



Australian Coastal Society – Victorian Chapter Submission

Governance of the Great Ocean Road Region Issues Paper 2018

1. Introduction

The Australian Coastal Society (ACS) is a national organisation comprising professionals, individuals, businesses and groups with expertise and/or interest in coastal planning and management. The ACS is dedicated to healthy coastal ecosystems, vibrant coastal communities and the sustainable use of natural resources, and the concept of Integrated Coastal Zone Management (ICZM) is central to our objectives.

The Victorian Chapter (ACS Vic) appreciates the opportunity to contribute to this initiative to improve the governance for the Great Ocean Road Region. We commend Government and the Taskforce for recognising the need to address issues arising from both historical arrangements and the current situation. Our members have considerable experience in this area and we hope that our comments are of assistance. We would be happy to discuss any issues raised in this submission further with the Taskforce.

The Paper represents our first point of engagement with the process, and in this submission we seek to answer Taskforce questions where possible. We provide both general and specific comments.

2. General comments

a) Public or private land

The paper is not clear as to whether proposals for change will apply to public or private land management or in how they may apply. We are aware that this has created some uncertainty amongst stakeholders along the Great Ocean Road (GOR). In our view, the challenges and potential solutions require the proposed approaches to apply to both public and private land, and cannot be dealt with effectively in isolation. The public/private land interface also warrants specific attention. The need for changes to apply to public and private land to achieve integrated outcomes should be made clear in the final recommendations.

b) More than tourism

We acknowledge the Terms of Reference, the importance of tourism to the regional economy and the recognition of communities along the GOR in the Paper. However, the Paper is not consistent in its focus, on one hand giving the impression that the fundamental driver for proposed changes is to benefit tourism outcomes, and on the other taking a broader approach reminiscent of the Great Ocean Road Regional Strategy 2004. This is evidenced throughout the Paper, such as the “key complexities” on p43 which appear to logically apply more to further tourism development and less to the needs of communities. It also implies tourism is the only economic activity on the GOR. The economic activity outside of tourism appears to have

been omitted, and yet is significant. We believe tourism is a valued part of the regional economy, but suggest the need for change is far broader than tourism.

It is important to note that the GOR, and indeed the Victorian coast, is managed by the Crown on behalf of all Victorians. It is a place where many people live and, with the likely exception of those who materially benefit from tourism, look forward to actively and passively recreating in a relatively uncrowded setting. People enjoy belonging to these small towns, and often have strong social connections. There are many successful tourism businesses on the GOR, and further development of tourism initiatives and experiences should not compromise the needs and aspirations of existing communities. In this light, we also urge caution in efforts to spread visitation both spatially and temporally. With peak and shoulder seasons extending further each year, and our landscapes and communities need a break from these levels of visitation in order to preserve the values attracting visitors in the first place.

c) Integration across coast and hinterland

We support the recognition of the role of the hinterland and the need to work across assets and locations to deliver better tourism outcomes. Again, we encourage this integration to be broader than tourism.

d) Learning from previous initiatives

The recognition of the Great Ocean Road Regional Strategy 2004 is welcome, however the Paper does not appear to utilise the learnings from the GORRS process. We encourage the Taskforce to explicitly consider and learn from the range of previous approaches relevant to the GOR which have sought to integrate competing demands at regional and sub-regional scales. We believe the learnings from their development, implementation and review can build the capacity of all stakeholders to maximise the success of future approaches and several should be closely examined. These include, but are not limited to, the Central West Regional Coastal Action Plan, the Western Victoria Boating CAP and the Corangamite Regional Catchment Strategy. While some circumstances may have changed, the central issues remain relevant and the key challenges inherent in motivating organisations to achieve these plans and making them accountable have strong resonance today.

e) Further consultation on models

We note the intent of the Taskforce to undertake consultation on the Issues Paper and provide recommendations to Government by late 2018. We support the need for change and the intent of proposed changes to improve integration across responsible parties. However, we believe a further stage of consultation would greatly benefit the process and allow all stakeholders to benefit from the findings of this consultation prior to recommendations being finalised.

In particular, our experience indicates that while many people will have had considerable exposure to, and may agree with, the issues and need for change, there is far less understanding of the importance of governance processes and their role in addressing these issues. As such, we see insufficient analysis and detail in the proposals put forward to improve governance *i.e.* the planning and oversight functions of the new model. In addition, we are concerned that community consultation may have focussed on the issues driving the need for change rather than the proposed governance changes themselves. We believe consideration should be given to a further stage of capacity building and consultation once an analysis of the positive and negative implications for different approaches has been undertaken.

3. Specific comments

Section 2 – The Great Ocean Road

Questions 1 and 2

The attractions and need for protection of such attractions along the GOR are well-known, and have been captured in a wide range of documents such as the Victorian Coastal Strategy. We support the inclusion of the issues in the Paper. We understand the attraction of the region for both residents and visitors to be

underpinned overwhelmingly by the environmental and social values and amenity provided by its landscape, towns and communities. The environmental assets in particular are emblematic of Australia's broader appeal as "clean and green" with open space, and require rigorous protection. The laid-back atmosphere of the towns is also a key attraction and should be maintained.

Question 3 – Aspects to change

The following points require greater consideration by policy makers and planners:

- the concept of user pays for natural and social assets should be openly explored to challenge funding paradigms and the very notion of asset value. The GOR hosts a range of important assets and experiences with non-market economic values yet to be properly understood. The VCS supports work of this nature.
- Different forms of visitation have an impact on others. The Paper does not appear to qualify support for visitation, and this should be clarified. For example, the camping experience at Kennett River is compromised through bus-loads of international bus tourists walking through the park to see koalas.
- Tourism is known to create conflict within local communities, with benefits often flowing to those in business. Many people live on the coast for the lifestyle rather than business opportunities, and tourism development and its resultant increases in visitation can often be perceived as being at odds with this. It is important to recognise this in order to create welcoming communities who in turn create conditions conducive to visitors returning.
- As mentioned earlier, down-time is important. Both low- and shoulder-season provide opportunities for communities and natural assets to recover from peak visitation and busy periods.
- Greater recognition of both active and passive experiences. The GOR region is likely to benefit from complimentary activities and a mix of experiences.
- There appears to be much support across the region for large events as economic drivers. However, we believe there should be greater recognition of the role of events on peak visitation and their impact on natural and built infrastructure and communities.
- Residents play a significant part in GOR visitation. We support this recognition in the Paper, but believe there should be more context for values and demands placed on the coast by resident communities.

Section 3 - Case for change

This section puts forward a range of very important and legitimate issues supporting the case for change.

Question 5 – Other critical issues

We believe the process would benefit from greater recognition of:

- Conflict between the objectives and actions of different plans across government which impact on the GOR e.g. tourism plans and environmental plans.
- Changing demands and expectations of residents and visitors, that is, qualitative aspects rather than the current focus on numbers. Work is needed to understand this, and yet the demands and expectations should not override sensible policy and planning for sustainable outcomes.
- The impact of Torquay. It is not on the Bellarine Peninsula, but rather is the start of the GOR. It has a high proportion of people with an active interest in coastal recreation, and many locals travel down the coast/GOR to escape the crowding in Torquay on weekends and holidays from both the growth of the town plus visitors from Geelong, Armstrong Creek and Melbourne;
- Challenges for the capacity of land managers and local governments to deal with the myriad coastal issues. There needs to be far greater capacity building and resource sharing. It is important to note that this is not limited to the complex issues as per point 4 (p33).

Section 4: A new management model

We support the need for a new management model, though issues of scope and scale need to be clarified.

Question 6 – Policy, Goals, Principles

We agree that further work is required as outlined on p40. However, we see benefit in clearly articulating the process sequentially and suggest that the establishment of a lead agent and securing funding for its recurrent operation should precede the development of the plan. It is also important that funding commitment be

secured, at least in part, for Plan implementation earlier in the proposed process. In our collective experience, one of the primary reasons for the underachievement of previous similar plans has been funding uncertainty.

The green box on p40 appears to be a policy statement, but this is not clear. We believe a policy to support the proposed changes requires considerably more detail to provide the clarity and certainty to achieve integrated outcomes.

We support the principles for improving governance of the GOR region on p41. However, the Paper provides no further information about how they were developed or how they may be used, and we find it difficult to provide targeted comment without this necessary context. Assuming they are likely to be used how other management principles have been used prior, we suggest:

- That the issue of sustainable development should extend well beyond the tourism economy. This is a foundation of integrated coastal zone management and should be applied to all issues subject to the proposed governance changes.
- The inclusion of a principle/s addressing the social values and needs of communities.
- The extension of modern governance principles to include:
 - education and capacity building for all stakeholders, including existing agencies and communities, to strengthen understanding of issues and perspectives amongst and between stakeholders.
 - the concepts of coordination and collaboration, as we expect this will be essential to the functioning of the new agency.

Question 7 - Strategic Framework Plan

We support the concept of a Plan, and note that a number of initiatives have attempted to achieve similar objectives over the years. We believe consideration of the Paper's proposals would benefit from discussion and analysis of these initiatives. We also encourage consideration of the following:

- The Victorian Coastal Strategy provides an excellent reference for integrated management of the region. Its principles and concepts should be reflected explicitly in any regional plan seeking to deliver integration across coastal protection, use and community. We encourage a more explicit recognition of the primacy of the VCS and its reflection in the Plan.
- The process articulates delivery of a sustainable approach, yet the Plan appears unnecessarily constrained. We suggest broadening it to deliver on the three tiers of sustainability. For example, town structure should include the social and economic dimensions of communities, landscape characteristics should include values, and economic development should include the need to understand economic value. The proposed content of the Plan appears inadequate to deal with the Paper itself identifies as needing to be addressed.
- Go beyond the individual settlements and look at the interaction between them and their respective roles in the hierarchy. It is not clear whether their current roles are consistent with community expectations or regional needs. For example, there is significant community concern that Torquay's status as a growth node should be wound back in the context of Geelong's growth and Armstrong Creek.
- An accompanying regional infrastructure plan is likely to provide important direction and coordination of necessary facilities and other infrastructure. However, in keeping with the broader needs identified in the Paper, it should be combined with a similar plan to manage and invest in the natural and social capital/infrastructure of the region which is its lifeblood.
- The plan needs to be binding on land and infrastructure managers, and on planners. That is, it needs to be delivered through the corporate planning mechanisms of these parties, and be reflected in their strategic planning, including the planning scheme administered by local government. So too should it be respected by the State Government and Planning Minister in the case of calling in planning matters. It should have a suitable review and revision timeframe, complete with an audit function to enable assessment of its true integration and delivery.
- It can be difficult to gain a sound understanding of community values and preferences. We encourage this process to examine work undertaken by the Western Coastal Board in 2010-12 which examined non-market economic value and social equity preferences for climate change adaptation at five locations in Victoria. The Caravan and Camping Parks project surveyed 770 coastal residents and campers - two

groups often considered to be in some conflict - about how they valued the coast and how climate change should be managed. The results were insightful and surprising, and we encourage the development of the Plan to explicitly consider the results and undertake similar work to contribute to the evidence base required for effective decision making.

- The Plan should be clear regarding current and future use of public land. In our view, public land is for all people. Commercial development should not be subsidised by infrastructure development on public land.
- The Plan requires clear pathways for achieving sustainability on the GOR. There have been significant advances in sustainability assessment and delivery, and governance arrangements need to reflect and support this. Necessary changes will require significant investment in coordination, monitoring, reporting and further refinement of planning and management approaches. This applies at many scales from smaller issues such as waste and recycling through to complex concepts such as the carrying capacity of public land reserves.

Question 8 – New Organisation

In our experience, all four models proposed have positive and negative points. They require political will, funding, capacity and autonomy. We believe that once the scope of the regional need is clarified through this process, there should be further analysis of the pros and cons of the four options and further consultation on Questions 8, 9, 10 and 11. Greater detail and discussion is required on these important matters.

At this stage, our collective experience results in a lack of confidence that anything but a new body will have the culture or capacity to effect the change inherent in the Paper. We are concerned that:

- Coordinating committees are often challenged and rarely have they achieved their intended aims due to a lack of funding, an inability of representatives to make decisions and a lack of real power.
- Existing agencies have inherent conflicts of interest in taking a coordinating role and have demonstrated they do not have the overarching awareness or culture to address the issues identified in the Paper.
- An agency within an agency will always be subject to the whims of that host agency.

In this light, we support the creation of a stand-alone agency. It is logical that it be established through its own legislation, with its own powers, responsibilities, funding and staff. It could be overseen by a Minister whose agency core function is not specifically subject to the Plan, such as Premier and Cabinet, which would minimise conflicts of interest. However, it should be accountable to Parliament.

This legislation could have its own objectives and principles, and:

- establishes the lead agency and its functions
- establishes the planning approach and relationship with other planning mechanisms
- ensures all relevant land management and planning agencies have input to, due regard for and take steps to implement the planning of the agency
- details accountability and enforcement avenues.

On the subject of funding (p45), it seems necessary that there be separate recurrent funding to support the operation of the new organisation. It will need capacity and some form of incentive to drive integration. These matters are currently missing from the Paper, and further detail and discussion is warranted.

We trust these comments are constructive and look forward to further discussion on this initiative. Please call me on [REDACTED] or email [REDACTED] if you require clarification or to discuss any matters.

Yours sincerely

[REDACTED]
President, Victorian Chapter
Australian Coastal Society