

Comments and Advice received from Public Agencies on the CZMP for the Brunswick Estuary

Ref #	CZMP Ref	Agency	Comment	Suggested Changes	BSC Response (Document changes in bold)
1.	General Comment	DPI Fisheries	DPI Fisheries acknowledges Byron Shire Council's efforts in preparing the plan and undertaking consultation. DPI Fisheries cannot, however, endorse the plan in its current form and requests changes be made.	Changes as outlined in Comments #2 – #7.	Noted.
2.	General Comment	DPI Fisheries	The terminology used in the BECZMP referring to 'DPI Marine Parks' and 'Department of Primary Industries - Marine Parks' needs to be amended to simply refer to 'DPI Fisheries'.	Amend to DPI Fisheries	Minor edit.
	General Comment	DPI Fisheries	DPI Fisheries highlights that a threat and risk assessment for the NSW marine estate is presently being finalised. CZMPs should be strategically aligned to these key threats and the DPI endorses actions that seek to address these threats as matters of priority for funding.	Strategically align plan with the key threats outlined in the Marine Estate Threat and Risk Assessment.	Noted. The key issues were identified through a comprehensive consultation program. The CZMP has now been reviewed and updated and it is considered that the same key issues are still relevant as to when the plan was developed. Consideration of further key issues and strategic alignment with the Marine Estate Threat and Risk Assessment may be addressed if/when the CZMP may be transitioned to a CMP under the new Act in 2021.
	Management Action R1	DPI Fisheries	DPI Fisheries should not be identified as a lead or contributing agency to Item R1. This item is beyond the scope of DPI Fisheries activities.	Remove DPI Fisheries from R1.	Minor edit.

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	Management Actions R2 & R4	DPI Fisheries	DPI Fisheries should not be listed for actions where the Department's role will occur as part of its day to day regulatory role (ie R2 and R4), or, where DPI Fisheries will have only a minor role. DPI Fisheries does not support inclusion of these items in the BECZMP. Further, the current wording of R2 and R4 appears to extend beyond DPI Fisheries specific regulator role. For example the description in the subtask for item R4 states: <i>'BSC and DPI Fisheries to investigate illegal landowner development (built structures) and riparian vegetation clearing along all reaches of the Brunswick Estuary'</i> . DPI Fisheries regulates harm to marine vegetation (kelp, seagrass, mangroves and saltmarsh) on public land. DPI Fisheries regulatory role does not encompass other riparian vegetation types within the Brunswick estuary. DPI Fisheries has a strong compliance function that works to ensure adherence to provisions within the <i>Fisheries Management Act 1994</i> and the <i>Marine Estate Management Act 2014</i> within the Brunswick Estuary.	Remove actions R2 and R4 relating to illegal rock armouring and encroachment of built structures.	Not supportive of removal of actions. Modify Management Actions (R2 and R4) to not include DPI Fisheries as a Responsible Agency. DoI Crown Land & Water is supportive of this action (refer Comment # 18).
	Management Actions R2 & R4	DPI Fisheries	DPI Fisheries would support an action that recognised the cumulative impact of foreshore bank armouring and foreshore structures and proposed an estuary wide strategic assessment of the most suitable sites for these works.	New action required? Confirm the wording with DPI Fisheries.	Further consultation with DPI Fisheries required to develop a new action. Consultation to occur at a later date when staff resources may permit.

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	Management Actions IR1 & IR8	DPI Fisheries	DPI Fisheries agrees that the following Items IR1 and IR8 are desirable actions. <i>'IR1 Determine current status of recreational and commercial activities and their impact on estuary health and user values and develop a guidance document for the sustainable management of commercial activities'</i> and <i>'IR8 Assessing the distribution and abundance off fish stocks in the Brunswick Estuary.'</i> However, participation by DPI Fisheries in the implementation of these actions is reliant upon the Department having sufficient resources or receiving specific funding to support the subject actions. This needs to be reflected in the wording of these actions.	Reword to reflect that implementation of this action is reliant upon the Department having resources and funds available. New wording added to Lead Agency column – <i>"DPI Fisheries (pending funding or resources available)"</i> .	Modify Management Actions (IR1 & IR8) with suggested wording.
	General Comment	Dol Crown Lands and Water	In its current form, the Department is not in a position to agree to the relevant actions in the CZMP that affect Crown land or assets, which is a requirement under section 55C(2)(b) of the <i>Coastal Protection Act 1979</i> . Further consultation and amendments will need to occur prior to the Department being in a position to agree to the CZMP.	Changes as outlined in Comments #8 – #26.	Noted.
	General Comment Naming Conventions	Dol Crown Lands and Water	The Department's name has changed to: <i>"NSW Department of Industry – Crown Lands & Water"</i>	Update naming convention throughout document: <i>"NSW Department of Industry – Crown Lands & Water"</i> and thereafter <i>"Dol Crown Lands & Water"</i>	Minor edit
	General Comment Aboriginal Land Rights Act 1983 and Native Title 1993.	Dol Crown Lands and Water	It is unclear if the CZMP has considered <i>Aboriginal Land Rights Act 1983 (NSW)</i> or <i>Native Title Act 1993</i> considerations / obligations. For example, actions may affect parcels of land	As a minimum, suggested text to be included in an appropriate section of the CZMP and / or to accompany the Implementation Schedule:	Add new sub-section to section 4.4 outlining that authorisations from agencies may be required for any proposed works their land.

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			<p>which are subject to a claim(s) under the <i>Aboriginal Land Rights Act 1983</i>.</p> <p>For indicative purposes, where claim(s) under the <i>Aboriginal Land Rights Act 1983</i> have been lodged on parcels affected by the implementation actions, they have been noted in the specific comments. Noting however that the status may change for each parcel, and will need to be confirmed through the Aboriginal Land Rights Register at the appropriate time as part of the planning and approvals process: http://www.oralra.nsw.gov.au/landclaimsregister.html.</p>	<p><i>Where actions are proposed on Crown land, consideration of Aboriginal Land Claims lodged under the NSW Aboriginal Land Rights Act 1983 will need to occur. In addition, any works will need to be compliant with the Commonwealth Native Title Act 1993.</i></p>	
	General Comment Crown land authorisations	DoI Crown Lands and Water	<p>The Table at Appendix C notes that the <i>Crown Lands Act 1989</i> is relevant to the CZMP however it is unclear from the introductory text as to whether the role of the <i>Crown Lands Act 1989</i> is understood in relation to coastal zone management and the implementation of actions.</p> <p>Where works are proposed on Crown land, not under Council Trust management, an appropriate authorisation from DoI Crown Lands & Water will be required prior to the works commencing.</p> <p>Authorisation may be provided by way of licence or potentially the appointment of Council as the reserve manager to streamline future management arrangements. This issue may be relevant to a number of actions in the CZMP, refer specific comments.</p> <p>Note that adequate lead time (at least six months) is required for the Department to assess and issue authorisation (licence) works on Crown land.</p> <p>For indicative purposes, where authorisations are</p>	<p>The CZMP could include a section which provides more information on the role of the <i>Crown Lands Act 1989</i> in the coastal zone and the need for appropriate authorisations under this Act prior to implementing certain actions in the CZMP. In addition or alternatively, the CZMP could acknowledge the need for authorisations under the <i>Crown Lands Act 1989</i> against each relevant action.</p>	<p>Add new sub-section to section 4.4 outlining that authorisations from agencies may be required for any proposed works their land.</p>

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			<p>likely to be required from the Department, this has been noted against specific implementation actions.</p> <p>Note the <i>Crown Land Management Act 2016</i> is expected to commence in early 2018. This may have implications that will need to be considered when the CZMP actions are implemented.</p>		
	General Comment and Land Ownership	Dol Crown Lands and Water	<p>At section 2.5.1 the CZMP acknowledges that the Department has a role to play in implementing the CZMP but lacks more detailed information on public land ownership and management arrangements in the coastal zone (also refer above comment).</p> <p>This information would assist with the implementation of the CZMP as it underpins the management actions and enables the identification of the appropriate organisation / agency etc responsible for implementation of actions.</p> <p>At section 2.5.3 the 'Brunswick Heads Foreshore Reserves Strategic Plan 2008' and 'Brunswick Heads Foreshore Reserves Plan of Management 2014' are acknowledged in the document. It may be useful to also include the following plans:</p> <ul style="list-style-type: none"> • Ferry Reserve Holiday Park – Plan of Management 2014 (GF81R265, DOC14/065107) • Massy Greene Holiday Park - Plan of Management 2014 (09/19253, DOC14/065103) • Terrace Reserve Holiday Park - Plan of Management 2014 (10/05985, DOC14/065099). 	<p>Include relevant agencies and plans of management in section 2.5.</p> <p>Liaise with NSW Crown Holiday Parks Trust to ensure that the list of relevant PoMs is current in relation to the holiday parks.</p>	<p>Add sentence to Section 2.5.1 on the role of Cape Byron Marine Park and Zoning Plan. Add the 3 PoMs for the Holiday Parks.</p> <p>Comments received from NSWCHPT did not request any changes to list of PoMs.</p>

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			<p>Note that these Holiday Park PoMs are currently under review.</p> <p>Identification of relevant Plans of Management for public lands is recommended to promote a consistent, integrated and 'whole of government' approach to coastal zone management. (Coastal Management Principle 2).</p> <p>The role of the Cape Byron Marine Park should also be better acknowledged in this section as it is an important statutory planning and management authority for the estuary.</p>		
	General Comment	DoI Crown Lands and Water	The implementation of actions by the Department will be dependent on government priorities and the availability of staff and other resources.	Comment only.	<p>Add additional wording to Section 4, page 21 "All strategies are pending available funding and resources...".</p> <p>This is also in accordance with Comment #7 (DPI Fisheries).</p>
	General Comment	DoI Crown Lands and Water	<p>The Brunswick river entrance breakwalls and harbour are a key feature of the study area. The breakwalls and harbour are owned and maintained by DoI Crown Lands & Water.</p> <p>The main body of the CZMP, including section 3 'Management Area' is silent on the river entrance breakwalls and harbour. In addition the implementation schedule is silent regarding any future activities that may be associated with the breakwalls and harbour, for example monitoring and maintenance of the break walls, and the development of the Brunswick Heads Boat Harbour Master Plan.</p>	Comment only.	<p>Noted.</p> <p><i>"Upgrade of the Brunswick Heads Boat Ramp parking facilities"</i> was an action in the previous CZMP (G5). As the development of the Brunswick Heads Boat Harbour Master Plan project has already commenced, the outcome of the Audit resulted in the action (G5) being deleted (Refer Appendix B).</p> <p>No additional information has been added to the document on the breakwalls.</p>

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	General Comment Brunswick River dredging	DoI Crown Lands and Water	In 2015, maintenance dredging of the Brunswick River and harbour was undertaken by the DoI Crown Lands & Water. This was for the purpose of maintaining a safe navigation channel leading to the boat harbour and boat ramp. Earlier dredging activities were carried out in the 1970s and 1994. The CZMP is silent on the need for any future maintenance dredging activities.	Comment only.	Noted. Dredging of the river has not been considered in depth in the CZMP and any action proposed such as maintenance of navigation passages is deemed to be outside the scope of this review and update.
	General Comment On-ground works at Site BR12	DoI Crown Lands and Water	There is no reference to the on-ground works at site BR12 (refer Figure 4-2) in the implementation table. If construction works are to occur at this site it is likely to occur on Crown land (including Crown land above the MHW M).	Clarify status of site BR12 in implementation table. Noting actions on nearby Crown Land may require authorisation from DoI – Crown Lands & Water prior to the commencement of construction works.	Update Figure 4.2 – remove site BR12. Management strategy assigned to site is regulatory action only (R2).

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	P3 – <i>“Incorporate and remaining vacant foreshore Crown Land into a formal public land management regime and prepare PoMs.....”</i>	Dol Crown Lands and Water	<p>There is no ‘vacant’ Crown land in the Byron LGA.</p> <p>The Byron Coast Regional Crown Reserve (R1012196), notified 1 September 2006 and the development of the ‘Brunswick Heads Foreshore Reserves Strategic Plan 2008’ were undertaken with the objective of integrating coastal Crown land management. These two activities largely supersede the intent of this action.</p> <p>Section 4.1.2 notes:</p> <p><i>‘It is also proposed that surplus funds generated from the Caravan Parks throughout the estuary be expended within the Crown Reserves and adjacent estuary.’</i></p> <p>The holiday parks contribute a levy to the Public Reserves Management Fund. Funds are available for public reserves, subject to a competitive grant application process. It is not the role of a CZMP to direct the levy system or pre-empt the outcome of grant application process for the PRMF.</p>	<p>The objective to integrate and streamline the management of coastal Crown land is supported. However the action requires updating.</p> <p>Suggest re-word:</p> <p><i>Investigate options for further integration of coastal Crown land management within the Brunswick estuary foreshore reserves system.</i></p> <p>Sub actions may also need revising in line with action.</p> <p>Delete the sentence:</p> <p><i>‘It is also proposed that surplus funds generated from the Caravan Parks throughout the estuary be expended within the Crown Reserves and adjacent estuary.’</i></p>	Minor edit.
	R2 - <i>“Investigate and enforce potential illegal rock armouring in all reaches of the Brunswick Estuary”</i>	Dol Crown Lands and Water	<p>A collaborative approach towards investigating and enforcing compliance matters is supported.</p> <p>Illegal rock armouring is also a compliance issue for Dol Crown Lands & Water where construction works take place on and/or directly/indirectly impact upon Crown land.</p>	<p>Recommend re-word:</p> <p><i>“Investigate potential illegal rock armouring in all reaches of the Brunswick Estuary, and enforce compliance as appropriate.</i></p> <p>Include Dol Crown Lands & Water as a support agency.</p>	<p>Amended wording in R2 to establish a collaborative approach to manage compliance of rock armouring.</p> <p>(Removed DPI Fisheries as a Responsible Agency as per Comment #5).</p>

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	R3 <i>“Investigate and enforce illegal camping at areas adjacent the Brunswick Estuary</i>	Dol Crown Lands and Water	<p>A collaborative approach towards investigating and enforcing compliance matters is supported and this action is agreed to in principle.</p> <p>Council and Dol Crown Lands & Water should explore options to enhance regulatory compliance role within Byron coastal/estuary reserve system.</p>	Comment only.	Add an extra sub-action - “Explore options to enhance regulatory compliance role within Byron coastal/estuary reserve system”.
	R4 <i>“Investigate and enforce encroachment of built structures and clearing of riparian vegetation at areas adjacent the Brunswick Estuary</i>	Dol Crown Lands and Water	<p>A collaborative approach towards investigating and enforcing compliance matters is supported.</p> <p>Council and Dol Crown Lands & Water should explore options to enhance regulatory compliance role within Byron coastal/estuary reserve system.</p> <p>Where construction works have occurred on Crown land, then Dol Crown Lands & Water will be the lead agency in effecting compliance where there is no appointed Trust manager.</p>	<p>(1) Recommend re-word: <i>“Investigate encroachment of built structures and clearing of riparian vegetation at areas adjacent the Brunswick Estuary, and enforce compliance as appropriate.</i></p> <p>(2) Include Dol Crown Lands & Water as a support agency.</p>	<p>(1) Add sub action “Explore options to enhance regulatory compliance role within Byron coastal/estuary reserve system” and “Where construction works have occurred on Crown land, then Dol Crown Lands & Water will be the lead agency in effecting compliance where there is no appointed Trust manager”.</p> <p>(2) Include Support Agency column</p>

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	<i>B1 "Undertake on-ground works (revegetation) at bank erosion sites SI03 and SI04, Simpsons Creek and BR17, Brunswick River"</i>	Dol Crown Lands and Water	<p>Dol Crown Lands & Water are only responsible for works that occur on Crown land where there are no appointed Trust managers (including below the MHWL).</p> <p>There are different land ownership/management statuses between sites SI03, SI04 and BR17, as follows:</p> <ul style="list-style-type: none"> Sites SI03 and SI04 are located on private property (above the MHWL; except for a small corridor that passes through site SI03 which is Crown land managed by Dol Crown Lands & Water). <p>Site BR17 is located on Crown Reserve. As on-ground works at BR17 occur on Crown land (managed by Dol Crown Lands & Water), not under Council Trust management, an appropriate authorisation from Dol Crown Lands & Water will be required prior to the works commencing. Authorisation may be provided by way of licence or potentially the appointment of Council as the Trust Manager for the Reserve.</p> <p>Lead agency column implies Council and Dol Crown Lands & Water have an equivalent role in the implementation of revegetation works. Council have the overarching responsibility to implement this action with support / authorisations from Dol</p>	<p>Remove Dol Crown Lands & Water as lead agency.</p> <p>Another column that acknowledges and identifies 'Supporting' agencies would assist with implementation; identifying Dol Crown Lands & Water where authorisations are required from the department.</p>	<p>Further discussion required with Crown Lands & Water as action does not fully explain the intention that Crown Lands & Water is be the lead agency for works at BR17 (Crown Reserve).</p> <p>Modify this action into 2 sub-actions. Sub-action (1) – Sites SI03 and SI04 with BSC as lead agency. Sub-action (2) – Site BR17 with Crown Lands & Water as lead agency.</p>

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	<i>B2 "Undertake on-ground works (structural bank stabilisation and revegetation) along Simpsons Creek at bank erosion sites S105 and S106"</i>	Dol Crown Lands and Water	<p>Site S106 is located on land under the care control and management of the NSW Crown Holiday Parks Trust and the Brunswick Heads Reserve Trust, the latter of which is managed by Council (as the appointed trust manager).</p> <p>Therefore, NSW Crown Holiday Parks Trust would be responsible for the implementation of bank stabilisation and revegetation works above the MHW. Below the MHW, Dol Crown Lands & Water are responsible for authorising bank stabilisation and revegetation works.</p> <p>Site may be located on private property (Lot 314, DP 755692), the Brunswick Heads Reserve Trust. The land could be subject to Aboriginal Land Claim (ALC 7967).</p>	<p>(1) Remove Dol Crown Lands & Water as lead agency.</p> <p>(2) Another column that acknowledges and identifies 'Supporting' agencies would assist with implementation; identifying Dol Crown Lands & Water where authorisations are required from the department.</p> <p>(3) Further discussions required with NSW Crown Holiday Park Trust as they are more likely to be the lead agency.</p>	<p>(1) Minor edit.</p> <p>(2) Add Support Agency column</p> <p>(3) Further discussions required with NSW Crown Holiday Park Trust as they are more likely to be the lead agency. Modify wording in action - further consultation and discussion needs to be completed to confirm lead agency.</p>

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	B3 <i>“Repair bank stabilisation works along Simpsons Creek at bank erosion sites S108 and S109</i>	Dol Crown Lands and Water	<p>Above the MHW M, land relating to this action is managed by the NSW Crown Holiday Park Trust.</p> <p>Therefore, NSW Crown Holiday Parks Trust would be responsible for the care, control and management of the north-western side of Reserve 82780 on Lot 423.</p> <p>NSW Crown Holiday Parks Trust is responsible for the care, control and management of Reserve 82999, relevant to site S108 and S109. Therefore, NSW Crown Holiday Park Trust need to be consulted and agree to this action.</p> <p>The land at S109 could be subject to Aboriginal Land Claim (ALC 25090).</p>	<p>(1) Remove Dol Crown Lands & Water as lead agency.</p> <p>(2) Consider modifying Figure 4.4 to include all Simpsons Creek sample sites (i.e. include portrait map) for easy identification of separate project areas and sample sites.</p> <p>(3) Further discussions required with NSW Crown Holiday Park Trust as they are more likely to be the lead agency, with Land Owner’s consent from Dol Crown Lands & Water if/where works are contained on Crown land, not under Council Trust management.</p>	<p>(1) Minor edit.</p> <p>(2) Noted.</p> <p>(3) Further discussions required with NSW Crown Holiday Park Trust as they are more likely to be the lead agency. Modify wording in action - further consultation and discussion needs to be completed to confirm lead agency.</p>

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	<i>B11 "Undertake on-ground works (structural bank stabilisation / formalise public access / revegetation) along Simpsons Creek at bank erosion site SI07.</i>	Dol Crown Lands and Water	<p>Reserve 90908 is under the care, control and management of the Brunswick Heads Boy Scouts Reserve Trust (managed by The Scout Association of Australia, NSW Branch) and is responsible for the implementation of actions above the MHWM.</p> <p>Dol Crown Lands & Water are responsible for authorising works that occur below the MHWM where there are no appointed Trust managers.</p> <p>The land is subject to Aboriginal Land Claim (ALC 2332).</p>	<p>(1) Remove Dol Crown Lands & Water as lead agency.</p> <p>(2) Another column that acknowledges and identifies 'Supporting' agencies would assist with implementation; identifying Dol Crown Lands & Water where authorisations are required from the department.</p> <p>(3) Further discussions required with the Scout Association of Australia as they are more likely to be the lead agency.</p>	<p>(1) Minor edit.</p> <p>(2) Noted.</p> <p>(3) Consultation with The Scout Association of Australia, NSW Branch required as they are more likely to be the lead agency. Modify wording in action - further consultation and discussion needs to be completed to confirm lead agency.</p>
	<i>B14 "Repair bank stabilisation works along Brunswick River training wall at site BR18"</i>	Dol Crown Lands and Water	<p>Above the MHWM, Site BR18 is located on land under the care control and management of the NSW Crown Holiday Parks Trust. Below the MHWM, Dol Crown Lands & Water are responsible for authorising proposed bank stabilisation works, where there is no Appointed trust manager.</p>	<p>(1) Remove Dol Crown Lands & Water as lead agency.</p> <p>(2) NSW Crown Holiday Parks Trust should take the lead on this action. Further consultation may be required with the Trust.</p>	<p>(1) Minor edit.</p> <p>(2) Further discussions required with NSW Crown Holiday Park Trust as they are more likely to be the lead agency. Modify wording in action - further consultation and discussion needs to be completed to confirm lead agency.</p>

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	<i>IR1 "Determine current status of recreational and commercial activities and their impact estuary health and user values and develop a guidance document for the sustainable management of commercial activities"</i>	Dol Crown Lands and Water	<p>The intent of this action is unclear. The CZMP should have largely addressed these issues and made appropriate recommendations.</p> <p>The need for an MoU as an output to this action is not established.</p> <p>Council would need to take the lead on this action.</p>	<p>(1) Remove DoI Crown Lands & Water as the lead agency.</p> <p>(2) DoI Crown Lands & Water may play a support role for this action, subject to further clarification.</p>	<p>(1) Minor edit.</p> <p>(2) Add Support Agency column.</p>
	<i>Appendix D Conflicts of Estuary Use Foreshore Access</i>	Dol Crown Lands and Water	<p><i>'The three holiday parks, Ferry Reserve, Massey Greene and Terrace Reserve, are now the responsibility of, and managed by, the NSW Department of Industry – Lands (Crown Lands).'</i></p> <p>This is incorrect, the holiday parks are managed by the NSW Crown Holiday Parks Trust.</p>	<p>(1) Amend text as follows:</p> <p><i>"The three holiday parks, Ferry Reserve, Massey Greene and Terrace Reserve, are now the responsibility of, and managed by, the NSW Crown Holiday Parks Trust"</i> Department of Industry – Lands (Crown Lands).'</p> <p>(2) As previously stated, the NSW Crown Holiday Parks Trust should be consulted as part of developing the CZMP.</p>	<p>(1) Minor edit.</p> <p>(2) Noted.</p>

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	<i>B2 "Undertake on-ground works (structural bank stabilisation and revegetation) along Simpsons Creek at bank erosion sites SI05 and SI06"</i>	National Parks and Wildlife Service	<p>BSC asked NPWS for comment on Recommended Strategy B2 (Simpsons Creek – Sites SI05 and SI06) as BSC records (GIS) indicate that both sites are located within Tyagarah Nature Reserve.</p> <p>NPWS supports the development of a Precinct Plan (Action 1) which should consider the suitability of the land north of SI05 and SI06 for formalisation of public access.</p> <p>NPWS supports Action (4) '<i>Undertake revegetation works to increase riparian vegetation buffer</i>'.</p> <p>NPWS does not support hard bank stabilisation options and would prefer a softer approach.</p> <p>NPWS requests BSC register the Aboriginal midden.</p> <p>NPWS notes that any works proposed in the vicinity of an Aboriginal midden is an offence under the NPW Act without an exemption or defence provided under the Act.</p>	BSC survey the area to accurately determine the boundaries of the Crown land and Nature Reserve in this area. Should the proposed works occur on-park the CZMP will need to be amended accordingly.	Noted. Further discussions required to clarify land tenure at these sites and the registration of Aboriginal midden. Modify wording in action - further consultation and discussion needs to be completed to confirm land tenure and responsible agencies.
	General Comment	NSW Crown Holiday Parks Trust (now called Reflections Holiday Parks)	The Trust continues to support BSC in the delivery of the CZMP for the Brunswick Estuary. The Trust recognises the importance of the estuary and its management for the local and NSW community.	Comment only.	Noted.

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	B2 "Undertake on-ground works (structural bank stabilisation and revegetation) along Simpsons Creek at bank erosion sites S105 and S106"	NSW Crown Holiday Parks Trust (now called Reflections Holiday Parks)	Recommended Strategy B2 defines NSWCHPT as the lead agency. The Trust requests that they are removed from this action. <i>"The ability of the Trust to lead design and repair to the seawall and its follow up structural maintenance is not within the core activities of the Trust"</i> .	Remove Trust from Lead agency role.	Not supported. Further consultation is required with the Trust as the sites are located predominantly within NSWCHPT land, therefore making them a lead agency for this strategy. Also there are now more actions for which they have been allocated as Lead Agency, as per Crown Lands & Water comments. Modify wording in action - further consultation and discussion needs to be completed to confirm lead agency.