

ITEM 07.24.092 PLANNING PROPOSAL (REZ2023/0005) TO AMEND CLARENCE VALLEY LOCAL ENVIRONMENTAL PLAN 2011 TO PERMIT AN ADDITIONAL PERMITTED USE (HOTEL OR MOTEL ACCOMMODATION) ON PART LOT 11 DP 1269790, 75-79 SPENCER STREET, ILUKA

Meeting	Council	25 June 2024
Directorate	Environment & Planning	
Prepared by	Strategic Planner, Jasmine Oakes	
Reviewed by	Director Environment & Planning, Adam Cameron	
Attachments	A. Planning Proposal - REZ2023-0005 (Separate Cover) ↗	

SUMMARY

This report seeks Council endorsement (as the planning proposal authority) to submit planning proposal REZ2023/0005 (**Attachment A**) to the Department of Planning, Housing and Infrastructure (DPHI) seeking a Gateway determination. The purpose being to amend Schedule 1 Additional Permitted Uses (APU) of the *Clarence Valley Local Environmental 2011* (CVLEP) and APU map, to allow development for the purpose of “hotel or motel accommodation” to be permitted with consent on part Lot 11 DP 1269790, 75-79 Spencer Street, Iluka, consisting of the Iluka Bowling Club (Club Iluka).

Club Iluka management have been in consultation with Council planning staff and have commissioned a Market and Financial Assessment to identify options to strengthen the club’s financial viability into the future. The planning proposal for an APU allowing for “hotel or motel accommodation” to be developed and be managed independent of the club is considered the most viable option for the security of the club into the future.

OFFICER RECOMMENDATION

That Council:

1. endorse planning proposal REZ2023/0005 (**Attachment A**) to amend Schedule 1 of the *Clarence Valley Local Environmental Plan 2011* and Additional Permitted Use map to allow development for the purpose of “hotel or motel accommodation” to be permitted with consent on part Lot 11 DP 1269790;
2. delegate authority to the General Manager to:
 - a. submit the planning proposal to the Department of Planning, Housing and Infrastructure seeking a Gateway determination;
 - b. execute all documentation associated with the local plan making functions, in the event Council is delegated as the local plan-making authority;
 - c. edit and finalise the planning proposal as required.
3. in the event a Gateway determination is issued, publicly exhibit the planning proposal REZ2023/0005 in accordance with Gateway conditions, legislative requirements and Council’s Community Participation Plan;
4. finalise the planning proposal REZ2023/0005 subject to no submissions being received that require further consideration by Council; and
5. note that if any submissions are received that object to or raise concerns over the proposal, this matter will be reported to the next available Council meeting for further consideration after submissions close.

COUNCIL RESOLUTION - 07.24.092

Tiley/Clancy

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Voting recorded as follows

For: Clancy, Day, Johnstone, Novak, Pickering, Smith, Tiley, Toms, Whaites

Against: Nil

CARRIED

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LINKAGE TO OUR COMMUNITY PLAN

Theme Economy

Objective We will have an attractive and diverse environment for business, tourism and industry

KEY ISSUES

Club Iluka management propose to develop “hotel or motel accommodation” on the land consisting of the Club Iluka located on Lot 11 DP 1269790, 75-79 Spencer Street, Iluka to strengthen the club’s financial viability to enable them to continue to provide important social and recreational services to the community, including necessary upgrades to the existing clubhouse facilities.

As defined by the CVLEP:

hotel or motel accommodation means a building or place (whether or not licensed premises under the Liquor Act 2007) that provides temporary or short-term accommodation on a commercial basis and that—

- (a) comprises rooms or self-contained suites, and
- (b) may provide meals to guests or the general public and facilities for the parking of guests' vehicles,

but does not include backpackers' accommodation, a boarding house, bed and breakfast accommodation or farm stay accommodation.

The land is zoned RE2 Private Recreation. Development for the purpose of "hotel or motel accommodation" is prohibited in this zone. Development for the purpose of hotel or motel accommodation however may be considered on the site as ancillary and subordinate to the registered Club, i.e. limited for use by visitors to the club for sporting activities, however a Market and Financial Assessment indicated that a motel as ancillary to the club would not be financially viable.

Consequently, Club Iluka have submitted a planning proposal to amend the CVLEP over the area identified by blue hatching in Figure 1, as follows:

1. Schedule 1 Additional Permitted Uses (APU):

"Use of certain land a No.75-79 Spencer St, Iluka

1. *This clause applies to part of No. 75-79 Spenser St Iluka being part Lot 11 DP 1269790 identified as XX on the Additional Permitted Uses Map.*
2. *Development for the purpose of hotel or motel accommodation is permitted with development consent."*



Figure 1: Proposed APU for "hotel or motel accommodation"

2. *Amend the Height of Building Map, from 'no height limit' to J-9m height, in accordance with the proposed height of building map (Figure 2) area to ensure future development is consistent with the building height of surrounding residential zoned land.*

Note: The RE2 Private Recreation zone does not currently have a height of building control.



Figure 2: Proposed CVLEP Height of Building Map (9 metres)

Strategic and site-specific merit

A planning proposal must be developed in accordance with the LEP Making Guidelines (August 2023) and Division 3.4 of the *Environmental Planning and Assessment Act 1979* and demonstrate strategic and site-specific merit, including consistency with state, regional and local planning policy. The proposal has sought to address the following relevant strategic content:

North Coast Regional Plan 2041 (NCRP)

The planning proposal proponent has assessed the proposal as being consistent with the following relevant NCRP objectives.

- Objective 5: Manage and improve resilience to shocks and stresses, natural hazards and climate change
- Objective 9: Sustainably manage and conserve water resources
- Objective 11: Support cities and centres and coordinate the supply of well-located employment land
- Objective 12: Create a diverse visitor economy
- Objective 20: Celebrate local character.

Section 9.1 Ministerial Directions

The planning proposal proponent assessed the planning proposal as being consistent with the following section 9.1 Ministerial Directions:

- 1.1 Implementation of Regional Plans
- 1.4 Site Specific Provisions
- 4.2 Coastal Management (refer Section 4.7 and Annexure K of the planning proposal)
- 4.3 Planning for Bushfire Protection (refer Section 4.7 and Annexure B of the planning proposal).

The planning proposal proponent assessed the proposal to be inconsistent with the following section 9.1 Ministerial Directions:

- 4.1 Flooding – minor inconsistency (refer below)
- 4.5 Acid Sulfate Soils – Inconsistent but justified as minor significance on the basis that any proposed future development works will not impact more than 2 meters below the natural ground surface and can be managed by a management plan under the development application process.

Flooding

The land is not mapped as flood affected by either the flood planning level or probable maximum flood under the 2013 flood model. Therefore, the planning proposal is consistent with the current Iluka Floodplain Risk Management Plan (FRMP) which was developed in accordance with the principles in the relevant floodplain manual in force at the time.

The Lower Clarence Flood Model 2022 Update (the 2022 flood model) was undertaken to review previous studies considering recent construction of the new Grafton Bridge and Pacific Motorway Upgrade and recent significant flood events. The 2022 flood model indicates that the site is not directly impacted by the 1% AEP Climate Change 1 scenario (RCP 4.5; 2123 Planning Horizon) as the draft Defined Flood Event, however it is mapped as “probable maximum flood” level RL6.9m under the 2022 Flood Model, which would potentially impact the site by approximately 1.5m of flood waters during the most extreme flood event modelled. Refer Figure 3 below.

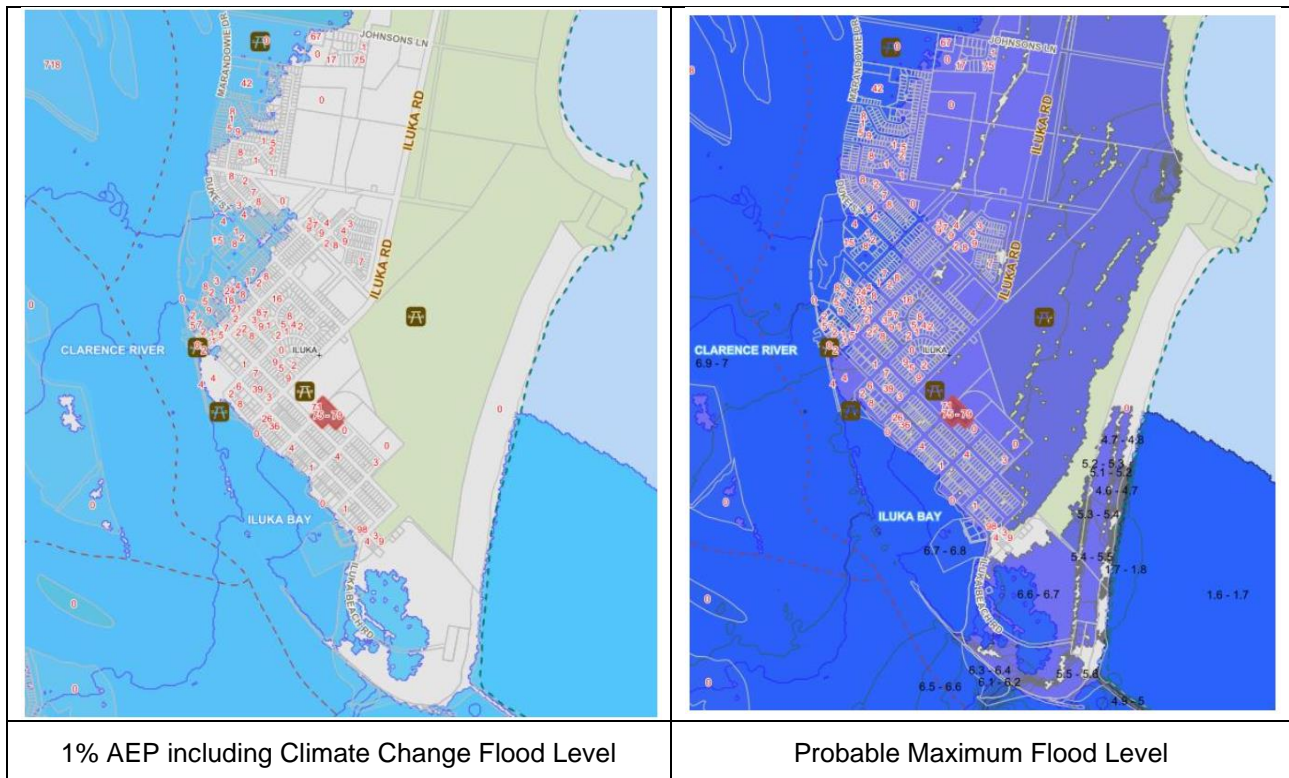


Figure 3. Lower Clarence Flood Model 2022 Update, showing the subject site in red

The NSW SES Clarence Valley Local Flood Emergency Sub Plan, Volume 3 Clarence Valley Flood Warning Systems and Arrangement, February 2024 (the Flood Sub Plan) includes locality response arrangements for the Iluka Sector at Section 7, which indicates that Iluka Road (access road) is cut when flood waters reach 2.1m on the Maclean gauge (204410/558022) approximately a 5% AEP (1 in 20 year) flood event, potentially isolating the coastal village for numerous days, dependant on the flood level. The Flood Sub Plan also provides evacuation triggers for Iluka, with local warnings commencing when there is a prediction for the Maclean gauge to reach/exceed 2.0m, prior to isolation.

Due to the potential for the village to be isolated at a 1 in 20 year flood level, the DPHI required additional flood information and flood risk and evacuation measures to be included to support the planning proposal. The proposal was amended to provide flood behaviour and evacuation details (refer Evacuation Plan at Annexure N of the planning proposal – **Attachment A**) that in the event that a flood warning is issued predicting a 1 in 20 flood event (2.1m on the Maclean gauge), Club Iluka (or relevant management of the motel) will evacuate the motel with enough notice within business hours to enable visitors to make alternate accommodation arrangements outside the flood risk area, prior Iluka Road being cut isolating the village. The motel is then to remain closed to visitors to minimise any potential risk associated with isolation and flooding.

Staff Comment

It is considered that the inconsistency with the Section 9.1 Direction 4.1 Flooding is minor and potential risks to visitors can be effectively managed and the evacuation plan implemented prior to the Iluka Road being cut in the 1 in 20-year flood level. In addition, if and when a DA for 'hotel or motel accommodation' is made over

the land, the DA process will require appropriate resilience and evacuation planning to be addressed to ensure the development does not adversely impact the surrounding properties, safe occupation and evacuation in accordance with the relevant CVLEP, DCP and any other relevant guidance in force at time of application.

State Environmental Planning Policies (SEPPs)

The planning proposal proponent assessed that the only applicable SEPP relevant to this proposal being the SEPP (Resilience & Hazards) 2021, due to the land being in the coastal zone and mapped coastal environment area. The applicant's assessment against this SEPP concluded that the proposal is consistent with the Policy, as it will likely have no impacts in respect to any of the clauses within the Policy (refer Annexure H of the planning proposal – **Attachment A**). The applicant has also undertaken an assessment against the NSW Coastal Design Guidelines (refer Annexure K of the planning proposal – **Attachment A**).

Staff comment

Council is currently undertaking the Coastal Management Program (CMP), in accordance with the *Coastal Management Act 2016*, to assess coastal hazards and risk, including coastal erosion, coastal inundation and climate change impacts. The land has not been identified as directly impacted by coastal hazards, however Iluka Road (access road) has potential to be impacted by coastal erosion and inundation, isolating the village by road. The CMP process will identify and recommend management options to address these hazards to minimise potential for isolation, including potential upgrades to Iluka Road in the vulnerability areas, however the treatment has yet to be determined.

Council's local strategies

The planning proposal aligns and assists in implementing the following Council Strategies/ Plans:

- Local Strategic Planning Statement – *Priority 14 Promote the growth of sustainable tourism*
- Clarence Valley Regional Economic Development Strategy 2023 Update - *Develop a visitor economy that best takes advantage of the Clarence River and the coast, leveraging the region's adventure and nature tourism opportunities.*
- Clarence River Way Masterplan II 2021 - *Establish Grafton, Maclean, Ulmarra, Yamba/Iluka as river towns that are the key tourism service hubs for the Clarence River Way.*

The proposal has also been assessed against the Clarence Valley Employment Land Strategy 2022 and the Clarence Valley Settlement Strategy 1999 in part 4 of the planning proposal, and while these strategies do not address tourism or analyse the need for additional tourism land, the proposal is considered to be consistent with the intent of these strategies.

Consequently, the proposal has been assessed and is consistent with the relevant NCRP objectives, section 9.1 Ministerial directions, SEPPs and Council's local strategies.

Council (as planning proposal authority) must support a planning proposal before it is submitted to the Department for review for Gateway determination.

BACKGROUND

Bowling Clubs in NSW have been decreasing in number due to declining members, gaming legislation reforms and other factors, as indicated by the General Manager of Club Iluka in her letter dated 10 October 2023 (Annexure J of the planning proposal – **Attachment A**). Many bowling clubs have needed to diversify their revenue streams to remain viable, such as investment in accommodation for the tourism market, which is still considered relevant to the hospitality industry.

Club Iluka have been in consultation with Council planning staff over several years regarding permissibility of motel accommodation on the site to assist with economic security for the club. A pre-DA lodgement meeting held in 2020 discussed potential options for motel accommodation given that this land use is prohibited in the RE1 Private Recreation zone under the CVLEP:

- Option 1. A motel on the site that is ancillary and subordinate to the registered club, which would be accessible via the development application process.
- Option 2. A motel on the site which could be managed independent to the club, which would be assessed via the planning proposal process to rezone the land or via an APU over the land to enable permissibility under the CVLEP.
- Option 3. To purchase an existing motel or land zoned where hotel or motel accommodation is permissible under the CVLEP.

Club Iluka submitted a development application (DA2021/0613) in 2021 for a 12-room motel on the land (previously Lot 93 DP 822834) as ancillary to the registered club. The site proposed for the motel within the DA was originally to the rear (north) of the land, behind the current ambulance station. This part of the land is mapped within the bush fire prone land buffer area. The DA was referred to the NSW Rural Fire Service (RFS) as integrated development. The NSW RFS advised that:

“The application is for a new SFPP [Special Fire Protection Purpose] development and is not considered infill, as such, the Consultant is requested to provide an assessment based on the requirements of section 6.8.1 and Table A1.12.1 of ‘Planning for Bush Fire Protection 2019’. Where APZs to achieve radiant heat levels not exceeding 10 kW/m² cannot be achieved, the NSW RFS recommends re-siting of the development”.

Consequently, the development application was withdrawn.

A subsequent Pre-DA Lodgement meeting was held in 2022 to again discuss motel accommodation options at on the Club Iluka land. Council staff advised that should another DA be submitted that an assessment of available accommodation in Iluka be required demonstrating why this accommodation is needed.

Club Iluka commissioned a Market and Financial Assessment (Rand and Associates 2022) to assess motel viability. The assessment indicated that a motel would be financially viable with an occupancy rate of between 65% and 75% annually based on the size of the motel being 20 / 12 rooms respectively. However, this would not be achievable should the motel be exclusive for club patrons.

The option to rezone the site to SP3 Tourist zone was considered in preliminary discussions, however the APU has been progressed as the preferred option so that the use for a hotel or motel accommodation is defined and therefore limited.

Consequently, Club Iluka have opted to undertake the planning proposal process to amend the CVLEP for an additional permitted use to enable hotel or motel accommodation to be developed on the land independently of the registered club.

COUNCIL IMPLICATIONS

Budget/Financial

The applicant has paid the associated fees applicable for a Rezoning Application Pre-Gateway Assessment as detailed within Council’s Annual Fees and Charges 2023/2024. These fees will cover the administration of the planning proposal through to the Department of Planning, Housing and Infrastructure’s Planning Gateway, should Council support the proposal. Further fees will be payable should a Gateway determination be issued to finalise the LEP.

Asset Management

N/A

Policy and Regulation

Environmental Planning and Assessment Act 1979
State Environmental Planning Policies
Section 9.1 Ministerial Directions
Clarence Valley Local Environmental Plan 2011

Consultation

Scoping Proposal

A scoping proposal was referred to the DPHI on 30 January 2023 for preliminary advice on the proposal, preference to either rezone or apply an APU over the land and the requirement for other information to support a planning proposal, should it progress.

A response was received from DPHI’s Manager, Local and Regional Planning, Northern Region on 3 February 2023:

Our preliminary review has identified no major issues that would likely prevent the issue of a positive Gateway determination.

The planning proposal should however ensure that it addresses:

- *Whether a SP3 or a APU approach is the most appropriate. The Department has no firm position on either approach other than requiring any time that an APU is proposed that the proposal clearly addresses why a zoning or land use table change is not suitable in the circumstances and that an APU is the most appropriate mechanism. In this case Council may wish to argue that the range of uses currently permitted in the SP3 zone under CVLEP 2011 is too broad and not appropriate for the particular site (ie. helipads, local distribution centres, residential accommodation)*
- *Whether Council will be seeking to permit the broader 'tourist and visitor accommodation' use or the more narrow 'hotel or motel accommodation' use and why*
- *Bushfire prone land (Referral to the NSW RFS post Gateway will be required)*
- *Whether adequate infrastructure (water, sewage disposal, road, etc) is available to service the development*
- *A complete s9.1 Direction and NCRP 2041 review and assessment*

The Department also supports the proposed consultation with the Yaegl LALC.

The scoping proposal was also referred to NSW Rural Fire Service on 30 January 2023, with advice received on Friday 21 April 2023:

Iluka nature reserve borders the property to the north and east. The nature reserve promotes a significant fire run towards the land and Iluka village.

The NSW RFS has no objection to the LEP Amendment. Future development shall comply with the requirements of Planning for Bush Fire Protection. Any new tourism accommodation development will not be considered as SFPP Infill and will be required to have sufficient setbacks from the bushfire hazard to enable the protection of life and property.

Consequently, the planning proposal progressed with version 1 of the proposal being uploaded to the NSW Planning Portal on 21 August 2023. A preliminary assessment of the proposal identified the need for further supporting information.

An updated planning proposal (version 2) was submitted to Council on 6 September 2023. This version of the proposal was referred to relevant Council staff for comment on 1 November 2023:

- **Coordinator Development Services (17 November 2023)**
 - Recommended that an economic assessment primarily focusing on the viability of the club and availability of 4+ star accommodation in the valley that demonstrates that the current supply of tourist and visitor accommodation in Iluka (including Woody Head) is not suitable or that there are no or negligible impacts on existing tourist accommodation options.
- **Development Engineer (17 November 2023)**
 - Provided information that had previously been discussed as part of pre-lodgement meetings, outlining relevant requirements that a future Development Application would need to demonstrate.
 - The level of information provided with the Planning Proposal is sufficient at this stage, with further information required at DA stage to demonstrate suitability of the development.
- **Environmental Service (Trade Waste)**
 - I have reviewed the information from a trade waste perspective and advise that I have no concerns/requirements with this proposal.

The Market and Financial Assessment (Rand and Associates 2022) has been provided as a confidential document to support the planning proposal. Therefore, there was no further requirement for additional information from relevant staff to be included to support the planning proposal.

Council at their meeting held 26 September 2023 adopted the Lower Clarence Flood Model 2022 Update and Flood Planning Levels (07.23.159). This new flood model maps the land as potentially impacted by a "probable maximum" flood'. The land was not mapped as flood prone under the previous 2013 Flood Model. Consequently, further discussions ensued with the DPHI regarding flood behaviour, flood risk and evacuation requirements for the site, resulting in the planning proposal being amended further to provide supporting detail as recommended by DPHI (version 4 & 5).

The planning proposal will be required to be publicly exhibited and referral required to relevant government agencies and authorities in the event a Gateway Determination is issued for the proposal.

Legal and Risk Management

A decision to support this proposal being sent to DPHI for a Gateway determination is a normal part of the planning process. Council endorsement at this stage does not preclude Council reaching an informed decision to approve or refuse the planning proposal at future steps, particularly based on community feedback and detailed considerations. Further, a future DA for 'hotel or motel accommodation' will need to be submitted if the planning proposal is supported and finalised.

The applicant has a right to request a review of Council's decision, should Council refuse to support the proposal, after Council advises of this in writing. There is no right of appeal to the Land and Environment Court.

In terms of flood risk, the land has been mapped as potentially impacted by a "probable maximum flood" level of RL6.9m under the Lower Clarence Flood Model 2022 Update, as detailed in the Key Issues section of this report. Consequently, any rezoning for an APU allowing hotel or motel accommodation on the land need to consider the potential risk to both the owners and guests and also liability of Council. Were Council to support the planning proposal, it needs to consider its statutory immunity risks.

Section 733(1)(b) of the *Local Government Act, 1993* indicates that Council does not incur any liability in respect of:

anything done or omitted to be done in good faith by the council in so far as it relates to the likelihood of land being flooded or the nature or extent of any such flooding.

Section 733(3)(a) indicates section 733(1) applies to:

the preparation or making of an environmental planning instrument, including a planning proposal for the proposed environmental planning instrument, or a development control plan, or the granting or refusal of consent to a development application, or the determination of an application for a complying development certificate, under the Environmental Planning and Assessment Act 1979.

Section 733(4) outlines how "good faith" can be demonstrated:

(4) Without limiting any other circumstances in which a council may have acted in good faith, a council is, unless the contrary is proved, taken to have acted in good faith for the purposes of this section if the advice was furnished, or the thing was done or omitted to be done—

(a) substantially in accordance with the principles contained in the relevant manual most recently notified under subsection (5) at that time.

The planning proposal is consistent with the current Iluka Floodplain Risk Management Plan (FRMP) which was developed in accordance with the principles in the relevant floodplain manual in force at the time, being that the land was not previously mapped flood prone.

Council is currently commencing a new Flood Risk Management Study and Plan based on the 2022 Flood Model and NSW Government's updated Flood Risk Management Manual and Flood Prone Land Policy Package, released on 30 June 2023, which will provide updated advice regarding the management of flood risk.

Climate Change

There will not be any additional Council maintained assets that could be affected by climate change impacts as listed in Council's Disaster Resilience Framework.

The proposal has included considerations of flood calculations under the Lower Clarence Flood Model 2022 Update which also includes potential impacts of climate change.

The proposal has also considered potential climate change impacts associated with coastal hazards under the SEPP (Resilience and Hazards) 2021 at Annexure H and the NSW Coastal Design Guideline Checklist at Annexure K of the planning proposal. Council is currently preparing a CMP under the *Coastal Management Act 2016* which will propose a number of management options for any coastal risk areas, including Iluka Road (access road) which is identified as vulnerable to coastal erosion and inundation, to reduce potential for isolation.