

Response from Friends of Lorne to Great Ocean Road Action Plan

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

General comment

FoL interprets the Action Plan as giving 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. Overall we believe that 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 a new body, the Great Ocean Road Coast and Parks Authority, will control all Crown lands and Council parks, State 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 Coastal Council (GORCC), the Surf Coast Shire and Parks Victoria. Legislation to establish the Authority is pending.

- 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 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 deal with in the Action Plan, nor are climate specialists adequately represented in the foreshadowed Authority or in the Advisory Group. The State has

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.*

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’, we point out that dealing with the plethora of agencies with an oar in management of part 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 past procedure. The ‘show and tell’ format does not enable participants to learn from, and be corrected by, each other’s thinking. We suggest the consultations should open with a public address, followed by questions, and finally the informal show and tell currently used in most community consultations.
- 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.
- 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 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. The Advisory Committee will report annually to Parliament.

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.

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

- 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 if we are to balance the needs of permanent residents, non-permanent residents, campers and tourists.
- One challenge is to provide an adequate stock of affordable accommodation for all user groups
- 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.

Mary Lush

Secretary, Friends of Lorne

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