" as their prime purpose. With forecast climate change impact this should be reviewed.

We note significant impact of climate change will be exacerbated by through previous major dredging of the Rip and connected channels. This has had significant impact and resulted in erosion of coastline. This impact is on-going and will continue to have a significant impact on the marine and coastal reserves.

Future asset and infrastructure liability survey associated with climate change might be something we should be considering - we are aware that Queenscliff Council only has responsibility for small portions of the masonry sea walls many of which are 60 -70 years old - most ageing infrastructure on our coastline is the responsibility of the State.

We believe there is a need to keep National Parks under National Park control - the recent creation of Great Ocean Road Authority seems to circumvents this.

Queenscliffe Coastal land has 2 areas of Crown Land from the High- Water Mark and offshore which are protected in the Port Phillip Heads Marine Park under the National Parks Act 1975. Our onshore areas are mostly coastal reserve. The number of "permanent" coastal reserves (33%) as opposed to "temporary" (64%) or "unreserved" (some 2%) listed reserves is not appropriate given continuous development pressure. This is especially the case in Queenscliff/Point Lonsdale where "temporary" coastal reservations seem widespread. The QCA recommends greater emphasis on "permanent" reserves.

### **THE ROLE OF THE COMMUNITY IN MANAGING RESERVES**

There is a role for a much greater community voice and participation in such management. The past decade has seen the closing down of several community engagement bodies but these should be encouraged in local government areas, such as the Queenscliffe Council, which has neither the resources nor expertise to manage important Victorian coastal areas.

In the 2006 Coastal Action Management Plan /Crocker it stated -

*“The Council has adopted a strong custodial role for the foreshore, and has forged partnerships with adjacent coastal managers, state government agencies and the community to make the coast one of the best managed in Victoria. A community-based Foreshore Advisory Committee helps to ensure adequate funding and sound management of the coast, supporting Council’s full-time foreshore manager.”*

The QCA believe this has not been the case. There has not been a community-based Foreshore Advisory Committee, nor an effective staffing of foreshore management. We question the claimed strong custodial role council has claimed particularly with regard to maintenance and protection of the foreshore. There is substantial documentation available within DELWP and other Victorian and Commonwealth agencies to demonstrate the inability of the Queenscliffe Council to effectively manage its foreshore.

The QCA believe there is a need to constitute strongly community input in S.86 LGA committee structures to advise council and manage such important parcels of land. We consider the Council does not have the resources nor technical knowledge to manage a dynamic foreshore which has high levels of public use, plus extensive heritage structure of national importance. This situation is exacerbated by the fact the Borough of Queenscliffe the smallest Victorian council with representation changing every 4 years making long term decision-making problematic. The community with its collective memory and skill base should be utilised better.

In short, the Queenscliffe community has experienced problems with management of local coastal reserves and lighthouse reserves when transferred to the Borough of Queenscliff (under a Committee of Management structure). The Council proposed commercial development of both Point Lonsdale and Queenscliff Lighthouse Reserves, effectively privatising them and taking them out of the public realm. Such proposals must be evaluated in light of housing activity on the Bellarine Peninsula. The continued loss of farm land to housing, ongoing residential subdivisions makes the need for the preservation of, and access to, open spaces more critical. Importantly, there is a need for greater continuity and structured governance to manage the environment pressure of continued population growth.

Much community work has gone into protecting our coastal reserves. This should be a function of DELWP which should be playing a greater role in not allowing such projects to ferment. The Coastal Management Consent process is vague and seems to occur on a government-to-government level without advising the community. This is too vague an approach and only effective if provision is made, and enforced, for the 'public voice' to be heard. In our view too many projects escape proper scrutiny and investigation.

### **COASTAL RESERVE MANAGEMENT GENERALLY**

Coastal management of our coastal reserves is split between the Borough of Queenscliffe, Parks Victoria and DELWP and the Commonwealth which seems somewhat cumbersome and disjointed. This is probably the case across the rest of coastal Victoria – a review of the number of management authorities would be welcome.

The QCA notes Council states *“Council manages most of the coast but Parks Victoria, Vic Track, the Commonwealth Government and Lighthouse Reserve committees also have responsibility for specific areas”*. We would argue this is incorrect as no formal Committees have been in place for a long period of time.

Unfortunately, due to the frequently obscure management of coastal reserves, the community seldom is briefed on long-term plans or is given an opportunity to be part of the ground-up decision-making process. Consultation generally occurs after proposals have been agreed, funded and designs commenced. The community needs input into the complete decision-making cycle. In our view, without such an open process there can be buck passing and responsibility deflection and marginalization of the community. By way of example, virtually the entire Queenscliff harbour that was once Parks Victoria responsibility has been privatised for some 60 years with a corresponding 10-fold increase in wet berth fees, effectively excluding many lower socio-economically advantaged boat owners from accessing harbour facilities.

The QCA notes the large areas of Commonwealth controlled foreshore land (Swan Island and the Fort) in Queenscliff and ask how compatible that is with State owned coastal reserves and crown land or whether VEAC has any suggestions for this delineation? The boundary of Queenscliffe includes Commonwealth controlled foreshore land (Swan Island and the Fort) in our view it is important to ensure it is compatible with State owned coastal reserves and crown land. The same can be said for National Park regulations/uses and their compatibility with adjoining state-owned coastal reserves.

Parks Victoria appears to be underfunded to undertake needed maintenance programs. Given there is an office in Queenscliff there is an expectation that heritage conservation and preservation occurs. Parks Victoria appear to have management control of some of our coastal reserves and the Piers and Jetties in our tiny municipality. However, over the past 5-10 years, it is often the community assessing or instigating important reinstatement works or need for repair.

Perhaps as a result of reserve management ambiguity Coastal Siting regulations are often not adhered to. We ask these to be strengthened or adhered to and policed. A review of the VCS (VCC 2004) identified a number of issues currently requiring additional attention. These include:

- The increasing gap between funding requirements for maintenance/repairs of infrastructure, e.g. piers, seawalls and steps, and funding available
- Active rehabilitation of natural systems is needed.
- Urbanisation pressures, e.g. additional housing in the Greater Geelong City Council area adjacent to Pt Lonsdale.
- Confusion regarding application of the VCS to private development near the coast
- Funding is short-term, often delivered via annual grants.
- Overall revenue and expenditure is unclear.

The QCA believes many of these issues remain unresolved or requiring re-evaluation. The QCA would be happy to comment further on this project and be involved in future input.

It is notable that the Parks Victoria Management Plan identifies that "the long -term protection of the Marine National Parks and Marine Sanctuaries relies on the support and goodwill of the community, together with the help of coastal managers and government agencies. It is the QCA's view that the Council's history of excluding appropriately qualified community members from assisting with the management of high-value coastal land has been highly detrimental. It is relevant that the Victorian Auditor General issued a review audit of local government in February 2014 "*Asset Management and Maintenance by Councils*". The findings of this report echoed the VAG report "*Oversight and Accountability of Committees of Management (CoM)*" of February 2014. The VAG concluded inter alia:

- Councils have not yet fully developed and applied sound strategic asset management frameworks and have not yet met the better practice requirements of most framework elements.
- Councils need to enhance the quality of asset management plans and link service levels and standards to their plans, and use the plans to drive their asset management practices.
- Councils had often not effectively integrated asset management with other corporate functions, such as finance and service planning, which poses a risk to a council's ability to achieve its overall asset management objectives.
- Asset management strategies were generally underdeveloped.
- Few councils achieve the 'core' level of maturity in asset management as assessed using the National Asset Management Assessment Framework especially small and regional councils which find it more difficult than metropolitan ones to improve their asset management performance against the national framework, due to resourcing issues. Delays in councils reaching core maturity in asset management heighten the risks associated with ineffective asset management. These risks include deteriorating and failing assets, the adverse financial implications of growing renewal gaps, and reducing the quality and number of council services available to the community.
- Significant under expenditure of capital works budgets by councils suggests there is scope to better integrate capital works programs with asset management and long-term financial planning to minimise such variations.
- Spending on renewing or replacing existing assets is not keeping pace with their rate of deterioration. Many councils are generally not able to meet existing asset renewal requirements, resulting in cumulative renewal gaps that grow each year. This situation adversely affects the condition of assets, community service levels, and councils' long-term financial sustainability (highlighted around 15 years ago in a report to

government Facing the Renewal Challenge – Victorian Local Government Infrastructure Study). Failure to make those decisions quickly will only lead to even harder decisions in the future, and will result in the continuing deterioration of assets and services.

- Effective asset management is also being compromised by underdeveloped asset management information systems and a lack of skilled resources, particularly in smaller and regional councils.
- Councils continue to rely on poor asset data and information systems and they are still not confident that all their assets have been identified and recorded. This reduces the capacity of councils to effectively monitor, evaluate and report on asset performance or to properly plan for asset rehabilitation.
- There is substantial scope for improving reporting to the community on asset management against performance measures and long-term financial plans by providing more detailed explanations on budget variances in capital works programs. Councils also need to improve the asset information on their websites and provide a greater awareness of asset management challenges faced by councils, their approach to them, and how they are performing.
- There is an abundance of guidance available from Local Government of Victoria (LGV) and other sources to assist councils, but councils are not making best use of this material. LGV provides limited targeted asset management support, noting however LGV guidance on asset management is also out of date. It does not address common challenges such as developing appropriate asset management information systems, developing a set of asset management performance indicators that will enable comparability between councils, and dealing with the growing renewal gap.

Unfortunately, the consequent risk of inadequately resourcing CoMs (and Councils) which manage historic or environmentally sensitive coastal reserves is that important opportunities may be missed or inappropriate decisions made. In the case of the coastal reserves in the Borough of Queenscliffe, from the Council viewpoint, it is hard to see the big picture when budgets must be balanced and resources are constantly under pressure.

Since assuming responsibility for coastal reserves in the Borough, the BoQ's focus has been on the need to control associated capital and recurrent costs but with little opportunity to offset them. The Borough has high visitation rates over the summer and Easter periods but this does not necessarily translate to revenue to the council. Added to the Council's administrative challenges is that a considerable part of Point Lonsdale now falls within the City of Greater Geelong's administrative area.

The image to the right shows in red that part of Point Lonsdale which is now in the Geelong zone. All the rate revenues flow to Geelong while the residents of that area utilize the facilities of the Borough of Queenscliffe (noting Geelong is almost



20 kilometres away).

The key issue is that the BoQ is being tasked with responsibilities which it cannot possibly manage effectively without much greater financial and logistical support (it could also be observed that there is perhaps a reluctance to acknowledge management challenges and seek help or guidance, particularly from the local community).

The inevitable outcome is that the Queenscliffe Council has proposed several commercial development options in coastal reserves. This has disconcerted the local community and wider stakeholders who regard the coastline as public land which should be protected, particularly in light of the adjoining marine national park and fragile dune ecosystem.

The main points being made about the management of coastal reserves are:

- There is a lack of coordination among agencies with responsibility for coastal reserves.
- Significant coastal heritage structures have been deteriorating with no alarm bells being raised which indicates an inadequate central review process i.e. insufficient checks and balances of coastal reserves management and strategy implementation reviews.
- Unfunded committees of management have little prospect of effectively managing aging heritage structures within coastal reserves which may require sophisticated and regular preventative maintenance.
- Lack of sustainable funding can lead to detrimental and long-lasting decisions being made in the quest for revenue. Paradoxically the drive to generate income can undermine the very values needing protection.
- It appears the appointment and ongoing management of CoMs still can be done with little or no community involvement even though DELWP's Committees of Management Responsibilities and Good Practice Guidelines states "The community is a committee of management's main client group. A good relationship with the community is an important part of ensuring that a reserve is used, enjoyed, appreciated and developed by all." Failure to have community involvement in CoMs can lead to decisions being made which go against clearly articulated community values. DELWP should monitor and encourage (require?) community members to be on important CoMs.
- It can be difficult for members of the public to identify responsible agencies for coastal reserves; therefore, it becomes problematic to offer alternatives particularly when there are no community members on a CoM.
- Consideration could be given to establishing within DELWP a method for assessing and progressing innovative solutions for coastal reserve management without referral back to the current managing body which may be unwilling or unable to consider alternatives.
- Innovation is also dependent upon effective two-way communication between the manager of the Crown Land and stakeholders. This issue is no different to many other decisions required in the local community. The 2012 paper '*Evolution in Community Governance: Building on What Works*' by the Australian Centre of Excellence for Local Government concludes that community governance requires new ways of working and new ways of understanding the roles of the different parties involved – elected members, management, and communities and their members. The ACELG notes that community 'consultation' is increasingly being re-defined as 'engagement' with councils going well beyond seeking views on specific decisions to having an ongoing negotiation with their constituents about service delivery and the key issues facing the area, using techniques such as neighbourhood forums and online panels i.e. a paradigm shift to a much more collaborative approach to the way local government works. VEAC needs to consider how to ensure adequate consultation between coastal reserve managers and the community in order to answer the question as to what is the appropriate role for community groups and organisations, local committees and local



government in management and promotion of high value public land, not just coastal reserves?

Yours sincerely

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