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(submitted via [website](#))

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Draft Port Development Strategy 2055

Thank you for the opportunity to provide feedback on the Draft Port Development Strategy 2055 for the Port of Hastings.

For decades, Environment Victoria and the Victorian National Parks Association (VNPA) have been fighting to protect Western Port alongside local community groups. We are concerned about increasing pressure on Western Port, including from the proposed Victorian Renewable Energy Terminal (VRET) and other potential developments at the Port.

### **Vision and key strategies**

We welcome the inclusion of 'Recognition of the value of the Western Port environment' as one of the five key strategies underpinning Vision 2055 (p61). This is appropriate given Western Port's global significance as a Ramsar-listed wetland and UNESCO Biosphere Reserve, as well as the Marine National Parks and other environmental values within the bay.

Western Port is also vulnerable. Potential consequences from petroleum spills are particularly high due to the bay's rapid tidal movement. Contacts, collisions and groundings are all common marine incidents, particularly at berthing and loading. With shipping movements projected to more than double from 150 to 350 visits annually, this is of particular concern.

The key strategy states that 'Development is planned sensitively and balanced to maintain the 'wise use' of the wetland'. Given the plans for continued expansion in terms of land use, intensity and shipping movements, the Port should articulate the limits of intended expansion and present evidence as to how this usage is consistent with 'wise use.'

The resilience of the physical and biological systems in which infrastructure is situated is a key element of climate resilience, particularly for coastal infrastructure like ports. It would be consistent with the port's objectives to not just manage the environment but actively seek out opportunities to improve its health. This key strategy should therefore be strengthened by emphasising a proactive approach to environmental stewardship.

The high conservation significance of Western Port requires any port strategy to have detailed understanding of risks and a clear, well-resourced plan to mitigate and respond to any increase of risk from ship traffic. Research commissioned by VNPA and the Westernport and Peninsula Protection Council in 2013 shows that most high-value conservation areas could be impacted within less than six hours of a spill. Those areas include Phillip Island Nature Park, home to colonies of little penguins, and French Island Marine National Park which provides critical roosting, feeding and wading areas for waterbirds.

Two other expert reports have highlighted that internationally significant birdlife would be put at risk from oil spills, dredging, land clearing and vessel wash. Seabirds such as little penguins, cormorants, grebes and hooded plovers, along with seagrass, mangrove and saltmarsh habitats, [could be seriously impacted](#).

We note that the Port intends to seek opportunities to support the decommissioning of rigs in the Bass Strait (p64). This is a significant initiative that warrants more information in the Strategy. We note that the [2023 KPMG study into offshore oil and gas decommissioning sites for the Department of Industry Science and Resources](#) identified that the Port of Hastings is not suitable for decommissioning activities due to noise, smell and other impacts on nearby communities. These activities would also be difficult to conduct concurrent with offshore wind staging.

The section 'Recognising the Western Port environs' (p74) states that the Port of Hastings' operations and environmental values have coexisted with 'a synergy' for 150 years. However, the reality is that over the past 150 years Western Port has incurred ongoing degradation, severe dredging and loss of habitat. This is not synergy. While we do sincerely commend the Port's present recognition of the need to be a best practice port operator, there are ongoing consequences to past practices that should be acknowledged and tackled.

In this section of the Strategy it would also be useful to cite particular examples of environmental management by ports worldwide (as referred to in the document) that the Port of Hastings aspires to. In addition, we suggest citing best practices that will deliver better outcomes for the environment and the Port, such as the World Association for Waterborne Transport Infrastructure (PIANC) 'Working with Nature' approach.

## Implementation

The implementation approach (pp78-79) does not address climate resilience, despite this being identified as a key part of the vision. This would sensibly fit into the medium-term focus on optimising. The approach also suggests that 'Monitoring environmental impact' could include investment in environmental recovery but the wording is unclear. We suggest that this be reworded to include acting on opportunities to improve the environment, beyond just monitoring. Similarly, 'Connecting with the community' should include not only 'understanding' people's needs, concerns and aspirations, but responding to them too.

We note that the 'Implementation plan' (p81) does not include any initiatives that address the key strategy of 'Recognising the value of the Western Port environment'. It would make sense, for example, to include a land use planning initiative to identify areas for environmental restoration or improving climate resilience.

We would be pleased to discuss this feedback in more detail should you wish. Please contact Kat Lucas-Healey, Senior Climate and Energy Advisor at Environment Victoria on 0404 571 605 or [k.lucashealey@environmentvictoria.org.au](mailto:k.lucashealey@environmentvictoria.org.au) to arrange a meeting.

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