

G & M Hooper
69 Main Street
Wooli, NSW 2462

21st October 2010

Councillor R. Williamson
Mayor
Clarence Valley Council

By email: richie.williamson@clarence.nsw.gov.au

Dear Mr. Williamson

SUBMISSION
Re Wooli Village and Coastal Zone Draft Management Plan

There are a number of remedial options, solutions and alternative approaches, and economic considerations, which make the assumptions and conclusions on which the CVC Draft Wooli Village and Coastline Management Plan is based unrealistic, narrow in focus and skewed to a pre-conceived set of assumptions and resulting chain of conclusions. From both the perspectives of CVC best interest and financial outcome, and of the Wooli Village and residents, the draft plan reaches conclusions and makes recommendations premature and needlessly destructive to both Wooli and the CVC.

Viable and practical remedial options for defending and rehabilitating dunes and foreshores exist and have been implemented successfully in Australia, North America and Europe, a few examples of which are referred to below. There are also compelling economic and financial reasons for adopting a policy of dune defence and conservation.

There are over 200 residences on the spit including 87 dwellings on the 'terrace' east of Main Street (excluding the Council Caravan Park) with a combined capital value of well over \$100 million. For a detailed and highly professional analysis of cost versus benefit breakdown of the planned retreat versus a policy of rehabilitation see "Submission to Clarence Valley Council Re Wooli Village Draft Coastline Management Plan" submitted by Roger Goldsmith, CPA, B Ec, M Admin, F Fin and his wife Jan who is also a Graduate in economics. Steve Amundsen, a resident of Wooli and Partner of a major law firm, has valued development within the village conservatively at \$500million – Ref Mr. Amundsen's Submission as submitted to all CVC Councillors and Scott Lenton.

At the bottom line, including the certainty of a class-action lawsuit being launched by Wooli home owners if a policy of retreat as advocated in the draft CVC Plan were to be adopted, the quantifiable cost to Council would be many times greater than adopting a policy of defence; the legal and contingent liability to CVC of a class-action is higher still in light of recent reforms in the NSW class-action regime being enacted today which make it more attractive to litigation and which allow the Supreme Court to award larger damages (ref Australian Financial Review, 21st October 2010).

Coastline conservation and defence has been carried out successfully in many parts of the world for centuries; in recent decades new dunes have been created and vegetated successfully to extend and protect at risk foreshores (e.g. Florida and New England in the US and in Europe). There are numerous examples of coastal defence and regeneration in Europe and North America but also in Australia.

Three Australian examples:

- 1) Gold Coast 40 years ago: Beach had eroded due to storm and man-made interventions with some buildings lost to wave action and many others threatened; remedial work was initiated that included a rock wall and beach hardening; today all the rocks have been covered by sand and the beach has extended and stabilised, protecting and enhancing real estate valued in \$billions.
- 2) Narrabeen, Sydney, 10 years ago: Beach had eroded with the loss of several houses and many more threatened when remedial action was initiated; part of this included caging rocks in steel framework and putting on beach between built up areas and wave line to stop wave surges; result was that this stopped erosion and new sand was trapped so that today the coastline is much wider and stable and these rocks have become buried under the sand and new beach that has formed.
- 3) A local and therefore great example is the current **Wooli School Dune Care Programme**: In front of the school and Firth Lane the children of Wooli School have undertaken a project which has successfully restored, re-invigorated and strengthened the dune and foreshore; the question asked at the community meeting in the Wooli Hall on 16 October 2010 was, “if kindly kids can regenerate the dune and foreshore, why can’t the Council?”
- 4) An overseas example is California 60 years ago, circa 1950: The small settlements of Surfside and Sunset Beach which lie immediately south of Seal Beach in Orange County experienced storm surges and beach erosion resulting in many houses being destroyed; these communities and Orange County commenced remedial action, a major part of which involved dredging sand from a nearby silted up tidal river and depositing it on the spit on which Surfside and Sunset are located; they also constructed a couple of rock walls to modify sand eroding currents set in motion by ill designed previously constructed rock walls; since that time there has been no further threat to coastline or property; this area is now stable and one of the most valuable property locations in the world.

One of the most confusing and seemingly illogical aspects of the CVC draft plan is the proposal to relocate people and dwellings from the highest part of Wooli – the spit – to lower areas on the west side of the spit and also to the north of the spit which is swampy and prone to flooding. A logical train of thought dictates investigating the most practical and cost effective solutions to a Wooli

Village Coastal Management Plan, seeking an approach that pursues its course of action from the perspective of what is in the best interests and that can achieve the best possible outcomes for Woolli residents and the CVC

The Worley Parsons report, while long on verbiage, contains very little new data and refers to a photogrammetric survey which to my knowledge has never been made public; their approach seems predicated on supporting a predetermined outcome and a policy of retreat with little consideration of defensive or remedial options despite the fact that there are numerous examples available simply by doing an internet search. The statement in the report and repeated by Mr. Lenton that a Council employee had measured the distance between some dwellings and the dune with a tape measure certainly does not stack up as scientific approach. Are either Mr. Lenton or the Council aware of the history of storm damage, erosion and renewal of the Woolli beach and dune over the past 100 years, i.e. that in 1908, after a major storm and corresponding king tide, the dune leading edge was closer to buildings than today but regenerated; and again in 1950 and 1995 the same occurred, involving both the cycles of destruction and renewal....and in those instances with little or no rehabilitation measures, support or management plan.

There are omissions or inclusions of patently false statements and a lack of whole-focus scientific investigation and analysis in the report and in the approach taken by Worley Parsons. For example, they mention a 1985 Department of Mineral Resources reference about sand moving along the beach but don't stipulate in which direction or whether the volume of moving sand is constant or variable during differing times of the year; they make bold statements that sand is disappearing but don't say where it is going or support such statements with anything remotely approaching scientific rigour. They have not addressed the issue of the break-walls constructed at the mouth of the Woolli River in 1974 and its effect on currents and resultant sand flows except in a very superficial way; yet in many similar overseas coastal situations it has been ascertained conclusively that man-made structures, particularly rock walls, can drastically alter the natural currents and erosion patterns of foreshores; and that when these investigations were included in the remedial courses of action taken the result invariably solved and stabilised the coastal erosion problem.

Other statements in the report also need to be highlighted and challenged: Moving the water tower from the highest point in Woolli to the lowest makes no sense at all, regardless of the large and wasted cost that would be involved (a cost I'm assuming would be to the CVC; a cost that in itself would be in excess of pursuing a conservation and regeneration strategy); suggesting that in a future emergency trucks would come in and move dwellings to north of the spit is equally illogical, i.e. moving dwellings from the high ground to the low ground... how do Worley Parsons or CVC envisage trucks even reaching the spit when the road is flooded? Other emotive but false inclusions refer to McMansions in Woolli, to Sandmining which has not occurred in Woolli and to stormwater outlets to the beach which do not exist.

What disturbs me about the Worley Parsons report which underpins the CVC Draft Woolli Village Coastal Zone Management Plan is the lack of a whole-spectrum scientific and fact-based approach as displayed and articulated in both the Worley document and in the CVC draft plan. Yet there are many alternative options that need to be explored before anything approaching best practice science, social and economic solutions and outcomes can be determined.

What we find most disturbing is that CVC may choose to adopt a strategy and policy that results in worse-case financial/economic, social, environmental impacts and outcomes for both the Council and for Woolli.

Yours sincerely

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