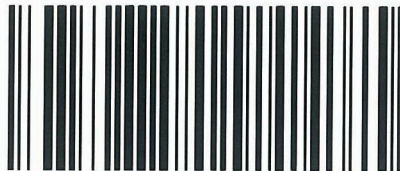


25 February 2014.



PCU51633

To: Ms Santina Camroux,

From: Mr D.F. Whitnall  
Avoca Beach  
NSW 2251

Coastal & Natural Resources Branch,  
NSW Department of Planning & Infrastructure  
GPO Box 39 Sydney NSW 2001.

Subject: Advice on coastal hazards-Draft planning circular

Dear Ms Camroux, As a beach front owner, I note with some concern aspects of the draft planning circular appear vague. I would respectfully like to offer some of my thoughts in my submission.

1. In relation to sea level rise, the source of the data is unclear. I submit that the state government should make a clear directive to councils to use the latest science based local data, not based on projections and models such as the 2007 IPCC report. These findings with others were found to be inadequate by the chief scientist Professor Mary O'Kane. Latest research shows a global average over past 110 years to be 1.7mm. Local data compares closely. This is far less than the 0.9 m already adopted by some councils. I believe this issue is not unclear as numerous sources give clear evidence of sea level rise in our region. Projections which councils favor are nothing more than assumptions about future trends if they actually occur.
2. The 0.9m sea level rise adopted by some councils has been used to create Hazard lines. These lines have contributed to loss of property values, planned retreat, time limited development consent and anxiety. These hazard lines I suggest do not represent evidence, at best they are speculative, pessimistic conjectures based on flawed information and particularly an invalid rule (The Bruun Rule). The 100 year projections are speculative but are viewed by most as predictions. I believe it is irresponsible for councils to present 100 year projections as reliable as a 50 year projection. This whole exercise of hazard lines with flimsy evidence has adverse effects on policy decisions and property values.
3. Some councils excuse their use of hazard lines as a precautionary principle. I respectfully observe that the precautionary approach they rely on has no standing in professional risk analysis literature as reviewed by the OECD in 2010. It violates the basic principle of logic of decision making under uncertainty. It disregards the opportunity cost of precautionary measures; it fails to take the potential benefits as well as potential losses into consideration and it greatly complicates the setting of regulatory priorities. Precautionary approaches only consider the worst possible case disregarding probabilities. The precautionary approach is not a scientific approach to uncertainty. Nor does it give guidance as to what should be done due to lack of adequate evidence, nor does it make authorities competent to determine which direction a projected shore should be moved, to account for risk.

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These lines in my opinion should be reassessed by some councils to adapt to sensible levels in line with observed and historical accretion or recession. Risk from mainly storm events can be reduced by adaptive works and risk sharing.

There are some other areas in the circular which are open to numerous interpretations.

Firstly: The policies derived from this circular are dependent on the minister's section 117 directives. They have not been published in this circular.

Secondly: Suggesting that councils place futuristic information on planning certificates before a comprehensive process of consultation could induce councils (In my case Gosford council) to reintroduce policies that further destroy property values and sea level rise encodings.

Thirdly: There was no mention of the very contentious issue of planned retreat and time limited development which are the largest contributors to loss of property values and foremost stress on those affected.

Fourth: " Barriers to effective climate change ". Those of us who are fortunate to own property have some responsibility to contribute to the protection of the foreshore however we punch well above our weight in rates. Why should the burden be solely placed on those affected when the foreshore and beaches are used by all.

May I suggest a portion of our large rate payments could contribute to a disaster fund that helps councils address problems that arise from large storm events and also help with funds to protect exposed areas.

I thank the government for allowing me the opportunity to place a submission on these issues.

Yours Sincerely



D.F. WHITNALL.

- ☒ I am making a personal submission ✓  
☐ I am submitting my organisation's submission

**Name: \***

Title

Mr

First Name DENIS

Last Name WHITNALL

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#### 4. Agree to the following statements

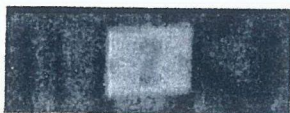
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