

Boomerang & Blueys Residents Group Inc.

20 January 2017

The Director
Environment & Building Policy
GPO Box 39
SYDNEY NSW 2001

Dear Sir / Madam

Coastal Reforms – draft coastal SEPP

Our Group represents over 100 coastal residents and property owners at Boomerang and Blueys (B & B) beaches in the Mid Coast Council (MCC) area. BBRG is a member of the NCA and shares statewide NCA coastal concerns.

We object to the draft SEPP and inclusion of B & B in GLC LEP 2014 and the vulnerability area map in the draft Coastal SEPP, for reasons including

- ❖ The mapping is based on a Worley Parsons (WP) 2011 study that was a desk top assessment – considered by WP to be inadequate for planning purposes
- ❖ The flawed B & B map was adopted in GLC LEP 2014
- ❖ BBRG peer reviews since 2011 include Professor Andrew Short and Angus Jackson – and the consensus is that B & B are embayed beaches between large rock headlands backed by high dunes that are accreting
- ❖ There is no record of any real B & B threats – and dune stability is confirmed by OEH photogrammetry 1956 to 2013
- ❖ B&B property values have lost over \$100m since 2011 – due to a significant extent to uncertainty and concerns about the implied coastal threat to the beaches and community
- ❖ Angus Gordon, former Coastal Panel Chair, advised BBRG in December 2014 that ... *the WP report was an insufficient basis to proceed directly to Stage 6 from Stage 2... the two beaches have historically experienced on-going accretion.*

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Accordingly our concerns and requests include

- ❖ The B & B maps are not evidence based – and proposals cannot be justified
- ❖ Amend SEPP Clause 4 (2) – to require evidence based maps
- ❖ Remove discriminatory and unsubstantiated Boomerang & Blueys (B & B) coastal risk planning map in GLC LEP 2014 and attached B& B vulnerability area map in draft Coastal SEPP
- ❖ Prepare & gazette a Planning Policy for government funds to be allocated on a coastal risk hierarchy basis – ie actual MCC works required at Old Bar and Winda Woppa rather than more unnecessary B & B studies
- ❖ Amend SEPP Clause 13.2 & 13.3 – to delete / modify ambulatory boundaries and temporary housing provisions by including a hierarchy of risks
- ❖ The SEPP should incorporate comprehensive social and economic criteria
- ❖ The B & B maps are discriminatory as B & B are not designated hot spots and many other MCC areas with higher risks are excluded from the SEPP – including Tiona, One Mile Beach and Wallis Lake frontages

The conclusion from all this evidence is that an error has been made by the Minister's predecessor in gazetting the hazard maps for Boomerang and Blueys in the LEP 2014 GLC (File number 3320_COM_CRA_040_20140117).

Therefore BBRG considers it is the Minister's responsibility to correct this error by removing the B & B maps from the draft SEPP and LEP 2014 – and ensuring that the unsubstantiated B & B maps and onerous provisions are removed from the revised draft MCC CZMP currently under assessment by the Minister.

Regards

Boomerang & Blueys Residents Group Inc.



MICHAEL FOX AM

President

Representing 75+ Boomerang & Blueys property owners

Boomerang & Blueys Residents Group Inc.



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