

NSW Coastal Reforms
Submission by Andrew D Short
29/2/16

I like and support the proposed NSW Coastal Reforms including the new Coastal Management Bill. I cannot fully comment of the Manual until it is released in its entirety.

My comments below relate to

- the inclusion of coast 'dunes' and beach 'safety' in relevant parts of the Bill;
- questions about the mapping process;
- directions in the new Manual as to how the new programs are presented.

Coastal Management Bill 2015

Explanatory note

Part 2

No mention of beaches and dunes, which represent 60% of the NSW coast

The four areas - wetlands, vulnerability, environment and use all overlap, its all seems rather repetitive, and still no mention of beaches and dunes – the most widespread and vulnerable part if the open coast.

Also no seaward and landward boundaries to the coast. How far does it extend in these directions?

In short a rather complex uninformative definition of the coast zone.

Also no mention of 'management objectives' as per title of Part 2.

Coastal Management Bill 2015

Part 1 Preliminary

Suggest add words in *italics*

3 (b) add '.. maintain public access, amenity, use *and safety*, and "
comment: public safety is paramount on our very hazards beaches

4 Definitions:

4 (1) beach: Good definition. I assume the landward extent of the beach fluctuation zone includes the incipient foredune and extends to the base of the established foredune.

'composed of sand *or coarser* sediment'

comment: similar sediment is sand, therefore- redundant

coastal hazards means the following:

add: *dune erosion*

add: **coastal vulnerability**

add: **dunes** an area of wind deposited sand that accumulates in lee of the beach and is usually be vegetated by dune vegetation

estuary is defined but not **wetlands**

littoral rainforests are not defined

Part 2

Public safety is paramount on our beaches and should be part of the Bill. Also coastal dunes are not only the site of much coastal development, but in some areas are migrating inland posing a hazard. They should be defined and mentioned in the bill.

Suggested edits in *italics*

6 (1) why are coastal wetlands and littoral rainforests singled out, but not coastal dunes and other types of coastal vegetation?

6 (2) should also apply to coastal dunes and other coastal vegetation types.

7 (2) (d) add 'to maintain public access, amenity, use *and safety* of beaches and foreshores'

8 (1) not mention of beaches and dunes, which comprise 60% of the NSW open coast

8 (2) (e) to maintain the presence of beaches, *dunes* and foreshores

8 (2) (f) 'to maintain public access, amenity, use *and safety* of beaches, foreshores, headland and rock platforms'

9 (1) add *beaches and dunes*

Part 3 NSW Coastal management programs and manual

Good

Part 4 NSW Coastal Council

I support the establishment of the new NSW Coastal Council as outline din this document.

Part 5 Miscellaneous

29 (a) "unreasonably limit or be likely to unreasonably limit *beach amenity*, public access"

Explanation of intended effects

p.10 Coastal management areas

I find the approach to mapping the coast rather confusing and not logically nor comprehensively organized. It is in part based on two of many coastal ecosystems (wetlands and rain forests), then on coastal processes (vulnerability), next on 'coastal environment', which seems just to include wetlands again, and finally on landuse. Nowhere is the actual coastal line - headlands, beaches and dunes actually mentioned or apparently mapped as a unit.

Mapping of the coastal zone should be based primarily on coastal geology and elevation, both of which are available for the NSW coast. The coastal geology including the Quaternary geomorphology will delimit all geomorphic systems, including wetlands, which can then be overlain with their associated ecosystems, including wetlands and rain forests. This will cover Coastal Management Areas 1 and 3.

The geomorphology in combination with a high-resolution Lidar elevation mapping will identify areas prone to inundation and can include beaches and bluffs prone to erosion (Coastal management Area 2)

Coastal Mapping Area 4 landuse can then be overlain on the above.

In summary the mapping should be sequentially based on:

1. Elevation
2. Geology/geomorphology
3. Ecosystems
4. Coastal landuse
5. Based on the above coastal vulnerability, which should be a combination of hazards + landuse.

p.10 Mapping coastal management areas

See above

Question 1 Yes, councils should be able to propose changes

Question 2 again a more comprehensive approach to coastal ecosystems, not just wetlands and rain forests is required.

Question 6 & 7

The development controls should include reference to **beaches and foredunes**, which require both buffer zone (e.g. no construction on beaches or foredunes) and set back behind the foredune depending on shoreline stability.

Development controls should also extend to coastal **headlands** which where possible should not be developed owing both the cliff hazards and the fact that development will degrades the beach amenity including view-scape.

Coastal use areas should be 1 km +/-500 m based on local attributes

Question 8 & 9

Dot point 2 There will be cases where new development may have to “exceed the scale and size of exiting building”. The existing clause could unnecessarily lock parts of the coast in a 1950’s type development and quarantine some forms of appropriate new development.

Coastal Management Manual

With regards to the 4 types of coastal management areas I find this approach to the ‘management areas’ confusing and selective. I would prefer to see a more systematic and logical approach to mapping the coast and its management areas, as outlined above.

I agree with the 5 stages in developing a CZP.

In 2016 the existing CZMP’s being prepared for councils have got out of control, they are very large (several 100’s pages), contain a lot of unnecessary and repetitive material, and somewhere buried in them is an ‘actual’ plan. The new manual should direct councils on how to prepare a brief, succinct, easy to follow and useful programs. At Stage 4 council’s should be directed to stick to the dot points outlined in this stage and leave out all the ancillary material that presently clutters the existing plans.

I agree with stage 5, not only the implementation, but also the monitoring and reporting, which are particularly necessary in an era of changing climate and related processes.