

Wyndham Boatshed Association Inc. (Reg. No. A0042447N, PO Box 6448, Point Cook Vic 3030)
Comments on the Draft Central Regional Coastal Plan 2015-2020 (DCRCP 2015-20)

Introduction

Boatsheds have occupied those parts of the Crown Coastal Reserve in Werribee South known as Campbells Cove and Baileys Beach since being relocated from an area adjacent to the Point Cook RAAF Base in the 1930's. The boatsheds are used for fishing, recreational boating and as a base for the enjoyment of the delights of the coast by a substantial community of families and friends. An annual fishing competition is also conducted that community. The boatshed community plays a significant role in caring for that environment, attempting to mitigate erosion, clearing rubbish, controlling weeds, etc.

The Wyndham Boat Shed Association (WBA) represents the vast majority of the owners of the 143 boatsheds and welcomes the opportunity to comment on the Draft Central Regional Coastal Plan 2015-2020 (DPRCP2015-2020).

WBA is generally supportive of DPRCP2015-2020, regarding it as a useful contribution to a very important subject. Our comments, informed by the collective experience of our members, are not focused on our specific interests but rather are directed to the overall benefit of the Central Coastal Region (CCR) as a whole, and particularly to the interests of the Western side of Port Phillip Bay.

The priority issues set out in DPRCP2015-2020 are:

- Regional Priority 1 - Population growth balancing access and valuing natural environment
- Regional Priority 2 - Adapting to a changing climate and increased coastal hazards
- Regional Priority 3 - Integrating coastal planning and management
- Regional Priority 4 - Sustainable and equitable funding mechanisms for coastal infrastructure and management
- Regional Priority 5 - Oversee the implementation of the recreational boating facilities framework for the central coastal region
- Regional Priority 6 - Sustainable visitation and tourism infrastructure service level hierarchy

Our submission is structured with comments on each of the Priority Issues identified by the Central Coastal Board (CCB), but also discusses several important issues that in our opinion are not adequately treated in the Draft Plan. One of these is the importance of articulating a clear overarching vision of the direction in which it is desired to head. Some comments apply to several of the Priority Issues and so there is some cross-referencing in the submission.

Melbourne is regarded as one of the most liveable cities in the World. The characteristics that have helped it to gain that reputation include exceptional integration of elements of the built environment with the features of the natural environment.

Notable examples include:

- Some initiated many years ago, such as the Royal Botanical Gardens and the extensive adjacent public garden areas close to the CBD.
- Others have been built up over the years, such as the MCG, which has grown into the centrepiece of an outstanding Sporting Precinct.
- A number of other such precincts dedicated to the Arts, to entertainment, eating, etc.

One of the quite recent successes is Federation Square, which has worked exceptionally well as both an informal gathering place and as a centre for special events. Each of these examples was initiated by exceptional individuals or organisations with a vision.

How does the Central Coastal Board see itself? Is it passive, reactive, creative; a visionary, an initiator, a catalyst, a supporter, a coordinator, a facilitator, a coach, a challenger, an enabler, a resource, a pipeline, a champion or something else?

On page 20 of DPRCP2015-2020, the point is made that “The Central Coastal Region has many bodies responsible for land and water management along and across the coast. Forty different managers manage the coastline and many more the water, waterways and catchments.”

It does seem to us that whilst the CCB may act as a coordinator or facilitator for initiatives that arise naturally within one or other of these 40 bodies or from the public generally, it also needs to have a role as an identifier of concepts and a champion of those that are ambitious and worthwhile and which meet needs or create opportunities that are not yet recognised by others.

Some such concepts may be radical. The Sydney Harbour Bridge was conceived, designed and initiated during a world-wide financial crisis of immense proportions. It provided 7 lanes each way when there were less than 200 cars on the north side of the harbour and it led to changes in the whole direction of development of the City of Sydney.

Some concepts are just a part of long-term planning, but their omission may make good outcomes difficult or very expensive to achieve. A very important example is the need for early Reservation of Land to enable visions to be effectively realised. There have been many examples of this happening over the years, such as:

- the reservation of the land for the great boulevards of Melbourne, like St Kilda Rd, Royal Parade and Dandenong Rd;
- the reservation of the land for the Western Treatment Plant, the largest facility of its type in the world;
- The reservation of the routes for the 220kV and 500kV transmission line rings around Melbourne that have met the needs of the expanding population for more than 50 years and will do so for decades yet;
- The reservation of the routes for the Eastern Freeway, East Link and Peninsula Link, with scope still for extension to at least to Melbourne Rd Blairgowrie, providing scope for access to the Mornington Peninsula for the people of whole eastern part of Melbourne;
- The reservation of the land for the Outer Ring Rd (not yet developed).

It does seem to us that there is a major role for the CCB to identify (and champion) the need for early land reservation both for coastal reserves (and adjacent municipal purposes) and for future access by road and rail to those coastal areas that might be developed throughout the CCR over the next 50 years. Examples of such opportunities are given throughout this submission. If this identification and advocacy is not to be role of the CCB, at least the CCB should identify who might be more suited, and strive mightily to ensure it is being done.

Regional Priority 1- Population growth balancing access and valuing natural environment

Priority 1 focuses on the requirement to balance access to coastal areas with the needs of the environment, recognising the pressures arising from the projected population growth over the next 35 years.

One very important point identified on p.20 of DPRCP2015-2020 is the risk of reaching “tipping points” as the population of Melbourne increases. What is not adequately stressed in the document as a whole is that these tipping points will be reached at different times for different parts of the bay because:

- the population growth will be geographically focussed in particular areas of Melbourne,
- the current availability of, and access to, coastal resources to the broad population is heavily biased towards the Eastern side of the Bay, and
- the current status of development and amenity of the coastal resources of the western side of the Melbourne is radically inferior to that on the east.

It is noteworthy that although full length of coast within the municipal boundaries of Wyndham (including the Western Treatment Plant) is 27km, but the section of the coast for which Wyndham council is the Committee of Management comprises only 7.5 km. The balance of the coast within Wyndham includes areas managed by Melbourne Water (Werribee Sewage Treatment Plant and its buffer zones), Parks Victoria (Point Cook Coastal Park) and the Commonwealth (Point Cook RAAF base). Two of these contain important RAMSAR wetlands. All of these are not only extensive in terms of the length of coast involved but also extensive in terms of land area. Thus there is already a very heavy (justifiable) emphasis on environmental considerations in the West and particular affecting Wyndham.

Interestingly, the current development process for new subdivisions in the Wyndham municipality includes the establishment of extensive linear wetland systems, partly for management of storm water, (reducing surges in fresh water flows) and also to provide habitat for endangered species local to the area, including the growling grass frog. This initiative significantly improves the quality of storm water flowing into the bay but may not be recognised as relevant to the “Coast” because it takes place well inland.

Since so much of the land area and such a high proportion of the coastline around Wyndham is controlled by others and/or substantially dedicated to environmental purposes, in our view the remainder of the land (that is, the parts of the coast that are controlled by Wyndham Council as the Committee of Management) should have a significantly lower level of emphasis on direct environmental issues than may be the case in other areas. It follows that a “one size fits all” approach to environmental constraints may not be appropriate for all of the different Committees of Management within the CCR. We discuss that concept more under comments on Regional Priority 4

Another environmental aspect that has attracted attention over the years has been the presence of the Werribee South Intensive agricultural precinct (IAP) in the Wyndham area. This area of more than 3000 hectares of irrigated farm land produces a significant proportion of Brassica crops for Australia, including cabbages, cauliflower and broccoli, plus some of the summer lettuce.

Whilst originally the water for irrigation in the IAP came from the Werribee River and other fresh water sources, it now comes substantially from the Werribee Treatment Plant. Thus the water delivered to the farms for irrigation is already loaded with nutrients and has a substantial salt content. In addition, a significant quantity of nutrients (including chicken manure) is added to the soil by the farmers as part of their farming practice. A substantial part of the irrigation water then becomes run-off into the bay since there is no capability to intercept the run-off and divert it elsewhere. There have been quite a number of technical reports over many years that suggest that this run-off from the IAP harms the adjacent sea-grass meadows and seaweed beds in the bay and reduces the fish population, but no action has ever been taken to change the situation – it has been in the “too hard basket”.

Currently, both the Victorian Government and Wyndham Council are committed to the continuation of the Werribee South IAP, as it is both an important employer for the area and an economic input to the Victorian Economy. However, the IAP is facing a number of challenges to its viability, including:

- The farms are quite small (average land holding is about 20 acres)
- The produce is increasingly sold to the oligopolistic supermarket chains and the sellers are therefore price-takers. Prices have accordingly been falling for years in real terms much faster than the ability of farmers to lower input costs though improved efficiencies.
- The produce is often sold on contracts that require deliveries spread over the year, requiring each farmer (or group of farmers) to make a large number of small plantings rather than a small number of large plantings. This further increases their costs.
- The cost-price squeeze leads to an excessive number of crops per year on the land, denying the opportunity to fallow the land reducing its natural fertility and increasing concentrations of external nutrients.

In other analogous industries such as the dairy industry, the competitive response of farmers has been to consolidate farms so as to obtain both economies of scale and increased market power. The small Werribee farms generally have a number of houses on each of them (as a hangover from the days of labour-intensive family farms) and this, plus the capital cost of large equipment fleets and separate irrigation plumping plants for each small land-holding, together militates against relatively painless amalgamations. Certainly many of the farmers are leasing their land for not much more than the annual cost of the water rights, and hoping against hope that the land will soon be allowed to be subdivided for housing.

It may be expected that over time these forces may drive the relocation of the IAP to another site where larger, economic farms can be established or where different farming methods may apply. At present, there are proposals for large hydroponic greenhouses to be established north of Werribee and this is one possible alternative. Another is to establish a new IAP on the other side of the Western Treatment Plant. This would enable establishment of much larger farms and in addition, could allow the run off from the farms to go back to the Western Treatment Plant and diverted through the existing large lagoon systems that remove or reduce the excess nutrients before the water runs into the sea.

It seems likely that over time one of these options (or some other alternative) will effectively mean that the IAP relocates from the Werribee South area and that land then become available for subdivision into housing. If this were to happen, it would create an opportunity to develop new, beach-side suburbs, and with it, the challenge to ensure that the necessary infrastructure existed for this to work effectively.

There is a current project building a new, full-diamond Geelong Freeway interchange at the point where Sneydes Rd crosses the Maltby Bypass Road. This will create the preferred point to enable transfer of traffic into the new Employment, Technology and Housing Precincts of East Werribee to and from Melbourne and Geelong. These new precincts are to be established either side of the freeway between Wattle Avenue and Hacketts Rd. This development is expected to bring 58,000 over the next 15-20 years.

It is very likely that the VicRoads and municipal planners between them will take account of the potential traffic demands of these new precincts when reserving land around the precincts. But this large new diamond interchange, positioned as it is between the intersections of the Freeway with the Western Ring Road and the (future) Outer Ring Rd would be an ideal point for the people from the Northern suburbs, Geelong and the rest of Melbourne to gain access to the Coast at Wyndham.

It would therefore seem sensible to reserve sufficiently wide road easements to carry the local precinct traffic plus any future anticipated coastal-bound traffic at the volumes that might be expected in 2050 or even 2100. Some of that land is currently publicly owned and other parts subject to current or imminent PSP processes. Our question is, who might have the over-arching vision to identify the need to include the potential requirement for coastal traffic, and to initiate discussions with the responsible authorities?

We believe the parties should include the CCG, to at least identify its view of the potential for future development along the nearby coastal areas. This potential should include both the possibility that the Werribee South IAP might relocate, plus the other opportunities to increase the areas accessible to the public that are discussed in this submission under Regional Priority 3.

Regional Priority 2 - Adapting to a changing climate and increased coastal hazards

“The Central Region’s coast is enjoyed and loved by millions of residents and visitors alike.”
(DCRCP2015-20, Chair’s Foreword).

“A changing climate has the potential to make existing coastal hazards more severe and to bring about increased rates of erosion and more extensive flooding. The primary causes of coastal flooding are storm surges combining with high tides (storm tides) and extreme weather events – these extreme events are predicted to be more common in the future. As set out in the Victorian Climate Change Adaptation Plan 2013, adapting to changes in the climate means acting to reduce risks, increase resilience and take advantage of any new opportunities.” DPRCP2015-2020 (p.21)

Port Phillip Bay has gone through many changes over the last ten or fifteen thousand years. In the time before the last major rise in sea levels, it was a large valley with rivers flowing through it to the sea outside the heads. When the sea levels rose, it became a bay that presented to the first European settlers a treasure trove of fish, whales, seals, dolphins and other delights of the sea.

Many years of European settlement and urban development have massively depleted the stocks and varieties of fish and other marine life.

With the forecast changes in climate, sea levels and weather, we should perhaps also be looking at opportunities rather than just at challenges. What changes do we expect might occur in the varieties of fish that might flourish in the bay? What sea weeds and sea grasses might grow there? What plants might grow at the sea shore?

There is a small patch of mangroves in the Stony Creek estuary near the Westgate Bridge and another near the mouth of Kororoit Creek. Would we expect this to extend more widely round the bay and if so where? What if anything should we do to encourage any increase in such diversity and what effect might it have on the marine population of the bay? Who should be responsible to consider these matters and what should be done to encourage any beneficial outcomes? Is there a role here for the CCB?

In areas such as Williamstown, Albert Park, Brighton and Sorrento, the coastal facilities are enjoyed by many thousands of people, and the extent of that patronage is substantially due to the heavy investment in a high quality of built environment that has continued over many years. Part of that built environment includes the benefit of an on-going program of beach nourishment to ensure that the sand stocks are not simply dependent on natural sand replenishment. Many also have permanent, attractive bluestone rock walls or similar constructions to facilitate easy access and to control erosion. None of these features exist for Wyndham.

A significant part of the growth in Melbourne's population is now taking place in the West. This includes Wyndham of course, but also to the North in areas such as Derrimut and Melton. The shorter travel times from Western suburbs to the CBD are likely to increase this tendency for growth in the west. And there is the increasing tendency towards higher density housing in inner areas and the relatively lower land values in the inner western and northern suburbs is likely to also contribute towards an increasing proportion of Melbourne's population growth being on the north and western sides of the city. Of course, there are no coastal areas in the north and any demand for access to the coast by those people will need to be met by resources in the East or the West.

The major part of the population of Melbourne is on the East and that will continue to be true, and a combination of demand by the larger Eastern population and the longer travel distances from the northern suburbs to the eastern coast will tend to force the northern and western population to go to the western coast.

There are very limited coastal areas accessible in the West nearby to the urban areas (mostly in Hobsons Bay and Wyndham), and the limited extent of current development of these coastal areas can be expected to rapidly increase pressure for their further development. Of course, there are good coastal resources further to the west, both on the Bay at Geelong and further south, and on the Surf Coast, and these will also experience a rapid surge in demand.

Within Wyndham, some provision is already being made for the forecast rise in sea levels for new subdivisions in those sections of the municipality that are at relatively low elevations.

For example, in the Point Cook region, substantial importation of fill is used to raise the general level of the land by appropriate amounts, and no doubt this will continue as new areas are released for subdivision or other development. However, there is currently no activity aimed at protecting the coast from erosion even though the need has been identified in a number of reports going back for many years.

One of the most notable is the report to the Wyndham City Council by KLM Gerner Consulting Group in association with Coastal Engineering Solutions, in February 2003. On page 10 of that report, the consultants report that "Steep and eroding cliff faces ...occur along much of the length of the coastal strip.These cliffs have in part, been protected by both formal and informal rock beaching". However, some of that rock beaching was compromised by the storm events of July 2014 and there was also damage to some other erosion mitigation assets. It appears that the formal rock beaching was installed by some Government agency, perhaps 50 years ago. There has been little work of that type carried out in the area since then.

The informal work has been carried out by Boatshed owners and/or local farmers to resist the erosion forces of the sea and storms between the 1930s and recent times. Under the heading "Ad hoc Groynes, boat ramps and associated structures" on p.11 of the KLM Gerner report, the consultants say that "whilst concern has been raised about the damage these (informal) structures may be doing to coastal processes and degrading the beach areas, a review of historical aerial photos and site analysis has indicated that these structures are preventing scour from the shed fronts and is assisting in the entrapment of sand." The past informal practices have often been effective in preserving parts the coastline in the area from serious erosion.

DPRCP2015-2020 (p.16) gives very good examples of the forces that nature can bring to bear on the coast. And in the case study, examples are given of the remediation of sea walls and other infrastructure at considerable expense, although it is not revealed from where the funds came for this work. There are no examples to quote for similar works in the Wyndham area and this is in part due to the lack of significant formal protective infrastructure to be repaired and in part to the lack of resources in the Wyndham area to identify needs and take action to implement repair works. This resource issue is discussed in more detail under Regional Priority 4 below.

The only access to the Baileys Beach part of the Wyndham Boatshed Precinct (including access to part of an adjacent farm) is along that part of Cunninghams Rd that runs along the shoreline. There is a section of this road east of the start of those boatsheds, where the erosion is approaching the stage that the road may soon be threatened by another major storm surge and that section of the road may disappear. If that were to happen, the boatsheds with Cunninghams Rd addresses would become inaccessible, unusable and unmaintainable.

In striking contrast to the examples quoted in the Case Study on page 16 of the DPRCP2015-2020, there does not yet seem to be any works program to deal with this particular issue or others that have occurred in the area.

Indeed, when a concerned boatshed owner asked permission to himself repair damage to informal erosion controls near his boatshed that had been damaged by the July 2014 storm, he was invited by the authorities to go through a long process including:

- Preparing detailed drawings of the proposed works.
- Investigating whether the proposed works would first require Aboriginal Archaeological clearance.
- Applying for permission to apply for a Planning Permit for the proposed works
- Once obtaining permission to apply, applying for a Planning Permit for the proposed works.
- Once obtaining a Planning Permit, applying for a Building Permit for the proposed works.
- Once obtaining a Building Permit, carrying out the proposed works at his own expense, with relevant inspections.

All this for protective works that are not on his license area, protected a number of boatsheds and which in all probability he is not legally entitled to do. It was all too hard, nothing has been done, and the threat to the boatsheds, and the coastal reserve itself, remains.

The issue of providing resources to the local authority to address these issues (in developing a rational process, getting it approved and then in managing approvals for such works) is discussed in some detail under RP4 below, but no doubt this sort of problem of how to deliver urgent remedial action after storm events occurs right around the bay, and there are probably already a range of practical solutions of various sorts that do (or could) effectively deal with them.

There is a discussion in RP 4 below that quite large proportion of the coastal strip in Wyndham is very narrow. Unless a process to protect the coast from erosion is urgently implemented, the coastal strip at Wyndham will become even narrower and may even disappear in some areas.

One task the CCB could urgently undertake would be to collate the range of approaches taken to manage erosion issues around the bays and convene a discussion of the relevant authorities and interested parties on developing a set of protocols that allows remedial action in the appropriate timeframes. WBA would be eager to be party to such discussions. In the absence of current access to any such protocols, WBA has been trying to arrange a tri-partite meeting with Wyndham Council and DEPI to ensure that all parties are aware of the constraints on volunteer action under present legislation and the implications for the maintenance (as currently resourced) of the foreshore, its current High Water line, public safety and the longevity of the boatsheds. So far there has been no success in arranging such a meeting and action is stalled. Hopefully, solutions regularly used in other locations can soon be applied in Wyndham to limit the vulnerability of the current assets.

Regional Priority 3 - Integrating coastal planning and management

“The Central Coastal Region has many bodies responsible for land and water management along and across the coast. Forty different managers manage the coastline and many more the water, waterways and catchments. The complexity of managers and management responsibilities can at times appear confusing. Application of the principle of integrated coastal zone management is needed to collaborate and co-ordinate coastal management across these boundaries. It is important to provide clarity about the roles, responsibilities and expectations for all regional agencies involved in managing the coast – especially where operating boundaries overlap. The Board will support the Victorian Coastal Council’s work to clarify regional roles and responsibilities and ensure that important initiatives are not delayed by disputes about roles and responsibilities.” DPRCP2015-2020 (p.24)

Real estate agents are fond of telling investors that "no one is making new beachfront land", but there is quite a bit of coastal land that is not currently readily accessible to the public.

One of the actions WBA would like to see included in the activities of the CCB is the provision of strong leadership in rationalisation of some of the bodies who are managing coastal assets. Ideally, rather than "The (Central Coastal) Board will support the Victorian Coastal Council's work to clarify regional roles and responsibilities and ensure that important initiatives are not delayed by disputes about roles and responsibilities", the CCB will identify opportunities to the VCC for such action and the benefits that would accrue to the public.

For example, the Commonwealth manages the old munitions land in Queens Rd, Altona opposite the golf course. This land has not been used for many years and is a wasted asset. It would be much better if the Commonwealth (having carried out any necessary remediation) handed that land to the Hobsons Bay City Council and it became municipal land able to be integrated with the coastal reserve into a valuable public resource.

The Point Cook RAAF air base, as the oldest continuously operating military air base in the world and as the venue for the RMIT Flying School, needs to be preserved. However, the air base does not, on its face, seem to need the strip of land adjacent to the sea. Why should most of the coastal strip not be excised and handed over to Wyndham council, to manage along with its other responsibilities for the benefit of the public?

In addition, Point Cook RAAF base includes a rifle range and this is separately accessed by Rifle Range Rd. There were once other rifle ranges on the sea shore, at Williamstown and at Geelong (next to the Cheatham Salt Works), and both of these have been released. If the rifle range as a whole was released to the WCC, it would provide both a section of coastal reserve and land for development as an adjacent municipal reserve.

Given the pressure on governments to find money outside the budget, it would be tempting for the Commonwealth to sell such land for commercial purposes. We need a strong advocate for the allocation of these (and any other) potential additional coastal resources to supplement the currently meagre resource of publicly-accessible coastal in the west. The CCB could be such an advocate, if it was high on its priorities.

In the same way, it may be desirable to re-examine the boundaries of the Western Treatment Plant to see whether or not some parts of its Coastal Boundary might be released for public access. Attention might initially be focused on the areas just west of the Werribee River estuary, with a simple high level footbridge across the river.

In addition, the Point Cook Coastal Park controlled by Parks Victoria is accessible to the public only during the nominal daylight hours of 8:30am to 5-7pm depending on season. In Melbourne in summer, people enjoy time at the beach until quite late at night. Is it possible for the Central Coastal Board to make representations to Parks Victoria to change the hours and conditions of access? If Parks Victoria was not able to do that, could a section of the park be transferred to Wyndham Council as the Committee of Management, to achieve the same result?

Elsewhere in this submission we have discussed the shortage of Coastal areas accessible to the public in the Western part of the metropolitan region. Even relatively small elements that might be recovered for public use such as detailed above would be a significant increase in the resource available for community use. The above examples are drawn from the lands in the Wyndham Region that are managed by other bodies, where an increase in the resource available to the people of Wyndham and the areas inland could be relatively easily achieved. No doubt there are similar opportunities elsewhere in the Central Coastal Region.

Another planning area in which the Central Coastal Board could provide leadership is in the community-sensitive matter of Clothing Optional Beaches.

It has become modern practice to establish design criteria for significant developments in the community. One of the most significant of these in Victoria is the formulation of Precinct Structure Plans (PSP's) for new areas. The PSP process is mandated by the Victorian government and an excellent example can be seen at <http://www.mpa.vic.gov.au/wp-content/uploads/2013/04/Wyndham-C171-and-172-Panel-Report-22-November-2013.pdf>

WBA is not aware that any formal planning process analogous to a PSP was adopted for the introduction of clothing optional beaches in Victoria, and certainly the local community was not consulted with regard to the selection of Campbells Cove for such a beach. Indeed, since Campbells Cove has proven to be totally unsatisfactory for users of a clothing optional beach, it also seems unlikely that the potential users were consulted.

Any discussion on Clothing Optional beaches should probably take place using a more general term than "Clothing Optional", because that description necessarily implies a mix of clothed and unclothed people sharing facilities. That mixed usage necessarily arises from the legislative approach taken in the Nudity (Prescribed Areas) Act 1983, but it may not be the most desirable solution as far as either users or the general public are concerned.

Whilst a modest attempt by WBA to identify through an internet search any established set of design criteria for a clothing optional beach has been unsuccessful, it would seem unlikely that no such criteria exist, particularly as there are many such facilities, both private (clubs and commercial) and public throughout the world. Even if a generally accepted set of criteria somewhere in the world exists, it would seem sensible that a process to consult Victorian users of such a facility, plus potentially affected non-users, should be followed in an open way - analogous to that followed for PSP and other planning processes.

WBA's view is that the design criteria for any Clothing Optional Beach should include, at least:

- A location, such as a cove or delineated by sand-dunes, such that it is difficult for members of the public, when walking along a normal beach, to inadvertently stray either into the clothing optional area or into sight of naked persons.
- A sufficiently large sandy beach, free of seaweed for most of the year, for the users to sunbake, without being forced to crowd into excessive proximity with each other.
- A large enough block of land to enable construction of a dedicated car park for users well within the warning signs advising of the Clothing Optional Beach area (or nude bathing area) and screened from view by the public.

- The actual clothing optional area (or nude bathing area) to extend from the dedicated car park (where users could secure their clothes and valuables in their cars) through to the beach itself.

The current location at Campbells Cove satisfies none of these criteria.

Wyndham Council has made a submission to the Victorian Government (supported by the WBA) for the Clothing Optional Beach at Campbells Cove to be relocated to a more suitable site. It would seem desirable for a set of design criteria to be developed before a new site was selected and these criteria could be applied to the other Clothing Optional Beaches in Central Coastal Region. There is adequate evidence that Campbells Cove is rarely used by legitimate clothing-optional sunbathers and so the cessation of its proclaimed designation need not wait on the establishment of an alternative location. Indeed, the closure could well cause a groundswell of opinion that accelerated the development of appropriate design criteria. Who other than the Central Coastal Board should lead such an initiative for the benefit of a part of our society who wants to use the beach in a way accepted in much of the rest of the world, without introducing a major disbenefit to many others?

Regional Priority 4 - Sustainable and equitable funding mechanisms for coastal infrastructure and management

The physical benefits of the Central Coastal region coast are able to be enjoyed by almost all Victorians (although more directly by the local communities) and some of the economic benefits do flow through to the entire Victorian community. It follows that the cost of meeting the challenges set out in the DCRCP2015-20 should be equitably shared by the whole community.

The extent to which people can share in the benefits of a particular area depend to a large degree on a combination of:

1. The particular physical characteristics of the local environment, and
2. The quality of the local infrastructure that preserves those highly valued characteristics, and
3. The quality of the local infrastructure that which provides appropriate access to the area.

The level of funding, and its predictability, needs to be sufficient to preserve that which exists and to develop that which does not yet exist.

The challenge for Wyndham includes all of the 6 Regional Priorities identified in DPRCP2015-2020. WCC has always been conscious of these challenges and the need to plan to meet them. As part of that endeavour, over the years WCC has commissioned or received a number of reports and made a number of plans on what needs to be done to meet these challenges. The reports have included, amongst others:

- Werribee South Boatshed Precinct Improvement Plan – KLM Gerner Consulting Group in association with Coastal Engineering Solutions - February 2003
- Wyndham Boatshed Management Policy 2003
- Water Technologies Pty Ltd - "Wyndham harbour- Coastal process Report - July 2010"
- Final report Wyndham Coastal Scoping Study – URS 4 April 2012

All Committees of Management face challenges, but Wyndham faces more than most:

- Wyndham is the second fastest growing municipality by percentage in Victoria, and also the second fastest growing with Committee of Management responsibilities for a Coastal Region (in both cases after Casey). And this is likely to become more of a challenge. The report “Victoria in the Future 2014” forecasts that in the period 2011-2031, Wyndham will be the fastest growing Victorian municipality with another 201,00 people added, a doubling in size from the current level in just 20 years.
- A comparison of figures published by the MAV for 2013-4 Melbourne’s Coastal municipalities shows that there is a significant imbalance between them as far as financial resources are concerned.

Council	Median residential value \$'000	2014 Av domestic Rate per assessment \$	2014 Av domestic Rate per head \$
Bayside	935	1830	794
Port Philip	570	1555	1028
Kingston	530	1676	781
Mornington Peninsula	447	1417	888
Wyndham	387	1902	775
Frankston	377	1653	743
Casey	350	1722	625
Cardinia	340	1828	741
Hobsons Bay	317	1737	666

Of the municipalities with Coastal Planning and Management responsibilities in the Victorian Central Coastal Region, Wyndham and Casey both face massive financial demands to provide the community infrastructure associated directly with the growth in their population. Wyndham already has the highest average domestic rate per assessment.

Brighton (Bayside) and Albert Park (Port Philip) are second and third in the ABS list of highest ranked incomes for Victorian Statistical Areas.

An additional dimension to the challenge for Wyndham, Casey and Cardinia is that the current state of development of their coastal infrastructure is vastly inferior to the others. For these three municipalities, with the non-deferrable demands to provide general community infrastructure arising from rapid expansion of their suburban areas and the associated population growth, there is insufficient funding available to implement their well-intentioned plans for the coastal regions.

This funding shortfall extends not only to the capital and recurrent expenditure entailed in those plans but also, and importantly, in the funds to recruit and retain the knowledgeable and skilled personnel able to manage the stakeholder consultation processes, the lobbying effort to obtain funding, and the management of the implementation activities, all necessary to ensure the critical elements of the Wyndham Coastal Strategies are achieved.

Examples of initiatives in Wyndham that need urgent funding include:

1. Width of Coastal Strip within Wyndham

The width of the public Coastal Strip in most of Wyndham is inadequate by any measure for reasonable access by the people. There needs to be associated municipal areas as well as the Crown Reserve if people are to be able to enjoy the areas. In addition there needs to be land available for swimming clubs, yacht clubs, life saving clubs, boat launching ramps, etc plus provision for parking and toilet blocks. The particular implication of providing public toilets in an unsewered environment is discussed elsewhere in this submission. In addition, there has long been an identified need for the extension of the Bay Trail through to the Werribee River, and there is insufficient land available for that purpose.

At the current stage of development of the area, the cost of reservation or acquisition of land for these purposes will be much lower than it will be once development pressures grow, especially if land values become inflated by an increased expectation of potential residential subdivision.

2. Erosion

As discussed under Regional Priority 2 above, erosion of the coastal reserve is increasing today and the rate of increase is expected to escalate due to rising sea levels and more violent storms (Sections 3.1 and 3.2 of the DPRCP2015-2020). The degree of protection of the land/sea interface is already manifestly adequate. Funding is urgently required for this matter.

3. Environmental Management

There are two quite different issues here for Wyndham.

- a. Until such time as funding becomes available for WCC to be able to adequately maintain the areas under its remit as COM, it needs to have sufficient funding to engage in adequate consultation with stakeholders so that the available resource of volunteers may be effectively mobilised. This requires that WCC has qualified staff with the time to get to understand the local issues, negotiate authority from DEPI to arrive at management protocols relevant to the particular situation at each site, and monitor and report on progress. Typical of the problems experienced to date, the WCC letter of 26 September 2002 advised in Item 3 that it was intended to establish a Boatshed Precinct Advisory Committee comprising:

- Ward Councillor
- Representatives of the Boatshed Community
- Representative of Council's Asset Management Department
- Representative of Council's Community Access Department

Unfortunately funding for councillors and council officers to establish and participate in such a committee has not yet made it through the Council's budget process due to other, higher priority needs.

- b. As discussed under Regional Priority 3, a major part of the coastline (some 18 km) and very large areas of land in Wyndham are reserved for conservation (RAMSAR, wetlands, Coastal Parks, etc). The very limited land that is under WCC management (7.2km) needs to be managed in a way that is compatible with the expected fairly dense population pressures that will come to bear as access to the public is improved.

There is a significant difference between the environmental policies that were in place at the time the older coastal areas (eg Albert Park, St Kilda and Brighton) were developed and those currently being applied to areas such as Black Rock and the Mornington Peninsula. The introduction of requirements for preservation of native vegetation is both understandable and praiseworthy for a situation where there is in excess of 100km of continuous coastline on the eastern side of the bay almost completely accessible to the public. However, the type of development that has occurred in locations such as Albert Park allows generally more intensive occupation of the beach areas than that operates say, between Rosebud and Tootgarook.

Do we need to have modified externally-applied environmental requirements applicable to Wyndham so that the majority of the limited areas of publicly accessible land in Wyndham is actually fully accessible to the various classes of users? WCC needs funding to recruit staff with appropriate skills and sufficient time to develop a more holistic and tailored approach to its role as COM, having regard not only to the needs of Wyndham ratepayers, but also to the needs of the surrounding areas for which Wyndham's coastline could be the logical coastal recreational area, and to argue for that role to be enabled.

- c. Another recent example of a possible impact of insufficient funding on the ability to maximise the benefits to the community from activities that has taken place, is in the very important Wyndham Harbour development. This development includes a large, rock-armoured marine enclosure to create the sheltered area for the marina. The Water Technologies - "Wyndham harbour- Coastal Process Report - July 2010"¹ confirms that the natural sand migration in the area is from South to North and postulates that the rock walls will create beaches to the north and south of the marina.

It would be expected that in time, the North beach will become reasonably large and attractive. It appears from the limited information available that the North beach will be readily accessible from the internal roads in the Marina Development, but it is not clear from a superficial examination of the documentation whether it will be available to the public, apart from via the section of the Bay Trail to be constructed with access to Duncans Rd from the southwest, but not from the north west, since there is not yet any connection to public land on that side.

¹ <http://www.wyndham.vic.gov.au/var/files/uploads/pdfs/dfd3da1cb323d8b509f03f51c9137e55.pdf>

It must be conceded however that some of the Wyndham Harbour documentation suggests that the beaches and other facilities will be “public”, although often in formats that mix the “public” and “residents” together.²

The beach to the south will be smaller, and accessible to the public from Duncans Rd. As far as can be ascertained at present, Council has had no resources to consider the provision of car parking for the potentially significant volume of users of that beach.

Further, the Wyndham Harbour - Coastal Process Report suggests that the presence of the marine development will interrupt the flow of sand to the coastline further north, and whilst there is discussion on the building of structures (including a pipeline and pump stations) that divert sand flows around the harbour and the new north and south beaches, there appears to be little information on the possible interim effects on rates of erosion on shorelines further north, including at the boatsheds³.

WBA has only recently been provided with access to the Wyndham Harbour- Coastal Process Report 2014, to allow it to consider the implications of any such effects, and that review has only just commenced. However, considering the comments on coastal erosion above (under the heading Regional Priority 2, on page 7), it would seem highly desirable for WCC to be funded to have Water Technologies extend their review to include the interim effects on the northern beaches in more detail- not with the view to modifying the plans for Wyndham Harbour but rather to inform any decision on the urgency of any necessary erosion mitigation actions for that area.

² How will the local community benefit from the Wyndham Harbour development?

When all stages are complete, Wyndham Harbour will be the premium master planned waterfront community and marina on Port Phillip Bay. The development features include:

- Access to Port Phillip Bay – previously private land
- Safe boat harbour with up to 1000 wet berths
- Jobs and tourism
- Two new public beaches, bike and running paths, wetlands, recreation centre and tennis courts
- Fibre optic available to all residents
- Car parking
- CCTV coverage of main entry (including number plate recognition cameras)

<http://www.wyndhamharbour.com.au/vision/>

³ “A review of historical shoreline changes in the vicinity of the proposed development provides the following key observations relating to coastal processes in the area:

- The beaches in the area, where they occur, are generally narrow.
- More exposed sections of coast have been stabilised by rock beaching.
- There is a net northerly drift of sand along the coast.
- Offshore from the coast the sea bed comprises a thin layer of sand overlying clays.
- There has been little change to the coastline over the 32 years from 1966 to 1998.
- The rate of sand transport along the coast appears to be relatively small.
- The potential rate of transport of sand along the coast appears to exceed the actual supply of sand.
- When there is an increased supply of sand from the south, there may be a temporary build-up of sand along the coast, as in the build-up of sand in the central part of the site in 1989. (Note that by 1998 most of this build-up has gone.)

The proposed development will block the observed moderate longshore sediment transport regime and the breakwater will create a barrier to the net north-going drift of sand. As such, a beach would be expected to form in the area immediately to the south of the breakwater as sand accumulates in this area and there would be a corresponding net loss of sand from the beaches to the north of the development. Accordingly, a sand by-passing system is proposed in order to preserve the existing longshore sediment transport regime and minimise any loss of sand from northern beaches.” Wyndham Harbour - Coastal Process Report 2014, p. 30

These might include improvements to the rock beaching and other existing erosion prevention measures north east of the Harbour, or perhaps to modify the location for the dumping of some of the spoil from Parks Victoria's biennial dredging of the Werribee River mouth from the northern side of the river to a location somewhat north of the Marina during the construction phase and the early years after its completion.

Regional Priority 5 - Oversee the implementation of the recreational boating facilities framework for the central coastal region

WBA is not familiar with the content of the Recreational Boating Facilities Framework 2014 (RBFF) and it has not been accessible on the CCB website or through Google. WBA is not aware of any planned additional facilities for the area apart from the major Wyndham harbour development. The only other facilities available are the boat ramps at the Werribee River estuary at Werribee South township which have been vastly improved over recent years. Since these facilities have been improved, the demand has increased to utilise the available capacity.

Wyndham Harbour will provide significant storage and berthing facilities, especially for larger vessels and for a clientele with significant financial resources.

The Campbells Cove and Baileys Beach precinct provides the opportunity for a limited number of Boat Sheds located at the waters edge with some boats moored off shore during summer months, but no longer offers public boat launching ramps.

There is no Yacht club in Wyndham and insufficient land at present at the waters edge to enable the establishment of a yacht club.

There is a limited amount of permanent moorings in the Werribee River estuary and there may be potential for these to be expanded.

As far as we know, Wyndham council does not have either the budget or the personnel available to take any responsibility or initiative in further enhancing boat launching facilities

Regional Priority 6 - Sustainable visitation and tourism infrastructure service level hierarchy

Wyndham is already blessed by a significant infrastructure catering for visitation and tourism based on non-coastal activities including:

- The National Equestrian Centre
- Werribee Open Range Zoo
- Werribee Mansion
- etc

The area is well served by a variety of accommodation services, restaurants and other food outlets able to service a significant number of day trippers. These provide a strong base for growth in the demand arising from increased use of the coastal areas.

In addition, the boat launching facilities at Werribee South attract visitors from as far away as ???

The Werribee South Boatshed precinct brings people from as far away as Kyabram .Whilst there are only 140 or so boat sheds, many of these belong to family groups or clubs and attract significant numbers of visitors from a cohort of perhaps a thousand people.

The concurrent development of the new Employment, Technology and Housing Precincts of East Werribee would be expected to provide the scope to add some capacity as required. However, there would certainly be a need to expand the Werribee South township and other facilities along the coastal strip and demand grew and this would require some significant changes to the Green Wedge rules if the experience of the visitors was to be comparable with that of visitors to say, the Mornington Peninsula.

Regional Priority 7- Protecting significant coastal ecosystems and habitats

WBA's views on this matter are covered in the discussions under Regional Priorities 1, 2 and 4.

Regional Priority 8- Promoting Leadership, Co-ordination and Capacity Building for the Coast

WBA has made comments in the discussions under Regional Priorities 1, 2, 3 and 4 above on many aspects of leadership, coordination and capacity building.

There is no doubt that there are many volunteer groups and stakeholders with an interest in the health and amenity of the coast, and WBA is one of those groups. We are often frustrated by the fact that responsibility and authority for different aspects affecting what might be done is segregated into different groups and that limits our ability to act to prevent or mitigate harm, or to do good.

It would be useful if there was a facility like a central data Dropbox of Fact Sheets that contained details not only of what different groups were able to achieve around the bays (such as the stabilising works mentioned on p.31 of the DPRCP2015-2020), but also some details of the process that brought those about. It could also perhaps include the name and contact details of a key person to whom others could talk, so as to find out how to initiate similar projects elsewhere.

As stated in the introduction to this submission and in a number of places throughout, there is also a profound need for the CCB to take a visionary role, to think about what could be, and to champion the generation of ideas and debate about them. It will be more important to identify what is not being done and to sponsor it, than to seek small increments in the execution of those things that already have strong, established stakeholders with an existing channel to the sources of money and influence that enable their achievement.

Contact may be made with WBA to discuss this submission through any of:

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