



PORT PHILLIP CONSERVATION COUNCIL INC.

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Victorian Coastal Strategy
Reply Paid 500
EAST MELBOURNE VIC 8002
submissions@vcc.vic.gov.au

Dear Victorian Coastal Council,

SUBMISSION FROM PORT PHILLIP CONSERVATION COUNCIL INC. ON THE DRAFT VICTORIAN COASTAL STRATEGY 2007

Port Phillip Conservation Council Inc. (PPCC Inc.) makes the following criticisms of the Draft Victorian Coastal Strategy (VCS) 2007 and the previous Victorian Coastal Strategy 2002. The VCS 2002 has failed to protect the coastal Crown land in and around Port Phillip Bay from inappropriate use and development. Its failures include:

- Not preventing a skate park on the Rosebud Foreshore
- Massive adverse impact on Safety Beach coast from Martha Cove Marina expansion
- Continuing to entertain rather than oppose the Frankston Marina Proposal
- Failure to oppose Port of Melbourne expansion and Channel Deepening, including enlarging the entrance to Port Phillip Bay
- Werribee South Marina and associated rezoning of Green Wedge land for development
- Not intervening in aspects of the Ansett and Norman Lodge subdivision at Mount Eliza, and failure to advocate public acquisition of freehold land to create a coastal reserve in that last gap in suburbia on the east coast of Port Phillip
- Support for plans for the overdevelopment and over-commercialization of Queenscliff Harbour and Portarlington Harbour

Similar failures have occurred at other sites on the Victorian coast. Massive impacts on the coast, such as a desalination plant at Wonthaggi, and proposed expansion of Hastings Port in Western Port, do not appear to be constrained by the Victorian Coastal Strategy.

The response contained in the draft October 2007 VCS to these continuing assaults on the Bay and the Victorian coastline is ineffective, and it will not adequately deal with these problems into the future.

PPCC Inc. considers that a more effective management tool for the coastline of Victoria would be the example expressed in the 1992-96 Port Phillip Bay Environmental Study, which was managed by the CSIRO. It is a landmark study of how the Bay operates and how it should be managed into the future. The VCS has been in existence for ten years now and it appears to have adopted very little of the management techniques as proposed in the Port Phillip Bay Environmental Study. There were 16 recommendations made for future management in that study, which should be applied to the whole of the Victorian coastline.

In particular under the heading 'Ecology No. 4' of the recommendations, it is stated 'The benthos are a vitally important component of the Bay ecosystem. To protect the biodiversity of the benthos and its key role in ecosystem function, habitat destruction must be reduced to a minimum. The effects of fishing, dredging and coastal engineering on seagrasses and the benthos must be minimised and should be closely monitored. The disposal of dredged spoil must be confined to as small an areas as possible.'

In 2008 Victoria's coastal zone is being subjected to one of the biggest dredging programs in the world and certainly the biggest ever in Port Phillip Bay, with unknown consequences for the wellbeing of the life of the Bay. Yet there is no acknowledgement in the Draft VCS of that dangerous development. On Page 41 of the Draft there is comment that commercial ports are significant contributors to the State's economy, but no qualifying statement that ports and shipping are causing irreparable damage to the Bay, or any suggestion that such economic benefits will be enduring, or could be secured by means involving less substantial alteration to the coastal environment, or that this project is also going to remove 550,000 cubic metres of rock from the entrance to the Bay, which is admitted will cause sea level rise in the Bay.

The rock removal will also affect endemic species, including sponge gardens and will cause rock falls into the Canyon. Toxic sediments from the bed of the Yarra are to be placed in a dredged material ground in the Bay, creating an unlicensed toxic waste dump, yet readers of the Draft are not made aware of this project or any other alternatives to this project. The foreword to the Draft states that 'The VCS will help us to keep ahead of emerging issues, particularly in relation to climate change. The vision and core principles of the strategy will always remain – that the conservation of the coast is central to our economic and social needs.' PPCC Inc. asks how this can be achieved if this Draft is adopted in its current form.

PPCC Inc. commends the 1992-96 Port Phillip Bay Environmental Study and its 16 recommendations as the preferred model for management of the entire Victorian coastline in preference to the proposed VCS 2007.

Yours sincerely,



Len Warfe
President
Port Phillip Conservation Council Inc.