

From: Steven Papadopoulos <[REDACTED]>
Sent: Friday, 13 January 2017 11:45 AM
To: DPE PS coastal Mailbox
Subject: NSW Coastal Policy and Draft SEPP

The Manager

As residents of Blueys Beach on the mid north coast of NSW for over 16 years we object to the inclusion of the Boomerang and Blueys Beaches as vulnerability areas in the draft coastal SEPP.

This submission relates to arguments tabled in a lengthy meeting with Minister Stokes and representatives of OEH and Dept of Planning on 10 January 2017.

I have reviewed relevant documents and provide the following comments and requests:

- the modification of draft SEPP clause 4 (2) to require evidence based maps - rather than automatic inclusion of LEP maps prepared by ill formed instructions to consultants and based on unqualified and unsupported facts or evidence. This position is also supported by the Minister and the panel of experts on the NSW Coastal Panel
- removal of the Blueys and Boomerang Beaches map as these two beaches are not vulnerable areas or at high risk of coastal recession. These maps were:
 - initially undertaken by a desktop study of Worley Parsons and erroneously adopted by Council and OEH resulting in their inclusion in the LEP 2014 - there is now ample evidence to correct the previous errors made by Council in 2014.
 - did not follow the proper process of preparing and gazettal of LEP's
 - discriminatory in being undertaken in a low risk area without any justification at all
 - all consultants including OEH now agree these 2 beaches are stable and accretive
 - mid 2016 storms (classified as 1:100) caused no damage to these beaches
 - there is photogrammetric evidence dating back to 1953 that has been ignored
- there is no consistency in the way the coast line is assessed from Council to Council e.g. there should be a consistent approach in NSW to future sea level rise predictions as the variance from 0.25m to 1.0m can cause enormous variances and conclusions. Councils are presently adopting different assumptions for different beaches in their own jurisdictions - consistent and informed instructions are required to be able to properly compare the risks of coastal erosion and recession across NSW's coastline. This consistent approach has been adopted throughout Qld.
- NSW Government needs to classify risks based on the same assumptions and through a consistent approach across the entire coastline. This consistent approach can then allow a proper assessment of relative risks of each beach in NSW and eliminate the current gross inconsistencies evidenced at Boomerang and Blueys Beaches.
- Clauses 13.2 and 13.3 require further review and inclusion of a the consideration of consistency of assumptions and treatment referred above.
- the 2014 LEP at Blueys and Boomerang beaches and the Draft SEPP have little or no consideration for the punitive economic, financial and social effects on communities in regional areas. The 2014 LEP at Blueys and Boomerang Beaches has had a significant punitive impact on the local communities where uncertainty and a lack of confidence has significantly impacted land owners and local businesses. These planning instruments should consider these impacts before they are adopted rather than ignoring community consultation as has been evidence by the local community at Blueys and Boomerang Beaches - zero communication from local Council and OEH even to the point where evidence and professional experts reports have been ignored.

Thank You

Steven and Melita Papadopoulos
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