

Marine and Coastal Strategy
Submission
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Prepared by the Association of Bayside Municipalities
in consultation with the Municipal Association of Victoria

Enquiries

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Contents

Introduction	3
Summary of key issues	3
(1) Policy intent not reflected strongly or clearly enough in the Strategy	3
(2) Funding insufficient to deliver on activities of the Strategy and address immediate risks	4
(3) Clear, concise planning guidance required	6
(4) Other matters of concern	6
Specific feedback on the draft strategy actions (and specific activities)	8
Background information	21
About the Municipal Association of Victoria	21
About the Association of Bayside Municipalities	21
The role of councils in the marine and coastal environment	21

Introduction

The Municipal Association of Victoria (MAV) and the Association of Bayside Municipalities (ABM) welcome the release of the *Draft Marine and Coastal Strategy* for public consultation.

The Strategy's recognition of Traditional Owner rights and aspirations is strongly supported by councils, recognising their deep connection to the land and sea for tens of thousands of years. Councils look forward to continuing to build relationships and understanding with Traditional Owners, supporting self-determination, as well as strengthening our knowledge sharing and partnerships to protect and manage the marine and coastal environment. Councils strongly support this level of engagement, recognition and commitment to Traditional Owner rights and aspirations being applied to all State Government strategies as a matter of priority.

In our response to the Draft Marine and Coastal Policy, local government called for “early and detailed discussion and engagement, to shape the approach and inform specific actions and activities that enable, clarify and support local government planning and management in the marine and coastal environment”. In providing feedback and input to this submission, several councils have expressed their appreciation for the Department of Environment, Land, Water and Planning (DELWP) engagement processes, despite the limitations of COVID lockdown / working from home. The multiple online forums held by DELWP provided an important means for many councils to have input to the Strategy development.

We seek further opportunity to work closely with DELWP in preparing the final Strategy, given the many roles and responsibilities that have been allocated to local government as lead or collaborator. It is critical that a final Strategy takes into account the varying resource and financial capacity across rural, regional and metropolitan councils in a rate-capped environment.

Due to timing and the constraints of COVID lockdown for many councils and council staff, this submission is informed by council officer input from Victorian coastal councils.

Summary of key issues

(1) Policy intent not reflected strongly or clearly enough in the Strategy

Local government position: *The draft Strategy requires further development to align with critical elements of the Marine and Coastal Policy. The Actions/Activities framework requires a rethink to better reflect the Policy, and support integration of both Policy and Strategy into regional and local planning, prioritisation and investment.*

The Marine and Coastal Policy set the framework for a new era for environmental protection, sustainable use, climate adaptation, planning, decision making and investment. The final version was informed by considerable feedback, with significant revision and redesign that set Victoria on a path of transformational change.

The draft Marine and Coastal Strategy needs to better reflect the framework for change established by the Policy. In its current form, the Strategy does not adequately reflect or align with the Policy and there is a concerning disconnect between what the Policy sets as its intentions and what the Strategy puts forward. This misalignment threatens to derail the many conversations and actions across stakeholders that were initiated because of the Policy.

The Policy included:

- A pathway to planning and decision making – clarifying how coastal land managers apply the principles and objectives of the Act. The logic of the Actions is inconsistent with the Planning and Decision Pathway of the Policy. Why does sustainable use and development come before climate adaptation in the draft Strategy? The ordering of Actions should be consistent with the Policy: Traditional Owner rights and aspirations, environment, climate adaptation, sustainable use and development.
- Stronger direction on climate change impacts, managing coastal hazard risk and adaptation responses – setting out adaptation actions in order of consideration providing greater clarity for councils in their planning and management responses. Activities need reflect the actions and order set out in the Policy. There are inconsistencies in the draft Strategy.
- A focus on cultural values and heritage sites – however it is unclear how the identification, assessment (and reassessment), protection and management of cultural values and heritage sites will be resourced and addressed.
- A focus on coastal settlements – however it is unclear in the Strategy how the policies will be achieved. For example, a review of coastal design guidelines or a ministerial direction? The vastly different framework of the Strategy (Actions / Activities) compared to the Policy chapters makes it difficult to find corresponding activities that clearly correlate with the Policy.

Councils would welcome the opportunity to further engage and support DELWP to revisit the structure and language intent of the Strategy, to bring greater alignment with the Policy. This is important not only for councils but for all agencies and organisations that need to draw on these documents to inform development of business cases for prioritisation and investment, strategic planning and decision making.

Action > activity hierarchy confusing

The action > activity hierarchy used throughout the draft Strategy is confusing. The academic literature on “Theory of Activity” suggests that an activity is an overarching label for a suite of actions. It is confusing then having activities to support an action, when common logic suggests a multitude of actions will contribute to the activity.

That said, the similarity between activity and action makes it difficult to differentiate between the two. We suggest greater clarity would be achieved by using a different framework / language altogether, with clearer alignment to the Policy. An option could be reframing the ‘Actions’ as directions, and include overarching intended outcomes, supported by actions.

Note: for the purpose of providing feedback on the draft Strategy, the current hierarchy of action > activity will be used.

(2) Funding insufficient to deliver on activities of the Strategy and address immediate risks

Local government position: Concern – the draft Strategy does not go far enough to address the current issues, risks and costs associated with managing the coast, in particular a coastline of ageing infrastructure, existing coastal damage, safety risks, beach renourishment and increasing coastal hazards in the face of climate change.

Action 6 suggests that over the next five years we will focus on auditing – understanding funding sources, collating funding needs, developing economic accounts, looking at funding options and creating plans. Councils agree these activities are critical to future strategic prioritisation and targeted investment in our marine and coastal environment.

Councils are highly concerned, however, that for the next five years there is little evidence of any funding for the marine and coastal environment and no investment to address the critical issues facing the coast now. We cannot afford to review and plan for the next five years while our communities and coasts are dealing with immediate risks to cultural heritage sites, poor condition and safety risks of existing coastal assets, environmental degradation, and much more. It is understood that grant funds will be made available as part of the Victoria’s Resilient Coast Program. The State needs to fast track development of this program and provide targeted support to councils in the immediate-short term as we progress development of what the future state-local partnership for coastal climate adaptation will look like.

The Activities in Action 6 appear to assume that councils, and other coastal Crown land managers have the necessary funds to maintain and manage the marine and coastal environment. It appears there is an underlying expectation that new funding can be sourced from councils or committees of management. This assumption is not correct. Councils are concerned there continues to be an expectation within State Government that local government will and can do more with less funds. It is unreasonable to expect that additional funds will be found within existing budgets in a rate-capped environment. While councils agree that all relevant stakeholders need to work together to manage the scale of the issues at play now and into the future, the draft Strategy infers much of the funding and land management falls to coastal councils. This is not in keeping with the scale of the issue and the role Victoria’s coastline plays as a valued destination for all Victorians and Victoria’s tourism industry.

The draft Strategy reads as requirements and commitments to action, yet not all activities have the funding or resources to be delivered. The Strategy must make clear which activities currently have funding, or funding is/will be made available versus unfunded.

Local governments are listed as lead or collaborator in 76% of the strategy actions – of the 51 listed actions, local government are lead for 8 and collaborator for 30. This assumes a level of resources and funding across local government that is not guaranteed within existing budgets, resource constraints and other priorities across all councils. Effective implementation of the strategy needs to recognise the variability across councils to resource and fund this work.

Suggestion: The Strategy must be expanded to include urgent prioritisation and investment of funds that address immediate critical issues. In addition, councils seek greater clarity in the Strategy on:

- differentiating state and coastal Crown land manager expectations to fund Strategy activities and actions
- expectations for financial or resource contributions from councils to support lead/collaboration on activities
- mechanisms for requiring other organisations / beneficiaries to co-fund or contribute.

(3) Clear, concise **planning guidance** required

Councils welcome the comprehensive suite of activities to support adaptation to climate change.

Councils call for the State Government to assert their shared responsibility for protecting coastal communities and environments through clear and concise planning guidance and investment. This must include upskilling planners and decision makers in planning for coastlines and associated hazards. This is of high importance considering the liability risks for decision makers as the built environment's vulnerability to hazards increases.

Councils request that the State's coastal planning activities adopt a more consistent approach. This should be aided by Ministerial Amendments that drive important coastal planning projects across the State, as well as State-wide leadership on developing and applying a range of planning tools to protect vulnerable coastlines and communities from coastal hazards.

The application of flood and inundation amendments and coastal climate change amendments should follow a science-based amendment process. This should be aided by Ministerial intervention. Planning for coastal hazards should take a similar approach used to develop and implement bushfire overlays. This involves a State led initiative supported by strong data and science-based planning decisions which will give clarity and guidance for planners and land managers along the coast.

(4) Other matters of concern

a. Maintenance and renewal of assets

State Government and Council managed coastal infrastructure is functionally important and widely valued by Victorians, such as beach access points, jetties, wharves, boat ramps, training walls, revetments, and paths. The strategy does not appear to provide a clearly defined and strategic approach to addressing the significant costs to maintain and renew these assets, nor the liability and risk associated with aging infrastructure on our coast.

Councils are seeking specific activities in the Strategy that will provide direction for councils about how to manage existing assets, and communities at risk. It is suggested the strategy include development of a long term (10 year) financial plan that provides for maintenance and renewal of state and locally managed assets, based on the audit of all coastal assets.

b. Groundwater not mentioned in Strategy

A ground water impacts study forms part of the Port Phillip Bay Hazard Assessment Project. This information is important for Councils due to the potential impacts of increased salinity levels in ground water as a result of sea level rise and the projected changes to ground water quality due to climate change. There does not appear to be any mention of groundwater in the draft Strategy which is at odds with other work undertaken by DELWP to date. The Strategy should include interventions to monitor and plan for ground water impacts on account to sea level rise into the future.

c. Role of local government in marine management

Many councils are concerned / unclear what their role in marine management is, including the expectation of councils in the context of marine spatial planning? Engagement with councils is required to clarify the responsibility of councils to plan, manage and implement actions/projects in the marine environment. This issue has become critical for councils preparing Coastal and

Marine Management Plans. An urgent response is required, which includes direct engagement with councils and clarity provided in the final strategy.

d. Broadening the definition of the marine and coastal sector

Achievement of the Policy and Strategy relies on involvement and investment from organisations and sectors that may not traditionally see themselves as part of the marine and coastal sector, including the development industry, tourism operators, transport (roads) providers, real estate agents, and more

Suggestion: propose that the Strategy needs to identify this broader definition of the marine and coastal sector as future planning, climate adaptation initiatives, partnerships and co-investment rely on their inclusion. This broader sector will play a critical role in growing and normalising the conversation of coastal climate change and adaptation with the community.

e. Concept of this being Strategy 1 of 3 needs to be clearer

Councils suggest the strategy needs to show the activities that are critical in the first five years, compared to those that are the foundation or framework for strategies 2 or 3. It's not clear which activities are achievable in the 5-year timeframe, or possibly critical to strategy 1 as a step towards achieving a longer-term outcome by 15 years? This needs to be made clear.

The timing for each activity could be used to communicate how it fits in the cycle across three strategies. For example, showing the timing in the context of immediate (short term), medium term (later stages of strategy 1), long term (starts in strategy 1 with flow on into strategy 2 and 3 where relevant).

Clarifying the timing across the Strategy would assist councils in their planning and budget cycles.

f. Strategy or a blueprint?

Page 33, "Implementing and Evaluating the Strategy" suggests the strategy is a blueprint for investment. The Marine and Coastal Act requires a Marine and Coastal Strategy to be developed, outlining priority actions to achieve the Marine and Coastal Policy. The requirement is a Strategy, not a blueprint for investment. The language of a blueprint confuses the intent of Strategy.

g. Language and clarity of intent

Some of the activity statements are very broad, making them open to interpretation, which risks being interpreted as optional or limiting. This makes it difficult for councils to leverage off the Strategy to prepare business cases for investment, inform decision-making and support new partnerships. Activities would benefit from a described outcome, to ensure the full intent is understood and can be taken up.

Suggestion: the intent of activities needs to be clear, with direct and enabling language to support business cases, prioritisation and investment locally, as well as advocating for regional-state investment. Activities need to be measurable. Actions need to include desired outcome to assist in clarifying the intent, and to support evaluation of activities against each action.

h. Council engagement

Council request that future engagement with local government in relation to strategy activities provide a minimum eight-week cycle to allow for a thorough review and report through council processes, especially for activities that require resources or funding from councils.

Specific feedback on the draft strategy actions (and specific activities)

SUMMARY OF LOCAL GOVERNMENT RESPONSE	
<p>Action 1: Traditional Owners determine how their rights and obligations are embedded into planning and management of the marine and coastal environment (refer to page 7)</p>	
<p><i>Position: support</i></p> <p>Action 1 is strongly supported by Councils.</p> <p>Key issues Traditional Owners face considerable funding constraints, with limited resources (people and funds). How will critical work like assessment / reassessment and protection of high priority / high risk cultural heritage sites be funded? The Strategy needs to address the significant investment required to support Traditional Owners to resource (lead, participate and partner) across all the activities identified. Without adequate resourcing achievement of these, and other activities listed in the Strategy, will become a significant constraint on Traditional Owner groups, relationships and outcomes being achieved.</p> <p>In the introductory sections “Traditional Owners will be supported to” Councils support the list of activities and offer an additional one. Councils strongly support the need to strengthen the relationship/partnership between Traditional Owners and marine and coastal land managers. Many of the activities listed in the strategy require a strong working partnership with Traditional Owners. Councils are seeking support from Traditional Owners to guide this partnership, to ensure Councils build relationships that foster respect and understanding of aspirations, acknowledging rights, culture, knowledge and practices on Country.</p> <p>General comments</p> <ul style="list-style-type: none"> On a case-by-case basis, a Registered Aboriginal Party (RAP) may choose to partner or provide advice to a local government, usually on a fee for service basis. There is no requirement for the RAP to provide comment or advice to management agencies, yet the Policy / Strategy requires (and Council support) greater Traditional Owner respect and recognition. This presents real and practical difficulties to any management agency trying to find a representative voice of Traditional Owners. In addition, a RAP may not have the resources and/or expertise to be able to respond to the vast number of planning and management decisions encompassed by this policy. This issue was also raised in the MAV-ABM Policy submission. 	
Activity	Comment
1.1	Does cultural mapping extend to the marine environment?
1.2	Councils request the strategy identify activities that guide how sites of Aboriginal value and heritage at risk from coastal processes will be strategically protected and managed, as this is beyond the resources of an individual council. This may be better addressed in other Actions, not Action 1 respecting it has been determined by Traditional Owners.

SUMMARY OF LOCAL GOVERNMENT RESPONSE	
<p>Action 2: Improve the condition and connectivity of habitats and respect and care for our marine and coastal areas (refer to page 11)</p>	
<p><i>Position: in principle support, with further clarification required.</i></p>	
<p>Key issues</p> <p>The introductory text suggests that "respect and care" of our marine and coastal environment will improve with increased community understanding. Improved respect, care and understanding can also be built through the controls, planning provisions, requirements on the way these habitats are protected / used / managed. It is not enough to hope that the improvements will come through understanding. Someone can understand and still not act any differently. The language in this section relating to community must directly address the need for a healthy marine and coastal environment, as it underpins everything else this Strategy sets out to achieve.</p> <p>Research and advice on specific impacts of climate change, such as changes in sea temperature and sediment movement, is required to better inform future planning and management of critical habitats.</p>	
<p>General comments</p> <p>It is unclear if reference to CMAs refers to Melbourne Water in the Port Phillip Bay context? Where it relates to strategic plans and responsibilities this clarification is important, particularly for the councils in Port Phillip Bay in understanding who is leading or partnering in this work.</p> <p>Suggestion: It would help if there was a way to show which terms are found in the definitions section, so you know to look.</p>	
Activity	Comment
2.1	How will this work be resourced in Port Phillip Bay where the current CMA doesn't cover estuaries and wetlands, Melbourne Water does. Suggest local government as a collaborator to this activity.
2.3	Strongly support this activity.
	Suggest this activity is broadened to protect existing habitat, and not just future migration of habitat.
	The length and complexity of language in this sentence makes it difficult to understand the intent. Who's plans and controls are being referred to? What linkages, what migration? What is the future climate change projection mapping referred to here? There is important context and simplification needed to make this activity comprehensible.
	The definition provided at the end of the Strategy document doesn't really help define the context of this activity.
	Suggest Parks Victoria also need to be part of the lead for this activity given it involves marine habitats.

SUMMARY OF LOCAL GOVERNMENT RESPONSE	
2.4	<p>Strongly support this activity, with suggested modifications.</p> <p>Does 'landowners' refer to private landowners or land owned by councils, or others?</p> <p>This overarching Action is about "condition and connectivity" – we want to incentivise landowners to do more than just allow migration. We want them to improve and protect condition and connectivity of important habitats. This activity is currently too narrow.</p> <p>Query why landowners are listed in the Activity, but not represented in the Lead/Collaborate section? This relates to our general comments above – that a broader range of stakeholders, beyond the traditional marine and coastal organisations needs to be represented in the Strategy.</p> <p>Suggest adding to 2nd dot point within the brackets – “and other sustainable practices” as not all situations will be suitable to nature-based adaptation but may still offer condition and connectivity improvements.</p>
2.5	<p>This activity, and other references to blue carbon (eg. 2.6) should include teal carbon</p> <p>Suggest Parks Victoria are a collaborator for this activity, given role in marine parks</p>
2.7	<p>Why just the Port Phillip Bay Environmental Management Plan? Are there EMPS for other bays and coastal areas?</p> <p>Suggest the Strategy 'Monitoring, Evaluation and Reporting Framework' reference and integrate the findings of the Port Phillip Bay Environmental Management Plan 5-yearly evaluation (2022-2023).</p>
2.8	<p>Not supported in current form</p> <p>This suite of actions describes the status quo. It needs to bring innovation and modern approaches to how we connect the community to the coast and build respect and care. Suggest this activity must include things like campaigns about our coastal values and treasures, social media, competitions, promotion, enforcement campaigns, etc. Education needs to move beyond school kids and community volunteers – educating the general public, professions, sectors, user groups, etc. This activity needs to be action based. It reads as 'encourage and support', which can be interpreted as optional.</p>
2.8 (a)	<p>This activity is too broad - lots of organisations, if they want to, can deliver something or nothing? Is this an activity or a request?</p> <p>This activity requires a clear lead to initiate and drive outcomes.</p>
2.8 (c)	<p>Encourage compliance? Respect and care, in some instances, might be driven by enforcement and compliance related initiatives. Direct language is critical.</p> <p>Promoting rules and regulations and enforce compliance where and when it's applicable.</p>
2.8 (e)	<p>In principle support, requires rewording to clarify importance of scientific rigour and fit for purpose.</p> <p>Good citizen science provides rigorous, valuable data. Growing the range of programs without any context of the need for good scientific rigour and fit for purpose programs leads to lots of money invested in programs that don't deliver valuable outputs.</p> <p>Suggest this activity references universities and cooperative research centres who also lead citizen science programs and are important research partners</p>
<p>Action 3: Support sustainable use and development of the marine and coastal environment (refer to page 15)</p>	
<p><i>Position: in principle support</i></p>	

SUMMARY OF LOCAL GOVERNMENT RESPONSE

Key issues

The description of this action outlines that coastal infrastructure is important for a range of reasons to a range of users, and that we need the appropriate frameworks to protect and enhance them. The activities listed go into detail regarding port infrastructure strategies, boating facilities strategy, a dredging review, and a number of other items that relate to these but also broader issues around investment frameworks, training and capacity too; however, it misses a range of other coastal infrastructure assets that are of great importance to coastal users and asset managers (particularly councils).

These assets include, but are not limited to, surf-clubs, toilet blocks and change rooms, coastal pathways, trails, walks and recreation reserves, historic sites etc that also require adaptation frameworks and investment. Councils are often key managers of these assets and are already dealing with having to relocate some of this infrastructure, or better adapt it - however there are not activities under this action that relate. The strategy must cover the full range of coastal assets and infrastructure, rather than those that relate to specific interest groups (ie. boat ramps).

Query why sustainable use and development (Action 3) comes before adapting to climate change (Action 4)? This is not in line with the Marine and Coastal Policy Planning and Decision Pathway that shows decisions are made with resilience and adaptation to climate change being considered before sustainable use and development. Suggest this order needs to be reconsidered to be consistent with the Policy.

Action 3 need to directly address the Marine and Coastal Policy 9.4 and 9.5 (p47) relating to “prevent, manage and minimise risk from the introduction and spread of marine pests, invasive species and disease” and “prevent, manage and minimise risk of pollutions and discharge from industry use and development in the marine environment”.

In relation to the introductory comments about access to use of tools and information, it is suggested users (often local government) will require training, guidance, and access to expertise to develop skills and capacity. Councils agree, and support this statement, but raise the following concern – frequently tools and guidelines get funded, but without any budget to support access, training and use. Suggestion: this action must reflect that these tools (and any future ones) must factor in the costs to provide training, guidance, etc, or they should not be funded. The investment is wasted if dissemination to the target user groups is not part of the project. It should be non-negotiable criteria for investment.

This Action is an opportunity to reinforce and planning and decision pathway, ensuring use and development adheres to the Policy objectives and the Act.

Concern several activities in Action 3 relate to pilot, evaluate, determine feasibility without reference to implementation within the 5-year Strategy? If an activity is determined to be feasible, or the pilot successful then it is reasonable to expect implementation or rollout to commence. Suggest activities in Action 3 being reconsidered and clarity provided about timeframes to implementation.

A much broader range of stakeholders needs to be engaged in this Action – identified as key collaborators to achieving sustainable use and development on the coast. Such as, development industry, tourism industry, owner builders, consulting industry, etc.

SUMMARY OF LOCAL GOVERNMENT RESPONSE	
<p>General comments</p> <p>In the first introductory paragraph, the sentence starting “To continue having these opportunities now and into the future.....” isn’t clear? Maintaining the health of the environments we rely on needs to be embedded when we plan. There are too many concepts being conveyed. Suggest, planning and managing the impacts of use and development on the coast must put the health (protection) of our marine and coastal environments. This is an opportunity to link back to the Planning and Decision Pathway (step 2) where intrinsic values, good and benefits of the marine and coastal environment are protected and enhanced.</p> <p>Query why the Action (and activities) relating to use and development does not reference the Siting and Design Guidelines or the Marine and Spatial Planning Framework? Linking the various guidelines and tools to the Strategy provides much greater clarity and direction for councils, and other coastal Crown land managers responsible for applying and implementing these tools.</p> <p>Query why the community are not identified as a key stakeholder in sustainable use and development. The interface for councils in development on the coast is the community. What initiatives are being driven through the strategy to improve awareness and understanding in the community of what is and is not sustainable use of the coast?</p>	
Activity	Comment
3.1	<p>This Activity should be expanded beyond environment/natural environment outcomes but also ecologically sustainable development outcomes e.g. renewable/low carbon materials for boating infrastructure, sustainable and low/no impact management practices.</p> <p>This list of activities should be restructured to align with the Policy Planning and Decision Pathway – the Traditional Owner dot point needs to be listed first, followed by optimising environmental (and ESD) outcomes, then climate adaptation, then existing plans. Another opportunity to link Strategy to the Policy. This suggestion applies to a lot of other activities throughout the Strategy.</p> <p>Query why this activity doesn’t reference Marine Spatial Planning? Wouldn’t a Recreational Boating Strategy be expected to be part of integrated and coordinated planning and management in the marine environment?</p> <p>Is the reference to “local place-based plans” (2nd dot point) referring to local government plans eg. CMMPs? If so, local government should be listed as a collaborator.</p> <p>Recommend local government should be a collaborator. Also, possibly CMAs for recreational boating on inland waters?</p>
3.2	<p>A local ports framework must consider the implications to local port and land managers such as: increased use of ramps, parking and increased maintenance costs, impact of increased boating on other land-based user groups (ie. increased traffic congestion, larger carparks and loss of coastal values). A local ports framework needs to drive adaptable spaces that can be used by other user groups outside of peak boating times (ie. smaller sealed parking and larger overflow open space areas, drop off zone, etc.)</p>

SUMMARY OF LOCAL GOVERNMENT RESPONSE	
3.3	<p>The timeline for the finalisation of the Victorian Ports Strategy for the commercial ports sector is 2022. This is prior to the planning benchmarks for sea level rise (2023), and completion of state-wide hazard maps (2024) and planning scheme amendments (2026). This will have significant implications to future boating and port adaptation options and associated impacts on adjoining Crown land and residential properties.</p> <p>The Ports Strategy needs to implement best practice environmental management, not just “aim” for it. This action is not supported if the intent it only to aim and manage. It needs to include protection and management, such as avoiding development of areas of environmental significance / high biodiversity values.</p> <p>How will a Victorian Ports Strategy will support Victoria’s transition to a zero-emission target? Strong economic drivers need to be balanced with consideration of fossil fuel industries such as new gas infrastructure, and how the Victorian Ports Strategy can assist in transitioning our economy away from fossil fuel industries. Local Governments are working with the State Government to reduce gas emissions on the demand side e.g. new developments, however, there appears to be insufficient drivers to transition away from fossil fuels on the supply side and associated gas industries within Victoria’s Ports.</p> <p>What is an adaptation pathway to a thriving future for the sector? The directive and output is not clear. What is the actual activity?</p>
3.4	<p>Consider implementation trials across three different coastal compartments rather than distinct organisations. Enable partnership and sharing learning, rather than further siloed work. Suggest this activity needs wider implementation or a rollout program within this five-year Strategy. Suggest this trial be highlighted like the other ‘case study’ breakout box in the Strategy.</p>
3.5	<p>The preparation of Coastal and Marine Management Plans should have clearer timeframes for their development and review. This activity (or Action 6) must provide guidance on funding avenues for implementation, as without adequate resourcing CMMPs will become outdated and ineffective in influencing investment priorities along the coast. The cost to fully resource CMMPs is beyond the financial capability of councils.</p> <p>Language is misleading – could be read that Coastal and Marine Management Plans only need to align with Traditional Owner needs. Suggest, new wording should include that development of Coastal and Marine Management Plans needs to be in accordance with the Coastal and Marine Management Plan Guidelines. These Guidelines needs to be referenced. They also need to be drafted for consultation with councils and Committees of Management and released as a matter of urgency.</p>
3.6	<p>In the space of 5 years can we implement the piloted system across other relevant areas? Why stop at evaluate? Query what is meant by “high use marine and coastal areas”? Recommend the activity considers low volume use areas with higher environment significance as well.</p>
3.?	<p>Collaboration should extend to Commonwealth Government as well as coastal land managers from other States. Expand on existing hubs such as Coast Adapt to create a centralised knowledge base.</p>
3.9	<p>Support: Councils welcome investment in training and capacity building to support consistent understanding and application of guidelines, processes, etc. It is important these initiatives recognise the variability of resources across councils to resource this.</p>
3.9 (b)	<p>Councils support this activity and welcome the opportunity to strengthen capacity to partner with traditional Owner groups</p>

SUMMARY OF LOCAL GOVERNMENT RESPONSE

Action 4: Adapt to impacts of climate change
(refer to page 19)

Position: in principle support, with concern

Councils welcome the establishment of coastal erosion advisory support. Erosion modelling is a rapidly developing science, and it is evident that there is a lack of available data, such as the source and movement of sediment, at the resolution required to model problematic sites. There is still too much reliance placed on hindcasting shoreline position to map erosion hotspots. Councils request involvement in the design of the erosion advice program, to ensure it meets the needs of councils and addresses the issues and site-based advice that is required. There is also opportunity for this advice to include direction of application of nature-based approaches or alternative solutions to hard engineering.

Action 4 must have clear, articulated alignment to the Adaptation Pathways in the Marine and Coastal Policy. This approach should be highlighted as a key management approach and informed by hazard maps at the resolution required for local planning where individual allotments can be identified. Development and adoption of a specific coastal hazard overlay should be considered. Nature-based coastal protection solutions need to feature more prominently in the Strategy, including use of economic and policy instruments to incentivise the approach to coastal protection.

The concept and relevance of Regional and Strategic Partnerships (RASPs) has little mention in the Strategy, despite being clearly identified in the Act and Policy as a key mechanism for delivery. Some activities identified in the strategy could be further explored or delivered through the establishment of a RASP, such as coordinating monitoring, sampling and analysis at the scale required. Application of RASPs would also be valuable tools for supporting integrated and coordinated strategic planning, such as partnering with neighbouring management agencies to undertake coastal and marine management planning and adaptation strategies. There need to be greater mention and application of RASPs in the Strategy.

Key issues

The activities set out important plans, projections, communications, networks, reviews, maps. These are all useful tools to support councils in their planning and capability. We welcome the opportunity to work closely with DELWP on these activities. Councils welcome the establish of the coastal erosion advice in the Strategy. Councils require advice, guidance and funding on site specific erosion issues, and direction on determining appropriate soft engineering and nature-based erosion solutions; and guidance on consultancy practices who have successfully designed and delivered successful interventions.

This Action appears to focus on longer term tools and supports for adapting to climate change. There appears to be few initiatives that support coastal land managers to address the immediate shorter-term issues facing our coast from climate change. Feedback from councils through the Policy consultation and subsequent strategy engagement highlighted the significant issue, risk and costs to councils managing the immediate and impending impacts. It is assumed that perhaps this guidance and support to manage current, short-term impacts of climate change might be embedded in the Victoria’s Resilient Coast Program? Further commentary on this program (or the other relevant activities) would be useful in the introduction to address these concerns.

Reference to the Planning and Decision pathway is integral to this action

SUMMARY OF LOCAL GOVERNMENT RESPONSE

General comments

Suggest the opening paragraph for the introduction should be paragraph #3. The Action is adapting to climate change – what are the changes to our coast and why do we need to adapt the way we live, work and use the coast, etc. Suggest a shortened version of change and resilience provided at the end of the introduction for context, but not critical.

Introduction needs to include reference to impacts of coastal climate change on sites of cultural heritage significance and sites of high environmental value.

The Marine and Coastal Policy states the 2008 0.8m sea level rise benchmarks would be updated as part of the Marine and Coastal Strategy. The Strategy must resolve the potential for conflicting advice – referring back to the Coastal Policy for updated sea level rise benchmarks. The draft Strategy ‘frequently asked questions’ currently states ‘Revised modelling is underway and will be incorporated into the Policy.

Suggest reference to ‘normalising conversation on climate change’ be broadened to normalising our response to climate change impacts to focus on the positive outcomes from mitigating the risks to people, adapting our assets and protecting ecosystems’.

Question how Action 4 supports and complements the Climate Change Strategy 2021? The Strategy has little to no mention of marine or coast, or climate impacts on the coast? The single mention of coast in that strategy is about the opportunity for blue carbon. What are the actual complementing activities between the two strategies? It would be valuable for councils if there were clear links, and our response the Climate Change Strategy pointed out the lack of mention of the marine and coastal environment as part of the State’s climate change agenda.

Activity	Comment
4.1	<p>Communication about climate change must be a state-regional-local partnership. The role of the State in leading broader messaging around climate change impacts on the coast and adaption is a critical component of this activity, and critical to supporting regional / local communications. This is not an easy conversation, nor will it be necessarily well received. Needs visible state leadership that enables locally led communications when and where that’s feasible/desirable.</p> <p>This activity should also draw on the Marine and Coastal Policy expectations of ‘beneficiary pays’ and no obligation for the State and local governments to manage ‘crown land or coastal processes to the primary purpose of protecting private properties’.</p> <p>MAV is not the appropriate lead. Local governments are important as collaborators. As a member-based association the MAV will engage in initiatives such as this at the request of its membership (councils), or through direct engagement from DELWP.</p>
4.2	<p>Recommend that existing platforms for knowledge sharing and networking be used, rather than wasting valuable dollars starting from scratch eg. Coast Adapt</p> <p>MAV is not the appropriate lead. Local governments are important as collaborators.</p>
4.3	<p>Query why the activity is just to review? To be effective, the outcome needs to be that planning benchmarks are updated because of the review.</p>

SUMMARY OF LOCAL GOVERNMENT RESPONSE	
	<p>Clarification is needed on the expected timing to update (rather than just review) the decade old benchmark and if the figure will be a consistent statutory control across the State or varying heights related to varying assumptions at individual coastal locations.</p> <p><u>Request:</u> A timely or automated planning mechanism is sought to amend sea level benchmarks across all planning schemes based on the best available and latest science.</p>
4.4	<p><u>Request:</u> Fast track state-wide coastal hazard mapping to enable councils to update planning controls to manage risks around sea level rise and coastal surge. Clarification required – what scale / resolution is state-wide mapping, and how does it differ from the existing mapping undertaken through Future Coasts Coastal Hazard Assessments? Is this different? What is the application to public and/or private land?</p> <p>Propose implementing coastal hazard maps into statewide planning controls at the same time, similar to statewide introduction of the Bushfire Management Overlay. This will ensure these hazards are captured as part of planning considerations for future growth and development in coastal areas.</p>
4.5	<p>Clarification required – “collate” give the impression of an in-house data gathering exercise. Strongly recommend the intent of this activities is made clearer, eg. To collate and disseminate ...</p> <p>Councils request a broader explanation on how these climate change indicators and stressors will be investigated, monitored and responded to at a strategic level as required under the Plan. This would allow Councils to consider the roles that they can play through local planning, resilience strategies and development work in responding to mitigating against these risks.</p>
4.6	<p>The intent of this activity is not clear. How are gaps in knowledge and research needs linked to climate change projections? Would we identify research needs and address them, and are the research needs linked to the knowledge gaps or different? What does gaps in knowledge of Traditional Owner knowledge mean? Doesn’t make sense? Gaps in knowledge and identification of research needs could apply across the whole Strategy, so it this specifically about coastal adaption needs, coastal hazard impact needs? It’s not clear.</p>
4.7	<p>Councils support this activity.</p> <p>Query the clarity of language “enable timely”. Does this mean just provide the data or more? Recommend stronger, clearer language here.</p> <p>Encourage that where feasible, planning scheme amendments should be Ministerial amendments, and be combined with other municipalities facing risks and impacts from sea level rise. Request Ministerial Amendments and fast tracked into the planning scheme while data is still current.</p>
4.8	<p>Requires stronger link to Policy and how this will be achieved in consideration of the Planning and Decision Pathway.</p> <p>Ambiguous – what is the reference to “consistent with state policy and strategy”? Which state policy and strategy are being referred to here?</p>
4.9	<p>This activity focuses on the needs of the agencies providing the advice. To be affective in the provision of advice, this activity must meet the need of the end user – the organisations seeking the advice. There needs to be mention of how the process will include understanding what advice is needed (ie. From local government), and well as building capacity in local government to understand and apply the advice. Difficult to provide advice if you're not engaging with the people seeking that advice? Recommend local government and committees of management are included as collaborators.</p> <p>What requirement (legal?) do organisations have to apply / abide by the advice? Is the advice only provided on request, or provided as a directive? What support is there to apply the advice using the expertise generated through this erosion support role?</p>

SUMMARY OF LOCAL GOVERNMENT RESPONSE	
4.10	<p>This appears to be the only activity relating to chapter 7 of the policy (emergency response and preparedness). Suggest Action 6 needs to incorporate a broader range of activities to support emergency response and preparedness relating to marine and coast – or provide commentary as to where this is possibly covering in other strategies?</p> <p>Support discussion that emerged during strategy engagement processes – ensuring local planning considers beaches as places of last resort in high-risk areas (coastal hazard, bushfire).</p>
4.11	<p>This activity must reference the development of RASP Guidelines (and a timeframe for them being prepared/published). Query if it is suitable to name the Port Phillip Bay pilot RASP given the implementation has stalled and is without a lead organisation.</p>
4.12	Support.
4.13	Support. Councils strongly support this initiative and are critical collaborators in the design to ensure it is fit for purpose and investment can be maximised.
Text box	<p>Climate conversation topics: suggest reference to how our coast and communities have adapted to change - the history of change. Change isn't new, the rate of change is. The dot points currently are mostly future based. Climate conversation is about change over time, looking back and looking forward. This will also help engage our communities, bring into account their stories of change on the coast.</p>
<p>Action 5: Implement integrated planning of the marine environment <i>(refer to page 25)</i></p>	
<p><i>Position: support</i></p>	
<p>Key issues Councils welcome the opportunity to work with stakeholder in marine spatial planning where relevant to our role as coastal Crown land managers. Engaging with local government to clarify the role of Councils in the marine space would be valuable, as it continues to be a subject of mixed views and conflicting information.</p>	
<p>General comments The term 'responsible bodies' doesn't seem like the right language, and it's not used elsewhere to describe responsibility / stakeholders. Suggest the introduction starts at sentence #2. It immediately describes the Action. The first sentence could be worded differently and integrated further into the introduction. The language needs to reflect the constructive, challenging conversations required to find the balance between needs and uses.</p>	
<p>Action 6: Identifying resource needs and funding for sustainable marine and coastal management <i>(refer to page 29)</i></p>	
<p><i>Position: in principle support, with further clarification required.</i></p>	
<p>Key issues Critical that funding needs take into consideration the varying financial capability across different councils, ensuring regional coastal councils aren't left having to compete with metropolitan coastal areas with large populations, higher rate base.</p>	

SUMMARY OF LOCAL GOVERNMENT RESPONSE

Councils would like to understand the proposed dollar investment by the State into Action 6 – investing in assessment, modelling, planning, etc. Councils request transparent reporting and justification as to the value of this investment balanced with co-investment into critical issues facing our coast and coastal communities now.

Specific activities associated with boating infrastructure should require a co-contribution from Better Boating Victoria, as part of a “whole of marine and coast” approach.

Suggest the action title is ambiguous. “Identify resource needs” is clear. The reference to identify “funding” – does that mean identifying funding sources or does it mean identify the funds needed (that we don’t yet have)?

General comments

The wording in this introduction has clear alignment and reference back to the Policy. We welcome this approach being applied to each of the other Actions ie. what are the links and references back to the Policy that drove this action/activity?

This introduction is the first time the concept of this strategy being 1 of 3 is conveyed as part of the Action context. We welcome this approach being applied to each of the other Actions, to help understand the point in time for these activities – and foundational activities for future strategies, ongoing, pilots or reviews to ascertain activities for future strategies.

Activity	Comment
6.1	Does this activity build on existing work such as Financing the Coast as there appears to be duplication in what this activity is proposing to do? We query why further investment is needed in this area? Suggest land managers need to be collaborators to this action – local government, committees of management, Parks Victoria
6.2	Query language – can you “build” adaptation? Suggest the activity is to collate funding needs for the purposes of adaptation and resilience. Request that the information collated on state-wide funding needs be made available to coastal managers. In addition, the information be linked to state-wide coastal hazard vulnerability assessments, identifying the most at-risk areas to prioritise investment. <i>Typo – correct “Marine and Coastal Management Plans” to Coastal and Marine Management Plans.</i>
6.3	Suggesting using holistic methodology that considers impact on regions/compartments and include safeguards so that such a system cannot be used to ‘pay off’ the impacts of irreversible environmental damage. Councils would welcome further information on how this information would be applied in local government context.
6.4	Suggest funding options that: <ul style="list-style-type: none"> - model the needs of different marine and coastal managers (and coastal compartments) - consider the varying financial capability across different councils, ensuring regional coastal councils aren’t having to compete with metro coastal areas with large populations, higher rate base. - support Traditional Owner rights and aspirations (include TOs as collaborators). - support effective implementation / leading practice in line with guidelines such as Siting and Design, and new tools and guides identified in this Strategy.

SUMMARY OF LOCAL GOVERNMENT RESPONSE	
	Requires much greater definition and prescriptive language to be an effective activity. Include a checklist, assessment against Policy, Siting and Design guidelines, examples.
6.5	This activity is required however it needs a greater priority. Update from 2022-2025 to 2022-2023.
6.6	Suggest the investment plan is for coastal protection assets including nature based. The language is ambiguous, as an investment plan primarily for nature-based asset protection. Investment plan needs to protect cultural heritage and Traditional Owner values on the coast (additional dot point).
Implementing and evaluating the Strategy <i>(refer to page 33)</i>	
<i>Position: in principle support, with further development required</i>	
<p>Key issues</p> <p>Councils acknowledge a monitoring, evaluation and reporting framework will be prepared for the final Strategy. The current table does not adequately set out how the Strategy will be monitored and evaluated, including the expectations on stakeholders to contribute to this. We welcome any opportunity to provide input to the final framework, particularly given the large number of activities that have local government listed as the lead/collaborator.</p> <p>(2nd paragraph) – suggests that the Strategy is a blueprint for future investment. The Marine and Coastal Act 2018 requires a Strategy, not a blueprint. The Strategy must outline actions to achieve the Policy. There needs to be much clearer, visible alignment to the Policy to support the development of business cases locally, regionally and statewide – including blueprints for investment.</p> <p>General comments</p> <p>DELWP and other state agencies are listed as lead for many of the Strategy activities. Councils find it difficult to keep track and stay connected to the various projects and activities, whether that are started, being drafted, underway or completed? Many have a direct impact on local government or would benefit from local government engagement. Suggest that as part of the implementation and evaluation there is visibility of the progress of actions/activities such as via the website or an annual presentation and update to stakeholders. Request this activity be included as part of implementation and evaluation.</p> <p>(1st paragraph) – agree that collaboration is needed to deliver this Strategy. Suggest that a much broader representation of stakeholders needs to be visible in the Strategy, to facilitate engagement, collaboration, co-investment, etc. If organisations / agencies aren't visibly integrated into the Strategy, it's a lot harder to engage down the track.</p> <p>(2nd paragraph) – possible typo. "While the Strategy includes some actions.....". Suggest the sentence is "The Strategy includes...."</p>	
Activity	Comment
Activity 1	Unsure how this statement is an activity? Is the intention to count the number of uses of the Strategy to inform business cases?

SUMMARY OF LOCAL GOVERNMENT RESPONSE	
Activity 2	<p>Suggestion to reword as:</p> <ul style="list-style-type: none"> - tracking implementation of this Strategy against the 15yr intended outcomes of the strategy - evaluating the effectiveness of the activities in achieving each Action as a means of informing the next Strategy <p>Unsure what the meaning and intent of the first dot point is? Typo in second dot point – “inutes” instead of inputs.</p>
Other comments	
<p>Appendix A: wording of opening paragraph a bit clunky. Suggest: The Act establishes the guiding principles and objectives for planning and managing the state’s marine and coastal environment. A Marine and Coastal Policy was developed and came into effect on 6 March 2020. The Policy outlines the direction for planning, management and sustainable use of the marine and coastal environment for the next 15 years.</p> <p>Appendix A (Figure 2): suggest adding the years to the three strategy timeframes.</p> <p>Appendix C: the matrix is helpful in understanding the links. There would be value describing these links in each of the Action preambles.</p> <p>Appendix D (habitat migration): suggest a plain English definition is needed here as the description doesn’t simply the meaning of habitat migration for the reader.</p> <p>Appendix D (Traditional Owner group): doesn’t provide a definition, directs you to another Act to find the definition. Is there a means of providing the definition here, given the significant role Traditional Owners have in the Strategy and the number of actions and activities that involve or acknowledge Traditional Owners? It is critical that this definition is understood.</p>	

Background information

About the Municipal Association of Victoria

The MAV is the peak representative and advocacy body for Victoria's 79 councils. The MAV was formed in 1879 and the Municipal Association Act 1907 appointed the MAV the official voice of local government in Victoria.

Today, the MAV is a driving and influential force behind a strong and strategically positioned local government sector. Our role is to represent and advocate local government interests; raise the sector's profile; ensure its long-term security; facilitate effective networks; support councillors; and provide policy and strategic advice, capacity building programs, and insurance services to councils.

About the Association of Bayside Municipalities

The ABM represents the ten councils with frontage to Port Phillip Bay. Together these councils represent 1.2M people (22 percent of Victoria's population). The ABM councils play an active and integral role in the management and protection the environmental, social and economic values of Port Phillip Bay.

The ABM has a proud history of investing in knowledge sharing, partnerships and on ground projects to inform planning and management of the marine and coastal environment of Port Phillip Bay, while also building capability and networks across councils. In recent times the ABM's focus has been coastal climate adaptation, working towards a whole-of-bay approach to planning for and responding to the impacts of climate change on the coast.

The role of councils in the marine and coastal environment

Councils can have a variety of important roles that relate to the environmental management of the Victorian coastline and bays, including:

- appointed Committee of Management under the *Crown Land (Reserves) Act 1978*
- Planning Authority and/or Responsible Authority under the Planning and Environment Act 1987 (noting that Victorian government ministers, departments and authorities also regularly perform these statutory roles) as a strategic land use planning authority
- Service provider to Parks Victoria or other Committees of Management
- Asset manager

As the appointed Committee of Management local government performs the following functions:

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| • governance | • facilities management |
| • maintenance | • natural resource management |
| • building/site administration | • beach management |
| • building/infrastructure management | • festivals and event administration |

Councils consider primary responsibility for the marine environment, and health of the Victoria's coast and bays to the high-water mark, to be the responsibility of the State Government. That said, councils recognise that their actions can impact the health of the marine and coastal environment through management of foreshores, and stormwater drainage responsibilities. This includes all councils within a coastal catchment, not just those that directly interface the coast or bays.