10th May 2023

The General Manager Glamorgan Spring Bay Council 9 Melbourne St Triabunna, TAS 7190

RE: Representation opposing 155 Rheban Road Development & Rezoning Application

As a permanent resident of Spring Beach, I urge Council to reject the proposed rezoning and subdivision at 155 Rheban Rd. According to the Flussig Report provided in the development application, "significant flooding occurs through the proposed development area." This was demonstrated in the 2022-23 flooding events experienced by residents at Shelly Beach. There has been considerable evidence Australia-wide that during La Nina cycles the frequency and intensity of extreme rainfall events increases, resulting in severe consequences for residents of flood-prone areas including uninsurability and expensive relocation. The application relies on outdated climate change research (dating from 2012) which understates the current risks of flooding. The application also places too much weight on flood mitigation measures at the expense of sustainable development practice. Placing 90 new residences on a site at high risk of inundation exposes the community to risk to life and property and Council to legal liability and future expense.

The Flussig Report notes (page 11) the post-development model "does increase the accumulative net discharge inside the existing watercourse," for both the East and West parts of the development. A 1-in-100 year flood event would lead to storm water discharge of approximately 1.87 tonnes per second. Given that we can no longer rely on these events being rarities, the severity of this impact should be of grave concern to Council. The authors of the CSIRO's 'Climate Change in Australia' report (updated December 2020) have high confidence that "extreme rainfall events will become more intense." Council cannot afford to base a major planning decision on the out-of-date data provided with this application.

There are significant infrastructure and environmental constraints on this site, including storm water runoff exacerbating the already high risk of coastal erosion at East Shelly Beach. The developer's failure to address section C10 of the Tasmanian Planning Scheme means Council cannot have confidence in the claim that there are 'no environmental constraints' on the site.

The well-publicised extreme flooding events nation-wide over the last 18 months place additional responsibility on Councils to ensure development decisions are based on best practice, independent advice and up-to-date climate change research. For these reasons, I urge Council to reject the proposed rezoning and subdivision at 155 Rheban Rd.

Sincerely,

Sue Hawkins
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