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Director Environment & Building Policy
NSW Dept. of Planning & Environment
GPO Box 39
Sydney NSW 2001

Dear Director

**State Environment Planning Policy (Coastal Management) 2016 – Submission
re Draft SEPP**

As the owner of a beachfront property which fronts Boomerang Beach I wish to make a submission for consideration. I am doing so as one individual owner and Chair of the Executive Committee of the Body Corporate of a complex of 28 Units. My views are shared by many of the other owners in the complex. I am also a member of Boomerang & Blueys Residents Group Inc (BBRG) which has been leading our campaign of review to both GLC LEP 2014 and the draft Coastal SEPP over what has been an extended period.

For simplicity, my submission which follows is presented in dot point form.

1. Main submission requests

- 1.1 That the discriminatory and unsubstantiated Boomerang & Blueys (B & B) coastal risk planning map in GLC LEP 2014 and B& B vulnerability area map in draft Coastal SEPP be removed
- 1.2 That the Draft SEPP Clause 13 be amended to include a hierarchy of risks to improve the practical application of this clause
- 1.3 That the Draft SEPP Clause 13.3 be amended to delete temporary buildings provisions.

2. Justification for main submission requests

- 2.1 Worley Parsons (WP) 2011 study was desk top and only part of the process – adopted and gazetted in GLC LEP 2014 without due recognition of proven report shortcomings or limiting qualifications.
- 2.2 BBRG peer reviews since 2011 by Professor Andrew Short, Angus Jackson and Angus Gordon. B & B are embayed beaches between large rock headlands backed by high dunes that are accreting – supported by photogrammetry over 60 years – see next point 2.3
- 2.3 No record of any real threats – dunes stable as confirmed by OEH (NSW Office of Environment & Heritage) photogrammetry 1956 to 2013
- 2.4 Impact on coastal development potential with no compensation– see also 2.5 below
- 2.5 B&B property values have lost \$100m+ since 2011 – due to GFC plus beach concerns and uncertainty – my personal paper loss to date is approx. \$250k or 40%
- 2.6 Discriminatory and unfair impact on individual coastal property rights
- 2.7 Contrary to the requirement of draft SEPP Clause 4 (2), which requires evidence based maps- the B&B map is not evidence based – proposals are unreasonable and cannot be justified

3. Specific additional questions

- 3.1 Why are B&B maps in LEP 2014 and draft Coastal SEPP – what have been the criteria for inclusion and have these criteria been applied consistently in respect of all the beaches in NSW?
- 3.2 What process is to be adopted to ensure all maps are accurate before SEPP is adopted?
- 3.3 In finalising the SEPP will the professional qualifications and veracity of providers of all relevant reports be checked?

4. Conclusion

The above submission is based on a layman's experience of developments in this process – particularly that involving the compilation of GLC LEP14.

I cannot understand the rejection of LEP14 by the State Government, only to be followed by the part inclusion of this rejected LEP in the now drafted SEPP.

The inconsistencies of including B&B in affected beaches whilst not including proven problem beaches like Jimmy's and Old Bar Beaches, and even some Sydney Beaches, seem unjustified and grossly unfair to B&B (and perhaps other NSW property) owners.

Notwithstanding the present position with the SEPP we are already suffering the impacts of restrictions in use of our properties, coupled with significant financial losses.

I feel sure this was never the intention of the State Government that coastal management would be applied in an ad hoc fashion, rather than being promulgated in an even handed, professionally advised and equitable fashion.

For your due consideration please. If your officers need to contact me my home address and contact details are as follows;

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Yours sincerely

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