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Danijela Karac
Director Environment Policy
Department of Planning, Industry and Environment
coastal@planning.nsw.gov.au

Re: Review of the NSW Coastal Design Guidelines

Dear Danijela,

Thank you for the invitation for the Sydney Coastal Councils Group (SCCG) to comment on the draft NSW Coastal Design Guidelines, prior to proposed public exhibition.

We greatly appreciate your Department being committed to ongoing consultation with our member Councils on these important guidelines. The SCCG previously provided advice on 31 January 2020 on the scope of the guidelines and recently heard from DPIE staff via a webinar on the 15 February 2021 where key aspects of the draft guidelines were outlined and opportunities provided to attendees to ask questions.

The SCCG has collated comments from the webinar as well as written responses received from member councils following. These are presented below and respond to the questions posed in DPIE's factsheet for internal consultation.

Is the approach in the draft guidelines logical and easy to follow?

The structure of the guidelines into separate parts is useful for a planning proposal, for ease of use by the applicant and general public. Chapter 2 "Understanding and characterising a place" will greatly assist in setting the context for applicants seeking a proposal within the coastal area.

The way the Guidelines have been drafted is relatively easy to follow given the complexity in the process for planning proposals. The format of the guidelines in a sequential manner is supported. Identifying the nine systems that may influence coastal places and their catchments helps applicants and planning practitioners determine, at an early stage, the important characteristics of the coastal environment. This helps practitioners understand what that will need to be addressed as part of the planning process followed by the application of design principles for the development type concluded with implementation via practitioner assessment.

The case studies provided are supported as they clearly highlight how the guidelines should be applied and how results should be evaluated. Designing with Country, place-based and a design-led approach is strongly supported.

Improvements are suggested with regards to terminology used. It should be recognised that commonality of language is critical and that a definitions list upfront would be beneficial and that relevant terms align with the NSW Coastal Management Framework where possible. It is suggested that a broader term be used for the coastal community's 'catchment' which covers environmental, social and economic values, drivers and consideration so as not to be confused with the more familiar and common place spatial definition of 'catchment' as it relates to a water catchment.

Are the draft guidelines accessible to those without a background in urban design?

The draft Guidelines contain a range of provisions which are relevant to strategic planning and urban design on the coast. The differentiation of each of the different coastal systems is easy to follow for the lay person, while also being tailored and detailed enough to assist in plan making and decision making. Providing case studies which provide evidence as to how the provisions of the guidelines should be implemented for proponents, is essential for the public to be able to comprehend the document.

The format of Chapter 3 with each of the objectives being identified and supported by suggested strategies to meet the objectives is strongly supported. This works well in assisting both proponents and decision makers on how to achieve the objectives of each of the coastal systems.

It is suggested that for the document to be clearer for the public and planning practitioners, that the headings for the case studies are amended to identify which examples relate to the proponents and which relate to the planning practitioners. Past experience has shown that during customer service enquiries with the public, individuals will often read the example case studies in isolation. Amending the headings to clearly stipulate which case studies apply to proponents and planning practitioners could provide some further clarity in the document.

Are there any urban design considerations which have not been adequately addressed?

Connectivity is central to making an area pedestrian oriented. Streets and pedestrian walkways must be enjoyable to walk, must link key destinations, and must operate at a fine scale. The guidelines should emphasise that areas must be designed to support walking and support animated and vibrant place-making. The document should make reference to the Greater Sydney Commission's Green Grid Strategy that all Councils are directed to prepare. This strategy creates links between areas of interest with a key element being public access to waterways and foreshore.

The strategy to "maximise the relationship between settlements and their natural environments" is supported. Encouraging walking and cycling in coastal communities needs to be a key part of this strategy.

The resilience of design to adapt to changing coastal processes should also refer to the design life of marine structures so that it can be linked to future sea level rise scenarios.

Under section 3.7 Built Form, we request that the document refer to the [IPWEA Practice Note 12.1: Climate Change Impacts on the Useful Life of Infrastructure](#) and Decision Tree developed. Additionally, there will be an addendum scheduled to be published this year that extends the Decision Tree Worksheet and provides climate resilient materials - IPWEA Practice Note 12.2: Climate Resilient Materials for Infrastructure Design (name currently in draft). Ideally, section 3.7 should reference IPWEA Practice Note 12.2 for which a draft should be available during the public exhibition period.

Are the draft guidelines aligned with other NSW Government urban design guidance and practice?

The planning proposal process requires a full assessment against the suite of NSW Policies, Legislation and Guidelines. From an initial review, there does not appear to be any obvious conflicts between the guidelines and other urban design guidance.

It is suggested that prior to a formal submission and gazettal, that the Department of Planning, Industry and Environment conduct a detailed review into the urban design framework to ensure consistency with the guidelines.

The SCCG notes the importance of clear definitions that are relevant to planning proposals to minimise contestability of interpretation of the guidelines.

Other comments

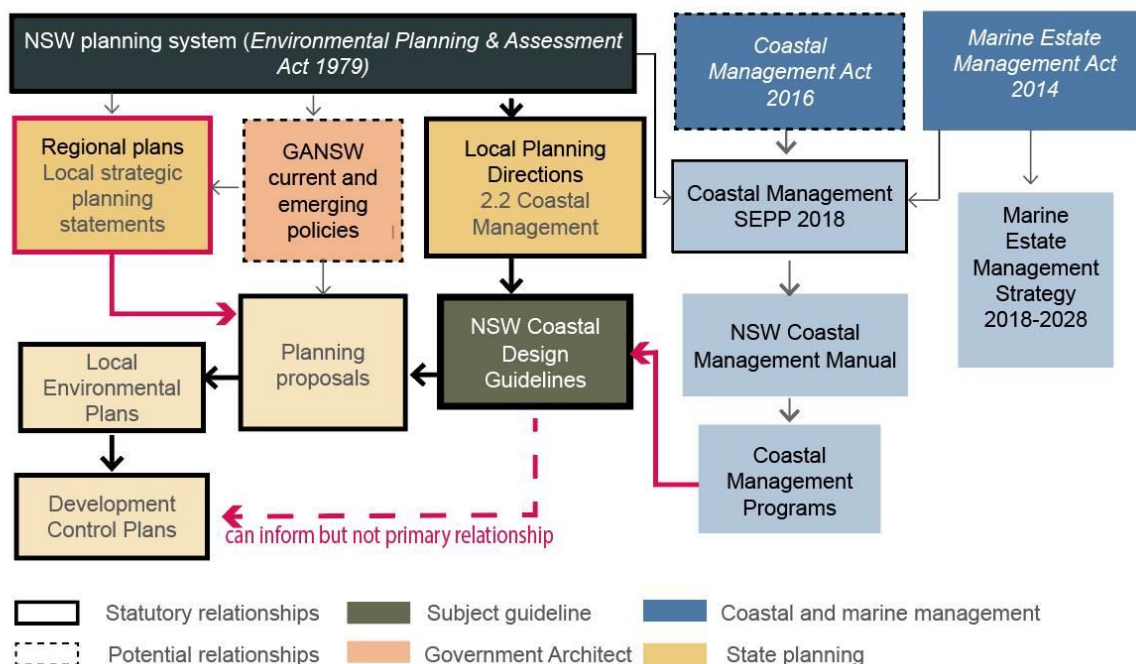
The SCCG believes that there should be a greater linkage between these guidelines and the Coastal Management Framework. It is suggested that the NSW Coastal Management Act, Coastal Management SEPP and subsequent Coastal Management Programs should identify where development is appropriate, what the lifespan those developments are and how these respond to climate projections for the area.

It is recommended that these guidelines identify how best to locate and design development within those already identified areas, to minimise adverse impacts to the surrounding area. Currently, the draft guidelines do not identify where new development should be located.

The SCCG recommends that Figure 2 of the draft guidelines be updated to reflect the relationship more accurately between these documents. Specifically:

- that the 'NSW Coastal Design Guidelines' would sit in the same location, however in addition, the 'Coastal Management Programs' box should link to the 'NSW Coastal Design Guidelines' box instead of the 'Development Control Plan' box. Once a Planning Proposal is prepared that considers both the Coastal Management Program and Coastal Design Guidelines, updates would then be made to both the LEP and DCP. It is crucial however that a Planning Proposal is not based on the NSW Coastal Design Guidelines only, but that the decision to increase any density or development within the coastal zone is influenced by an adopted CMP.
- the box for Regional Plans and Local Strategic Planning Statements should be shown as a statutory relationship, not a potential relationship as it is currently. We are required by the EP&A Act to give effect to the Region Plans and LSPS in the LEP, so it is a statutory relationship.
- that the line between the Regional Plans box and Local Environmental Plan box be removed, and just show the 'Region Plan' box connecting to the 'Planning Proposals' box.

A suggested updated version with the changes shown in red is provided below.



I trust that the information provided above will be helpful in finalising the draft NSW Coastal Design Guidelines prior to exhibition for public consultation.

If you have any queries, please contact me on M.0407733075 or by email at executiveofficer@sydneycoastalcouncils.com.au

Yours sincerely,

Sarah Penny Joyce

Sarah Penny Joyce
Executive Officer