



Ballina Shire Council

Draft Shaws Bay CZMP

Public Exhibition - Submissions Report

October 2014

Prepared on behalf of Ballina Shire Council by Hydrosphere Consulting.

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PROJECT 14-019 – SHAWS BAY CZMP					
REV	DESCRIPTION	AUTHOR	REVIEW	APPROVAL	DATE
0	Draft for BSC review	R. Campbell, M. Howland	M. Howland	M. Howland	7 Oct 2014



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1. INTRODUCTION

Hydrosphere Consulting has prepared a Draft Coastal Zone Management Plan (CZMP) for Shaws Bay (Hydrosphere Consulting, 2014) on behalf of Ballina Shire Council (BSC). The draft CZMP was prepared during 2014 with the following major steps:

- March/April 2014: Data review, investigations and stakeholder consultation (including community survey and public drop-in session 1);
- May/June 2014: Preparation of first Draft CZMP;
- July/August 2014: Council review of first Draft CZMP and Councillor presentation; and
- September 2014: Public exhibition (Final Draft for public exhibition, Hydrosphere Consulting, 2014) and public drop-in session 2.

Four submissions were received during the public exhibition phase. Further details of the exhibition process and the submissions received are provided in the following sections.

2. EXHIBITION PROCESS

At the Ordinary Council meeting of 28 August 2014, Council resolved to place the Final Draft CZMP on public exhibition. The Final Draft CZMP (Hydrosphere Consulting, 2014a) and Volume 2 Supporting Information (Hydrosphere Consulting, 2014b) were placed on public exhibition between 3 September 2014 and 26 September 2014 (3.5 weeks). Public promotion of the exhibited plan included:

- Information on Council's 'Documents on exhibition page';
- Information and downloads on the project webpage www.hydrosphere.com.au/shawsbay;
- Media release – 2 September 2014;
- Interview with radio 2LM; and
- Articles in The Advocate.

3. COMMUNITY INFORMATION SESSION

In addition to the initial session, an information/drop-in session was held at the Ballina Surf Club during the public exhibition phase on 18 September 4-6pm. The Mayor of Ballina, Councillor David Wright, attended the session, as did Council's Engineering Works Manager, Paul Busmanis. During the session, the project team was available to answer questions and Mick Howland of Hydrosphere Consulting presented the draft Plan and then provided further opportunity for attendees to provide comments or ask questions. Approximately 25 community members attended the session.

4. WRITTEN SUBMISSIONS RECEIVED

The four submissions received during the public exhibition period are summarised in Table 1 together with a response to the points raised in the submissions. The submissions are attached in Appendix 1.

5. GOVERNMENT AGENCIES

No government agencies provided a submission on the draft Plan. Aspects of the plan, including actions that directly relating to Crown Lands and Fisheries NSW were discussed verbally with the designated contacts within those departments, and notification of the Plan's exhibition was emailed to those contacts during the exhibition period. It is envisaged that these departments will be involved in the certification process for the Plan, however continued liaison is recommended to ensure continued support from these agencies during the implementation of this Plan.

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Table 1: Summary of Written Submissions

No.	Author	Summarised Content/Points Raised	Response to Submission	Proposed Amendment to Draft CZMP
1	Col Hodgkinson, Hon. Secretary, Titanics Winter Swimming Club	Concern about sandflies and considers chemical spraying to be effective. Considers that the frequency of spraying required is likely to reduce over time as sandfly population is depleted.	While chemical control of midges is expected to be effective, continued application is required and there are risks including toxicity to non-target fauna and flora and the potential for the midges to become resistant to the chemical. Council does not undertake any chemical spraying to control mosquitoes and sandflies at any other locations within the Shire, although options were investigated for mosquito and sand fly control options about 10 years ago. Spraying was determined to be too expensive and not effective enough and Council decided to place controls on development instead. These are detailed in DCP and required buffers, screening of windows and doors, etc. Chemical controls are not recommended for Shaws Bay at this time. Instead, the CZMP recommends an education program to improve public awareness of biological irritants.	Vol 1, s5.10.2 Option 27. Include additional note that BSC have previously rejected spraying and do not undertake chemical control for sandflies anywhere else in the Shire.
		Supports dredging option and would like to include western area of Bay near steps/wall to facilitate increased water exchange.	Noted. The area of dredging to be considered in the recommended feasibility study could easily include an evaluation of this expanded area.	Vol 1, Section 5.6, Option 12, 1 st dot point: modify to include consideration of south-western portion of the Bay.
		Club is happy with facilities (shelter, shed and car access) at Pop Denison Park. Happy to move but requires equivalent facilities in new location.	There are no plans to remove or relocate the facilities at Pop Denison Park. In the long-term, other facilities in other locations may also become available through the expansion of Pop Denison Park.	None
2	Mary Davis, President, Rainbow Region Dragon Boat Club Inc.	The club would like to be considered as a recreational activity at Shaws Bay. Previous correspondence was provided to Council about the need to establish a base for dragon boating and requested new facilities at Shaws Bay.	The proposed management actions at Shaws Bay are consistent with the development of future recreational facilities such as those requested by the club. The CZMP recommends the inclusion of additional facilities at the Pop Denison and Fenwick Drive Public reserves and these areas may be appropriate for the Dragon Boat club facilities. Any proposal for a permanent storage 'cage' should be considered with reference to the overall concept presented in the CZMP and the outcomes of Action 5 (which recommends a that a long-term detailed plan be developed for the Park). Further consultation between the Club and Council is required and the relevance of Shaws Bay would need to be determined once a location (i.e. River or Shaws Bay) at which the club is to be based has been decided.	Acknowledge existing/occasional use of Shaws Bay by the Club in Section 7, Vol 2.

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No.	Author	Summarised Content/Points Raised	Response to Submission	Proposed Amendment to Draft CZMP
3	H. T. (Bert) Carter BE (Civil, UNSW)	General comment	It should also be noted that Mr Carter's opinions have been considered thoroughly from early in the process. Mr Carter attended both drop in sessions and provided input via the community survey. Hydrosphere Consulting's project manager also met with him on site for over an hour to discuss the processes influencing the health of the Bay and specific suggestions raised by Mr Carter.	N/A
		Considers that lack of maintenance of the Bay has allowed it to deteriorate and it is now too costly to implement meaningful measures to improve the situation, particularly the northern reach and main body of the Bay.	Particular issues are discussed below. Although affordability for Council was a consideration in the Plan, value for money and likelihood of success of the recommended actions were considered more important. The CZMP recommends significant expenditure \$1.6m over 10 years to improve the recreational amenity and ecological health of the Bay. The plan addresses key ecological maintenance issues relating to sedimentation and mangroves which are a key focus of Mr. Carter's submission.	None
		Considers that clearing of mangroves along the training wall is required and would be effective in increasing tidal exchange. Questions the claim from the EPS that this section of the wall is relatively impervious.	The Estuary Processes Study (PBP, 2000) states that sand and finer sediment has built-up within and against the wall effectively creating an impervious structure between the western end of the wall and eastern end of the mangroves. The concrete steps also inhibit flow of water into the Bay at this location. It is agreed that sediment and mangrove roots are likely to be contributing to the some reduced flow in this section. It is considered that the mangroves originally colonised this area as a result of initially lower flows through the wall and sedimentation due to low porosity of the wall in this location. To undertake detailed studies to remove this uncertainty regarding wall porosity would incur significant cost. Although, the actual low-level porosity of the wall at this location remains unknown, there is a risk that removal of the mangroves will not appreciably increase tidal exchange with the Richmond River. The cessation of dredging in the late 1980s has allowed accelerated sedimentation which is conducive to mangrove growth. The analysis of aerial photos in the EPS indicates that the mangrove seedlings along the wall were starting to mature between 1980 and 1986. Hydrosphere's analysis of mangrove growth since 2000 indicate that two additional large trees have established eastwards (by 2003), extending the range of mature mangroves by around 15m. A number of smaller seedlings have sprung up in recent years further to the east. These seedlings are included in the recommended area for mangrove clearing. The reasons for not recommending the wholesale clearing of the mangroves along the wall have been trivialised in the submission and complexity of the physical processes	None

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			leading to these issues, have not been acknowledged. Further discussion of specific comments is provided below.	
	H. T. (Bert) Carter BE (Civil, UNSW) (Continued)	Cites the current mangrove clearing permit as evidence of Fisheries NSW being 'very sympathetic' to clearing mangroves along the wall	The mangrove clearing permit does not specifically map the wall as an area where mangrove clearing is permitted, however the wording of the permit does confirm that this area is included. The submission comment has been discussed with Fisheries NSW. It should be noted that the permit was first issued numerous years after these mangroves had become significantly established. The intention of the permit was for the clearance of immature trees, lopping of branches at access points and to prevent the uncontrolled spread of mangroves in key areas. The permit does not cover dredging and reclamation, which would be a key requirement of any <u>effective</u> mangrove removal along the wall. A separate approval for dredging of the sediments and any damage to seagrass would be required. It should also be noted that the correspondence accompanying the issue of the permit states that 'Mangroves are to be removed using hand held tools only' – this provides some indication of the extent of work/degree of impact envisaged by Fisheries NSW when issuing the permit.	Provide additional explanation in Section 5.6.2, Vol 2 (Option 10) to reflect the reasons why mature mangrove removal here is not recommended.
	H. T. (Bert) Carter BE (Civil, UNSW) (Continued)	Does not accept that sufficient information on wall porosity (and longitudinal variations along the wall) has been provided.	It is acknowledged that there is little information to suggest that the nature of the wall (below around -0.3m AHD) in the vicinity of the mangroves is different to elsewhere. The lack of evidence however does not reduce the argument that the effect of mangrove removal is uncertain; in fact it is the lack of certainty that reduces the attractiveness of the wall mangrove clearing option. The EPS findings/discussion are not disputed as: <ul style="list-style-type: none"> • Mangroves colonise areas where sedimentation is occurring within a narrow elevation profile. The colonisation of mangroves at this location, and not further to the East suggests that there was in fact some difference in tidal flow through the wall and sediment build up at this location prior to mangrove establishment. There is a significant probability that simply removing the mangroves and excess sediment at this location will not change the reasons that sediment accumulation and mangrove establishment occurred in this location in the first place; • We are not aware of any specific requirements in the construction of the wall that controlled the homogeneity of the wall construction. It is highly likely that there are variations in wall porosity along its length as result of the relatively coarse construction process. It follows that some areas are likely to be more porous than others; and 	Provide additional explanation in Section 5.6.2, Vol 2 (Option 10) to reflect the reasons why mature mangrove removal here is not recommended.

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			<ul style="list-style-type: none"> The matrix of the wall at that location would have further infilled with mangrove roots and sediment. Removal of this material from within the wall structure would be very difficult and expensive, with no guarantee of success; <p>It should also be noted that porosity of the wall is likely to continue to reduce, as natural processes contribute to infilling of the wall matrix. Such processes include</p> <ul style="list-style-type: none"> Biofouling, where oysters, mussels, barnacles, sponges and the like continue to colonise crevices where any flow occurs; Items such as driftwood, seagrass wrack, litter, etc. continue to get trapped in the wall; and Flood and wave-borne sediments continue to settle in areas where flow is reduced due to these obstructions. <p>These are slow processes, that in part will be mitigated by sea-level rise, however it is not reasonable to expect that flow through the wall will remain unchanged over time.</p> <p>We agreed that reducing further spread of mangroves along the wall is important (should it occur) and have recognised this in the recommended mangrove clearing permit extents.</p>	
3	H. T. (Bert) Carter BE (Civil, UNSW) (Continued)	Questions the reasons for not removing mangroves along the wall: large area, access restrictions, potential destabilisation of the wall, potential damage to seagrass. Questions why cost is considered a key factor in considering options.	<p>It is acknowledged that the mangroves are more difficult to remove in a mature state than as seedlings. However, given our understanding of the sediment dynamics in this area, mangrove regrowth would occur and any sediment/mangrove removal actions would need to be ongoing. Hence, in addition to the high cost of initial removal, ongoing commitment to maintenance is required or significant sediment removal in this area would also be required (which isn't covered by the permit). In addition, as the south-western end of Shaws Bay already receives significant tidal exchange, the benefits of increasing tidal exchange through the removal of the mangroves may be minimal (see above discussion). The uncertainty of the efficacy of this option is a key reason for not being recommended, although there are numerous other reasons that contribute to this position.</p> <p>The potential damage to seagrass is a key consideration as any actions that damage seagrass require compensatory measures (under legislation) which in turn increase the cost of the action, even if it is considered a reasonable action.</p> <p>The CZMP recommends dredging of the main section of the Bay as the best approach to improve circulation and reduce sedimentation throughout the Bay.</p> <p>The mature mangroves along the wall have been noted by members of the community as contributing to the ecological and scenic value of the Bay and the need for removal is not</p>	Provide additional explanation in Section 5.6.2, Vol 2 (Option 10) to reflect the reasons why mature mangrove removal here is not recommended.

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			<p>supported by all of the community. The Plan aims to find a balance between the recreational and ecological uses of the Bay and recommends actions that provide the best value for money. The high cost of removal of the mangroves along the wall is not considered to be justified when other options to improve circulation are more likely to be successful. The Plan recommends maintenance activities (mangrove removal) in areas expected to provide most benefit to recreational pursuits while allowing mangroves to remain in other areas where recreational activities are not preferred.</p> <p>It is acknowledged that gross destabilisation of the wall is highly unlikely if mangrove and sediment removal is undertaken appropriately. This is a consideration for works rather than a primary reason for not recommending this option. It should be noted that to extract mangrove roots and accumulated sediments from the wall matrix itself (in an attempt to increase water flow through the wall) would lead to significant disturbance to the wall structure.</p> <p>Access from the wall itself would be problematic and it is assumed that work would be undertaken by barge mounted machinery. Routes for machinery access and removal of sediment and mangroves have not been fully assessed. A detailed works plan would be required, and approvals for dredging and estuarine vegetation disturbance would need to be secured.</p>	
	<p>H. T. (Bert) Carter BE (Civil, UNSW) (Continued)</p>	<p>Disputes recommendation that there is no alteration of the low tide limitation and suggests that lowering the low tide level by 50mm would have significant influence</p>	<p>It is agreed that increased tidal flushing of the bay would be advantageous for water quality at most times of the year (i.e. outside of floods). Based on the 2013 bathymetry, a lowering of the low tide level by 50mm (i.e. from -0.3m AHD to -0.35m AHD) would be increase the tidal prism by around 4,577m³, which represents an additional 5% for neap tides and 3.5% for neap tides. This is not considered significant and appears to be based on an arbitrary level reduction.</p> <p>The submission is not specific on how a reduction in low tide level would be achieved, but it is assumed that the removal of mangroves and sediment along the wall (as mentioned earlier in the submission) are the suggested mechanism. No new hydrological studies have been undertaken as part of this study, however, based on the information available (and the discussion of processes above), there is no guarantee that removal of the mangroves would reduce the low tide level within the Bay.</p> <p>Any reduction of low level wall porosity would have the effect of increased flow on the outgoing tide and therefore reduced depth for swimming at low tide. The ecology of the Bay would respond in accordance with the reduced levels. It is anticipated that the upper</p>	<p>Provide additional explanation in Section 5.6.2, Vol 2 (Option 10) to reflect the reasons why mature mangrove removal here is not recommended.</p>

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			range of seagrass would retract, however the lower range of mangroves could increase. As stated above, the recommended approach of dredging the Bay would increase water depths, promote circulation and make the most of water exchange that does occur.	
	H. T. (Bert) Carter BE (Civil, UNSW) (Continued)	Suggests that there has been a 'massive increase in the amount of sedimentation along the wall since the previous plan of year 2000'	This is not consistent with the findings of the hydrographic surveys dated 1999 and 2013 although differences in survey methodology make this hard to determine close to the wall (very few survey points are recorded in this critical area). So despite the survey data, it is agreed that there has been sediment accumulation near the wall. Aerial photography indicates that the main scour channel from the East Arm used to be closer to the wall in 2000 and has migrated northwards. It is likely that as the channel shifted, seagrass and (to a lesser extent mangroves) have also shifted into the area previously occupied by the channel, which is would accelerate deposition. The seagrass surveys undertaken for this CZMP also noted a lot of fine sediment (indicative of a depositional environment) in the area adjacent to the mangroves. It should also be noted that some stakeholders recall (from decades ago) easily wading through shallow water from the steps to the Lakeside Holiday Park 'without getting their shorts wet'. It is likely that these historical sand shoals were removed by dredging, and there has been gradual infilling since dredging ceased. Infilling has likely been with a combination of fine (flood-borne) sediments as well as coarser sediments scoured from the East Arm. Stabilisation of the East Arm will help to address this issue. The draft Plan recommends recommencement of dredging in the main part of the Bay which will assist in reducing the overall sediment budget of the Bay. As noted with the 'Titanics' submission, extending the area to be evaluated for dredging further towards the wall may be appropriate and should be reflected in this option.	Vol 1, Section 5.6, Option 12, 1 st dot point: modify to include consideration of south-western portion of the Bay.
	H. T. (Bert) Carter BE (Civil, UNSW) (Continued)	Considers that area of seagrass/mangroves is minor compared to Richmond River, and does not contribute to the ecosystem outside of Shaws Bay	The area of seagrass in Shaws Bay accounts is around 31,129 m ² . The area of mangrove is around 5,439 m ³ . Although only a proportion of the Richmond River habitats, these are significant areas. The degree of ecological linkage (e.g. mature fish) through the wall is unknown. Assertions that the Bay is a 'closed ecological system' cannot be supported. Fisheries NSW consider Shaws Bay to be part of the Richmond River estuary.	None
3	H. T. (Bert) Carter BE (Civil, UNSW)	Considers that the reduced tidal range has resulted in unnatural proliferation of seagrass and	Seagrass and mangroves do not colonise on the river side of the wall due to lack of suitable substrate within a colonisable elevation, whilst conditions within the Bay are ideal for seagrass and mangrove growth. The entire environment of Shaws Bay has changed	None

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	(Continued)	mangroves compared to the river side of the wall.	dramatically post-closure (as acknowledged in Mr Carter's submission). Shaws Bay continues to respond geomorphologically to the closure of the Bay. The river environment on the other side of the wall is not valid comparison. Estuarine ecosystems are dynamic and responsive in nature. The fact that seagrass and mangroves now grow in a previously clear area does not reduce the habitat value of these environments.	
	H. T. (Bert) Carter BE (Civil, UNSW) (Continued)	Suggests that the draft plan rejects the recommendation for dredging.	This is incorrect. The CZMP process explores alternative options such as dredging versus not dredging. This part of the submission refers to Option 6, which was specifically <u>rejected</u> by the plan. A key component of the CZMP is dredging of the main section of the Bay. This would require investigation of sediments, development of a dredging methodology and environmental assessment. Funding of \$400,000 is recommended for this action.	None
4	Robert Spencer	Endorses submission by Bert Carter (no. 3). Suggests that the draft plan rejects the recommendation for dredging.	Refer comments above.	None

REFERENCES

Hydrosphere Consulting (2014a) *Coastal Zone Management Plan for Shaws Bay, Ballina*. Volume 1: CZMP, Draft for Public Display.

Hydrosphere Consulting (2014b) *Coastal Zone Management Plan for Shaws Bay, Ballina*. Volume 2: Supporting Information, Draft for Public Display.

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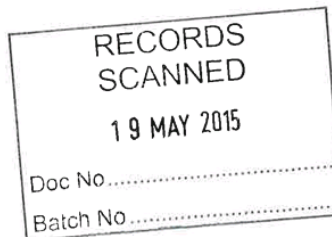
APPENDIX 1 – WRITTEN SUBMISSIONS



Department of
Primary Industries

TRIM REF: OUT15/7390

The General Manager
Ballina Shire Council
PO Box 450
BALLINA NSW 2478



Attention: Ms Kerri Watts

Dear Ms Watts

Re: Acknowledgement of responsibilities within the Draft Coastal Zone Management Plan for Shaws Bay

Thank you for referring the Draft Coastal Zone Management Plan for Shaws Bay (CZMP) to DPI Fisheries for review and endorsement. DPI –Fisheries has had a long history of involvement with issues affecting Shaws Bay and I am pleased that the department has been given the opportunity to contribute to the development of the Draft CZMP.

The adoption of the Draft CZMP by Council is a significant step towards finalising the CZMP process. DPI Fisheries acknowledges the agency has been identified as the lead organisation for Action 12: Education program – Recreational Fishing.

DPI Fisheries manages the NSW Fishcare Volunteer program and has an officer based on the NSW north coast. It is expected that this officer will continue to run education programs in Shaws Bay and the lower Ballina estuary. It is worth qualifying however, that implementation of this action is reliant upon the Department continuing to be successful in accessing funding for its implementation.

With regard Action 2, DPI Fisheries highlights that direct impacts on seagrass resulting from dredging activities would need to be assessed and potentially offset consistent with the Department's policy and guidelines for fish habitat conservation and management (updated 2013).

The Department looks forward to working with all CZMP partners to achieve the best outcomes for the ongoing management of Shaws Bay.

Yours sincerely

Dr Geoff Allan
Deputy Director General Fisheries
Date: 14 May 2015

Fisheries NSW – Port Stephens Fisheries Institute
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Our Ref: 14/07119 DOC15/171775
Your Ref: 14/89647

24 September 2015

The General Manager
Ballina Shire Council
PO Box 450
BALLINA NSW 2478



Attention: Kerri Watts

Dear Kerri

Re: Draft Shaws Bay Coastal Zone Management Plan - November 2014

I refer to your letter of 15 December 2014 seeking endorsement of the draft Shaws Bay Coastal Zone Management Plan (CZMP). I apologise for the delay in responding.

It is acknowledged that Ballina Shire Council has adopted the draft CZMP for submission to the NSW Minister for the Environment for certification.

The Department of Primary Industries – Lands is responsible for the coastal infrastructure, including the northern training wall of the Richmond River, which is central to the functioning of the Shaws Bay estuarine system. In addition much of the area covered by the CZMP is within the coastal Crown reserve system.

A number of Crown reserve Trusts have statutory management responsibility for Crown reserves included within the CZMP;

- *Ballina Coastal Reserve Trust* (managed by Ballina Shire Council) including the western foreshores and open space north of Compton Drive - subject to an adopted Plan of Management,
- *Ballina Shaws Bay Reserve Trust* (managed by Ballina Shire Council) including Pop Denison Park,
- *NSW Crown Holiday Parks Trust* (responsible for Shaws Bay Holiday Park) subject to an adopted Plan of Management.

The department administers the *Ballina Coast Regional Crown Reserve* - a strategic reservation covering all coastal Crown land in the LGA. The department has also issued a lease for business purposes covering Lot 483 DP 43825 (part Ballina Lakeside Holiday Park).

Trade & Investment | Crown Lands Far North Coast
Level 3, 49-51 Victoria Street, GRAFTON 2460, PO Box 2185 DANGAR NSW 2309
Tel: 02 6640 3400 Fax: 02 6642 5375
www.crownland.nsw.gov.au | ABN: 72 189 919 072

As a key stakeholder I wish to commend Council on preparing the draft CZMP and confirm the general support of the department to its recommendations. The links between the CZMP and recreational planning for Shaws Bay are significant and the department acknowledges Council's commitment towards improving the recreational values of the Crown foreshore reserves.

It is noted that the responsibilities of public land management bodies are not clearly identified in the CZMP. It is acknowledged however that Council has taken responsibility as lead organisation for the majority of the recommended management actions. Given Council's multiple roles its leadership in this regard is welcomed and should assist in streamlining implementation of the CZMP.

DPI - Lands is identified as lead agency for *Action 7: "Refurbishment of Breakwall Steps"* with an indicative budget of \$150,000 and delivery earmarked in the medium term for 2020/21. Council and NSW Fisheries are shown as support organisations.

The steps run along the waterfront adjacent to Shaws Bay Holiday Park and continue eastwards alongside the northern training wall. They are not an integral part of the training wall. The Conservation Management Plan for the Holiday Park identifies the steps as having historic significance.

The responsibility for the strip of foreshore reserve containing the steps in front of the Holiday Park rests with Ballina Coastal Reserve Trust (Council managed) whilst the steps alongside the training wall are on Crown land that is the responsibility of DPI – Lands.

The department's Coastal Infrastructure Program does not generally include provision for funding of public amenities (although there may be a case for maintenance of public access to the training wall at Ballina). In this case the Public Reserves Management Fund (PRMF) may be a more appropriate funding option in connection with Council and the department's management of this foreshore reserve area.

I wish to confirm there are no objections in principle to Action 7 however given the collaborative nature of the action and multiple roles of Council there is a strong case for Council to be identified as lead agency (consistent with other actions in the CZMP) with DPI – Lands and Ballina Coastal Reserve Trust as support organisations. Please note that NSW Crown Holiday Parks Trust has indicated its support in principle to the CZMP however its degree of involvement in Action 7 is a decision for the Trust Board.

DPI - Lands is identified as support agency for *Action 2: "Dredging of Main Section of Shaws Bay"* with an indicative budget of \$400,000 and delivery over the next three years 2016/18. Council is shown as lead organisation.

I wish to confirm there are no objections in principle to the allocation of support role to DPI – Lands for this action. Whilst the department provides funding support for dredging projects through the Rescuing Our Waterways program, dredging for recreational amenity may not satisfy the eligibility criteria. Alternative funding options including the PRMF may also need to be considered.

Please note that funding for Crown Reserve Trusts through the PRMF is subject to assessment on merit against applications on a state wide basis. To help facilitate delivery of the CZMP I wish to confirm the willingness of the department to participate should Council choose to convene an implementation committee or similar.

For further assistance with this matter please contact Mr Peter Baumann Natural Resource Management Project Officer by telephone: (02) 66429201.

Yours Sincerely



Kevin Cameron
Area Manager, Far North Coast
Department of Primary Industries - Lands