

# Save Collingwood Beach

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Mr. Russ Pigg  
General Manager  
Shoalhaven City Council  
P.O. Box 42  
NOWRA NSW 2541

3 February 2017

## **SUBMISSION ON DRAFT SHOALHAVEN COASTAL HAZARD REVIEW**

Dear Mr. Pigg

Save Collingwood Beach is a partnership of organisations and members of the community concerned about the well-being and resilience of Collingwood Beach in Vincentia. These are currently Jervis Bay Regional Alliance, Vincentia Matters, BirdLife Shoalhaven, National Parks Association of NSW Milton Branch and Shoalhaven Bushwalkers.

While SCB was specifically set up to resist attempts to degrade the values of Collingwood Beach, the above partner organisations are keen to comment on any proposed plans that will impact the Shoalhaven coast and not just those that relate to Collingwood Beach.

### **Overall position statement**

**We do not support the Shoalhaven City Council's (Council) Revised Coastal Hazard Review (Review) because it is based on Sea Level Rise (SLR) projections which do not reflect widely accepted scientific opinion. As such it would be reckless and irresponsible to use it as basis for the coastal planning and management of Collingwood Beach and the rest of the Shoalhaven.**

### **Incorrect basis of projections**

Council has resolved to base the Review on the opinion of a single locally-based civil engineer and the submission of the Non-Governmental Panel on Climate Change, a known climate-sceptic organisation funded by the fossil fuel industry's Heartland Foundation.

This ignores the advice of their own professional staff and rejects the recommendations contained in a report jointly commissioned by the Shoalhaven and Eurobodalla councils, prepared by Whitehead & Associates. This report encourages a precautionary approach in estimating sea level rise, however the Review has adopted projections for 2100 even though they themselves state they are "85% chance of being exceeded." Even the mid-range projections have a 15% chance of being exceeded. To acknowledge such a potential margin of error and still use this as the basis for coastal hazard maps and for future coastal planning can only be seen as reckless and irresponsible.

This decision has significant implications, as it means that totally flawed coastal hazard maps will be used to define the "Coastal Vulnerability Area" under the Coastal Management Act 2016 as well as the State Environmental Planning Policy (Coastal Management) 2016, once they come into force. This will basically mean that Council will knowingly allow inappropriate developments in coastal zones. This will put at risk public safety and increase, rather than reduce, the potential for damage to public infrastructure and private property from coastal hazards, all of which are inconsistent with the Management Objectives for Coastal Vulnerability Areas set out under Section 7 (2) of the *Coastal Management Act 2016*.

## **At odds with other Councils**

Council's SLR projections bear no alignment with all other south coast councils nor the prior NSW Government standard and as such cannot be accepted in its determination of risk and impact. Eurobodalla Council has adopted a 980mm rise for 2100 and Kiama, Shellharbour and Wollongong Councils have adopted a 900mm rise and the Bega Valley Shire Council 910mm. The Eurobodalla and Shoalhaven Councils co-operated in developing a scientifically based SLR standard yet Council abandoned that position.

## **Indemnity issues**

If Council adopts their SLR projections and ignores widely accepted competent scientific opinion, they are likely to be held liable under the Local Government Act. This we understand is supported by advice from the Global Law Firm, DLA Piper, provided by Council's insurers Statewide Mutual in a letter to the General Manager dated 13 March, 2013. For these reasons, we are extremely concerned about the financial and legal liability that may be incurred by ratepayers arising from totally flawed Coastal Hazard Maps based on inadequate SLR projections. This would go against the overwhelming majority of ratepayers who, in Council's own 'Our Coast Our Lifestyle' survey, said they did not support the approval of developments in areas at risk because of concerns about the long term financial risk.

## **Implications for Collingwood Beach**

The implication for Collingwood Beach of adopting these SLR projections is that the Immediate Zone of Reduced Foundation Capacity will move seaward and the shared pathway and dune at Collingwood Beach will be landward of it. This has the potential to reopen the Collingwood Beach dune vegetation lopping issue which was resoundingly rejected by the Shoalhaven community in late 2016. If the altered hazard map for Collingwood Beach based on this flawed science is taken into account in the development of the revised draft Dune Management Plan for the beach, the Plan will not be accepted by the community and community opposition will be galvanised once again.

## **Inclusions of information collected by Collingwood Beach Preservation Group**

We are amazed that the projections specific to Collingwood Beach have taken into account information collected by the Collingwood Beach Preservation Group (CBPG). No details have been provided on how this information was collected and if it has been independently reviewed. Given the CBPG is made up of some local residents, it seems to be quite inappropriate to take this into account in any way in this Review.

## **Understatement in the description of Collingwood Beach**

We would question the statement that the Collingwood Beach dune "is in relatively good condition", which ignores existing risks. Recent storms have removed sand from sections of the beach and resulted in the collapse of a section of the path and seating at the southern end. It is only due to many years of effort by Bushcare volunteers that areas of the dune have been stabilised and more damage been avoided. Given the prolonged dispute with some local residents on vegetation management, Council has stopped any further plantings, even grasses. Meanwhile extensive vandalism has continued, so the net result is the structure of the dune is gradually being compromised and it remains susceptible to erosion from a storm event at any time, even at current sea levels.

We are willing to discuss any aspect of this submission you may desire.

Yours sincerely,



**Rob Dunn**

**Signed on behalf of Save Collingwood Beach**