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Luke Roberts  
Project Manager – Coastal Hazards  
Department of Premier and Cabinet  
GPO Box 123  
Hobart TAS 7001

**By email:** [luke.roberts@dpac.tas.gov.au](mailto:luke.roberts@dpac.tas.gov.au)

Dear Luke

## **Draft Coastal Hazards Package**

Thank you for the opportunity to comment on the draft Coastal Hazards package.

At the outset, the Tasmanian Coastal Alliance (**TasCA**) would like to commend the government on its comprehensive response to coastal hazards, and for the recognition of the need to implement mitigation measures through the planning system.

On the whole, the building and planning controls proposed for each hazard band strike a reasonable balance. It is our view that the mapping and proposed risk management methodology represents a significant improvement to the government's current approach to both coastal inundation and coastal erosion hazards. In particular, the use of high hazard mapping in place of the poorly defined "actively mobile landform" terminology in the Tasmanian Coastal Policy will provide greater clarity regarding the application of the Coastal Erosion Code.

A few comments in relation to the draft coastal hazards package are set out below.

### **Description of coastal hazards**

The paragraph describing coastal hazards in both the Summary Report (page 3) and Final Report (page 7) emphasises the negative aspects of coastal processes. The summary paragraph also minimises the role of humans in creating hazardous situations (though this is acknowledged in the Final Report). We suggest that these paragraphs be replaced by the following:

*The coast is a dynamic system, shaped by wave, wind and tidal movements. Influenced by weather patterns, seasonal variations and climate change, these processes can have a temporary or permanent influence on the coastline. When natural processes lead to erosion and inundation that threaten to cause harm or damage to public and private assets, environmental and/or social values, the processes are described as hazards. Human modification to coastlines can also influence the way in which natural processes play out along the coast, adding to or reducing hazards within an area.*

In discussing exposure to coastal hazards, the reports note that "No place in Tasmania is more than 115km from the sea" (Summary report, p4; Final Report, p8). While we appreciate that this is intended to emphasise Tasmanians' connectedness to the coast, it may give the misleading impression that properties up to 115km from the shoreline are susceptible to coastal hazards. We recommend that the sentence be removed to avoid any such confusion.

We also recommend that a statement be included to clarify that, while current projections have been limited to 2100, sea level rise (and its associated hazards) is expected to continue beyond that time.

### **Currency of mapping**

We are supportive of the approach of relying on mapping, rather than qualitative criteria, to determine restrictions on use and development. However, the effectiveness of such an approach relies on the accuracy of the maps used and the data on which the maps were generated.

We are confident of the methodology used to determine coastal erosion, but note that there are a number of areas around Tasmania for which insufficient data are available to accurately map erosion risks. We recommend that resources be made available to map these 'investigation areas' to ensure Statewide coverage and allow for a unified, consistent implementation of the Coastal Hazards package.

The current Sea Level Rise Planning Allowances from which the High Hazard inundation areas have been determined are based on the findings in the Fourth Assessment Report of the Intergovernmental Panel on Climate Change (*IPCC*), while the more recent Fifth Assessment Report of the IPCC includes materially higher projections for sea level rise. We would strongly urge the Tasmanian Government to adopt and incorporate the Fifth Assessment projections.

The draft report notes that the sea level rise planning allowances are currently under review and mapping will be updated to reflect the revised allowances when the review is complete. In the interests of ensuring that mapping used accurately reflects anticipated risks, we urge the government to complete the review as soon as possible.

The mapped hazard areas are, quite properly, conservative. This reflects the precautionary approach advocated by the State Coastal Policy. However, there will likely be situations whereby a landowner considers that a hazard band allocated to their property is too high, or a third party or council considers that a hazard band allocated to property is too low. The draft report does not set out a methodology for determining when, and on what evidence, amendments to the mapping will be considered. We urge the Tasmanian Government to develop and implement a clear process for amending the maps, with explicit criteria requiring rigorous analyses, and ensuring that maps are only amended where the government is satisfied that the outcomes of the State Coastal Policy will be met.

### **Coastal refugia**

TasCA notes the importance of protecting future coastal refugia, being those coastal areas needed to accommodate species whose habitat is lost as a result of coastal inundation or erosion.

The Natural Assets Code within the draft State Planning Provisions provides for local mapping of future coastal refugia areas, and restricts use or development accordingly.

The current inundation and erosion mapping do not seek to identify future coastal refugia (though they provide insights into areas that should not be considered refugia, given risks of future loss). TasCA understands that some work has been done in assessing the implications of sea level rise on coastal natural values and identifying refugia and potential retreat pathways.

TasCA urges the government to make this work publicly available to support local governments to map future coastal refugia areas within their municipality, in order to secure protections under the Natural Assets Code. This will also be critical in assisting planning authorities to identify landward habitat migration routes that are best protected through rezoning, and to allocate resources to ecological restoration where appropriate.

### **Guiding planning decisions**

The summary and final reports broadly acknowledge that assessments will need to be made in relation to each planning authority's policies regarding "tolerable exposure" and approaches to retreat and defence.

We urge the Tasmanian government to support planning authorities to identify those areas that can be developed and defended, those that should be prioritised as future coastal refugia areas and those that may be subject to temporary development followed by planned retreat.

Similarly, the State government should develop a suite of planning tools to assist local planning authorities to consistently apply the Coastal Erosion and Coastal Inundation Codes, particularly in relation to criteria such as "tolerable exposure" and "increased risk to neighbouring properties".

### **Impacts on neighbouring properties**

TasCA supports the need for applicants proposing works in low, medium and high bands to demonstrate that the work will not impact on other properties. However, as currently drafted, an applicant is only required to demonstrate that the works will not impact on “neighbouring properties”.

Given the dynamic nature of coastal processes, impacts from coastal works may be felt at locations other than those immediately adjacent to the works. We recommend that applicants be required to show that the works will not increase the inundation or erosion risks at any other property. At the very least, “neighbouring” should be replaced with “nearby”.

Overall, the draft coastal hazards package does a good job of meeting the outcomes of clauses 1.4.1 – 1.4.3 of the State Coastal Policy. TasCA commends the government on the hazards package and hopes that similarly rigorous policies can be introduced to achieve the State Coastal Policy outcomes relating to protection of natural and cultural values.

If you would like to discuss any of our comments, please do not hesitate to contact Dr Eric Woehler or Chris Rees.

Yours sincerely,



Jess Feehely  
Secretary  
ACS (Tasmania)



Dr Eric Woehler  
Convenor  
BirdLife Tasmania

on behalf of the Tasmanian Coastal Alliance