



Lynda Newnam

La Perouse Coastcare [REDACTED]

[REDACTED] Matraville 2013

Submission on Proposed New Framework for Coastal Management

Introduction

Thank you for the opportunity to comment on the proposed reform framework and particularly for emphasising that community engagement will be a key feature.

Members of La Perouse Coastcare have been active in contributing to coastal works and awareness for over 15 years. They have been involved in bush and dune regeneration, rock platform and littoral rainforest walks and other awareness raising, clean-ups, water quality monitoring, marine education, and advocacy.

Maintaining and enhancing biodiversity values, sustainability and public access are key concerns as these also relate to existing contamination legacies and ongoing pollution impacts from major industry and State Significant Developments, eg. Port Botany Expansion, Desalination Pipeline construction, Energy Australia Cable as well as major coastal housing developments around the Prince Henry precinct. With regard to the Port Botany Expansion there are issues of compliance with Conditions of Consent (eg. Penrhyn Estuary Draft Offsets – see <http://portbotany.org/2015/10/13/10-years-since-port-botany-expansion-approved/>) and with the EIS process which failed to take account of Climate Change ⁱ

We look forward to contributing further when additional information is available, particularly the details of the four Coastal Management Areas and the most recent data on sea level rise and the approach being taken by Planning.

Interim recommendations:

- Risk Management Approach should be mandated. We don't take a piecemeal -Council by Council -approach to 'Border Protection' and coastal protection from natural hazards should be no different.

- Assessments impacting 149 certificates must be consistent throughout NSW and the process totally transparent.
- Emergency works, eg. erosion, on private property should be managed by landowners not be a responsibility of Council.
- Innovation in identifying and funding priority works is required. Special rates, charges and levies are mentioned as mechanisms to raise funds for coastal management works. However, the community is generally reluctant to accept these charges, particularly when they see the greatest benefit accruing to the most advantaged, eg. those living within walking distance from coastal attractions, special interest groups. Grant schemes are also listed as potential sources of funding. These grants are usually competitive with successful councils likely to be those with staff expertise in the grant process rather than based on greatest need. Collaboration with community, regulators and business as part of the development assessment process could be explored with Offsets and Section 94 contributions better targeted.
- Enshrine the right to ease of public access which is particularly relevant in relation to emergency works.
- Ensure the cumulative impacts of major developments (including projected expansions) are captured in the assessment process by NSW Planning. There should be interactive mapping of the LEP with realistic caps imposed. Rather than unrealistic expectations, landowners and potential investors require certainty. There is also a need to develop detailed sediment budgets in areas classified as Coastal Vulnerability Areas.
- The State Government should undertake studies and assessment required to map the land affected by all coastal hazards (eg. headlands and cliffs) for the current and future timeframes rather than leave this to Councils.
- Encourage ongoing research, particularly Citizen Science as engagement with community provides opportunities to inform a broader audience directly and through the media.
- Provide Key Performance Indicators for community engagement by Councils. A quick check of websites for the three amalgamating councils in this region – Randwick, Waverley, Woollahra – was conducted. Randwick material on coastal management is buried deep in attachments to business papers. Waverley has a web page with relevant information and 2012 studies but no CZMP. Woollahra has a webpage which includes

a Coastal Zone Management Study completed a few months ago plus a clear timeline for consultation for the CZMP. Information for the general reader has to be up front, easy to get to a quick summary and with hyperlinked in-depth information. Coordination between Councils and State agencies is essential. Agencies should reach agreement on common purpose/mission before embarking on community engagement.

- Incorporate reporting/alert systems and ensure ease of access for community. At present there is no integration with and between state agencies and no leadership as such from Councils.
- Details required around the proposed operation of the new Coastal Management SEPP with other SEPPs in particular, the Three Ports SEPP.

If you require any clarification of points or further information, please don't hesitate to make contact.

With regards,

Lynda Newnam

ⁱ In 2006 the Principal Scientist for URS, Matt Coetzee, who oversaw the Sydney Ports Corporation EIS for the expansion had this to say at a conference titled: *Critical Transportation Infrastructure in a Global Warming Future: Protecting NSW Seaports and their Hinterland, Working Paper 2, Report on Workshop Held 25th May, 2006, The University of Sydney*

“Matt spoke specifically on the EIS process for the expansion of Port Botany seaport. He noted that for the purposes of the EIS, spatial and temporal boundaries were tightly defined around the physical infrastructure and less on deeper connections with other structures. The alternatives considered are most often at the scale of the development (ie alternative structural solutions), and if other scales were examined other alternatives might come into play. This was certainly the case with assessing the alternative to develop Newcastle Port instead of augmenting Port Botany. This was rejected because of unsatisfactory transportation links between Newcastle and Sydney, given that the majority of container trade was sourced from or destined to the Sydney Basin. However,

from a climate change perspective, the Newcastle option might have more weight. Impacts that are well defined, quantified and certain are most easy to define mitigation measures for and are therefore the ones that are prioritised for attention. Consequently, impacts of Climate Change are not usually considered in the EIS process. The EIS process focused on assessing the impact of a development on the environment, not that of the peculiarities of the environment on the development.”

The following has been extracted from the Australian Government Publication “About the House”, September 2008: In 2006, the Insurance Council of Australia assessed the number of Australian addresses within three kilometres of the coast and with baseline elevations below four, five and six metres. It estimated that more than 425,000 Australian addresses are below four metres above mean sea level and within three kilometres of the current shoreline. “The potential impacts on the Australian community arising from sea level rise when combined with the current exposures to inland flooding are therefore likely to be significant,” the Insurance Council states in its submission to the inquiry. “It is in this context that the general insurance industry considers that urgent adaptive measures are required. We submit that the significant implications for the Australian economy that flow from this hazard require significant consideration and treatment.”.....
.....Professor Thom raises a series of pertinent questions in his submission, pointing to low-lying areas in Australia he believes could be at risk. “When will barrages be needed at Port Philip or Botany Bay? When will the very low runway at Sydney Airport need to be elevated?