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## **Re: Review of the NSW Coastal Design Guidelines**

Dear Danijela,

Thank you for the opportunity to comment on the scope for the review of the NSW Coastal Design Guidelines.

SCCG currently represents nine estuarine and coastal councils in Sydney which collaborate to advance sustainable management of Sydney's urban coastal and estuarine environment. Our goals include our waterways and the foreshore being protected and healthier.

As I understand, The Department of Planning, Industry & Environment (DPIE) is tasked under the Marine Estate Management Strategy 2018-2028 (MEMS) with reviewing and updating the Coastal Design Guidelines for NSW (2003) and has asked coastal councils to assist with this. The DPIE clarified for SCCG that the initial focus is defining the scope for the review and consultation at this stage is mainly to ascertain from councils how they use the Guidelines and would like to use them in future. SCCG is providing a response to DPIE's request for input to the scope of the review, combining high level coastal management issues and individual responses from councils on the usefulness of the Guidelines for local planning and development.

Please see below responses to the questions posed to guide the scope of the review, on behalf of member councils of the SCCG.

### **1. Which sections of the Guidelines are working well?**

The structure of the Guidelines into three parts is useful for the planning process, firstly identifying the settlement type within a hierarchy which helps distinguish scale and complexity of development followed by the application of design principles for the settlement type and concluding with implementation. Overall, while outdated and in need of review, the Guidelines still contain many provisions which are relevant for strategic planning along in NSW.

The differentiation of the different scale of townships and building typologies with tailored guidelines are beneficial to assist in plan making which is tailored and fine grain. The Guidelines need to contain the level of detail they currently have in order to provide a solid framework for local government planners to plan and make development assessment decisions. The Implementation section could have a more detailed structure and incorporate monitoring, evaluation and review. The scope of the review should include consideration of

the level of detail and appropriateness as a framework for local government in both strategic planning and development assessment.

## **2. What sections of the Guidelines would you like the Department to prioritise for review and update?**

The scope of the review should include updates for consistency with the current coastal management framework and local government planning framework. References to relevant building and planning guidelines would be more helpful at the appropriate points throughout the document, rather than just being included in 'References and further reading' at the end. For example, risk assessment of local hazards needs to link to specific climate change and sea level rise planning and technical guidance.

## **3. What else could we include in the Guidelines to assist councils in developing strategic plans for coastal areas?**

Many councils have in place Coastline Zone Management Plans or are preparing or transitioning to Coastal Management Programs as well as updating existing flood studies. Significant consideration is being given to the impact of sea level rise. The vision of the Coastal Design Guidelines is that "the coastal edge is ideally a publicly accessible system of foreshore and natural reserves extending along the NSW coast" and recommends that new strategies for development need to "provide for improved access to the NSW coast". However, no guidance is provided regarding mechanisms that may be used to ensure public access under future sea level rise.

The Guidelines also place significant emphasis on maintaining public access along the foreshore, however much of the NSW coastal foreshores are privately owned and have been for some time. The Guidelines should acknowledge that in areas of metropolitan Sydney, the provision of public access to the foreshore is difficult and in some cases, impossible where development and private ownership has occurred. The scope of the review should include clarifying the context for public access to the coast.

The Guidelines largely relate to new Greenfield development of the coastal environment. The Guidelines need to give more guidance and acknowledgement of existing developed areas on the coast and infill development within these areas as this is the predominant form of new development on many parts of the coast and within metropolitan Sydney. It is also unclear if the Guidelines are applicable to coastal and estuarine areas in metropolitan Sydney although "coastal cities" are a settlement type. The scope of the review should include applicability to new and existing development within regional and urban settings.

Also, it is unclear how the Guidelines provide any guidance on the design of infrastructure or replacement of existing infrastructure. For example, what design would you use to replace existing seawalls? There are a number of definitive publications for the design of seawalls which include consideration of functioning in the design. Please refer to Sydney Coastal Councils Group website to review sea wall design publications as a minimum. It is suggested that references to relevant publications for seawall design, as well as coastal infrastructure design be referenced at relevant sections in the Guidelines and included in the reference list.

## **4. How do you use the Guidelines?**

As an example, Sutherland Shire Council has used the Guidelines for plan making since their inception. The Guidelines were used in the development of Sutherland Shire Local Environmental Plan 2006 and Sutherland Shire Local Environmental Plan 2015 as required by the applicable Ministerial Direction. This has assisted Council in managing the use, development and sustainability of the coastal area through things such as primary development standards for new developments, ensuring environmentally sensitive land is protected and managing the risks of coastal hazards to life and property. The Guidelines are particularly useful when considering new developments and their impact on the coastline

and waterways. Council's strategic planning staff refer to the guidelines in the assessment of any planning proposal affecting the coastal area.

## **5. How would you like to use the Guidelines?**

Councils have indicated continued use of the Guidelines when undertaking future comprehensive LEP updates as well as during the assessment of any minor spot rezonings within the coastal area. The Guidelines need to provide more information and guidance in response to the existing urban design character of an area. As population increases, Councils also have a role in balancing the need for new housing, protecting the natural environment and encouraging the use of the coastal area for tourism and recreational enjoyment. This places significant demand on coastal areas.

The Guidelines need to provide strong guidance on how to sensibly balance the management of growth in housing, tourism and usage of the coastal environment against protecting the fragile natural coastline. They also need to consider how the coast line can be managed under a changing climate which is likely to result in an increase in coastal protection works.

Further information could be given to outline the principles and strategies for managing environmentally, economically and socially sustainable development. The Guidelines could provide planners with guidance on how to deal with growth through consolidation, growth on the fringe and growth in new release areas with objectives and design principles for each of these scenarios.

## **6. Is there anything else you would like to tell us?**

For councils updating hazard studies to include objectives and controls relating to coastal hazards and sea level rise and their impacts on new development, the Guidelines could provide more guidance in relation to these hazards. Consideration could also be given to the following:

- clear objectives of the Guidelines, clarifying scope in terms of regional vs. urban; new vs. existing settlement; building and settlement design vs. infrastructure design; and use for development assessment and/or strategic planning
- drainage infrastructure designed to provide for coastal inundation, including storm surge and tidal inundation as well as land based stormwater
- choice of sustainable construction materials, based on coastal climate change variables
- design life of buildings, based on acceptable risk to climate change
- extent that the Guidelines should cover the design of coastal infrastructure and response to climate change
- identifying the value of the coast; reference 'My Coast' study, MEMA coast survey and MEMA threatened assessment framework
- applicability to estuaries.

SCCG member councils have also recommended that the following references are reviewed for the revised Guidelines:

1. Sydney Coastal Councils Group study report on 'Adapting Priority Coastal Recreational Infrastructure for Climate Change' <https://www.sydneycostalcouncils.com.au/projects/adapting-priority-coastal-recreational-infrastructure-for-climate-change/>
2. UNSW 'Climate Change in Estuaries - State of the Science and framework for assessment' <http://estuaries.wrl.unsw.edu.au/index.php/climate-change/risk-assessment-guide/>
3. National Climate Change Adaptation Research Facility (NCCARF), CoastAdapt information delivery and decision support framework <https://coastadapt.com.au/>
4. NCCARF paper 'Funding coastal protection in a changing climate' <https://www.nccarf.edu.au/settlements->

[infrastructure/sites/www.nccarf.edu.au.settlements-infrastructure/files/Funding%20Coastal%20Protection\\_ACCARNSI\\_Discussion\\_Paper\\_1\\_Final.pdf](http://infrastructure/sites/www.nccarf.edu.au.settlements-infrastructure/files/Funding%20Coastal%20Protection_ACCARNSI_Discussion_Paper_1_Final.pdf)

5. *Institute of Public Works Engineering Australasia (IPWEA) [IPWEA Practice Note 12.1: Climate Change Impacts on the Useful Life of Infrastructure](#)* (Note: a follow on [Climate Resilience Design Guide \(funded under an IRCC grant\)](#) is being developed by Northern Beaches Council in partnership with IPWEA that will likely be more relevant to specific Design Guidelines (to be completed mid 2021). It will form *IPWEA Practice Note 12.2: Climate Resilience Design Guide* and be complimentary to sustainable technical guidance which should also be considered.)
6. Green Building Council Australia Rating Tool [Greenstar Design & As Built](#)
7. [Australian Standard Guidelines for the design of maritime structures \(AS 4997-2005\)](#) (note that section 4.6 on sea level rise is outdated referencing IPCC projections from 2001)
8. [CSIRO Report Sea-Level Rise and Allowances for Coastal Councils around Australia – Guidance Material](#)

I trust that the information provided above will be helpful in guiding the scope of the review at this stage. I understand that further opportunities for consultation will be provided to both SCCG and individual councils on an updated draft of the guidelines prior to the formal consultation process, with exhibition anticipated in mid 2020.

If you have any queries, please contact me on 02 9976 1502 or by email at [executiveofficer@sydneycoastalcouncils.com.au](mailto:executiveofficer@sydneycoastalcouncils.com.au)

Yours sincerely,



Sarah Penny Joyce  
**Executive Officer**