



WESTERN ADELAIDE COASTAL RESIDENTS' ASSOCIATION

SUBMISSION TO ADELAIDE BEACH MANAGEMENT REVIEW

9 June 2023

The Western Adelaide Coastal Residents' Association (WACRA) appreciates the commitment of the South Australian Government to the Adelaide Beach Management Review and, in particular, the involvement of the Department of Environment and Water (DEW), URPS and Bluecoast Consulting Engineers. We welcome the opportunity to make this submission to the Review.

WACRA has been in ongoing communication with Mr Chris Newby, the Project Manager of the Review and with representatives of URPS. On 15 May 2023, two members of the WACRA Committee participated in the workshop conducted by URPS. We are familiar with the information about the Review published on the DEW website.

Through those interactions and our previous correspondence and submissions, we believe that we have a sound understanding of the issues involved in the Review and that, reciprocally, the Review project team understands WACRA's position on the many issues in focus in the Review. Accordingly, this submission does not reiterate all of points raised in our previous submissions but makes some points relevant to the next stage of the review – ie the consideration of the published "long list" of sand management approaches and the culling of that list to arrive at a short list.

WACRA is aware of the on-line Adelaide Beach Management Review Survey and has actively encouraged all of our members to complete the survey to assist the project team in collating relevant information from residents.

Bluecoast Consulting

One concern of note is that the Bluecoast team, as described in the 15 May workshop, includes a person who, during the previous Government's pipeline project, made a presentation to the Community Reference Group as an avowed pipeline proponent. It was apparent that he considered the pipeline to be either the only or, at least, the preferred solution. Such an approach is not consistent with the role of Bluecoast to conduct an independent scientific review of *all* available approaches. WACRA seeks an explanation as to how that conflict will be managed so as not to undermine the credibility of Bluecoast's work.

Long List of Sand Management Approaches

WACRA considers that the published long list of sand management approaches appears to be comprehensive and we have no other approaches to add to it. Of course, the approaches are described in a very summarised form and the Review will need to expand on each of them significantly as part of the culling process.

WACRA considers that, with one exception, the “coarse filtering approach” (ie is the option effective/practical/acceptable) to be adopted by Bluecoast to cull the long list to a short list is appropriate. The exception relates to the part of the practicality assessment that asks: Does the owner have the financial capacity to deliver it?

We reiterate our previous requirement that the assessment of the available options must not be constrained by any pre-determined budget (or financial capacity) limitations. The Review must identify the combination of approaches that will deliver the best solution. The costing of that combination of approaches can then be assessed, along with the Government’s capacity to fund it.

If the Government decides it is unable or unwilling to fund it, that must be made clear and a decision can be made to adopt the second or third best combination of approaches – but the electorate must know exactly why it is not getting the best solution to the problem.

As part of the long list to short list culling process, WACRA considers that Bluecoast must provide detailed reasons justifying the discarding of each approach, by reference to the coarse filtering approach criteria. It will not be sufficient for there to be a mere statement that a particular option was considered not effective, or not practical or not acceptable. Detailed reasons for any such conclusion must be provided.

Removal of Existing Structures

One of the long list of approaches relating to “slowing or stopping sand flowing North” is “remove existing structures such as boat harbours and groynes”. WACRA was front and centre in the campaign to resist the original construction of West Beach boat harbour. Expert independent scientific analysis and informed community opinion clearly and accurately predicted the resultant damage to the coastline Northward of the boat harbour which this Review is now attempting to address.

The benefits which the harbour delivers to a small number of boat owners has come at an inestimable cost to the environment, marine life, dune-based fauna and flora and, over time, millions of beach-goers, residents and business-owners along the coast. The assessment of this approach must be seen in this context and must not be glibly dismissed merely because the harbour already exists. It is the root cause of many of the problems being addressed by the Review and its potential removal should seriously compare the loss of amenity to a relatively small group of boat owners with the potential benefit to the environment, marine life, fauna and flora, and a vastly larger segment of the population.

A further key consideration should be a detailed cost analysis comparing the potentially significant but one-off cost of removing the boat harbour with the large and ever-expanding cost of managing the sand replenishment which its continuing existence will require in perpetuity.

First Nations Peoples

WACRA notes with approval the appointment of Kurna representatives Ms Sarah Smith and Mr Les Wanganeen to the Independent Advisory Panel. We assume that they were selected because of their credentials, experience and expertise which will enable them to contribute to the functions of the IAP – namely, to oversee the Review, inform the Review approach, consult with the community and stakeholders, examine the outcomes of each stage of the Review and make recommendations to the Government through the Attorney-General.

But underlying the whole problem which the Review is seeking to address is a troubling and undeniable fact – the coastline, dunes and beaches which are the focus of the Review (along with the rest of the State) were never ceded by the First Nations traditional custodians – Kurna and others. Yet through the continued mismanagement of those lands by colonial, post-colonial and current authorities, they have endured cultural loss and damage which is inestimable but far exceeds the loss of amenity and financial loss experienced by current stakeholders which has led to this Review.

The Review presents an opportunity for those First Nations Peoples to be involved in decision-making about how the coast should be managed into the future.

WACRA hopes that the role of the Kurna representatives on the IAP includes consultation with the wider First Nations Peoples community affected by the Review and engagement with them in the processes of the Review. Assuming that is the case, we would appreciate an explanation of how that consultation and engagement is being undertaken.

Climate Change

In the presentation made by Bluecoast to the workshop on 15 May 2023, there is just one reference to climate. Amongst its Review Considerations was “3. What can be learned from the most up to date analysis of climate science”. This suggests that the Review is not attributing sufficient importance to the role of climate change in the future management of Adelaide beaches. WACRA considers that climate change (and, in particular, sea level rise and the increased frequency and intensity of storm events) should be a paramount consideration in the assessment of sand management approaches. It should be the context in which all approaches are tested.

In attempting to future-proof our beaches, the Review should adopt as its working assumption, the most aggressive estimates of climate-induced changes to those metrics. If it adopts conservative estimates at the lower end of the scale, it risks seriously and tragically underestimating the effects of climate change and overestimating the effectiveness of the suite of sand management approaches which it eventually recommends to Government. That mistake could jeopardise the viability of the Adelaide beaches for generations to come.

Modelling / Tank Testing

Bluecoast states that its methodology will be evidence-based. It will rely on data that includes wave data, satellite-derived shoreline profiles, beach surveys, detailed bathymetry and dune surveys and 2022 sand sampling. There is no evident reference to modelling of the various approaches.

WACRA considers that the effectiveness of particular approaches should be tested by scientific modelling. One example is the use of tank testing whereby the effectiveness of particular approaches is tested in scale models of the coastline and infrastructure. We understand that certain universities have this capability. For example, this technique could compare the effect of the existing West Beach boat harbour on the littoral movement of sand with the outcomes if the boat harbour was removed. Similarly, it could be used to assess the effect of installing various combinations of temporary groynes.

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