

Emma Vlatko

From: MF <[REDACTED]>
Sent: Friday, 13 January 2017 9:01 AM
To: DPE PS coastal Mailbox
Subject: Draft Coastal SEPP submission

The Manager

As residents of Boomerang Beach on the NSW mid north coast for over 25 years - we object to the inclusion of Boomerang and Blueys beaches as vulnerability areas in the draft coastal SEPP.

This submission relates to our participation in a meeting with Minister Stokes and colleagues on 10 January - and we are members of and support the actions are recommendations of the BBRG (Boomerang & Blueys Residents Group Inc) and the NCA (NSW Coastal Alliance Inc).

We have reviewed the relevant documents and provide the following comments, requests and recommendations.

We request modification of draft SEPP clause 4 (2) to require evidence based maps - rather than current unqualified inclusion of existing LEP and DCP mapping.

We request removal of the Boomerang and Blueys (B&B) coastal vulnerability area map in the draft SEPP for reasons including

- * the maps are based on a partial desk top study prepared by Worley Parsons (WP) in 2011
- * WP state that the study was not adequate for planning or legislation purposes
- * peer reviews by Professor Andrew Short (2012), Angus Jackson (2015 & 2016) and Angus Gordon (2014 to date) confirm that B&B are stable, accreting and embayed beaches between substantial rock headlands
- * OEH photogrammetry 1953 to date confirms ongoing stability of the existing rock based B&B dune system
- * major storms since the 1970s exposed beach areas of rock substrata but did not adversely impact on the B&B dune system. Beach sand returned naturally after each storm with continuing accretion

We recommend inclusion of a Planning Policy, within or associated with the draft SEPP, based on a hierarchy of coastal risks. This Policy should initially review designated coastal 'hot spots' and then provide a framework for available funds to be allocated to actual required priority works rather than further unnecessary and duplicate studies.

We object to draft SEPP clauses 13.2 and 13.3 and request review of the temporary housing provisions and inclusion of the above recommended hierarchy of risks.

We recommend inclusion of comprehensive social and economic impact commentary and criteria in the draft SEPP.

Regards

Michael Fox & family

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Pacific Palms NSW 2428 [REDACTED] [REDACTED]

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