

Please find below my submission of the Proposed NSW Coastal Reforms Part 2 :

I strongly object to the stage 2 reforms and believe it will have a very damaging effect on many coastal communities in NSW.

These proposed reforms are the exact opposite of what the Liberal Government in opposition promised before they were elected.

The proposed reforms build upon and are worse for coastal communities and landowners than the terrible legislation brought in by the previous Labour Minister Sartor in a deal done with the Greens and at the time widely and strongly criticized by the Liberal opposition.

When Rob Stokes was initially appointed Minister of OEH he made many statements indicating his intentions to allow for and provide for protection of properties and communities.

What has come out of OEH now as proposed legislation is exactly the opposite - the Greens policy and Labour supported **Planned Retreat** is the primary objective. Clearly as case of ' Yes, Minister ' going on here with the Green ideology permeating the staff in OEH pushing their own political view rather than the stated view of the Government.

For example , the proposed Cost Benefit Analysis is clearly flawed and arguably 'rigged' to produce outcomes in favour of Planned Retreat - this was seen recently in Byron Bay with OEH trying to overturn a CBA produced by commercially recognized experts by attempting to insert their new (as yet unapproved or legislated) guidelines for CBAs to try and achieve an outcome in favour of Planned Retreat rather than the recommended Protection that was the initial recommendation of the commissioned CBA. Loss of valuable beachfront land was proposed to not even be considered a cost/ loss unless the owner resides in the property permanently but the fact they no longer have to pay land tax is counted as a benefit - this is illogical, unfair and simply not supportable. There are other examples of why this process was unfair and simply designed to achieve a pre-determined outcome.

The public consultation process has been so flawed as to leave the government exposed to legal challenge in the future. It appears to have been designed to get the minimum feedback possible and again simply push a predetermined outcome.

I am a beachfront landowner at Belongil Beach , Byron Bay, NSW. An erosion hotspot but a hot spot because of land reclamation and rock protection in front of the Byron township. These works have been scientifically proven over many decades and my many experts engaged by Council, the State and local landowners themselves, to be the cause of the erosion at Belongil where I live. The protection works in front of the township have been determined to remain but new legislation would make protection from the damage caused by these works almost impossible. There can be no justification for such policies that protect some at the expense of others.

New legislation needs to take account of the existing impacts of man made structures and allow protection from such impacts. It also must differentiate between greenfield sites and those that are already developed and have significant infrastructure , business and residential landholdings.

Emergency works allowed under existing legislation , which are already ineffective and should be upgraded , are to be removed totally. How can a government realistically propose no emergency protection for homes, businesses and valuable infrastructure that already exists ?! If the government doesn't want private land in these positions it should

compulsorily acquire it at full market value before such reforms are introduced and significantly reduce valuations.

Beaches are placed far ahead of private land holdings and other community infrastructure in the proposed approach. Planned Retreat in already developed communities is an impossible idealistic dream and there are many technologies and approaches, validated the world over, that will provide cost effective protection and also retention of beaches. The impacts and real costs of Planned Retreat in developed communities will simply be too expensive and too catastrophic to be implemented over a reasonable planning period. Ultimately sea level rise may possibly require different approaches but that is a long way out and it is far too early to be sacrificing our coastal communities at this time.

Coastal planning is too complex and important an issue to be left to small, under resourced and politically motivated local councillors and staff without the expertise to consider such issues. The State Government is proposing to delegate most of the power to local Councils and abrogate its own responsibilities. In fact, the issue is of sufficient importance to the whole country that a nationally co-ordinated and supported approach should be considered as proposed by Federal Minister Hunt.

The proposed reforms will mean that local plans can be changed easily and often as local politics change. The stakes are too high for such an arbitrary approach to planning for such a significant issue. The State Government must remain responsible for a whole of Coast approach, clear guidelines to Councils and overall approval responsibility.

The proposed changes to land title boundaries to move in line with recession are also unreasonable and particularly so without compensation.

The NSW Government should go back to step one and start again with fair and appropriate high level principles and objectives and with far improved community consultation.

Please confirm receipt of this submission.

Regards,

Bob Watson

