

Guidelines for an Environmental Protection Policy on the Coastal Zone.

**Working draft and preliminary working
draft : summary of submissions.**

**Environmental Protection Authority,
Perth, Western Australia**

**Bulletin 33
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ENVIRONMENTAL PROTECTION AUTHORITY OF WESTERN AUSTRALIA
GUIDELINES FOR AN ENVIRONMENTAL PROTECTION POLICY ON THE COASTAL ZONE IN

WORKING DRAFT AND PRELIMINARY WORKING DRAFT

SUMMARY OF SUBMISSIONS

JANUARY 1978



SUMMARY OF SUBMISSIONS

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INTRODUCTION

The EPA has for some time considered that coastal management has a high priority in Western Australia. In its first Annual Report (1972) the EPA stated: ...

"that adequate management of the coastal strip not only as it pertains to mining, but also to residential development, recreational use and the like, is of very great importance in total environmental planning in the State. It is expected that coastal developments will continue to dominate the residential needs and desires of the population. It is therefore apparent that the coastal strip must be adequately managed in order that, for example, recreational usage should not be so heavy or concentrated as to be self-defeating and destructive of the natural ecology".

In such a complex matter as the best use and management of the coast the EPA felt it was most important that there be frank and open discussion, and full representation of all interests before any actions were undertaken.

Accordingly, in February 1976 the EPA circulated a document entitled "Preliminary Working Draft - Guidelines for an Environmental Protection Policy on the Coastal Zone in Western Australia". This document had a limited distribution for comment and discussion to those bodies and individuals with direct responsibilities or interests in the Coastal Zone.

Following receipt of comments and with appropriate discussions held, the EPA modified the Preliminary Working Draft and prepared a further Working Draft for full public review. The Working Draft (June 1977) was open for public comment and discussion from July to October, 1977.

The attached papers are a collated summary of all submissions that have been received on both drafts. In addition, an illustrative summary of some of the many talks and discussions that were held during the latter half of 1977 is included.

It is worth noting that the distribution of the Preliminary Working Draft and more notably the Working Draft raised and crystallised many new thoughts and initiatives to do with particular coastal problems and coastal management generally. This was especially true in the area of Local Government where many smaller Authorities are finding difficulty in tackling and managing the increased pressures in the coastal areas. Access to the coast, control of unvested coastal lands, control of off-road vehicles and funding for coastal management were issues that were raised time and time again.

There is no doubt that the general consensus of all of the submissions is for an improved system of coastal planning and management. Suggestions as to the means by which this can be achieved are varied but overall a high degree of support is shown for the type of approach suggested in the Working Draft.

1. WESTERN AUSTRALIA - GOVERNMENT DEPARTMENTS AND INSTRUMENTALITIES

Copies of the Working Draft and Preliminary Working Draft were distributed to fifty State Government Agencies. In addition copies were sent to all Regional Administrators and tertiary institutions. Four Government Departments requested further copies.

Twentynine submissions were received in this category of which two opposed the EPA's approach. The remainder either gave full or partial support, or discussed other means by which better co-ordination of coastal management might be obtained.

WESTERN AUSTRALIA - GOVERNMENT DEPARTMENTS AND INSTRUMENTALITIES

WORKING DRAFT

1. DEPARTMENT OF AGRICULTURE

- . The Working Draft is generally supported as is the Goal and overall objectives.
- . The Guidelines are not supported in their present form particularly Guideline 1 which is "likely to be interpreted as pre-empting certain uses". A rearrangement of the Policy Guidelines is attached to the submission.
- . The Implementation Section is endorsed with two points being highlighted. The first is the continuing education of the public and the second is the need for better co-ordination between all Government agencies.
- . In addition the submission contains a number of detailed minor comments about specific words and phrases in the text.

PRELIMINARY WORKING DRAFT

1.1 Scope of Policy

- . Query a single set of guidelines for whole W.A. coast.
- . A need was seen to grade the coast into areas of concern, both along and at right angles to the coast.
- . Need to recognise that activities outside the coastal zone can have major influence on the coast.

1.2 Guidelines for a Policy

- . "Proper" uses for the coastal zone must depend on:
 - a) inseparability of function from the coast;
 - b) suitability of the area for uses;
 - c) feasibility of management of the area.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

1. DEPARTMENT OF AGRICULTURE (Cont'd.)

- . Maximisation of public access should not be a matter of general policy - but if that is the case it should be dependent on b) above. Need to establish the desires of people.
- . Uses of the coast must take into account the ancillary effects; rights carry obligations.
- . Interrelationships are of fundamental importance; eg., degradation of land and water quality are often interdependent.
- . Interrelationships are of particular importance when considering adequate protection for various areas.

1.3 Implementation

- . Co-ordination seen as fundamental.
- . Continuing education is important; eg., the Extension service of the Agriculture Department.
- . Suggested that a more complete list of existing statutes be provided.
- . Divergence of opinion on whether a statutory authority should be set up immediately.

WORKING DRAFT	PRELIMINARY WORKING DRAFT
<p>1. <u>DEPARTMENT OF AGRICULTURE</u> (Cont'd.)</p>	<ul style="list-style-type: none"> . Coastal Resource Planner - a comparison is made to the Submission of the Department of Agriculture to the Committee of Inquiry into the National Estate (quoted) in which it is proposed that a recognised world authority in the field of land resource evaluation planning and use be appointed - terms of reference are given. <p>1.4 <u>Conclusion</u></p> <ul style="list-style-type: none"> . Principles and techniques applicable to W.A. are important in considering land use in the coastal zone. A similar approach to that suggested in the above submission may well be appropriate. Officers of the Department of Agriculture would endorse and co-operate with such an approach.
<p>2. <u>DEPARTMENT OF AGRICULTURE - WESTERN AUSTRALIAN HERBARIUM</u></p> <p>The EPA's approach in the Working Draft is supported and the following additional comments are made.</p> <ul style="list-style-type: none"> . A botanist should be included in the expertise of the Coastal Planning Committee. . Particular concern is expressed about the protection of flora and fauna. 	

WORKING DRAFT

PRELIMINARY WORKING DRAFT

3. AGRICULTURE PROTECTION BOARD OF W.A.

- . The aims and activities of the APB do not appear to conflict in anyway with the approach set out by the EPA in the Working Draft.
- . An offer of technical expertise in pest and plant control is made.

4. BUSHFIRES BOARD

- . The Board generally supports the EPA's approach and offers its assistance in an advisory capacity.
- . Recommends that fire protection be incorporated into the future overall planning concept.
- . The committee should include a representative from the Bush Fire Board.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

5. COMMUNITY RECREATION COUNCIL

- . Generally supports the Working Draft.
- . Requests that it be represented on any organisation which is set up to implement the policy.

6. EDUCATION DEPARTMENT

The Education Department referred to its previous detailed submission and further indicated the areas on the coast where studies are being carried out.

A detailed letter and a draft statement on guidelines for an educational policy on management of the Coastal Zone were submitted. The following comments are relevant to this summary:

- . The Coastal zone is a vital part of school studies especially since the environmental emphasis has increased. Before further erosion of natural biotic communities and geographical and geological features occurs, it is imperative that a policy is outlined and implemented to ensure the retention of strategic areas in the Coastal Zone for educational purposes.
- . A list of current study areas is given as well as types of field studies carried out.
- . Further studies are suggested to those listed in the EPA draft.

WORKING DRAFT

6. EDUCATION DEPARTMENT (Cont'd)

PRELIMINARY WORKING DRAFT

- In selecting areas suitable for educational purposes. There needs to be involvement with and recognition of bodies that have already carried out work.
- A detailed set of guidelines for an Educational Policy on the Coastal Zone are suggested.
- An Education Department representative with sufficient backup should be closely involved with the Coastal Resource Planner so as to cater for the communication of educational needs and changing priorities to the planning authorities.

7. ESPERANCE PORT AUTHORITY

- It is accepted by the Port Authority that a management policy for the protection of the Coastal Zone is desirable.
- Town areas adjacent to Ports which have been approved under a Town Planning Scheme should be excluded together with the waters within a Port boundary.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

7. ESPERANCE PORT AUTHORITY (Cont'd)

- . The appropriate Port Authority should be represented at the Committee when any area immediately adjacent to its sea and land boundaries is being considered.

8. DEPARTMENT OF FISHERIES AND WILDLIFE

This department is in general agreement with the Working Draft and supports the EPA's approach. The following comments are made:

- . Policy Guideline 1 tends to preclude proper uses of the Coastal Zone and commercial fishing is mentioned as a use that should be included.
- . The definition of the Coastal Zone should include non-tidal bodies of water and offshore reefs and islands.
- . An inventory of both the coasts physical and biological resources is desirable.

- . Against artificial boundaries - water catchments, wetlands etc should be included and viewed as biological units.
- . The aesthetic, scientific and economic importance of biota have not received due recognition in the draft Policy Guidelines.
- . The need to establish aquatic reserves and maintain proclaimed fishing zones is equally as important as recreation and tourist demands.
- . The need for co-ordination of records to prevent duplication and establish interlocking priorities is most important.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

9. FORESTS DEPARTMENT

- . The Forests Department generally endorsed the EPA's approach in the Working Draft. Previous comments on the Preliminary Working Draft are still relevant.

- . Overall approach and specific area covered is very sound.
- . Forests Department believes it could play a significant role in assisting with classification of dune and coastal types, stabilisation, revegetation and fire protection in specific areas and regulation of some recreational facilities.
- . Suggest a person connected with State recreation to be on the Coastal Planning Committee.

10. FREMANTLE PORT AUTHORITY

The above Authority opposed the EPA's approach on the following grounds:

- . The Authority must have control over its own area of jurisdiction. This may not be so if the EPA had the final word in the coastal zone.
- . Over-lapping authority in protection of the environment is generally opposed.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

11. GERALDTON COMMUNITY EDUCATION CENTRE

- The Community Education Centre notes that copies of the Working Draft have been widely read and well received.

12. GOVERNMENT CHEMICAL LABORATORIES

Generally agreed with the EPA's approach but queried the relationships of the proposed committee to existing estuarine and marine bodies.

13. HARBOUR AND LIGHT DEPARTMENT

- As the State Marine Authority should be represented on the Coastal Planning Committee.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

14. DEPARTMENT OF INDUSTRIAL DEVELOPMENT

As a general comment the Department of Industrial Development does not oppose the need for more co-ordinated coastal management but believes that this aspect needs to be seen as just one part of overall land use planning.

- . The Coastal Planning Committee should be established first to carry out research before any policy guidelines are recommended.
- . The guidelines should cater for both rural and urban areas.
- . Tourism and residential uses should be shown to be beneficial and not singled out as 'proper' uses in Guideline 1.
- . Uses determined to be "directly dependent" need to be considered as to both their technical and economical feasibility.
- . There is no need to rigidly protect the total coastline since there already are many adequate safeguards.
- . Research and management should reflect a multi-disciplinary approach.

In a detailed submission a general comment raised is that the proposals being put forward raise some fundamental questions which must be considered in the broader context of State wide planning.

14.1 Planning philosophy

- . It is believed that there is not a need for a specific coastal management policy but it is agreed there is a need to develop policies which focus on areas facing the greatest pressure.
- . The need is for effective and co-ordinated management of all zones and in this context the question is raised - why should the coastal zone be selected for special treatment? It would appear preferable to put the policy forward in the form of recommendations to the various planning authorities.
- . Difficulties are seen if the proposed policy has the force of law as flexibility is desirable.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

14. DEPARTMENT OF INDUSTRIAL DEVELOPMENT (Cont'd.)14.2 The Proposed Guidelines

- . The guidelines are too general for regulating activities as interpretation and application would be extremely difficult.
- . Undue emphasis is placed on tourism to the detriment of other important uses of the coast; for example ports.
- . No mention is made of the economic importance of the Coastal Zone and the criteria and mechanism to be used for assessing individual cases.
- . The policy with respect to mining should be explicitly stated.
- . A more detailed definition of resources is needed, especially if their use is to be restricted in anyway.

14.3 Implementation

- . Concerned about a proliferation of separate bodies involved in land use management.
- . In this context the report contains the implication that the EPA is the proper body to co-ordinate the planning and management of coastal land-use, whereas there are a number of bodies already working in this area.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

14. DEPARTMENT OF INDUSTRIAL DEVELOPMENT (Cont'd.)

- . Environmental issues are only one determinant in planning.
- . Costs of the proposed measures need to be evaluated.
- . Social and economic benefits need to be weighed against environmental benefits.

14.4 Conclusion

- . It is suggested therefore that the proposed guidelines eventually be put forward as recommendations to the existing planning agencies.
- . Further co-ordination of coastal activities if needed might best be achieved through the Planning and Co-ordinating Authority.

15. MAIN ROADS DEPARTMENT

- . There is a need to differentiate between urban and rural land within the Coastal Zone.
- . The term "proper use" within this zone is a subjective assessment.
- . Guideline 4 should allow for the use of road building materials within the Coastal Zone.

A number of areas are suggested which require consideration and clarification before full public comment.

- . The broad definition of the Coastal Zone has little correlation with the wide variation in coastal types; eg, it may be necessary to exclude urban areas covered by statutory planning schemes.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

15. MAIN ROADS DEPARTMENT (Cont'd.)

- A summary of potential conflicts which could arise through road activities being restricted is appended. This is set out on a regional basis.

- Justification needs to be given for uses that are given as "proper". Are the uses given in Guideline 1, a subjective assessment?

- The second guideline concerning access has implications for road building. M.R.D. should be fully involved in this area. M.R.D's. involved in two areas:

1. Planning and provision of roads.
2. Mining of materials for road construction.

In the second case M.R.D. would be concerned about any policies that added to the cost of obtaining these materials.

- Generally little difficulty is seen in correlating the objectives of the policy with M.R.D. activities

16. METROPOLITAN WATER BOARD

It is felt that the Working Draft implicitly recognises the activities of the Board. However, assurance is sought that these activities, such as ocean effluent outfalls and treatment plants will be allowed to continue under the strict conditions that already apply.

No conflict is seen and the concept is generally supported. A list of particular areas of interest is given.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

17. METROPOLITAN TRANSPORT TRUST

No objection is raised but the Trust looks to the Town Planning Department for control of its interests.

18. MINES DEPARTMENT

The Mines Department opposes the EPA's approach in the Working Draft and the following comments are made:

- . Relevant Authorities already control the coast adequately.
- . The EPA should maintain its environmental advisory role and provide information to the Planning and Co-ordinating Authority.
- . Guideline 4 is not realistic as some proper uses will adversely effect the coastal environment.

19. NATIONAL PARKS AUTHORITY

The Authority generally agrees with the EPA's approach.

- . It is important to stress that each of the optional multiple-purpose uses of coastal resources must be compatible with each other.

- . The views expressed by the Committee of Inquiry into the Mining Act are supported.
- . There needs to be a means of protection while appropriate guidelines are being prepared.

WORKING PARTY

PRELIMINARY WORKING DRAFT

19. NATIONAL PARKS AUTHORITY (Cont'd.)

- Management should be by one authority.

- An important area of control is that of vehicle access to dunes and foreshores.

20. POLICE DEPARTMENT

Acknowledgement was made of the Working Draft and reference made to previous comment on the Preliminary Working Draft.

Areas of possible interaction and liaison were raised, namely, oil spillage, transport of toxic materials, off road vehicles and litter control.

21. PUBLIC HEALTH DEPARTMENT

- A small committee of departmental officers considered the Working Draft and agreed in general with the policies and the proposed method of implementation.
- Guideline 3 should indicate the possible use of the coastal strip for ports dependent on the establishment of industries other than those associated with fishing.
- The Policy Guidelines should note the need for "buffer" zones between industrial and residential areas.

- Interests are in:

- (i) proposed density of population,
- (ii) methods of solid and liquid waste disposal,
- (iii) adequacy and potability of water supplies,
- (iv) location of industry, especially in respect of air and noise pollution.

Hence there is a need for interdepartmental consultation.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

21. PUBLIC HEALTH DEPARTMENT (Cont'd.)

- . The Health Department should have a major role with respect to the administration of statutes relating to air, water and noise pollution control and land usage.
- . The proposed committee should include a Health Department representative.

- . Location of industry with respect to residential areas in coastal areas is important.
- . It is noted that the P.H.D. is not included in the conceptual organisation.

22. PUBLIC WORKS DEPARTMENT

- . The Coastal Environmental Resources Planner should be appointed first and investigate the arguments for and against the declaration of the policy guidelines as an Environmental Protection Policy.
- . Funds for coastal works should continue to be used in the coastal investigation section of the Harbours and Rivers Branch and through the joint activities of the Public Works Department.
- . Since there already are groups dealing with Coastal problems separately, is there a need for a regulatory body?
- . The main purpose of the Coastal Planning Committee if formed, should be to provide guidance and help to the Coastal Environmental Resource Planner.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

22. PUBLIC WORKS DEPARTMENT (Cont'd.)

- . The planner should have a scientific background such as engineering.

23. STATE ENERGY COMMISSION

- . Guideline 3 should consider the technical and economic advantages of siting power stations on the coast.
- . "Scenic amenities" in Guideline 4 is a subjective term.
- . Requests that Guideline 5 be flexible enough to permit the S.E.C. to meet its obligations with respect to providing electricity and gas.

- . The S.E.C. is apprehensive about how Guidelines 4 and 5 might be applied in practice, in particular to the siting of power stations on the coast, before any endorsement could be given.
- . The S.E.C. would welcome the opportunity to discuss the Guidelines in more detail.

24. STATE HOUSING COMMISSION

- . It is considered that the Working Draft sets out its aims and ideals and that these are appropriate.

- . The S.H.C. has no objection at this time to the proposal for Coastal Zone Management and would be prepared to alert the EPA to any developments proposed.
- . A list of all S.H.C. landholdings (with maps included) in the Coastal Zone was included with the submission.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

25. DEPARTMENT OF TOURISM

In general support is given to the EPA's approach.

- . Existing groups involved in coastal matters should be transferred to the proposed new committee.
- . Suggest that the new group be named the "Coastal Zone Committee".

26. TOWN PLANNING DEPARTMENT

- . In so far as the policy remains advisory precise boundaries for the Coastal Zone are not important.
- . Protection of the coast deserves special mention and Guideline 4 should be recast as the primary guideline.
- . There is a need to emphasise the positive role of planning especially at the State Government level. The Town Planning Act is important in this respect.
- . Education and persuasion are preferable to regulation.

WORKING DRAFT	PRELIMINARY WORKING DRAFT
	<ul style="list-style-type: none"> • It is felt that a new statutory authority is not needed at this stage in W.A. Action through existing agencies is sufficient if areas where powers need to be strengthened are identified and action taken. • The suggested co-ordinating body should work closely with existing agencies giving advice on both control and technical matters.
<p>27. <u>TREASURY</u></p>	<ul style="list-style-type: none"> • It was noted that the Preliminary Working Draft made no mention of possible costs or sources of revenue.
<p>28. <u>WATERWAYS COMMISSION</u></p> <p>• Recommends that any legislation or policies resulting from this study should exclude any areas under the control of this Commission with the exception of ocean frontages but limited to some 200m - 300m inland</p>	

WORKING DRAFT

PRELIMINARY WORKING DRAFT

29. WESTRAIL

- . The EPA's approach is considered to a step in the right direction.
- . Concern is expressed at the thought of a blanket type approval which would classify all Crown land and reserves in the coastal strip as A class and clarification is called for on this point.

2. WESTERN AUSTRALIA - LOCAL GOVERNMENT AUTHORITIES

Copies of the Preliminary Working Draft were distributed to all Local Government Authorities having a coastal frontage (43), while the Working Draft was circulated to all Local Authorities with a minimum of 5 copies to each coastal Authority.

Thirtytwo submissions were received in this category virtually all, as might be expected, from coastal Local Authorities. Given the desire of Local Authorities to retain as much control as possible in their own areas, a high degree of support was given to the concept of an improved form of overall management.

Seven authorities opposed the EPA's approach and thirteen supported it, while twelve agreed in part or discussed the need for better co-ordination. Local Government highlighted the need to improve control of coastal lands so that problems such as posed by off-road vehicles can be contained and emphasised the need to provide funds for the preparation and implementation of coastal management plans.

WESTERN AUSTRALIA - LOCAL GOVERNMENT AUTHORITIES

WORKING DRAFT

PRELIMINARY WORKING DRAFT

1. TOWN OF ALBANY

- . Council supports the proposed Coastal Policy and offers its assistance towards realisation of the Management Committee.
- . Particular interest is expressed in the concept of a graphic Coastal Management Plan and its relationship to Regional and Town Planning Schemes.

- . The intent of the EPA proposals is generally supported.
- . The Shire of Esperance submission is also supported as it is believed these comments would provide a rightful role for Local Authorities

2. SHIRE OF AUGUSTA-MARGARET RIVER

- . Council is in basic philosophical agreement with the aims stated in the Working Draft.
- . A comprehensive inventory should be prepared in order to evaluate the needs of different areas within the Coastal Zone before any legislation is implemented.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

3. TOWN OF BUNBURY

- . The Coastal Zone Protection inside the Bunbury Town area should be the prerogative of the council who reserves the right to refer coastal dune development to the Environmental Protection Authority should it consider it necessary.

- . Council resolved on 26 May 1976 that control of land inside a Local Authority boundary should solely be the responsibility of the Local Authority.
- . Support for the Shire of Esperance proposals was also expressed.

4. SHIRE OF BUSSELTON

- . Council is in general agreement with the broad planning principles stated and supports the proposal that substantial responsibility for the implementation of these policies should rest with Local Authorities.
- . The lack of funds for coastal management purposes within a Local Authority is noted.
- . The proposed committee should be representative of local government bodies.
- . Local Authorities should be responsible for the implementation of policies.
- . A district Planning Scheme and a copy of the Scheme Text concerning landscape protection areas was attached to the submission.

WORKING DRAFT	PRELIMINARY WORKING DRAFT
<p>5. <u>SHIRE OF CAPEL</u></p> <ul style="list-style-type: none"> . District committees should exercise authority in their own area rather than a central authority 	<ul style="list-style-type: none"> . Council supports in principle the comments forwarded by the Shire of Esperance. . Council opposes control by a statutory body but would support control by Councils and an advisory body.
<p>6. <u>SHIRE OF CARNARVON</u></p> <ul style="list-style-type: none"> . The Working Draft appears to be a case for an increase in bureaucracy with little benefit for Local Government. 	
<p>7. <u>TOWN OF CLAREMONT</u></p> <ul style="list-style-type: none"> . Council accepts that there must be development control over the Coastal Zone and supports in principle the draft policy guidelines. . Council opposes any further legislation as proposed under an Environmental Protection Policy which would seek to control development in a one kilometre coastal zone in Claremont. It is believed that this area is already adequately controlled by existing legislation. 	

WORKING DRAFT

PRELIMINARY WORKING DRAFT

9. TOWN OF COTTESLOE

- . The EPA's approach is again generally endorsed with some minor changes to several sections.
- . The problems of having roads parallel to foreshores is especially noted.
- . Comments made previously about the problems of managing Metropolitan beaches are respected.
- . Additional comment is made on the need to more effectively control oil drilling and tanker transport operations.

- . The EPA's approach is generally endorsed.
- . A series of comments concerning the problems of managing Metropolitan Beaches is listed, including; multiplicity of controlling agencies, the importance and difficulty of retaining natural features under heavy usage and the difficulty that Local Authorities have in obtaining sufficient funds and technical expertise.

10. SHIRE OF DANDARAGAN

- . Council feels that the establishment of the Coastal Planning Committee will add additional controls on the Coastal Zone.
- . The Local Authority presently effectively manages development in the Coastal Zone.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

11. SHIRE OF ESPERANCE

The Shire of Esperance circulated its submission to the EPA widely within W.A. Consequently several other submissions contained reference to the Esperance comments. In summary these were:

- . Administration of recreational, tourist and residential should be at the local level and reserves for these purposes should be either vested in the Council or leased to local authorities under management charters.
- . There should be free access to the Coastal Zone.
- . Local Authorities should be encouraged to participate fully in the study, planning and control of coastal development with special grants being provided for the purpose.
- . A danger of environmental planning is that personal liberties are often unnecessarily restricted. It is important to consider the particular features, attributes and pressures acting on different areas.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

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WORKING DRAFT

PRELIMINARY WORKING DRAFT

12. CITY OF FREMANTLE

. Previous comments are applicable.

- . A lengthy report has been prepared and considerable discussion has taken place on the role envisaged for Local Authorities in ensuring the success of a Coastal Preservation Policy
- . It is suggested that implementation should be an MRPA and Town Planning Department responsibility because of the application of the guidelines through Town Planning Schemes.
- . Concern is expressed about the proliferation of "approving authorities".
- . For the policies to be completely effective it is essential that amendments be made to the Town Planning and Development Act, requiring all instrumentalities to comply with the Local Authorities Scheme requirements; eg., the City of Fremantle's foreshore is almost entirely controlled by instrumentalities.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

13. TOWN OF GERALDTON

- . Local Government should manage the protection of coastlines and foredunes.
- . Recommendation 1 is supported provided those appointed are capable of carrying out the duties as well as providing information in a language which may be understood.
- . Communication channels should be established to enable those directly involved in coastal management to have ready access to all the available information and experience.

14. SHIRE OF HARVEY

- . The EPA's approach is supported as presented in the Preliminary Working Draft.
- . In addition the Esperance Shire Council comments relating to administration through Local Government are supported.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

15. TOWN OF KWINANA

- . Agrees in principle with the report but has some reservations about Cockburn Sound.
- . The Cockburn Sound Conservation Committee should be retained.
- . Elected persons from each of the affected Councils should be included on any committee which may be created to investigate and comment upon the existing and future conditions in the Sound.

16. SHIRE OF MANDURAH

- . Council considers that a new authority would lead to a duplication of controls.
- . Recommendation 2 is supported provided that such an officer is accessible to both the local and statutory authorities and that the Minister for Town Planning or the Minister for Works administers the appointment.
- . Concern is expressed about the "jurisdictional overlap of agencies involved in management" (P.19 para.6). On the creation of the Coastal Management Committee would the other departments with similar aims and objectives be abolished?

WORKING DRAFT

PRELIMINARY WORKING DRAFT

17. CITY OF MELVILLE

- . Recommendation 2 is opposed.
- . The EPA's proposal should be amended to exclude the Metropolitan Region.

18. SHIRE OF MURRAY

- . The establishment of a Coastal Zone is opposed.

19. SHIRE OF NANNUP

- . Consideration should be given to owners of private property situated in the Coastal Zone with adequate compensation being paid for any purchases by the Government.
- . Settlers who have established cottages on the coast should not be over restricted.

- . Compulsory acquisition of private land is opposed.
- . Acquisition of freehold land should be at market prices.
- . If land is purchased an equal area of land should be thrown open for the vendor.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

20. CITY OF NEDLANDS

- . Council supports the approach set out in the Working Draft and notes its own studies in relation to beach and dune management.

21. SHIRE OF NORTHAMPTON

- . The Shire has had vested in its care the coastal strip between Kalbarri Townsite and Red Bluff and requests that a Department officer advises on management and a plan for future preservation and possible use.
- . Particularly concerned that the continued pressure of tourism will damage the coastal environment within the Shire.

- . Council views with concern any undue emphasis placed on access to beaches.
- . The problem of control of off-road vehicles is highlighted.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

22. CITY OF PERTH

- . A copy of the Council's own Protection Policy in respect of its coastal areas was submitted.
- . The investigation of the use of the "Chart of Human Impacts" for the British Coast as a flexible working tool for the 'Western Australian' Coastal Zone is suggested.
- . The guidelines need to be clarified as to how they are to be implemented and by whom.
- . The availability of funds for coastal management is questioned.

- . Council found the document interesting and constructive and supports the proposal to protect the beaches.
- . Council believes it has shown a positive lead in these matters in the context of a highly urbanised coast.

23. SHIRE OF PLANTAGENET

- . Council agrees that steps should be taken to preserve the Coastal Zone from damaging aspects without undue hindrance to public access and with due preservation of those already legally established within the limits of the proposed control zone.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

24. RAVENSTHORPE SHIRE COUNCIL

Local Government should participate strongly in coastal management through:

- . The management of reserves at a local level by vesting them with the Local Authority in preference to other bodies.
- . Involvement in the management at the local level of areas vested in other bodies should be encouraged so that local interests are adequately considered.

25. SHIRE OF ROCKINGHAM

- . The extent of the Coastal Zone could be considerably less, particularly in urbanised areas.
- . Concern is expressed at the possible duplication of powers.

26. SHIRE OF ROEBOURNE

No direct comment was made on the Guidelines but an offer to act as convenor for meetings within the Shire was made.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

27. CITY OF SOUTH PERTH

An explanation concerning the application of the Definition of the Coastal Zone as it applies to the Swan and Canning Rivers is requested.

28. CITY OF STIRLING1.1 General Comments

- . Local Government is not specifically mentioned in the organisation structure..
- . Setting up yet another committee may be ineffective.
- . The Metropolitan Region coast at least, should be the responsibility of the planning authority (MRPA or proposed State Planning Authority).
- . Planning control must apply to Government departments as well as to private developers.
- . Policies need to be adopted which will encourage good use of the coast and to manage areas under threat - a positive rather than a negative approach.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

28. CITY OF STIRLING (Cont'd.)

- . Power and funding to acquire land as necessary must be a reality.

1.2 Specific comments on the Guidelines

- . Concern is expressed at the criteria for decision making in determining a "proper use" of the coast.
- . Problems of legal definition may also be encountered if the Guidelines are used in there present form.
- . Generally, the Guidelines are seen as expressing worthy ideals but would be very difficult to implement in practice.

29. SHIRE OF VICTORIA PLAINS

- . The shire is concerned with problems such as the control of litter, fire and the provision of access to the Coastal Zone where the only means of access is through private property.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

29. SHIRE OF VICTORIA PLAINS (Cont'd.)

- . Concern is also expressed about the possibility that any Authority responsible for the Coastal Zone will become "top heavy" with administrative costs.
- . It is recommended that the proposed authority should have a strong representation from Local Government.

30. SHIRE OF WANNEROO

- . Overall the Guidelines are supported.
- . An offer of assistance from the Shire Engineer and Planner in future deliberations is made.

31. SHIRE OF WAROONA

- . The Guidelines are opposed.
- . The EPA's approach is seen as a duplication of power.
- . Local Authorities should administer lands within the Coastal Zone.

- . The Preliminary Working Draft is opposed in its present form.
- . Council believes that the Coastal Zone within the boundaries of individual Shires would best be locally administered.

WORKING DRAFT	PRELIMINARY WORKING DRAFT
<p>31. <u>SHIRE OF WARCONA</u> (Cont'd.)</p> <ul style="list-style-type: none">The lack of funds for coastal management is highlighted.	
<p>32. <u>SHIRE OF WICKEPIN</u></p> <ul style="list-style-type: none">The problems encountered on the coast are so varied and complex that as laymen it is not possible to suggest any line of action other than, as far as technically possible, to assist nature in every possible way.	

3. WESTERN AUSTRALIA - COMMERCIAL, MINING AND INDUSTRIAL INTERESTS

The Working Draft was distributed to Thirtysix organisations in this category with ten copies to groups such as the Chamber of Mines, Chamber of Manufactures and the Australian Fishing Industry Council. A further thirteen copies were requested following circulation.

Eight submissions were received including two at least which were composites of wide distribution and discussion amongst member bodies.

No submissions expressed outright opposition to the EPA's approach but most pointed out the interests of the organisations concerned and how these might be affected. Representation of interest was raised as a key point in almost every submission.

WESTERN AUSTRALIA - COMMERCIAL, MINING AND INDUSTRIAL INTERESTS

WORKING DRAFT

PRELIMINARY WORKING DRAFT

1. AUSTRALIAN FISHING INDUSTRY COUNCIL (W.A. BRANCH INC.)

The AFIC circulated the Working Draft widely amongst its members and entered into discussion with the Department of Conservation and Environment.

- . The AFIC requests that the Coastal Planning Committee include a representative from itself.
- . One of the tasks of the CPC might be to consider a redefinition of the Coastal Zone.
- . Free access for professional fishermen to the coast and along the beach must be guaranteed.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

2. AUSTRALIAN INSTITUTE OF LANDSCAPE ARCHITECTS

(W.A. BRANCH)

The W.A. Branch agreed generally with the EPA's approach but made the following comments:

- . There is need for a thorough understanding of the direct and indirect effects of the imposed pattern of use on the Coastal Zone.
- . To place responsibility with Local Authorities is thought to be unrealistic. Therefore it is agreed that the State Government should assume responsibility for policy making, planning and especially implementation of policies.
- . The Coastal Zone is best defined by natural boundaries.
- . The assessment and planning for the coast should be with the existing Town Planning Department not with the EPA, but value is seen in the EPA drawing up a policy to be implemented by the Planning Department. Landscape architects have skills to offer in this process.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

3. THE CHAMBER OF MINES OF W.A. INC.

The Chamber considered the Working Draft in some depth and clarified several areas of concern during discussions with the Department of Conservation and Environment.

- . The Working Draft should have been edited more fully to remove ... "as many ambiguities as possible".
- . The EPA initiative in furthering relevant studies of Coastal Zone ecology and those sections of the Coastal Zone under stress is supported. Priorities need to be established for such studies.
- . The Chamber agrees in principle to conservation per se and the creation of reserves for this purpose with the following provisos:
 - (i) A reserve should be created only after a full environmental assessment, including a study of other possible land uses has been carried out.
 - (ii) There should be periodical review of the status of reserves.
 - (iii) Reserves should only be created if there is provision for management.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

3. THE CHAMBER OF MINES OF W.A. INC. (Cont'd)

- . The concept of multi-purpose use of the coast is weakened by nominating certain uses as "proper". Therefore the three favoured uses in Guideline 1 should be deleted. The word proper could be replaced by inserting such words as ... "Favoured, but not exclusive uses of the Coastal Zone are -", or similar words.
- . In terms of coastal management, the Chamber believes it qualifies as having "proven management ability" (See p.19 of the Working Draft).
- . Any move towards co-ordination of Government Departments by a single body is supported.
- . The Chamber has reservations about the establishment of another government instrumentality as suggested for investigation on page 22 of the Working Draft (Item vii).
- . Concern is expressed that the proposed senior level Coastal Planning Committee includes the general public but no representation from industry is specifically mentioned.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

3. THE CHAMBER OF MINES OF W.A. INC. (Cont'd)

- . Concern is expressed that industry will be adversely affected by having its activities influenced by a body with no real knowledge of the complexities of industry.
- . The definition and goal should be reworded in clearer English to remove ambiguities.
- . The summary statement of the guidelines on page 2 is misleading without the amplification later in the Working Draft.
- . The document appears to concentrate on the recreational activities of the community and ignore its economic activities.
- . The Chamber objects to the recommendation contained in Guideline 3 that use of the Coastal Zone, other than for recreation, tourism and housing, should not be permitted unless "directly dependent on resources within the coastal zone".
- . Activities which have a choice of location in comparison to those which have not, must be considered.
- . The term "specialised industry" in Guideline 3 (page 16) is queried.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

3. THE CHAMBER OF MINES OF W.A. INC. (Cont'd)

- . Allowances must be made for the location of processing facilities on the coast which are of recognised practical and economic importance.
- . Mining and Industrial uses should try to enhance the environment and to add to scenic amenity as far as possible but it must be recognised that some activities will have an adverse effect.
- . "The prohibition implied in paragraph 5 of the guidelines, assuming a one kilometre inland limit, coupled with standards in paragraph 4, seems to be heavily weighted against the development of mining and associated industries in designated areas of the coastal zone, and could impose a substantial constraint on further development and investment".
- . The Chamber agrees with the recommendation contained in Guideline 5 that public benefit should be considered as an overriding factor.
- . The Chamber points out that the costs of implementing the programme outlined in the Working Draft would be ... "astronomical".

WORKING DRAFT

PRELIMINARY WORKING DRAFT

4. CLIFFS WESTERN AUSTRALIA MINING CO. PTY. LTD

- . The Working Draft is ambiguous in some respects.
- . The policies should be gazetted so that the obligations of industry are made clear.
- . The Minister for Industrial Development and Mining should be included on the Advisory Committee.

5. DAMPIER SALT

- . In the Pilbara coastal planning and management would best be carried out through a regional planning committee representing Government, Industry and the local community.
- . The establishment of a Coastal Planning Committee does not appear to be warranted if due recognition is given to the three existing statutory control bodies, namely the Environmental Protection Authority, the Conservation and Environment Council and the Department of Conservation and Environment.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

5. DAMPIER SALT (Cont'd)

- . Unrestricted, but sensibly managed utilisation of the Coastal Zone is essential for the production of salt using solar evaporation.
- . Dampier salt have already adopted some of the principles and philosophies outlined in the Working Draft in managing their own area.

6. PASTORALISTS AND GRAZIERS ASSOCIATION OF W.A.

- . There would be costs associated with resurvey and the erection of fences on pastoral properties if the Coastal Zone as defined was to be protected. Compensation would be mandatory.
- . Boundaries should be based on natural features so that habitats are not adversely affected.
- . Maintenance and management of the coastal strip in such areas should be the responsibility of the Government.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

7. SOUTH COAST LICENSED FISHERMENS ASSOCIATION INC.

- . The definition of the Coastal Zone should only include those parts of the coast that are not in common usage.
- . The EPA proposals are too vague and broad in regard to the people and industries that have traditionally used coastal areas.
- . Other specific sections of the community, such as industry, should be mentioned as meriting representation on the Coastal Planning Committee.
- . The role of the Coastal Resource Planner needs to be more fully defined.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

8. WESTERN AUSTRALIAN PETROLEUM PTY. LTD. (WAPET)

WAPET in a detailed submission outlined the responsible role that the oil industry has played in exploration and development. The following comments are specifically related to the Working Draft.

- . Economic costs and benefits need to be more fully considered.
- . Guideline 3 is regarded as too prohibitive.
- . It is suggested that Guideline 4 be qualified by adding ... "to the maximum extent feasible"... after should in line 1.
- . The proposed Coastal Planning Committee should include a representative from the Petroleum Industry.
- . Interdepartmental liaison and deliberation should be streamlined.

4. WESTERN AUSTRALIA - PRIVATE GROUPS AND INDIVIDUALS

Sixtytwo copies of the Working Draft were distributed and a further fiftyseven requests were received in this category.

Of the Thirtyone submissions, two totally opposed the EPA's approach while the remainder either supported it or raised particular issues.

WESTERN AUSTRALIA - PRIVATE GROUPS AND INDIVIDUALS

WORKING DRAFT

PRELIMINARY WORKING DRAFT

A. PRIVATE GROUPS

1. AUSTRALIAN MARINE SCIENCE ASSOCIATION - W.A. BRANCH
(AMSA)

AMSA prepared detailed submissions on both the Preliminary Working Draft and the later Working Draft. In both cases general support was expressed for the EPA's approach followed by particular comments.

- . Areas of immediate concern are those where control is not presently vested in a responsible management body.
- . The need for preparation of an inventory of both the aquatic and terrestrial components of the coast's biological and physical resources is highlighted.
- . AMSA should be represented on the management committee.
- . A copy of "Proposals for the establishment of Marine Reserves in W.A." was attached to the AMSA submission.

- . As in the Working Draft the need for an inventory of coastal resources to precede management is highlighted.
- . Preparation of a worthwhile policy requires that the objectives of coastal zone management and the resources of the coast be thoroughly understood and clearly stated. A suggested policy of nine points is then enumerated in the submission.
- . Coastal studies are fundamental and should be further detailed; eg., coastal water circulation is an important addition.
- . Local Government must act only with the approval of the "coastal co-ordinating body".

WORKING DRAFT

PRELIMINARY WORKING DRAFT

1. AUSTRALIAN MARINE SCIENCE ASSOCIATION - W.A. BRANCH
(AMSA) (Cont'd)

- The most important tasks of the coastal co-ordinating body are seen by AMSA as the development of a Coastal Management Plan and the determination of areas in which further study and research is needed. The co-ordination of research on the Coastal Zone should also be strongly emphasised as an important task of the co-ordinating body.
- Finally AMSA emphasises that the Coastal Zone is a State asset used by the community as a whole - hence it is believed that management and funding should be the responsibility of the State Government. The proper role of Local Government is to aid implementation of the management policy.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

2. COASTAL PROTECTION ASSOCIATION INC.

The EPA's approach is generally endorsed and supported and the following specific comments are made.

- . Guideline 5 appears to be ambiguous and needs to be reworded.
- . Cooperation between the management committee and Local Government is fundamental. Federal and State Governments should provide additional funding.
- . Public education is vital.

- . Major roads, highrise buildings and urban residential development should be excluded from the Coastal Zone, depending to some extent on the eventual definition.
- . The further study and inventory of coastal features needs to be undertaken so as to better define those areas best suited to uses such as ports, marinas, boat launching etc.
- . The relevant Local Government Authority should be represented on management committees when coastal land within that authority's boundaries is being dealt with.
- . The Conservation Council of W.A. should similiarly be represented.
- . A general comment is that present committees seem too heavily weighted in favour of Government officers.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

3. COTTESLOE COMMUNITY ASSOCIATION OF RATEPAYER'S INC.

- . The goal should be redefined to include ... "relative to that zone's optimum Natural State".
- . Coast roads which are damaging to the environment should be eliminated.
- . Residential development should be acceptable provided that it does not encroach on the unstable dune system or prohibit beach access.
- . Guideline 2 should include ... "Further, certain suitable designated coastal areas should be deliberately left difficult of access to cater for the concept of wilderness or 'natural areas'".
- . The document is too philosophical and vague.
- . Page 35 should make a statement as to who has power and authority for action and who funds works.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

4. LEEWIN CONSERVATION GROUP

This conservation group made detailed comments on both drafts, concentrating to some extent on management issues associated with the Leeuwin - Naturaliste Ridge. The EPA's approach is strongly supported and it is recommended that if a statutory authority is not formed an interim co-ordinating body be set up.

- . The lack of communication between the political level (both State and Local) and the general community in matters of conservation and coastal management is discussed.
- . As a consequence development and implementation of coastal management policies by an independent body is seen as desirable.
- . Concern is expressed that delay in setting up a stronger form of coastal management will result in the despoilation of many more beautiful areas of coastline.
- . Reference is again made to the "Overview Resources Study".
- . Concern is expressed at further uncontrolled development east of the Leeuwin-Naturaliste Ridge.

- . The lack of channels for public influence in coastal matters is noted.
- . The group recommends the establishment of one management authority over the Leeuwin - Naturaliste Ridge. Generally Local Government Authorities should not have final control in the Coastal Zone.
- . Reference is made to a review carried out for the group ... "Overview Resources Survey of the Leeuwin Naturaliste Region 1975". It is suggested that the area be declared an "English Style" National Park.
- . Problems encountered are noted, including the diversity of government controls, off-road vehicles and ugly developments in scenic areas.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

4. LEEUVIN CONSERVATION GROUP (Contd)

- . Specific comments on the Goal, Objectives and Guidelines centre tightening up the wording to emphasise the conservation aspects.
- . Environmental assessment of major coastal developments must be subject to public review and a set of working rules is suggested for such studies.
- . It is suggested that funds for future coastal management (however it is structured) might be obtained from utilisation of coastal resources; eg., from levies on royalties paid.
- . Close liaison with the Federal Government is recommended in order to harmonise management and funding arrangements.
- . The group feels pressures on the coast are such that urgent action is needed and reiterates the need for at least an interim authority or committee.
- . The Definition of the Coastal Zone appears to exclude barred estuaries and underground streams.
- . The Group strongly supports the idea of Local Government producing policies and planning schemes for local coastal areas and recommends that untied funds be made available for these purposes.

WORKING GROUP	PRELIMINARY WORKING GROUP
<p>5. <u>NATIONAL TRUST OF W.A.</u></p> <p>General support for the EPA's proposal was expressed by the Trust following both the Preliminary Working Draft and the Working Draft.</p>	
<p>6. <u>NORTHAMPTON ANGLING CLUB</u></p> <p>Concern was expressed by the Club about future use of four wheel drive vehicles and access to the coast.</p>	
<p>7. <u>THE OFFSHORE ANGLING CLUB OF W.A.</u></p> <ul style="list-style-type: none">• The retention of tracks and beach access for off-road vehicles is requested.• The problem of off-road vehicles is recognised and support given for registration, comprehensive third party insurance and appropriate regulations.• Generally this type of club sees itself as a responsible user of the coast.	

WORKING GROUP

PRELIMINARY WORKING GROUP

8. PEEL PRESTON PRESERVATION GROUP

The Group generally supports the EPA's approach in the Working Draft and makes the following additional comments:

- . The Coastal Zone should be defined to include one kilometre from the banks and shores of all tidally affected waters.
- . The EPA should have presented a more positive conservation statement on the Coastal Zone.
- . Residential activities should be considered as inappropriate uses of the Coastal Zone.

9. RUABON AND DISTRICTS PROGRESS ASSOCIATION

- . What appears to be an adoption of the State ALP 1977 election policy is opposed.
- . The coastal strip is believed to be adequately administered under present conditions.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

10. SOUTHERN REGIONAL CONSERVATION COUNCIL

- . The suggested guidelines are strongly supported.
- . An addition to the list of studies is suggested; "Types of buildings suited to coastal areas of W.A. that are functional and blend in aesthetically with the character of the area concerned".
- . It is essential that the boundaries of the Coastal Zone be flexible - dune systems must be planned as a whole.
- . In relation to Guideline No.4 it is felt that every endeavour should be made to use natural vegetation in reclamation work.

11. SURFCASTING AND ANGLING CLUB OF W.A.

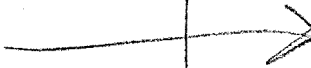
- . Concern is expressed about the right of future access to the coast.
- . Again, this club sees itself as a responsible user of the coast especially with respect to the use of off-road vehicles.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

12. SWANBOURNE RESIDENTS GROUP

- . The particular concern of this Group is the building of continuous roads along the coast which is opposed.

13. THE TREE SOCIETY

The Tree Society generally supports the EPA's approach and makes the following additional comments.

- . On page 12, objective (ii) could be altered as follows: "In this context the main aim should be that the community as a whole should own the foreshores".
- . The EPA should be responsible for the carrying out of gazetted controls.
- . Guideline 3 on page 16 should become Guideline 2. Specialized industry and beach sand mining should be permitted only after a qualified independent environmental assessment has been carried out. Public access should be controlled.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

13. THE TREE SOCIETY (Cont'd)

- . In reference to p.21, the influence of land developers and real estate agents in local government is noted. An ecological survey of the Coastal Zone should be carried out before the implementation of the proposals.
- . The Coastal Planning Committee should be set up as an interim working committee.

14. WESTERN AUSTRALIAN INSTITUTE OF TECHNOLOGY -
PHYSICS DEPARTMENT

It is noted that the Physics department of WAIT is involved in research in the Coastal Zone.

- . The aquatic, terrestrial and atmospheric environments should all be considered.
- . The administrative role of the Coastal Protection Committee should be further outlined.
- . A Coastal Studies Group of the Coastal Protection Committee should be formed, comprising representatives from the CSIRO, the Australian Marine Science Association, tertiary education institutions and interested community groups. This Group would be a source of expert information.

WORKING GROUP

PRELIMINARY WORKING GROUP

15. W.A. SHELL CLUB

The EPA's approach is endorsed and supported by the W.A. Shell Club

16. WESTERN WALKING CLUB

- . The production of first class maps is noted as important.
- . Problems of access to walking trails in some coastal areas are noted.
- . It is recommended that the 1 kilometre Coastal Zone be a minimum, and be extended where necessary for special features.
- . Link up of the coastal strip to nearby recreation areas is also discussed.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

B. PRIVATE INDIVIDUALS17. Dr. T. Bell

- . The definition of the Coastal Zone should in effect be more flexible in order to provide for the diversity which may occur between certain areas.
- . Any additional residential constructions should be excluded from the Coastal Zone.
- . The use of environmental impact statements should be included in the Guidelines in each case to outline the impact of proposed actions.
- . Jurisdictional authority over areas of the Coastal Zone should lie at the state level with the EPA as the major decision maker.

18. R. Deering

- . Mr. Deering's prime concern is with the Peel region where he suggests that future highways and major roads be separated from the coast by a buffer, especially in fragile erosion prone areas.
- . In a detailed submission an alternative highway network for the region is set out.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

19. Dr. W. Ewers

Dr. Ewers expresses general support for the EPA's approach and goes on to suggest some specific but minor changes to the Preliminary Working Draft.

20. D. Forrest

- . Mr. Forrest is against the EPA's approach believing the Guidelines and proposed committee to be a further encroachment on private property rights.
- . An objection is made to what is said to be the use of part of the wording of the 1976 State ALP policy.

21. J.R. Gee

- . Requests that hang gliding activities be considered prior to the formulation of Coastal Zone management and protection policies.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

22. Dr. R. George

After outlining the complexities and problems involved in coastal management, Dr. George makes the following recommendations in his submission:

- . The Environmental Protection Authority continue to improve and clarify "Guidelines for coastal management" with all possible speed, using all the resources available in the State.
- . The Authority approve the establishment of a coastal planning and management section responsible to the Authority or to the Department of Conservation and Environment.
- . The appointment of a highly trained and experienced coastal geographer or geomorphologist be made urgently to compile an inventory of the natural resources of the coastal strip, and a description of the extent and effect of the man-made structures on the natural processes that operate on the coast.
- . The Authority plan to then appoint a coastal planner and manager to direct and develop the coastal planning and management section.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

23. Dr. M. Hollick

While expressing support for the EPA's overall approach Dr. Hollick is critical of some aspects of the Working Draft and makes the following comments in his submission.

- . The draft goal seems to be grammatically poor, uses terms which are unfamiliar to many people and which have no precise definition.
- . The Western Australian Environmental Protection Act 1971 should be amended so that the definition of 'Environment' is similar to the definition in the Australian Act if the EPA's approach in the Coastal Policy Guidelines is to be seen to be consistent.
- . The definition of the Coastal Zone should be based on natural biological or land form units with the one kilometre distance being a standard which may be altered according to the requirements in any particular area.
- . The Guidelines should be modified by defining terms and incorporating the qualifications that are made. Two additional Guidelines are suggested and are noted below:

WORKING DRAFT

PRELIMINARY WORKING DRAFT

23. Dr. M. Hollick Cont'd.)

(i) "Existing crown lands within the coastal zone should remain in public ownership, and, whenever possible, opportunities should be taken to extend the area so owned".

(ii) "Uses especially those which require an irreversible and irretrievable commitment of resources of the Coastal Zone should only be permitted if determined to be of overriding public benefit".

- . The Coastal Planning Committee and necessary staff should be established as a temporary body to develop a policy which should then be gazetted.
- . Policies should be gazetted, since local authorities are responsible for much of the implementation of the guidelines and being frequently subject to financial pressures could very likely allow undesirable types of development.
- . The need for effective management of the estuarine systems is highlighted.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

24. P.A. Jones

Mr. Jones submitted a lengthy but most interesting document made up of two parts; a theoretical study of the beach as a complex sociological and physical phenomenon, and a series of proposals based on Cottesloe for a management strategy.

The document outlines what might be done in a situation like Cottesloe to increase the satisfaction of the beach user in the light of anticipated increased density and urbanization of the beachfront.

25. M.P. Michael

This submission outlines specific problems associated with the establishment of a Coastal Zone in pastoral areas.

- . The variety of coastal types is not considered sufficiently.
- . Hence the guidelines do not provide for diversity.
- . Station owners should be responsible to some degree for management and control of coast lands within their properties, including the limiting of access.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

26. Dr. R. Silvester

Dr. Silvester is a recognised authority in the field of coastal dynamics and his submission goes into some depth in discussing the pros and cons of the EPA's approach. His own summary of his submission is as follows.

"In spite of its preliminary nature and supposedly limited distribution, this draft should have been much better balanced. It should have concentrated on philosophies of dealing with a vast coastal margin and means of a continuing discussion with the few available experts in the community. It contains too many specific issues which side track the reader. The concept of a new coastal co-ordinating body should be the subject of a wide ranging enquiry, either by a single consulting group or by a number of separate parties concentrating on different aspects. Public enquiries or royal commissions as such will not receive the in-depth opinions so necessary in such complex matters as coastal management".

WORKING DRAFT

PRELIMINARY WORKING DRAFT

27. B.B. Taylor

- . The Coastal Development and the proposed Coastal Planning Committee should be combined into one body.
- . The secretariat should be financed by the government.
- . Membership on the secretariat should be recruited from experienced practical people with field experience.

28. R.B. Wilson

Mrs. Wilson fully endorses the EPA's approach in the Working Draft.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

29. J. Utting

- . Mr. Utting again expressed his support for the EPA's approach in the Working Draft and repeated his concern about the problems of managing Metropolitan Beaches.
- . Further concern was expressed at the dangers associated with oil drilling and transport off the W.A. coast.

- . Mr. Utting supported the EPA's approach in the Preliminary Working Draft especially with respect to Metropolitan Beaches where he believes a separate controlling body is needed.
- . The majority of this submission dealt with the management problems of Metropolitan Beaches including; the multiplicity of controlling agencies, the importance of preserving natural controls (eg. foredunes) and the problems that Local Authorities have because of lack of funds and technical expertise.

30. Prof. M.J. Webb

- . Professor Webb expressed general support for Dr. Sylvester's approach (see earlier No.21).
- . There is an obvious need for coastal development in a metropolitan area where a balance between preservation, conservation and development should be the aim. As a consequence uniform principles are not appropriate.
- . One example of this approach is treatment of the sandy dunes; man cannot always keep them in a pristine state.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

31. D.B. Williams

- . General support was expressed for the EPA's approach in this submission.
- . When and if restrictions are placed on land or water use, primary industries such as fish farming should be taken into account.

5. INTERSTATE - COMMONWEALTH GOVERNMENT AND PUBLIC BODIES

Nineteen copies of the Working Draft were distributed interstate and a further nine requests were subsequently received in this category.

All of the eight submissions in some degree expressed support for the approach suggested in Western Australia.

INTERSTATE - COMMONWEALTH GOVERNMENT AND PUBLIC BODIES

WORKING DRAFT

PRELIMINARY WORKING DRAFT

1. BEACH PROTECTION AUTHORITY - QUEENSLAND

The BPA again expressed interest in the Working Draft.

- . The BPA expressed great interest in the EPA's approach saying it was very similar to their own.
- . The Guidelines as set out in the Preliminary Working Draft appear sufficiently comprehensive and flexible.
- . The roles of State and Local Government in general terms are in agreement with the Queensland approach.

2. COMMONWEALTH BUREAU OF METEOROLOGY -
W.A. REGIONAL OFFICE

The Regional Office endorses the EPA's approach as contained in the Working Draft and points out the importance of coastal meteorology.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

3. CSIRO DIVISION OF LAND RESOURCES MANAGEMENT

- . There is a possibility of premature adoption of a policy based on an inadequate data base. It is recommended that a set of flexible guidelines be formulated as a first step, followed by more specific policies as the data base improves.
- . It is agreed that there should be a full time coastal co-ordinating body. This body should have "two aims";
 - a) policy and co-ordination,
 - b) a "deeper" type of research section.
- . The general nature of the Guidelines is supported.
- . Research is an area where CSIRO can play an important role but this must be related to planning and implementation - a particular interest is in the development of models for conflict resolution and to aid in decision making and management.
- . Omissions from the suggested areas of interest appear to be;
 - a) an inventory of the coastal heritage,
 - b) sociological research.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

4. CSIRO DIVISION OF LAND USE RESEARCH

- . General support is expressed for the EPA's approach.
- . Guideline 2 does not appear to provide for effective protection from off-road vehicles and it is suggested that certain areas should be closed to vehicles.

5. DEPARTMENT FOR THE ENVIRONMENT - SOUTH AUSTRALIA

- . The need is seen for a statutory authority to be set up in the short term.
- . Successful coastal zone management requires three important ingredients:
 - (i) public support
 - (ii) finance
 - (iii) adequate legislation to control inappropriate uses of the coast.
- . Most of the immediate problems of coastal management concern land use - studies should include research into land tenures, land use and demand, tourist trends, general recreational requirements and conservation needs.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

5. DEPARTMENT FOR THE ENVIRONMENT - SOUTH AUSTRALIA

(Cont'd).

- . The appointment of a Coastal Resource Planner is appropriate but an engineering bias is noted in the document.
- . Much damage to the coast is caused by public use where Local Government cannot afford to put facilities or there are inadequate facilities. Therefore financial power is important to assist Local Authorities.
- . Our Coast Protection Board strongly believes that the most appropriate way in which this work can be undertaken is by way of a statutory body, such as themselves. There is little doubt that this has some advantages but, in my opinion, it is preferable to establish an Advisory Committee or Committees to advise an implementing Minister serviced by appropriate public service officers.

6. MINISTRY FOR CONSERVATION (VICTORIA)

The EPA is congratulated on its comprehensive approach to coastal management. The Ministry for Conservation is investigating a similar approach for the whole Victorian coastline.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

7. MINISTRY FOR CONSERVATION - ENVIRONMENTAL
PROTECTION AUTHORITY OF VICTORIA

General support is expressed by the Victorian EPA and the following specific comments are made.

- . Guidelines 1, 2 and 3 do not specifically mention agricultural and other rural land uses.
- . There is a change between Guideline 4 on (page 2) and (page 17).
- . The use of "including" and "and" in guideline 4, in relation to natural scenic amenity appears to suggest that natural scenic amenity is not included per se within the phrase "coastal environmental quality".

8. PORT PHILLIP AUTHORITY - VICTORIA

- . The PPA is in the process of preparing management policies and plans for its own area of jurisdiction and is most interested in the EPA's approach.
- . It is noted that no mention is made of the socio-economic aspects of the use of the coast.

6. INTERSTATE - PRIVATE GROUPS AND INDIVIDUALS

The Working Draft was distributed to ten groups and individuals and thirty requests were subsequently received outside of Western Australia.

Although, considering the lack of advertisement outside W.A., this indicated a wide degree of interest, only two submissions were received, both from individuals. Each supported the EPA's approach and commented in some detail on particular aspects of coastal management.

INTERSTATE - PRIVATE INDIVIDUALS

WORKING DRAFT

PRELIMINARY WORKING DRAFT

1. Dr. L.C. Collett

- . The EPA is congratulated on producing what is considered to be ... "a clear and forceful statement on Coastal Zone management problems and philosophy which members of the public can read with profit.
- . Residential is not considered to be a "proper" use of the coast. Rather, the onus should be on the developer to show why he should be given the privilege of using a coastal resource.
- . Further guidelines may be needed and the Australian Marine Sciences Association booklet "Guidelines for the Protection and Management of Estuaries and Estuarine Wetlands" is enclosed.
- . The definition of the Coastal Zone may need to be extended to include wetland vegetation in certain areas; for example, on the Kimberley Coast.
- . No construction should occur on beaches, dunes, river deltas and estuaries because of their "plastic" nature.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

1. Dr. L.C. Collett (Cont'd.)

- . Education concerning the need for Coastal Zone management (especially of politicians) is vitally important.
- . As a fifth objective preference should be given to activities based on use of renewable resources.
- . State control is important because of "lack of perspective" in Local Government.
- . If residential development is to be allowed in the Coastal Zone a minimum distance from HWM should be set.
- . A vigorous approach to coastal zone management is unlikely if implementation is through existing agencies although co-operation and liaison with existing agencies is vitally important.
- .. A preference for a Coastal Zone Management Authority is expressed and suggested legislative and administrative structure is set out.

WORKING DRAFT

PRELIMINARY WORKING DRAFT

2. Dr. R.G. Woodward

The EPA's approach is generally supported and the following specific comments are made.

- . The goal should be drafted in the interests of the Coastal Zone rather than in the interests of the whole community.
A suggested rewording is:

"The Coastal Zone should be used and managed to prevent degradation of the coastal resources and environment".
- . In the objectives on page 12 foreshore should be defined, "where possible" in (iii) should be deleted and (iv) should be restated as ... "All Coastal Zone resources should be conserved or utilised to minimize degradation of the environment".
- . In Guideline 2 waterfront should be defined, or if not substituted by Coastal Zone.

7. TALKS AND DISCUSSIONS

TALKS AND DISCUSSIONS

Numerous discussions were held with individuals and groups and several talks were given during the course of preparation and distribution of both the Preliminary Working Draft and Working Draft. Many of the issues raised were common and the summary of various talks and discussions below is indicative of these issues. All of the notes below result from the period of public comment for the Working Draft, July to October, 1977. Many discussions also involved onsite inspections of local areas and problems.

1. PUBLIC MEETINGS AND DISCUSSIONS IN THE NORTH-WEST

Public meetings were held at Karratha and Port Hedland and discussions were held with the Shire of Roebourne, the Regional Administrator and several private individuals.

1.1 Karratha (Public Meeting)

- . Two overall general coastal issues dominated discussion by people in the area from Roebourne to Dampier. These were the use of the coast and offshore islands by the community and the impact of present and future development on the coast. It was stated that the Coastal Zone was vitally important to the people of the area for recreation but that only very limited areas were suitable for most public uses.
- . A general feeling was that the local community should form a committee to set out local desires and needs.
- . Funding for coastal management was raised as a problem, particularly the competition for funds between the State, Federal and Local Governments.

1.2 Port Hedland (Public Meeting)

In addition to similar issues raised at Karratha the following comments were made:

- . Concern was expressed at the need to know, and difficulty of understanding the natural processes and cycles involved in coastal dynamics.
- . The Commonwealth's involvement in the development of and adherence to coastal policies was queried.
- . Concern was expressed about a restrictive application of the Guidelines if they became law.
- . Concern was expressed about the priority given to residential development in Guideline 1 over commercial and industrial development.

1.3 Shire of Roebourne (Discussions)

- . Concern was expressed that the proposed Coastal Planning Committee would restrict the power of the Shire over its coastal areas.
 - . If Guideline 2 was imposed literally, people could cause despoilation of private and leased properties in gaining access to the coast.
 - . Offshore islands which have been reserved, especially the Dampier Archipelago, need a management plan which should be prepared by the Western Australian Wildlife Authority in consultation with the Shire.
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2. CARNARVON SHIRE COUNCIL (Discussions)

- . Carnarvon Shire is forward looking in terms of coastal management as it relates to regional planning. The Shire is considering the future development of the coast in terms of a three kilometre Coastal Zone which incorporates potential future recreational, industrial and commercial needs. Sensitive areas are tentatively identified and a pattern of future access and use is proposed.
 - . Specific problems such as the management and control of popular tourist areas and pastoral leases were discussed at some length. In this regard lack of funds and difficulties in controlling coastal areas not vested in the Shire were mentioned.
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3. IRWIN SHIRE COUNCIL (Discussions and Public Meeting)

- . Coastal management was again raised by the Shire of Irwin in the context of regional planning and the problem of management control over the coast highlighted.
 - . Off-road vehicles continue to pose problems of management and control and are progressively becoming more frequent users of the coast.
 - . The need to further educate the public in their use of the coast was highlighted and the concept of public meetings with slides, films and brief informative talks during the summer season was put forward.
-

4. GREENOUGH SHIRE COUNCIL (Discussions)

- . Greenough Shire Council generally agreed with the need for coastal policies and management, but emphasised the need to work through and with the Local Government Authority.
 - . The need to promote education and communication (particularly between Government Departments and Local Government) was again highlighted.
-

5. GREENOUGH REGIONAL ADMINISTRATOR (Discussions)

Discussions were held with several Regional Administrators concerning the regional implications of the EPA's coastal management proposals. The comments below, which have been checked with the Greenough Regional Administrator are a fair summary of the points raised in these discussions.

- . The vesting of Crown Land was raised as being a key issue. There needs to be a direct delegation of authority so that these areas can be effectively managed, a specific example being the control of off-road vehicles.
- . Thought should be given to vesting coastal lands in a 'Regional Council' rather than a single Local Authority. The aim of such an approach would be to balance out any vested interests. Alternatively the responsibility for formulation of management plans for coastal lands could rest with a regional body.
- . The problem of off-road vehicles (ORV's) and the need for special areas to be set aside was further discussed. At least one bad accident has already occurred on a Geraldton beach because of ORV misuse.

5. GREENOUGH REGIONAL ADMINISTRATOR (Discussions) (Cont'd.)

- . In the context of regional decentralisation of decision making the composition and structure of the suggested Coastal Planning Committee was queried. It was felt that this was yet another Perth based committee. Thought should be given to decentralisation of the process of coastal management on a regional basis as an integral part of the overall concept of regionalisation.
 - . The need for research and study into the relationship between the land and near-shore waters was noted.
 - . In conclusion the important role of public education and communication was highlighted, both the idea of informal public meetings and the more structured seminar situation aimed at those responsible for managing the coast.
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6. TOWN OF GERALDTON (Discussions)

- . As far as the Town of Geraldton is concerned the key issue in coastal management is obtaining control over coastal reserves (presently unvested).
 - . Another area of concern was the difficulty in obtaining "expert" advice on problems of coastal management; eg., coastal erosion in areas around Geraldton.
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7. ALBANY SHIRE COUNCIL (Discussions)

- . The Albany Shire Council generally supported the EPA's approach and was particularly interested in how it could be applied at the practical level to effectively manage local areas.
 - . The Shire is particularly concerned with areas such as Cape Riche and Cheyne Beach where good access is available to beautiful locations. They queried how best to plan for these and similar areas to be used by the many visitors and yet retain the natural beauty. Coastal management on a regional basis with priority for use of certain areas where management could be affected was seen as important.
 - . The question of the lack of funds and resources for coastal management was emphasised.
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8. RAVENSTHORPE SHIRE COUNCIL (Discussions)

- . The Shire Council requested that it be consulted in the formulation of any management plans in its coastal area.
 - . The importance of regional representation of local people was pointed out.
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9. ESPERANCE SHIRE COUNCIL

Esperance was sympathetic to the EPA's approach especially the idea of adopting planning schemes to implement coastal management objectives. It was felt that through such schemes undesirable development could be prohibited or restricted.

10. SURFCASTING AND ANGLING CLUB OF W.A. INC. (Talk)

- . The above club organised a meeting at which representatives of most similar clubs in the Metropolitan Area were present. As might be imagined, most of the discussion centred on the right of access to the coast and the future use of four-wheel drive and off-road vehicles.

An important point raised was the important role that this type of club can play in acting as a responsible user of the coast.

Cooperation and liaison with Local Government Authorities within whose areas these clubs were operating was also felt to be important.
