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06/10/2021

MR Brendan Donohoe
35 Ramsay Street Ramsay ST
Collaroy NSW 2097



RE: DA2021/1612 - 1 Clarke Street NARRABEEN NSW 2101

RE: COLLAROY/NARRABEEN SEAWALL

Surfrider Foundation Australia Northern Beaches Branch (Surfrider) is calling on Council to immediately suspend the consideration of any further Development Applications (DAs) for seawalls along the Collaroy/Narrabeen Beachfront as we believe strongly that much of the development to date does not comply with the provisions of Coastal Management Act 2016.

Construction to date between Stuart and Wetherill Streets continuing north to Clarke Street involves the development of vertical concrete seawalls that have historically been proven to be far more damaging to beach processes than alternative coastal armouring methods such as rock revetment walls. (Refer - Corps of Engineers US army publications over more than a 50 year period)

It is Surfrider's considered view that the vertical walls constructed to date would not have been acceptable to the broader community had any significant attempt to engage the community been undertaken.

In 2002 November an estimated 3000 people lined the beach from Devitt Street south to Collaroy SLSC to protest the development of a seawall!

Surfrider considers that there has been insignificant disclosure and contact with the community about the proposals for the current vertical seawalls.

It has only recently learnt of this. We are unsure whether electronic notification of applications and developments are only sent to people who have lodged an interest in one matter and are therefore on a data register or whether notification is given to all ratepayers whose email address Council has after all, all the community who use the beach are without doubt "neighbours" with a specific interest in matters that may affect the community's beach. The fact that the Manly Daily paper is no longer published further prevents ratepayers and users of the beach being informed about the development. Likewise the covid restrictions and restrictions on movement of people and even less use of the beach in winter has meant that, to our knowledge, most people do not know what has been approved and what is currently under consideration and may be approved in the future. In our view they would be shocked to see the vertical walls constructed and, not a sloping revetment wall, similar to a more natural sloping sand dune or bank up from the beach, as was the implication in the Coastal Zone Management Plan (CZMP) for Collaroy.

Whilst views may differ as to the extent the vertical walls may be under sand at times, under legislation, Council is required to be satisfied that the approved development will not unreasonably limit public access along the beach and the use of the beach. Council is also required to be satisfied that the proposal will not have an adverse impact on overshadowing, visual amenity and safe access along the beach for the life of the works. Surfrider, on behalf of users of the beach, requests Council to provide the evidence as to how it satisfied itself of these matters and therefore adequately complied with both the Coastal Act and the Coastal State Environmental Planning Policy (SEPP) (see attached requirements of the Act)

Surfrider wants the public informed of what is proposed to be able to review the approval process and for Council to be transparent so that the beach is not permanently detrimentally affected by new approvals. It is Surfrider's considered view that a major sand nourishment project must now be urgently undertaken to help mitigate the damaging effects of the recently constructed seawalls in order to restore a viable beach for community use. Further, the extension of similarly designed vertical walls to the north of Clarke Street should be reconsidered as a matter of urgency with a view to designing rock revetment walls that have been proved to have a less negative impact on beach erosion than the far more reflective vertical walls.

Surfrider calls on the Council to release to the public any information that has satisfied those within Council who approved the beachfront DAs that the design was compliant with State legislation and Planning instruments as they stand.

Comparisons of the new design being "an improvement on the current state of the protective measures" are nonsensical and inappropriate from Surfrider's point of view as the beach is littered with unauthorised historical works that have no standing making any comparison a totally false equivalent.

The problems of erosion along Collaroy Narrabeen Beach have a long history and have been very well documented. Millions of publicly funded dollars have been spent (and will continue to be spent) in the study and attempts to mitigate these problems.

That Council did not involve the public in the potential design solutions developed over the last couple of years beggars belief as it would appear the current construction is a long way from what the Act, the SEPP the CZMP or the community would expect and accept.

Yours sincerely,

Brendan Donohoe President,

Surfrider Foundation Australia Northern Beaches Branch M: 