



Semaphore to West Beach Sand Recycling Pipeline

Submission

6th December 2021

1. At section 1.2.2, the DA discusses the DHI report and concludes “The DHI findings informed the Coast Protection Board’s recommendations to government for a long term solution to the problems at West Beach”. WACRA’s consistent message has been that CPB/DEW conveniently ignored DHI’s statement at page 22 of its report that it *did not consider in detail the economic, social and environmental consequences of its recommendations*. They have also failed to action one of DHI’s three recommendations in its report, viz “Further analysis of the long-term mass nourishment and large scale backpassing options is undertaken to evaluate the full financial, social and environmental implications of these options to provide a *long term, sustainable solution* to the management of the West Beach sediment cell.”
If that recommendation had been actioned, it is likely that a more comprehensive solution would have been arrived at and the community would be more likely to be supportive.
2. Section 1.2.3 of the DA notes that, in 2021, DEW commissioned an independent impact assessment by interstate coastal processes experts Salients and Coastal Environment (Salients and Coastal Environment, 2021). It claims that “The assessment included a review of previous assessments (including but not limited to DEH 2005, DHI 2018, Water Technology 2018) of shoreline changes and estimates of net sand movement of sand from West Beach through to Largs Bay. The report also assessed and advised of any risks associated with the construction and operation of the proposed sand pumping system. The assessment identified locations of sand accretion and significant erosion and advised which beaches would represent the best locations for sand collection (i.e. Semaphore South and Grange North) and sand discharge respectively (i.e. West Lakes Shore, Tennyson, Henley Beach South and West Beach)” The DA then concludes that the report “supported the construction of a sand pumping system from West Beach to Semaphore South and concluded that the system would enable a quicker response to erosion problems as they occur, reduce ongoing costs, reduce the impacts on resident and beach users and provide flexibility in responding to beach management issues.” In our email of 23 August 2021 to James Guy and the DEW team, WACRA pointed out the numerous shortcomings of that report and noted that “it would be wrong, now or in the future, for the report to be put forward as a proper response to the Scope Summary” (ie the brief given to Salients and Coastal Environment) and “The scopes of both the Phase 1 and Phase 2 Impact Assessments were expressly limited to exclude the analysis recommended by DHI and the consultants in both cases have failed to properly address even those limited scopes. Neither of those reports is, or should be represented as being, a fulfilment of the DHI recommendation.” The DA’s reference to the report in this section justifies WACRA’s concern about the credibility of the report and its anticipated misuse by DEW to support its pipeline strategy.

3. The pipeline has been seen as a solution to sand being carted and excavated by trucks and graders from the northern beaches, thereby reducing the impact on residents, beach users, flora and fauna. The problem is the pipeline ends at Pt Malcolm and it now becomes clear that sand carting will still need to be taken from as far north as North Haven using trucks and graders. It remains unclear as to how much sand will be required to support West Beach. What is clear is that, irrespective of the volume required, quarry sand will still be needed in the future to supplement sand erosion at West Beach. Whilst costings for purifying and carting quarry sand have not been finalised, it now appears clear the cost will be at least two and a half times that originally stated. Salients and Coastal Management have conceded that more detailed surveys, including the use of drones, will be required to more accurately assess sand shifting projections rather than rely on past surveys or previous environmental reports. This reinforces the need for an extension of time to conduct a full Environmental Impact Study and to allow the community to make informed submissions.

4. WACRA understands the many concerns expressed by individuals and resident groups about the DA and strongly supports the need for a greater period of time to consult with the community to allow them to understand the intricacies and implications of the DA and an extension of time to make a submission.