



Office of Environment and Heritage comments on
Draft Coastal Zone Management Plan for the Ballina Shire Coastline V3 (April 2013)
 North Coast Unit, Alstonville NSW
 6 September 2013

The following comments in Table 1 are provided to Ballina Shire Council to assist in its finalisation of the Draft Coastal Zone Management Plan for the Ballina Shire Coastline (CZMP). The NSW Government is currently amid its Stage two coastal reforms. It is currently unclear what implications these reforms may have on the NSW coastal management legislative and policy framework. It is also currently unclear as to when these reforms will be finalised.

Table 1 – Comments on Draft CZMP for Ballina Shire Coastline

Comment #	CZMP Section	Comment
1.	General Comment	(Note: Where relevant, recommend adding text in bold italics and deleting text with strikethrough) The NSW Government has withdrawn the NSW Sea Level Rise Policy Statement (2009) and therefore no longer recommends sea level rise projections for Councils. It is recommended that reference to the Sea Level Rise Policy Statement throughout the draft CZMP be re-considered with regard to the withdrawal of this Government policy.
2.	General Comment	Reference throughout the document to the Guidelines for Preparing Coastal Zone Management Plans (DECCW, 2012) may be amended to OEH (2013). These guidelines were recently updated (2013) to remove reference to the now redundant NSW Sea Level Rise Policy Statement (DECCW 2009).
3.	Section 1.5.3	<ul style="list-style-type: none"> ▪ First sentence – Recommend “NSW Department of Premier and Cabinet that is the lead agency in implementing developing government policies....” ▪ Please identify under this section that OEH have also jointly funded the CZMP (as is mentioned for the NDMP under section 1.5.4)
4.	Section 1.5.5	It is recommended this section includes description of the most recent public consultation exercises.



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5.	Section 3.1	<p>(Note: Where relevant, recommend adding text in bold italics and deleting text with strikethrough)</p> <p>Section 3.1 only discusses the management of coastal hazards. It does not highlight the important CZMP management issues of 'Community Uses' and 'Ecosystem Health' as is prescribed in the Guidelines for Preparing Coastal Zone Management Plans (OEH 2013). The Executive Summary (Page vii, fourth paragraph) describes how the CZMP covers the management of coastal ecosystems and community uses. These management themes should also be discussed under section 3.1 which introduces the "Recommended Management Actions".</p>
6.	Section 3.4	Please refer to Attachment 1 for recommended edits to Section 3.4 of the CZMP and other relevant sections and management actions throughout.
7.	Section 3.4.3.1	With regard to the statement "Sand nourishment is the primary means by which assets will be protected under this CZMP" please refer to Attachment 1 .
8.	Section 3.4.3.1	<p>Discussion on offshore sand source investigation may be embellished with investigations into possible sources as identified in Attachment 1 and comment #10 below. Additional comments follow.</p> <p>a) The key considerations discussed under section 3.4.3.1 (paragraph 2, p40) should be amended to reflect that sand for beach nourishment may be appropriately located within the active system subject to consideration of the possible impacts (i.e. dredged material from the Richmond River entrance).</p> <p>b) Fifth dot-point under paragraph 2 refers to government policies and regulatory requirements not allowing for the operation of sourcing nourishment sand from offshore. This is not necessarily true and is unsubstantiated. It is recommended this statement be amended to more accurately reflect that an approvals assessment would need to be undertaken for any such proposal, and that the current policy framework is somewhat uncertain.</p> <p>c) It is recommended that discussion on the required depth of sand for possible extraction be removed as it is somewhat presumptuous given that it may indeed be deemed appropriate (at the time of assessment) to redistribute sand within the littoral system (i.e. fifth paragraph, last sentence). This level of detail should be considered as part of the formal investigation into the availability of sand for sand nourishment, as an action of the CZMP (i.e. Management Action 2013/1). It is not considered necessary for the CZMP to prescribe the depth and logistics of any sand nourishment scheme but rather might just set the framework for investigations into the locations and availability of suitable sand and the timing for nourishment (refer comment #11 below).</p> <p>d) Page 41, fourth paragraph – This discussion on the NSW Government policy on offshore sand extraction should be better contextualised in terms of the offshore extraction for commercial purposes is not supported. There is not</p>



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		<p>(Note: Where relevant, recommend adding text in bold italics and deleting text with throughout)</p> <p>necessarily a prohibition on offshore extraction for non-commercial purposes (i.e. Tweed Sand Bypass project).</p> <p>e) Page 42, first paragraph, first sentence – This statement should be re-considered in light of comments above.</p>
9.	Section 3.4.3.2	<p>a) Page 42, Photogrammetric Analysis, second paragraph, first sentence – Recommend "... to be undertaken at the same frequency for this beach unit into the future in order to monitor underlying trends until a sufficiently clear trend has been established".</p> <p>b) Page 43, Land Based Surveys – It is recommended that land based surveys be conducted (if conducted) along the same profiles as the OEH photogrammetric profiles. This will allow direct use and comparison of the data where possible. OEH can provide BSC with the profile locations as GPS co-ordinates.</p> <p>c) Bathymetric Surveys, Page 44 – It should be noted that OEH undertakes bathymetric surveys using its own vessels from time to time. There is also OEH LADS data for Seven Mile Beach to a depth of approximately 30m which was captured in 2011. LADS data is typically of higher resolution than traditional hydrographic surveys and may be undertaken into the future by OEH on a needs basis.</p>
10.	Section 3.4.4	<p>a) Second paragraph – It is recommended that the interpretation of the Coastal Protection Act, 1979 be softened a little. Council is strongly encouraged to strive to achieve the overarching objectives of the Act and NSW Coastal Policy (1997), however, it must be acknowledged that there is some uncertainty in its ability to fully meet all objectives under economic and logistic constraints related to management of coastal hazards.</p> <p>Recommend for example - "If a seawall is used without beach nourishment, in the medium to longer term, the landward movement of the beach and dune will manifest in a lowering and narrowing of the beach against the seawall, impacting on environmental and recreational amenity which would may be contrary to the overarching objectives of the CP Act and the recreational and amenity needs of the local community."</p> <p>b) Last paragraph (top of p47) – Please refer to comments at Attachment 1.</p>
11.	Section 3.4.4.1	<p>a) The work put into determining a nourishment trigger mechanism which seeks to ensure that a storm demand sand buffer (200m³/m) is maintained seaward of the buried (or upgraded) seawall for beach amenity and hazard mitigation purposes is appreciated. However, the reliance on sand nourishment as the primary means of defence is not considered realistically achievable or justifiably necessary over the short term due to uncertainties on sand source and funding (among other potential logistical constraints). This issue is discussed in Attachment 1 which advocates that the key priority of the CZMP should be to ultimately investigate and upgrade the existing protection works along</p>



Comment #	CZMP Section	Comment
		<p>(Note: Where relevant, recommend adding text in bold italics and deleting text with strikethrough)</p> <p>the length of the beach front to an engineering standard. That is, large scale nourishment need not be triggered in this current CZMP as the primary means of protection. It also need not be triggered for beach amenity provision at this stage as the <i>"necessity for the scale and immediate application of the quantities advised is not yet evident"</i> (refer Attachment 1)</p> <p>In light of the above and the information provided in Attachment 1, the CZMP should acknowledge that until a sand nourishment source and means is identified through the relevant investigations, the presence of the buried/upgraded seawall may during erosive times temporarily result in loss of beach access and/or amenity. However, over the short term this is expected to be only a temporary impact until a beach recovery phase re-establishes. The acknowledgement of this possible temporary impact over the short-term is of course accompanied by recognition that Council will be progressing investigations into beach nourishment to attempt to mitigate such impacts into the future.</p> <p>Once sand sources for both small scale and/or large scale beach nourishment are determined, the cost, logistics, and approvals may then be considered. In the shorter-term, smaller scale nourishment might be implemented on the basis of the availability of sand or dredge for nourishment (i.e. Richmond River dredged material). Of course, smaller scale nourishment may be appropriate prior to the sea wall being upgraded if/when material becomes available (i.e. dredged sands from the Richmond River) in order to increase inshore sand volumes thus reducing coastal hazard threat, improve beach amenity and beach access. In the medium to longer-term, the investigations into sand nourishment (as required in CZMP) should provide some guidance into the feasibility and logistics of larger scale or more frequent smaller scale nourishment.</p> <p>Under this approach, the seawall is the primary means of Council's adopted protection philosophy for Seven Mile Beach (refer Attachment 1), and nourishment will be investigated and implemented where possible to mitigate the impacts of the seawall in accordance with the overarching objectives of the NSW Coastal Protection Act and Coastal Policy.</p> <p>b) Page 49 – It is recommended that the discussion on Page 49 be contextualised under a heading such as "Longer-term Large Scale Beach Nourishment". It is recommended this discussion be slightly re-framed as a "possible future scenario" subject to coastal recession trends, future sea level rise and its impact on the coast, and in addition to the design considerations already listed in paragraph 1.</p> <p>It is also recommended discussion on the shorter term management approach as detailed in Attachment 1 and comment #11a above be included under a heading such as "Shorter-term small scale beach nourishment" (or similar). This proposed discussion should briefly explore less voluminous nourishment opportunities which are advocated until the feasibility of and necessity for large scale nourishment becomes clear.</p>



Comment #	CZMP Section	Comment
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12.	Section 3.4.4.3	Please refer to Attachment 1 and comment #11 above for considerations relating to this section.
13.	Section 3.5	Please refer to Attachment 1 and comment #11 above for considerations relating to this section.
14.	Table 4.1	Code S1 – Please replace wording about the Coastal Management Program with "Under the Coastal Management Program, the NSW Government provides coastal management grants to support local government in managing the risks from coastal hazards, such as coastal erosion, and restoring degraded coastal habitats. The grants are offered on a 1:1 funding ratio."
15.	Table 4.4	Action 2013/1 – This action may be more cost effectively achieved via collaboration with other Council's in the North coast region (i.e. Byron and Tweed). This approach might be suitably identified in the Management Action description.
16.	Table 4.4	Recommend the timing and scope of relevant management actions in this table be re-considered with regard comments in Attachment 1 and in #11 above.



Attachment 1: Email from Phil Watson (OEH) to Ben Fitzgibbon (OEH) regarding draft CZMP for the Ballina Shire Coastline V3.

Fitzgibbon Ben

From: Watson Phil
Sent: Thursday, 15 August 2013 9:47 AM
To: Fitzgibbon Ben; Chin Toong
Subject: Ballina CZMP

Hi Ben and Toong,

Reference is made to previous discussions, meetings with Council staff and the consultant and the Councillor Workshop on Tuesday 13 August 2013 pertaining to the development of the Ballina CZMP.

I thought it might be beneficial to summarise those views, particularly given the Council and OEH now have a clear picture of the relatively minor "tweaking" required to deliver a sound, pragmatic and implementable Plan.

At present the Plan is contingent on a large artificial nourishment of the beach (200m³/m run of beach) in front of the existing protection structures to form the primary line of defence for Lennox Head. This presents problems for a range of reasons, not the least of which is that there is currently no identified, readily accessible sand source, nor is there a funding model to service this action. In effect, this deems the CZMP somewhat untenable. Whilst the idea of nourishing Seven Mile Beach for amenity provision is welcomed and widely supported by council and the community, the necessity for the scale and immediate application of the quantities advised is not yet evident. Such an action should be considered and further investigated over time in the event the large projected sea level rise forecast over the course of the 21st century are realised.

However, over the short-medium term there would be more likelihood of adequately meeting the comparatively limited demand for amenity enhancement by linking opportunistic navigation dredging exercises in and around the Richmond River to nourishment of Seven Mile Beach as a spoil disposal option. With current low rates of sea level rise of the order of a couple of millimetres a year projected over the next decade or two, it is highly likely that opportunity maintenance dredging of the Richmond would provide sufficient clean sandy spoil to meet amenity enhancement requirements along Seven Mile Beach over this time-frame. Longer-term planning horizons and larger projected rates of sea level rise might necessitate the larger scale of offshore dredging of sand to meet nourishment demands for amenity provision currently embodied within the Plan. However, these activities can be investigated and phased over time to accord with both demand and relevant changes to Government Policy and funding models that might be necessary to make such large capital works financially sustainable.

Given Council and the community have unilaterally endorsed protection as the recommended long-term management strategy for Seven Mile Beach, the key priority should be to ultimately investigate and upgrade existing protection works along the length of the beachfront to a consistent and appropriate engineering standard (as advocated in the plan). The keen necessity to enhance degraded beach amenity through the use of artificial sand nourishment is also strongly endorsed, however, I would advocate this can be done more pragmatically and efficiently via the afore-mentioned staged mechanisms. This slight "tweaking" of the CZMP to accord with this appeared to be keenly endorsed at the Councillor workshop.

Happy to discuss further as necessary.

Best wishes

Phil

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