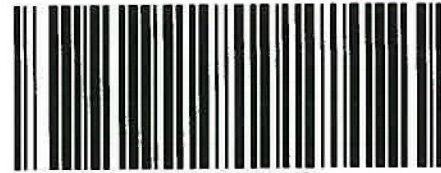


## SECRETARY'S CORRESPONDENCE



PMU051953

### PRIORITY:

☐

URGENT

Date due: / /

☐

Early (2 weeks)

### ACTION REQUIRED:

#### DRAFT LETTER FOR SIGNATURE BY:

Secretary

(Full brief ☐

Short Brief ☐

☐

Deputy Secretary

☐

Executive Director

☐

Director

☐

General Manager

☐

BRIEFING NOTES FOR SECRETARY

☐

DISCUSSION WITH SECRETARY

☐

DEPARTMENTAL ACTION

☒

INFORMATION ONLY

☐

OTHER:

☐

### INSTRUCTIONS/COMMENTS

☒

Division

☐

CCU

☐

GD&P

☐

Gen Csel

☐

Richard Hammond

☒

Pol & Strat

☐

C&SE

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Vincent Blake

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Plan Serv

☐

Martin Walsh

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Fin & Ops

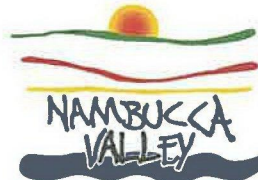
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Faun Harbord

Branch

Environment and Building Policy

# Nambucca Shire Council



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Our Ref: SF669

19 December 2016

The Secretary  
Department of Planning & Environment  
GPO Box 39  
SYDNEY NSW 2001

Dear Sir/Madam

## **SUBMISSION – COASTAL REFORMS**

On 15 December 2016 Nambucca Shire Council resolved to make the following submission to your Department's draft Coastal Reforms.

### Introductory comments

Council supports the consolidation of SEPP 14 (Coastal Wetlands), SEPP 26 (Littoral Rainforests) and SEPP 71 (Coastal Protection) into one Coastal Management SEPP.

Council supports balancing social, economic and environmental interests by promoting a coordinated approach to coastal management.

### Coastal Wetlands and Littoral Rainforests Area

Council supports the objectives for this area and most of the ways development will be managed in this area, however, believes that controls within the proximity area need to apply to land zoned for residential purposes. Residential development certainly has the potential to damage sensitive environmental communities, even if it is only proximate to it, due, for example, to stormwater runoff.

Council does not support all development within this area being designated development. An exemption to this requirement should be minor boundary adjustments where the adjustment does not fragment the wetland/rainforest area.

### Coastal Environment Area

Council generally supports the purpose, objectives and management of this area, however, is concerned at the arbitrary measures used to define this area. Council is concerned that it will be left to it to find the time, money and resources to more accurately define this area, instead of mapping being done accurately by the State Government prior to the SEPP being enacted.



### Coastal Vulnerability Area

Council generally supports the purpose, objectives, management and definition of this area, however, expresses some concern at a possible need to update mapped hazards in the next five years. Considerable time and effort has already gone into mapping local hazards, so it is hoped that further work in the immediate future will prove to be unnecessary.

### Coastal Use Area

Council generally supports the purpose, objectives and management of this area, but has serious reservations as to the criteria used to map this area which, for Nambucca Shire Council, has led to the village of Bowraville being included as "coastal use area". Such an inclusion seems completely unnecessary given the objectives for this area. If areas such as Bowraville remain mapped, this will lead to an increase in the amount of time taken to determine development applications, as consideration will need to be given to this SEPP when assessing applications in these areas. For similar reasons, time will be increased when preparing Planning Proposals for these areas

Council further notes that the coastal use area in the Sydney metropolitan area and from Northern Beaches to Sutherland Councils has been determined differently and far more sensibly. Council questions why similar measures were not used for this Council area and why it will be up to Council to correct these anomalies. As the State Government is committed to reducing red tape and making the development process smoother, it seems appropriate that they spend the necessary time producing accurate and reasonable mapping, rather than leaving this to be corrected by Council at a later date.

### Coastal Protection Works

Council is concerned about the proposal for some Coastal Protection Works (CPW) to require consent from the Joint Regional Planning Panel, particularly as our Estuary Management Plan may not be a certified Coastal Management Plan. Adding this unnecessary step to carry out CPW will cost Council time and money. To avoid the need for this type of approval, Council will need to undertake more studies to ensure that all CPW are included in a certified Coastal Management Plan. Council already consults with experts in NSW Office of Environment & Heritage and NSW Department of Primary Industries - Fisheries and obtains all permits required so that CPW are carried out in such a way that the environment is protected.

Thank you for the opportunity to make a submission concerning these proposed reforms. Council looks forward to receiving your positive response.

Yours faithfully



**Daniel Walsh**  
**MANAGER DEVELOPMENT & ENVIRONMENT**