

DPIE (Environment Energy and Science Group)

Scoping Study Assessment Tool

Name of Scoping Study:	Cape Byron to South Golden Beach Scoping Study
Council(s):	Byron Shire Council
Synopsis/Key issues:	Immediate coastal erosion hazard risks to development and infrastructure at Clarkes and Main Beach, Belongil Beach and New Brighton Beach. Projected underlying long-term recession risks and sea level rise induced recession risks at Clarkes, Main, Belongil, New Brighton, and South Golden Beaches.
DPIE contact officer:	Ben Fitzgibbon
Planning and Risk endorsement:	N/A – Regional B&C comments prepared and discussed with P&R.

Document History

Version	Date submitted to EES:	Reviewed by:	Date Review Complete	Action
Revision 1 – 30 October 2019	25/11/2019	B&C (NE)	19/05/2020	

Process Guide: EES review by regional officer. Optional peer review by CPB.

Criteria	Yes	No
Is fast tracking proposed? If no, complete Table 1. If yes, please complete Tables 1 and 2		No
Are changes to Coastal Management Areas mapped under the SEPP proposed to be addressed through a planning proposal		No

Table 1 – CMP Scoping Study assessment sheet

Task	Evidence required	Adequate (Yes / No)	Comments
Stakeholder Engagement	Public authority involvement <ul style="list-style-type: none"> Have relevant public authorities been involved in the development of the Scoping Study? 	Yes	Section 4.5.2.3 and Appendix E describes consultation in some detail.
	<ul style="list-style-type: none"> Is there evidence of (relevant) public authority commitment to ongoing involvement in CMP development? 	Yes	Council has consulted with agencies and will continue to do so in CMP development.
Determine the strategic context of Coastal Management	Environmental Context -The document provides an overview of the environmental context, including <ul style="list-style-type: none"> physical features / coastal processes 	Yes	Section 3.5.2
	<ul style="list-style-type: none"> sediment compartment / estuary catchment 	Yes	Section 3.5.2
	<ul style="list-style-type: none"> habitat condition / extent 	Yes	Section 3.5.1 and 3.5.2
	<ul style="list-style-type: none"> significant storm or environmentally significant events since most recent study / coastal plan 	Yes	Section 3.5.2.4
	Social Context - The document provides an overview of the social context including a description of: <ul style="list-style-type: none"> community demographics / population projections 	Yes	Section 3.7
	<ul style="list-style-type: none"> seasonal fluxes 	Yes	Section 3.7
	<ul style="list-style-type: none"> cultural context / Aboriginal cultural heritage and use 	Yes	Section 3.8
<ul style="list-style-type: none"> social values 	Yes	Section 3.7 and 3.8	

Task	Evidence required	Adequate (Yes / No)	Comments
	<ul style="list-style-type: none"> projected use of coastal land for infrastructure, housing, commercial, recreational and conservation purposes. 	Yes	Section 3.3.3
	<p>Economic Context-The document describes the economic context including coastal related tourism, industries and aquaculture</p>	Yes	Section 3.9
	<p>Legal / Planning Context – The document provides an overview of</p> <ul style="list-style-type: none"> legislation, land tenure and Environmental Planning Instruments 	Yes	Section 3
	<ul style="list-style-type: none"> public authority roles 	Yes	Section 3.6 and Appendix C
	<ul style="list-style-type: none"> existence of a previous Coastal / Estuary Plan 	Yes	Appendix B
	<ul style="list-style-type: none"> other strategic / planning documents (such as CSP) 	Yes	Section 3 and Appendix B
	<ul style="list-style-type: none"> the strategic direction established for the coast through planning documents 	Yes	Section 3.3
	<p>Barriers- The document identifies barriers including political, governance or capacity.</p>	Partial	<p>Section 2.3</p> <p>Legal issues including court cases and settlements should be better acknowledged as needing assessment with regard their potential impact on the viability or feasibility of relevant management options that will be assessed in Stage 3 of the CMP development process.</p>
<ul style="list-style-type: none"> Opportunities to overcome these are discussed. 	Yes	<p>Section 2.3 and 5.4</p> <p>Previous and enclosed (below) comments have been issued to Council on resourcing issues. This is a work in</p>	

Task	Evidence required	Adequate (Yes / No)	Comments
			progress and the subsequent stages of the CMP will need to consider funding and resourcing constraints and opportunities.
Establish the purpose, vision and objectives	Vision statement – The vision reflects the local context while remaining consistent with the states overarching vision of managing the coastal environment in a manner consistent with the principles of ESD for the social, cultural and economic well-being of the people of NSW.	Yes	Section 2.4
	Objectives – Objectives are <ul style="list-style-type: none"> • consistent with the 13 objects of the Coastal Management Act 	Yes	Section 2.4
	<ul style="list-style-type: none"> • consistent with management objectives in the SEPP 	Yes	Section 2.4
	<ul style="list-style-type: none"> • in alignment with the community strategic plan 	Yes	Section 2.4
	<ul style="list-style-type: none"> • realistic 	Yes	Section 2.4
	<ul style="list-style-type: none"> • measurable 	Yes	Section 2.4
Identify the scope of the CMP including key management issues and areas	Issues The document provides a list of key issues for consideration in the CMP	Yes	Section 4.4
	First pass risk assessment – The risk assessment process: <ul style="list-style-type: none"> • includes tailored likelihood and consequence scales that are valid, transparent and applicable to 	Yes	Sections 4.5 and 4.6

Task	Evidence required	Adequate (Yes / No)	Comments
	environmental, social and economic consequences		
	<ul style="list-style-type: none"> utilises information provided through regional scale assessments such as TARA, framework for water quality and hazard mapping where locally specific information is not available 	Yes	Sections 4.5 and 4.6
	<ul style="list-style-type: none"> describes and assesses the vulnerability (including sensitivity and tolerance) of environmental, economic and social/cultural values to coastal risks describes and assesses benefits and opportunities (including without limitation risks to environmental, social and economic values) 	Yes	Sections 4.5 and 4.6
	<ul style="list-style-type: none"> considers pathways and planning timeframes from now, 20 years, 50 years and 100 years and beyond (where appropriate) 	No	Recommend Section 2.4.4 is amended to require Stage 2 and 3 activities, and the CMP to be prepared in accordance with Mandatory Requirement 2.
	<ul style="list-style-type: none"> demonstrates consideration of a range of future scenarios including rare or potentially catastrophic events 	Yes	Section 3.5.2 and 4.6
	<ul style="list-style-type: none"> presents the results in a clear manner 	Yes	
	<p>Assessment of adequacy of existing information – The document discusses the adequacy of information available for hazards and threats to inform future stages including:</p> <ul style="list-style-type: none"> available hazard mapping and suitability cognisant of the risk levels 	Yes	Section 4.6
	<ul style="list-style-type: none"> level of uncertainty for high priority risks 	Yes	Section 4.6

Task	Evidence required	Adequate (Yes / No)	Comments
	<ul style="list-style-type: none"> location and integrity of coastal protection works (if available) 	Yes/Partial	Section 3.5.2.3 The Manfred Street Interim protection works have not been described, nor have the 2001 interim geobag walls installed at Border, Don St. These structures are relevant to management of the coastal area and should be acknowledged.
	<ul style="list-style-type: none"> coastal and catchment processes 	Yes	Section 3.5.2, Table 4-3, Appendix G. The adequacy of existing coastal processes information is not necessarily described in a designated review. However, the SS does describe the existing work, identifies information gaps, and advocates an update of relevant information as per Section 4.6 and 6.6.
	<ul style="list-style-type: none"> climate change 	Yes	Section 3.5.2, Section 3.1, Table 4-3
	<ul style="list-style-type: none"> other threats to environmental and social values 	Yes	Section 3 and Table 4-3
	Coastal Management Areas –The document <ul style="list-style-type: none"> maps coastal management areas 	Yes	Section 1.4.1 describes how the areas are mapped. Figures 1.5-1.8 show mapping.
	<ul style="list-style-type: none"> assesses the suitability of management areas to address identified high priority issues 	No	There does not appear to be a section designated to this consideration. However, this is not considered critical given the SS advocates mapping the Coastal Vulnerability Area via a planning proposal through the CMP process. Mapping the CVA will provide the associated linkage to the SEPP (Coastal Management) 2018. This will assist in managing the identified high priority issues.
	<ul style="list-style-type: none"> identifies where modifications to boundaries may be sought through a planning proposal? 	Yes	N/A but noting the SS proposes mapping the CVA.

Task	Evidence required	Adequate (Yes / No)	Comments
	<p>CMP spatial extent –The document demonstrates that:</p> <ul style="list-style-type: none"> Provides rationale for selecting the proposed CMP area is appropriate and whether it applies to all or part of the coastal zone 	More information recommended	<p>Section 1.4 and 2.2 Council has limited resources and is focussing on the highest risk issues and areas before commencing the CMP process for the remaining areas of the Shire’s coastal zone.</p> <p>Section 1.4 and 2.2 should provide more information and justification on the selected area (S.1.4) and the rationale behind the recommended process to develop CMP’s for the whole coastal zone.</p>
	<ul style="list-style-type: none"> consideration has been given to sediment compartment and catchment boundaries 	Yes	Section 1.4.2 and 2.2
	<ul style="list-style-type: none"> benefits and drivers for larger spatial areas have been considered 	Yes	Section 2.2
Review the current coastal management arrangements	<p>Existing Management Plans- The document includes:</p> <ul style="list-style-type: none"> details of previous coastal management related plans 	Yes	Appendix B
	<ul style="list-style-type: none"> an audit of implementation 	N/A	No certified CZMP exists. Some of Council’s coastal management activities are briefly described in Section 3.5.2.3.
	<ul style="list-style-type: none"> outcomes for actions implemented against intended indicators 	N/A	N/A
	<ul style="list-style-type: none"> analysis of implementation barriers for outstanding actions 	N/A	N/A

Task	Evidence required	Adequate (Yes / No)	Comments
	<ul style="list-style-type: none"> learnings from implementation process 	N/A	No certified CZMP exists. Some of Council's coastal management activities are briefly described in Section 3.5.2.3.
	<ul style="list-style-type: none"> analysis of coastal emergency response or impacts where a storm event has occurred during the implementation phase 	N/A	<p>There is no section designated to assessing the effectiveness of Council's coastal emergency response activities.</p> <p>Council do appear to operate under an EASP which guides their emergency response. The EASP is an internal working document only.</p>
	<ul style="list-style-type: none"> commentary of integration with IP&R 	N/A	
	<ul style="list-style-type: none"> details of monitoring undertaken 	N/A	
Identify roles and responsibilities	<p>Responsibilities for CMP development. The document</p> <ul style="list-style-type: none"> nominates a lead applicant for CMP development 	No	Council has advised that DPIE will be identified as a 'support' agency only. That the 'Responsibility' column will be split in to include a 'Support' column also.
	<ul style="list-style-type: none"> provides evidence of adequate engagement with other public authorities 	Yes	Section 4.5.2.3 and Appendix E describes consultation in some detail.
	<ul style="list-style-type: none"> describes a governance structure that will facilitate collaboration <p>(This may include a description of any intended advisory groups, MoUs etc.)</p>	Yes	Section 6.4.1 and Table 6-1.
Determine where action is required	<p>Prioritised list of risks- The document includes a prioritised list of risks including those resulting from coastal hazards and those related to other threats to coastal values</p>	Yes	Section 4.4 to 4.6

Task	Evidence required	Adequate (Yes / No)	Comments
	Knowledge Gaps- The document provides an appropriate prioritised list of knowledge gaps to be filled in later stages	Yes	Section 4.4 to 4.6 and Section 6.
	Determine where action will be required in stage 2 – The document recommends appropriate further studies for stage 2	Yes	Section 4.4 to 4.6 and Section 6.
Prepare a community and stakeholder engagement strategy	Who - The community and stakeholder engagement strategy identifies: <ul style="list-style-type: none"> the broad community, industry and internal and external public authority stakeholder groups to be engaged in developing a CMP the level of participation for each group (using IAP2 Spectrum or similar) 	Yes	Appendix A
	How – The community and stakeholder engagement strategy identifies: <ul style="list-style-type: none"> a range of proposed strategies for engagement to reach the target audience pathways to engage with aboriginal people and communities specific stakeholder consultation required to align with the preparation of a planning proposal how the community and stakeholder engagement strategy will be evaluated 	Yes	Action S2.05 and S3.05, and Appendix A. The specific stakeholder consultation required to align with the preparation of a planning proposal will be determined during Stage 2 or 3, as implied in the actions noted above.
	What - The community and stakeholder engagement strategy describes: <ul style="list-style-type: none"> the aims and key messages for community and stakeholder engagement specific mapping required to align with the preparation of a planning proposal 	Yes	Action S2.05 and S3.05, and Appendix A. The Stakeholder and Community Engagement Strategy is considered fit for purpose. If Council decide to prepare a planning proposal to map the CVA (or amend any other CMA), then a community engagement

Task	Evidence required	Adequate (Yes / No)	Comments
	<ul style="list-style-type: none"> how the community will be consulted in the preparation of a planning proposal how stakeholders will be consulted in the preparation of a coastal zone emergency action subplan (where CVA is to be mapped) 		strategy for that undertaking will be developed at that time, as implied in the actions noted above.
	<p>When – The community and stakeholder engagement strategy:</p> <ul style="list-style-type: none"> indicates timing for key engagement activities considers specific stakeholder consultation required to align with the preparation of a planning proposal 	Yes	Appendix A.
Prepare a preliminary business case	<p>Business case – The scoping Study outlines:</p> <ul style="list-style-type: none"> components required to develop a CMP including costs/funding mechanisms, responsibilities and indicative timeframes 	Yes	Section 5 and 6.
	<ul style="list-style-type: none"> the benefits of preparing a CMP as proposed 	Yes	Section 5.2
	<ul style="list-style-type: none"> the risks associated with preparing and not preparing the CMP 	Yes	Section 5.3
	<ul style="list-style-type: none"> fit with the IP&R framework 	Yes	Section 6.5
	<ul style="list-style-type: none"> support from relevant public authorities for the process proposed 	Uncertain	Consultation with agencies has been ongoing. Section 6.6 describes that more detailed assessment is required by state agencies to adequately assess the draft SS? Has this happened?

Task	Evidence required	Adequate (Yes / No)	Comments
			What is the status of state agency agreeance to be a part of the relevant proposed studies and activities in preparing a CMP?
Develop a forward program	Timeframes – are realistic around CMP development such as grant acquisition, consultation, review and exhibition	Yes	Section 6 Forward Plan.
	Planning Proposal (PP) – <ul style="list-style-type: none"> Will a PP be prepared to amend council’s Local Environmental Plan (LEP) to include updated boundaries for any coastal management area? Where a PP is proposed, it is this integrated with the proposed CMP preparation time frame? 	Yes	Planning Proposal identified in action S4.02. If required is proposed for Op. Plan 2022-2023.

Table 2 – Fast-tracking proposal assessment sheet (Mandatory Requirement 7)

Evidence required	Adequate (Yes / No)	Comments
What fast-tracking is proposed?		<i>Is the council proposing to fast-track from stage 1 to 4, or only complete parts of stages 2 to 3. Please describe the proposal.</i>
Has fast-tracking been justified?		<i>Please demonstrate how this justification is consistent with section 1.11.2 of the manual</i>
Do existing assessments (of coastal risks/ vulnerabilities and opportunities/ evaluation of management options) provide sufficient information to enable council to prepare the CMP		<i>Please describe how the information enables preparation of a CMP in accordance with mandatory requirement 8 and sections 14 and 15 of the CM Act</i>
Has the effectiveness of the existing coastal management been assessed and described?		<i>Please describe how the existing management approaches have been considered and assessed.</i>
Have any circumstances concerning the coastal management of the study area changed?		<i>Please describe how the effectiveness existing coastal management has been considered for the study area?</i>

Table 3 - Recommended Changes to the Draft Scoping Study

Reference	Recommended Change
Table 6-2 – Forward Plan	Item S2.01 – This action is supported; however, it would be appropriate to seek the advice (if not already) of NPWS and Crown Lands on their need for such information and willingness to contribute funding to completing the exercise on land under their management jurisdiction.
Table 6-3 – Forward Plan	Is Crown Lands nominated to fund and undertake this Brunswick Heads breakwater investigation? Have Crown agreed to this?
Section 1.4 - Study Area	This section should provide a clear justification of why the CMP is proposed for the subject area and risk management is the basic reason. Council are focussing on the highest coastal hazards risk areas of the shire, within the constraints of internal resources and funding at this time.
Section 2.2 - Prepare a CMP for Cape Byron to SGB...	Please explain why ‘...this portion of coastline experiences the most complex and challenging management issues of the Shire...’. Clear context is needed to provide adequate justification to the community and Council on why only this management area is the subject of such a significant focus of resources, effort and time to prepare a CMP. We note in particular the difficulties to-date in finalising a certified plan for the area, and coastal hazard risks given proximity of development and infrastructure to back beach escarpment etc.
Section 2.2 – Prepare a CMP for Broken Head to Cape Byron... Prepare a CMP for Belongil Creek	This will need to be amended to reflect the project CMP for Seven Mile Beach to Cape Byron, Tallow Creek and Belongil Creek Catchments.
Section 2.4.1 - Purpose	<p>The purpose of the scoping study is to also describe the strategic context of coastal management; describe the purpose vision and objectives of the CMP, review the effectiveness of current management practices and arrangements, identify coastal management issues and knowledge gaps that need filling and ...identify the scope of the CMP etc. Let’s make it clear for the community and other stakeholders.</p> <p>Part B (Stage 1) of the Coastline Management Manual provides relevant information.</p>
Section 2.4.4	<p>The recommended planning timeframe for the CMP should be now, 20, 50, and 100 years (and beyond if Council deems appropriate) in accordance with Mandatory Requirement 2 in the Coastal Management Manual.</p> <p>The studies undertaken over the CMP development process including the coastal hazards update would then be considered over these timeframes, as would management actions defined in the CMP.</p>

Section 3 – Strategic Context

Reviewing the current coastal management arrangements

This whole section provides an overview of coastal management context in the Byron Shire including strategies; plans; legislation and policy; environmental, social, cultural, and economic context and values. When reading the section, it becomes apparent that while all of these relevant subjects are being described, there is no accompanying critical analysis of the ‘effectiveness’ of the subject in managing the identified issues and threats, or the vulnerabilities and opportunities associated with each. While this may not be inappropriate, it is relevant to the following discussion.

It is acknowledged that the First Pass Risk Assessment analysis (section 4.5) provides an evaluation of current management arrangements and identifies key knowledge gaps. However, the analysis seems to overlook consideration of the adequacy of some coastal management arrangements.

For example; Issue 1, Threat 1 in Table 4-3 relates to beach erosion. The DCP is listed under the current management arrangements column. However, nowhere in this analysis is the ‘effectiveness’ of the DCP in Council’s coastal management approach, or the vulnerabilities and opportunities associated with the DCP described. Is the DCP adequate, or are there issues? What about the LEP?

There is an opportunity to embellish the assessment of the effectiveness of coastal management arrangements undertaken the First Pass Risk Assessment. This may be achieved in Section 3 for example by including an analysis section under each relevant plan/strategy/coastal management issue or action entitled something like “Effectiveness and Recommendations”. Such an analysis would provide for a broader and more descriptive consideration of the effectiveness of coastal management in the Shire, that may be more readily interpreted by the community and stakeholders (when compared to the information in the FPRA). It may also identify additional opportunities for improvement for consideration in Stage 2 and beyond.

For example:

3.3.4 Local Level Plans – Consider the effectiveness of DCP and LEP, the Master Plan, any vulnerabilities or opportunities for improvement

3.5.1 Values – Are the flora, fauna, landscape, and water quality values being managed well, any vulnerabilities or opportunities for improvement?

3.5.2 Coastal processes, Hazards and management – Do we have an effective understanding, are there vulnerabilities or opportunities?

3.5.2.3 Coastal management strategies - Managed well? Any vulnerabilities or opportunities for improvement?

3.5.2.4 Recent coastal events – Is the EASP effective? Vulnerabilities and Opportunities?

3.5.2.5 Water Quality - Managed well? Any vulnerabilities or opportunities for improvement?

3.6 Governance - Managed well, any vulnerabilities or opportunities for improvement?

3.6.2 Legal Context – How effective is management in the legal context? What are the vulnerabilities or opportunities associated with legal issues; i.e. what are the implications of the legal cases, Supreme Court settlement (Belongil DA’s) on coastal management context? Do we need to answer questions to understand the context of these issues for coastal management?

3.7.2 - Tourism and visitation etc...

	<p>Another way to try and improve the rigour of the review of current coastal management arrangements is to embellish the First Pass Risk Assessment with those categories above and as described throughout Section 3, where they are not already identified in the FPRA.</p> <p>Section 1.6 (Part B, Stage 1) of the Coastal Management Manual covers this discussion – How is the coast managed now? Were expected outcomes achieved? Have actions been delivered as planned? What has been learnt about effective management, what are the major challenges and what are the opportunities to improve the situation?</p>
Section 3.3.2 – third paragraph	NSW Marine Estate Strategy (2018 – 2028)...
Section 3.3.4 – Local Level Plans	<ul style="list-style-type: none"> • It would be appropriate to describe the Byron Development Control Plan and its relevance to coastal management in some more detail. The Emergency Action Subplan might be relevant here also. Although not part of a certified CZMP, if the EASP guides Council’s management of coastal erosion events it should be acknowledged. • Pls amend heading - Reflections Holiday Parks Trust
Section 3.5 – Environmental Context	The scoping study should describe how coastal wetlands and littoral rainforest is managed across the study area. Is this adequate, are there associated vulnerabilities or opportunities? This would help introduce and contextualise the relevant information in the first pass risk assessment (Issue I3).
Section 3.5.2.3 – Coastal Management Strategies	<p>Management Strategy 1 describes coastal protection works. The following should also be included: Manfred St works; temporary geobags at Byron Surf Club, Border and Don St; Brunswick Heads break waters.</p> <p>It would be appropriate to provide some more information on coastal management activities 4, 5 and 6, and including the Clarkes Beach Stormwater gully rehabilitation project, Main beach lagoon management, Belongil Estuary entrance management, ranger activities (illegal camping, dogs, parties, etc), coastal amenity infrastructure installation and maintenance program. Descriptions need only be brief but will help to set the context of Councils current coastal management activities.</p>
Section 3.5.2.5 – Water Quality and Water Quality Processes	Management of the Clarkes Beach storm water outlet (Adjacent Clarkes Beach Holiday Park) is a key project that is worthy of further acknowledgement under this section. What is the project, why is it needed (Aboriginal midden, dune erosion, risk, etc)? The project could be further described under section 3.5.2.3 Coastal Management Strategies
Section 3.6 – Governance Context	Recommend acknowledging the Arakwal Indigenous Land Use Agreements and co-management framework in the opening paragraph of this section.

<p>Section 3.6.2 – Legal Context</p>	<p>This section should be expanded to more adequately acknowledge and highlight relevant court cases and settlements, and the relevance of these to coastal management at the subject locations. The potential implications of legal cases on the feasibility of coastal management options will need to be considered in the CMP development process. The Scoping Study should make this clear.</p>
<p>Section 4.3 – Coastal Management Areas...</p>	<p>Recommend including reference to Section 2 (Overarching strategy for Byron’s Coastal Management) in this discussion. To highlight how the remaining areas of the Shire’s coastal zone will be considered in subsequent CMP’s.</p>
<p>Section 4.4.2 – Threats to Byron Coastline Section 4.6 - First Pass Risk Assessment Section 6 – Forward Plan</p>	<p>Funding and resource constraints are considered a key management issue and might be considered a threat to the ongoing and improved management of the subject CMP area (as they are for the remainder of the Shires coastal zone). This threat could be included in Table 4-1.</p> <p>It would be beneficial to consider key knowledge gaps associated with this ‘threat’. One knowledge gap for example, might include the communities, private landholder’s, and businesses ‘willingness to pay’ for coastal management options. Another knowledge gap might include a detailed understanding of possible options to raise funds from visitors to the Byron Shire who visit the coastal areas of the CMP area (following on from the analysis in section 3.7.2 ‘Tourism and Visitation’).</p> <p>Investigations to fill these knowledge gaps (for example) could be undertaken in Stage 2 and 3 of the CMP process and would be tailored according to the refined coastal management strategies being considered by Council through that process.</p> <p>It is recommended the Study is amended to further acknowledge funding and resource constraints, and to identify studies or activities in Stage 2 and 3 aimed at resolving these issues. For example, and depending on the management approaches determined by Council through the CMP process; targeted discussions with the community, landholders, businesses, or investigations into fund raising mechanisms may have additional cost implications for the CMP development.</p>
<p>Section 4.6, Table 4-3 – First Pass Risk Assessment Issue 1</p>	<p>Issue 1 - With regard coastal hazards and Stage 2 studies the following is recommended:</p> <ul style="list-style-type: none"> Given Council has now confirmed commencement of the Stage 1 Scoping Study for Seven Mile Beach to Cape Byron, Tallow and Belongil Creek Catchments, it is recommended Council consider updating the BMT WBM (2013) hazard study with a probabilistic hazard re-assessment on a Shire-wide basis to cover Seven Mile Beach (northern end), Suffolk Park and Tallow Beach, Cape Byron to Tyagarah Nature Reserve, New Brighton to South Golden Beach. The Arakwal NP, Tyagrah NP and Brunswick NR might be excluded from this probabilistic assessment to reduce costs. But as identified in the Scoping Study would benefit from hazard mapping using the BMT WBM (2013) work.

	<ul style="list-style-type: none"> • Probabilistic hazard data is not considered necessary for the national park and nature reserve areas other than Clarkes Beach (Cape Byron State Conservation Area) where such information may assist NPWS, Arakwal, and Reflections in their management decisions. Wategos Beach will need to be further discussed with geotechnical investigation to inform hazard deliberations. • The hazard reassessment would consider the adequacy of the key assumptions of BMT WBM (2013). Coastal erosion, underlying long-term recession, and sea level rise induced recession would be reassessed probabilistically. Coastal inundation could be considered for review but is perhaps appropriately assessed in BMT WBM (3013) and fit for purpose. Indeed, any hazard update should consider the inundation work in context. • As per Mandatory Requirement 2 of the Coastal Management Manual, any hazard review would be best undertaken for current day, 20, 50, 100 years and beyond (if council requires). • The hazard re-assessment could consider the possible migration of the Belongil Estuary entrance over the planning timeframes. • The hazard re-assessment could include the slope and cliff instability assessment. • The hazard re-assessment could inform the current Main Beach Shoreline Project, in particular the cost benefit analysis of modification options. • A shire-wide hazard reassessment (using a probabilistic approach) would provide standardised contemporary data for the potential mapping of the coastal vulnerability area via a planning proposal. • It is noted that Tweed Shire Council intend to undertake a similar (probabilistic) update of their BMT WBM (2013) coastal hazard study. There may be efficiencies achieved in a collaboration with Tweed as was done in 2013.
<p>Section 4.6, Table 4-3 – First Pass Risk Assessment</p> <p>Issue 2</p>	<p>T7 - Resource constraints (compliance officers, etc) are a key issue with regard loss of amenity and conflicts between user groups and should be acknowledged here.</p> <p>Another key issue is homelessness and competition for space. Will the CMP attempt to deal with homelessness and/or illegal camping on the coastal fringe, is there a body of policy development work that needs to be done to manage this rapidly increasing issue?</p> <p>Brunswick Heads should be included in the list of key hotspots, in particular the Surf Club area and adjacent Council, Crown and NPWS managed lands.</p> <p>These comments relate to T16 also.</p>
<p>Section 5.1.2 – Governance Bias, second paragraph</p>	<p>Recommend amending the last sentence as follows – “...which may influence coastal processes and have impacts which may be experienced down-drift create associated impacts to the coastal environment.”</p>

Section 5.3.1 – Key Risks...	Limitation of funding – please amend relevant text to the ‘NSW Coastal and Estuary Grants Program’.
Section 5.4.2 – Utilisation of previous investment...	First paragraph – “despite not having a adopted certified coastal management plan...”
END COMMENTS	