

20 January 2017

Director of Environment and Building Policy
Department of Planning and Environment NSW
GPO Box 39
Sydney NSW 2001

Dear Sir/Madam,

PIA (NSW) SUBMISSION COASTAL REFORM PACKAGE

The Planning Institute of Australia (PIA) supports the Department's progress in combining matters relating to coastal management into a single reform package and State Environmental Planning Policy. PIA provided a comprehensive submission in February 2016 (attached) which remains relevant.

PIA have taken this opportunity to highlight several points raised in our submission that have not been fully covered in the reforms on exhibition. PIA are concerned that the proposed approach risks divergent and poorly integrated approaches for addressing coastal hazards in local environmental plans among different LGAs and ask that the following points be taking into consideration:

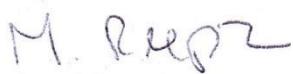
1. That the State Government restore formal predictions and policies for sea level rise and climate change to enable proper planning relative to predicted sea level rise inundation in 50-year and 100-year planning horizons and to address the risks and liabilities which Councils are exposed to if such predictions and policies are not formally in place (PIA Rec 9.7).
2. That the DPE with the OEH review all coastal Regional Plans to further incorporate aspects of coastal management policies. This will give enhanced direction to NSW Coastal Councils for the implementation of LEPs and coastal planning in a compatible co-ordinated manner. The future drafting of regional plans should also be conducted on the same basis. Joint Regional Planning Panels should have the role of monitoring regional consistency of the implementation of such coastal planning policies and development application decision making within relevant regions (PIA Rec 9.12).
3. PIA supports the increased integration of coastal management and planning into Council's Integrated Planning and Reporting framework and to address the current disconnect between current coastal management processes and the integrated planning and reporting process. PIA are concerned that different approaches (eg use of various SILEP zones) may be used inconsistently across NSW. Due acknowledgement must also be given to the implications for Council funding capabilities and budgets, given that many budget constrained Councils will not be able to afford levels of capital and maintenance expenditures that will be needed to fulfil some of the objectives and needs for coastal management (PIA Rec 9.8). In particular, PIA are

concerned at the potential burden placed on individual councils of using planning proposals to amend the SEPP where required to adjust wetland / littoral rainforest boundaries.

4. PIA believe that there is the potential for perverse outcomes if the capacity for beach nourishment is used as a DA merit assessment criteria for proposals that might otherwise not be supported due to their vulnerability. PIA recommend that this not be included as matter for consideration.
5. Consideration should be given to two categories of coastal vulnerability areas in order to give special attention to more acutely vulnerable "hot spots" listed by OEH based upon risk management, predicted sea level rise inundation and implications for meeting the 50-year design life under the BCA and implications for the local Council's Asset Management Planning and Emergency Response Capabilities (examples include Belongil, Wamberal, Collaroy-Narrabeen) (PIA rec 9.4).

Should you wish to discuss our submission please contact John Brockhoff on john.brockhoff@planning.org.au or 0400 953 025.

Yours sincerely,



Michelle Riepsamen
Executive Officer, PIA NSW