
From: Kerrylee Rogers
Sent: 24/04/2022 4:17:40 PM
To: Council Northernbeaches Mailbox
Subject: DA2021/1612 - 1 Clarke Street NARRABEEN NSW 2101

Dear Northern Beaches Council (Re: Daniel Milliken)

I am writing to express my concerns for DA2021/1612.

This DA, and earlier related DA's, do not align with the objectives of the Coastal Management Act of NSW. Specifically, the objects of this act is to manage the coastal environment of NSW with the principles of ecologically sustainable develop for the social, cultural and economic well being of the people of the state. The DA constitutes a development that is poorly designed and does not meet the design requirements to sufficiently protect the beach from erosion or to preserve public access, amenity and use. It is well established in scientific literature and best practice amongst industry to avoid vertical walls for coastal adaptation, and design changes are urgently needed for this DA and earlier works. The DA also does not recognise that beach sustainability can be facilitated, even in the context of sea-level rise, and will continue to provide social, economic and cultural benefits. Vertical walls, and poorly designed adaptation actions, will serve as a short-term defence against storm based erosion, but will not accommodate the natural processes pf beach roll back that will be inevitable by the end of the 21st century based on current trajectories of climate change abatement.

Most concerning, the current focus on a vertical wall favours the protection of private assets (homes and land) at the expense of public assets (i.e. the beach and all the ecosystem services it provides). This approach is contrary to the social, cultural and economic benefits identified in the act and only seeks to appease the concerns of a handful of landholders. In addition, I am not convinced that public participation in coastal management and planning (i.e. object k in NSW Coastal Management Act) has been sufficiently undertaken by council. An appropriate level of communication would ensure that all residents of Sydney who value Narrabeen Beach were aware of the implications of this DA (and others) for long-term beach amenity and access. Furthermore, the precedent that this DA will establish if approved, and similar earlier DA's, will be (and probably already is) damaging for coastal management across NSW and Australia more broadly. It is contrary to object l) of the act, namely to facilitate the identification of land in the coastal zone for acquisition by public or local authorities in order to promote the protection, enhancement, maintenance and restoration of the environment of the coastal zone (Surely a heavily used beach like Narrabeen provides plentiful ecosystem services and public amenity to offset costs associated with loss of the beach arising from poorly designed coastal defences that serve to protect property only). Further resources should be allocated towards different options and the ensuing outcomes for public assets should be sufficiently accounted for when considering design options.

In summary, the DA fails to meet the following objectives of the Coastal management Act:

- (a) to protect and enhance natural coastal processes and coastal environmental values including natural character, scenic value, biological diversity and ecosystem integrity and resilience, and
- (b) to support the social and cultural values of the coastal zone and maintain public access, amenity, use and safety, and
- (c) to acknowledge Aboriginal peoples' spiritual, social, customary and economic use of the coastal zone, and
- (d) to recognise the coastal zone as a vital economic zone and to support sustainable coastal economies, and
- (e) to facilitate ecologically sustainable development in the coastal zone and promote sustainable land use planning decision-making, and
- (f) to mitigate current and future risks from coastal hazards, taking into account the effects of climate change

Kind regards

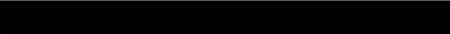
Kerrylee

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