

GREAT OCEAN ROAD ACTION PLAN

Be careful what you ask for!

The Victorian government intends to establish a new government institution, the **Great Ocean Road Coast and Parks Authority**, to take over planning and land management responsibility along the Great Ocean Road.

Though co-ordination and planning improvements for the Great Ocean Road region would be sensible, and consistent management of the many small reserves along the coast would be very useful, a take-over of the management of our major national parks and marine parks is complete overreach.

It would mean duplicating the skills and expertise of Victoria's dedicated park management agency, Parks Victoria. It would be an institutional land grab of some of our most precious natural areas, and set a dangerous precedent, potentially undermining national park management across the state.

While the proposed new park authority would contract Parks Victoria to implement management actions, all management decisions and prescriptions for the national parks would be made by the new authority.

Importantly, the perceived problem or issue with national park management that would necessitate such a drastic move has not been identified, let alone stated. We don't believe that problem exists.



Twelve Apostles. National Parks have successfully protected around 80% of the Great Ocean Road. Photo: Unsplash/John Burnett.

A SUMMARY OF THE FLAWS IN THE SCHEME

The Great Ocean Road Coast and Parks Authority, as currently proposed, has some serious flaws:

- It sets up a duplicate park management agency along the Otway coast, necessitating a duplication of park management expertise.
- It would be a dangerous precedent to set for the rest of the state's parks.
- Co-ordination of management objectives along the coast can be easily achieved through existing planning and park legislation.
- It re-institutes a 'purchaser/provider' model for park management along the coast. This model was a failed experiment in park management which the current government finally ended in late 2018. Why is the government so keen to re-introduce that failed management model?
- National park management is not the problem along the Great Ocean Road – indeed it is the parks that have successfully protected the landscape for many years. The problem the authority should be concentrating on is the many small reserves and committees of management, as well as planning guidelines for private land ... and ensuring our parks get the funding they need.

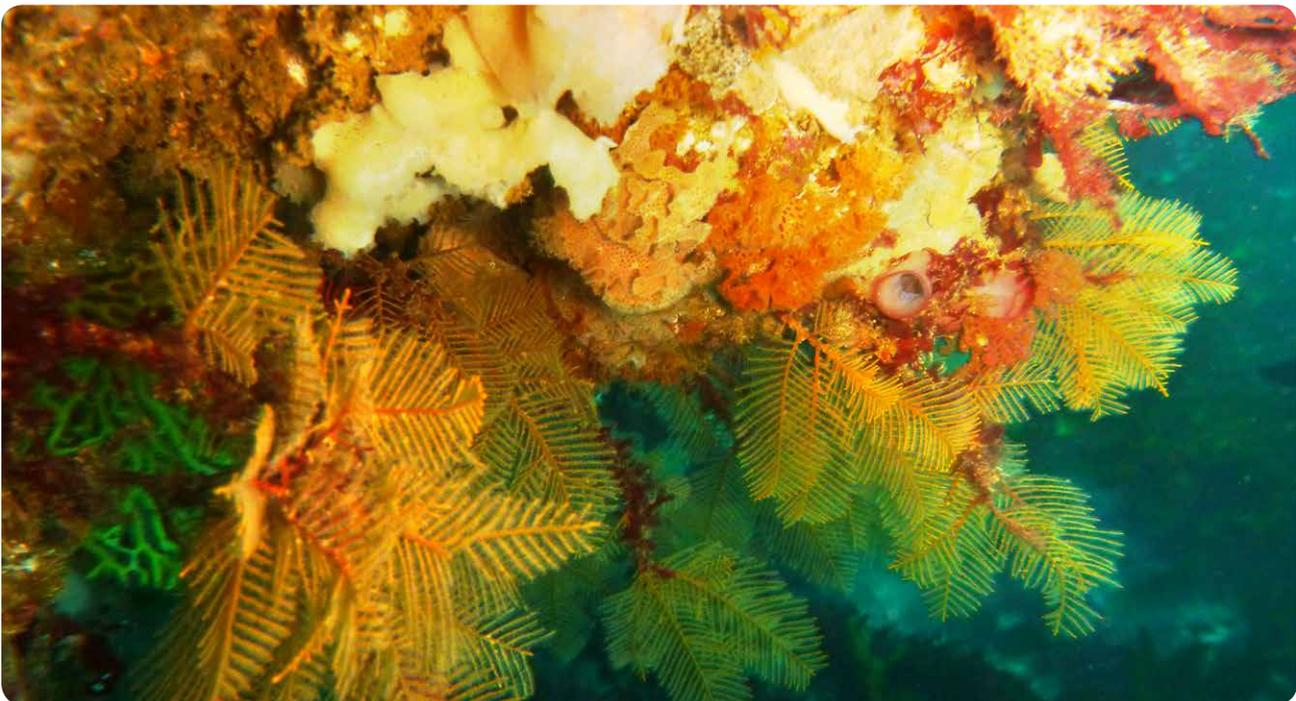
AN INSTITUTIONAL LAND GRAB

Putting the responsibility for the protection of some of our great national parks under a new overriding authority undermines the integrity of Victoria's park system, and the areas they currently protect. It would set up a second national park planning and management body, wastefully duplicating park management expertise. It's a model that has been tried, and it failed.

It may be a good idea to have a planning or coordinating body in place that will protect the Otway coast for many years to come, ensuring long-term protection for:

- the natural landscapes along the route, and the remarkable native plants and animals that live along the Great Ocean Road,
- a healthy tourism industry, offering the best visitor experiences the area can offer, and
- vibrant and liveable places for residents along the coast and hinterland.

But this is a national parks land grab. It seeks to fundamentally change time-honoured protections under the *National Parks Act 1975*, and effectively fragments management of Victoria's national park estate.



The notion that there should be a new management authority for Twelve Apostles Marine National Park and other marine reserves along the coast is particularly odd. No compelling justification for such a change has been given to the public. Photo: Marg O'Toole.

Parks and reserves likely to be impacted include at least 15,000 hectares of national parks, coastal parks, marine national parks and sanctuaries along the Great Ocean Road, including:

- Port Campbell National Park (1,830 hectares)
- Point Addis Marine National Park (4,600 hectares)
- Twelve Apostles Marine National Park (7,500 hectares)
- The Arches Marine Sanctuary (45 hectares)
- Bay of Islands Coastal Park (950 hectares)
- Unspecified parts of Great Otway National Park, but including the Otway Lighthouse and camping areas.

Marine national parks have been established to protect marine biodiversity. Their management also requires a considerable body of expertise and experience. It is a particularly odd aspect of this proposal that these small but critically important marine parks are targeted for a management takeover, while the rest of the marine areas along the coast are ignored.

Who and what protects the coastline currently?

Remarkably, around 80% of the Great Ocean Road's coastline is already protected in national parks and similar reserves, under a strong National Parks (NP) Act. That law gives clear priority to the protection of the landscape and its remarkable native plants and animals in places like Great Otway National Park and Port Campbell National Park, and gives similar protection to a few smaller parks listed under the

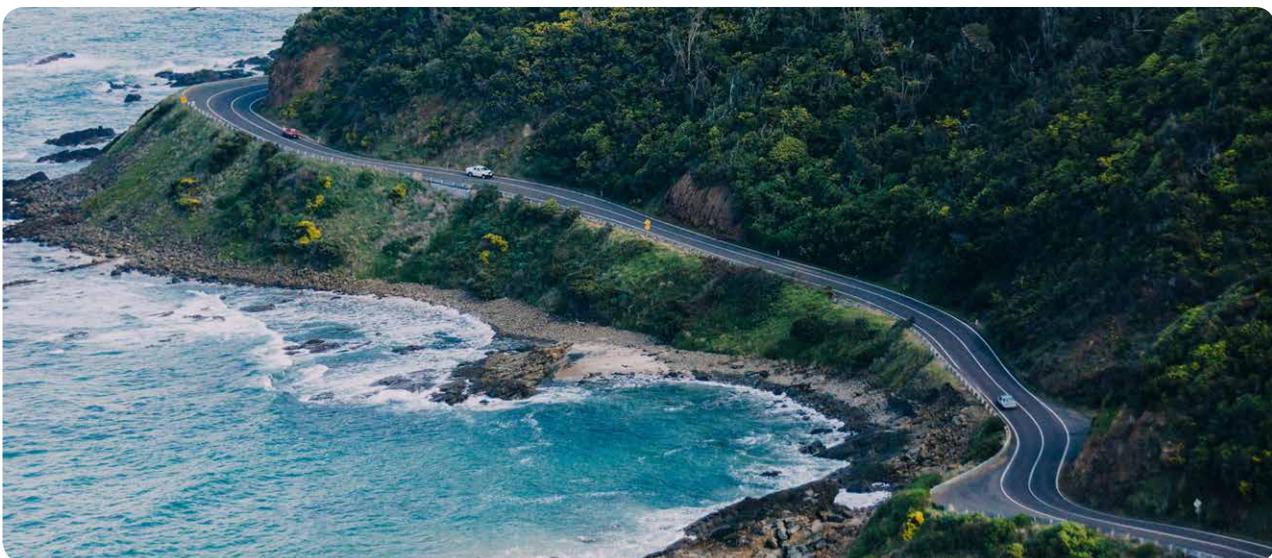
same law. The NP Act also allows for visitor access and memorable visitor experiences, so long as the natural areas and ecosystems are protected.

The rest of the coastline, though it consists of around 70 small parks and local reserves, is a relatively small 20% of the coast. These reserves are managed by a great hotch-potch of management committees and local and state government agencies. It is mainly this collection of small reserves, with their confusing array of land management objectives, that makes co-ordinated and focused planning along the Great Ocean Road difficult to achieve. This is where the management problem lies – not within the national parks!

A SHORT HISTORY OF NATIONAL PARK PROTECTION

What does Victoria's National Parks Act do?

The NP Act has been a strong and effective law since 1975. It gives its strongest protection of the natural environment to both national and state parks, as well as to marine national parks and marine sanctuaries. It obliges the Victorian Government (and all of us!) to protect native plants and animals in the park (not just threatened ones), the natural landscape, cultural sites and areas of scientific interest. It requires invasive plants and animals to be controlled or eradicated. And it provides for these areas to be available for the public to enjoy, as long as activities are compatible with the parks' protection.



Visitor experience planning is necessary along the Great Ocean Road, but a takeover of national park management isn't.
Photo: Unsplash/ Weyne Yew.

When the Act was first proclaimed, the 'Director of National Parks' had clear responsibility for making these things happen; he or she had to prepare a management plan for each park that made sure the protections demanded by the Act were being achieved.

But then...

The beginning (oops!) of the 'purchaser/provider' model

In 1998, thinking that our parks would be better managed under a mock commercial arrangement, the government of the day wrote a new administrative structure into national park law. Victoria's environment department (now DELWP) would hold responsibility for the National Parks Act, but it would contract a new government agency, Parks Victoria, to do the park managing.

This system was known as the 'purchaser/provider' model, and it had some serious flaws. There soon grew a confusion of responsibility between the two government agencies, and in their accountability to the Environment Minister. It also meant there was a need for duplication of park management expertise between DELWP and PV. Over the next 20 years, planning and management capacity actually declined in both agencies, with neither agency clearly responsible for developing the necessary funding and expertise.

Most problems Parks Victoria has today can be traced to the failure of the purchaser/provider model.

Has that park management flaw been fixed?

Yes, it was fixed recently. In 2018, full responsibility for planning park management, and for implementing it, was handed to Parks Victoria under a revised Parks Victoria Act. That law has created a strengthened Parks Victoria that:

- has direct land management and conservation protection responsibilities for parks under the National Parks Act and also for the many other reserves it manages
- must prepare its own management plans to ensure the obligations of the National Parks Act are achieved
- is directly accountable to the Environment Minister.

And under a new 'Statement of Obligations' from the Environment Minister (released late in 2018), Parks Victoria must:

- employ 'adequate senior scientific staff ... to support evidence-based park management'
- adopt a 'whole of landscape approach... and work collaboratively with other land managers'
- work with the minister to 'enhance visitor access to parks ... and stimulate Victoria's visitor economy', and
- avoid duplication of effort.

These obligations are new; they are carefully framed and should be given the chance to be fully effective. The 2018 move at last ended the deeply flawed 'purchaser/provider' model – or so we thought!



Visitors and locals come to the Great Ocean Road area because of its long history of protection of the natural environment. Photo: Mary Ferlin.

Should we reintroduce the flawed governance model?

No, we shouldn't. And we certainly shouldn't change current park management arrangements until the new management model has been given a chance to work. Parks Victoria is already showing improvements in management, and these improvements are continuing.

The proposed Great Ocean Road Coast and Parks Authority has some good aspects, but splitting responsibility for national park management definitely isn't one of them. In particular, it is proposed that the new authority would take on planning and management responsibility for all of Port Campbell National Park, all of the Twelve Apostles Marine National Park, and the coastal part of Great Otway National Park and more. It would then contract Parks Victoria to implement the management actions. That's a return to the failed management model.

Are there other planning processes that can help protect the Great Ocean Road?

Yes ... indeed there's quite a good one. As recently as 2018, under a revision of Victoria's Planning and Environment Act, an area of concern can now be declared a **"Distinctive area and Landscape"**. The purpose of a declared area is to create a framework for future use and development of land, and to ensure the conservation of the distinctive attributes of the area. The planning provisions would set a vision for the next 50 years, and overlay all private and public land.

To qualify as a 'Distinctive area and Landscape' an area must have:

- Outstanding environmental significance
- Significant natural landforms
- Cultural heritage significance
- Significant strategic infrastructure

And the Planning Minister must be aware of potential threats to that landscape.

That's a good fit for the Great Ocean Road.

Under that scenario, Parks Victoria must have regard to 'statements of planning policy' for the landscape. In some instances that policy could be mandated on Parks Victoria, but only if it was consistent with the National Parks Act. Importantly, Parks Victoria would remain responsible for both park planning and management.

The Surf Coast area, at the eastern end of the Great Ocean Road, has already been declared a Distinctive Area and Landscape, and development of planning policy for the area is in progress.

SO WHAT'S WRONG WITH THE GREAT OCEAN ROAD AUTHORITY PROPOSAL?

For a start, most of the things it plans to achieve can be done under existing laws, as indicated above.

The most serious flaw is the proposal for the Authority to operate as a duplicate management and planning body over our national parks, currently managed by Parks Victoria.

The proposed Great Ocean Road Coast and Parks Authority would assume planning and management responsibility for Port Campbell National Park, Point Addis Marine National Park, Twelve Apostles Marine National Park, The Arches Marine Sanctuary, Bay of Islands Coastal Park, and parts of Great Otway National Park, and then contract Parks Victoria to manage that land accordingly. It would effectively take statutory responsibility for our precious parks away from Parks Victoria.

It would also mean that the new authority would need the necessary expertise to plan the management of around 110,000 hectares of important, but very vulnerable, nature conservation land. That would be a significant, and completely unnecessary, duplication of park management expertise.

This discredited model has not been adopted for any other national parks in Australia, and sets a dangerous precedent for the management of our most important conservation areas in Victoria and, indeed, for the rest of the nation.



National parks secure protection for all environmental and cultural features, including Indigenous heritage.
Photo: Mary Ferlin.

HOW CAN WE BEST SECURE LONG-TERM PROTECTION FOR THE GOR?

1. The Great Ocean Road should be declared a **'Distinctive Area and Landscape'**, establishing long-term planning protection for the entire GOR landscape.
2. **A Great Ocean Road Coast Authority** should be set up to guide the management of the GOR Distinctive Area and Landscape, and in particular to oversee the management of the many small reserves along the coast that are currently managed by an assortment of committees and/or local councils.
3. An integrated land use plan for the region should be developed, which covers both public and private land, using existing tools in the planning system. This should be the prime focus of the new Authority.
4. Parks Victoria should be adequately funded and resourced to plan and manage the parks and reserves it is currently responsible for, consistent with objectives of a GOR Distinctive Area and Landscape. Parks Victoria's responsibilities have already been well established in law under obligations set by Environment Minister, and they fit a new Distinctive Area and Landscape scenario well:

"Parks Victoria must work to be a best practice park management organisation, striving for excellence in protecting and managing Victoria's outstanding system of parks and reserves, engaging and working effectively with Traditional Owners, other land managers and the broader community, providing high quality opportunities for visitors to enjoy the parks and reserves, and contributing to the state's visitor economy."

The apparent problem that requires such a desperate solution – taking responsibility for national park management away from the body established specifically for that task – *has not been identified!*

What Parks Victoria needs is appropriate funding to do that job, not a duplicated management structure. Currently, its total funding to manage all its parks across Victoria is less than 0.5% of the state budget, yet it returns many times that expenditure in tourism revenue. Just a small increase to around 1% of the state budget would generate even more tourism revenue, and protect our finest conservation reserves in the long term.

FURTHER INQUIRIES:

VNPA: (03) 9341 6500

Matt Ruchel
Executive Director
mattruchel@vnpa.org.au
0418 357 813

Phil Ingamells
Park Protection
philipi@vnpa.org.au
0427 705 133



Why duplicate management expertise and authority for our terrestrial and marine national parks?
Photo: Marg O'Toole.