

Responses to submissions about the draft Open Coast Coastal Management program

Issue raised	Proposed changes to draft Open Coast CMP
<p>A sea level rise trigger point should be used to address coastal hazards risk rather than the coastal vulnerability area maps.</p> <p>Concern the coastal hazard risk is up to 80 years away and that it is being identified as a hazard now.</p>	<p>No change proposed.</p> <p>The coastal hazard mapping includes coastal risks over a time period that needs to be considered in planning and development of these areas now. For example a new house built in 2023 is likely to still be in use in 2100. Therefore, it needs to be built in a way that is compatible with the coastal risk in 2100. Waiting for further sea level rise to occur (ie. until a trigger point is reached) before implementing suitable development controls, will leave any development occurring in the interim exposed to future coastal hazards.</p> <p>Using a sea level rise trigger point before requiring development to consider coastal hazards is not appropriate because:</p> <ul style="list-style-type: none"> • It does not align with the requirements of the NSW legislative and policy framework for managing coastal areas, and therefore Council has no protection or justification if choosing this approach. • A trigger point based on sea level measurements would still require mapping to indicate where these triggers apply. • Relying upon a trigger level is inappropriate because coastal hazards do not start when a trigger is reached. Coastal hazards already exist; there could be gradual increases in the extent of erosion or inundation events and/or a single large event could occur at any time resulting in coastal hazard impacts before an arbitrary trigger is reached.
<p>Concern that recognition of coastal hazards could affect property values and insurance costs</p>	<p>No change proposed.</p> <p>Insurance companies calculate insurance on a multitude of factors and do not rely upon local government data. Further, coastal hazards have been considered by the Interim Coastal Hazard code since 2015 and hazard mapping has been publicly available for the Eurobodalla Shire since 2017 - in that time property prices have significantly increased.</p>

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<p>Funds should be used to protect the coastline in ways that benefit everyone, not just waterfront property owners. This should include protection of the natural environment.</p>	<p>No change proposed.</p> <p>All coastal hazard protection works in the CMP are designed to manage risk to Council assets (roads, infrastructure and utilities that sit behind these) or areas of significant public value, such as the CBD in Batemans Bay or beach reserves that the community hold in high value.</p> <p>Other management approaches, such as dune management, sand nourishment and development controls are included in the CMP to protect private properties.</p> <p>In addition, the CMP provides a range of actions other than those aimed at mitigating coastal hazards. These include actions to support a range of coastal values, healthy environment, recreational and social use, Aboriginal cultural heritage and use, and economic values.</p>
<p>Request for clarity on previously made commitments of \$250,000 for studies to identify solutions to coastal hazards and of \$5M for protection work for Northern Batemans Bay</p>	<p>No change proposed.</p> <p>\$250,000 was used to prepare this draft Open Coast CMP. The draft Open Coast CMP identifies the following coastal protection works for the \$5M to be spent on:</p> <ul style="list-style-type: none"> • \$2.4M for protection of Wharf Road and remediation of adjoining land for public use and access (CH1_Ka Phase 1 and 2) • \$1.5M for protection of Surfside from coastal inundation (CH4_D Phase 1) • \$1.1 for protection of Bay Road, Long Beach from beach erosion (CH1_D Phase 1 and Phase 2). This action will also receive contribution of funds from Council and the NSW Coastal and Estuary Grants Program.
<p>Residents should not have to pay for actions ie. do not include a coastal protection charges/levy or special rates.</p>	<p>No change proposed.</p> <p>The draft Open Coast CMP Business Plan identifies the funding source for all actions. This includes a combination of NSW and Local Government funding. No private landowner direct funding is proposed. The draft Open Coast CMP does not propose a levy or special rates to fund the works.</p>
<p>Exhibition too short. Community needs more time to consider the draft CMP. There has not been enough consultation.</p>	<p>No change proposed.</p> <p>The exhibition period was extended by 14 days to allow for more time for community to read the draft CMP. The extensive consultation process undertaken in the preparation of the CMP is described in the Engagement Plan (Attachment A of the draft Open Coast CMP).</p>

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Support for specific actions	<p>No change proposed.</p> <p>Support included reference to the following actions that remain in the revised draft Open Coast CMP:</p> <ul style="list-style-type: none"> • Coastal protection proposed for Surfside • Coastal protection proposed McKenzies Beach • The Coastal Zone Emergency Action Subplan • Actions that address coastal development threats (CD1-3) • An update of property development planning controls and undertake Planning proposal to adopt CVA (CHA_A) • Actions that address engagement and governance threats involving traditional owners (EGC4) • Action to promote, support and undertake citizen science (EGC2_B)
Perception that historic infrastructure works causes erosion at Surfside and enquiries into what the cause of erosion is.	<p>The Stage 2 report (Appendix B of the CMP) now includes additional information on the sediment transport processes within Batemans Bay.</p> <p>The Stage 2 report notes that the training wall along the southern side of Batemans Bay has resulted in a large transformation of the embayment of Batemans Bay since its construction.</p> <p>Most notably the significant and rapid accretion of the southern shoreline to form Corrigans Beach, scouring of the Clyde River channel and seaward relocation of the entrance bar. The impact of this structure on the northern side of the bay is less evident, as it is concluded that the landform and nearshore shoal features along the northern shoreline of Batemans Bay is dynamic and cyclical, dominated by flood and coastal processes notwithstanding historical works.</p> <p>This is evident in the historical data including bathymetry dating back to 1864 (ie. prior to the training wall along the CBD), showing cyclical landform and shoal changes as a result of flood flows and sand replenishment via coastal processes (waves and tides). The ‘condition’ of the shoals and beaches along the northern shoreline appear linked to broader climatic cycles where stormy/wet periods (La Niña periods) result in a more eroded condition and extended calmer/dryer periods. (El Niño periods) result in a more accreted condition. Over the last 10-15 years there have been a number La Niña periods with only short El Niño periods between. As such the northern shorelines have tended toward a more eroded condition over this time.</p> <p>The actions in the draft Open Coast CMP adequately considers the naturally dynamic processes that are the principal driver for observed shoreline change, particularly in northern Batemans Bay.</p>

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<p>Concern some of the proposed works to mitigate erosion on the northern shoreline are short-term in nature eg. beach nourishment at Surfside and Long Beach</p>	<p>No change proposed.</p> <p>A range of coastal management options were investigated for the Surfside area as part of the CMP by coastal engineers, environmental scientists and economists to identify the most suitable outcomes for inclusion in the CMP business plan (to be implemented over the next 10 years). This investigation included consideration of sediment transport processes, coastal wind and wave action, flood flows from the Clyde River, over 100 years of aerial photography of the area, community preference, environmental impacts and costs.</p> <p>There are a range of short and long term solutions, combining 'soft' management approaches such as sand nourishment and revegetation, and 'hard' engineering solutions (such as revetments, levees and rock protection).</p> <p>Examples of 'soft' solutions to coastal hazards:</p> <ul style="list-style-type: none"> • Action CH4_D includes dune management to ensure the dune at Surfside Beach provides adequate protection from coastal inundation. The action has been updated to specify that sand nourishment (from imported sand) will be undertaken to raise the dune crest height in low sections and revegetation undertaken to stabilise existing and imported sand. • Beach nourishment will be undertaken at Northern Batemans Bay Beaches when sand is available from Clyde River navigation dredging (Action CH1_L). This means timing will depend on when the NSW Government undertakes dredging. • The Coastal Zone Emergency Action Subplan (CZEAS) allows for 'beach scraping' to be undertaken as part of a coastal erosion event recovery and can be done to support recovery of beach erosion for the length of beach in front of Bay Road (not only the eastern end). • A frontal dune management plan will be prepared for Maloneys Beach, Long Beach, and Surfside (Action CH9_A) to optimise resilience of the dunes as protection for temporary land uses and enhance ecological connectivity. • CH1_M Purchase private properties at Wharf Road to assure current and future generations have public access to the foreshore and beaches <p>Examples of 'hard' engineering solutions to coastal hazards:</p> <ul style="list-style-type: none"> • CH1_D Protection of Bay Road, Long Beach from Coastal Erosion • CH1_ZC Coastal erosion structure at Surfside Creek outlet • CH4_D Coastal inundation levee • CH1_Ka Wharf Road erosion protection works • CH1_Ka Wharf Road inundation protection works • CH1_Kc Raising of Wharf Road
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	<ul style="list-style-type: none"> CH4_G Installation of flood gates to protect Wharf Road and surrounding properties from surcharge during a coastal storm
<p>Concern that actions such as beach nourishment may impact on aquatic and benthic ecosystems.</p>	<p>No change proposed.</p> <p>All actions that involve works in the coastal zone will undergo a design phase involving environmental assessments to identify and mitigate environmental impacts.</p> <p>An environmental assessment must be completed before beach nourishment can take place. For example, Council prepared a Review of Environmental Factors before undertaking beach scraping works at Long Beach earlier in 2022.</p> <p>The detailed design of seawalls has not been completed. Living seawall designs to include habitat for aquatic organisms will be considered and implemented where appropriate.</p>
<p>Will future landholders be made aware of the coastal risks associated with their new property?</p>	<p>No change proposed.</p> <p>If the Coastal Hazards Code applies to a property, it will be noted on a s10.7 planning certificate. This notation has applied on planning certificates since 2015.</p> <p>The coastal vulnerability area to which the Code applies will be able to be viewed on Council's online mapping tool.</p>
<p>Concern that the coastal vulnerability area mapping will be used for rezoning.</p>	<p>No change proposed.</p> <p>Council is not proposing to rezone any properties as a result of the Open Coast CMP.</p> <p>The Open Coast CMP proposes to undertake a planning proposal process to add the coastal vulnerability area (CVA) map to the NSW State Environmental Planning Policy (SEPP) (Resilience and Hazards). When this is completed:</p> <ul style="list-style-type: none"> properties with coastal hazards will continue to have a notation on the s10.7 planning certificate the CVA map will be able to be viewed on the NSW planning portal spatial viewer as well as on Council's online mapping tool.

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<p>Unclear what sort of development the draft Coastal Hazards Code would apply to.</p>	<p>No change proposed.</p> <p>The draft Coastal Hazard Code identifies that it applies to any development that requires a development application to Council. The draft CVA map identifies the area in which a development needs to consider the risk of coastal hazards. The draft Code provides guidance on how to demonstrate the development has been designed to avoid and minimise the risk of coastal hazards.</p> <p>Exempt development can continue in areas that are mapped as a coastal vulnerability area. However, complying development cannot be undertaken in a coastal vulnerability area and a development application will be required.</p>
<p>Minor wording amendments to Coastal Zone Emergency Action Subplan (CZEAS) to accurately reflect roles and responsibilities of The Bureau of Meteorology</p>	<p>Minor wording amendments to CZEAS including:</p> <ul style="list-style-type: none"> • Replace “BoM” with Bureau. • Clarify that Severe Weather Warnings (SWW) are for stretches of the coast (eg. from Eden to Port Kembla). The SWW will not mention any of the Eurobodalla locations by name, unless this is the location the large surf may start or end. • Clarify that coordinating 24 weather warnings is part of <i>preparedness</i>, and issuing warnings is part of <i>response</i> actions. • Clarify that the Bureau does not communicate warnings directly to community groups (eg. Aboriginal community, LALCs or residents).
<p>Long Beach coastal protection works should focus on the existing risk area (recently eroded) first.</p> <p>The action in the CMP should allow for more flexibility in the design and include engagement with the community in the design process.</p> <p>Several submissions highlighted the importance of a design that minimised impact on amenity and access, while providing long term protection of Bay Road and associated services and assets.</p>	<p>Council met with Long Beach community members on two occasions during the public exhibition period (in addition to engagement during the preparation of the draft Open Coast CMP). As a result of feedback during these meetings and submissions received, Action CH1_D was updated to:</p> <ul style="list-style-type: none"> • Focus the priority works on the 200m at the eastern end of Long Beach, considering the extent of the existing rock revetment • Clarify the importance of continued engagement with the local community as part of the investigation and design phase • Highlight the important design aspects raised by community members to be considered in the investigation and design phase.
<p>Repair and maintain Narooma breakwall</p>	<p>No change proposed.</p> <p>Action EGC3_F includes the condition assessment and maintenance of marine assets (including the Narooma breakwall) by the NSW Marine Infrastructure Development Office (MIDO).</p>

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<p>Add recommendations on how to preserve wildlife along the coast eg. Shorebird nesting sites are not identified, regulating dogs and walkers would be a high priority for bird nesting areas.</p>	<p>No change proposed.</p> <p>There are several actions within the CMP which aim to protect and enhance wildlife along the coast, including the following examples:</p> <ul style="list-style-type: none"> • CD1_A Snapper Island Penguin monitoring program • EGC2_A Installation of signage to reduce illegal ICOLL openings, which can have a significant impact on estuarine habitats • CD1_B and RA2_E Dune vegetation management • CD1_C and RA2_G Weed management • CD3_C Mangrove and saltmarsh protection • RA2_E Shorebird management • RA2_F Support and funding for Coastcare and Landcare projects • RA6_A Manage cyclist impacts on habitat <p>The specific location of shorebirds does not need to be included in the action RA2_E regarding their continued management. This information is known by the responsible agencies that will implement this action and can change over time.</p> <p>There is existing signage on beaches and clear information about dog-friendly beaches is available on Council's website to guide and clearly convey the appropriate locations and times for walking dogs on beaches. Council already considers the impact dogs on beaches may have on shorebirds as part of the Companion Animals Management Plan (CAMP) adopted by Council in 2018.</p>

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<p>Limited reference is made to ICOLL and waterway health in this CMP eg. Coila Lake and Mummaga Lake ICOLLS</p>	<p>No change proposed.</p> <p>This CMP covers the coastline and not the ICOLLS's (beyond the entrance, as each entrance is within the coastline) or many smaller waterways in Eurobodalla. Coastal Management Programs must be very prescriptive in the area covered in their scope. Because of this we currently have separate CMPs for estuaries, open coast and separate waterways. Separate studies can cover these areas.</p> <p>Action CH8_B is to review ICOLL opening management plans for Council managed ICOLLS (South Durras, Surfside, Joes Creek, Short Beach, Wimbie Beach, Kianga, Little Lake (Narooma), Nangudga Lake).</p> <p>Action CH8_C is to finalise the ICOLL opening management plans for National Parks and Wildlife Service (NPWS) management ICOLLS (Congo, Potato Point, Lake Brou, Corunna Lake)</p> <p>Lake Mummaga Entrance Management Policy is being developed by NPWS. The Eurobodalla Estuaries CMP (recently adopted by Council) supports the development of the opening strategy.</p> <p>An Entrance Manage Policy for Tuross and Coila will be undertaken as part of Council's Tuross and Coila Lake Coastal Management Program (currently in draft).</p>
<p>A POM for Broulee Mossy Point is overdue.</p>	<p>No change proposed.</p> <p>POMs for all reserve locations are identified in action EGC3.</p>
<p>Some risks should be higher in the risk assessment and/or should have actions due to high risk.</p> <p>For example, Tomakin Community Association does not feel the CMP objectives are being met in the CMP in relation to Tomakin and Barlings Beaches, and that there should be actions for Tomaga Spit.</p>	<p>No change proposed.</p> <p>The risk assessment is comprehensive and builds upon updated modelling, comprehensive literature review, community engagement and site inspections as part of preparing the draft Open Coast CMP.</p> <p>A range of potential coastal management options were identified for the entire Eurobodalla LGA coastline and were assessed for their feasibility and then viability as discussed in Section 3.1 of the CMP.</p> <p>Action CH1_Z identifies the stormwater outlet at Tomakin Cove is within the coastal erosion risk area. The action intends to ensure the outlet is inspected following coastal storms and opportunities to relocate or modify the outlet are sought, if required. There is an action to monitor the area.</p> <p>The CZEAS provides guidance for beach scraping at Tomakin Cove to support beach recovery following a coastal storm. The CZEAS also provides guidance to prepare for and respond to coastal inundation risk.</p>

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	<p>Action EGC4_H seeks to review, update and implement the POM for Aboriginal Place at Barlings Beach. This recognises the important role Traditional Owners have in managing our coastline.</p> <p>The CMP Options Feasibility Assessment looked at options to manage access along spit at Tomakin Beach to reduce impacts on vegetation and spit stability (Option RA2_C). It was identified that management of the spit would be assessed through a separate management plan for Tomaga River Estuary that could undertake detailed modelling of estuary flows and potential for spit breakout. A management plan will be developed when resources are available and this would include further consultation with the community.</p> <p>A range of other options to manage erosion risk at Tomakin Cove were assessed in the preparation of the CMP but were not supported to proceed to actions for implementation:</p> <ul style="list-style-type: none"> • CH1_S Sand Nourishment at Tomakin Cove following an erosion event (did not proceed past the viability assessment as no reliable and permissible sand source could be identified) • CH1_T Trigger based stabilisation of sand spit to rocky outcrop at Tomakin Cove (Did not proceed past feasibility assessment as it would not moderate the effects of sea level rise induced recession, with limited impact on the predicted 2100 Erosion Hazard Line) • CH1_U Offshore reef at Tomakin Cove (Did not proceed past viability assessment as the existing risk to private property and dune systems is relatively low and does not justify the expense of an offshore reef. The option also does not provide adequate protection against recession caused by sea level rise). <p>Council already has an adopted and current Coastal Zone Management Program (CZMP) for Tomaga Spit, which was adopted in 2015 and has been largely implemented over the last seven years. The draft Open Coast CMP does not propose to replace the current CZMP. A management plan for Tomaga spit and the river will be developed when resources are available and this would involve further consultation with the community.</p>
<p>Why are coastal hazards (erosion, inundation and cliff instability) and the mitigation measures to address them only shown in some locations, and not all beaches and foreshores along the Eurobodalla Shire?</p>	<p>No change proposed.</p> <p>The Stage 2 coastal hazard assessment looked at the exposure of the entire Eurobodalla coastline against the coastal hazard threats relevant to the open coast (ie. inundation, erosion, ICOLL entrance management). The outcomes identified locations where more detailed coastal hazard assessment was required to better define the risk (those in the Stage 2 Report) or coastal risks needed to be</p>

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<p>Why are some beaches not given a higher priority? Why are there more actions in the north of the Shire?</p>	<p>managed in Stage 3. Coastal erosion and inundation (from the coast) or cliff instability were not identified to pose a significant risk to private or public assets for all areas of the Eurobodalla. The first pass risk assessment involved:</p> <ul style="list-style-type: none"> • Separating the coast into 46 coastal compartments • Exposure to coastal hazards for each determined, based on existing studies (WRL, 2017, SMEC, 2010 and ACT Geotechnical Engineers, 2012) or high-level erosion, recession and inundation assessment. • Exposure validated through field inspections in March 2021. <p>The risk assessment is comprehensive and builds upon updated modelling, comprehensive literature review, community engagement and site inspections as part of preparing the draft Open Coast CMP.</p> <p>A range of potential coastal management options were identified for the entire Eurobodalla LGA coastline and were assessed for their feasibility, and then viability as discussed in Section 3.1 of the draft Open Coast CMP.</p> <p>There are a large number of actions north of Broulee as these locations have a high density of urban development at risk from coastal threats and urban development impacts on the coastal area (including habitat impacts).</p> <p>A thorough investigation was undertaken of potential options to address a wide range of coastal threats across the entire study area. There are a number of actions in the CMP that relate to the whole study area and, as such, are not mapped.</p> <p>The following actions south of Broulee have been included in the CMP:</p> <ul style="list-style-type: none"> • RA6_A Monitor usage and impacts of high usage on bike tracks between Broulee Head and Moruya Heads • RA1_A Manage user conflicts at Bingie Dreaming Track • CH1_X Beach nourishment at One Tree Beach • CH4_S Emergency response plan for Beachcomber Holiday Park • CH4_V Access road raising to Beachcomber Holiday Park • CH8_C ICOLL Entrance management at Congo, Potato Point, Lake Brou, Corunna Lake • CH8_B Review and update Estuary Entrance Management Plans for Kianga, Little Lake (Narooma), Nangudga Lake • CH8_B Install signage at Kianga, Little Lake (Narooma), Nangudga Lake to reduce illegal ICOLL openings • EGC4_K Improve access to Country north of Wallaga Lake

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<p>The potential impact of urban development on the open coast eg. erosion and sediment impacts, are not considered. Current planning regulations are inadequate for protecting it from development in the catchment.</p>	<p>No change proposed.</p> <p>A range of threats related to development in the coastal area were identified and options to mitigate them assessed as part of the CMP. These threats included:</p> <ul style="list-style-type: none"> • CD Threat 1 – Coastal development resulting in loss of plant and animal species (habitat disturbance or loss) • CD Threat 2 – Water pollution from urban stormwater and treated effluent discharge • CD Threat 3 – Pollution of water, beach sand and other habitat areas with litter, solid waste, marine debris and microplastics • CD Threat 4 – Coastal development encroaching onto natural coastal processes to exacerbate hazard impacts. <p>A range of actions to address these threats (all with prefix CD) are included in the CMP Business Plan and include mitigation of water quality issues, protection of biodiversity and habitat, and weed management.</p> <p>In addition, a review was undertaken on Council’s sediment and erosion control guidelines (as part of the feasibility assessment of options) and this identified that they align with the NSW Marine Water Quality Objectives.</p>
<p>Concern about the maps:</p> <ul style="list-style-type: none"> • shows entire suburb of Surfside will be underwater in 20 years. • Coastal Vulnerability Area is applied to higher elevations/cliff top areas. 	<p>No change proposed.</p> <p>Modelling was undertaken for a range of coastal storms (also sometimes referred to as East Coast Lows) under existing and future sea levels. In addition, modelling was undertaken for tides under existing and future sea levels. The coastal storm modelling shows inundation of Surfside during a large storm. The area of Surfside impacted, increases into the future as sea levels rise. This inundation would be for several hours, not permanent. Tidal modelling for 2100 sea levels shows very little inundation of Surfside.</p> <p>Cliff top areas like Northcove Road, Long Beach, are identified as having cliff instability risk, not inundation risk. Cliff instability is one of the seven identified coastal hazards required to be mapped where present under the <i>Coastal Management Act 2016</i>.</p>
<p>Concern that the actions in the draft Open Coast CMP and CZEAS will not actually happen.</p>	<p>No change proposed.</p> <p>By adopting and certifying the Open Coast CMP, Council and other responsible agencies commit to implementing the CMP subject to the availability of funding.</p>

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<p>Request that boating access not be reinstated at Long Beach. Prevent vehicle access to Long Beach. Access should only be about access for boats and fishers.</p> <p>There were also some views that there needs to be boat access and to allow 4WD access to Eurobodalla's beaches.</p>	<p>No change proposed.</p> <p>The draft Open Coast CMP does not refer to changing existing boat access for Long Beach. New or upgraded boat ramps would be considered through Council's Marine Asset Management Strategy, noting there are already many options for boat launching across Eurobodalla.</p> <p>Vehicles are prohibited on Long Beach. Decreasing vehicle access can be incorporated into the design of the proposed revetment. Council will investigate short term actions to prevent vehicle access.</p> <p>Allowing 4WD access to beaches could pose a significant impact to shorebird nesting, coastal vegetation, safety of other beach users and destabilisation of sand. It is not considered compatible with the objectives of the <i>Coastal Management Act 2016</i> and has not been included as an action in the draft Open Coast CMP.</p>
<p>Suggestion that bushfire risk is not considered and perhaps should be.</p>	<p>No change proposed.</p> <p>Cultural burns will be undertaken as part of Action EGC4_A to improve natural resilience to coastal threats.</p>
<p>Request that Council install wave return barriers for the Batemans Bay CBD and update stormwater network.</p> <p>Incorporate measures to mitigate the flood risk in Batemans Bay.</p>	<p>No change proposed.</p> <p>There is an identified wave return barrier for the Batemans Bay CBD in the draft Open Coast CMP. Parts of the Batemans Bay stormwater network is currently being updated through a \$1.4M stormwater project, which will facilitate more housing in the area. The stormwater network will continue to be investigated and upgraded as part of future planning and infrastructure projects.</p> <p>Council adopted a Batemans Bay Flood Risk Study in 2021. The next phase of the Flood Risk Management Cycle is a Flood Risk Management Plan. This is proposed to be completed in 2024 pending funding and resources.</p>
<p>Suggestion that action RA2_F is increased in scope given the large number of Landcare volunteers and potential projects.</p> <p>Work with Landcare groups to manage coastal areas.</p>	<p>No change proposed.</p> <p>RA2_F allocates \$20,000 funding per year to support Coastcare/Landcare projects.</p> <p>The unpredictable nature of Landcare grants makes allocating additional Council funding difficult. There is currently only one part-time Council staff member to manage an already large area and number of Landcare groups. Council will continue to seek grant funding for staff and projects and the draft Open Coast CMP supports this.</p>
<p>The CMP is difficult to read and understand eg. it needs easier to understand explanations of "storm surge" verses "flooding" and other terminology used</p>	<p>A new action for the preparation of community fact sheets to explain coastal hazards and actions to address the hazards described in the CMP in a more accessible way.</p>

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Can the CMP support the Tilba UNESCO Biosphere Application?	<p>No change proposed.</p> <p>The CMP does not refer to the UNESCO Biosphere process. However, an adopted Open Coast CMP shows a commitment to implementing actions that protect and manage Eurobodalla's coast which would be consistent with a UNESCO Biosphere application.</p>
<p>Beach access and dune management is required to:</p> <ul style="list-style-type: none"> • Minimise impacts on dunes • Rehabilitate and protect dunes • Improve accessibility to beaches • Ensure existing infrastructure is maintained and replaced when required 	<p>Updated action RA2_B to undertake dune vegetation management and minimise unregulated pedestrian access at Rosedale Beach and Broulee to also include Maloneys Beach.</p> <p>Wording has been added to Section 3 of the draft CMP to better convey to the community accessibility to beaches is being undertaken by Council already and therefore not required in the business plan.</p> <p>During preparation of this CMP Council received a \$495,000 grant to upgrade access at several Council beaches, including:</p> <ul style="list-style-type: none"> - Surf Beach - Malua Bay Beach - South Broulee (Bengello) Beach - Moruya South Head - Tuross Head Main Beach - Dalmeny Beach - Narooma South Bar - Narooma Surf Beach <p>There are a range of other actions in the CMP aimed at protecting dunes and managing access to the coast:</p> <ul style="list-style-type: none"> • CD1_B Dune management at north end of Broulee Beach • CH1_Ka Coastal protection works to include enabling public access and use of the beach at Wharf Road, North Batemans Bay • CH9_B Erosion management of the dune at Knowlman Road, Rosedale • EGC4_J Manage access issues and erosion at targeted sites of significant value to the Aboriginal community • CH9_A Prepare frontal dune management plans at beach reserves at Maloneys Beach, Long Beach, Surfside, Corrigans (include Clyde View Holiday Park) and Malua Bay. • CH4_D includes nourishment and revegetation of the dune at Surfside.
Will review, update and implement PoM for Aboriginal Place at Barlings Beach take another 10 years?	<p>No action proposed.</p> <p>Action EGC4_H allocated \$5,000 in funding per year to ensure the PoM is implemented as intended and for it to be updated if required. This is identified as commencing in Year 1 of the CMP.</p>

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<p>Visitors don't have access to information to build an appreciation of the coast and would benefit from local knowledge when visiting the area.</p>	<p>No Change proposed.</p> <p>Action CHO_B allocates \$100,000 over the 10-year business plan to undertake community events to promote tourism opportunities in the coastal zone.</p> <p>Action EGC4_C allocates \$30,000 per year to support Aboriginal cultural tourism opportunities in the coastal zone to protect Aboriginal heritage.</p>
<p>Clarify how monitoring of cliff movement would take place.</p>	<p>Action CH10_C has been updated to include long term monitoring of shoreline position using NSW Government Lidar data, captured every few years.</p>
<p>Why do the coastal inundation maps “cut off” in some locations?</p>	<p>The coastal inundation maps have been updated to include notation of the model limits.</p> <p>The coastal inundation maps have been generated from hydraulic models. The “cut off” to these extents represent the limit of the hydraulic models. The maps will notate the limit of the flood model on the coastal inundation maps (where relevant - eg. Surfside) to clarify why the mapping doesn't include areas beyond the model limits.</p>
<p>Has the CMP considered local observations and knowledge regarding historical changes to our beaches and foreshores?</p>	<p>No change proposed.</p> <p>A thorough literature review was undertaken in Stages 1 and 2 of the draft Open Coast CMP to understand historical changes to the open coast. Further information was provided by community members throughout development of the draft Open Coast CMP.</p> <p>Community observations and knowledge are important to the ongoing management of the coast, and to evaluate the success of the CMP implementation.</p> <p>Action EGC2_B is to identify opportunities to promote, support and undertake citizen science and research initiatives with the coastal zone. Examples include promotion of Council's existing CoastSnap program; use of drones and citizen scientists to survey and analyse beach change, support research endeavours such as university honours, doctorate and post doctorate investigations within the Eurobodalla coastal zone.</p>
<p>Why are the threats to the coastal zone different in the draft CMP compared to the Scoping Study?</p>	<p>Section 2.2. now clarifies how threats were assessed during Stage 3 of the CMP process.</p> <p>For example, the Scoping Study included a threat associated with water pollution from agricultural diffuse sources. Further assessment of this threat concluded that this was not a relevant threat to the Eurobodalla Open Coast.</p>

Responses to submissions about the draft Open Coast Coastal Management program

Issue raised	Proposed changes to draft Open Coast CMP
Aboriginal Connection to the Coast is not obvious in the CMP	An acknowledgement of the Aboriginal community's connection to the coast has been added to the inside cover of the CMP to acknowledge the long and continuous connection and the important role Traditional Owners, Knowledge Holders and Elders play in management of the Eurobodalla coast.
A large-scale coastal vulnerability area map for Broulee missing	<p>A large-scale coastal vulnerability area map was inadvertently not included in the draft Open Coast CMP. It has been included in the revised draft.</p> <p>The smaller scale coastal vulnerability area map clearly identifies Broulee. It is also clearly identified in the coastal hazards' maps, also placed on public exhibition. Everyone in the proposed coastal vulnerability area, including in Broulee, was advised via mail about the draft Open Coast CMP being on display and that their property is at risk of coastal hazards.</p>
Why is Council selling land or approving developments in areas identified at risk of coastal hazards?	<p>No change proposed.</p> <p>Coastal inundation risk represents a risk that needs to be considered as part of any development on land affected by that risk (eg. inundation from a large coastal storm). This is done by applying the development controls currently set out in the Interim Coastal Hazard Code and to be updated as an outcome of the CMP using the draft Coastal Hazard Code in Appendix G of the CMP. Development and property sales are not precluded within these risk areas.</p> <p>As with any other parcel within the draft coastal vulnerability area, coastal hazard or flood affectation will be noted on a s10.7 planning certificate for these properties.</p>

Responses to submissions about the draft Open Coast Coastal Management program

Issue raised	Proposed changes to draft Open Coast CMP
<p>Concerns the flood modelling and projected sea level rise is incorrect. For example:</p> <ul style="list-style-type: none"> • Batemans Bay Primary School is not shown as at risk in proposed mapping • The coincident flood levels in the adopted Tomakin, Broulee, Mossy Point flood study and the draft Open Coast CMP do not align. • More information is requested on the sensitivity testing, verification and confidence level in the coastal modelling • Why was the unreliable local gauge used instead of a reliable tide gauge such as Fort Denison. 	<p>Update to the Stage 2 report to provide details on model reliability, calibration and validation.</p> <p>Batemans Bay Primary School is on a higher ground level than the areas shown as inundated.</p> <p>The flood mapping presented in the Tomakin, Broulee, Mossy Point Flood Study differ from coastal inundation mapping in the CMP as they map different hazards. This is due to different conditions assessed eg. ocean level boundary conditions have been updated and refined in the CMP and the CMP does not include catchment rainfall coincidence and updated guidelines (e.g. rainfall guidelines have been updated since the completion of the flood study).</p> <p>The sea level rise projection (SLR) to inform the coastal vulnerability area map was adopted by Council in 2014 following comprehensive scientific investigations and community consultation.</p> <p>Council’s sea level rise policy is based on the outcomes of Assessment Review 5 (AR5) of the International Panel on Climate Change (the IPCC). The IPCC is the largest and most widely peer-reviewed scientific body on climate change science in the world. Further information on the science, methodology and community consultation informing the ‘South Coastal Regional Sea Level Rise Planning and Policy Framework’ can be found on Councils website at: https://www.esc.nsw.gov.au/environment/coast-and-waterways/sea-level-rise.</p>
<p>The draft Coastal Hazards Code states development will be assessed against beach erosion and shoreline recession. Then goes on to say that the code does not apply to areas of foreshore erosion associated with tides and waves and catchment flooding. Isn’t this the same thing?</p>	<p>No change proposed.</p> <p>The draft Coastal Hazards Code applies to the area within the Coastal Vulnerability Area (CVA). The CVA mapping is for coastal hazards on the open coast only. It does not include erosion and inundation of lake or watercourse foreshores caused by tidal waters and the action of waves, including the interaction of those waters with catchment floodwaters. These hazards would be addressed in future estuary CMPs subject to funding and priorities.</p> <p>This is discussed further in Section 8.2.1 f the CMP.</p>

Responses to submissions about the draft Open Coast Coastal Management program

Issue raised	Proposed changes to draft Open Coast CMP
<p>The draft Code requires plans that meet the 'coastal adaptation criteria'. These are not specified in the draft Code, nor are referenced anywhere in the draft Code. If they exist, a reference or summary would assist developers and consultants.</p>	<p>Remove the term 'coastal adaptation criteria' from the draft Code because it is not applicable since removing reference to 'planned retreat'.</p> <p>Community engagement prior to and during the preparation of the draft Open Coast CMP identified 'planned retreat' was not supported in the adopted Interim Coastal Hazard Adaptation Code. As such, it was removed as a management option for coastal development, along with associated references to adaptation/retreat.</p> <p>Reference to the coastal adaptation criteria was inadvertently left in the draft Code and should have been removed with other references related to adaptation.</p>
<p>What is the justification for limiting variations in gross floor area (GFA) to 30m² in 10.viii of the draft Code? Could this be increased to 60m² or more?</p>	<p>No change proposed.</p> <p>This only applies to development within the erosion risk area. Development in the coastal inundation risk area does not have GFA restrictions.</p> <p>The intent of the code is to avoid and minimise the risk of coastal hazards on development. Avoiding development in these areas is preferred but the 30m² gross floor area (GFA) allows for minor addition to existing development. The code seeks to provide some flexibility for a minor addition such as a single room. 30m² is considered an appropriate GFA providing some flexibility to the property owner for development in locations that would be impacted by coastal erosion in the future. An increase in GFA of 60m² would represent a significant addition to an existing dwelling, many of which are less than 250m².</p>
<p>Clause 11.2(c) is referenced in the draft Code but it doesn't exist in the document.</p>	<p>This has been corrected in the draft code to read 'Clause 11'.</p>
<p>The draft Open Coast CMP does not consider relocation or adaptation of existing housing at risk of coastal hazards.</p>	<p>No change proposed.</p> <p>Community engagement prior to and during the preparation of the draft Open Coast CMP identified that adaptation, relocation or 'planned retreat' was not supported in the adopted Interim Coastal Hazards Adaptation Code. As such, it was removed as an option for managing the risk of coastal hazards on coastal development.</p>
<p>There should be more collaboration with National Parks and Batemans Marine Park who are managing most of the Eurobodalla coast.</p> <p>There should be a high level of cooperation among Government organisations.</p>	<p>No change proposed.</p> <p>NSW NPWS is identified as the lead agency on four actions and is the support agency on fourteen actions. DPI-Fisheries is identified as the lead agency on one action and the support agency on twenty three actions.</p> <p>There has been extensive interagency collaboration. This includes letters of support from other responsible agencies and regular meetings of the NSW Government Taskforce that had representatives from all relevant NSW agencies.</p>

Responses to submissions about the draft Open Coast Coastal Management program

Issue raised	Proposed changes to draft Open Coast CMP
<p>Only a few actions include Aboriginal expertise and involvement. Coastal management is an ideal opportunity to engage traditional owners for their knowledge and help with management.</p>	<p>No change proposed.</p> <p>Traditional Owners have been identified as a key stakeholder to have direct input on the following actions:</p> <ul style="list-style-type: none"> • EGC4_A Identify opportunities for and undertake cultural burning in the coastal zone • EGC4_C Support Aboriginal cultural tourism opportunities in the coastal zone to protect Aboriginal heritage • EGC4_D Embed traditional Aboriginal knowledge, wisdom and culture in strategic planning by providing knowledge consulting fees to knowledge holders involved in coastal management to protect Aboriginal heritage in the coastal zone • EGC4_E Support local Aboriginal communities manage cultural heritage from coastal hazards and sea level rise and other coastal threats • EGC4_F Improve access to Country in the coastal zone through the establishment of an Access to Country Plan • EGC4_G Identify and use Aboriginal place names in the coastal zone • EGC4_H Review, update and implement PoM for Aboriginal Place at Barlings Beach • EGC4_I Prepare an Aboriginal Seasonal Calendar • EGC4_B Support DPI Fisheries with the implementation of Objective 4) To Partner with Aboriginal people for the protection of Aboriginal cultural values and improved marine park management of the NSW Mainland Marine Park Network Management Plan 2022 – 2033 • EGC4_J Manage access issues and erosion at targeted sites of significant value to the Aboriginal Community as identified by the LALCs • RA1_A Manage user conflicts at Bingie Dreaming Track and Shark Bay/Broulee Island track • CD2_A Investigate source of water quality issues at Surf Beach • RA6_A Engagement and management of impacts of bike track usage between Broulee Head and Moruya Heads
<p>The extensive use of acronyms makes it very difficult for the general public to understand the tables. All tables should be self-explanatory with acronyms defined under the table or in a separate table. If they have been we did not find it.</p>	<p>No change proposed.</p> <p>Acronyms and abbreviations are provided in Section 10.</p>

Responses to submissions about the draft Open Coast Coastal Management program

Issue raised	Proposed changes to draft Open Coast CMP
<p>It is unhelpful and inappropriate to combine commercial and recreational fishing into a single threat category since they have very different impacts.</p> <p>It should be in table 2.2.</p>	<p>No change proposed.</p> <p>Engagement with DPI-Fisheries and Batemans Marine Park did not identify commercial or recreational fishing to be an existing high-risk threat. With increased population and tourism, the risk assessment identified that this could increase to a high risk in the future. Considering the medium level of risk associated with both activities, it is considered appropriate to combine them into a single threat for the purpose of the CMP.</p> <p>Table 2.2 identified 'key' coastal management threats only. The full list of threats is provided in Figure 2.1.</p>
<p>Does the future risk rating assume no action or optimal management?</p> <p>Some risk ratings are already out of date e.g. CH Threats 1, 2 and 8 relating to erosion of foreshore beaches and dunes. This is already quite severe in many areas (e.g. Tomakin, Broulee, Moruya beaches).</p>	<p>No change proposed.</p> <p>The risk assessment assumes 'business as usual', ie. any existing mitigation methods will continue to be implemented.</p> <p>The risk rating combines the likelihood of the threat along with the consequence of the threat occurring. The presence of erosion alone would represent a high likelihood of erosion. The consequence is determined based on what is put at risk by the erosion. Dunes have a natural ability to recover following coastal erosion events. However, if the erosion threatens a public asset, eg. a road, this could be significantly damaged and have associated impacts on its users.</p>
<p>Although water quality and contamination has been identified as a serious threat in many documents, the consultants have not specified any locations for actions eg. Broulee.</p>	<p>No change proposed.</p> <p>The following actions are included to address specific issues identified:</p> <ul style="list-style-type: none"> • CD2_A Water quality issues have been identified by the community (through the community working groups) and by Mogo LALC. It was suspected that the issues were a result of landfill leachate/runoff, stormwater or sewer overflow. Examination of the issue is to be continued by Council at Surf Beach. This will include engaging an expert to investigate the issue. • CD3_B The Beachwatch Program, in partnership with DPE, is undertaken every year from the start of November to the end of March, with five samples collected each month from 11 popular beaches. This program is to be continued by Council in partnership with DPE. <p>Broulee is included in the Beachwatch Program.</p>

Responses to submissions about the draft Open Coast Coastal Management program

Issue raised	Proposed changes to draft Open Coast CMP
<p>Invert level of culverts at Maloneys Creek under Northcove Road too high and creates stagnant water, would like to see a bridge.</p>	<p>No change proposed.</p> <p>Maloneys Creek is an estuary that under natural conditions (i.e. without a culvert and a road at the entrance) closes and opens to the ocean with the gradual build-up of sand at its entrance between large flows events that scour the sand out of the entrance.</p> <p>This process occurs even with the presence of a culvert, as can be seen with the build-up of sand in the culvert. This same process would occur with a bridge replacing the culvert.</p>
<p>The CMP should help the Council to protect beach infrastructure, including carparks, pathways, and community facilities.</p>	<p>No change proposed.</p> <p>The draft Open Coast CMP will help Council avoid and minimise the impacts of coastal hazards on public infrastructure.</p> <p>The draft Open Coast CMP provides a review of private and public assets and infrastructure at risk from coastal hazards at current and future sea levels.</p> <p>The Business Plan sets out a program for actions to ensure the works and planning to protect these assets and infrastructure are in place.</p>
<p>Individuals need to be informed about options for protecting their properties from coastal hazards, including associated costs and benefits.</p>	<p>No change proposed.</p> <p>The CMP does not recommend actions that are primarily to protect private properties from coastal erosion.</p> <p>Existing coastal erosion only threatens a few private properties at Sunshine Bay, Broulee and Long Beach. The Coastal Zone Emergency Action Subplan (CZEAS) provides guidance to private landowners in these locations as to how they can protect their properties against coastal erosion.</p>
<p>The CMP does not embrace community education and engagement, and cultural inclusion, as valuable tools to achieve CMP goals.</p> <p>We would welcome a move away from the outdated model of increased policing, barriers and negative signage as enforcement strategies, in favour of information and education of communities on the importance of valuing, respecting and caring for the environment.</p>	<p>No change proposed.</p> <p>EGC Threat 2 identified the lack of engagement with managing the coastal environment as a high risk, which will increase to an extreme risk in the future if not addressed.</p> <p>In addition to the extensive engagement undertaken to prepare the draft Open Coast CMP, it includes the following actions to promote the coastal zone:</p> <ul style="list-style-type: none"> • Action EGC2_B Identify opportunities to promote, support and undertake citizen science and research initiatives with the coastal zone • Action EGC4_C Support Aboriginal cultural tourism opportunities in the coastal zone to protect Aboriginal heritage • Action CHO_B Undertake a Council coast event/festival to promote tourism opportunities, specifically linked to coastal values. This may integrate with existing festivals such as Narooma Oyster Festival, River of Art and Bay Paddle Challenge.

Responses to submissions about the draft Open Coast Coastal Management program

Issue raised	Proposed changes to draft Open Coast CMP
Is the heavy erosion of the banks of Durras Lake included in your study?	No change proposed. The draft Open Coast CMP does not include estuaries, such as Durras Lake. A future Estuary CMP would be developed for this area pending resources and priorities.
Include an action to develop and implement a monitoring program for erosion occurring at the base of the Northcove Road, Long Beach, cliff and further occasional monitoring for any other significant signs of instability.	Action CH10_C has been updated to include long term monitoring of shoreline position using NSW Government Lidar data captured every few years.
Clarify within the body of the main report that there are two Northcove Road, Long Beach items: <ul style="list-style-type: none"> • Identification of Northcove Road, Long Beach as a Coastal Vulnerability Area. • Cost Benefit Analysis for major works in Maloneys Beach at the small end section of Northcove Road starting at the culvert and ending at the Maloneys Drive intersection. 	No change proposed. The draft CVA map covers many locations at risk of coastal hazards. There is no specific action relating the Northcove Road CVA mapping. The draft CMP correctly refers to one action referring to Northcove Drive.
Please change the coastal vulnerability area colour to something other than blue to avoid confusion with water.	The colour of the coastal vulnerability area will be changed to avoid confusion eg. purple.
The Coastal Zone Emergency Action Subplan (CZEAS) is missing Coastal Cliff Instability Maps referred to in Appendix A of the CZEAS.	Coastal Cliff Instability Maps added to Appendix A of the CZEAS.
Broulee property acquisition is shown on the CMP Actions Maps, but it not an action in the business plan.	Remove property acquisition on the Action Map. Broulee property acquisition was assessed as a potential option in the CMP (Option CH1_V). However, this option was not recommended for inclusion in the CMP as there is no existing erosion risk to the subject properties and future erosion risk can be managed through implementation of development controls.

Responses to submissions about the draft Open Coast Coastal Management program

Issue raised	Proposed changes to draft Open Coast CMP
<p>Parking at McKenzies Beach overflows in peak period creating a safety issue and impacting the area.</p> <p>Improvements to parking should look to protect vegetation and could consider a shuttle bus or other strategy to reduce cars.</p>	<p>Update Action RA3_J to include consideration of parking and transport improvements that also avoid and minimise impacts on vegetation.</p> <p>Action RA3_J already refers to an investigation to improve access at McKenzies Beach, to address the illegal parking and crowding along the road edge.</p>
<p>Toilets at Guerilla Bay</p>	<p>No change proposed.</p> <p>Poorly located, poorly maintained and/or inappropriate access and supporting facilities was considered a medium risk currently and in the future.</p> <p>There are actions related to facilities and access, however throughout the draft Open Coast CMP process, toilets at Guerilla Bay therefore were not identified as a priority for action for within the 10-year timeframe for delivery of this CMP.</p>
<p>Council needs to enforce the conservation and environmental protection zoning set down for McKenzie Beach and adjoining land and undertake compliance action or illegal works eg. tree removal</p>	<p>No change proposed.</p> <p>Council already undertakes compliance action where we are the responsible authority, for illegal works or impacts to the environment.</p>
<p>Changes to the NSW planning system</p>	<p>No change proposed.</p> <p>It is outside the scope of a coastal management program to advocate for changes to the NSW planning system.</p>