



FRIENDS OF LORNE INC A0023195T

Friends Of Lorne Submission to the Great Ocean Road Coast and Parks Authority

15 December 2019

Executive Summary:

1. It is a mistake for GORCPA to attempt to construct the most 'representative' model for community input to GORCPA by way of committees. No model will be ever be sufficiently satisfactory. Instead, separate structures should be set up to for different functions i.e., for feeding back information about GORCPA activities versus gathering input and ideas from communities.
2. In the early years, we envisage two type of interactions with communities: Authority Activity Briefings and (more intense) Action Agenda Workshops.
3. GORCPA should design a comprehensive monitoring and evaluation plan – to measure its effectiveness in key areas such as marine and coastal protection, erosion control, traffic management etc. GORCPA should publicly report against KPIs (key performance indicators) in these areas.
4. Rather than present a small set of particular options for financing, Friends of Lorne would prefer to see that GORCPA produces a more comprehensive report of its finance sources and supplementary funding options.
5. Much (seemingly) remains unclear in terms of many GORCPA responsibilities and intended ways of working with the existing authorities. Friends of Lorne is able and willing to help shape GORCPA's role in the region, building on our long history of our work with local government. We welcome the opportunity.

Introducing Friends of Lorne (FoL)

Friends of Lorne (formerly the *Lorne Planning & Preservation League*) was established in 1966 to encourage and contribute to:

- the planning and development of the environment within Lorne and its environs consistent with the need for preservation of flora and fauna of the district
- the planning, development and maintenance of community services and activities within Lorne and its environs consistent with the balanced needs of permanent residents, non-permanent residents, campers and tourists

The organisation's chief legacy is reflected in the elements of the Surf Coast Shire's Lorne Strategy Plan (and the Lorne Neighbourhood Overlay) which preserve Lorne's much loved forest-to-the-sea natural beauty.

FoL membership taps into a range of diverse and highly specialised sets of skills and knowledge (local, national and international). We are keen to play an active role in the development of the immediate and long-term action plans for the GOR Region.

This submission is divided into two parts. Part 1 addresses the high level intentions in the Action Plan. Part 2 specifically answers the questions in the current GORCPA survey on community involvement and financing.

PART 1 Comments on the Action Plan Overall

The Action Plan gives primacy to protecting coastal and marine environments for future generations over commercial interests. We agree that where conflicts of interest occur, environmental matters should be favoured. We note however that other interpretations of the document are possible,¹ and these are a source of confusion. The Action Plan represents an opportunity to manage the region in ways that meet environmental criteria and sensible commercial interests. We hope its potential is realised.

Environmental protection

We note that the new body, the Great Ocean Road Coast and Parks Authority, will control all Crown lands and Council parks, marine waters and most of the Great Otway National Park, but subcontract management of these to Parks Victoria. The new Authority will be responsible for roles currently carried out by the Great Ocean Road Coast Committee (GORCC), the Surf Coast Shire and Parks Victoria.

- We accept that native flora and fauna should benefit from co-ordinated management, and that threats posed by plant and animal pests may be easier to address.
- We remain concerned that the conservation value of parks and reserves will be diluted by pursuit of inappropriate commercial objectives.
- We are concerned about funding. GORCC is funded from tourist revenue, the Council's ability to raise funds is limited by a cap, and Parks Victoria is seriously under-funded. We believe the Authority should retain revenues from tourism, but cannot be solely dependent upon it. Local residents and owners should not be required to subsidise the activities of tourists
- The Action Plan acknowledges that advancing tourism and protecting the environment can be mutually exclusive objectives, but has little to say about what 'sustainable tourism' might look like. A capacity analysis is foreshadowed as part of a visitation strategy. We

¹ For example, Action 4 contains the sentence *The Authority's primary purpose is to protect and manage visitation of the Great Ocean Road Coast and Parks*. This can be read as *The Authority's primary purpose is to protect, and manage, visitation of the Great Ocean Road Coast and Parks* or as *The Authority's primary purpose is to protect, and manage visitation of, the Great Ocean Road Coast and Parks*:

accept that restricted access may be needed in the future as well as new ways of raising revenue from tourism.

- Climate change, the greatest long-term threat to both tourism and the environment, is not adequately dealt with in the Action Plan, nor are climate specialists adequately represented in the foreshadowed Authority or in the Advisory Group. The State has ambitious emissions targets, but tourism is a major and increasing source of carbon emissions.²

Regional planning

A Great Ocean Road Strategic Framework Plan is proposed to guide municipal and other authorities.

- We are pleased to see that the plan will be long-term (50 years) with a review every 10 years, but it is unclear to us who is charged with developing the plan. Mitigation of climate change should be front of mind.
- Although we welcome the assurance that this plan will be developed with ‘community participation’, dealing with the plethora of agencies, each with an ‘oar’ in the management of the region,³ and plans on offer,⁴ is very time and energy consuming for volunteer groups.
- We suggest that future consultations should modify the current procedure. The ‘show and tell’ format (followed by ‘voting’ with sticky notes) does not enable participants to listen, learn from, and be corrected by, each other’s thinking. We suggest the consultations should instead open with a public address, followed by questions.
- Some of our members are concerned that the interests of the small towns along the Great Ocean Road are compromised by the differing interests of more populous and urban areas. The inclusion of Torquay (from Point Impossible) means this remains a concern. The requirement that decisions are made with a whole of region perspective may allay some concerns.
- It is important that the issues and characteristics of the various different segments of the GOR, (e.g., their geographic aspects, economic situation and topographical form) is understood
- The implications of the proposed Distinctive Area (from Torquay to Jan Juc) to be called the ‘Surf Coast’ are not clear to us. We would favour a declaration if it established a boundary to suburban development on the northern boundary of the region controlled by the Great Ocean Road Coast and Parks Authority.

Town planning and services

The Great Ocean Road Standing Advisory Committee, part of the Action Plan, has been established. The Advisory Committee advises the various ministers associated with the Department of

² The Carbon Footprint of Global Tourism. *Nature Climate Change* 8 (2018): 522–28.

³ Four sections of the Department of Environment Land Water & Planning, Victorian & Marine Coastal Council, Victorian Environmental Assessment Council, Corangamite Catchment Management Authority, Parks Victoria, Municipal Councils, new Great Ocean Road Coastal and Parks Authority, new Great Ocean Road Advisory Committee and others

⁴ Lorne structure plan (Surfcoast), several GORCC ‘engagements’, GOR action plan, Forest Reform Project – Grampians & Barwon South West, Fairhaven to Apollo Bay Trail Study, Barwon South West Renewable Energy Roadmap and others

Environment, Land, Water and Planning (DELWP). It can also advise other bodies on request. One of its roles is to streamline planning approvals, but it is not clear to us how this will work.

Most services, it appears, will still be the responsibility of the Surf Coast Shire.

- Until more detail emerges, it is hard to comment on planning and services, but there does seem to be a possibility that rather than streamlining planning deliberations, the Advisory Committee will represent an additional administrative process.
- Friends of Lorne want Lorne to remain a place for residents, non-residents and tourists to see, or live close to, the natural world. Victorians, in general, want the same thing. Surveys indicate that Victorians value the character of coastal towns, and see that character as under threat from increasing populations, suburbanisation, expansion of town boundaries, and high rise dwellings.⁵ There are many planning challenges here
- One challenge is to provide an adequate stock of affordable accommodation for essential services, casual workers and permanent residents
- Road access is another challenge. The Action Plan indicates that north-south access routes from the Princes Highway to towns will be part of a transport strategy. Friends of Lorne agrees that NS routes are a vital component. Even in the short term parts of the Great Ocean Road are at risk of closure resulting from coastal erosion, landslides and bushfires. All of these risks are increasing.
- Some members of Friends of Lorne have expressed concern that the influence of residents and non-resident owners on town management will be diluted by the Action Plan. It follows that this could be a consequence of some responsibilities of the Surf Coast Shire, in which residents and owners have a say as voters, being transferred elsewhere.

PART 2 Options for Community Involvement & the Financing of GORCPA

Survey Question 3 FoL wish to take part in *all options* listed on the survey. That is, in long-term planning; environmental conservation and rehabilitation projects and/or priorities; location, design and maintenance of facilities, assets and infrastructure; annual budget process; and visitor management,

We note that the degree to which normal town planning functions will remain with the Shire, and from there, which planning functions will be taken by the Authority, is not clear. For example, will the Lorne Strategy Plan and the Lorne Neighbourhood Overlay be the responsibility of the Council or of the new Authority? Will the Authority be an accessible mediator between Vic Roads and the community in regard to the dual role of Mountjoy Parade as a the retail street and a local road as well as the route of the GOR? How will GORCPA balance through-put and the more static role as the heart of the town and its beach? Can the

⁵ Coastal & Marine Environment Community Attitudes & Behaviour (Wave Four) Report 2012

walking tracks of the Parks in and around Lorne, be better maintained in order to enhance the “lived” experience of Lorne?

We have four priority interests:

- The protection and enhancement of the identity and special character of Lorne as a settlement nestles in the amphitheatre of the Otways at the mouth of the Erskine River, shielded from southern winds and dominated by the extensive tree canopy.
- The protection, enhancement and meaningful experience of the natural environment of the Otway Ranges that envelope the settlement
- Finding ways to better utilise the built resources of the town to aid in ensuring long term social and economic sustainability of the town during the slow off-holiday-season from Easter to Melbourne Cup. Our preference is to build Lorne as a place to stay to experience the broader geographic, environmental and lifestyle dimensions afforded by the GOR REGION, a stay, linger and enjoy the GOR and Otways, utilising the existing accommodation and hospitality support resources of the town and the area.
- Better-informed planning using more comprehensive local data and mathematical models (dynamic simulation models) to track population trends, track marine and forest conservation, monitor traffic trends and visitation (etc) and identify important interactions and thresholds that might indicate the need to amend GORCPA policy and practice.

The Authority’s approach to the order of priority for place-making along the GOR is not yet clear. Will it be to create a singular theme and expression that relegates the identity and special character various communities and special ecological zones to being sub parts of an overarching single experience for the interstate and international tourists? Or, will it be as a series of character and lifestyle areas/communities, linked by the common frontage to the local part of the Southern Ocean and being a sea-side face of the Otway Ranges? The latter approach, which is what the FoL believe is the right approach, would also recognise that for many residents and holiday home owners the length of the GOR is rarely travelled as day to day travel patterns include many “north/south” roads into the part of GOR in which they live or frequent. In this way it is a “segmented” overall place.

For example the Lorne to Deans Marsh/Colac link is more regularly used for many than the Lorne to Torquay/Geelong coastal route. We know this to be so for many in the Apollo Bay area as their preferred route to Geelong/Melbourne is through Forest. Experientially the Cape Otway/Johanna Beach/Lavers Hill segment is different from the Eastern View to Apollo Bay segment, and again from the Shipwreck Coast/Twelve Apostles segments. We see the major causes for these differences being weather, topography and ecology. The windswept areas have distinctly different plant and undergrowth regimes, and topography and soil conditions have influenced where post European settlement has opened up the forests for agriculture.

Together, these natural environment features can be used to tell an Indigenous- European history of this part of the planet.

We are very interested in the how the GORCP Authority can assist Lorne in attracting more visitors who stay in town in the shoulder and off seasons which of course is the summer for the northern hemisphere.

Survey Question 4 Alternative options for community involvement

Our response fits under “Other” and we offer four ideas or principles:

1 Separate structures for different functions

It is a mistake for GORCPA to attempt to construct the most ‘representative’ model for community input to GORCPA by way of committees. No model will be ever be sufficiently satisfactory. Instead, separate structures should be set up to for different functions. First, *to hear about what GORCPA is doing and answer questions*, GORCPA should hold a public forum in Lorne 2-3 times a year. This should be a 90 minute meeting large group (no small group activities). Second, *to express their own views and concerns to GORCPA*, every group and individual should be able to make direct representations to GORCPA.

2 Appreciate intra-regional differences

There will be times when sub regional plans or representations are required for data gathering and consultation. Since there are only two State electorates, Polwarth and South-West, it is the Municipal structure and each Shire’s established divisions that should drive the ordering of the community interfacing.

For Surf Coast Shire this means the Lorne Ward, the Anglesea Ward and maybe the Torquay Ward. For Colac Otways Shire it could be the Apollo Bay area and the Otways as that shire does not have wards. For Corangamite it is at least the Coastal Ward and maybe South West Ward, and for Moyne, with no wards, it might be the Nullawarre roads sub-district. Whatever the final structure might be we believe it should have two characteristics: reflect how the local government structures work and, secondly, encompass the coastline and the hinterlands.

So four areas emerge:

The east facing part of the GOR and Otway Ranges from Apollo Bay to south of Torquay.

The Cape Otway and over to the southern coast

The Twelve Apostles area, and

West of Port Campbell.

Or possibly

Surf Coast Shire

Colac Otway Shire

Corangamite Shire and beyond

3. Work with communities to achieve enjoyment of the natural environment

GORCPA should work in partnership with communities. Protection and enhancement of the environment should be foremost in all decisions. The focus on “development” should be on utilising the summer and holiday-based built environment resources to foster all year round enjoyment of the natural environment rather than introduced “entrepreneur introduced ‘entertainment’ projects”.

4. Community feedback is not a substitute for formal performance evaluation.

GORCPA should design a comprehensive monitoring and evaluation plan – to measure its effectiveness in key areas such as marine and coastal protection, erosion control, traffic management etc. GORCPA should publicly report against KPIs (key performance indicators) in these areas. The KPIs should be drawn up in consultation with evaluation research experts and with feedback/involvement of the community (see “workshops” below)

In the early years we see *two type of interactions*: Authority Activity Briefings and, Action Agenda Workshops. The first, Authority Activity Briefings would be initially on a semi annual basis and after, say 3 years, be annually. The first would be a form of progress and next steps reporting to the Community Groups and their communities. They could be for more than one Community Group, perhaps in the three Shire groupings. Their form would be predominately one flow from the Authority to the Community Groups.

The Action Agenda Workshops again would be semi-annually initially, and then annually, feeding into the Authority’s annual works planning timetable. We see them to be a three step process: Briefing of Community Groups in Shire macro groups, workshoping at the Community Group level, and, Reporting into the Authority at the Shire macro groups again. The first step would be to inform the Community Group members of the agenda, the perceived issues, any parameters, and so on. The workshops would be for each Community Group to develop its own responses to the issues, parameters, propositions and requests from the Authority. The Reporting into the Authority could also be at the Shire level and be a workshop to generate a common position. We would see the briefing sessions being of between 2 to 3 hours, The Workshops could be a day or an day and half, and the Reporting Back sessions when an overall, common or segmental outcome would be reached could be of a day’s duration in the formative years. They would involve a subgroup from each Community Group.

Survey Questions 6 and 7. Funding options

Rather than present limited particular options for community consultation, FoL would prefer to see that GORCPA produces a more comprehensive report of its finance sources and supplementary funding options.

It is our understanding that many of the responsibilities of the new Authority will be transferred from existing government departments or agencies, such as Parks Victoria, local Shires, Planning Victoria, and Vic Roads. If this is so, then these roles and responsibilities should not be a full extra cost to the State’s Treasury. Positions and funds should be transferred along with the responsibilities. When it comes to projects, such as enhanced quality of the GOR, or new visitor centres or parking areas, why would not State or Federal programmes be approached on the basis that they are for tourists and not state based residents and visitors?

As for integrated strategic planning, all ratepayers pay for the strategic and project planning services of the Shire and its interactions with the State through property rates, so why would there not be a transfer of positions and/or funds from the Shires to the Authority? Similarly, if the

Authority is to take on strategic planning and other responsibilities from Parks Victoria, why should there not be a transfer of positions and/or funds from one to the other?

As to the various suggestions of possible income one that is missing is a transfer of recreation and open space funding from each of the Shires in exchange for the various open space and recreation resources and opportunities provided for, and maintained by the various Committees of Coastal Management. (Various members of FoL who have served on GORCC or its predecessor, Lorne Foreshore Committee, have expressed surprise that this does not occur although it did for one year recently at the rate of one of three years at \$120,000 a year!). In Lorne, only the children's playgrounds, a skateboard rink, and the village green are maintained and managed by GORCC, along with the public toilets. (In CBD municipalities, such as Port Phillip, the beach front areas and promenades and the beaches themselves are maintained by the Council).

As to the suggested income streams: An overall comment is that since so much of the year round hospitality and accommodation trade is from visitors of various kinds and duration in the area, will not the cumulative effect be a disincentive to come to the GOR, for day trips and by intra state residents?

Parking lot fees: No. How does one distinguish between locals, their guests, and kids and grandkids of locals?

V.I.Ps: No. How does one determine who has come on the GOR and who has come in to the GOR coastline on a lateral road, such as Deans Marsh Road and similar into Skene's Creek and Apollo Bay area, and similar further along the GOR? What would be the net income after amortising capital costs of screening equipment and absorbing staff costs for checking and collecting?

T.O.Ls Maybe. These would seem a reasonable set of charges with the addition of a per passenger charge for all the tour busses.

Commercial Opportunities: FoL would be concerned if these types of projects became the source of operating funds, as they then become generated for revenue rather than being the best way to satisfy a need. Their criteria for success are also often developer profit driven, rather than sustained community economic success, as shown by the failure of the time share scheme at the Cumberland in Lorne, and the investor scheme at Erskine House. Further, any capital gain belongs to the PPP developer or the on-sold "owners", and is not a growth in Public assets that can be used as equity for other community projects.

In the end the question we would ask is why should there be any extra charges, and if so, why not in all coastal and tourist areas of the State? One option not broached is the European and USA pattern of room taxes/bed taxes.

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