

**File Note / Memo**

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|----------------|---|------------------|--------------|
| <b>Project</b> | Ballina Coastal Zone Management Plan  | <b>Date</b>      | 10 June 2013 |
| <b>To</b>      | Paul Busmanis   | <b>Fax No</b>    | n/a          |
| <b>Of</b>      | Ballina Shire Council   | <b>Page 1 of</b> | 3            |
| <b>From</b>    | Charlie Hewitt  | <b>Ref</b>       | 001-001      |
| <b>Subject</b> | Summary of Community Consultation April-May 2013 for the Coastal Zone Management Plan for the Ballina Shire Coastline |                  |              |

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**Introduction**

The Coastal Zone Management Plan for Ballina Shire (CZMP) sets out how Council will manage coastal erosion on beaches throughout Ballina Shire. Coastal erosion comprises:

- Beach erosion, due to offshore movement of sand from the beach during storms or an extreme or irregular event;
- Shoreline recession due to;
  - sediment budget deficits (i.e. more sand leaving a beach and its embayment than is entering it), and
  - sea level rise; and
- Coastal inundation, due to large waves, resulting from extreme ocean storm events, overtopping dunes or seawalls and inundating the land behind.

At the February 2013 Council meeting it was resolved unanimously to place the Draft CZMP on public exhibition. This file note summarises the public exhibition process and the submissions received.

**Public exhibition**

The Draft CZMP was placed on public exhibition for six weeks between Saturday 6 April and Monday 20 May. During this period a PDF format copy of the report was available on-line on Council's website via a link on Council's homepage, and hard copies were available at Alstonville, Ballina and Lennox Head libraries and the Customer Service Centre Ballina.

A range of methods were used to notify the public and key stakeholders of the nature of the CZMP, the public exhibition of the Draft CZMP, and the opportunity to review and comment, including:

- Notification on Council's website and homepage;
- Presentation of A4 flyers and hard copies of the Draft CZMP at Alstonville, Ballina and Lennox Head libraries and the Customer Service Centre Ballina during the public exhibition period;
- Advertisements on Council's regular page in the *Northern Star* on Saturday 6 April and Saturday 27 April;
- Advertisements on Council's regular page in the *Ballina Shire Advocate* on Thursday 11 April and Thursday 2 May;
- Presentation to the Lennox Head Chamber at Business Breakfast meeting of Wednesday 3 April -- approximately 15 people;
- A letter sent to each member of the CZMP Community Reference Group (CRG) in the week beginning Monday 15 April. The CRG has not met for some time but comprises representatives from;
  - NSW Office of Environment and Heritage
  - Lennox Head Residents Association;

- o Ballina Environment Society;
  - o Lennox Head Landcare;
  - o Ballina Chamber of Commerce and Industry;
  - o Cape Byron Marine Park;
  - o State Emergency Service;
  - o Crown Lands;
  - o East Ballina Landcare; and
  - o Jali Aboriginal Land Council;
- Meeting with the executive committee of the Lennox Head Residents Association on Monday 15 April – four people;
  - A public open day between 9 am and 12 noon on Saturday 4 May outside the Lennox Head IGA supermarket – the project consultant discussed the CZMP with approximately 30 people in total;
  - Presentation to the Lennox Head Residents Association general meeting on Monday 6 May – approximately 20 people; and
  - A letter box drop of an A4 information flyer to all dwellings within the 2100 coastal hazard zone in Lennox Head during the week beginning Monday 6 May – approximately 100 dwellings.

The promotion of the Draft CZMP included shire-wide efforts, but focussed on Lennox Head as coastal erosion threats are primarily located in Lennox Head, and are considered very low in other areas.

#### **Submissions received**

A range of avenues were made available for stakeholders to provide comment including:

- Written submissions via letter and email (dedicated email address);
- Verbal submissions via discussion with Project consultant at various meetings and presentations and the public open day as listed above;
- Verbal submissions via discussion with a Council officer at the Customer Service Centre Ballina or via telephone.

A total of four written submissions were received from:

- Lennox Head Residents Association;
- Lennox Head Landcare; and
- Three members of the public.

A verbal submission was made in person by one member of the public in discussion with a Council officer.

Numerous verbal submissions were made by representatives of groups and individual members of the public via discussion with Project consultant at various meetings and presentations and the public open day as listed above.

#### **Summary of submissions**

None of the submissions raised direct opposition to or major concerns regarding the Draft CZMP. All submissions related to Lennox Head (Seven Mile Beach), although two included minor consideration of the threatened walking track at Boulder Beach supporting protection of the track as outlined in the Draft CZMP. A summary of the submissions follows.

- Council's management philosophy to protect public and private property rather than retreat in the face of coastal erosion was not challenged.
- The general approach of using a combination of beach nourishment and a seawall to protect public and private property was not challenged, although some submissions included concerns regarding the availability of funding for these works (see below).
- Some individuals questioned the efficacy of the proposed beach nourishment feeling that it would be "lost in the next storm", however this was largely countered by careful explanation of the quantities

involved and the nature of near-shore sediment movement in response to storms and longitudinal sand budgets.

- Concerns were raised by a number of individuals and two groups, the Lennox Head Residents Association and Lennox Head Landcare, regarding the availability of state and federal government funding for beach nourishment and to a lesser extent sea wall construction. These submissions suggest that the triggering of beach nourishment and/or seawall works at Lennox Head is likely to coincide with similar needs across large sections of the coast, meaning that government funding will be stretched severely and may not be available for Lennox Head. It was recommended that Council lobby for a clear funding arrangement between all levels of government to be introduced in anticipation of this potential scenario.
- Submissions from residents of Rayners Lane, Lennox Head Landcare and the Lennox Head Residents Association question the southern extent of the existing sea wall. They suggest there is a stretch of beach approximately 20-30 metres long between the rock wall and the constructed levee at the southern that is largely unprotected by formal structures. This is contrary to the findings of the Ballina Coastline Hazard Definition Study (2003; 2011), on which the CZMP is based, which indicates there is continuous protection south of Byron Street.
- Lennox Head Landcare and the Lennox Head Residents Association raised questions regarding the adequacy and protective capacity of the clay/rock core of the constructed levee at the southern end of Seven Mile Beach. This is contrary to the findings of the Ballina Coastline Hazard Definition Study (2003; 2011), on which the CZMP is based, which indicates the levee provides complete protection.
- The Lennox Head Residents Association suggests that the wall seaward of the Lake Ainsworth Sport and Recreation Camp was not constructed to the Council specified standard or length leaving the camp facilities and Lake Ainsworth exposed to coastal erosion risk. This is *not* contrary to the findings of the Ballina Coastline Hazard Definition Study (2003; 2011), on which the CZMP is based, which indicates the coast north of Byron Street is exposed to coastal erosion threat.
- Catherine Cusack MLC attended the public open day and discussed her concerns at length with the project officer. She put forward the following opinions:
  - The hazard lines presented in the CZMP, from the Ballina Coastline Hazard Definition Study (2003; 2011) would have a negative impact on the value of Pacific Parade properties;
  - Council appeared to show reckless disregard in releasing the hazard lines publicly; and
  - The Bruun Rule (used in the Ballina Coastline Hazard Definition Study (2003; 2011)) is crude and inadequate in estimating shoreline recession due to sea level rise.

In response she was advised that the hazard lines had been reviewed by the NSW State Government, had been in the public domain since 2003, and it was well known, especially among long-term local residents, that the shoreline in Lennox Head has receded significantly over the last 50-100 years. With regard to the Bruun Rule she was advised that her option is shared throughout the coastal management community, however limited resourcing meant that more complex modelling to translate a rise in sea level to a lateral recession distance was generally not possible. She was referred to the section of the CZMP that discusses the recent modelling done as part of an independent PhD that considers the local effect of sea level rise on Seven Mile Beach more closely.

- A small number of individual verbal submissions indicated scepticism regarding climate change and sea level rise and thus the plan and the proposed works are unnecessary. The response to such suggestions was that the plan recognises uncertainty in sea level rise predictions and accordingly recommends trigger points and staged works to ensure that investment in works does not proceed until they are necessary.

#### **Conclusion**

The submissions received do not require any significant changes to the Draft CZMP, however the NSW Office of Environment and Heritage has yet to make its submission. Concerns raised over the adequacy of existing protective structures appear to warrant additional investigative actions the findings of which may indicate repair or upgrade works are necessary.

**COASTAL ZONE MANAGEMENT PLAN FOR THE BALLINA COASTLINE**



Ballina Shire Council is required by the NSW Government to prepare a Coastal Zone Management Plan setting out how Council will manage erosion on our beaches.

The plan is based on studies that have identified the likely extent of coastal erosion currently, as well as projected erosion for 2050 and 2100.

To meet management principles set by the NSW Government, the plan recommends on-going monitoring and beach nourishment (importing sand) to maintain beach access and amenity.

Generally there is low risk to public or private assets from coastal erosion, so the recommendation for most beaches is to allow natural processes to occur under monitoring.

More significant works are recommended for Seven Mile Beach at Lennox Head, and to a lesser extent, Boulder Beach, as outlined in the following table.

| Beach                               | Recommended works   |
|-------------------------------------|---|
| Lennox Head – north of Byron Street | Primary measure – beach nourishment (import sand)<br>Secondary measure – rock seawall |
| Lennox Head – south of Byron Street | Maintain existing rock seawall and constructed dune (at the Bream Hole)               |
| Boulder Beach                       | Install rock wall to protect and upgrade part of an existing path                     |

These works will require further investigation, planning, approvals and funding. By preparing the plan, Council should be eligible for funding assistance from the NSW Government.



**The draft plan will be on public exhibition from April 8 to May 20, 2013.**

**Review the plan at Community Access Points:**

- Customer Service Centre, Ballina
- Kentwell Community Centre Ballina
- Ballina, Lennox Head and Alstonville libraries:
- Online: [www.ballina.nsw.gov.au](http://www.ballina.nsw.gov.au).
- Public Open Day: Saturday 4 May from 9 am to 12 noon outside the Lennox Head IGA.

**You can provide your comments on the plan by May 20, 2013.**

**Comment:**

- In person at the 4 May open day
- By phone – call Paul Busmanis at Ballina Council on 6686 4444
- Via email [coastal@ballina.nsw.gov.au](mailto:coastal@ballina.nsw.gov.au)
- By mail Ballina Shire Council, PO Box 450, Ballina NSW 2478

*This project was supported by the NSW Government's Coastal Management Program.*

**Paul Busmanis**

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**From:** Barry Fitzhenry [bjfitzhenry@gmail.com]  
**Sent:** Wednesday, 8 May 2013 4:50 PM  
**To:** coastal  
**Subject:** coastal zone Management

My two bobs worth:

General comment: The NSW government is and will be too broke to fund any broad "across the state" works over a short term, so a early incremental approach might be better. For example, redirect sand import funds to purchase and aesthetically stockpile rock from the new highway project, provided its at the right price and the part subsidy is available from the State.

1. import sand: A waste of time unless property is threatened or the situation is critical and I don't think it is. Reference to the sand monitoring project near Lake Ainsworth might be useful.
2. bream hole: yes - use some rock from above
3. boulder beach: no opinion

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Best regards,

Barry Fitzhenry  
63 Stewart Street  
LENNOX HEAD 2478  
(new phone & address!)  
m 0408116891  
m 0423537622

**Paul Busmanis**

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**From:** Jane and Craig [cleete@bigpond.net.au]  
**Sent:** Monday, 20 May 2013 8:39 AM  
**To:** coastal  
**Subject:** Coastal Zone Management Plan

Dear Council Staff and Councillors,

We would like to support the proposed policy of coastline PROTECTION rather than retreat.

We would particularly like to support the proposal which we believe offers the greatest amenity to residents and visitors of Lennox Head, specifically the sand nourishment proposal. This would offer the most natural and attractive visual amenity, as well as maintaining a good beach width for actual use and it would return the connection to the southern end throughout the tides.

We were very pleased to see that if any seawalls need to be built to back up the sand nourishment, the intention is to construct them in a way to allow the rocks to be covered and vegetated with grass/plants. Landscaping and attractive and cohesive paths and seating would be important .

It would be a great improvement to Lennox beach appearance if the current rock wall in front of the park could be modified to allow infill and vegetation to be planted to soften and make the appearance more natural-and safer.

Thank you for the opportunity to comment,

Kind regards,

Jane and Craig Leete

**Paul Busmanis**

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**From:** Paul Busmanis  
**Sent:** Tuesday, 14 May 2013 12:22 PM  
**To:** coastal  
**Subject:** deputation from Mr John Stewart

**for record purposes:**

Mr John Stewart visited the Council Administration building in Ballina on the morning of 14 May 2013.

Mr Stewart met with Paul B. and wanted to make a comment about the CZMP without needing to make a written submission.

Mr Stewart has been a resident of Lennox Head for over 50 years and said the solution for future protection for Lennox Head was a seawall.

Mr Stewart said the seawall needed to be of very large rock with deep foundations and construction could be staged and commence from the existing seawall heading north.

Mr John Stewart  
1 Lennox St  
Lennox Head

**LENNOX HEAD LANDCARE**  
*Working Together for our Environment*



PO Box 84 Lennox Head NSW 2478

16 May 2013

General Manager  
Ballina Shire Council  
PO Box 450 Ballina NSW 2478

Attention: Paul Busmanis

**Re: Draft Coastal Zone Management Plan for Ballina Shire**

Dear Paul

We have read the plan on exhibition and wish to make the following observations regarding the Boulder Beach and Lennox Head and sections.

We are very pleased with the recommendations regarding stabilisation of the southern corner of Boulder Beach. We have been concerned for several years about the steady erosion taking place at this point and have spoken with council staff previously regarding the protection of the walking track and more importantly the dune itself. We believe that the vegetation on this dune has largely escaped early clearing and is therefore very valuable in its own right. There is some reason to believe that the present instability has been caused by harvesting of stone from the beach in the 60's and 70's following the sand mining. Old photographs show a very different beach than exists now.

The proposals for Seven Mile Beach north of Byron Street appear to be based on a very logical approach with which we agree. Our concerns are whether the funding required is going to be made available, not only to react to more frequent storm damage, but even for the results of longer term sea level rise. We understand the costs might be in the order of \$10 m for beach nourishment and \$3 m for a retaining wall. Also the beach nourishment will be ongoing after the construction of a wall. Ballina Shire will be competing for the necessary funding against many other councils, some of which already have more serious problems than ours.


To build confidence in the CZMP process the State Government should act to establish a scheme to create provisional funding for events state wide. Possibly council should also do the same for its area. It could be argued it should be a nationally funded process.

In regard to the southern section of Seven Mile Beach we believe there is some doubt among long term residents regarding the degree of reinforcement under the red soil dunes. This would indicate that some investigation should be carried out to more



accurately establish their ability to resist a severe storm event. The area behind these dunes is very low lying and possibly susceptible to serious damage from flooding during an overtopping event.

Yours faithfully



Malcolm Milner  
President

TRIM 13/28087

*R. G. G. / 13  
1/12*

**Response of Lennox Head Resident's Association to Draft Coastal  
Management Plan for Ballina Shire**

**1. Introduction**

The Association is grateful for and appreciates the level of consultation and input offered in association with the draft plan. Response and comment comprise the following:

- 1.1 Philosophy and method of treatment underpinning the plan
- 1.2 Treatments relating to Boulder Beach and Seven Mile Beach north of Byron Street
- 1.3 Issues regarding the southern section of Seven Mile Beach relating to the red soil dunes
- 1.4 The Question of the extent of the existing rock wall on the Rainer's Lane section of 7 Mile beach.
- 1.5 The extent of the rock wall at the southern end of the Sport and Recreation Centre.

**2. Philosophy and Method of Treatment Underpinning the Plan**

The Association fully supports the philosophy of retention and the treatment of retaining walls and sand dredging as operational protection strategies opposing flood and ocean surges. We do however question the funding methodology and request that all levels of government develop contingency funding budgets for hazard mitigation purposes.

**3. Treatments Relating to Boulder Beach and Seven Mile Beach North of Byron Street.**

The recommendations regarding the stabilisation of the southern corner of Boulder Beach are strongly supported. The positions relating to Seven Mile Beach North of Byron Street based on a Sand Management Plan and the construction of rock sea walls are positively affirmed with the only question related to method of funding as outlined above.

z/c

4. Issues Regarding the Southern Section of 7 Mile Beach relating to the Red Soil Dunes

The accuracy of the existence of a rock lower strata level securing the red soils dunes on the southern section of 7 Mile Beach is questioned and long standing residents have queried this proposition. This should be checked in the same manner as alternative subterranean rock wall positions are under examination at alternative sites on the beach

5. The Extent of the Existing Rock Wall on the Rainer's Lane Section of Seven Mile Beach

Again the accuracy of the data in the report relating to the length of the wall along the Rainer's Lane section of the beach has been questioned by long standing residents.

A re-examination of this buffer wall is supported as partial incompleteness will lead to vulnerability in this area.

6. The Extent of the Rock Wall at the Southern End of the Sport and Recreation Centre

It is contended by long standing residents that the rock wall built in 1998/9 by state government to secure the beach area in front of the Sport and Rec Hall did not conform to the (then) Council's specification and has not been completed to the length determined by Council's spec. This being the case it would create vulnerability to surges at the Sport and Rec institution but also threaten the Northern section of Lake Ainsworth to a flooding and overtopping event.

It is requested that these facts be checked and the outcome reported.

7. Conclusion

The report sets out a logical and rational approach to mitigation treatment against the threat of storm surge and sea level rise. The Association commends this pragmatic position. However the Association would request that funding schedules by all three levels of Government be made available so that it is evident that clear contingency funding has been established for impending works. In addition a programme of works should be made public as soon as possible so confidence can be

8/5

achieved in the community that protective treatments will be addressed in good time.

Finally it is requested that Council check the veracity of factual data illustrated in points 1.4/5 & 6 above.

Graham Shaw for the Lennox Head Residents Association

TRIM 13/2016

**Ballina Environment Society Inc**  
 PO Box 166 Ballina  
 NSW 2478 Australia  
 Email: BES2478@gmail.com  
 Ph: 0421-551-768



**SUBMISSION: THE COASTAL ZONE MANAGEMENT PLAN FOR THE BALLINA SHIRE COASTLINE**

Ballina’s beaches are among the most important assets Ballina Shire possesses and we all must face the reality that this zone is under significant threat from natural processes exacerbated by human impacts.

The issues raised in the Coastal Zone Management Plan by Geolink, with the input of the Community Reference Group are many and complex.

Primarily of note is the need to ensure any beach nourishment is from sources which are of suitable sand quality. The only option for such a supply is 10km offshore and will require a machine to be imported from overseas.

BES fully supports the premise that sand dredged from the river mouth would not be suitable for beach nourishment. However, BES questions if beach nourishment is feasible and viable given the cost constraints connected to the equipment required.

The proposition to use a modular drainage design to take stormwater from the boat channel, Lennox Street, Williams Street, Ross Street and Foster Street further east of the dune toe will likewise be costly.

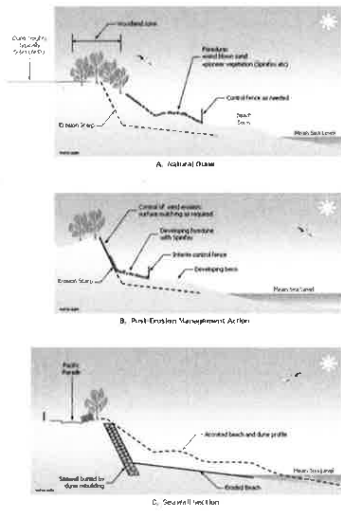
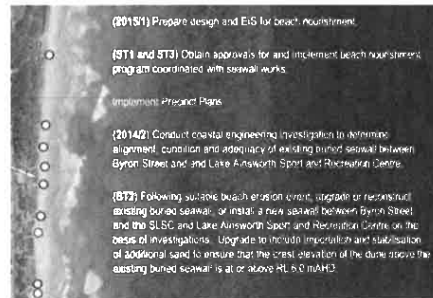


Illustration 3.9 Conceptual Dune Management Guidelines

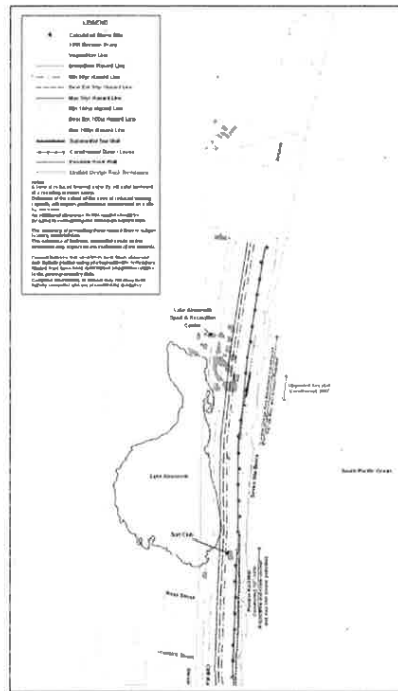
Do we accept stormwater on our beaches and is the only erosion control the only outcome for stormwater improvement? Has there been investigation into containing and reusing stormwater flows, or redirecting flows from the beach.

The plan is not clear is not clear how the hind dune seawall along Pacific Parade is to be remediated if assessment dictates it is necessary. BES does not support any demolition of existing dunes to construct further flat areas, stormwater drains or sea walls. Yet the premise that upgrading and reconstruction of the existing buried seawall will occur 'Following suitable beach erosion event' may not be the proactive approach needed to maximise dune protection.



The assumption that 'pocket beaches' are not regressing is questioned by BES members who regularly visit and work on these beaches. Of particular concern is Angels Beach, south of Flat Rock, and around the creek on Sharpes Beach, yet the CZMP does not does not propose any management strategies.

The plan notes the impact on storm event erosion on the current pathway asset at Shelly Beach. It would have been hoped some comment would be made on the proposed dual pathway - in terms of planning controls to minimise the impact on any pathway and protection of any pathway from coastal processes.



Likewise, BES questions if the erosion of dunes north of Lake Ainsworth should go unmitigated. We also question if the science of where the 50 and 100 year erosion scarp will be. When the Lake has breached in the past it has been at the old 4wd access point. This indicates the lake could be penetrated by the ocean during a storm event long before the impacts of the proposed sea level rises would indicate.

Meanwhile the pathway at Boulders is highlighted for immediate remediation. BES agrees this path will be difficult to replace by a duplicate path inland - as we have continually stressed over the Coastal Pathway consultation - and the path must be treated in a sensitive manner if the cultural significance of the rock wall and native food plants are to be retained.

BES would like to request that Briefs for projects of such significance be put out for public comment at the front end of the project - rather than consultation following the reports preparation. However, we would like to thank Geolink's consultants for their openness to consultation.

We are also disappointed that the integrity of this and the Combined Coastal Reserve Plan of Management are both impacted by their lack of integration with each other and with the LEP and other planning processes.

BES supports the concepts of sourcing materials and reinforcing beach profiles through plantings and education to mitigate coastal erosion, while establishing a comprehensive monitoring regime.

The CZMP proposes Council be proactive in beach protection. To BES, this is far preferable to previous exploitative plans to open access largely through an impermeable concrete swathe up to 3.5 meters wide over our dunes and cliffs, and BES strongly applauds that.

Thank you for the opportunity to comment on the CZMP.

Fiona Folan  
 President  
 20<sup>th</sup> May, 2013

TRIM 12/28620

NORTHERN BEACHES USERS CLUB.

President: Denis Magnay. Ph. 66865139.

Address all correspondence to the Secretary Mr Bob Pilling 34 Fenwick Drive East Ballina 2478.

In relation to the proposed coastal zone Management Plan for the Ballina Shire Council we submit the following.

Our main concern is that the plan recommends certain restriction be applied to 4wd use on Angel & Sharpe's Beaches.

Firstly the plan advises that there is no disruption to the existing (C.R.P.M) Coastal Reserve Plan of Management 14.1 on page 92. Page 92 enclosed

Further on in the report we see the heading "Recommended Management Actions". Page. 109. Page 109 enclosed.

Under the "Recommended Actions" we note that sentences appear under "Management Objections" 3.3 & 4.3 "Restrict 4wd beach access at Sharpe's Beach to emergency vehicles & professional fishermen"

Several other "Management Objections" appear on 3.3 & 4.3 which appear to give Council Staff their own discretion as to how restrictions will be applied & which contradict the C.R.P.O.M. Page 146 enclosed.

We recall recently how one Staff Member gave authority to close off these beaches by erecting padlocked gates. Only to be made to have them removed.

We don't recall any Precinct Plans which stipulates only "Emergency Vehicles"& Professional Fishermen" can use Sharpe's or Angels Beach.

At a recent "Workshop" conducted by Council to deal with the C.Z.M.P this issue was raised by a Councillor & the reply from the Mayor, the General manager & other Senior Staff was that 4wd users for night time fishing have nothing to worry about being denied access to Sharpe's or Angels Beaches.

We contend that under those circumstances those paragraphs should be omitted from the plan.

We also contend that there is no proof that 4wd have any impact on the shaping of the Beach, Sea-level rise or Global Warming.

The Community Reference Group which is used to make important decisions is listed on page 93. Enclosed.

We are unhappy that of the ten listed groups there is not one recreational group or fishing group included, but several environmental groups are.

We feel recreational groups have been ignored This is in spite of the fact that on page 87 it states the "Purpose" of the C.R.P.O.M is for the notified purpose of "Public Recreation & Coastal Environmental Protection " page 87 enclosed.

Bob Pilling. Secretary



Denis Magnay. President.





11.4 Coastal Zone Management Plan for the Ballina Shire Coastline.DOC

The actions set out in the Precinct Plans include consideration of:

14.01

- Dogs
- Horses
- Beach access for vehicles
- Camping and social functions
- Commercial activities
- Dune stabilisation
- Vegetation management
- Other land managers
- Aboriginal heritage
- European heritage
- Surf Life Saving Clubs
- Traffic and parking
- Stormwater
- Pedestrian access
- Beach and headland erosion
- Public amenities
- Walkways and cycleways
- Development
- Water quality
- General regulations
- Education

The actions within the precinct plans are comprehensive, have been developed on the basis of extensive community consultation, and have been adopted by Council. This CZMP is required to fully integrate the objectives, recommendations and actions of CRPOM, both as a Council requirement and a requirement under Section 55c of the NSW Coastal Protection Act 1979. Under direction of Council, in order to avoid the duplication of previous processes or established outcomes, this CZMP wholly adopts the objectives, recommendations and actions of the CRPOM and the precinct plans, and makes reference to the precinct plan actions where necessary.

XXXXX  
XXXX

1.4.1.1 Consideration of Coastal Hazards in the Ballina Coastal Reserve Plan of Management and Precinct Plans

The CRPOM outlines a number of broad management objectives and the strategies by which those objectives will be met. With respect to coastal erosion, the CRPOM management objective is:

"Give the impacts of natural hazards a high priority in the planning and management of the Coastal Reserve."

To address this objective, the CRPOM refers directly to WBM (2003), and by inference this CZMP, without further detail or direct reference to the coastal hazard mitigation influence of management strategies. Nevertheless, a number of the management strategies presented in the CRPOM and associated Precinct Plans will assist in the mitigation of coastal hazard, and cross references to these strategies are provided in the CZMP.

1.4.2 The coastline south of the Richmond River

The coastline south of the Richmond River is primarily managed by

- The Crown Lands Division of the NSW Department of Trade and Investment, Regional Infrastructure and Services; and
- The National Parks Wildlife Service of the Office of Environment and Heritage within the NSW Department of Premier and Cabinet.

However Ballina Shire Council has responsibility for 1.4 Ha parcel of land adjacent to the settlement of Patches Beach. For this parcel, Council has prepared a vegetation management plan which addresses a variety of issues including damage to dunes, weed infestation, erosion and predation by feral animals.

The Threatened Species (Pied Oystercatcher) Management Strategy (Department of Lands, 2007) aims to facilitate cooperative land management to minimise the impact of human activities on the Pied Oystercatcher within the area bounded by the southern breakwall of the Richmond River and the Black Rocks 4WD access track which is beyond the Ballina LGA boundary.

1.5 Stakeholder Consultation

The preparation of the study and plan has been underpinned by regular consultation with the project Community Reference Group (established specifically for this project), the Ballina Shire Council Civil Committee, the Office of Environment and Heritage, and the general public. Key steps have also been reported to open meetings of the elected Council.

?XXXXX  
XXXX



Coastal Zone Management Plan for the Ballina Shire coastline V2  
0769654

11.4 Coastal Zone Management Plan for the Ballina Shire Coastline.DOC



**Recommended Management Actions**

**3.1 Introduction**

As discussed in Section 2.1, this CZMP focuses on the three main coastal hazards identified in WBM (2003) and BMT WBM (2011):

- **Beach erosion**, due to offshore movement of sand from the sub-aerial beach during storms or an extreme or irregular event;
- **Shoreline recession** due to sediment budget deficits (i.e. more sand leaving a beach and its embayment than entering it), and sea level rise; and
- **Coastal inundation**, due to large waves, resulting from extreme ocean storm events, overtopping dunes or seawalls and inundating the land behind.

Shoreline recession generally occurs over the long term and has been observed on many beaches of the Far North Coast as a dominant process in recent decades. Beach erosion is generally the result of a severe storm event, or series of closely spaced events, that can occur at any time and is generally followed by a period of accretion.

As a result of the variation in the nature and timeframe of the erosion components, the management actions to mitigate the threats associated with beach erosion will not necessarily mitigate the threats associated with longshore sediment transport differentials and sea level rise. However, some possible management actions to mitigate against long term erosion threats (e.g. seawalls and beach nourishment) are likely to be effective to a large degree against beach erosion. Conversely, some possible management actions to mitigate against beach erosion (e.g. temporary rock walls) may in fact exacerbate long term erosion threats if not implemented appropriately, and this may necessitate their removal following the abatement of the storm threat.

Cost-effective management of coastal erosion requires a set of complementary short-term (emergency) and long-term management actions to coordinate preparedness, mitigation and recovery in order to maintain coastline amenity.

- Section 3.2 outlines the Emergency Action Subplan for Coastal Erosion (EAS) which guides Council's response to immediate coastal erosion emergency events in which beach erosion threatens the safety of people or destroys or damages any property (refer glossary). The EAS is separate from this CZMP.
- Sections 3.3 to 3.7 present long term management actions to mitigate against coastal erosion due to longshore sediment transport differentials and sea level rise, which can also have beach erosion imposed on top of them.

**3.2 Coastal Erosion Emergency Events**

Coastal erosion emergency events are most likely to arise when severe storm conditions (cyclones or low pressure systems) generating strong onshore winds and large waves, coincide with high spring tides. Coastal erosion emergency events may also occur under relatively benign conditions where, due to the significant lowering of a beach profile as resulting from natural processes, waves are able to scour the back beach erosion escarpment resulting in landward recession of the escarpment. Coastal erosion and/or inundation may exacerbate risk to development, infrastructure, and/or persons.

To manage these risks Council has prepared an Emergency Action Subplan for Coastal Erosion (EAS) that is separate but related to this CZMP. The EAS details actions to be carried out by Ballina Shire Council (Council), in response to a coastal erosion emergency event.

A coastal erosion emergency event is defined as a situation in which:

- beach erosion is imminent, is occurring, or has occurred; and



Coastal Zone Management Plan for the Ballina Shire coastline V2  
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- Confirm the broad community benefit of allowing public 4WD access to the Flat Rock area and conduct frequent 4WD compliance and enforcement schedules where required;
- Maintain existing and expand sand capture and revegetation works at Flat Rock tombola;
- Conduct sand capture and revegetation works and manage pedestrian traffic around the northern car parking area at Shelly Beach; and
- Continue sand capture and revegetation works around Patches Beach

3.7.3 Precinct Plans for Precincts 2, 3, 4 and 5

A number of the actions presented in the Precinct Plans for Precincts 2, 3, 4 and 5 will serve to address coastal erosion issues in this beach unit, many of which relate closely to the points outlined in Section 3.7.2.1. They include:

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- Management Objective 3.3 – Off road vehicle beach access**
  - Restrict 4WD beach access at Sharpe's Beach to emergency vehicles and professional fishermen
  - Maintain signage advising of vehicle beach access regulations at each access point
  - Promote regulations in local media and promotional material
  - Upgrade policing of regulations by increased and coordinated ranger presence
  - Install locked gate as part of Coastal Reserve Master Key system as required (if drivers disregard regulations)
- Management Objective 4.3 – Vehicle access**
  - Discourage off road vehicle access onto Sharpe's Beach and Angels Beach
  - Annual review of beach access regulations. Change regulations based on complaints and identified impact of vehicles on recreation and natural amenity of beach
  - If usage impacts on beach Council revokes policy of permitting vehicles on Angels Beach between sunset and sunrise
- Management Objective 4.9 – Vegetation management**
  - Impose heavy fines on any illegal clearing of native vegetation
  - BSC provides additional resources to support community participation in native vegetation management works (e.g. supply materials such as mulch, herbicide, and fencing). Be proactive in providing training and assisting networking
- Management Objective 4.10 – Vegetation management**
  - Prioritise actions in the Angels Beach Vegetation Management Plan. Encourage community to implement highest priority actions
  - Implement Angels Beach Vegetation Management Plan focusing on highest priorities
- Management Objective 4.15 – Habitat protection through education**
  - Promote the environmental values of Precinct 4 by using the local media, publication and distribution of brochures, placement of signage etc. Continue to use the area for public education
- Management Objective 5.3 – Environmental Management (Shelly Beach)**
  - Review, prioritise actions and implement the Shelly Beach Vegetation Management Plan
  - Support Care groups as per action 5.4
- Management Objective 5.4 – Environmental Management (Lighthouse Beach)**
  - Upgrade, prioritise actions and implement the Lighthouse Beach Vegetation Management Plan
  - Support Care groups as per action 5.4



11.4 Coastal Zone Management Plan for the Ballina Shire Coastline.DOC

1.5.1 Community Reference Group

The primary consultative mechanism for this study is the Community Reference Group convened by Ballina Shire Council. The group's members were chosen by Council and assigned to the project as experienced and informed representatives of sections of the community and government agencies. The Community Reference Group operates under Terms of Reference which are included in Appendix C.

The Community Reference Group includes representatives of the following groups:

- Office of Environment and Heritage;
- Department of Lands;
- Lennox Head Residents Association;
- Ballina Environment Society;
- Lennox Head Landcare;
- Ballina Chamber of Commerce and Industry;
- Cape Byron Marine Park;
- Ballina Shire State Emergency Service;
- East Ballina Landcare; and
- Jalk Local Aboriginal Land Council.

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The Community Reference Group has met on four occasions to consider the study and plan:

- 26 August 2006 – introduction to project, review of Ballina Coastline Hazard Definition Study, responsibilities of group
- 14 November 2006 – identification of coastline values, study context
- 15 May 2007 – review and confirmation of values, consideration of management options and assessment criteria
- 14 August 2007 – assessment of management options for key locations, identification of preferred options

1.5.2 Ballina Shire Council Civil Committee

The Ballina Shire Council Civil Committee comprises all Ballina Shire Councillors and staff designated by the General Manager. The primary function of the committee is policy formulation; however it often meets to consider items in detail prior to submission of the matter to the Council. It has no delegated authority and meeting minutes and recommendations are submitted to Council for approval.

The committee has met on three occasions to consider the study and plan:

- 29 October 2007 – review of management options and their consequences, preliminary recommendations on preferred options
- 14 March 2008 – review of Ballina Coastline Management Study
- 9 July 2008 – review of public comments on study, confirmation of recommendations

1.5.3 NSW Office of Environment and Heritage

The NSW Office of Environment and Heritage (OEH) is the division of the NSW Department of Premier and Cabinet that is the lead agency in implementing government policies, guidelines and legislation in relation to coastal zone management. OEH also administers the NSW Government's Coastal Management and Estuary Management programs which are the primary mechanism for assisting local councils in the preparation and implementation of Coastal Zone Management Studies and Plans. Representatives of OEH have reviewed this CZMP and the preceding management studies (GeoLINK, 2007; GeoLINK, 2008) at critical stages, and have been closely consulted on key elements.

1.5.4 Natural Disaster Mitigation Program

The Natural Disaster Mitigation Program (NDMP) is a national program aimed at identifying and addressing natural disaster risk priorities across the nation. The Ballina Coastline Management Study and this CZMP are jointly funded by Ballina Shire Council and the NDMP. Progress reporting to NDMP managers has continued throughout the project.



11.4 Coastal Zone Management Plan for the Ballina Shire Coastline.DOC

Ordinary Meeting Attachments Page 87

Subsection 55C(3) permits the Minister to give direction that a CZMP make provision for only one or more of the items listed in subsection 55C(1). This CZMP does not relate to an estuary and thus does not provide for item (c) above.

Furthermore, the *Guidelines for Preparing Coastal Zone Management Plans* (DECCW, 2010) requires that a CZMP address three broad areas, namely:

- Managing risks to public safety and built assets;
- Pressures on coastal ecosystems; and
- Community uses of the coastal zone.

1.2.2.1 *Managing risks to public safety and built assets*

This CZMP focuses on maintaining or improving the ecological, cultural, recreational, and economic values that are exposed to the following coastal hazards:

- Beach erosion, due to offshore movement of sand from the sub-aerial beach during storms or an extreme or irregular event;
- Shoreline recession due to sediment budget deficits (i.e. more sand leaving a beach than entering it) and sea level rise; and
- Coastal inundation, resulting from extreme ocean storm events, overtopping dunes and inundating land behind the dunes.

The nature and extent of these coastal hazards are identified in WBM (2003) and BMT WBM (2011) and summarised in Section 2.1. The values and the respective threats posed by coastal hazards are outlined in Geol.LINK (2007, 2008) and summarised Section 2.2.

1.2.2.2 *Coastal Ecosystems and Community Uses of the Coastal Zone*

Management of coastal ecosystems and community uses of the coastal zone has been thoroughly considered in various other plans including those listed in Section 1.4. In cases where ecological, cultural, recreational, and economic values are not exposed to coastal hazards this CZMP complements or refers to, without duplication, these plans, in particular the Ballina Coastal Reserves Plan of Management (CRPOM) and the Precinct Plans that underpin it.

In defining the purpose of the plan, the CRPOM states:

*The primary objective of the Ballina Coastal Reserve Plan of Management is the rationalisation of all vacant Crown lands and existing Crown reserves into a single coastal Crown reserve for the notified purpose of Public Recreation and Coastal Environmental Protection with the appointment of Ballina Shire Council as Reserve Trust Manager.*

*The [CRPOM] has been prepared by DLWC [now OER] in partnership with Ballina Shire Council through Council's Coastal Committee. The Committee was established in 1999 primarily to oversee development of the Plan, and adopted as its terms of reference ..... to assist Ballina Shire Council in achieving integrated, balanced, responsible and ecologically sustainable development of the Ballina Shire coast.*

*...[The CRPOM] will consider social, economic, aesthetic, recreational and ecological values, wider aspects of land use in the coastal zone and an assessment of the impact of coastline hazards on future planning and land use.*

The CRPOM is described in more detail in Section 1.4.1.



Coastal Zone Management Plan for the Ballina Shire coastline V2  
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11.4 Coastal Zone Management Plan for the Ballina Shire Coastline

11.4 Coastal Zone Management Plan for the Ballina Shire Coastline

**Delivery Program** Engineering Works

**Objective** To obtain Council approval to exhibit the draft Coastal Zone Management Plan for public comment.

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**Background**

A workshop was held with Councillors on 28 November, 2012 which included an update on the progress of the draft Coastal Zone Management Plan (CZMP).

A draft Coastal Zone Management Plan was initially completed in 2010, however, redrafting was required in response to legislative changes. A copy of the revised plan has been provided to Councillors under separate cover.

The purpose of this report is to request Council's endorsement for public exhibition of the draft plan.

**Key Issues**

- Draft Coastal Zone Management Plan prepared for public exhibition and community feedback.

**Information**

*History*

Part of the 2010 draft Plan included a section dealing with emergency management for coastal erosion events. This section has now become a stand alone document, "Emergency Action Subplan for Coastal Erosion". This document was placed on public exhibition during July and August 2012, and was subsequently endorsed without receiving further public comment.

The 2010 draft Plan also needed to reconsider any implications arising from NSW State Government Sea Level Rise (SLR) benchmarks. The State Government adopted SLR benchmarks of 0.4m for 20150 and 0.9m for 2100 in late 2009. Council subsequently adopted these same benchmarks as policy at its Ordinary meeting of Council in November 2012 on the basis that the current State Government has rescinded its policy including the SLR benchmarks. Council has adopted the benchmarks due to the core scientific evidence presented by the previous State Government as being the best available information.

An update of the Coastal Hazard zones was undertaken for Lennox Head during 2011, using the 2050 and 2100 SLR benchmarks.

Although the draft CZMP describes coastal erosion along the Shire's coastline, the mapping of Coastal Hazard zones has only occurred at Lennox Head due to vulnerable public and private assets.

11.4 Coastal Zone Management Plan for the Ballina Shire Coastline

A letter report by BMT WBM (Attachment Two) describes the update of the Coastal Hazard assessment for Lennox Head. In summary, there has been accretion of sand since earlier assessments, being the Coastline Hazard Definition Study (WBM, 2003), however together with increased recession due to SLR, has resulted in hazard zones being similar to earlier assessments.

Overall the scope of the draft CZMP remains unchanged due to this assessment, and the draft document has accordingly been finalised.

As noted at the Councillor workshop, the Executive Summary of the draft CZMP provides a synopsis of the plan content, and this is provided as Attachment Three.

Previous Exhibition

As noted, the draft Coastal Zone Management Plan (CZMP) has been prepared for some time. The draft CZMP has undergone redrafting and background material has been updated to meet legislative changes.

Previously, the draft Coastal Zone Management Study was placed on public exhibition during 2008. The result of this public exhibition was reported to Council at a Civil Committee meeting, 9 July 2008. This report can be made available with a request to the Group Manager Civil Services, otherwise the agenda is located on Council's website.

The draft CZMP refers to the engagement of a Community Reference Group (CRG). The CRG was active during the preparation and public exhibition of the above study. However, following Council's endorsement to prepare a draft CZMP, the CRG has not been called upon to comment during the preparation of the draft plan.

Following the public exhibition of the study, there was also further feedback from some residents (Mr Connelly and Mr Thorpe) in relation to the extent of the 2050 and 2100 hazard zones.

This feedback related to the usage of the Hazard Definition Study (WBM, 2003) rather than the coastal zone management study. Further consultation did occur with Mr Connelly and Mr Thorpe, the State Government and the consultants. The outcome has been to continue with the methodology of calculating hazard lines as has been the case, however recognising the opportunity to improve as science and technology evolves.

For example, the consulting team has a staff member involved in computer based coastal modelling. A technical paper was presented to the 18<sup>th</sup> NSW Coastal Conference, 2009, dealing with the Richmond River training walls. This technical paper is presented as Attachment Four.

Although the draft CZMP does not specifically refer to the application of computer based modelling, the need to monitor and measure coastline changes may lead to such developments.

Overall the challenge for the draft CZMP will be the implementation of longer term protection works.

**11.4 Coastal Zone Management Plan for the Ballina Shire Coastline**

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Specific actions within the draft CZMP are summarised in tables in Section Four. These actions are comprised of:

- Monitoring – Table 4.2
- On going works – Table 4.3; and
- Long term works – Table 4.4

Copies of these Tables are included as Attachment Five. As shown in Table 4.4 the significant challenges for the plan will be the harnessing of stakeholder support and funding for planning and preparation, as well as implementation.

A further recommendation from the draft CZMP, which has not been itemised, refers to the need to update the current DCP for coastal hazards as it applies to the Lennox Head area. This will be amended for the exhibition version of the draft CZMP.

**Sustainability Considerations**

- **Environment**  
The draft CZMP are prepared in accordance with the principles set out in the Coastal Protection Act 1979 which includes environmental values.
- **Social**  
The draft CZMP are prepared in accordance with the principles set out in the Coastal Protection Act 1979 which includes social values.
- **Economic**  
The draft CZMP are prepared in accordance with the principles set out in the Coastal Protection Act 1979 which includes economic values.

**Legal / Resource / Financial Implications**

The preparation of the draft CZMP is a requirement of Council and is similar in process to the Floodplain Risk Management Study and Plan process. Furthermore the State Government has re-established a timeline for completion of the draft CZMP for the Lennox Head precinct (Attachment Six).

This follows on from previous reporting about the State Government requirements for completion of the Emergency Action Subplan for Coastal Erosion.

Resource and financial implications are significant considerations into the future, and will need to be implicitly included within further studies, planning and design development.

For the information of Councillors, some grant funds have already been secured from the rollout of the draft CZMP actions.

An amount of \$40,000 has been granted for the investigation of the buried seawall at Lennox Head, and an amount of \$30,000 has been granted for the completion of updating hazards and the draft CZMP, and in particular the review of the Lennox Head coastal DCP.



**11.4 Coastal Zone Management Plan for the Ballina Shire Coastline**

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**Consultation**

As noted previously in this report, a CRG has been active during the course of this project up to the completion of the draft coastal zone management study.

Furthermore, the Office of Environment and Heritage has been assisting with ongoing review of the draft CZMP with particular reference to the recent legislative changes and document requirements.

The public exhibition of the draft CZMP will require appropriate communication with the community to seek further public comment.

Given the specific interest of Mr Thorpe and Mr Connelly, a letter will be forwarded to these gentlemen advising of the changes and exhibition should Council endorse the recommendation.

**Options**

There is no option in regard to preparing a draft CZMP, in part due to Ministerial direction. Council can support changes or amendments to the draft CZMP, with the recommendation to proceed to exhibition.

**RECOMMENDATION**

That Council approves the exhibition of the draft Coastal Zone Management Plan for public comment.

**Attachment(s)**

1. Draft Coastal Zone Management Plan
2. Letter Report by BMT WMB
3. Executive Summary of the Draft CZMP
4. Technical Paper - Richmond River Training Walls
5. Tables from Section 4 of the Draft CZMP
6. Letter from Minister for the Environment - Timeline for Completion



Our Ref: 13/09694 DOC13/062573  
Your Ref:

4 July 2013

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



Attention: Paul Busmanis

Dear Paul

**Re: Draft Ballina Coastal Zone Management Plan**

I refer to your letter of 22 April 2013 regarding public exhibition of the draft Ballina Coastal Zone Management Plan (the CZMP). Thank you for the opportunity to provide feedback on the draft plan.

The following comments and additional information are offered for consideration;

**Contemporary Data**

1. Development of the CZMP has evolved over a lengthy period of time which has implications for relevancy of data, planning assumptions and stakeholder input that need to be considered. For example socio/economic data quoted in the analysis of social, recreation and tourism values is significantly out of date. Given the significance of cost/benefit analysis to support key recommendations in the CZMP it is important that contemporary data is used.

**Stakeholder Roles & Responsibilities**

1. It is important for the CZMP to recognise and clarify the jurisdiction of key stakeholders responsible for the public estate in the coastal zone. These include:
  - NSW Trade & Investment – Crown Lands
  - Marine Parks Authority (now Marine Estate Management Authority)
  - Ballina Shire Council (multiple roles under various legislation)
  - Ballina Coastal Reserve Trust (Ballina Shire Council appointed manager).
2. Further to the above point the CZMP must recognise the Trust as a separate corporate entity and clearly distinguish the separate roles of Council when

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](http://www.crownland.nsw.gov.au) | ABN: 335 377 620 19

nominating lead agencies in the management tables and making recommendations involving Ballina Coastal Reserve and other components of the Crown estate.

3. Multiple jurisdiction issues affect Cape Byron Marine Park due to land ownership. In essence the Marine Park has management control over the land with Crown Lands being the legal land owner.

#### **Ballina Coast Regional Crown Reserve**

1. A Regional Crown Reserve (RCR) is a strategic reservation that integrates all or most of the Crown land in a common geographic or local government area within a single overarching reservation. The Ballina Coast RCR is based on the coastal zone within the Ballina Local Government Area and amalgamates;
  - Existing reserves (including the Ballina Coastal Reserve)
  - Relevant leases and licenses
  - Beds of waterways to the limit of tidal influence
  - Submerged land to the 3 nautical mile State territorial limit
  - The intertidal zone
2. In keeping with its strategic function, a RCR is notified for multiple public purposes reflecting a wide spectrum of social, economic and environmental values. Ballina Coast Regional Crown Reserve comprises Reserve 1012188 for Access & Public Requirements, Rural Services, Tourism Purposes & Environmental and Heritage Conservation notified by gazette on 18 August 2006. Area: approx. 19,556 ha.
3. Note: Ballina Coast RCR excludes Cape Byron Marine Park.

#### **Relationship to other Plans & Planning Units**

1. Linkage with existing coastal planning is important and the strong connection in the CZMP with the adopted planning in place for the coastal Crown reserve system is acknowledged and supported. In addition to clarifying roles and responsibilities it is important for the draft CZMP to clearly articulate the nexus with the established and pending management plans for Crown land.
2. Coastal RCRs are unique for linking terrestrial and marine components of the Crown estate under a single statutory entity. This provides potential for more integrated governance arrangements and strategic management outcomes. This is a key consideration for the strategic delivery of CZMP recommendations.
3. The current tiers of Crown land planning for the Ballina coastline are;
  - The Ballina Coastal Reserve Plan of Management adopted 2003 and associated precinct plans (currently under review)
  - The Threatened Species (Pied Oystercatcher) Management Strategy February 2007 (covering threatened species & land management of South Ballina coastline)
  - Lake Ainsworth Crown Reserve Masterplan 2005
  - Draft Ballina Coast Regional Crown Reserve Plan of Management (currently in preparation)
4. Ballina Coastal Reserve PoM provides the management framework for the Ballina Coastal Reserve. The PoM is supported by precinct plans developed by Council in its capacity as appointed Manager of the Ballina Coastal Reserve Trust.

PAGE 2 OF 4

5. The draft CZMP also proposes a range of actions at the precinct level (using beach units) – many based on the existing Crown plans. However further clarification is needed to avoid confusion. For example, the emphasis in the CZMP for Ballina Pocket Beaches and South Ballina Beach units is on the Crown management regime. The Action Tables in the CZMP seek to apply the Ballina Coastal Reserve PoM precinct planning regime to the South Ballina Beach unit which is not a precinct of the Ballina Coastal Reserve and is primarily under the separate jurisdiction of Crown Lands.
6. It is important to note Ballina Coastal Reserve PoM is under review as part of the preparation of a draft Ballina Coast RCR PoM in partnership with Council. We wish to stress the importance of the CZMP effectively informing the Crown planning that is underway rather than appearing to reflect the status quo. For example, the issue of marine debris in the intertidal zone is not adequately covered elsewhere and should be addressed by the CZMP.
7. The impact of training walls at the mouth of Richmond River does not appear to be effectively addressed. It is suggested the draft CZMP should have stronger links with the Richmond River Estuary CZMP.

**Option Assessment & Alignment with NSW Government Policy**

1. The use of offshore sand for beach nourishment in conjunction with sea walls for Lennox Head - North & South beach units is a key management option. However, it is considered the CZMP fails to effectively bring forward the rationale from the Coastal Management Study to support this option (particularly with respect to critical cost/benefit considerations).
2. In adopting the beach nourishment/sea wall option, the CZMP concludes that a merit-based approval path remains open for the use of off-shore sand however the level of support for the use of off-shore sand by the NSW Government is currently unclear. The failure to adequately articulate the position of Government in the options assessment is a significant shortcoming of the CZMP. Further engagement with key government stakeholders including Crown Lands is necessary at this point to provide a sounder platform on which to base this option.
3. The financial assessment of some options are based on assumptions relating to the role and commitment of Government that may not necessarily be valid, for example, acquisition by Government of private property affected by coastal erosion.
4. Given the lack of a clear policy platform for off shore sand use at this stage it would be prudent for the CZMP to clarify the place of contingency options drawn from the Study.

**Suggested Edits & Formatting**

1. Amend wording of Sec 1.4 Para 2 to clarify preparation of the original Ballina Coastal Reserve PoM by the then Department of Land & Water Conservation (DLWC) - not Council as stated (c/w statements quoted in Sec 1.2.2.2).
2. The format of the CZMP management table does not clearly link recommended actions with their strategic drivers.

If you require any further clarification or assistance with this matter please don't hesitate to contact Mr Peter Baumann by Ph: (02) 66403401.

Yours sincerely



Tony Broderick  
Team Leader Planning & Operations  
Far North Coast

8/07/2013

PAGE 4 OF 4