

**Coastal Reform Team,
Office of Environment and Heritage
PO Box A290 Sydney South.
NSW 1232**

Dear Coastal Reform Team

Thank you for the opportunity to comment on the proposed NSW Coastal Reforms.

As a resident of Orient Point on NSW South Coast, I appreciate the opportunity to comment on proposals that are likely to have a major longterm impact on our precious coastal environment and the wellbeing of coastal communities.

We are very fortunate to live in such a beautiful and relatively undisturbed environment surrounded by Lake Wollumboola and the Crookhaven River and estuary, our stunning surf beaches and coastal forest. I want to see this unique environment maintained and protected to ensure that the current landscapes and the exceptional biodiversity it supports will be retained for its intrinsic value, but also as the foundation of the future social and economic wellbeing of our community,

However I am concerned about existing and increased development and population pressures that, combined with the impacts of climate change, including sea level rise and increased storminess, threaten our coastal ecosystems.

There are aspects of the draft Bill, the associated State Environmental Planning Policy (SEPP) Statement of Intended Effect and draft Coastal Management Manual that are positive, although I also have concerns that I trust will be addressed in later stages of the reform process.

I welcome the following features of the Coastal Reform package;

- The Coastal Reform Package represents an important commitment by the NSW Government to an ongoing leadership role in policy and strategic planning and management for the coast, in partnership with coastal Councils and communities.
- The new coastal protection laws will bring together both strategic land use planning and management of the coast.
- The principles of Ecologically Sustainable Development are included in the overarching statement of objectives, with objectives committed to protecting and enhancing natural coastal processes and coastal environmental values, including biological diversity, ecosystem integrity and resilience, Aboriginal cultural heritage values and the public's right of access to the coast.
- Existing protections for high conservation value, sensitive coastal environments, are to be maintained and improved, including controls on development within 100 metres of the coastline and more extensive protections for coastal wetlands, littoral rainforests, and foreshores and catchments of coastal estuaries, lakes, and lagoons.
- Coastal Management Areas are proposed with requirements for their planning and management outlined in the proposed SEPP and in the draft Coastal Management Manual.
- Existing and longterm coastal hazards and risks are to be planned for and managed via a detailed risk assessment and management process
- The establishment of NSW Coastal Council.

However there are aspects of the package that concern me and wish to see addressed in the next version of the Bill and other documents. These include;

The proposed Coastal Management Areas.

These should be reconfigured as follows;

- One “Coastal Conservation Area” would bring together all high conservation value, sensitive coastal environments in recognition of the inter-relationship of the physical, hydrological and biological coastal systems, rather than separating Littoral Rain Forests and Coastal Wetlands from other related coastal environments.
- “Aboriginal cultural values” Area, to be developed in consultation with Aboriginal coastal communities.
- “Coastal Vulnerability Area”, covering all coastal hazards with an increased emphasis on coastal inundation and flooding and interaction with coastal floodplain management.
- “Coastal Development Area,” which should include objectives to protect environmental values not included in the proposed “Coastal Conservation Area.”

Absence of maps.

The absence of mapping for the proposed Coastal Management Areas, creates great uncertainty regarding the integrity of the proposed Management Areas and how they will be overlaid, especially when the proposals include reductions for the coastal zone for “Coastal use areas.”

Hierarchy of objectives.

The proposed hierarchy of objectives for Coastal Management Areas is not consistent with the principles of Ecologically Sustainable Development. All of the coastal environment objectives should take precedence over coastal vulnerability and coastal development/use objectives.

State Environmental Planning Policy (SEPP) Statement of Intended Effect

The statement is light on detail. The proposed Areas are based on existing Coastal SEPPs rather than bringing together related highly sensitive environments whilst at the same time providing, ecosystem-specific development controls. Nor does it include provisions for concurrence with Office of Environment and Heritage for approvals.

Coastal Management Programs.

Provisions that allow for Coastal Management Programs to cover particular locations, no matter how small, in addition to “Coastal Management Areas,” are contrary to a longterm strategic approach to coastal planning and management. It is concerning also that development of Coastal Management Programs are not mandatory with Council able to prepare one program for one area only, to satisfy requirements.

Limited focus on planning and management to address climate change, especially sea level rise and increased storminess.

It is concerning that the reforms do not identify the Government as adopting a leading role in addressing the hazards and risks to the environment and community from sea level rise and increased storminess due to climate change. It is important that the Government as well as local councils, adopts a leading role in not only planning and management of such risks, but also in educating and engaging with the community.

The advice of climate change expert scientists, is that the impacts of climate change are already occurring and that the impacts of sea level rise and increased storminess etc will intensify well beyond the current impacts of natural coastal hazards. Yet the proposals do not address strategies for planned retreat or

requirements based on peer-reviewed expert advice regarding broad coastal benchmarks as well as local coastal compartment assessments.


No program to acquire sensitive coastal lands.

Given the significant environmental values and vulnerability of the coastal zone, existing land acquisition provisions should be retained. This provision is especially important for relatively small, isolated areas that may not qualify for inclusion in national parks, yet provide important coastal habitat corridors including those recognised in international agreements for coastal threatened species such as native and migratory shorebirds and sea birds and as well as future support for movement of threatened coastal ecosystems.

I support the detailed submission provided by the Lake Wollumboola Protection Association Inc

Yours sincerely,

Jan Donney


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