

**From:** [REDACTED]  
**Sent:** Thursday, 25 February 2016 3:27 PM  
**To:** OEH PD Coastal Reforms Mailbox  
**Subject:** Submission - Ian Carruthers (Avoca Beach)

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

The proposals set out in the draft package presenting the Stage 2 Coastal Reforms are excellent. I have two points to raise.

(1)The approach laid out is strong in dealing with planning to achieve resilient coastal communities, assets and environments, including a basis for setting asset lives and allocation of costs between parties for protective measures - that is important.

But I did not see any reference to who carries the risk and costs when inevitably there will be some degree of damage from future extreme oceanic climate events. This is especially important given the scale of assets at risk; and given that residential building insurance (and presumably other categories of asset insurance) mostly makes an explicit exclusion for insurance cover in event of actions of the sea; and there is no insurance cover for erosion of land. Without clear statutory guidance up front there is a real risk that those suffering damage and not being able to receive an insurance payout will look to the State government and local governments for compensatory payments.

To address this risk to governments I believe the planning framework should explicitly cover this issue; and there should be a community information program that includes providing asset owners with an understanding of who bears the cost in event of damage by the sea.

(2) The draft material addresses options for measures to reduce risk of coastal hazards. I did not see (that perhaps my oversight) reference to options that would be included as part of Development Control Plans for building approvals eg deep pile construction, set backs etc. These are important.

Thanks for the opportunity to comment. Please put me on your mailing list for updated materials as the process advances.

Ian