



Coastwatchers

Eurobodalla's environment group

SUBMISSION TO THE SOUTH COAST REGIONAL SEA LEVEL RISE POLICY AND PLANNING RESPONSE FRAMEWORK – REF: E13.7268

24 September 2104
The General Manager
Eurobodalla Shire Council
email: council@eurocoast.nsw.gov.au

The Coastwatchers Association Inc. welcomes the opportunity to comment on the South Coast Regional Sea Level Rise Planning and Policy Response Framework on behalf of our two hundred strong membership.

Our Association is a community advocacy and campaigning organization that strives to protect the environment of the Eurobodalla. We recognize that people are part of the environment and not separate from it, and campaign for:

- Empowering our community to live and work together sustainably.
- The creation of environmentally friendly jobs.
- Maintaining our clean, healthy catchment and coasts.
- Planned development with as little environmental destruction as possible.
- Ecologically sustainable management of our forests.
- Action to minimise climate change.
- Ensuring hard won environmental gains are not lost.

South Coast Regional Sea Level Rise Planning and Policy Response Framework

The South Coast Regional Sea Level Rise Planning and Policy Response Framework is the result of a recommendation of Council due to claims by some property owners that the Council's adopted sea level rise benchmarks were too high, not evidence based and affecting property values.

NSW Government coastal reforms and advice from the NSW Chief Scientist, that although the current science was adequate, locally relevant sea level rise projections, based on accepted scientific advice should be investigated.

Coastwatchers believes the resulting Study to be a thorough examination of the science, providing a sound basis for determining appropriate regional sea level rise projections and an adaptable risk management strategy for inclusion in Council's Coastal Zone Management Plan.

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The Precautionary Principle

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Coastwatchers is strongly supportive of the Precautionary Principle and its relevance to the issue of climate change and sea level rise in coastal areas.

The precautionary principle requires a risk averse approach to decision making. Where there are threats of serious or irreversible environmental damage, lack of full scientific certainty is not to be used as a reason for postponing measures to prevent environmental degradation.

Concerns about how sea level rise will affect the Eurobodalla

Sea level rise has become a contentious issue for many in the Eurobodalla, especially for owners of property identified as being potentially at risk.

However, Coastwatchers has long been concerned about climate change and the potential impacts of sea level rise on the coastal environment, including erosion of beaches and foreshores and the effect that protective measures could have on coastal and near-shore marine ecosystems, increasing salinity of coastal groundwater and estuaries and the resulting affect on the health of salt-sensitive plants and animals and freshwater habitats.

We are also concerned that protective measures to protect property and infrastructure, such as sea walls or sandbag levees would restrict access to public foreshore and beaches and create problems for adjacent properties.

Coastwatchers has kept up to date with recent reforms to coastal management and are cognisant of the need to address sea level rise and the impact of future coastal hazards as an integral part of coastal zone management.

Climate science and projected sea level rise

Coastwatchers stays informed about climate change and sea level rise projections and are conscious of the need for Council to adopt a management strategy that will accommodate the uncertainty associated with the timing of sea level rise and the need to plan strategically to manage the associated risks.

We are aware of the upward trend (~ 3.2 mm/yr) in mean sea level rise examined at all sites measured over over the past 20 years that is consistent with satellite altimeter data for the same period and allows for oscillations of natural variability, and at a similar rate of rise to the global average reported in the IPCC in their 4th and 5th assessments.

We agree with the IPCC sea level rise projections, which are based on the majority scientific opinion, that sea levels will eventually reach RCP8.5 values (0.26m by 2050 and 0.98m by 2100) and believe that RCP8.5 is a suitable basis for a sea level rise projection for the South Coast region.

Coastwatchers supports the need for on-going examination of changes in sea level rise by analysing data from the existing tide gauge network, and reacting appropriately to any deviations from the selected projection as sea level rises and also, that a suitable analysis and reporting regime needs to be established and in place as soon as possible, to ensure regular review and updating of both contemporary mean sea level rise and future projections, as required, in the future.

Coastal Hazard Planning

Coastwatchers agrees that the following Coastal Hazard Planning Areas should be adopted by Council:

- **Current Hazard:** Areas that are **presently, or will become imminently threatened** by the 'design' hazards (e.g. design coastal storm, design flood) over the next 15 years. In this area, immediate actions are required to advise, prepare and prevent harm;
- **Medium Term Hazard:** Areas that are projected to be **impacted within the next 15 to 35 years**. In this area, plan sensibly, monitor changes and respond to any unexpected changes;
- **Strategic Hazard Planning:** Areas containing development that are projected to be impacted within the next 35 to 100 years. In this area, forward planning is called for along with monitoring to inform future actions;
- **Possible Maximum Strategic Hazard:** Areas of existing or proposed critical infrastructure that are projected to be impacted over the next 100 years if a very high sea level rise scenario (greater than RCP 8.5) occurs

Final Comments

Coastwatchers commends the South Coast Regional Sea Level Rise Planning and Policy Response Framework which provides Council with appropriate sea level rise projections and an adaptable risk management strategy for use in their Coastal Zone Management Plan.

We acknowledge that different responses are required for different types of development and that existing development should be allowed to remain in place for as long as it continues to pose no risks to adjacent property or to the community.

We agree that proposed developments need to be subject to controls to ensure that they are safe for their projected life and can be adapted, relocated, or decommissioned with relative ease and without becoming a financial responsibility for ratepayers when that time comes.

We agree that other developments that are important to the functioning of the community (critical utilities, such as roads, bridges and other infrastructure) would need detailed studies to justify their viability and worth.

We also accept that successful management of sea-level rise will only be achievable if a consistent, fair, open and well communicated approach is adopted, based on the stated guiding principles dealing with: Integrity; Responsibility; Flexibility; Consistency; Communication and Transparency; and, Avoiding Complexity. We also advocate a precautionary approach.

We certainly agree that, regular on-going review of the policy, framework and future sea-level rise projections, followed by adjustment of practices based on experiences and updated information will be required.

Coastwatchers trusts that, common sense and good judgement will prevail and Council will adopt the South Coast Regional Sea Level Rise Planning and Policy Response Framework to assist them in their consideration of sea level rise in future policies and planning and completion of the Coastal Zone Management Plan.

Reina Hill

Vice President