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Recognising and upholding excellence in local government

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To: Our Resilient Coast Team
Dr David Moore
Email: david.moore@sunshinecoast.qld.gov.au
Cr Taylor Bunnag
Email: taylor.bunnag@sunshinecoast.qld.gov.au

Dear David, Taylor and Team

RE: HEALTHY COAST MANAGEMENT PLAN AND SHORELINE EROSION MANAGEMENT PLAN 2025-2035

This email has been sent by the Organisation Sunshine Coast Association of Residents Inc (OSCAR).

The Organisation Sunshine Coast Association of Residents Inc. (OSCAR) is a non-partisan, not-for-profit umbrella/peak organisation covering resident and community organisations on the Sunshine Coast and Noosa Local Government Areas (LGAs) in South East Queensland.

OSCAR currently has over 35 member groups from the Pumicestone Passage to Noosa and from the Coast to the hinterland and ranges with these organisations having collectively over several thousand engaged and community minded members

The OSCAR overarching Vision states: *"The residents of this region enjoy being part of a connected and engaged community living in an area of outstanding natural beauty. They recognise that they are custodians of the unique and abundant biodiversity, beaches and green spaces of the region."*

OSCAR aims to support member organisations by:

- 1 Advocating to local and state government and the public on policy issues that are of regional significance and of concern to our members
- 2 Acting to resolve issues of strategic or region-wide relevance that are referred by member organisations
- 3 Representing the member organisations on region-wide matters of interest to the community
- 4 Maintaining awareness and responsiveness through frequent and regular ordinary meetings and dialogue with member organisations; and
- 5 Practising professional, honest and ethical conduct.

OSCAR wishes to register its concern to SCRC that the Healthy Coast Management Plan consultation and the Shorebirds Conservation Plan are probably 2 of the most important issues (apart from the Planning Scheme) facing the Sunshine Coast Local Government Area (LGA) over the next decade and beyond. The

Healthy Coast in many respects is the reason for the nature and popularity of the Sunshine Coast LGA. It is also a contributing factor to the designation of the Biosphere by UNESCO.

As neither of the TLPIs running almost concurrently with the Coastal Management Plans were urgent and could have waited until after the Coastal Management consultation had been concluded, then OSCAR and its member groups would have been able to run workshops based on the topics and issues, thus being better informed.

HEALTHY COAST MANAGEMENT PLAN

INTRODUCTION

The Organisation Sunshine Coast Association of Residents Inc. (OSCAR) congratulates Sunshine Coast Regional Council on the development of the Healthy Coast Management Plan.

OSCAR members appreciate the opportunity to comment on the Plan and do so with a sense of goodwill and a willingness to collaborate with Council in the implementation of the Plan when confirmed.

OSCAR offers its full support to this initiative of Council. Any comments made are in the interests of enhancing the already outstanding work undertaken in producing this document.

OSCAR comments relate to the Strategic Sections of the Plan. OSCAR has left comment on the individual Coastal Units and the related actions to our member groups to progress.

We commend and offer our support to the submission made by Caloundra Residents Association.

Part 1 The Healthy Coast Context

Sunshine Coast Biosphere

Being recognised as a UNESCO Biosphere reserve and maintaining this credential is our region's commitment to create a positive legacy for future generations. Every resident, visitor, business, and government entity has a key role to play in maintaining and enhancing the Sunshine Coast Biosphere reserve for our children, grandchildren and all those who will enjoy the prosperity, beauty and liveability of our region into the future. (P2.)

The Biosphere designation by UNESCO sought by Council must be the key element of our management of the Coast and associated environments. As with the listing of relevant United Nations Sustainable Development Goals (UNSDGs) in the following section, key commitments relevant to the biosphere designation should be listed here. For example, this management plan provides the opportunity to further the objective of managing economic and human development which is socio-culturally and ecologically sustainable.

The UNSDGs has been voluntarily adopted by Council while the biosphere designation required ongoing commitments and performance to maintain the designation, for example, the implementation of requirements of the "Statutory Framework of the World Network of Biosphere Reserves" within land-use planning projects.

If Council management plans do not demonstrate high level integration of the Biosphere criteria and indicators, we should have the designation rescinded!

Sustainable Development Goals

We note and support Council aligning its coastal management to a number of United Nations Sustainable Development Goals as stated:

“The United Nations Sustainable Development Goals (UNSDGs) for peace, prosperity, people, and planet provide a comprehensive and internationally recognised framework for us to collectively align the way we each live, work, learn and play every day – and form an important foundation of the performance measurement framework of our Biosphere. Council is demonstrating regional leadership by committing to embed the UNSDGs in our strategies, plans and associated progress reporting.” (p3)

Section 2 About the Coast

This section is informative in understanding the physical makeup of the coast, and the need to find a balance in our use of the coast, which OSCAR endorses.

As we deliver a Healthy Coast as part of a sustainable and liveable Sunshine Coast, the community has shared that there is a need to find a balance. This balance must manage the competing needs and desires of individuals, communities, businesses, and industries, and meet the social, economic, and environmental needs of the present without compromising the ability of future generations to meet their own needs. (P 8)

We do recommend either an overlay to Figure 1 or table indicating the extent of each coast unit that falls within the conservation, buffer or transition zone of the Biosphere.

Section 2.1 A Changing Coast

Figure 2. *Time line of the Coast* (p9) includes a collection of significant events from 30000 years ago to the present. We need to keep this table in mind and in view and both appreciate it and learn from it.

Section 2.2. Healthy Coast Values

Environmental Values

Our coastal environmental values are foundational to the character and identity of the Sunshine Coast, contributing significantly to the region’s economy, sustainable use, and community connections. This is supported by a local community survey which found ‘natural ecosystems and wildlife’ and ‘unique landscape features and natural beauty’ were the most important values for 67% of respondents. Clean, debris-free, and non-polluted environments were values that also featured prominently. (p10).

OSCAR believes that again this is a statement to which all groups in Council are aligned.

We suggest that the following additions might be made in parts of this section:

- *Table 2. Listed coastal species recorded on the Coast under the Nature Conservation Act 1992 (NCA) and/or Environment Protection and Biodiversity Conservation Act 1999 (EPBC) – add threatened ecological communities such as the Littoral Rainforest and Coastal Vine Thickets of Eastern Australia provisions under the EPBC Act.*

Built Asset Values (p14)

- *Open Space (p15) - Dog walking is one of the most popular activities to occur in the Coast’s open space areas. The Coast provides designated beach locations for on- and off-leash dog walking. These areas are managed by regulations that aim to protect the community and wildlife by ensuring dogs are safely and appropriately controlled.*

OSCAR suggests that reference be made to the Dog Exercise Area strategy currently being developed by Council.

- *Tourism (p17) - The Sunshine Coast region is a high profile and popular tourist destination, with tourism forming a key part of the region’s economy. Data from Tourism Research Australia estimates*

*there are over 4.1 million domestic visitors each year to the coastal areas on the Sunshine Coast. Data from the national annual survey of travellers, summarised by Tourism and Events Queensland, found that “going to the beach (including swimming)” was one of the top three Queensland tourist activities. **This strongly indicates that a healthy coastal environment is critical to supporting the region’s important tourism economy.** Economic activity continues to flourish, with a multitude of hotel accommodation choices, diverse dining options, and local tourist attractions benefiting from the high levels of visitation by residents and tourists enjoying the Coast.*

OSCAR suggests that this commentary supports strongly the concept of managing our coast sustainably, particularly in relation to height relaxations on the coast and the implications for endangered fauna.

Sustainable Use (P19)

The Coast offers one of the region’s most popular areas for social and recreational use. A growing population and an influx of people visiting the Sunshine Coast will place increasing pressures on how we access and use our valued coastal areas in a sustainable way. Commercial businesses and activities contribute to the Coast’s community vibrancy by activating open spaces and providing services that are not typically provided by Council. It is important that the potential pressure to increase the provision of these commercial activities, such as kiosks, cafes, and surf schools in the Coast’s open space areas are managed to ensure they do not impact on the social or environmental values of the Coast

OSCAR suggests that these issues should be managed carefully via the new Planning Scheme.

3. Pressures on our Coast

3.1 Population Change – OSCAR appreciates that the Sunshine Coast Enterprise Corridor runs from the Airport to Aura however reinforcing a statement that residential growth will occur in and around the Sunshine Coast Airport runs against Council’s own planning outlook (emerging Town Plan), declaration of the Blue Heart initiative and current concerns around development on flood plains. A more nuanced set of words are needed.

3.2. Climate change

OSCAR suggests that in para 3 page 20 that the term “man-made” be replaced with “Human-made”. There is also an opportunity to ensure this part of the plan is seen as up-to-date by referencing the Bribie Island breakthrough and challenges it will have on Pumicestone Passage and surrounding systems, both natural and built.

The reference to 0.8m should be sourced via a footnote to the CHAS which states “Government mandated sea level rise factor of 0.8m by 2100”.

Part 2 Healthy Coast Management Plan

The information contained in this section of the report is a straightforward and interesting account of the geological and human history of the Coasts’s evolution – from 30000 years ago to the present. It is something that we encourage all groups in Council and the wider community to read. It is something that we all need to keep in mind and learn from.

Section 2 – Governance framework outlines the approach taken by the council and in particular the Guiding Principles it espouses and their application. However, both Council as an organisation and the community as a whole does need to be particularly and deliberately conscious of all the Guiding principles and in particular Guiding Principle “Balance”.

Balance - Balancing the environmental, social, and economic needs of today, without compromising the ability to meet the needs of future generations.

Sections 3 and 4 - Coastal Management Responsibilities and Functions provides a detailed and

comprehensive account of Council responsibilities and actions in this area. The provision of links to each of the actions is an excellent approach making it easier for community members to understand the roles and extent work of Council. We commend Council for this initiative.

Section 5 - Coast Management Units - The Coast extends from Coolum Beach in the north to Bribie Island and Pumicestone Passage in the south.

Coast Units and Segments have been established to enable clear communication of current and future management along the Coast. The Coast Unit extents are based on existing suburb boundaries and coastal landforms (predominately headlands or estuaries). A total of 38 Coast Units are identified along the open beach, estuaries, and coastal lagoons. Each Coast Unit is further divided into Coast Segments, based primarily on landform, existing coastal defences, or land use changes. Figure 3 and Table 1 display a map and summary information on the Healthy Coast Management Plan Coast Units and their associated Segments located along the extent of the Coast. Council's Environment and Liveability Strategy, Coastal - Hazard Adaptation Strategy, Shoreline Erosion Management Plan, and Coastal Health Report all utilise Coast Units that align to this plan (P9-11).

This approach allows people living in different areas of the coast to focus on their part of the coast. This is a welcome approach.

Section 6 - Management of the Coast - Coast Units and Segments

Although a detailed analysis of each unit and associated segments is provided, (Description, Key pressures. Management Statement and Management priorities and a Coastal health score is welcome information, OSCAR has concerns about the methodology for determining the scoring in the Coastal Health Report.

The draft plan relies heavily and appropriately on the 2023 Sunshine Coast Coastal Health Monitoring Program to allocate a health score for each coastal precinct. The health score is based on assessment of three condition elements including water quality, biodiversity and public benefit. For almost half of the precincts the biodiversity score is less than 50%, yet the health score is still good to fair. This appears to be because of the weighting towards public benefit. There is no discussion of how the weighting of the three conditions is applied or what the 'tolerance' is.

OSCAR suggests that a level of tolerance for a poor biodiversity score should be set so that the management actions do not ignore the need to enhance biodiversity. This is particularly apparent for many of the beach precincts. For example, Wurtulla Beach has a biodiversity score of 44 % and still achieves a 'good' health score of 78%, and Mooloolaba Beach has a poor biodiversity score of 39% and a fair health score of 59%. It would appear that simple "averaging" of the three components, biodiversity, beach and buffer and public benefit. This is the simplest of arithmetical calculations in forming a single representative figure. There does not appear to be any weightings applied.

We suggest it would be beneficial to highlight biodiversity at beach precincts as key concerns and identify key actions to enhance biodiversity in these areas.

It is important that the performance of this management plan is measured through regular monitoring and reporting. The Coastal Health Report states that monitoring and reporting will be repeated every 3 years. As monitoring for the current report was conducted over 2019 and 2020 this monitoring program should be currently underway and in fact is due to be completed this year. We ask Council to ensure that the report is released to the public on receipt of the report.

SHORELINE EROSION MANAGEMENT PLAN 2025-2035

Volume 1

Consider separating Appendix A as a separate report located with other supporting documents. Other stand-alone reports are referenced in the SEMP without being attached.

2 Coastal management framework

Though possibly elsewhere within the Council, the SEMP framework would benefit from being structured along Environmental Management Systems approach with the formal identification of obligations relevant to the SEMP including legal (e.g. State Planning Policies and planning scheme), commitments made to third parties (e.g. UNESCO Biosphere designation) and voluntary commitments (e.g. UNSDGs).

The second part of the systems approach has been addressed well in the risk assessments for the coast units. These assessments should also be in the absence of controls such that the appropriate level of importance is identified and resources appropriately allocated.

Section 2.3 should relate to the Biosphere commitments with the UNSDGs becoming section 2.4.5.4 **Sea level rise**

OSCAR endorse the implementation of a risk-based approach as outlined in this section.

The section does not, however, include a conclusion following on from discussion of planning for sea level rise. Nominated probability levels and/or the relevant scenario(s) for different planning periods and risks with medium or high adverse consequences have not been made. After saying this, OSCAR considers such recommendations should commence with the CHAS.

Reference should be made to the CHAS in this section which states that “Government mandated sea level rise factor of 0.8m by 2100” was applied. The CHAS also referenced “sensitivity analysis utilising a 1.1m sea level rise factor to inform adaptation responses”. This increased level does not appear to be considered in the SEMP or Extreme Wave Study.

The section references IPCC recommendations from AR6 however omits a key assumption. Critically, AR6 expects a significant increase of accelerated contributions from the Antarctic with emissions above SSP2-2.6 levels. Notably, the quoted sea level projections referred to in section 5.4 are based on projections excluding such loss from Antarctica. As reported by the IPCC in AR6, modelling and understanding of ice sheet instability were not sufficient to provide a quantitative value of medium confidence. Instead, AR6 introduced two assessments to assist higher risk planning and/or long-term infrastructure being early modelling of marine ice cliff instability and structured expert judgement (SEJ). Further, to assist planning for significant projects expected to have a planning period exceeding 80 years, the IPCC also now recommend planning to 2150 and include such in their projections.

For context, the median projected sea level rise from the SEJ was a median of 88 cm increasing to 160 cm (83% probability). The SEJ assessment¹ included projected sea levels of 98 cm and 126 cm (83 and 95% probability respectively) for the now unlikely low emission SSP1-2.6 scenario as of 2100. As of 2150, projected sea levels increase further to 134 cm and 294 cm for the 2.6 and 8.5 scenarios respectively.

An objective of the Healthy Coast Management Plan is “Coastal management and planning is based on the

1 Bamber, J.L., Oppenheimer, M., Kopp, R.E., et al. (2019). Ice sheet contributions to future sea-level rise from structured expert judgment. *Proceedings of the National Academy of Sciences*, 116(21). Available at: <https://www.pnas.org/content/early/2019/05/14/1817205116>.

best available evidence". Applying AR6 projections, limiting future planning to a rise in sea level of 80 cm with reference to AR6 restricts applicability to actions and decisions where either:

- global warming is kept below 1.5°C
- a 50% chance of failure is acceptable, for example, low value infrastructure
- actions or decisions do not affect planning after 2100
- accelerated loss of ice from Antarctica does not occur (now considered to be highly likely).

The now inevitable significant increase in sea level is outlined in the IPCC AR6. While not generally critical to short-term plans such as the SEMP, the selection of long-term management controls requiring significant infrastructure must be cognizant of the planning window and probability of adverse sea level impacts need to be considered to minimise land use commitments later considered inappropriate. For example, the IPCC reports in WGI Chapter 9 Table 9.11 that even a highly optimistic response by national governments limiting warming to 1.8°C (scenario SSP1-2.6), there would remain a 17% of mean sea level exceeding 3.1m by 2300. As stated by the IPCC AR6, planning for mid-term sea level rise is not a matter of "if" but "when".

Where more adverse consequences may result and a greater exceedance probability is demanded in the mid-term, more appropriate sea levels should be considered.

As indicated above, we believe the CHAS is the more appropriate report for this discussion. The CHAS includes the following triggers to update the CHAS (section 7.1):

- any changes in the science/policy environment (e.g. sea level rise predictions, approach to defining coastal hazard areas)
- updated technical information that may be available
- any rapid environmental change imposing limitations on current preferred adaptation pathways
- any changes in community attitudes and risk tolerance.

While the breakthrough at Bribie Island has triggered an update, the upwardly revised projections from the IPCC or the ongoing community concerns have not resulted in an update.

CONCLUSION

Again, we thank you for the opportunity to participate in this consultation and congratulate the teams responsible for developing these plans for the integrated manner in which these documents have been prepared. We also appreciate the extension of time allowed us to respond.

Yours sincerely



Melva Hobson PSM
President OSCAR

Organisation Sunshine Coast Association of Residents