

EXECUTIVE SUMMARY

I oppose majority of the nominated design changes to the Shell Cove Boat Harbour Concept Plan. In particular, I oppose the nominated increases in apartment building heights, increased number of apartments, and the increased density of the remaining housing lots. I do support relocation of the hotel within in the Town Centre, but oppose the nominated increase in its height and the new provision for the hotel being 30% residential. I also oppose the removal of the nominated maximum total floor area for the project, as well as the exclusion of the hotel and community development from the maximum commercial floor area restrictions.

My primary concerns with the proposed changes are:

- The bulk and scale of the proposed changes stand in stark contrast to the original intended urban form of the area, placing a significant impact on the aesthetics and appeal of the marina town centre, board walk and surrounding Shell Cove housing estate.
- Increased population in such a small area, placing a negative impact on our existing local infrastructure and essential services, including hospitals, medical centres and schools.
- Inadequate provisions for parking, resulting in poor availability of parking for both residents, their guests and tourists, and cars being parked in residential areas.
- Increased traffic congestion on main arterial roads and primary intersections.

My wife and I have lived in the Shellharbour area our entire lives. We bought a block of land within the Shell Cove marina precinct at ballot in February 2016. We were drawn to the lifestyle being promoted by Fraser's Property, as well as the architectural and boutique style of the marina town centre captured in the 2011 concept plan. The proposed changes to the concept plan work to erode the lifestyle originally promoted, with a detrimental impact on both residents and tourists. The proposed increases in scale and bulk will result in diminished architectural character of the town centre commercial and apartment buildings, with the marina town centre moving closer towards that of an inner city high capacity apartment complex, rather than that of a boutique water front community.

INCREASED BULK AND SCALE

The resulting increase in bulk and scale of the Boat Harbour Precinct due to the proposed increases in building heights and housing density will be extremely imposing, both on the marina town centre, surrounding marina board walk and Shell Cove housing estate. The proposed changes will also have a drastic negative impact on visual amenity of the area, as well as diminishing public views to the marina, and increasing the obstruction of ocean and marina views for residents in the surrounding area. The proposed changes are not in keeping with the context and desired future character of the marina town centre, and are not well aligned with the surrounding Shell Cove development, topography and existing streetscape.

The proposed increased housing density, that will lead to reduced land lot sizes and the introduction of more townhouses and apartment buildings, is very concerning. This moves to create an area of subpar housing, not in keeping with the broader premium housing community of Shell Cove. The areas effected will also be the highly sought-after areas adjacent to Shellharbour South Beach (north of the marina) and the area south of the marina entrance, i.e. Precincts A1, A2, G and H.

Examples of the negative impact the increases in density will have can already be seen in recent additions to certain areas of the Shell Cove estate that boarder the marina precincts. Specific examples of the poor outcomes of this can be seen on both Cowries Avenue and The Farm Way, where the over use of medium density housing, with poor building controls, has led to a very negative impact on the streetscape and surrounding residents, with the area having the look and appeal of a Western Sydney housing commission estate.

DIMINISHED ARCHITECTURAL CHARACTER

Implementation of the proposed increases in building heights and housing density will result in diminished architectural character of the designed apartment buildings and marina town centre. The more the floor space ratio (FSR) of these buildings are increased to accommodate the increases in capacity, the less ability the designers will have to maximise building articulation and utilise negative space to produce buildings that have strong architectural character. With the strict guidelines imposed on local Shell Cove residents when designing and constructing their homes, the expectation for the marina town centre to be of high quality and appropriate architecture is not unreasonable.

The negative impact the proposed concept plan changes will have on the architecture of the marina town centre are surmised by development application DA0385/2017. This DA has been lodged by Frasers Property Australia for the Shell Cove marina town centre waterfront apartment building and retail complex, and is currently on exhibition with Shellharbour City Council. The submitted plans show a building that is devoid of architectural character, with the design extremely compromised in order to maximise retail floor space and number of apartment units. The monolithic nature of the design, and lack of significant articulation in the primary frontage and roof plane, both add to the negatively dominating impact this building will have. The plans and 3D models of this building show a structure that is more aligned to cheap bulk housing, or inner-city apartment blocks, rather than that of a feature building that will define the architecture of the Shell Cove Marina Precinct and become the main structure visible from the marina berths.

There is a stark contrast between the original concept for this building, what is currently being used as promotional material by Frasers Property, and what is proposed in DA0385/2017. What was shown in the original concept design plan as three aesthetically pleasing and separate buildings, have been stripped of their architectural character and combined into one large mass. The articulation and character of the original concept design provided architecture more befitting of a new marina precinct, desired new town centre, and the surrounding premium housing estate of Shell Cove. This has been lost in the current proposed design.



3D Model of Current Proposed Design – DA0385-2017 Architectural Plan



3D Model from June 2017 Precinct D Urban Design Guidelines and current Fraser Property Promotional Material*

* Images taken from:

- *"Shell Cove - Precinct D Urban Design Guidelines"*, June 2017, produced by JMA on behalf of Frasers Property Australia
- Promotional Video "The Waterfront, Shell Cove", produced August 2016 by Frasers Property Australia, <http://www.frasersproperty.com.au/NSW/Shell-Cove/Explore>

LOCAL INFRASTRUCTURE AND ESSENTIAL SERVICES

The existing local infrastructure and essential services for both Shell Cove and the broader Shellharbour community are already stretched beyond their capacity. In particular, there is a dire issue with current essential services provided by local hospitals, medical centres and schools.

The two local public hospitals, Shellharbour Hospital and Wollongong Hospital, are experiencing longer than standard emergency room wait times and bed shortages. A report by the independent Bureau of Health Information in April to June 2016 found that 32.2% of patients presenting at Shellharbour hospital emergency department waited longer than 4 hours for treatment. The same report found that the average for NSW was 26.1%. An increase in people moving to this area will stretch these hospitals even further, which will unfortunately result in unnecessary deaths. Refer articles below for further details.

<https://annawatson.com.au/media/latest-media/hospital-emergency-departments-under-pressure/>

<http://www.illawarramercury.com.au/story/4939204/claims-wollongong-hospital-at-crisis-point-due-to-flu/>

As a father of two young children I have experience firsthand the lack of available medical centre services, with all medical centres in our area unable to provide access to medical services within an appropriate timeframe, or continuity with the same doctor over multiple visits. With even more people moving into the area, and no further medical centres planned, this situation will be further exasperated.

The two local public primary schools for Shell Cove are Shell Cove Public School and Shellharbour Public School. Both of these schools are operating above originally designed capacity, with Shell Cove public school utilising 9 demountable buildings as class-rooms. In addition to this, as the Shellharbour Municipality has significantly expanded its population over the years, not a single public High School has been added to the area since 1991 (Albion Park High School – over 10km from Shell Cove). Warilla High School, for which Shell Cove students will attend, is already over populated. In 2015 there was significant public outcry regarding the lack of local high schools, especially considering the planned continued expansion for Shell Cove and the surrounding area (see links to articles below). The further these resources are stretched by unnecessary increases in the Shell Cove population, the more dramatic the impact will be on the education and future for our children.

<http://www.kiamaindependent.com.au/story/3207722/high-school-proposal-gets-thumbs-down/>

<http://www.illawarramercury.com.au/story/3198029/school-refusal-a-one-finger-salute-to-electorate-watson/>

<https://annawatson.com.au/media/latest-media/over-10-million-slashed-from-shellharbour-schools-budget/>

INADEQUATE PROVISIONS FOR PARKING – GENERAL OVERVIEW / APPARTMENTS

One of my biggest concerns having purchased land so close to the marina and marina town centre (approx. 200-300m from both), is the lack of proposed parking. It is clear to me that the provision for parking is inadequate, and that the developer is relying on cars being parked in the surrounding residential areas during weekends and school holidays to cope with the demand. I also fear that even in non-peak times that parking will be insufficient.

The 2017 Traffic Report (Appendix F1) submitted as part of the modified concept plan fails to take a holistic view of the parking requirements of Marina Town Centre, commercial space, community space, marina berth holders, surrounding apartment buildings and the Hotel.

Item 19 of the Traffic Report states:

For the residential units, as per the previous CHA report, parking will be provided in accordance with Council DCP rates for the residents (1 space per one bed unit and 1.5 spaces per 2 and 3 bed unit) with no separate visitor parking (to be accommodated within public on and off street parking).

However, no provision is made for apartment overflow or visitor parking in the calculation for the required public parking spaces – see preceding Table 2, “Revised Calculation of Peak Parking Requirements at Saturday Midday”, page 4. With no provision made for these additional apartment parking requirements, there will be a significant shortfall in available parking spaces in the public domain. This situation is further exasperated with the proposed increases in number of apartment dwellings. In addition to this, the nominated ratios of parking spaces to number of apartment bedrooms underestimates the requirements for the demographic that will live in these apartments, as well as the area in which we live.

INADEQUATE PROVISIONS FOR PARKING – RESIDENTIAL AND BEACH ACCESS

The proposed changes to increase density of the remaining housing lots in future land releases, as well as the introduction of more apartment buildings and townhouses, is of great concern. Not only does this place a highly negative impact on the visual amenity of the area, but it also places a higher burden on on-street parking, as well as off-street public parking areas adjacent to these residential areas. This is of even greater concern with, as previously discussed, the affected areas being the highly sought-after residential areas adjacent to Shellharbour Beach and the marina entrance.

The more the density is increased in these remaining areas, the worse parking will be for these residents. With a high number of households now unable to accommodate their parking needs within their own property boundaries, many are turning to on-street parking. The negative impact of this is further worsened the more housing lots are reduced and townhouses and apartment buildings are introduced. The proposed increases in housing density should not be allowed.

The proposed increases in housing density in the areas adjacent to Shellharbour South Beach and the marina entrance will have a significant negative impact on public access to these areas. I am deeply concerned that public parking spaces adjacent to these areas will become overflow parking for the local residents. This breaks the 2011 concept plan’s strategic planning commitment for “*encouraging both conservation and enjoyment of the natural resources and coastal environment of Shell Cove*” as well as the commitment for “*Enhancing access to and within the Boat Harbour Precinct*” (Section 4.2 of Appendix C Modified Instrument of Approval and Statement of Commitments).

Response to Submission: MP 07_0027 MOD 1
Modification to Shell Cove Boat Harbour Concept Plan

The modified concept plan identifies several areas as “Foreshore open space improvements”, (Appendix B Concept Plan Design Report, section 4.1), yet no commitments is made for minimum parking in these areas. The aerial photo below identifies several existing public beach access car parking spaces along Bass Point Tourist Rd that as a minimum should be maintained. The parking for these areas should be significantly increased to accommodate for the expected increases in the number locals and tourists frequenting this area.

In addition to this, public access to the beach, beach green areas and existing beach erosion protection, i.e. sand dunes, must be maintained. There is no commitment for protecting these items in the proposed concept plan changes.



INADEQUATE PROVISIONS FOR PARKING – HOTEL

The 2017 Hotel Traffic Report (Appendix F2) miscalculates and underestimates the impact the proposed provision for allowing the hotel to be 30% residential will have. The report states that only 15 apartments will be residential, with the remaining 95 being serviced apartments, with 48 of these dual key. Firstly, I fail to see how 15 apartments from a possible 110 is 30%, and I suspect that more apartments will be changed to residential at a later date. As stated previously, I believe that the use of 1.5 spaces per 3 bedroom apartment miscalculates the requirements for the demographic that will live in these apartments, as well as the area in which we live. The report does however correctly identify the impact that dual-key properties will have on parking requirements, increasing the actual number of dwellings to 131.

The calculated parking requirement of 265 spaces in Table 1 (item 5) would provide sufficient parking provision for the hotel. However, I disagree with assertion to reduce the required spaces from 265 to 209 – see Table 2, items 6 through 9. The arguments put forward supporting this reduction are very weak.

The statement that there is “no allowance for people to travel by shuttle bus/taxi” and hence parking rates should be reduced is unfounded. The only public transport option for holiday makers would be the train at Shellharbour Junction. There would be a very minute number of travellers from Sydney taking this option, with the majority wanting a car for the convenience and ability to experience the wider Shellharbour and South Coast area.

Response to Submission: MP 07_0027 MOD 1

Modification to Shell Cove Boat Harbour Concept Plan

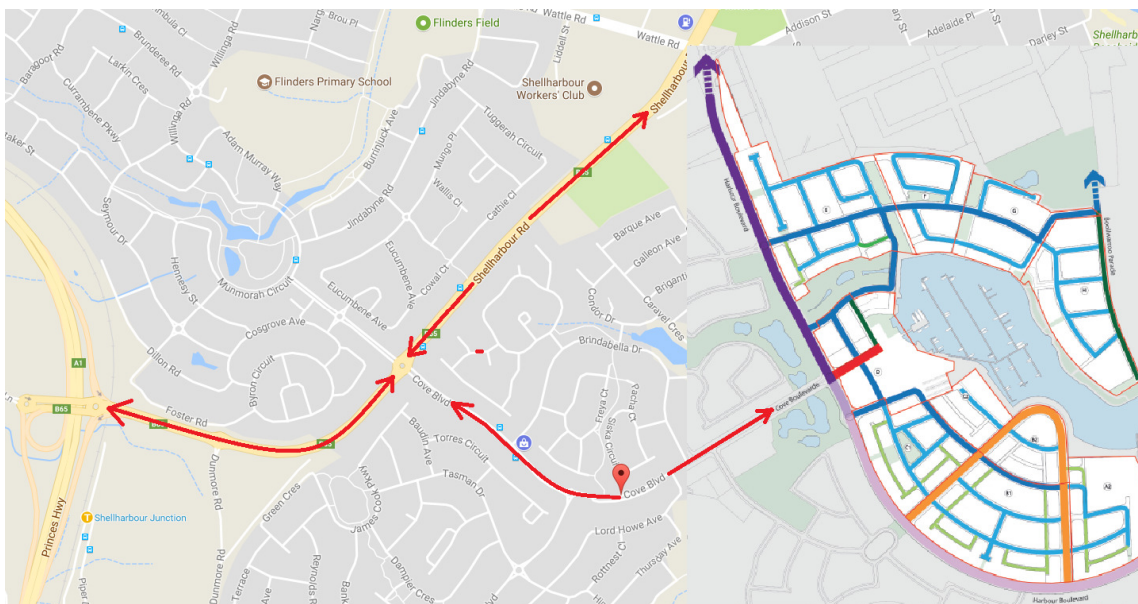
The case is presented that parking should not be required to accommodate 100% of the serviced apartments, stating an occupancy rate of 80% during peak times. I disagree with this assumption. There are minimal options for tourist accommodation in Shell Cove and the surrounding Shellharbour area. As Shell Cove grows in popularity as a destination, so will the occupancy of this hotel. It is not an unrealistic expectation that the hotel will near 100% capacity during peak times, with the timeframe of the peak to extend well over 1 month during the Christmas school holidays and following January summer holiday period. To make no provision for the entire parking requirements over this time would have a significant impact on the amenity of the hotel, the Marina Town Centre and surrounding residential area.

The suggestion in Item 12 that overflow parking for the hotel could be accommodated within the business park site located to the south east of the town centre is laughable. This nominated area is over 1.5km from the town centre, being separated by a residential housing estate.

INCREASED TRAFFIC CONGESTION – GENERAL OVERVIEW

There is great concern for the drastically negative impact any increased traffic movements will have on the streets of Shell Cove and the surrounding area, in particularly Cove Boulevard, Shellharbour Road, and the roundabout at the intersection of Cove Boulevard and Shellharbour Road. As a local resident, I witness first hand on a daily basis the traffic congestion experienced on these roads and round-about. At peak traffic times, moving through the round-about often becomes a “running of the gauntlet” situation, having to be quite patient to find an opening, then quite aggressive to make it to the other side unscathed. This is without the future population of the approved concept plan, let alone any increases based on the proposed modifications.

For all Shell Cove Marina Precinct residents, and the majority of the wider Shell Cove community, the most direct route to the Princes Highway will be along Cove Boulevard and Shellharbour Road. The future secondary access route along Harbour Boulevard, that will meet up with Shellharbour Road, will work to elevate future increases in traffic to Cove Boulevard, but in peak times a significant amount of this traffic will still be diverted south along Shellharbour Road, to the Cove Boulevard / Shellharbour Road roundabout, in order to reach the Princes Highway. This will have a significant impact on a roundabout that is already struggling under current demand. See map below.



INCREASED TRAFFIC CONGESTION – 2011 CONCEPT PLAN TRAFFIC REPORT

The 2011 Concept Plan Traffic Report (Appendix A), clearly identifies that Cove Boulevard, Harbour Boulevard and Shellharbour Road will be extremely busy roads, and that a high level of congestion is expected at the intersection of these roads. Table 3-4 “Predicted Intersection Performance (with full development)” of this report identifies that the traffic signals at the corner of Shellharbour Rd, Harbour Bvde and Wattle Rd will have a rating of ‘D’ (Near capacity and accident study required) during PM and holiday Peak times. While the Shellharbour Rd / Cove Bvde roundabout will have a rating of ‘F’ (At capacity; requires other control mode) during holiday Peak times.

The 2011 traffic report describes both the intersections of Shellharbour Rd/Cove Bvde and Harbour Boulevard/Cove Bvde as being highly congested and not providing satisfactory operation during peak periods. The excerpt below taken from page 15 of the 2011 Concept Plan Traffic Report (Appendix A) provides further detail of this:

3.3.8 Shellharbour Rd/Cove Bvde

The Shellharbour Rd / Cove Bvde roundabout is expected to be relatively congested in the AM and PM commuter peak periods in future. Significant queuing on the southbound approach of Shellharbour Rd is predicted in the PM peak (over 190m) and on Lakewood Bvde in the AM peak (about 130m). This is based on the proposed modified intersection arrangement with two lane approaches on Shellharbour Rd and the left-turn slip lane deleted.

The roundabout may not operate satisfactorily in holiday peak periods, with significant queueing predicted on Shellharbour Rd North. The intersection may need to be reconstructed as a signalised intersection in the longer-term future. This would better manage the predicted high peak traffic flows on Shellharbour Rd and allow for safer crossing of Shellharbour Rd by pedestrians and cyclists. It is important to note that the TRACKS model traffic forecasts are relatively conservative (high), when compared with trip estimates derived from RTA trip rates. Also, holiday peak flows will be an infrequent occurrence and it is not reasonable to design for these flows.

3.3.9 Harbour Boulevard / Cove Bvde

The Harbour Bvde / Cove Bvde intersection would operate efficiently as a single-lane roundabout. However, traffic signals may be an option here in the longer-term, to enable easier pedestrian movements during peak periods if high traffic volumes occur on Harbour Bvde near Cove Bvde. The effective queuing space between the Cove Bvde / Harbour Bvde and Road A / Harbour Bvde intersections is about 100m. This would be a potential problem for both the signals and roundabout arrangement at the Harbour Bvde / Cove Bvde intersection.

An analysis of intersection operation under roundabout and signalised control indicated that:

- For the roundabout option, queues in excess of 100m would only occur in the PM peak. This could be reduced to 36m with a short additional lane for northbound left turns from Harbour Bvde into Cove Bvde.*
- Queues beyond 100m are likely to occur at several periods of the day with signals.*

Queues would be significantly less in other time periods.

The choice of signals or a roundabout affects network efficiency, the risk of rat running through Stage 10 residential streets and pedestrian movements. A roundabout is recommended, although it may affect the movement of pedestrians in the longer-term future when traffic volumes build on Harbour Bvde.

Based on this information, placing additional traffic volume onto any of these roads will have a detrimental impact to both the local community and tourists, and should not be allowed. For residents living in an area that is classified as Regional Rural, the identified traffic congestion and delays at these roads and intersections are significant, and will have a dramatic impact on their quality of life.

INCREASED TRAFFIC CONGESTION – 2017 REVISED CONCEPT PLAN TRAFFIC REPORT

The traffic report submitted as part of the revised concept plan is flawed on multiple levels, and needs to be revised to indicate the true traffic movements that will result from proposed concept plan changes and the resulting increased population. The traffic report and Street Networks and Types submitted with the revised concept plan deliberately make no mention of Cove Boulevard, Shellharbour road, or the intersecting roundabout.

Firstly, the report drastically under-estimates the number of cars and traffic movements that will result from the increase of dwellings by 318, as well as the provision for 30% of the hotel complex to be residential.

Item 10 of the Traffic Report utilises reduced traffic rates to calculate the impact the increased number of dwellings has on peak traffic movements. The use of these reduced rates makes the incorrect assumption that the residents of Shell Cove adhere to the averages defined for other regional areas. The residents of Shell Cove are a mixture of hardworking professionals, tradesmen and service providers, with many households having dual incomes and adult children. This is confirmed by recent 2016 census data. This demographic results in higher than average car utilisation and resulting traffic movements. Note that a similar argument can be made that the traffic movement rates used in the approved concept plan are also insufficient.

Item 13 of the 2017 Traffic Report states that the provision for allowing the hotel to contain 30% residential will have no material impact on traffic generated by the hotel. This statement simply is not true. The provision for 30% residential shifts the demographic from that of holiday maker to resident. It is a fact that residents are more likely to have a higher impact on peak traffic times, than that of holiday makers. This is due to the fact that residents travel to and from their place of work, as well as transporting children to and from school, which as previously discussed are not located within the Shell Cove Marina Precinct area or within walking distance, and this travel primarily occurs during peak traffic times.

Secondly, the traffic report fails to identify that the traffic movements experienced at Shell Cove are not evenly distributed in both directions, with the directional flow of traffic biased dependant on morning and afternoon peak periods. This is due to Shell Cove being water bound on its eastern side, and having only 2 primary access routes. In addition to this the primary place of work for most residents, is external to the Shell Cove area. Other critical items such as High Schools, religious based Primary Schools, and major shopping centres are also external to the Shell Cove area.

Based on the above, a new Traffic Report should be produced in order to ascertain the true impact on traffic that the nominated changes will produce. Recommendations regarding modifications to intersections, widening of roads, provisions for bus-bays, should be enforceable and paid for by the developer.

MISLEADING SHELL COVE RESIDENTS AND LAND OWNERS

As a recent purchaser of land within the Shell Cove Marina Waterfront Precinct, I was completely shocked when I was informed of the proposed changes to the Shell Cove Boat Harbour Concept Plan. I was even further shocked when I was told that these changes have been in planning for over two years. I feel I have been misled by both Fraser Properties Australia and Shellharbour City Council throughout this entire process.

We were originally lured by Fraser Property Australia's promotional material that portrayed a boutique housing community and marina town centre high in architectural character. We were drawn in by the lifestyle promoted, and wanted to live in a nicer area for the sake of our children. This promotional material is still largely unchanged today, with Fraser still promoting a dream that does not reflect the reality of the proposed concept changes

As previously stated I purchased my land at ballot in February 2016, and settled/registered in December 2016. As part of this process all potential land purchasers were required to attend an information session prior to the ballot. At no point in this information session, or in the provided material, were we informed of the proposed Concept Plan changes that were in planning at the time, and the extent to which they would significantly impact on both the amenity of the area within which we were about to purchase land or our lifestyles.

On Sunday 17th September 2017 I attended another information session in preparation for the Oystercatcher Land Release at The Waterfront, as at the time I was considering purchasing another lot of land. At no point in this information session, or in the provided material, were we informed of the proposed changes that had already been submitted to the NSW Department of Planning and Environment for evaluation, and were soon after placed on public exhibition.

I have also subsequently learned that all Shellharbour City Councillors were informed of the proposed concept changes in June 2017, with some informed even earlier, being involved as the changes were being planned. This is a significant breach of public trust, with Shellharbour City councillor elections held on Saturday, 9 September 2017. Had the public been informed of the proposed changes to the concept plan in advance of this election, the election outcome could have been significantly different, with the public having the opportunity to vote in councillors that would act in the best interest of the community and rather than developers.

This is my storey as a land owner, but consideration must also be given to the hundreds of Shell Cove residents and investors that have purchased land, houses and townhouses based on the same misinformation over the years. For the entirety of Shell Cove's existence, it has been promoted by developers and Shellharbour City Council as a prestige/premium housing estate, with low density housing, and minimal townhouses, etc. Homeowners building their dream home have been held to the highest of development guidelines, to ensure the quality and architectural character of the housing in the area.

Now that 70-80% of Shell Cove has been sold off, the developer and Shellharbour City Council are changing the rules. Changing the nature of the boat harbour precinct to the extent proposed is not in the spirit of the development. People have purchased into the area with certain expectations, and the proposed changes work to unfairly put these people at a disadvantage in order for both the developer and council to increase their profits. The only reason put forward to justify this, is that market forces mean there is a demand for additional housing, and changes to NSW government legislation are permitting them to do this. I don't see this as valid reasoning to shaft an entire suburb of good hardworking people.

RECOMMENDATIONS

In conclusion, I make the following recommendations for your consideration:

- The proposed concept changes for increasing the number of dwellings and housing density within the Shell Cove Boat Harbour precinct be rejected.
- The proposed increases in building heights be rejected.
- The proposed provision for the hotel building being 30% residential be rejected.
- The proposed removal of the total gross floor area maximum limitation of approximately 150,000m² be rejected
- The proposed removal of the hotel and community development from the maximum gross floor area of 22,000m² be rejected.
- The proposed relocation of the hotel be approved.
- A new independent Traffic study be performed to determine the impact on both Parking and Traffic, utilising 2016 census data to truly reflect the needs of the Shell Cove demographic.
- Recommendations regarding modifications to intersections, widening of roads, provisions for bus-bays, should be enforceable and paid for by the developer.
- Traffic lights with 4-way give way with car turning be provided at the intersection of Cove Boulevard and Shellharbour Road.
- Introduction of enforceable minimum underground car-parking spaces for the hotel, all apartments and commercial spaces. This should be such that the parking for each building is self-supported within the dedicated underground car park, with the on street and above ground public car parking reserved for apartment guests, tourists and other visitors.
- A suitable site for a new public High School to service the expanding Shell Cove area and broader Shellharbour community be nominated.

In addition to the above, I recommend that the Director General's key recommendations as detailed in the Director Generals Requirements document from the 2011 Concept Plan Submission be addressed in terms of the proposed concept plan changes:

- Demonstrate suitability of the proposal with the surrounding area in relation to bulk, scale, amenity (including noise) and visual amenity having regard to the Coastal Design Guidelines of NSW (2003) and the NSW Coastal Policy 1997.
- Address the visual impact of the proposal in the context of surrounding development and relevant mitigation measures. In particular address impacts on the amenity of the foreshore, overshadowing of public reserves, loss of views from public places and cumulative impacts.
- Address existing capacity and requirements of the development for sewerage, water, electricity, waste disposal, telecommunications and gas in consultation with relevant agencies. Identify and describe staging, if any, of infrastructure works.
- Address developer contributions in terms of required infrastructure, and provide the likely scope of any planning agreement with Council/ Government agencies.
- Protect existing public access to and along the beach and coastal foreshore and provide, where appropriate, new opportunities for controlled public access. Consider access for the disabled, where appropriate.
- Address coastal hazards and the provisions of the Coastline Management Manual. In particular consider impacts associated with wave and wind action, coastal erosion, climate change, sea level rise and more frequent and intense storms.

Your Sincerely
Jason Goodes