

**Submission on behalf of Friends of the Gippsland Lakes (FoGL)
Re: Draft Gippsland Regional Coastal Plan**

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Thank you for the opportunity to provide suggestions and feedback on the Draft Gippsland Regional Coastal Plan. Representatives of FoGL, the Acting President and Secretary, attended the public workshop at Lakes Entrance on 24 February and circulated notes from that meeting to the FoGL membership for additional comments to include in this submission. The meeting was well-organized and informative.

Generally, the Gippsland Regional Coastal Plan is a well-thought-out document that highlights the need to conserve the natural attributes of the Gippsland Coast, as these natural attributes underpin both quality of life for residents and also make the Gippsland Lakes such a great tourist destination. A regional Gippsland-wide strategy could address the problems evident when different councils or authorities act in relative isolation of each other. If this process of developing a regional strategy can bring these bodies and the community onboard, to act in the best interest of the biodiversity and environmental health of the entire coastline, it will be a worthwhile process.

FoGL Comments on the Overall Strategy:

- **FoGL emphasizes that environmental health and biodiversity underpin everything else.** We must help the community, including business, to understand that without a healthy Gippsland Lakes environment, quality of life for residents and the attraction of Gippsland as a tourist destination will be seriously compromised.
- **The balance between environmental health and 'development' needs always to be in favour of the environment,** because of the first point made above. It is pointed out the Precautionary Principle is legislated *explicitly* within the following Federal environmental legislation.
 1. Environmental Protection and Biodiversity Conservation Act 1991
 2. Environmental Protection and Biodiversity Conservation Regulations 2000
 3. Environmental Planning and Assessment Regulations 2000
- **The 'Hierarchy of Principles' highlighted in the Executive summary is to be applauded. If all actions followed on from these principles, then all would be well.** This Hierarchy basically supports our first two points and states that first, significant Environmental values need to be protected and sustainable use of natural coastal resources be assured and THEN when the above have been addressed, development could be considered. Without Actions stated in the document, FoGL is unable to ascertain the extent to which this Hierarchy of Principles, which puts environmental values and sustainable use of resources FIRST would be honoured.
- **FoGL feels it is extremely important to find ways of working *with*, rather than *against*, natural processes when planning for the future and that it is always possible to respect natural coastal processes:** Section 3.1 of the Draft Plan, Natural coastal processes, paragraph 4: "The Victorian Coastal Strategy states that coastal planners and managers should respect natural coastal processes *wherever possible*" (italics added). There is significant research on natural coastal processes and the damage that built structures can do to those processes, particularly to saltmarshes and sand dunes. Dr Paul Boon highlighted some of this research at the recent Coastal Ecology forum held at Corner Inlet.
- **Placement of infrastructure needs to put environmental considerations first.** A FoGL member pointed out in section 2.1.2, paragraph 3, that the final sentence: "In some places, infrastructure such as pipelines for gas and oil need to go across foreshore areas." needs to be modified. This member points out that there are some places in which these things can be placed that are more environmentally damaging or risky than others. That the balance should always be in favour of least risk or damage to the environment, even when it costs more money. Again, if the Plan's stated Hierarchy of Principles were followed, this would be done as a matter of course.
- **There is no or little mention of animals or birds in the document and no mention of endangered species, flora or fauna, and they need to be included.** They are a huge part of our biodiversity, on which the entire planet depends. Their importance and their habitat needs should be made explicit in the document. Environmental connectivity for wildlife needs to be included in all development plans.

- **Abuse is abuse; it is not 'overloving'. Only when inappropriate and/or destructive behaviour is acknowledged, can steps be taken to deal with it.** The document seems to gloss over some of the real issues here. For example, while 'overuse' issues are mentioned, which relate to the pressure of sheer numbers, or too many people, even those doing the correct thing, *there is no mention of 'abuse' of resources*, which clearly happens, in some places, like the Silt Jetties, again and again and again. This 'abuse', such as littering, tearing down bollards and burning them, cutting down native vegetation, leaving faeces and toilet paper behind bushes, is not 'overuse' or 'overloving'. It is inappropriate behaviour by a few people which seriously degrades the environment and spoils the experience for others. The point here is that when a problem exists, we must acknowledge it. Please, include 'abuse' issues in the document.
- **Some amenity values are already sometimes severely compromised and there does not appear to be any suggestion of actions with which to address these.**
 1. Many ag-vet chemicals that runoff into the Lakes are not routinely monitored.
 2. How do we achieve clean beaches from all the litter?
 3. How do we stop residents from destroying native vegetation on public land for their view? Why aren't there severely heavy fines for this?
 4. How do we stop people building houses near the coast which seem ugly and intrusive from the water?
 5. Suggestion that regulations should require all built structures to blend in with the natural environment and not intrude or spoil others' enjoyment.
- **Low-impact activities need to be encouraged and supported.** Bicycling, kayaking, birding - have received little or no recognition in this document. Several FoGL members raised this and said it seems emphasis in the region is always on power boats, skiboats, jetskis, fishing and yachts.
 1. Identify times and places for quiet enjoyment: Skiboats and jet skiis, for example could be excluded from some parts of the Lakes or restricted to certain hours so that others could enjoy quiet time.
 2. There are no kayak ramps or facilities, which are desperately needed around the Silt Jetties. There needs to be a kayak ramp at Paynesville.
 3. More shared paths for walkers and cyclists
 4. Shared paths should be developed, for residents and tourists, around the foreshore, where environmentally appropriate.
- **Underpinning all issues of increasing use and abuse of natural resources is population.** One group represented at the public workshop (not FoGL) put the population problem on the table by asking: "What is the optimum population for East Gippsland? What is the optimum number/type of tourists?" Several FoGL members have since raised these issue as real concerns.
- **When does tourism impact negatively on the environment and/or residents' quality of life and what should be done about it?** What can be put into place to ensure tourism, even so-called 'eco-tourism' does not negatively impact on the environment? Or on residents' quality of life?
- **Reduce visitor numbers in sensitive areas and/or provide alternative, less environmentally-damaging ways of helping people enjoy the natural environment.** For example, instead of allowing unfettered walking through environmentally-sensitive areas, perhaps some boardwalks and viewing platforms could be built which contain visitor use.
- **Better public transport throughout Gippsland.** This was mentioned by several members as a way to reduce impact on the environment and to encourage low-impact tourism. For example, the return of train services has helped many bicycle tourists come to East Gippsland.
- **'Friends' groups, Landcare, Coastcare, etc are not sufficiently recognized in the document, particularly section 1.3**

FoGL thanks the Gippsland Coastal Board for the opportunity to participate in the process of reviewing the Gippsland Regional Coastal Plan. Again, FoGL would like to congratulate the Coastal Board on developing a positive, far-reaching document and for initiating the process of developing a regional-wide strategy for dealing with some of the serious issues we currently face and will face, due to climate change and pressures of population and tourism, in the future.