

9 November 2022

The General Manager Eurobodalla Shire Council PO Box 99 Moruya NSW 2537

SUBMISSION - DRAFT OPEN COAST COASTAL MANAGEMENT PROGRAM (CMP)

Development of the Eurobodalla Shire's CMP over the past 12-months has focussed on the predicted impacts of climate change on coastal infrastructure and properties. The Rosedale Association Inc. (RAI) believes that climate change impacts on beaches and dunes, and the effects of increasing population size, will also be significant on decadal scales and should be highlighted and addressed in CMP options.

The Association is concerned that actions documented for Rosedale in the draft CMP are not evidenced-based. Further, the CMP does not embrace community education and engagement and cultural inclusion as valuable tools to achieve CMP goals. We would welcome a move away from the outdated model of increased policing, barriers and negative signage as enforcement strategies, in favour of information and education of communities on the importance of valuing, respecting and caring for the environment.

Rosedale should be included as a high priority beach

We note that Rosedale is rarely mentioned in the draft CMP. For example, it is not included in the list of high priority beaches where property and infrastructure are threatened by shoreline recession and beach erosion, coastal and tidal inundation, cliff instability or dune instability (Table 2-2). In addition to those threats, the Rosedale community will need to deal with other long-term threats, including the pollution of, and runoff from, Saltwater Creek, increased stormwater and erosion, increased vehicle and pedestrian traffic, litter, bushfires, feral animals (e.g., rabbits and cats) and weeds.

Dunes rehabilitation and maintenance should be supported by the CMP

Dunes provide important habitat for endemic plants and wildlife, stabilise beaches and present a dynamic barrier to inundation and increased storm events associated with climate change. In addition to sea level rise and storms, dunes are vulnerable to damage from human activities, weeds, feral animals and bushfires, as witnessed on Rosedale beaches during the devastating 2019 NYE bushfire. The draft CMP should acknowledge the increased frequency and intensity of bushfires as a threat to the coastal environment area.

In 2021 the Rosedale Association initiated a program to monitor and rehabilitate Rosedale dunes. The program utilises local volunteers, Association funds, and Council and Landcare resources. We have made good progress in stabilising beach pathways, limiting erosion and damage from human activities, managing feral animals, removing weeds, propagating and replanting native species, and documenting historical changes. Community education and engagement are an important element of this project. Community members are developing an understanding of the work being undertaken, why it is important to the long-term stability of the dunes and what individuals can do to help. In addition, consultation with the local Aboriginal Land Council at Mogo has also allowed us to understand and respect their needs, for example, in terms of beach access for cultural fishing activities. The CMP should recommend the expansion of dune rehabilitation projects to other beaches; and provide support through coordinated research, monitoring, resource allocation, community education and cultural inclusion.

The CMP should precipitate an upgrade of erosion control measures

Mangrove swamps, rivers, estuaries and intermittently closed and open lakes and lagoons (ICOLLs) are another important component of the coastal environment. In addition to being habitats for aquatic life, such water bodies provide nurseries for various marine species, filter runoff and pollutants, and affect water quality along beaches. Our long-term experience with Rosedale's Saltwater Creek indicates that current regulations are inadequate for protecting it from development in the catchment; while there is clear evidence of water quality deterioration there is no basis for intervention if developers and builders adhere to basic, mandatory measures.

Programs are in place to regularly monitor and assess the water quality of major rivers, but there is very little monitoring of the hundreds of small ICOLLs along the NSW coast. At the same time, development in catchments for housing, industry and infrastructure (e.g., roads) will increase with population growth. The damage will get worse unless we initiate plans to protect catchments and to monitor ICOLLs.

The Association is in the process of establishing a program to monitor the water quality of Saltwater Creek. The results of that monitoring may help to quantify the impacts of activities in the catchment. However, it is unlikely that our program will provide a basis for real-time management intervention. More broadly, there is a need for governments to review and upgrade existing erosion control measures and to actively monitor their effectiveness. The CMP should support this work.

We appreciate that ICOLLs might be outside the CMP's terms of reference, but that does not make the problems of runoff and pollution disappear. Importantly, such water bodies are an integral part of the coastal environment.

Beach infrastructure needs to be protected

Climate change and sea level rise will impact the Eurobodalla's beaches, one of the region's most important assets. Although not recognised in the draft CMP, beach infrastructure is also at risk of inundation. The CMP should help the Council to protect beach infrastructure, including carparks, pathways and community facilities. The CMP should also provide guidance on whether beach infrastructure needs be raised or moved to higher ground before it is damaged; and whether programs are needed to maintain dunes or to construct physical barriers to protect infrastructure.

Individuals need to be informed about options for protecting their properties

The CMP should help to manage the expectations of owners by presenting a clear position on options for protecting existing commercial and residential properties from beach or headland erosion. Governments will also need to develop strategies to inform owners of options to protect their properties, including associated costs and benefits.

With an active and supportive community, Rosedale could provide Council with a testing ground for identifying local threats, developing solutions and testing responses and performance measures. The Rosedale Association would welcome the opportunity to continue working with Council on the development and implementation of the CMP.

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