Steven James and Amanda Elizabeth Howe

Blueys Beach NSW 2428

18/1/2017

To: coastal@planning.nsw.gov.au

Dear sir/madam,

Ref: Draft Coastal SEPP submissions.

We are the owners of 62 Newman Ave Blueys Beach within the Pacific Palms enclave and provide this submission and comment in relation to the Blueys and Boomerang Beaches within the draft SEPP and LEP 2014 Coastal Management Plan.

We request the <u>removal</u> of Blueys and Boomerang Beaches from the coastal risk planning map (hazard map) (File number 3320_COM_CRA_040_20140117) from both the SEPP and the LEP 2014 for the Great Lakes Council (now Mid Coast Council).

We strongly believe that the Hazard Map is fundamentally flawed and <u>not</u> evidence based.

Both Blueys Beach and Boomerang Beach are stable beaches and photogrammetric evidence since 1956 ie over the last 60 years adequately demonstrates this despite the major storms that impacted upon the coast during this time.

The beaches are embayment beaches protected by large rock headlands providing restorative capacity for the beaches meaning they are both sand accreting and stable. These were the findings of recent coastal engineering studies (Angus Gordon, Angus Jackson and Professor Short) on these two beaches.

Early reports by Worley Parsons in 2011 omitted these facts from their conclusions, however recognised their existence.

We believe therefore the SEPP and the LEP 2014 and the draft Hazard Maps within and that relate to Blueys and Boomerang, are inadequate for planning.

The draft erroneous Hazard Maps in the LEP 2014 and now perpetuated in the SEPP, have resulted in depressed economic activity and a resultant decreasing of land values as residents have been unable to improve their properties given the uncertainty created by the draft CZMP. This is unfair on the residents.

Long term residents have always recognised the stability of both these beaches. This belief is now backed by scientific and engineering studies by eminently qualified professionals.

Recent attempts by Council to classify these beaches as unstable by adopting a flawed engineering report from 2011 which made incorrect assumptions and ignored the available historical evidence, highlight a blind adherence to a disproven ideology irrespective of the facts. One size doesn't fit all.

We also request the removal of the ambulant boundary and temporary/removable building provisions as they relate to Blueys and Boomerang Beaches in the Draft SEPP clauses 13.2 and 13.3.

It is not fair on foreshore residents to wear the unfounded severe restrictions and the resultant economic fallout.

Thank you for this opportunity.

Yours faithfully,

Steve and Amanda Howe

Blueys Beach NSW 2428 18/1/2017