

Code	Page / Section	Topic	Issue	Suggested changes	General Comments	Response
C001					Great 4WD beach great for tourism and fishing. Huge reason why we and my extended family have all bought houses in this area	Further consideration of the local coastal processes, design and costs is required before these recommendations can be progressed to seek and confirm funding, undertake environmental impact assessment and finalise approvals/endorsement. It is recommended that further localised engagement takes place through this process, including with local community members so that sustainable long-term options appropriate to the local community values can be implemented.
C002					It is extremely disappointing in this current age, and with an Aboriginal and Torres Strait Islander voice to federal parliament imminent that no cultural acknowledgement to country is located at page 1 or 2. As a place-based location specific research project focused on the land and waters of the Southwest region of Western Australia [WA], the failure to acknowledge the traditional custodians who have cared for this region for thousands of years is a major failure in the PNP organisations approach.	<p>We apologise for this oversight - edits have been made to the document to include an acknowledgement. Edits have also been made to location details, and the location and nature of Higgins Cut.</p> <p>As this is a subregional study, the location of the sites of individual assets has not been presented for any of the nine asset classifications, including Aboriginal Heritage. Summary notes are provided in Section 4.4.</p> <p>Notwithstanding, Aboriginal Heritage Values were considered, and local Aboriginal Elders engaged through the project to seek information, knowledge and to obtain feedback on management options. It is recommended that further localised engagement takes place through the implementation of the CHRMAP into greater detail for specific nodes, including with local Elders so that continued recognition of the values of the area can be maintained, recognised and elevated.</p> <p>Despite the large extents of land projected to be subject to coastal inundation, vulnerability analysis suggests coastal erosion is a larger issue in the Shire. As emergency evacuation planning relates to addressing inundation vulnerabilities, it is further down the list.</p>
	2.1 Purpose, page 12				Paragraph one, the steering group consists of "City of Bunbury, the Shires of Capel, Dardanup and Harvey, WA Department of Biodiversity, Conservation and Attractions (DBCA), and the Southern Ports Authority (SPA), with support and technical advice from Department of Water Environment and Regulation (DWER), Department of Planning Lands and Heritage (DPLH), and Department of Transport (DoT)." Although these groups contain their own cultural guidelines in interactions with the traditional custodians of this region why has the South West Aboriginal Land and Sea Council https://www.noongar.org.au/ not been included in this steering group?	
	2.1 local context, page 13				Before colonial history was Aboriginal and Torres Strait Islander custodianship, any location details provided here in this section should begin with these details. Coolupup (Capel) is located in the Gnarlal Karla Boodja region of WA and the traditional owners of this land are the Noongar nation. To focus purely on colonial details is disrespectful to the residents of this community and as you are aiming to improve the future lives of residents in this region you should be acknowledging all of them and their ties to country.	
	3.5 Summary of Coastal Hazard Assessment Outcomes, page 25				You refer to Higgins Cut in the MU-1 Peppermint Grove summary, although when looking at the maps in this document that you have provided there is no map representing the location of Higgins Cut. In addition, you do not refer to Higgins cut as a man-made structure from past colonial practices.	
	4.3 Community Values Engagement Process, page 28				"Direct engagement with Traditional Owners and Indigenous representatives" If you did indeed liaise with Noongar owners it confounds me that the PNP organisation has not provided any cultural acknowledgement to this document or cultural connection to the location of this project.	
	8.1.1.3 Compulsory Acquisition, page 55				Why have you not mentioned acquisition of cultural heritage sites through the Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (ATSIHP Act) which enables the Australian Government to protect cultural heritage under threat, if state or territory laws have failed to protect it. In addition, why have you not located these sites as you have located residential sites which will be impacted by future events.	
	8.4.2 Further Investigations, page 65				You have listed seven further recommendations. I suggest prioritising these with: 5. Emergency evacuation planning. Being the first due to the service currently not being appropriate for an immediate response.	

					In summary, I commend the Shire of Capel in being proactive to the facts and experiences of climate change. It shows regard for our community and a regard for the safety of our residents. However, as you have read, I have been discouraged by the PNP organisations lack of respect for the traditional owners of Coolingup through brief reference to broad areas of "Aboriginal heritage" and no acknowledgement of who the organisation liaised with.	
C003	Section 8.2 and Table 8-1				"Error! Reference source not found..."	Edits made to document.
C004					Sea-weed and sand movement over the past 15 years from efforts to fix the Port Geographe problem, and its effect on the Shire's beaches, is but one small example of what can happen when works are not coordinated. 1. Can this point concerning un-coordinated works and the need for coordination be made in the executive summary?	Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required before implementation of adaptation options on the ground. We note that there have been some concerns on the methodology, the hazard maps, and what it means for the Capel community in terms of implementation, which is understandable. This is the reason why public consultation is a key component of any CHRMAP project, so that issues can be identified and hopefully by working together, sustainable solutions can be planned. The methodology prescribed by SPP2.6 has been used to come up with a conservative allowance for coastal hazards so it can be used to identify vulnerable assets and plan for their adaptation. The method is not structured to come up with the best estimate of shoreline position at a given timeframe. The process is based upon the best available data and represents a conservative estimate which includes allowance for uncertainty. In order to refine coastal hazard allowances, the CHRMAP data collection and investigation recommendations (including geotechnical investigation) can be implemented. Other implementation actions are trigger based, which the coastal monitoring can assist with. In summary the CHRMAP has been completed using best, currently available information. The purpose of the project is to conservatively identify an allowance for coastal hazards and to allow identification of vulnerable assets in order to inform future planning and risk management. High-level concept design work has been undertaken to allow budget estimates. Further consideration of the local coastal processes, design and costs is required before these recommendations can be progressed to seek funding, environmental impact assessment and approvals/endorsement. It is recommended that further localised engagement takes place through this process, including with local community members. Targeted responses for some of the detailed points raised are addressed below, others are acknowledged and will be considered in future coastal management, but are considered outside the consultant's scope of work for this project: *Local river flows were incorporated into the numerical modelling *Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines. *Erosion allowance lines are mapped from the Horizontal Shoreline Datum identified in Appendix B
					Some 7 years ago I was informed by a prominent scientist attached to the Peron Peninsular group, (which I might add then covered the coastal area from Busselton to Mandurah), who stated unequivocally that no decisions should be made on any works until the first basic step of completing a seismic survey of the coast to ascertain rock type had been undertaken. In response to my question at the Dalyellup meeting on this matter it is difficult to accept the answer that this basic seismic requirement is needed but is too expensive however is worth considering for small portion of the coast. 1. Because the presenter agreed that a seismic survey was an essential (first) step can this be included in the executive summary? A seismic survey as a basic first step in offshore areas should, in my opinion be a State/Federal funding responsibility.	
					It is disappointing to note that only 28 community members participated in and provided feedback at the initial teleconference sessions out of a population of 60,000-80000. These responses appear to have played an important role in developing the Multi-Analysis summary numerical chart that formed the basis for identifying the coastal values and future works. A comment made at the meeting suggesting that the red indicators attracted a negative score because of cost rather than suitability to fix the problem is difficult to accept when there are many examples worldwide of built solutions to control water inundation, just to quote one, for instance is that offshore breakwaters are highly effective. 1. Can you please clarify in the report how the Multi-Analysis summary was developed? What weighting was attributed to the 28 responses received and what was the weighting attributed to other methods including State Government project directions'?	
					During the April 18 2023 briefing the presenter responded to numerous questions by stating that certain issues were nonnegotiable inclusions in the report due to State Government requirement/directions. 1. Can you please include in the executive summary exactly what nonnegotiable parameters were imposed on the Peron Peninsular Partnership by the State Government?	

					I note and accept that a study area was identified to fit with coastal areas however it is difficult to accept that water flow issues concerning the Preston, Capel and Sabina rivers were not considered. As an example the Capel River in its current location is manmade, previously it flowed through the wetlands on the east side of Peppermint Grove Beach residential area and flowed out through the Wonnerup wetlands. It was in fact navigable by small boats. 1. Surely this waterway that had existed for hundreds of years should have been considered as part of the study rather than just been ignored? It may well be a cost effective solution to the coastal hazard problem.	
					I understand the 2 kilometer levy bank on the Capel River (presumably both sides, 4km in all), of the river was a late inclusion following a request from a community member. At the April 18 meeting there appeared to be little prior consideration of the role the two floodgates, currently installed on the river, play in controlling tidal water flows from high tide surges and flows emanating from upstream during intensive rain periods. It is also worth noting that 2 kilometers from the ocean would probably extend the levee bank past Mallocup Bridge, for what reason I am uncertain, and could cause major inundation problems for houses in Stirling Estate, if it were to end abruptly near that location. 1. Have these alternative solutions been tested? Maybe a more cost effective option would be to install additional flood gate upstream above the existing surge barrier? Have you considered historical flood data on the Capel River and the installation of additional floodgates either above or below the surge barrier in arriving at the recommended course of action?	
					I have read with interest the suggested option for Higgins Cut. No doubt extensive studies have been undertaken in arriving at a solution to build a culvert over the now nonexistent waterway. The cut has an extensive history dating back to the mid-19 th century, it is located on private property and is listed on the Register of Heritage Places. 1. Can I suggest that the authors of CHRMAP read the Heritage Assessment document on Higgins Cut, if they have not already done so, and re-consider if the culvert is in fact a workable option and what purpose it would serve?	
					To say I am surprised and disappointed at the chosen financial option would be an understatement. Global warming was not and is not caused by the 154 owners of properties in Peppermint Grove Beach nor the 64 owners of properties in Dalyellup that may be subjected to a an additional annual levy for the privilege of having their properties fall into the ocean. Global warming is a problem caused by mankind and we are all responsible and should pay our dues.	
					1. Is the proposed annual financial contributions on just a few properties the preferred funding option if so spell it out in the executive summary?	
					2. If the proposed levy is a State Government preferred option/direction as suggested at the April 18 meeting say so	
					3. Can you spell out in the executive summary what benefit the affected owners of the identified properties will receive from paying the annual financial contribution/ special levy?	
					4. Will the payment of the levy by affected owners guarantee that their properties will not fall into the ocean?	
					5. If properties are to be resumed what mechanism has been established to value the properties?	
					6. Will Local Government face any future liability for having approved subdivisions in various locations within the Shire and then walking away from their role to provide and maintain infrastructure to maintain those sub division developments?	
					7. Did the authors of the preferred funding option consider the ground breaking precedent it may have on how Local Government raise revenue in the future? Will the user pays/beneficiaries pays principle now apply to all or many aspects of future Local Government funding?	
					8. Can consideration be given to recommending that every ratepayer/property owner in Western Australia pay an annual levy administered by the State Government and collected through Local Government to fund global warming initiatives? The Emergency Service levy is an example and current working model where everyone shares responsibility for a communal disaster response.	
					9. Is the current funding model presented/suggested is just another blatant example by the State Government of cost shifting?	
					10. Has the green line drawn on the map representing the expected 2120 sea rise levels been drawn with any degree of accuracy? Assuming a .9 meter rise in sea levels the green line should be approximately 100 meters from a particular landmark, either the primary or secondary dune or high or low water mark? What mark was used in arriving at the line on the map as the line in various locations in Peppermint Grove Beach seems to vary from between 140 – 150 meters from the primary dune which incidentally is located a further 20-30 meters away from the ocean?	
					May I say that the hard copy document that was provided on April 18 together with various appendices that have had to be read online has made the task of responding to the “Draft”CHRMAP difficult particularly given the short response time for comment? Local Government in partnership with the Peron Naturaliste Partnership should at the very least organise public displays in shopping malls, and public places such as libraries etc., similar to what happened in the City of Busselton, to better inform the public and to get positive support for global warming responses, a matter that is not going away.	
					In conclusion I am fully supportive of the earlier mentioned possible soft option recommendations involving dune regeneration and sand replenishment where required.	

C005					<p>The Satterley Property Group, in partnership with the Housing Authority, are developing the Dalyellup Beach Estate in the Shire of Capel. This long-running project commenced in 1998 and the Dalyellup Beach Structure Plan (DBSP) is now into the final stages, including the last stretch along the coast.</p>	<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required before implementation of adaptation options on the ground.</p> <p>We note that there have been some concerns on the methodology, the hazard maps, and what it means for the Capel community in terms of implementation, which is understandable. This is the reason why public consultation is a key component of any CHRMAP project so that issues can be identified, and hopefully by working together, sustainable solutions can be planned.</p> <p>The methodology prescribed by SPP2.6 has been used to come up with a conservative allowance for coastal hazards so it can be used to identify vulnerable assets and plan for their adaptation. The method is not structured to come up with the best estimate of shoreline position at a given timeframe. The process is based upon the best available data and represents a conservative estimate which includes allowance for uncertainty. In order to refine coastal hazard allowances, the CHRMAP data collection and investigation recommendations can be implemented. Other implementation actions are trigger based, which the coastal monitoring can assist with.</p> <p>In summary, the CHRMAP has been completed using best, currently available information. The purpose of the project is to conservatively identify an allowance for coastal hazards and allow identification of vulnerable assets, in order to inform future planning and risk management.</p> <p>High-level concept design work has been undertaken to allow budget estimates. Further consideration of the local coastal processes, design and costs is required before these recommendations can be progressed to seek funding, environmental impact assessment and approvals/endorsement. It is recommended that further localised engagement takes place through this process, including with local stakeholders and community members.</p> <p>In regards to the CHRMAP undertaken by MP Rogers and Associates, and completed as part of Amendment No. 14 to the Dalyellup Beach Structure Plan, there are differences in the erosion hazard mapping between that report and the Capel – Leschenault CHRMAP. There are several probable reasons for these differences, due to various data inputs, including;</p> <ul style="list-style-type: none"> •Horizontal Setback Datum (various beach/topographic survey, metocean analysis); •S1 (storm sequences, bathymetric and beach surveys, profile locations); •S2 (historical vegetation lines selected); and •S3 (differences in exact SLR value used) and planning timeframes used. <p>The determination of the above variables is made at a point in time and in the context of the CHRMAP. For the Capel to Leschenault CHRMAP, Water Technology made these decisions considering the subregion extent under analysis. MP Rogers and Associates likely made these decisions considering the significantly smaller study area.</p>
					<p>Although this is a long running project, this area along the coast was reconsidered in detail as part of Amendment No.14 to the DBSP, with approval gained in 2020. The purpose of DBSP Amendment No.14 was in direct response to various, contemporary environmental considerations. This included detailed Coastal Hazard Risk Management and Adaptation (CHRMAP) analysis and planning undertaken by MP Rogers & Associates. On this basis, stages here are now under construction with the next tranche of stages about to be lodged for WAPC subdivision approval. These final stages of the DBSP include the much anticipated and desired connection of Dalyellup Boulevard north, to connect to the existing road network, and creation of a new Surf club / Community purpose lot, as well as conservation of Foreshore Reserve and Conservation habitat, including land recognised at a Commonwealth level under the Environmental Protection and Biodiversity Conservation Act (EPBC). Importantly, DBSP Amendment No.14 demonstrates an agreed 100-year CHRMAP horizon. It is not fully clear from the information available; however it appears this approved 100-year horizon is slightly different in this new advertised CHRMAP, extending further east. This is very concerning with considerable negative perception and implication.</p>	
					<p>In review of the Capel to Leschenault (CTL) CHRMAP, and unlike other existing local CHRMAP's, recognition and relationship to this approved DBSP CHRMAP is not evident. Appendix A at 5.3 of the CTL CHRMAP lists various Local Planning Strategies, Schemes and Plans. As well as there being other relevant documents absent from this list, it does not list the DBSP or the DBSP CHRMAP or the existing DBSP Coastal Foreshore Management Plan. Is the Peron Naturaliste Partnership (PNP) and the project group, including the lead consultant Water Technology, aware of the approved DBSP (Amendment No.14), and most importantly, the DBSP CHRMAP? If not, why not? If they are, can further details please be provided to demonstrate how the conclusions in the DBSP CHRMAP have been considered, and how the conclusions reached compare, align, or differ between the DBSP and the CTL CHRMAP's and why? Ideally a map which shows the 100-year line accurately, overlaid with the DBSP CHRMAP is required. For the DBSP, a government decision has already been made in context of a Structure Plan and CHRMAP about anticipated residential development, and we request the CTL CHRMAP and the recommendations as they pertain to Dalyellup be based on this.</p>	
					<p>At a broader level, and whilst the necessity for community and Government understanding and planning for coastal hazard and climate change in general is not disputed, there is detailed knowledge absent in the CTL CHRMAP and this creates concern about its voracity. It appears the scope of the problem to be addressed is not yet fully understood yet solutions are set out and costed.</p>	

					We regularly work closely with the Shire of Capel and the Department of Planning, Lands and Heritage (DPLH) on Dalyellup matters but it is curious we have not been engaged with, or at minimum consulted with through these pathways, or ideally direct with the PNP or Water Technology representatives on this important matter.	
					Concerningly, the recommended actions of the CTL CHRMAP have genesis in limited community consultation, including direct engagement with impacted landowners. The number of survey responses and workshop participants compared to population and/or impacted people and landowners, is way too limited, and is not considered statistically valid. It is alarming that discussion with only a handful of individual community representatives is the basis for preferred actions.	
					The solutions set out are generic and the true feasibility of all the intervention options available do not appear to have been thoroughly investigated. The costing of these solutions also appears unduly if not prohibitively aligned to individual landowners. Climate change has been created by society as a whole and these beaches and foreshore areas are public assets available to the whole community.	
					The CTL CHRMAP is silent on what happens next, lacking any reassurance or direction to those impacted about how this information will be used.	
					For a shared environmental project across a large stretch of coast with many government agencies involved, it is concerning this exercise does not include an overarching strategic view. There are no actions and/or responses that leverage from and address principles of environmental and economic sustainability, ideally for net community benefit.	
					The recommendation in Table 8-1 to prepare a new Special Control Area and Local Planning Policy over Dalyellup is opposed. These actions lack any strategic planning basis, which is the essential first step to initiate such action. For new development, particularly subdivision, our view is that this is sufficiently dealt with by the existing planning framework including the DBSP.	
					This exercise appears largely desktop around existing knowledge without detailed new, meaningful, site specific data and analysis. Whilst there is quite a volume of material presented across many documents in the CTL CHRMAP, it lacks substance and comprises a lot of repetition. This does not make any of this accessible, including to the community.	
					Some of the maps are illegible so impact in relation to property is not clear.	
					The 100-year coastal hazard line presented in this manner is confronting. Has direct notice been sent to individual landowners, including the residential lots in Dalyellup potentially impacted?	
					The lack of reference to historical coastal erosion, which is understood to be available back to the 1950's, has not been referenced. This history would appear to show limited coastal erosion along much of this coastline in the last 80 years, including in the last approximately 30 years when climate change and sea level rise has been accelerating.	
					Appendix 1 has considerable gaps. The CHRMAP does not demonstrate a thorough understanding of the existing planning framework and local context. For example the significance of Dalyellup within the Shire of Capel or its population and geographical composition more broadly for example is not acknowledged, or its context in the broader sub-region.	
					Dalyellup is the core urban area of the Shire of Capel, comprising majority of population and it is the only remaining coastal area south where residential expansion is planned for and has Structure Plan approval. Likewise, this stretch of the Capel coast is the most accessible and the most utilised by the community and the problem let alone solutions set out does not seem aligned with this importance.	
					The CTL CHRMAP does not appear to set out the impacts of manmade coastal disruption that exists and is planned for in Bunbury. For example, the existing groynes and waterfront harbour activities in the Port and Koombana Bay areas, as well as broader Geographe Bay implications that may impact on natural coastal movements along the Shire of Capel coast. The Bunbury Waterfront CHRMAP information does not appear to be available.	
					In addition to the Waterfront project, an artificial reef and wave pillow are presently being pursued for installation in the City of Bunbury. Why is artificial reef ruled out in Table 7-1 as a possible risk treatment option?	
					The methodology for suggested management actions and their cost appears arbitrary and to grossly undervalue the impact and cost on landowners and the community impacted by the 100-year coastal hazard line.	
					The planning solutions set out discount and overlook importance of Structure Plans and CHRMAP's prepared through this process.	
					The weighting towards a Special Rate levy area (noting one already applies in Dalyellup) or acquisition of land if not existing homes is considered alarmist and unrealistic at this early stage, including within the next 25 years. It is not clear in the CHRMAP how solutions align with a 25 year as against 100-year outlook.	
					There are errors in Table 8-1. This table fails to recognise the existing land reservations and foreshore reserves that already exist, including in Dalyellup.	

C006				<p>predicted to rise at an increasing rate in the future (IPCC 2014). Rising sea levels and intensifying storm activity will increase the risk of coastal inundation (temporary coastal flooding), storm erosion and long-term shoreline recession". If the IPCC's sea level rise predictions of a rise between 0.95 and 1.1m by the end of this century, are as questionable as their global warming claims, one should study a range of scientific analysis before assuming any extent of climate changing claims. IPCC's political reasoning and support of Mann's 1999 Hockey Stick Graph depicting a dramatic rise in global temperatures, shouldn't be taken in isolation, but compared with the many equally researched reports that include the last 2000 years of fluctuating climate changes which gave us the Roman Warming (AD 1- AD 500), Cold Dark Ages (AD 476- AD 950), Medieval Warming (AD 950- AD 1250) and Little Ice Age (AD 1300- AD 1850).</p> <p>Water Technology via sub-consultant, Marsden Jacobs and Associates, has selected 'GROYNES' to manage beach erosion, even though not scoring positively in stage G's Risk Treatment Analysis. Pages 44-46 are confusing due to contradiction. Recommended option for MU1 and MU3 was Voluntary Acquisition however, 'second best performed' option (groynes), managed to be eventually selected in Section 7.2.1 page 47. Also included was mentioning of the 13 groynes for Bunbury's MU5.</p> <p>Of utmost importance is Capel Shire's President, Councillors and Executives full understanding of the key history behind Earth's climate and flawed logic behind groynes, together with ramifications, before deciding on solutions to Inundation and Erosion.</p> <p>The following local and international information should be considered as relevant when reading conflicting predictions and questioning groyne options to solve Capel Shire's Coastal Erosion problems.</p> <p>A study undertaken by the Swan River Trust in Western Australia (Potential Impacts of Climate Change on the Swan & Canning Rivers), concludes that sea level in the south west of the state will rise by 220 - 330mm in the next 20 years or so, 280 - 430mm by the Year 2070 and 350 - 550mm by the Year 2100."In September 2010 the WA Planning Commission updated the sea level rise value for use in coastal planning to 0.9m by the Year 2100. Apparently, this has the potential effect of increasing the horizontal set-back for a new development on a sandy coast to about 150m.</p> <p>Australia's CSIRO and the Bureau of Meteorology's 2015 document, 'Australian's Changing Climate', states "The average rate of relative sea-level rise for Australia from 1966 to 2009 was 1.4mm/year." American groyne field photo and data supplied By Coastal Care;</p> <p>"North Carolina law prohibits the use of groynes – steel, rock or wood walls built perpendicular to the beach in order to</p>	<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required before implementation of adaptation options on the ground.</p> <p>The methodology prescribed by SPP2.6 has been used to come up with a conservative allowance for coastal hazards so it can be used to identify vulnerable assets and plan for their adaptation. The method is not structured to come up with the best estimate of shoreline position at a given timeframe. The process is based upon the best available data and represents a conservative estimate that includes allowance for uncertainty, using sea level rise values, and allowances for erosion prescribed by the Department of Transport. In order to refine coastal hazard allowances, the CHRMAP data collection and investigation recommendations can be implemented. Other implementation actions are trigger based, which the coastal monitoring can assist with.</p> <p>It is noted that Managed Retreat by Voluntary Acquisition is the recommended management option to address erosion for MU1, MU2 and MU3. BDA Analysis consider Protection for MU3 as a case study, assuming groynes. Other aspects of the submission are acknowledged and will be considered in future coastal management, but are considered outside the consultant's scope of work for this project.</p> <p>High-level concept design work has been undertaken to allow budget estimates. Further consideration of the local coastal processes, design and costs is required before these recommendations can be progressed to seek funding, environmental impact assessment and approvals/endorsement. It is recommended that further localised engagement takes place through this process, including with local stakeholders and community members.</p>
				<p>figures bandied around the world regarding sea level rise, global warming and climate change, vary greatly, as do the range of suggested solutions. Local government stakeholders and decision makers cannot, therefore overlook logic, common sense and proven successful solutions to 'Inundation' and 'Coastal Erosion'. For that reason, it comes as a surprise to discover 'groynes' are the preferred option for addressing coastal erosion along the Western Australian coast, due to presumed rising sea level.</p> <p>Water Technology's Final CHRMAP satisfies the requirements for which it was commissioned however, it is not an easy read, particularly for the lay person who down loads. For example, Figure 1-1 on pg. 9 requires a magnifying glass while some of the colourful pages with white print on yellow background or yellow on grey, induces squinting before frustration. Similarly, the three Management Unit's legends on pages 25/26 together with maps, encourage the reader to pass over. Table 7-2, pg 46 in conjunction with Table 7-1's Option Codes, is confusing, especially when considered with the Cost Benefit Analysis Methodology, Benefit Distribution Analysis and three selected options in 7.2.1, pg 47. Pages 62-68 must also be appreciated fully even if they require re-reading.</p> <p>It's important 'decision makers' understand the message behind such paragraphs as the following:-</p> <ol style="list-style-type: none"> 1) "The Options have been selected based on information gathered through all the previous CHRMAP project stages. Although the Multi-Criteria Analysis and Cost Benefit Analysis have been key gateway decision points for selecting many Options. The preparation of the MCA and CBA required interpretation and approximations, particularly regarding the criteria and cost quantifications, and have limitations. Also, the proposed Options have been developed only at a conceptual level to draw comparisons between several Options." 2) "Sand source feasibility study – Several MU's have recommended Options which require sand nourishment, both for erosion management (such as beach groynes including sand nourishment) and inundation management (such as raising beach levels to improve coastal drainage). The availability of suitable sand for beach nourishment works is unfortunately not well understood in the study area." 3) "Cost estimates in this CHRMAP have assumed that a reliable source of sand in reasonable proximity to the study area may be available. If this assumption is incorrect, costs may increase and affect the CHRMAP recommendations." 4) "Rock source feasibility study – Similar to the above but for armour rock suitable for building coastal management structures. Several MU's have recommended Options requiring armour rock which needs to be fit for purpose." 5) "Providing temporary/interim hazard protection may also become more costly and a change in adaptation pathway 	

				<p>Fortunately for the Capel Shire, Groynes are excluded from CHRMAP's 'Short Term' (0-15years) recommendations. This allows for professional consideration and unhurried evaluation of all possible options.</p> <p>Not so with Bunbury's advised 30 rock groynes located in Management Units 4,5,6,7 and 8. As erosion control recommendations in the City's 'Short Term' Table, presumably they are to be constructed within the next 15 years. This poses a question regarding the suggested priority of groyne construction times in connection with the annual northerly migration of 80,000 cu ms of sediment, transported by the 'coastal longshore drift'. Each of Bunbury's ocean front groynes would have to be situated and allowed to saturate with sediment in an orderly and southerly direction, before that sand supply is cut off by more southern groynes. This particular issue has never been considered or reported on in detail. Before any further groynes are constructed on coastal beaches in the State's South West, far more research must be undertaken to prevent the introduction of imperfections and long term complications.</p>	
C007				<p>As someone following development of the CHRMAP over the last 2 years I am delighted to see the publication of the draft report for consideration by the community and Capel Shire. It is not before time we are taking seriously, recognising and planning proactive responses to our changing coastline and I commend the work that has been done to bring the report to this development stage.</p> <p>If, indeed, managing the response to this complex state-wide nation-wide, worldwide climate change impact is to be the responsibility of our Local Government, as State Government policy SPP2.6 requirements seem to suggest, we in Capel shire with councillor majorities persisting over several years on electorally popular minimum rates minimalistic budgets propped up by eating into reserves inattentive to future planning, are in no way financially ready.</p>	<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required including engagement with local stakeholders and community members, before implementation of adaptation options on the ground. Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines.</p>
				<p>I also am pleased to note that the draft report is proposed as an impetus for further essential research work. Throughout the draft it is constantly re-iterated the need for more research, more analysis, more monitoring. Perhaps some of the proposals, cost estimates and costing sources are somewhat premature and distractors from the fact that more serious work needs to be done.</p> <p>These research processes will be costly but essential to test the science and proposals and provide alternative suggestions to some which many locals question, such as the location and efficacy of a levy banks for the lower Capel river (with possible repercussions for further up river) or the place/need/cost of the Higgins Ct proposal.</p>	
				<p>As one of the people who attended the initial community meeting in 2021 and over the subsequent period 2 extremely informative (but minimally consultative)meetings of the CCG about some CHRMAP tools like the Multi Component Analysis I have been concerned over that time that the wider community has not been kept informed of issues and progress, with even those of us who attended the 2 meetings bound by confidentiality and to the extent that shire employees were not comfortable to discuss developments with us. Even the Council Sustainability Committee appeared to have had only a couple of brief briefings.</p> <p>As said in the report, community consultation is crucial to assessing values and to community ownership of any planning to deal with this vital issue. With a basic understanding of statistics, any reader of the section that straightforwardly reports on the numbers involved in required consultation, and indeed types of measures used (such as clicking to open the first page or the minimal number of likes on a Facebook meeting announcement) can see that misleading positivity re community involvement is not warranted. The community and the process have both let slip the goal of community involvement and ownership. Now this draft CHRMAP is available, perhaps the community will pay more attention.</p>	

				<p>limitations of this first draft report are imposed by compliance with governing State Policy SPP 2.6 . Examples include arbitrary geographical boundaries on locations reviewed (“coast”) cutting off contiguous relevant areas, time signatures for those magic coloured lines superimposed on the map, the level of risk defined as the next imminent rather than the exact risk at the dateline and prescribed hierarchies of response types for action. Additionally we now discover the recently added “basic principle” of an afore un mentioned and extremely woolly principle of User (i.e. the undefined and possibly undefinable “Beneficiary”) Pays.</p> <p>In a world where all have responsibility for contribution to climate change, not just the residents in the state defined coastal areas of Dallyellup, Stratham, Capel Coast, Peppermint Grove Beach and Forrest Beach , we are indeed all “users” who are paying. Those closest to the coast could be perhaps better defined as “losers” than beneficiaries, not just risking loss of of the amenity and security of their homes, but also financially through capital costs brought on by blanket (100 year risk possibility) title warnings the report suggests should cover the CHRMAP (arbitrarily defined) area.</p> <p>The suggested concept of “Beneficiary Pays” creates an interesting precedent for any Local Government works. It is a major governmental cost-shifting pitch? The CHRMAP and the consultant economists both express strong caveats that “defining beneficiaries” is difficult, if not fraught, especially since cost-benefit cannot be calculated on all options and many values.</p> <p>Any Local Council wading naively into assuming “User Pays” could be a convenient way of sourcing funding needs to be very conscious of the precedent they would be setting for all future works of the council.</p> <p>The mind boggles. Consider some similar scenarios. Would the State Government be suggesting that, to remedy the damage done by the recent climate change event/floods on the Fitzroy River, that adjacent landowners and native title holders are those who should finance the rebuilding of the bridge? Perhaps residents of Boyanup Road West, Hasties Road and other Capel Shire areas beneficiaries of recent works could have been defined as the first “beneficiaries” and footed the bill with a Special area Rate? .</p> <p>Any body adopting “beneficiary pays” had better be very confident that they could lawfully and specifically:</p> <ul style="list-style-type: none"> •Define the benefits to different Payers •Specify the role that “beneficiaries” have had in causing the works to be needed. •Be able to justify the cost-benefit/profit/loss balance for individuals not just universally allocate to all people with the same locality address. 	
C008				<p>Please be advised we do not wish to pay any levy for coastal erosion events that are predicted to take place 27 years then 97 years from now.</p> <p>If the council wishes to proceed with this then it should be part of a State wide approach to coastal erosion.</p> <p>And at the very least any levy should be shared across the whole of the Capel Shire, as the beach is not used exclusively by residents but also includes thousands of tourists each year, staying in holiday rentals and the caravan park.</p> <p>The development on the dunes and subsequent erosion risks has been exacerbated by long standing local government and environmental approvals for buildings very close to the shore, all of which have created wealth for those people in real estate and land development and problems for the long term environment.</p> <p>Allowing recreational vehicles to destroy coastal vegetation and destroy the dunes in the area just north of the river mouth is a further exacerbation of the problem and something that the council and the Water Corporation could prevent. I have previously written to the Capel Council about this concern.</p>	<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required including engagement with local stakeholders and community members, before implementation of adaptation options on the ground. Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines.</p>
				<p>With regard to Peppermint Grove Terrace as the sole access road for essential utilities, my view is that the utility companies using it should also be levied, eg Water Corp, Western Power, N.B.N, etc, because of that sole access.</p> <p>It is unacceptable to levy a single part of any community for events that have not happened. Climate change is real but it’s not something that we few local residents have caused or can control.</p> <p>If a levy was to be imposed the community needs to properly understand how that would be used to actually solve the predicted erosion issues or mitigate any risks.</p>	

C009				<p>RECOMMENDATION 1 The Shire of Capel should request that the state government review the 0.9 metre sea level rise prediction and, in the absence of evidence gained over the last 14 years, the government should assess whether the predicted sea level rise around the coast of south west Australia should be set at 0.38 metres.</p> <p>I accept the science supporting the concept of climate change and accept that various human activities are increasing CO2 levels in the atmosphere which, in turn, is causing global air and sea temperatures to rise. I also accept that it is sensible planning for the Shire of Capel to prepare a CHRMAP. However, there are serious flaws and problems associated with the CHRMAP:</p>	<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required before implementation of adaptation options on the ground.</p> <p>We note that there have been some concerns on the methodology, the hazard maps, and what it means for the Capel community in terms of implementation, which is understandable. This is the reason why public consultation is a key component of any CHRMAP project, so that issues can be identified and hopefully by working together, sustainable solutions can be planned.</p> <p>The methodology prescribed by SPP2.6 has been used to come up with a conservative allowance for coastal hazards so it can be used to identify vulnerable assets and plan for their adaptation. The method is not structured to come up with the best estimate of shoreline position at a given timeframe. The process is based upon the best available data and represents a conservative estimate which includes allowance for uncertainty, using sea level rise values and allowances for erosion prescribed by the Department of Transport. In order to refine coastal hazard allowances, the CHRMAP data collection and investigation recommendations can be implemented. Other implementation actions are trigger based, which the coastal monitoring can assist with.</p> <p>In summary, the CHRMAP has been completed using best currently available information. The purpose of the project is to conservatively identify an allowance for coastal hazards to allow identification of vulnerable assets to inform future planning and risk management.</p> <p>High-level concept design work has been undertaken to allow budget estimates. Further consideration of the local coastal processes, design and costs is required before these recommendations can be progressed to seek funding, environmental impact assessment and approvals/endorsement. It is recommended that further localised engagement takes place through this process, including with local stakeholders and community members.</p> <p>Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines. Other aspects of the submission are acknowledged and will be considered in future coastal management, but are considered outside the consultant's scope of work for this project.</p>
				<p>1.State Planning Policy no. 2.6 'State Coastal Planning Policy' was prepared in 2010 using temperature, sea level and atmospheric CO2 data generated in 2009. Much has happened in the intervening 14 years and the policy needs to be updated to take new data into account.</p>	
				<p>2.The IPCC's most recent report - https://www.ipcc.ch/report/ar6/wg1/chapter/technicalsummary/ -states: "By 2100, GMSL is projected to rise by 0.28–0.55 m (likely range) under SSP1-1.9 and 0.63–1.01 m (likely range) under SSP5-8.5 relative to the 1995–2014 average (medium confidence)."</p> <p>However, reputable climate scientists are now saying that the high emissions scenario variously called SSP5-8.5 or RCP8.5 is no longer credible, with global emissions of CO2 and other greenhouse gases increasing at a much lower rate. For example, the paper "Emissions – the 'business as usual' story is misleading" by Zeke Hausfather & Glen P. Peters (Nature, Volume 577, 30 January 2020) concludes "we suggest that climate-impact studies using models developed for AR6 should include scenarios that reflect more plausible outcomes, such as SSP2-4.5, SSP4-6.0 and SSP3-7.0".</p> <p>A number of other research papers agree that SSP5-8.5 is unrealistic and the rise in greenhouse gases and hence rise in temperature and sea level projected in this scenario will not occur.</p> <p>Accordingly, projected sea level rise by 2110 will not be 0.63 to 1.01 metres under SSP5-8.5 but will be closer to 0.28 to 0.55 metres as predicted by SSP1-1.9. Hence, the WA Planning Commission's estimate of 0.9 metres of sea level rise by 2110 is seriously unlikely and should not be used as the most likely outcome.</p>	

				<p>3.The document 'Sea Level Change in Western Australia – Application to Coastal Planning' produced by the WA Department of Transport's Coastal Infrastructure, Coastal Engineering Group was produced in 2010, prior to the release of State Planning Policy No. 2.6. It is referred in other state government documents as forming the basis on which State Planning Policy 2.6 is based.</p> <p>However, on page 17 of this document under Summary & Recommendations, the document states: The allowance for sea level change within the State Coastal Planning Policy is currently based on the prediction of the mean of the median model of the IPCC TAR between the years of 2000 and 2100. The policy gives the following guidance under Section D, Factors to be considered in calculating coastal processes setback: "The value given for each factor has been based upon the best available data, a conservative estimate of that factor and includes allowance for uncertainty." It is no longer considered that the current factor for sea level rise of 0.38 m fulfils this guidance. The document 'State Coastal Planning Policy' appears to be no longer accessible on the WA Planning Commission website. As a result, it is impossible to determine any of the factors used to arrive at the recommended sea level rise of 0.9 metres by 2010, including: A)The conservative estimate of the IPCC's prediction and B)The allowance for uncertainty which together explain and justify the increase in sea level prediction from 0.38 metres as stated by the IPCC to 0.9 metres as contained in Policy 2.6. Recognising that the extreme emissions scenario defined by SSP5-8.5/RCP8.5 is no longer considered likely, there is no justification for believing the IPCC's 0.38 metre sea level rise prediction to be 'conservative' and hence no justification for including an 'allowance for uncertainty'.</p>	
			<p>RECOMMENDATION 2 If the WA government determines that all coastal repair and adaptation costs are to be borne by private landowners at Peppermint Grove Beach, the suggested levy should be paid at a reduced amount (about \$210 per year) over the 100 year life of the CHRMAP period.</p>	<p>Much of the concern displayed at the May 2 public meeting was based upon the draft CHRMAP's statement that residential landowners at Peppermint Grove Beach should or could pay an annual levy of \$1396 per property for each of the next 15 years in order to raise the funds needed for coastal remediation and adaptation works. It was explained at the meeting that the methodology which produced this statement was a requirement of the WA government which all local governments containing coastal land within their boundaries have been required to adopt and apply. The belief that existing landowners should be the sole funders of coastal remediation and other works on private land and should, over a 15 year period, pay for 100 years of such works lacks fairness. Future landowners purchasing properties at Peppermint Grove Beach at the end of the 15 year levy period will enjoy for free the benefits of those works. Nonresident beach and coastal zone users will also enjoy the free benefits courtesy of the levy paid by private landowners.</p>	

			<p>ON 3</p> <p>The Capel Shire Council should advise the state government that the state is ultimately responsible for the consequences of those planning decisions which allowed development of the coastal zone. Accordingly, the WA government should accept all financial responsibilities for coastal adaptation and related works. If however the Capel Shire Council determines that</p>	<p>5. As pointed out by an attendee at the May 2 meeting, there is a very strong argument in support of the WA government funding all coastal adaptation and related works on the grounds that all land use developments within the coastal zone have required the prior approval of the state government over many decades.</p> <p>Similarly, in more recent years, urban land development at Peppermint Grove Beach has been approved by the Shire of Capel via its various planning documents. On this basis, it can be persuasively argued that all Shire ratepayers have some responsibility to fund coastal adaptation and related works.</p>	
			<p>RECOMMENDATION 4</p> <p>Tables 5.7 and 5.8 should be amended to also show the IMPACT as well as the vulnerability of different land categories to erosion and</p>	<p>6. In his presentation to the May 2 meeting, the consultant Karl Ilich showed Tables 5.7 and 5.8 as contained in the Capel to Leschenault CHRMAP. Both tables show an EXTREME vulnerability rating as at 2020 from erosion and inundation for residential land. When questioned, Karl replied that only 1 or 2 properties were at risk as at 2020, whereas a large number of properties were at risk as at 2110.</p> <p>Both tables are misleading in that, by failing to take account of the number of properties at risk at different times over the study period, the tables take no account of the IMPACT from rising sea levels at the different time periods. By applying an EXTREME rating to residential land as at 2020, the implication is that large-scale adaptation and other works are required as a matter of EXTREME urgency. Clearly large-scale action is not required in the short term as so few residential properties are at risk.</p>	
			<p>RECOMMENDATION 5</p> <p>Section 6 RISK EVALUATION AND TREATMENT of the Capel to Leschenault CHRMAP should be reviewed by incorporating Reef Balls as a stand-alone treatment option so that their use can be properly judged on their technical and</p>	<p>7. Table 6.4 lists the possible risk treatment options as described in an unnamed WA Planning Commission report dated 2019. Table 6.5 then summarises a multi-criteria analysis of each option, showing which options deserve further investigation and, by implication, those that do not deserve further investigation.</p> <p>Table 6.4 describes Artificial Reefs thus: "Construction of a submerged artificial reef offshore, to dissipate wave energy impacting the shore by causing waves to break on their seaward side and reducing wave energy on the leeward side. Artificial reefs do not block waves and during storm events water depths over the reef may be sufficient to allow waves to pass over the reef without breaking, reducing their effectiveness in protecting the beach from erosion." However, a relatively new design of shoreline protection – Reef Balls – see https://www.reefball.org/ and https://www.eternalreefs.com/the-eternal-reefs-story/aboutreef-balls/ - have been shown to be among the cheapest hard structure to provide the benefits of an artificial reef while also enhancing shoreline protection and marine biodiversity. They have been successfully used in many parts of the world to effectively protect eroding shorelines, even under storm conditions.</p> <p>Stating that Artificial Reefs as a group do not deserve further investigation is unprofessional as the use of Reef balls is worthy of further assessment.</p>	

				<p>RECOMMENDATION 6 Sediment dynamics within the Busselton to Capel section of the Geographe Bay shoreline should be fully evaluated to determine if sediment availability assisted by storm winds and waves will mitigate some or all of the adverse erosional effects that are assumed will occur within the Capel to Leschenault CHRMAP area. Further. the geology of the coastal dunes at</p>	<p>Recent research by Dr Dennis Gee, a private geological consultant, has shown that there has been no changes in shoreline sand volumes within the Dunsborough to Wonnerup section of the City of Busselton's section of coastline. Instead, sand has been moved offshore and then inshore or moved west or east over time. Erosion and accretion have therefore been of local rather than regional impact over the 80 year time period of Dr Gee's study (based upon aerial photos taken during the second world war).</p> <p>Consideration of Geographe Bay's coastal geomorphology shows that Peppermint Grove Beach is the first section of coastline east of the hard shoreline of the Cape Naturaliste region where substantial sand dunes have formed. This could only have happened if sediment supply to this section of coast was significant, allowing the gradual northerly curvature of Geographe Bay and the resulting exposure of this section of coast to stronger winter storm winds to create substantial dunes. Thus, Peppermint Grove Beach's favourable location in the formation of tall sands dunes may provide protective benefits against future as sea levels rise.</p> <p>Further, at the May 2 meeting, Rex Barber stated that mineral exploration which he conducted in 1971 throughout the Capel Shire's coastal zone showed the extensive presence of limestone at or close to sea level. This zone of harder rock is likely to provide significant protection to the sandy shoreline and dunes at Peppermint Grove Beach and the area's geology therefore deserves detailed investigation.</p>	
C010					<p>Firstly, the public and ratepayer engagement on this matter has been appalling. First knowledge of this Plan was received by myself on 7 May 23 from an urgent community email. Having a closing date of 19 May is just unacceptable. In order to fully comprehend and assess the impact of this report and its implementation, 4 weeks is insufficient. Busselton have given their residents 4 months. The Shire has an innate responsibility to contact ALL ratepayers and residents to advise of the report and that there are significant implications to them both financially and physically. This has not been done to my knowledge and may be construed as a deliberate act to minimise scrutiny. I have just now become aware that a community meeting was held on 2 May. How were we, the ratepayers and residents, advised of this meeting?</p>	<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required including engagement with local stakeholders and community members, before implementation of adaptation options on the ground. Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines.</p>
					<p>Secondly, even considering imposing a financial impact of approx \$1,400 per year for 15 years on PGB residents/ratepayers is just unacceptable. Consequently, this proposal is vehemently opposed and re-consideration of the whole matter has to be done. Active engagement of all ratepayers must be completed and options presented that minimise the impact on a small group of ratepayers. This must be done with a meeting that gives notice to all residents and ratepayers of that meeting. This should be done by way of mail or email or both. It cannot be left to a random notice on a website or a community board.</p>	
C011				Same as C009	Same as C009. Bernie Masters is the original submission.	See Response for C009
C012				Same as C009	Same as C009	See Response for C009
C013					<p>I understand the CHRMAP's intent to provide a broad understanding of the hazards of inundation and erosion however in the absence of key data sets such as Geophysical or Geotechnical assessment the CHRMAP appears subjective and the assumptions used are not a panacea for sound decision making.</p> <p>The flaws of the CHRMAP are not just its obvious omissions (i.e. data sets & Geotech) but the inclusion of financial modelling based on incomplete data sets held within the report. The document clearly states the predictions "may differ in reality due to the lack of data" and yet this modelling has been used to provide indicative costings of a beneficiary pays model where residents will incur additional rate charges based on possible spurious claims of an incomplete report for activities which may or may not happen in 100 years' time! This understandably has created community angst and resistance and has focussed people's attention on their hip pocket rather than what actions are required to make the CHRMAP more accurate and have a degree of validity.</p>	<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required including engagement with local stakeholders and community members, before implementation of adaptation options on the ground.</p> <p>The methodology prescribed by SPP2.6 has been used to come up with a conservative allowance for coastal hazards so it can be used to identify vulnerable assets and plan for their adaptation. The method is not structured to come up with the best estimate of shoreline position at a given timeframe. The process is based upon the best available data and represents a conservative estimate which includes allowance for uncertainty. In order to refine coastal hazard allowances, the CHRMAP data collection and investigation recommendations (including geotechnical investigation) can be implemented. Other implementation actions are trigger based, which the coastal monitoring can assist with.</p> <p>Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines.</p>

					<p>The inclusion of this financial modelling appears to have detracted thought away from the omissions and what is required to strengthen the report. If the CHRMAP had been released without the financial modelling I am sure there would have been a very different reaction with focus laid upon what actions are required to provide better data to plan for the future rather than what you are going to have to pay in the short term.</p> <p>Whilst the Shire may have requested the inclusion of the financial modelling in the report to “prompt discussion” I would suggest this has backfired with noticeably clear opposition to the prospect of charges being borne by the residents. This is not surprising given WA & the community are experiencing a cost-of-living crisis with many people being on fixed incomes. The lack of foresight displayed by the Shire surrounding the timing and inclusion of the financial modelling or exploration of any intergenerational equity in the costs only seeks to reinforce the view of a Shire being out of touch with its residents.</p>	
					<p>A further flaw of the CHRMAP is also its claim of comprehensive community engagement during its development. Whilst a values survey has been conducted with 181 submissions received, the data does not enable a breakdown of who completed that survey or where the people who completed the survey resided. The 181 submissions were across all LGA's and not specific to Peppermint Grove Beach - hardly a representative sample. To state within the report that this consultation engenders “acceptance of its outcomes” is far from the truth</p> <p>With better data, the ability to plan and predict costs appropriately would be improved, as would the ability to seek and explore different State & Federal funding sources. Only then should a discussion with residents occur surrounding the possibility of funding shortfalls.</p> <p>As an aside it is interesting to note the managed retreat strategy is the preferred recommendation of the report and yet the State Government remains silent on how it proposes to fund such an option. Is the Shire of Capel working with WALGA to progress this issue? I also note the Busselton CHRMAP recommends a very different approach to that of Capel's. Surely there needs to be a holistic view of strategies to adopt across the wider Geographe Bay Area rather than current siloed thinking?</p> <p>In summary I do not believe the CHRMAP can be used as a key reference. I strongly oppose the CHRMAP in its current format.</p>	
C014					<p>I attended the community meeting at the PGBCCommunity Centre on May 2nd. I was previously ignorant of the information presented and attended with the view of listening to all the information and then making decisions. I would like to acknowledge that this is a conversation that needs to get started and appreciate that the WA state government and the Capel Shire are planning for climate change related environmental impacts.</p>	See Response for C009
					<p>RECOMMENDATION 1</p> <p>I do not believe that large-scale action is required in the short term as so few residential properties are at risk in the next 15 year period. So this recommendation that existing landowners should be the sole funders of coastal remediation and other works over a 15 year period is grossly unfair. If this scenario is adopted by council, a levy should be paid over 100 years.</p> <p>Future landowners purchasing properties at Peppermint Grove Beach at the end of the 15 year levy period will enjoy for free the benefits of those works. Visitors to the area will benefit from the price paid by the local residents.</p>	
					<p>RECOMMENDATION 2</p> <p>As pointed out by another attendee at the May 2 meeting, there is a very strong argument in support of the WA government funding all coastal adaptation and related works on the grounds that all land use developments within the coastal zone have required the prior approval of the state government over many decades. Similarly, in more recent years, urban land development at Peppermint Grove Beach has been approved by the Shire of Capel via its various planning documents. On this basis, it can be persuasively argued that all Shire ratepayers have some responsibility to fund coastal adaptation and related works.</p>	
					<p>RECOMMENDATION 3</p> <p>The Capel Shire Council should advise the state government that the state is ultimately responsible for the consequences of those planning decisions which allowed development of the coastal zone. Accordingly, the WA government should accept all financial responsibilities for coastal adaptation and related works. If however the Capel Shire Council determines that only locally-sourced funds should be used to fund coastal adaptation and related works, then those funds should be sourced from all shire ratepayers, not just those owning land at Peppermint Grove Beach.</p>	
					<p>RECOMMENDATION 4</p> <p>Tables 5.7 and 5.8 should be amended to also show the IMPACT as well as the vulnerability of different land categories to erosion and inundation.</p> <p>I do not like that a study into an Artificial Reef as a mitigation factor was discarded. Stating that Artificial Reefs as a group do not deserve further investigation is very narrow minded and this model should be further investigated.</p>	

					<p>RECOMMENDATION 6</p> <p>The modelling of coastal erosion effects used a logarithm that was based on 'generic data'</p> <p>Sediment dynamics within the Busselton to Capel section of the Geographe Bay shoreline should be fully evaluated to determine if sediment availability assisted by storm winds and waves will mitigate some or all of the adverse erosional effects that are assumed will occur within the Capel to Leschenault CHRMAP area.</p> <p>The geology of the coastal dunes at Peppermint Grove Beach should be assessed to determine the presence or absence of limestone and, where present, what protection this less erodible rock will provide.</p>	
C015					<p>I recently moved to Peppermint Grove Beach and only received email notifying of today's CHRMAP Peppermint Grove Beach meeting, and Capel Shires intentions, this week. I am currently overseas, as I am sure you are aware, a lot of Peppi residents do go away at this time of year. So why the short notice at a time when not all residents can attend, and yet this affects all residents/home owners?</p> <p>You are talking of implementing plans in 2035. So why should current rate payers be paying now for plans they are unlikely to receive any benefit from?</p>	<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required including engagement with local stakeholders and community members, before implementation of adaptation options on the ground.</p> <p>Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines.</p> <p>Other aspects of the submission are acknowledged and will be considered by Shire staff, but are outside the consultant's scope of work for this project.</p>
					<p>I also have concerns as a rate payer on other issues, which I mistakenly thought would currently be addressed by Capel Shire:</p> <ol style="list-style-type: none"> 1. Controlled burn offs in the Tuart Forest. 2. Any plans for a second access road to Peppermint Grove Beach, required in emergencies. <p>Please also consider current rate payers of Peppi do not have postal delivery service or public transport.</p>	
C016				<p>Council delay consideration of the CHRMAP report for at least 4 months</p> <p>Reasons being:</p> <p>Most residents at PGB are held to be absentee landlords who come to the beach for holidays and normally reside in other parts of WA. These people need to be made aware of the report and possible ramifications.</p> <p>There are also a considerable number of investment properties and the same issues apply to these owners.</p> <p>Many long term residents feel that their knowledge of the environmental impacts on the beach and surrounds over the past 60 years have not been considered in the report.</p> <p>Residents and landowners wish to understand why the Shire is now responsible for the coast of any mitigation works when it was the State Government who organised and paid for the original levees on the Capel River in the 1960's.</p> <p>We wish to request there will be no published materials which would negatively affect property values until the matter is resolved.</p> <p>Overall, the meeting participants questioned the legality of such a large levy over such a short period of time without voter input.</p>	<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required including engagement with local stakeholders and community members, before implementation of adaptation options on the ground.</p> <p>Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines.</p> <p>Other aspects of the submission are acknowledged and will be considered by Shire staff, but are outside the consultant's scope of work for this project.</p>	
C017					<p>While I agree a risk assessment regarding future Coastal Inundation is a necessary and valuable exercise I don't agree with the draft proposal findings and believe the Coastal Hazard Inundation draft report needs further scrutiny for MU1. I walk the beach daily and have done so for the past 19 years and there doesn't appear to be any visual evidence to support the extreme hazard rating. As an example I suggest an inspection of the steps leading to the beach from the dwelling at 1 McCourt Place. This dwelling appears to be well in excess of 20 years old and erected on a dune very close to the beach. A visual observation of the steps and the dune indicate no evidence of Coastal Inundation over that time. The final report assembled by the current and projected data needs to be beyond a question of doubt as it may have the potential to affect current and future housing insurance premiums and almost certainly the future property values.</p>	<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required before implementation of adaptation options on the ground.</p> <p>We note that there have been some concerns on the methodology, the hazard maps and what it means for the Capel community in terms of implementation, which is understandable. This is the reason why public consultation is a key component of any CHRMAP project, so that issues can be identified and hopefully by working together, sustainable solutions can be planned.</p> <p>The methodology prescribed by SPP2.6 has been used to come up with a conservative allowance for coastal hazards so it can be used to identify vulnerable assets and plan for their adaptation. The method is not structured to come up with the best estimate of shoreline position at a given timeframe. The process is based upon the best available data and represents a conservative estimate which includes allowance for uncertainty, using sea level rise values and allowances for erosion prescribed by the Department of Transport. In order to refine coastal hazard allowances, the CHRMAP data collection and investigation recommendations can be implemented. Other implementation actions are trigger based, which the coastal monitoring can assist with.</p> <p>In summary the CHRMAP has been completed using best, currently available information. The purpose of the project is to conservatively identify an allowance for coastal hazards and allow identification of vulnerable assets, in order to inform future planning and risk management.</p> <p>A 2021 report by the Insurance Council of Australia (https://insurancecouncil.com.au/resource/actions-of-the-sea-vulnerability-study/) notes:</p> <p>"It is not standard practice for insurers to offer cover for Actions of the Sea globally. There is currently a lack of data and knowledge to understand the risks, and until there is a better understanding of these risks, insurers will be unable to adequately assess, quantify and consider underwriting. Even then, there is no guarantee that insurers would be able to provide products to cover Actions of the Sea. We recognise that Actions of the Sea present broader community issues, and that there is considerable uncertainty about the best way to address these risks. Many communities are at risk now, as a significant amount of property and assets have been built in exposed areas around Australia's coast."</p>

C018				<p>We the undersigned, do respectfully request that the Council: Understands that the PGB community rejects the Shire's CHRMAP due to the proposed mitigation strategies, the impact on PGB amenity and property values and the fact that this community alone is required to pay the levy to mitigate erosion hazards. The CHRMAP has serious financial implications for our residents and we petition to further consultation with shire staff and Councilors prior to the advertised cut off date of May 19, 2023</p>	<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required including engagement with local stakeholders and community members, before implementation of adaptation options on the ground.</p> <p>Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines.</p>
C019				<p>We are property owners and part-time residents in Peppermint Grove Beach but were unable to attend the public meetings held on 18 April and 2 May. We offer this submission as part of solicited public comments on the Draft CHRMAP released by the Shire of Capel at the end of March 2023. Upon reading the Draft CHRMAP we offer the following comments.</p>	<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required including engagement with local stakeholders and community members, before implementation of adaptation options on the ground.</p> <p>The methodology prescribed by SPP2.6 has been used to come up with a conservative allowance for coastal hazards so it can be used to identify vulnerable assets and plan for their adaptation. The method is not structured to come up with the best estimate of shoreline position at a given timeframe. The process is based upon the best available data and represents a conservative estimate which includes allowance for uncertainty, using sea level rise values and allowances for erosion prescribed by the Department of Transport. In order to refine coastal hazard allowances, the CHRMAP data collection and investigation recommendations can be implemented. Other implementation actions are trigger based, which the coastal monitoring can assist with.</p> <p>Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines.</p> <p>Technical review has been undertaken by the project Steering Group throughout the project by experts in the relevant scientific and engineering disciplines.</p>
				<p>1. The partnership which has initiated this preliminary study should be commended on their collective action and foresight in exploring measures that can be taken within the next few decades to mitigate the risk of coastal erosion along the Bunbury-Geographe coast area due to rising sea levels that have been linked to climate change. It is clear that planning and strategies need to be put in place to mitigate the risks associated with coastal erosion due to rising sea levels and actions of the sea because of climate change, and that such mitigation strategies are likely to be needed for many parts of the WA and Australian coastline, including those that are the subject of the Draft CHRMAP. Indeed, a simple Google search turned up quite a few CHRMAP draft plans for other Australian locations, including some in WA, but also some for locations in the eastern states. This points to the fact that coastal erosion and risks to property and land adjacent to coastal areas is a matter of concern for the whole population of Australia, including everyone in WA. It is not the exclusive concern of property owners or shires where there is coastline or coastal areas that might be affected. Taking measures to address the causes and effects of climate change is a collective, community responsibility. Taking action to mitigate the risks to the WA coastline due to climate change-driven rising sea levels is similar to measures taken by the state and shires to prevent environmental and property destruction from bushfires: it is a collective responsibility. This is recognised by the Emergency Services Levy issued by the state annually to fund, among other services, emergency fire services that respond to, and try to prevent, bushfires. Not all residents benefit directly from those services but we all chip in to pay for them.</p>	
				<p>2. It is therefore our strong view that Peppermint Grove Beach property owners, and owners of coastal properties in other potentially affected locations, should similarly not be burdened with a levy simply based on their property's location to pay for future coastal erosion and inundation risks where they may not even be the beneficiaries. This is based on a flawed "user pays" principle, since property owners who live there are not the sole "users" of these coastal areas. The "user pays" principle, where—to quote the Draft CHRMAP report—"the beneficiaries of adaptation Options should pay for them" is not currently applied to owners whose properties may suffer in the near or distant future other effects of climate change, like flooding due to cyclones and bushfires. Why should property owners in coastal areas be treated differently? This is obviously very unfair. Peppermint Grove Beach is used by many other residents of the Shire of Capel and visitors to the region. If a levy is to occur to help pay for adaptations at Peppermint Grove Beach, the cost of the levy should be borne by all Shire rate-payers, as well as the WA Government, not just those with properties that may in future be affected by rising sea levels, coastal erosion or inundation. The state and Shire approved development of coastal areas around the coastline of WA, including very recent developments in Peppermint Grove Beach, and this has occurred in other regions that may be vulnerable to destructive natural events. We have a collective duty to plan for and mitigate such risks where we can. Singling out only certain property owners among the Shire's rate-payers for a greater share of the financial burden is unacceptable.</p>	

				3. Having read the CHRMAP and digested it to the best of our ability, and comparing it to other CHRMAPs for other Australian locations that are available online, we wish to raise concern about a matter that another resident has noted, namely that the data predicting the rise in sea levels used for this study are old and may not be up to date or reliable. Since the prediction about how much the sea will rise and at what rate is fundamental to the findings of this report, as well as its recommendations about adaptation strategies to undertake, it seems very important that those recommendations are relying on the best and most recent body scientific knowledge available, not research that may be out of date.	
				4. Moreover, we note that some other CHRMAPs freely available to read online have been peer-reviewed by an expert external to the organisation that has produced the report. This does not appear to be the case with the present CHRMAP for the Peron Naturaliste Partnership, City of Bunbury, and Shires of Capel, Dardanup and Harvey. Peer-review is a bedrock principle of good science and, if this has not occurred, it is our view that the present Draft CHRMAP should undergo external peer-review by experts qualified in the relevant scientific disciplines prior to accepting its recommendations in order to give Shire residents and rate-payers full confidence that its findings and their implications are reliable, and that there is no conflict of interest for the company commissioned to produce the report.	
C020				As a long-term rate payer of 50 years at Peppermint Grove Beach, I object to the proposal that may incur a levy of \$1396.00 per year, or any form of Levy, for events that are predicted to take place in 27 years, and then 97 years from this point in time. Raising the levy banks are a P.W.D responsibility as it was constructed by them, or the office of rivers and water ways, or the state Government equivalent, not the Capel shire or rate payers. On the concern expressed in the report about Peppermint beach road leading into the community, this road has flooded twice in the past and several verbal requests were made to have it elevated. The during more recent times, the same request was made as a cost saving exercise while the new bridge was being installed, and a detour was in place while that work was undertaken. Now what was an easy fix has turned in a need for a Levy?	Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required including engagement with local stakeholders and community members, before implementation of adaptation options on the ground. Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines.
C021				If a few long term residents had not alerted the community, to the fact that Capel Shire was preparing to impose an extra \$1,396 on Peppermint Grove Beach residents only for a period of 15 years! And that this session was to be held at the Peppermint Grove Beach Community Centre 5-7pm Tuesday evening, very few people would have attended. Because of local networking the hall was full of worried residents. No formal notification of this very important session was sent to the rate payers. This is particularly important as there is a large component of holiday homes in this area. They are also rate payers, they knew nothing of this session. No consultation at all. No minutes of the session presented on 2nd May have been sent out, I was led to understand they would be circulated, by email I left my email address on the attendance sheet. Why should we be penalised? Everyone in some way is contributing to climate change, why are we being singled out? This is the responsibility of State Government not Local Government!	Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required including engagement with local stakeholders and community members, before implementation of adaptation options on the ground. Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines. Notes from the meeting at Peppermint Grove Beach on 2/5/2023 have been included as an Appendix to the Capel CHRMAP document.
C022	p. 13/2.4			The CHRMAP reports that the shire does not have a history of reported erosion, and desktop reviews indicate coastal flooding has been an infrequent hazard. The report then infers that nonetheless inundation risk remains high. It would appear financially reckless to determine any set levy based structure based on the above comments.	Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required including engagement with local stakeholders and community members, before implementation of adaptation options on the ground. Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines. A 2021 report by the Insurance Council of Australia (https://insurancecouncil.com.au/resource/actions-of-the-sea-vulnerability-study/) notes: "It is not standard practice for insurers to offer cover for Actions of the Sea globally. There is currently a lack of data and knowledge to understand the risks, and until there is a better understanding of these risks, insurers will be unable to adequately assess, quantify and consider underwriting. Even then, there is no guarantee that insurers would be able to provide products to cover Actions of the Sea. We recognise that Actions of the Sea present broader community issues, and that there is considerable uncertainty about the best way to address these risks. Many communities are at risk now, as a significant amount of property and assets have been built in exposed areas around Australia's coast."
	p.19/3			The report indicates "Results derived from this study should not be over-interpreted at a micro-scale due to the assumptions applied and the limitations in model resolution" It would appear financially reckless and unjust to determine levy fees based on the above comments.	
	Table 6.5/6.4			Adding notification to our titles, with the above uncertainty of the modeling will unfairly impact our property investments. Title notification would then have Insurance implications, whether the modeling is correct or not.	

p.49/7.2.3.1			Any levy collection should be evenly apportioned.	With the large amounts of low lying agricultural / rural lands in the area, some with exclusive access to beach fronts, the annual funds to be collected (\$52 p/y) appear grossly under weighted as compared to what you propose for residents (\$1396 p/y). As per planning rules and shire approvals, our homes have been built as required (elevation, set backs etc), and possibly not be the first impacted should modeling be correct.	
p. 60/8.3.2			Any levy collection should be based over a 100 year period to lessen burden.	While the plan proposes a rate that can be applied to beneficiaries within a 100 year hazard zone and the amount raised should fund the estimated 100 year cost, this cost unfairly targets residents within the first 15 years without spreading the load for future residents within the study period.	
p. 62/8.3.7			Levy collection should be fairly distributed across all users, not only residents.	8.3.7 P62 While the report promotes “Beneficiary Pays” and the proponents have been happy to assign a cost to residents, there has been no attempt to quote a cost to accommodation providers or the paid parking options mentioned. Visitors to the area greatly outnumber local residents yet we will bear the brunt of the proposed fees. - Capel residents enjoy the amenity of Peppermint Grove Beach but are not expected to assist in mitigation costs. - Commercial accommodation providers will be charged a lesser yearly charge but proportioned over visitor numbers this would appear insignificant on a per capita basis.	
Table 8.3/8.7.1				Catchment drainage and river levee management should be a state bourne cost spread across the wider community. It is unjust to expect a local community to fund these remedial works. The Gascoyne levee banks were funded under the State Governments Royalties for Regions plan, not the local ratepayers. In the short term the erosion recommendations focus on foreshore reserves and coastal amenities which are not only for our benefit but a community wide asset, just as it was probably funded when initially established.	
				CHRMAP maps and modeling While the partnership, state government and local government have readily disclaimed any responsibility for accuracy of the modeling and mapping, there appears to be a strong impetus to suggest rate levies for this community. Surely, as a community we should expect value for money based on good remedial actions. The above disclaimers would imply more research and consulting is required and likely with our rate levies. With the statewide nature of the issues the State Government should be expected to step up to the task and manage as a whole, and not have numerous local government agencies all attempting to manage the situation. We built to the planning rules presented at the time and may now be penalised for it. It would appear that any consideration of levies is premature and currently based on questionable assumptions. As the potential levy concept was a pilot / test basis we feel that even mentioning this in any report has lacked consideration for local residents and has unfairly impacted us as compared to other jurisdictions, has jeopardised our property investments and added undue concern for our futures. Any consideration of a levy should include it being evenly distributed over all users, over the entire 100 year period, and not a short term 15 year penalty for the current local residents. Coastal planning is dictated by State Government planning and as such should accept the financial cost of any remediation. Home buyers made their purchase decisions in good faith thinking coastal planning approvals had been adequately researched and based on good science, and not be revised at a later cost to us. The Gascoyne River levee works are an example of sharing the cost burden, with funding made available from the State Governments “Royalties for Regions”. We are a region as well.	
C023				I wish to submit my concern that the CHRMAP for our region was given the scope to include a Pilot Study resulting in a dollar value of \$1396 per year for 15 years being levied at residents of Peppermint Grove Beach. I request that:	See Response for C009
				The Shire of Capel should request that the state government review the 0.9 metre sea level rise prediction and, in the absence of evidence gained over the last 14 years, the government should assess whether the predicted sea level rise around the coast of south west Australia should be set at 0.38 metres.	
				The Capel Shire Council should advise the WA state government that the state is ultimately responsible for the management of climate risks. Accordingly, the WA government should accept all financial responsibilities for coastal adaptation and related works.	
				To fund Coastal Hazard Management state-wide, I propose an annual levy on all WA ratepayers similar to the ESL (Emergency Services Levy	
				The Capel to Leschenault CHRMAP should be reviewed by incorporating Reef Balls as a stand-alone treatment option to reduce coastal erosion, so that their use can be properly judged on their technical and financial merits.	
				Sediment dynamics within the Busselton to Capel section of the Geographe Bay shoreline should be fully evaluated to determine if sediment availability assisted by storm winds and waves will mitigate some or all of the adverse erosional effects that are assumed will occur within the Capel to Leschenault CHRMAP area, and that the geology of the coastal dunes at Peppermint Grove Beach should be assessed to determine the presence or absence of limestone and, where present, what protection this less erodible rock will provide.	

					If in future the Capel Shire Council determines that only locally-sourced funds should be used to fund coastal adaptation and related works, then those funds should be sourced from all shire ratepayers, not just those owning land at Peppermint Grove Beach.	
					<p>Australia, but globally, and that this may occur in many forms, as stated in reports such as this by the WA Govt, https://www.wa.gov.au/system/files/2022-1/Western_Australian_Climate_Projections_Summary.pdf</p> <p>"Summary of climate trends</p> <p>Western Australia's climate will continue to change over the coming decades.</p> <p>By 2050, the following changes are projected:</p> <p>Western Australia is already experiencing the impacts of climate change</p> <ul style="list-style-type: none"> • Western Australia has warmed by about 1.3 °C since 1910. • Since 1900, rainfall has increased over most of Western Australia, apart from the far west and south-west where it has declined. <p>The decline in south-west Western Australia has been larger than anywhere else in Australia and is highly attributable to human influence.</p> <ul style="list-style-type: none"> • The number of days with dangerous weather conditions for bushfires has increased in nearly all locations. • Under a high emissions scenario (RCP8.5), Western Australia's temperature is expected to increase by about 2°C (range of 1.5 to 2.4 °C). • Large and sustained reductions in global greenhouse gas emissions (RCP2.6) reduces this projected warming to about 1.2 °C (range of 0.8 to 1.6 °C). • Extreme temperatures in all regions are very likely to increase into the future. The number of very hot days (>40 °C) is projected to increase from about 1.5 to five days per year in Perth, and from six to 16 days in Broome. • By mid-century under a high emissions scenario 2: <ul style="list-style-type: none"> • the climate of Perth is projected to be more like the current climate of Jurien • the climate of Albany is projected to be more like the current climate of Busselton • the climate of Broome is projected to be more like the current climate of Derby. • Western Australia can expect longer fire seasons, with about 40 per cent increase in very high fire danger days. <p>2021 2050</p> <ul style="list-style-type: none"> • Sea levels are projected to rise by about 24 cm along the West Australian coast. • Mean rainfall is projected to continue to decrease in south-western Australia, while changes over northern Australia remain uncertain. 	
					I reiterate that to fund Coastal Hazard Management state-wide, I propose an annual levy on all WA ratepayers similar to the ESL (Emergency Services Levy).	
C024					<p>I have been a Capel ratepayer at PGB for 42 years and although I have not seen any change in beach erosion or sea levels in this period I know that the report will be accepted on scientific grounds by the Capel Shire.</p> <p>At this meeting the Shire CEO stated that the council will approve this PNP report.</p> <p>Therefore I must state emphatically that if any increase in rates or levies is enforced then this must be shared by all ratepayers in the shire of Capel.</p> <p>I believe this spreading of the cost is fair considering the wide variation of expenditure throughout the shire. eg expenditure in Boyanup, Elgin Dalzellup and the town itself.</p>	<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required including engagement with local stakeholders and community members, before implementation of adaptation options on the ground.</p> <p>Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines.</p>
					Secondly the cost of remedial work which will be a waste of money anyway, should be spread over 100 years, not 15 years.	
					Thirdly we ratepayers built our homes to regulations specified and approved by the Planning commission and the shire of Capel, and to charge levies retrospectively is unjust.	

C025			<p>Recommendation 1 Engage in Public Consultation appropriately. Speak to people in plain English not via a document that clearly states throughout that, 'No responsibility will be accepted by the Peron Naturaliste Partnership and it's member Local and State Govt Authorities and agencies for the ACCURACY of the information provided.'</p>	<p>I feel that your Public Engagement process has been lacking. I realise the CEO does not have an easy task in addressing this topic, with no actual facts to back up any sort of strategy. Perhaps instead of leaving a document for people to find on social media, consider a letter drop to your residents. This could have been achieved via their addresses on the rate payer notices. Far more direct and appropriate. You have missed many landowners from out of town. It is remiss to not include their opinions. It was discussed at a meeting last Wednesday night at the community centre that we would appreciate MORE TIME and DISCUSSION.</p>	<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required including engagement with local stakeholders and community members, before implementation of adaptation options on the ground.</p> <p>The original 8 week comment period was extended to 12 weeks following requests from community members.</p>
			<p>Recommendation 2 Consider looking further afield for your opinions. We know this is a worldwide issue. One contractor who applied a computer algorithm is insufficient. You have intelligent people in your own community, and we live in an interconnected world. You cannot make the community liable financially to correct a worldwide problem. Do our landowners profit from this area? (Some do,</p>	<p>Evidence-based practice requires that we ask questions, acquire evidence, critically appraise the evidence to assess validity and then apply the evidence, audit and evaluate. I have not seen any evidence that anyone is willing to take accountability for? Are you really willing to stand by labelling an area that has been labelled Extreme Risk that your department previously zoned as residential?</p>	

			<p>n 3 To gain more cooperation and address your duty of care you need to include ALL of your Stakeholders. Make your process more respectful and transparent. Clearly state who endorses any implementation and who they report to. State clearly who is accountable to measure the strategies' benefits and review the outcomes. Have a multidisciplinary team of</p>		
				<p>2 weeks for community to comment is a flippant attitude to what many people have considered bad news. There are people worried enough to sell their properties based on this document. Please address the ACTUAL RISK openly with people and give the community far more input and time.</p>	
			<p>n 4 In cooperation with Federal and State funding, approach your community more appropriately to achieve engagement and cooperation in projects of risk mitigation. Instead of creating fear and division by avoiding communication, have the hard conversations and be willing to listen to EVERYONE. I see multi-tiered possibilities and benefits to a more inclusive approach. More</p>	<p>In my eyes this moment presents the Shire and Councillors with an opportunity to join with community to address a worldwide problem. There are many educated, informed, intelligent and capable residents who would love to leave a legacy of a strong intact environment.</p>	

C026					<p>As a resident and ratepayer of Peppermint Grove Beach in the Capel Shire, firstly we must comment on the lack of engagement by the shire to inform the community of this proposal. The only reason we were made aware of this plan, was by seeing a comment on the local community noticeboard about a proposed levy and then ourselves doing the research to find out what it was about. As outlined in the CHRMAP report "Community and stakeholder involvement is a critical component" to the process. I am sure if more ratepayers of Peppermint Grove Beach were informed of this strategy then you would have received many more submissions, so hopefully the shire will take the time to have very open and transparent communications with those involved from now on.</p>	<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required including engagement with local stakeholders and community members, before implementation of adaptation options on the ground.</p> <p>Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines.</p>
					<p>The CHRMAP report identifies its interpretation of coastal hazard risks and recommendations for management of those risks. It is focussed on preserving assets and values for public benefit but does incorporate private assets as well, but then goes on to point out that "no law requires public authorities to protect private property from natural hazards nor compensation when land is lost due to coastal hazards"</p> <p>It also recommends a lot more studies be undertaken on site specific areas.</p>	
					<p>We would take this time to object to any levy being placed on the Peppermint Grove Beach owners rates for the next 15 years as a strategy to fund projects as outlined in Section 7 Risk Treatment Analysis, the same projects that have not been costed as it is dependent on potential threat in the future.</p> <p>To have a select few nominated to pay extra levy for a global crisis that is happening around the world seems unjust. We as ratepayers see our dollars paid annually, shared across a variety of expenditures within the shire, to facilitate many projects which we may never be involved in or use. Also being asked to pay extra dollars to fund a strategy and have no claim or compensation of our residence if that strategy is to fail, also is unjust.</p>	
					<p>It is our belief that if the Capel Shire should create a mitigation fund, that it be funded by all across the Shire towards this plan. The entire coastline is for the whole community to use along with thousands of tourists each year in the caravan park and rentals within the area. This brings valuable dollars into our community as well. If such a mitigation fund is to be created, it is only reasonable to expect all to contribute towards a plan, not just the people who own land here at Peppermint Grove Beach, and at this time when everyone is having financial struggles it needs to be a reasonable contribution. There are also options as outlined in the report of both state and federal grants and funds, to raise dollars towards a management fund.</p>	
C027					<p>I became aware of this release of the plan essentially by word of mouth within our community. I was aware that this document was in preparation as I had attended a meeting some two years ago but many residents of our Shire were not aware that this was coming. There does not seem to have been any real attempt by the Shire to formally notify residents/ratepayers of the existence of the CHRMAP. This document, if approved, has the potential to affect people's lifestyles, property values, financial situation and general peace of mind.</p>	<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required including engagement with local stakeholders and community members, before implementation of adaptation options on the ground.</p> <p>Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines.</p> <p>The original 8 week comment period was extended to 12 weeks following requests from community members.</p>
					<p>The document seems to have become available on the Capel Shire Website sometime around the first week in April. The Shire is accepting public submissions until 19 May.2023 This has given us 6 weeks to digest the content, check the validity and review the potential impacts. I would argue that this is not an adequate amount of time at all. I also note that the overriding document , of which the Cape CHRMAP is a subset, gives a closing date for public comment as 16 June 2023.</p>	
					<p>Capel Shire website suggests that this document is a Draft but the word Final is clearly written at the bottom of every page.</p>	
					<p>The validity of the data and predictions presented in this Plan are beyond my expertise and experience to completely evaluate. Luckily as is the case in many West Australian communities, Peppy Beach has residents/ratepayers who have qualification and experience in relevant disciplines. Some of these people are suggesting that data, data sourcesd predictions used are to be questioned. .Obviously there has not been time for independent verification to happen.</p>	
					<p>The concept of subjecting the Ratepayers of Peppy Beach to a hefty annual levy to cover the cost of mitigation of the effects of climate change is abhorrent. Differential rates are divisive. All of the coast of Australia is to be enjoyed and protected by all of us. Any extra contribution required from our Shire should be shared by us all. The Capel Shire was actively involved in the planning and implementation of our village. They have taken fees and approved building applications for every dwelling. They have taken rates from every property for many years.</p>	
					<p>It is accepted that the time for action on reduction of the impacts of climate change is yesterday but this CHRMAP needs work. The large attendance at your information session and our Community meeting well indicate that the residents of Peppy Beach are not at all comfortable with this. At the very least we need more time to research and consider this Plan.</p>	

C028				<p>After reading the Draft CHRMAP it is evident that some action on erosion and inundation will be required within 10-15 years and that using the CHRMAP as a working document, Local Government in effected areas will consider a levy on rates.</p> <p>As the report is only an estimate of the possible worst case scenario and while there is no doubt a threat, it is not exactly clear what actions will be required in the future. (The report for instance does not take into account future technology which may provide management alternatives that are not available today).</p> <p>Is it feasible to determine in 2023 how much money will be needed in the future and who will be required to be levied or not?</p> <p>For these reasons, I don't agree that imposing a coastal protection levy on certain rate payers is appropriate at all. It is unconscionable to burden struggling families with extra costs at this point in time when the cost of living is so high. The fair and equitable solution is that the WA Government pay for the actions/preventions detailed in the CHRMAP rather than Local Government. The arguments for this are:</p> <ul style="list-style-type: none"> • The WA Govt has huge revenue ready for allocation for expenditure. WA budgets could in the future include expenditure for actions/preventions detailed in the CHRMAP. • Extra costs imposed on private land owners will further increase the cost of living and may also increase the likelihood that property investors will exit which will further contribute to the housing crisis in WA. 	<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required including engagement with local stakeholders and community members, before implementation of adaptation options on the ground.</p> <p>Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines.</p>
C029				<ul style="list-style-type: none"> •As a rate payer, we will be refusing to pay this penalty. Any overdue money can be taken from my estate. •I fail to understand how a worldwide event can be filtered down to a minority of homeowners, unlucky enough to be on the end of this event, to cover the costs for fixes. •The people living in Peppermint Grove Beach are being blamed or fined for the consequences of rising ocean levels and climate change. Seems a little unfair. •The responsibility of approving monitoring and actions to repair has been placed in the hands of the shire officers and shire councillors to endorse. These people do not have sufficient knowledge to understand what needs to be done. No guarantee can be given the report writer/investigators recommendations are correct. •Multiple shires will be acting on fixes along our coastlines. What guarantees are being given to confirm actions on one section of coastline will not cause failure on alternative sections. •There does not appear to any consideration given to alternative studies involving sea currents, fisheries, sea grasses, impacts of constructing groins etc. Will this be done. •The state government has promoted their ownership of climate change and state infrastructure. Surely the states coastline falls into these categories. •No information has been given to confirm what the shire assets will be over the next 100 years. The shire advises of project requirement based on a road and toilet block constructed many years ago. Depreciation of these assets has not been considered, lifetime expectancy and construction type or standard in many years to come was not considered. •The consultation process provided was very poor. <ul style="list-style-type: none"> oResidents found out of the meeting via word of mouth, the shire provided limited contact to notify residents of the meeting. oThe shire CEO swept over nearly all resident attempts to speak and only allowed hand picked questions to be responded on oInformation cannot be found easily via the shire website directing residents to the project. oWhen information ids found, it is not written in simple English or summarised for normal people to understand. oThe Community meeting started at 5PM. Workers and parents were given limited option to particiapte 	<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required including engagement with local stakeholders and community members, before implementation of adaptation options on the ground.</p> <p>Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines.</p>

C030				<p>the recommendations and review period.</p> <p>2. Climate change is accepted as a scientific fact by the majority of the population.</p> <p>3. My understanding of the report is that it is a scientific report which provides recommendations based on some historical findings as well as future probabilities.</p> <p>4. Some of the future probable outcomes stretch to over 100 years. The report is fundamentally a risk assessment of options that may occur. However, the report only suggests one of the options available.</p> <p>5. Some of the foundation assumptions of the report may well already be out of date.</p> <p>6. Historical geographical events at Peppermint Grove Beach do not necessarily support the propositions provided in the report.</p> <p>7. A financial decision appears to have already been made to levy current property owners over a 13-15 year period. This is to cover possible events for the short term, and the long term. This is by no means a “user pay” type model. Whether the Shire agrees with a “user pay” type model is unclear, and the Shire may not indeed agree with the model. As the report discusses events over the coming 100 years perhaps thought should be given to the designated levy being collected over that period of time.</p> <p>8. I understand we, as property owners at Peppermint Grove Beach, have been given approximately six weeks to review the report and provide commentary. Such a process would at least involve:</p> <ul style="list-style-type: none"> - time for genuine information giving and receiving opportunities – providing one or two not well publicized meetings is not necessarily appropriate or worthwhile. - local debate for the residents • considerable time for the formation of individual and/or group responses • Opportunities to more rigorously review and better understand the scientific method, results and recommendations, including associated probabilities. <p>As, I understand it is with other surrounding Shires, perhaps a prolonged period of review (three – four months) would be appropriate.</p> <p>I would respectively suggest Capel Shire at least:</p> <ol style="list-style-type: none"> a. Review the amount and the collection regime of any levy. b. Extend the review period for at least another two months. 	<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required including engagement with local stakeholders and community members, before implementation of adaptation options on the ground.</p> <p>Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines.</p> <p>The original 8 week comment period was extended to 12 weeks following requests from community members.</p>
C031				<p>While the Shire of Capel website identifies the document as a “Draft”, the document identifies itself as “Final” in its title. If it is in fact a final version, it contains material deficiencies that should be corrected and built upon before any concrete action is taken based upon the content of the plan.</p>	<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required including engagement with local stakeholders and community members, before implementation of adaptation options on the ground.</p> <p>The methodology prescribed by SPP2.6 has been used to come up with a conservative allowance for coastal hazards so it can be used to identify vulnerable assets and plan for their adaptation. The method is not structured to come up with the best estimate of shoreline position at a given timeframe. The process is based upon the best available data and represents a conservative estimate that includes allowance for uncertainty, using sea level rise values and allowances for erosion prescribed by the Department of Transport. In order to refine coastal hazard allowances, the CHRMAP data collection and investigation recommendations can be implemented. Other implementation actions are trigger based, which the coastal monitoring can assist with.</p> <p>Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines.</p>

p. 19/3 STAGE B - COASTAL HAZARD ASSESSMENT		Clearly the CHRMAP is a preliminary document only, for the purposes of providing support for initial planning ONLY, with its predictions of erosion rendered unreliable due to the lack of data, and requiring detailed risk assessments for the development of solutions. It should not form the basis for the Shire of Capel to propose any specific measures to combat erosion,	On page 19, the document says: “...the hazard identification component of the present study was undertaken to provide a broad understanding of exposure that can support government planning...” and “...will be superseded once site-specific studies become available...”. Further, it states that “Results should not be over-interpreted at a micro-scale due to the assumptions applied and the limitations in (the) model...” and “More detailed risk assessments and analysis may be required for the development of detailed engineering measures...” .And “Erosion response across the study area may differ in reality to the predictions of this study due to the lack of data.”	
3.3 Erosion Hazard Results		To suggest that erosion from the 100 year storm will be 14 metres further inland than the vegetation line appears to be complete fiction, based on a model that has a lack of data and has been theoretically applied. Further and detailed investigation is required before any material steps (either physical or monetary) are taken to address an erosion problem that may not eventuate.	The 4th line of “Table 3.2 Erosion Hazard Allowance Summary” deals with MU1, which applies to Peppermint Grove Beach. S1 & S2 This table simulates storm erosion for the 100 Year recurrence interval storm and records it as 14 metres from the “horizontal shoreline datum” (HSD) – but in doing so appears to base this on “vegetation lines” only (since it records S2, “historic movement... .. based on... .. vegetation lines” (page 19) as zero, i.e. S1=S2). Further the HSD, from which it is measured, appears to be determined from “Present date vegetation lines which often characterise the upper limit of seasonal storm impacts” and/or 2m AHD (page 20). So, the CHRMAP appears to suggest that the erosion line from a 100 year storm is 14 metres further inland than the current vegetation lines at Peppermint Grove Beach, or the 2m AHD. Now, we have been property owners in Peppermint Grove Beach for more than 25 years and have not in that time seen erosion approach the vegetation lines on the beachfront. In fact, almost invariably, winter sees vast amounts of seaweed deposited on the beach, pretty much eliminating erosion of any kind.	

			<p>So – the CHRMAP estimates the advance of Erosion Hazard Lines at 1 metre per year ($\pm 20\%$) by applying a model that is internationally considered as essentially unusable in open-ocean coastal environments, based upon unstated assumptions on sea level rises (but which are in any case considered to be considerably uncertain by both the UN and IPCC) - and then extended the</p>	<p>S3 and Uncertainty</p> <p>The S3 column in Table 3 purports to “Evaluate sea level rise impacts (on coastal erosion) for present day, 2035, 2050 and 2120” (page 19). This calculation purports to apply the Bruun Rule to assess this erosion. The Bruun Rule uses the following variables to calculate the shoreline recession:</p> <ul style="list-style-type: none"> - sea level rise (m); - the horizontal length of the bottom affected by the sea level rise (m); - the water depth beyond which significant sediment transport does not occur (m); - the dune height above sea level (m); and - the average slope of the active profile. <p>Internationally, the Bruun Rule, which was first published in 1962, has been widely criticised. Some of the rule's most criticised assumptions include the nonexistence of gradients in longshore sediment transport, the existence of a depth of closure, a closed sediment budget, and the availability of sufficient sand sources. In 2015, Andersen et al. labelled the Bruun Rule as "...on its own...virtually unusable in open-ocean coastal environments..."</p> <p>The results of this calculation estimate the advance of the Erosion Hazard Lines as 1 metre per year (± 0.2 m/yr) for each year of the period from 2020 to 2035, with minor variations to 1 m/yr for the periods to 2050 and 2120. It reaches this result for the whole of MU1 to MU7 (the ocean coast from Peppermint Grove Beach to Bunbury). With respect to the rise in sea levels, according to the United Nations and the Intergovernmental Panel on Climate Change (IPCC):</p> <ul style="list-style-type: none"> - levels are currently rising an average of 4.5 mm per year (i.e. 1 metre over 220 years); - the rate of rise will accelerate between now and 2050 in response to already occurring warming; - if global warming is limited to 1.5 C then sea level rise will not accelerate further, but would still amount to 2–3 m over the next 2000 years. <p>The CHRMAP does not appear to state its assumptions on rising sea levels, but there is no doubt that there is considerable uncertainty about maximum levels and their timing.</p>	
			<p>Clearly the CHRMAP is a preliminary document only, for the purposes of providing support for initial planning ONLY, with its predictions of erosion rendered unreliable due to the lack of data and a flawed model, and requiring detailed risk assessments for the development of solutions. It should not form the basis for the Shire of Capel to propose any specific measures to combat erosion,</p>	<p>SUMMARY</p> <p>It appears that the CHRMAP is fundamentally deficient. It admits itself that:</p> <ul style="list-style-type: none"> - it is only intended to provide a broad understanding of exposure; - it should not be over-interpreted due to the assumptions applied and the limitations in the model used; and - erosion in reality may differ from the predictions of this study due to the lack of data. <p>It uses flawed assessments of the starting point for erosion (the HSD), suggests that erosion from the 100 year storm will be 14 metres further inland than the vegetation line (unbelievable), uses a flawed model considered unusable in open-ocean environments to assess erosion, and doesn't state its assumptions on sea level rises (for which there is considerable uncertainty according to the best global authorities on the subject).</p>	
				<p>SHIRE OF CAPEL ACTION</p> <p>We have heard that the Shire of Capel is considering imposing a levy on Peppermint Grove Beach ratepayers to cover the cost of mitigation strategies, requiring payment of some \$1400 each year for 15 years. This is completely inappropriate given that the CHRMAP is preliminary and flawed, and, by its own admission, may be making predictions that are materially different to what eventually transpires. Whatever mitigation measures may be eventually decided upon, after proper engineering study, should then be borne by all those who benefit from the amenity that the beach provides – in the case of Peppermint Grove Beach being those from the whole Capel Shire and further inland, in addition to the local ratepayers.</p>	

C032				<p>We advise that we request that Council rejects the CHRMAP due to the proposed mitigation strategies, impact on Peppermint Grove Beach's amenity, property values and that the community of Peppermint Beach alone is required to pay a levy to mitigate erosion hazards. We note that under the Project Outcomes & Findings of the Developing Flexible Adaptation Pathways for the Peron Naturaliste Coastal Region of Western Australia Project, it is stated that: "Communication of the findings of the project to the wider community is crucial in order to build resilience and achieve a better outcome for the community rather than instigating panic;". So there can be no avoidance of doubt, communication of information and the intention of Council to the residents of Peppermint Grove Beach regarding this issue has been deplorable. This lack of communication has led to rumour, innuendo and to a degree of panic where some residents are considering selling as they believe their property values are at risk from rising sea levels in the near future and the impost of a climate change levy which will have a negative effect on potential buyers purchasing in the area. By failing to communicate effectively, Council have lost the trust of the residents of Peppermint Grove Beach. The Council CEO has stated that the Shire has raised awareness of this matter by providing social media, press releases, radio interviews, website information and an information session held at Peppermint Grove Beach. Not good enough. We have never received formal written communication from Council regarding this issue or any associated information. Council does not use these communication methods to forward residents its rate notices. One would feel that an issue as important and contentious as the CHRMAP would require written correspondence to ALL rate payers of Peppermint Grove Beach advising them of the information and any proposal by Council, along with meeting times rather than relying on word of mouth or social media. There are a number of absentee owners in Peppermint Grove Beach who would not have been, and are possibly still not aware of the proposal due to this poor communication. We also note that City of Busselton provided a far longer period for residents to submit a submission than Shire of Capel. It seems to be like a form of Corporate bullying that the Shire is trying to rush through a proposal without allowing due process to occur in order to acquire a cash grab.</p>	<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required including engagement with local stakeholders and community members, before implementation of adaptation options on the ground.</p> <p>The methodology prescribed by SPP2.6 has been used to come up with a conservative allowance for coastal hazards so it can be used to identify vulnerable assets and plan for their adaptation. The method is not structured to come up with the best estimate of shoreline position at a given timeframe. The process is based upon the best available data and represents a conservative estimate that includes allowance for uncertainty, using sea level rise values and allowances for erosion prescribed by the Department of Transport. In order to refine coastal hazard allowances, the CHRMAP data collection and investigation recommendations can be implemented. Other implementation actions are trigger based, which the coastal monitoring can assist with.</p> <p>Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines.</p> <p>A 2021 report by the Insurance Council of Australia (https://insurancecouncil.com.au/resource/actions-of-the-sea-vulnerability-study/) notes: "It is not standard practice for insurers to offer cover for Actions of the Sea globally. There is currently a lack of data and knowledge to understand the risks, and until there is a better understanding of these risks, insurers will be unable to adequately assess, quantify and consider underwriting. Even then, there is no guarantee that insurers would be able to provide products to cover Actions of the Sea. We recognise that Actions of the Sea present broader community issues, and that there is considerable uncertainty about the best way to address these risks. Many communities are at risk now, as a significant amount of property and assets have been built in exposed areas around Australia's coast."</p>
				<p>We draw your attention to another finding of the Peron Report: "A long term approach has been identified as the best way to address coastal erosion and inundation – there is no need for short-term ad-hoc decisions;" We feel it is unfair that decisions are being made on assumption, that events will occur in 15 years or 97 years from now, with no guarantee that they will even take place and that we have to pay a levy to support projects which may not even be required. Who will be accountable for these decisions?</p>	
				<p>Page 2 of the Capel to Leschenault CHRMAP contains the following disclaimer: Water Technology Pty Ltd does not warrant this document is definitive nor free from error and does not accept liability for any loss caused, or arising from, reliance upon the information provided herein. It appears not even the Consultant is overly confident in the accuracy of their report. Not even they will be held accountable for their assumptions.</p>	
				<p>Our residence is approximately 20 metres above sea level and 260m approx from the ocean. On assumption based in the report, the sea will be lapping at my driveway in 100 years time. Should this actually occur, then Busselton, Dunsborough, Mandurah, huge parts of the metropolitan area and the Perth CBD will not exist and no amount of money spent on projects will be able to prevent a rise of this magnitude In addition it is interesting to note the following on page 2 of the Capel to Leschenault CHRMAP Report.</p> <p>It is acknowledged that the hazard identification component of the present study was undertaken to provide a broad understanding of exposure that can support government planning at a regional level. The hazard identification may be superseded by future site-specific studies, particularly at the estuary/inlet and along the river courses. Results derived from this study should not be over-interpreted at a micro-scale due to the assumptions applied and the limitations in resolution. The science is always changing. 50 years ago we were being taught that Earth was entering a new ice age, that the world would run out of oil in 1976 and that Y2K was going to wreak havoc. None of that occurred. Further monitoring and investigation is required to be proactive rather than reactive. Also, the beach is not just used by the rate payers of Peppermint Grove Beach. It is used by tourists and also other residents of Capel Shire. Should we be requested to pay a levy, then all non residents of Peppermint Grove Beach need to be charged an entrance fee to enjoy the facilities we are paying to preserve for their enjoyment or use.</p>	
				<p>The Peron Report also makes it clear: " measures are only successful if they are addressed and undertaken on a regional and state level – if Busselton builds sea walls, Mandurah and Rockingham will erode faster" Local Councils cannot address climate change issues on an individual basis. All projects must therefore be paid for and coordinated at either State or Federal level in order for them to be successful. The Shire has provided no information as to how these projects will be co-ordinated. The Shire cannot effectively install a swimming pontoon at Peppermint Grove Beach without issues, however it expects ratepayers to trust them to manage major coastal engineering works.</p>	

					Climate change is the responsibility of all citizens on this planet, not just those that live near coastal areas. Climate change not only involves sea change levels, but includes higher bush fire risk, drought, severe storms and impact to the natural environment. We note that City of Busselton does not charge a levy to residents who live close to the beach but allocates a percentage of all rates collected throughout the Shire to future climate change associated projects. This is a far more equitable system and should be adopted in some form at a Federal level so that all citizens of this country contribute to climate mitigation....including the big polluters most at fault for its cause. This could easily be done by allocating a percentage of fuel levies collected by the Federal government to specifically address these projects. It is the Federal Governments responsibility to implement response to climate change at a national level. They are the ones that set emission targets and sign international treaties not local government. Similarly, the State Government could also apportion a share of Iron Ore Royalties towards climate mitigation projects.	
					We also question the legality of Local Government being able to raise a levy to subsidise interests which are of national and state value. It is our understanding that management of the Capel Cut is not the Capel Shires responsibility and the foreshore reserve is Crown Land. Rate payers of Peppermint Grove Beach and the Shire of Capel should not be funding any mitigation works associated with these assets. We will strongly resist any attempts to impose a levy solely upon the ratepayers of Peppermint Grove Beach to pay for Climate Change Mitigation projects. Apart from adversely affecting property and insurance values, it is unfair, unjust and totally inequitable that we should alone be penalised for an issue that is a global problem requiring a global solution.	
C033					I was at the presentation meeting re the above. I came away with the impression that not enough research has been conducted. That many assumptions in the hypothesis of what may happen in 100 years was seriously flawed. As a Geography teacher for over 30 years the whole global warning arguments are very controversial. No one can seriously suggest what the coast will be in 100 years.	Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required including engagement with local stakeholders and community members, before implementation of adaptation options on the ground. The methodology prescribed by SPP2.6 has been used to come up with a conservative allowance for coastal hazards so it can be used to identify vulnerable assets and plan for their adaptation. The method is not structured to come up with the best estimate of shoreline position at a given timeframe. The process is based upon the best available data and represents a conservative estimate that includes allowance for uncertainty, using sea level rise values and allowances for erosion prescribed by the Department of Transport. In order to refine coastal hazard allowances, the CHRMAP data collection and investigation recommendations can be implemented. Other implementation actions are trigger based, which the coastal monitoring can assist with.
					Every time man intervenes with nature, eg. rocks to stop inundation, as suggested, other issues arise from unforeseen impacts. The Shire will not do this until it is necessary, if necessary in your 100 years timeline.	
					I object to the idea that what may or not happen in Peppy is based upon what has happened in other areas researched eg winter flooding in Augusta & what is happening at Ledge point. Both presented as examples at the presentation.	
					I object to the findings being backdated to classify Peppy as extreme for inundation. People living here, very close to the ocean, for nearly 50 years pointed out that has not happened & is not happening. This will impact our insurance and house values. This is very unfair based upon flawed & incomplete research & possibilities in 100 years. Also I object to paying a levy for the same reasons.	
C034					I have received today, the letter re above at my Perth address. I am disappointed that the consultation did not include all rate payers affected. My concerns relate to the Shire and executive decision making in recent years which will now likely result in me selling and choosing another coastal address:	Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required including engagement with local stakeholders and community members, before implementation of adaptation options on the ground. The original 8 week comment period was extended to 12 weeks following requests from community members.
					1.Poor communication and consultation, almost accidental in approach, and proposed significant costs including the nearly doubling the rates for the next 15 years to subsidise the future potential coastal hazards, the spit of cost across residential, commercial and rural seems questionable. The information referred to in the letter on the council website is hard to access, I gave up, a link in the letter may have been useful!	
					2.The unilateral decision (with token 'consultation') to make Peppermint Grove Beach dogs on lead AT ALL TIMES - which is crazy when the beach is barely populated outside of the short peak season of late Dec to mid-January, the reason for me purchasing my property at 12 Periwinkle Place was to have a quiet beach home to enjoy taking my social dogs to the beach and swimming, this has severely been curtailed for no obvious benefit as when ever we are down at the beach we very very rarely see another person. I suggest the council relook at engaging with residents to achieve a win-win, previous peak period was onlead and off lead year-round otherwise.	
					Unless I see an effort of counselors/CEO's engaging I will leave, I note a number of other locals are feeling the same way, I will be looking to exit. A very dissatisfied rate payer.	
C035					I agree with the contents of the submissions made by Bernie Masters. See C009	See Response for C009

C036	Table 4.1 Summary Page 30 of Coastal Hazards				1.Many manhours and great expense has produced data which is a “crystal ball” prediction for 97 years time. No-one can predict that far ahead. 2.What are the Water Technology experts planning to undertake to combat this summation. 3.If there is such a concerning prediction relating to erosion and inundation, why was the development and purchase of land parcels in question, allowed? 4.If you are predicting inundation via the Capel River, I would like to suggest the Water Board stop digging out the river mouth and let it find it’s own trajectory. It tries every year, but man interferes and tries to divert it to where it suits them – nothing to do with global warming. The area within the land depression behind the residential area has always been a “wetland”, via Mother Nature. 5.The threat of bushfires is a far more obvious hazard right now. 6.Introduced species plantings on the Peppermint Grove beachfront dunes are overtaking natural vegetation and jeopardizing natural dune protection. This problem is already out-of-hand and needs to be urgently addressed to allow for nature’s natural protection of these dunes. 7.Realistically, “Mother Nature will do what Mother Nature will do”. Respectively, we need to accept this and live alongside her. There are always hazards everywhere we live. 8.In the past 50 years of our presence in this area – nothing of a detrimental standard relating to coastal hazards, has occurred - except man’s interference in diverting the river mouth. 9.Again, with all your data, what are you actually proposing to do?	Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required including engagement with local stakeholders and community members, before implementation of adaptation options on the ground. Preparation of an updated foreshore management plan has been recommended. The methodology prescribed by SPP2.6 has been used to come up with a conservative allowance for coastal hazards so it can be used to identify vulnerable assets and plan for their adaptation. The method is not structured to come up with the best estimate of shoreline position at a given timeframe. The process is based upon the best available data and represents a conservative estimate that includes allowance for uncertainty, using sea level rise values and allowances for erosion prescribed by the Department of Transport. In order to refine coastal hazard allowances, the CHRMAP data collection and investigation recommendations can be implemented. Other implementation actions are trigger based, which the coastal monitoring can assist with.
C037				As the co-owner of 7 Ocean Blue Loop Peppermint Grove Beach WA I oppose the levy and action for the CHRMAP	Submission noted.	
C038	p 49	ratepayer		SECOND SUSMISSION: I totally object to paying a levy or rate increase based on the possible effects of climate change. Climate change has been with the human race since the dawn of time!	Submission noted.	
	Table 75	Suggested Levy	The suggested levy of \$1396	A state government or federal response required. Not local government!		
	p 30	Suggested Levy				
	Table 4-1	Suggested Levy				
C039				Include City of Busselton as this Shire needs to be part of this hazard risk management SECOND SUBMISSION. This is the second comment I have sent on this issue.The report is supposed to give an integrated understanding of our coastal area and the impact the future may bring. This report covers the City of Bunbury and Shires of Capel, Dardanup and Harvey. Now why was the City of Busselton not included has this City’s coastal erosion and inundation issues directly impact on Capel Shire, Forrest Beach and Peppermint Grove Beach. The original path of the Capel River ran along the water course at the back of the dunes at Peppermint Grove Beach existing the wet lands at Wonnerup.	The City of Busselton prepared and released a CHRMAP in October 2022 and it is available online here: https://yoursay.busselton.wa.gov.au/chrmap Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required before implementation of adaptation options on the ground. Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines. Other aspects of the submission are acknowledged and will be considered in future coastal management, but are considered outside the consultant’s scope of work for this project.	

	p 30	Table 4-1		Section of community singled out. This is not the sole responsibility of these rate payers. Climate change is everyone's concern.	All the homes/blocks that are affected by this proposed levy have planning permission from both Department of Land Administration and Capel Local Shire government. So why are we being discriminated against. The planning permission that they received is the same as the rest of the Shire?? So why is this not a problem for all shire rate payers? This proposed levy, is a huge impost on these Peppermint Grove Beach Rate Payers, (\$1396.00) for a climate event that may or may not happen. The time frame for each levy is 15 Years. When these homes and blocks were purchased by the ratepayers, they did so thinking that they had only their rates to pay. Now they are in the firing line of being slugged another \$1396.00.	
					Very little consultation was given to the publication of this document and its impact on residents. Yes, the Shire may say that it was published on their website, or facebook or some other social media. Or in some newspaper that no one reads. But, until the residents of Peppermint Grove Beach raised the issue, the rate payers had not been notified. No Good Enough!	
					I am total opposed to this levy, I have lived in Peppermint Grove Beach for over 50 Years.	
C040					We received a letter dated 25 May 2023 informing us of this draft after preceding weeks of rumours, scaremongering and distorted facts circulating that were extremely stressful and had council notified us in writing in the first instance, this could have been avoided. Before this I went to council as we were totally unaware of these proposals, and was told that all the relevant information was on the website, social media and community information sessions. That response was not satisfactory, not everyone spends every waking moment on the internet and social media. There is never a problem posting the rates out. Something as important and potentially life changing should have been posted out in the first place and a lot of angst could have been avoided. We have read the documents on the website of the Peron Naturalist Partnership now that we have been made aware of their existence, we have chosen to comment directly to council and wish our views to be noted.	Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines. Other aspects of the submission are acknowledged and will be considered in future coastal management, but are considered outside the consultant's scope of work for this project.
					I am a lifetime Capel Shire resident, my husband and I are landowners/residents of Peppermint Grove Beach for the last 27 years and we are incensed at the proposals being considered. How can it possibly be fair to expect private land owners to pay 9%, or any amount for that matter, whether it be levies or a specified area increase in rates to support these implementations? Why should we be forced to fork out vast amounts of money just because we live here, when anyone from anywhere, the southwest, the rest of the state, the rest of the country or even overseas for that matter can just come here, walk on our beach, swim at our beach, enjoy all the recreational and lifestyle benefits of our beach and community, then leave, not pay a cent, and be oblivious to the fact that the locals that live here have to pay for that? We find that both ludicrous and offensive. We get NO value for money from our rates here, and we strenuously object to any increase to cover these proposals given the massive amount we pay as it is. And as for user pays, how on earth do you expect to police that? We can't even get rubbish bins at our beach accesses for all the townies/tourists that come here and abuse our beach with their rubbish and mess, it is left to us locals to clean up after them, and now you expect us to pay for that as well? Where exactly do you think people are going to find this money? We are self funded retirees on a fixed income battling unprecedented inflation as it is, and what about the young people in our community and families with mortgages struggling with record interest rate rises and the cost of living spiraling out of control? As council is meant to represent and carry out in its ratepayers wishes, kindly note that we do not support these proposals whatsoever, the rates that we pay and the taxes that we have paid and are still paying, should more than cover whatever is deemed necessary. And obviously, as this is only a draft, there will be more feasibility studies, projections, consultants salaries, administration costs, ect ,ect, ect so god only knows how much money will be swallowed up on red tape before a single cent is ever spent on any sort of coastal change.	
C041					SECOND SUBMISSION. Please see the attached letter (Note: No Attachment, but assume it was Bernie Sanders letter). Immediately the Shire needs to declare the status of the CHRMAP as draft as that is what I hear now that the intention of releasing it was – not as a "Done Deal" which has all of us in Peppermint Grove Beach up in arms.	Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required including engagement with local stakeholders and community members, before implementation of adaptation options on the ground. Preparation of updated foreshore management plans has been recommended.
					Then someone needs to go away and create a valid report based on valid, credible and reliable set of evidence. After that a long-term plan needs to be created that incrementally starts to deal with the issues. I tried to upload a letter, but the file size is restricted in your system too much.	

					<p>Recently, staff from DBCA has been working on the sand dunes in the vicinity of the path from the Mindalong Beach car park over the dunes to Mindalong Beach. They did some cursory work on the path itself but mostly stabilising the sand dunes against blowouts caused by foot traffic by people avoiding the hazardous steep path from the seaward lookout down to the beach. This is the classic situation of placing an ambulance at the bottom of a cliff, instead of a fence at the top.</p> <p>If the steep path down to the beach was made less hazardous, people would not climb down the dunes to avoid it. I have seen people having to assist their dogs to climb up the big benches made in the sand on the path. At the bottom, fabric with big spaces has been pegged in over the sand benches, making it difficult not to trip over toes caught in the fabric. The obvious solution is to install proper steps on the steep part of the track.</p>	
C042					<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required before implementation of adaptation options on the ground.</p> <p>Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines.</p> <p>Other aspects of the submission are acknowledged and will be considered in future coastal management, but are considered outside the consultant's scope of work for this project.</p> <p>The City of Busselton prepared and released a CHRMAP in October 2022 and it is available online here: https://yoursay.busselton.wa.gov.au/chrmap</p> <p>SECOND SUBMISSION. I reside at Peppermint Grove Beach and was overseas during May 2023 when I first heard of the CHRMAP proposal. Due to being overseas, I was unable to attend either of the meetings held at Peppermint Grove Beach. However, I did respond on the relevant page of the CHRMAP although never received confirmation of it being received and was unable to copy it or keep a record. I therefore am emailing a response below so I have a record:</p>	
					<ul style="list-style-type: none"> •The proposed increase in residents rates is unfair and will be of no benefit to a lot of current residents as they are unlikely to live long enough to see any action taken. 	
					<ul style="list-style-type: none"> •Why is the levy not spread out to include Busselton as it is more low lying, being susceptible to flooding from both the sea and the wetlands? 	
					<ul style="list-style-type: none"> •I moved to the eastern side of Peppermint Grove Beach as it is on the gentle shores of Geographe Bay and more elevated than surrounding areas. I took into account the climatic changes up to now and foreseeable, and saw little threat to this area for my lifetime and beyond. 	
					<ul style="list-style-type: none"> •I am concerned that, to my knowledge, the Shire declined providing wheel chair access to the local beach. 	
					<ul style="list-style-type: none"> •I am concerned that, to my knowledge, the Shire do not do controlled burn offs/care of the Ludlow forest. 	
					<ul style="list-style-type: none"> •I am also concerned that, to my knowledge, the Shire has not suggested building a second access/exit to Peppermint Grove Beach for emergency purposes. 	
					Putting these later two issues aside, although more threatening to the general public, I feel that until there is any action taken rate payers should not be held accountable.	
C043					<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required before implementation of adaptation options on the ground.</p> <p>Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines.</p> <p>Land-use planning recommendation LU5 describes the intention regarding notifications on titles.</p> <p>Other aspects of the submission are acknowledged and will be considered in future coastal management, but are considered outside the consultant's scope of work for this project.</p> <p>I have been unable to fill in the comment form online and request that the comments below be accepted as a comment regarding the CHRMAP as it relates to Peppermint Grove Beach.</p> <p>I am a property owner in Peppermint Grove Beach, however, mostly reside in Perth and only became aware of this study/recommendations thanks to the Capel Shire kindly sending me a letter to my Perth address (thank you Capel Council – without this I would have known nothing about proposals that will affect me).</p>	
					The communication around this issue is very poor. What everyone needs to know before they are asked to comment is: How will this actually affect my property and me?	
					I gather there is a proposal to ask property owners to pay additional rates or a levy of around \$1,400 for about 15 years. What I do not know (and can't work out from the information provided), is which property owners are impacted, for how long and from what date?	
					In any event, I don't think a levy on individual property owners is fair. Responding to climate change is an overall responsibility for our state/country at large.	
					I also wonder why the State Government's property tax (that we already pay on our property in Peppermint Grove Beach), and the stamp duty raised from house sales in the area, cannot be diverted to this cause rather than imposing yet another tax/levy.	

					I am aware that there are people who have retired in Peppermint Grove Beach who now have fixed retirement incomes (and not a lot spare). These people have carefully budgeted for their retirement – a new imposition of \$1,400 a year (\$21,000 over 15 years) on people such as these is really unfair. Would there be a means test? Will there be some sort of relief for those who simply cannot afford it – or will they be forced to move? In summary my comments are:	
					Insufficient information and explanation has been given to property owners. No decisions should be made that adversely impact upon the interests of property owners without them being fully informed. They should each be sent a letter that sets out the proposed impact <u>upon them</u> (including whether they will be subject to a levy, and if so, how much and for how long). They should then have the chance to comment from a more informed position.	
					•A levy or any additional tax on individual property owners for a societal problem is inequitable.	
					•The responsibility to address the consequences of climate change rests with the entirety of our country/state not individuals. At a state level we do have a surplus at the moment – perhaps this should be put aside now (a future fund) and allocated for mitigating the adverse impacts of climate change including, but not limited to, its impact in coastal areas (for example, there will be other impacts such as an increase in bush fires – and this risk needs to be mitigated and paid for as well). An example of a more equitable levy is the Emergency Services Levy that applies to all property owners in WA, not only those in areas more vulnerable to fire, flood etc.	
					I am not sure of what is suggested be done regarding 'notations on titles'. However, again, those impacted by this proposal should be individually informed of exactly what is proposed to be added to their titles and have the opportunity to comment on this (and perhaps to discuss with their local MP). Thank you for your consideration of my comments.	
C044					I am a property owner at Peppermint Grove Beach. I feel I haven't been provided with anywhere near enough information & have only recently found out about this recommendation. I strongly object to levies being on property owners & oppose any being placed on land titles. This has not been a reasonable process & it appears to be an attempt to impose levies by stealth.	Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required before implementation of adaptation options on the ground. Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines.
C045					I firmly support the reasoned and reasonable submission to the CHMAP made by Bernie MASTERS which I have attached. The requirement for more research and investigation into the issues which are based on older data is imperative for any sort of planning and assessment to be made. To make any form of costing or levee assessment at the moment is unrealistic and to any sort of levee commitment without having an agreed strategy for the uses an allocation of such moneys is irresponsible and, dare I say it. Politically suicidal! More research, more data gathering and more consultation over the next few years at least is the only rational approach. That this has been brought to State, Shire and resident level is commendable but this must be seen as a first conciousnes raising exercise to start the dialog, not a basis on which to make decisions	Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required before implementation of adaptation options on the ground. The CHRMAP has been completed using best, currently available information. The purpose of the project is to conservatively identify an allowance for coastal hazards to allow identification of vulnerable assets to inform future planning and risk management. High-level concept design work has been undertaken to allow budget estimates. Further consideration of the local coastal processes, design and costs is required before these recommendations can be progressed to seek funding, environmental impact assessment and approvals/endorsement. It is recommended further localised engagement takes place through this process, including with local stakeholders and community members. Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines.

C046				<p>Thank you for the opportunity to provide feedback on the draft Coastal Hazard Risk Management and Adaptation Plan. We purchased 2 McCourt Pl Peppermint Grove Beach in 1985 through the Tabitha Trust which was set up for the benefit of the extended Watson family. The property is used by family and friends on a regular basis and we plan to keep it long term for generations to come.</p> <p>The property is one of the few properties in Peppermint Grove that is absolute beachfront, and we understand the implications of this as the climate changes. It is for this reason we have chosen not to redevelop the site and keep the existing small structure at the rear of the block. The property includes the sand dune in front, and we have made a concerted effort to rehabilitate this area to ensure it is stable.</p> <p>The draft CHRMAP is very comprehensive and we are generally supportive of the recommendations it makes to ensure the coastline is protected. It is our understanding that the report recommends possible voluntary acquisition of properties that the hazard line identifies as vulnerable. Though we have no issues with voluntary acquisition, we do not support compulsory acquisition. We believe ensuring property owners manage their property in a way that reduces the risk of erosion is preferable to forced acquisition. Our property may well be identified as vulnerable, but we are able to ensure the property and sand dune is maintained effectively to mitigate any erosion risks.</p> <p>In summary, we understand the need to protect the coastline, and are pleased that shires and councils including the Capel shire are being proactive in this regard. However, we ask that the shire take the responsibility of balancing residents needs against the challenge of protecting the coast very seriously. The community should be allowed to retain property ownership while being empowered by the shire through support and regulation to be a part of the solution.</p>	Submission noted.
C047				<p>There are many concerns regarding the options and recommendations put forward in this final CHRAMP. This is written in response to three of those recommendations. On behalf of the estate of M.A.A.Hill, we would be grateful if you would acknowledge and respond to our concerns.</p>	<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required before implementation of adaptation options on the ground.</p> <p>Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines. Benefit Distribution is only consider to apply where hazards are adapted to by protecting assets, whereas voluntary acquisition applies when managed retreat from hazards is proposed.</p> <p>Multi-criteria assessment of options is detailed in the Risk Evaluation and Treatment Chapter Report.</p>
				<p>1. Addressing the issue of funding the CHRAMP project through increased rates for property owners in Peppermint Grove Beach, paying an increased levy of \$1,396.00 (CHRAMP, p. 49) to continue at least until 2035. This recommendation is selective and could be problematic with legalities involved, especially if properties undergo Compulsory Acquisition.</p>	
				<p>2. There is a major concern regarding 8.1.1.3 Compulsory Acquisition which states that property may be subject to "Compulsory taking by the LGA without agreement under Section 191 of the PD Act coupled with the Land Administration Act (1997)" (CHRAMP, p.55).</p>	
				<p>3. In consideration of coastal erosion, groynes can be problematic and cause ongoing costs (eg. Busselton with weed build up and consequent odour issues; Mandurah with yearly sand dredging). In the short to medium term timeline, the coastline is more vulnerable to storm surge damage than sea level rise. Would it be more appropriate and favourable (aesthetic impact and costs,) to address this issue with artificial reefs (PR4) and offshore breakwaters (PR5) as barriers (CHRAMP, p.43)? It is unclear why these have been deemed red, and (in)Voluntary acquisition deemed green and recommended for further investigation.</p>	
				<p>Regarding long term planning and management of coastal erosion, this would be assumed more appropriate to be funded from a State and Federal level, rather than through local government.</p>	
C048				<p>Please accept this as my general comment submission in relation to the above. I reside at 21 Cape View Lane, Peppermint Grove Beach and have lived in Peppy since 1995. When it comes to Climate Change and Global Warming, I retain an open mind on the extent of influence that the human race is having on the issue. I consider it is important that we protect communities that are impacted by all of the different effects of global warming.</p>	<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required before implementation of adaptation options on the ground.</p> <p>Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines. Benefit Distribution is only consider to apply where hazards are adapted to by protecting assets, whereas voluntary acquisition applies when managed retreat from hazards is proposed. Protection options which lessen the impact of hazards are considered more suitable to seek funding contributions from landholders (public and private) who benefit from the reduced impacts.</p>

				<p>I do however consider that there is a fundamental flaw when it comes to the proposition that has been tabled. (In this case) the people who are most influenced by erosion (which is most likely caused by the effects of global warming) are being asked to contribute towards the cost of prevention, to a greater extent than anyone else. The people who live close to the coast are not the sole instigators of climate change. They are however potentially impacted more than others, due to circumstances not within their control. So, why penalise them.</p> <p>We are in this together.</p>	
C049				<p>Thank you for the opportunity to comment on the draft Capel to Leschenault Coastal Hazard Risk Management Adaptation Plan (CHRMAP or the Report).</p> <p>Please let me take this opportunity to introduce myself. I am a 30 year resident of Peppermint Grove Beach and geologist by profession. I graduated with a Master of Science in geology and geophysics from Curtin University in 1990, a University that specializes in sedimentology which includes coastal processes.</p> <p>The Report being tabled appears to be in draft form and it would be beneficial to know when the final version will be available for review. Considering the significant implications of some actions called for in the draft CHRMAP it would seem prudent to await the final version rather than commenting and making decisions on an incomplete and potentially flawed document. For example, some of the tables make mention of 2020 – 2035 timelines with respect to ratepayer levies, which suggests that data, assumptions and recommendations are already dated.</p> <p>Further comments will focus on Peppermint Grove Beach but in some instances apply to the entire area under investigation.</p>	<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required before implementation of adaptation options on the ground.</p> <p>We note that there have been some concerns on the methodology, the hazard maps, and what it means for the Capel community in terms of implementation, which is understandable. This is the reason why public consultation is a key component of any CHRMAP project, so that issues can be identified and hopefully by working together, sustainable solutions can be planned.</p> <p>The methodology prescribed by SPP2.6 has been used to come up with a conservative allowance for coastal hazards so it can be used to identify vulnerable assets and plan for their adaptation. The method is not structured to come up with the best estimate of shoreline position at a given timeframe. The process is based upon the best available data and represents a conservative estimate which includes allowance for uncertainty, using sea level rise values and allowances for erosion prescribed by the Department of Transport. In order to refine coastal hazard allowances, the CHRMAP data collection and investigation recommendations can be implemented. Other implementation actions are trigger based, which the coastal monitoring can assist with.</p> <p>In summary the CHRMAP has been completed using best, currently available information. The purpose of the project is to conservatively identify an allowance for coastal hazards and allow identification of vulnerable assets in order to inform future planning and risk management.</p> <p>High-level concept design work has been undertaken to allow budget estimates. Further consideration of the local coastal processes, design and costs is required before these recommendations can be progressed to seek funding, environmental impact assessment and approvals/endorsement. It is recommended that further localised engagement takes place through this process, including with local stakeholders and community members.</p> <p>Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines.</p>
					<p>Other aspects of the submission are acknowledged and will be considered in future coastal management but are considered outside the consultant's scope of work for this project.</p>
				<p>GIS Cartography</p> <p>Without going into too much detail about the content of the CHRMAP and a debate of whether or not the right approach has been used I would like to make one important observation regarding the GIS methodology employed to predict future water/storm levels.</p> <p>Geographic Information System (GIS) cartography has been employed to great effect in creating maps for the report. As part of the map creation the GIS has been tasked to draw buffers on a regional scale at set distances along the coastline. This is all done by computer programs within the software itself. While this method, referred to as unsupervised modelling, can assist in identifying major problem areas, at the local level it becomes problematic and must be treated with caution.</p> <p>This becomes particularly apparent at Peppermint Grove Beach, where the computed 2120 erosion line encroaches upon the secondary dune system on which the majority of existing residential lots are situated and which in many cases is situated 12 meters or more above the current sea level.</p> <p>To accept these computed lines as fact is flawed science and if accepted is a potential erroneous oversight that has far-reaching implications that could greatly influence major policy decisions. It is recommended that the Shire of Capel engage relevant qualified consultants to conduct a diligent supervised modelling GIS exercise that includes detailed coastal elevation data and underlying stratigraphic data as a minimum before accepting current proposed future coastlines presented in the report.</p> <p>In order to maintain the report's credibility and align it with the currently accepted scientific evidence, I strongly recommend that the Shire subject the report to an independent peer review. This review should be conducted by a reputable and impartial third-party, preferably a separate company, which may even be considered a competitor. By subjecting the report to such scrutiny prior to its final acceptance and use in policy decisions, we can ensure its accuracy and reliability.</p>	

			<p>In Western Australia, erosion management in coastal areas, including foreshore reserves, is addressed through various laws, regulations, and guidelines. It needs to be established what the legal implications for the State or relevant authority are where it fails to protect State owned titles effectively from erosion and this failure eventually impacts privately owned land.</p> <p>The following section refers to Peppermint Grove Beach (MU1) specifically.</p> <p>The Report neglects to mention the presence of Crown/State-owned land parcels that buffer the oceanfront properties from the beach. Lots owned by the Crown/State of Western Australia are referenced in Table 1. This land is currently zoned 'Recreational Use' but recommended in the report to be rezoned 'Foreshore'. The purpose of the rezoning is unknown and I would suggest that the public should receive an explanation behind the reasoning of this recommendation.</p> <p>SEE SUBMISSION FOR TABLE Table 1: 'State of WA' owned titled Lots along Peppermint Grove Beach foreshore buffering private landholdings from the beach</p> <p>A search of two titles in the above table (38214/6274 & 8684/5223) indicates that titles are Crown Land and vested to the Shire of Capel under a Management Order for the Purpose of Public Recreation. Given the latter it is uncertain who is responsible for erosion control of the above strip of land and more to the point, the funding of said controls. The Crown/State owned strip provides a critical buffer to the private lots along the oceanfront and should therefore be protected by the relevant titleholder.</p> <p>The CHRMAP's current modelling suggests that by 2050 some of the State's titles will disappear completely along the foreshore and start to impact private Lots. As the Crown/State of Western Australia is the owner of the land in question the argument can be put forward that the State is ultimately responsible for erosion control and not currently unaffected private property owners immediately to the east. In other words, the State as a collective whole should be responsible and accountable for any erosion control measures that are or aren't put in place.</p> <p>It would seem advisable to consult with a legal professional who specializes in land and environmental law in Western Australia to obtain specific advice tailored to the situation in</p>	
			<p>The Shire of Capel may or may not be aware that the recommendation of retreat in the draft Report for Peppermint Grove Beach does not reflect the viewpoint of the majority in the local PGB community.</p> <p>I am therefore proposing the establishment of an advisory panel or similar platform specific to the coastal hazard risk, between the Shire of Capel and the Peppermint Grove Beach community to ensure active community involvement, foster transparent communication, and gather valuable feedback regarding erosion control measures at Peppermint Grove Beach. This collaborative initiative aims to keep the community informed on a regular basis and provide them with a platform to contribute their insights and concerns throughout the decision-making process.</p> <p>Peppermint Grove Beach holds significant importance to the local community, and it is essential to engage community members in discussions about the erosion challenges and potential solutions. By establishing a task force or advisory panel, we can establish a formal mechanism for ongoing communication, exchange of information, and solicitation of community feedback. The panel should be independent of the Peppermint Grove Beach Community Association.</p> <p>The proposed advisory panel would have the following key objectives:</p> <ol style="list-style-type: none"> 1. Open Communication Channels: Facilitate regular and transparent communication between the Shire of Capel and the Peppermint Grove Beach community regarding erosion control measures. This will involve sharing updates, progress reports, and relevant information to keep the community well-informed. 2. Community Input and Feedback: Provide an avenue for community members to express their opinions, concerns, and suggestions regarding erosion control measures. This could be through town hall meetings, public consultations, surveys, or dedicated feedback sessions. 3. Knowledge Sharing: Foster an environment of knowledge exchange and collaboration by sharing scientific studies, expert insights, and best practices related to erosion control. This will enable community members to make informed contributions to the decision-making process. 4. Collaborative Decision-Making: Engage community representatives, environmental experts, 	

				<p>Given that similar challenges have been addressed successfully in various locations worldwide, it is difficult to believe that our coastline cannot be protected effectively and economically using existing off-the-shelf soft engineering solutions for at least the next 100 years in a similar landform to what exists in the present day based on the projected sea level rise in the Report.</p> <p>It is beyond the scope of this brief to address the latter, suffice to say, Peppermint Grove Beach is situated in a relatively low-energy coastal environment at the top of Geographe Bay which further supports the possibility of finding suitable protective measures.</p> <p>In conclusion, I recommend the following actions to address the concerns outlined above:</p> <ol style="list-style-type: none"> 1. Address GIS Methodology: Resolve inaccuracies resulting from missing or low-resolution data by conducting a supervised modelling GIS exercise using detailed coastal elevation and stratigraphic data as additional inputs. 2. Peer Review: Arrange for an independent peer review of the CHRMAP by a reputable and impartial third-party consultancy. Open the report for public comment prior to its final adaptation. 3. Legalities of Flawed Recommendations: Seek legal advice to ascertain the implications of implementing flawed conclusions and recommendations, particularly regarding erosion control measures and their potential impact on private land. 4. Legal & Financial Responsibility of Erosion Control: Investigate who is financially and legally responsible to control erosion across land titles owned by the State of WA currently under a Management Order to the Shire of Capel. Assess legal and financial implications this may have if failure to protect State owned titles from erosion eventually impacts privately owned land. 5. Revision of Timelines: Update the draft report to reflect current timelines and financial projections. The draft report includes tables and timelines dating back to 2020 with proposed payments concluding in 2035. As the payments/levies have not been implemented to-date and it is now mid-2023, can we expect a 20% increase indexed to inflation for these numbers (i.e. 3/15years = 20%) 	
C050				<p>We are Peppermint Grove Beach residents and are very concerned that the Shire of Capel intends to use the CHRMAP to set local policy. We feel that the CHRMAP (as well-meaning as it is) should be considered nothing more than a theoretical academic study; it should certainly not drive council policy.</p> <p>It states "Community and stakeholder involvement is a critical component of the CHRMAP process" but this has not been achieved. Communication has not been effective, as demonstrated by the letter dated 25th May from the Shire advising of an extension to the comment period. A letter, by the way, that did not arrive until 13th June.</p> <p>Several of the risk treatment criteria set out in the document fail to meet the adaption criteria set out within the report.</p> <ul style="list-style-type: none"> • Coastal development must be sustainable in the long-term, and must balance the community, economic, environmental, and cultural needs. • Adaptation options should maintain future flexibility, in order to build resilient coastal communities. <p>There is currently a 'Cost of Living Crisis' and a shortage of rental property available. These issues have a larger more immediate impact on the resilience of the local community and its economic future than the theoretical possibility of inundation or erosion risk at some point in the next 100 years.</p> <p>Funding studies and finding ways of resolving these issues should be the goal of the Council if it wants to make more resilient, economically sound communities, not suggesting already stretched families pay additional \$1,396 per year for the next 15 years.</p> <p>Peppermint Grove Beach residents held a Community Meeting in response to the CHRMAP in which many concerns were raised, one of which resulted in this current extension to the Public Comment period, showing the adaptation criteria is failing in its goals to balance community needs.</p> <p>Some of the other points of concern we have with regards the report include:</p>	<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required before implementation of adaptation options on the ground.</p> <p>The CHRMAP has been completed using best currently available information. The purpose of the project is to conservatively identify an allowance for coastal hazards to allow identification of vulnerable assets to inform future planning and risk management.</p> <p>High-level concept design work has been undertaken to allow budget estimates. Further consideration of the local coastal processes, design and costs is required before these recommendations can be progressed to seek funding, environmental impact assessment and approvals/endorsement. It is recommended that further localised engagement takes place through this process, including with local stakeholders and community members.</p> <p>Notifications on Titles are expressly included as a management option in SPP 2.6. This is a management tool that helps to keep the community informed, and whilst it can be challenging, it is best practice to provide land owners and potential landowners with the best data available about their property. The Notification can only be placed through a statutory process, when a number of investment decisions about the property will need to be made.</p> <p>Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines.</p>
				<ul style="list-style-type: none"> • Action Item LU5 notification on Title of Land showing as 'No cost to the Shire'. This does not consider the cost to the property owner, or the negative impact on the property value, or the ability of the property holder to gain insurance following the change to the Title details. This should not be undertaken without significant further engagement with property owners and the cost implications considered beyond the 'No cost to the Shire'. 	
				<ul style="list-style-type: none"> • For MU1 the annual funds suggested for collection from private property holders comes to approximately \$21K over the next 15 years, whereas the collection of funds from all public or community assets is \$80K in total. The suggested funding of the scheme is heavily weighted on the local community residents and not to the much wider pool of users of the costal facilities; tourists, campers, 4x4 beach users, hotel guests, short term renters (Airbnb, Stayz etc). 	

				<p>• Based on the 4% NPV for MU1 (PGB) there is an allowance of \$13M for voluntary acquisition (PMR4), however current median prices are \$850k which would allow for 15 properties to be purchased (at current values), whereas the report states 203 would be at risk by 2120.</p> <p>Furthermore, we would ask the Council to provide the community, information regarding the process of commissioning of this study; what was the cost to the Rate Payer, what procurement processes were followed?</p> <p>We look forward to further engagement in this process and hope the Council focuses on some of the more immediate concerns of residents.</p>	
C051				<p>I am writing this submission as a resident and ratepayer at Peppermint Grove Beach (18 Campbell Road) within the Shire of Capel.</p> <p>I believe it is certainly most positive and important that The Council is working with CHRMAP in such forward planning. However I also think that any or some of the projections or conclusions drawn up in this document are preliminary and unsound.</p>	<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required before implementation of adaptation options on the ground.</p> <p>The CHRMAP has been completed using best, currently available information. The purpose of the project is to conservatively identify an allowance for coastal hazards and allow identification of vulnerable assets in order to inform future planning and risk management.</p> <p>High-level concept design work has been undertaken to allow budget estimates. Further consideration of the local coastal processes, design and costs is required before these recommendations can be progressed to seek funding, environmental impact assessment and approvals/endorsement. It is recommended that further localised engagement takes place through this process, including with local stakeholders and community members.</p> <p>Preparation of an updated foreshore management plan has been recommended.</p> <p>Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines.</p> <p>Other aspects of the submission are acknowledged and will be considered in future coastal management, but are considered outside the consultant's scope of work for this project.</p>
				<p>There are a number of specific assumptions in relation to Peppermint Grove Beach which are highly questionable. For example, longer term projections on local coastal erosion, without having conducted appropriate geological surveys, or having significant gaps in local longer term accounts of natural coastal weather assaults and outcomes.</p> <p>Data related to potential sea level rise over extended periods are also variable, not taken into account in the model here.</p>	
				<p>I find it highly questionable that based on the many assumptions in the CHRMAP and other information needed, that any case has been floated to suggest that a selective group, Peppermint Grove Beach ratepayers, have been nominated to raise funds?</p> <p>Firstly the back-up support data is unsound as referred to above.</p> <p>Also, there is no certainty that any of the possible mitigation options will be in any way effective or likely to be so.</p> <p>The Council itself has continued to construct infrastructure which according to the CHRMAP model would be seen at high risk of early inundation. Also, in terms of preservation of the local sand dunes the Council has not been obviously concerned. That is evidenced by recent clearing of foliage planting which had been conducted by residents.</p> <p>No action has been taken to try and reduce 4WD encroachment hard against the dune front in areas north of the PGB northern carpark. Activity such as this is identified generally a major clear concern to promote erosion.</p>	
				<p>Finally, I would doubt that it is legal for the Council to be the conduit to collect tariffs for this purpose from a specific residential group on behalf of their State Government. The broader argument on current governmental attitudes and policies affecting global warming are not to be discussed here.</p>	
				<p>In light of the above comments, I would in no way support that the CHRMAP proposals and trust that they will not be accepted by the Council in their current premature and unjust proposals.</p>	

C052				<p>Thanks for the opportunity to comment on the draft CHRMAP proposals. As a Dalyellup resident, I already pay a Special Area Rate levy for the upkeep of Parks and Reserves. My comment is that double SAR payments are not possible. The draft report should include the option at Dalyellup that the existing SAR levy should be directed away from Parks, and be used for funding for coastal erosion protection.</p>	<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required before implementation of adaptation options on the ground.</p> <p>Benefit Distribution Analysis assumptions and Beneficiary Pays principles are presented in the relevant appendices and referenced throughout the documents. The relevant State Government documents are the State Coastal Planning Policy Guidelines and the CHRMAP Guidelines.</p> <p>Other aspects of the submission are acknowledged and will be considered in future coastal management, but are considered outside the consultant's scope of work for this project.</p>
C053				<p>Thank you for providing me with the opportunity to comment on the above draft CHRMAP. I was not involved in the earlier part of the consultation process as I was an absent property owner in this area (house was rented out). Apologies for not getting back to you sooner as I realise this is the last day for input. It appears the main risk related to the CHRMAP for MU3 is 'Erosion'. Based on my review of the CHRMAP and personal feedback, my comments are below: Below are the aspects of the CHRMAP that I support: Coastal Monitoring (as described in the CHRMAP) o I support this measure on the basis of gauging the level of coastal erosion and protection measures needed to estimate the level of coastal maintenance required. o This should also include surveys of vegetation cover to scope out the level of restoration works required Managing foreshore reserves and coastal amenities (in context of repairing and restoring the ocean foreshore sand dunes) o There has been no maintenance/restoration for a long time (~10years), and the beach users have not kept off the sand dunes exacerbating erosion. o Restoration of the ocean foreshore dunes is essential in preserving and enhancing the existing natural vegetation. o Vegetation cover on the ocean foreshore dunes is essential in the structural integrity of the dunes and protection of wind and wave erosion o Maintenance and protection of existing amenities to keep beach users off the dunes o Restriction access to areas identified on the dunes for protection/revegetation I strongly support the protection measure PR2 Groynes, and other protection measures mentioned in the CHRMAP document</p>	<p>Edits have been made to the document to acknowledge its status as a strategic planning document and noting the future work required before implementation of adaptation options on the ground.</p> <p>Preparation of an updated foreshore management plan has been recommended.</p> <p>The risk management and adaptation hierarchy is set by State Government and not able to be adjusted for individual projects. The relevant State Government documents are the State Coastal Planning Policy, the Policy Guidelines and the CHRMAP Guidelines.</p> <p>Managed Retreat would occur by landward properties being acquired and rehabilitated into a foreshore reserve and public amenities to ensure that a sandy beach, vegetated undeveloped foreshore reserve and developed foreshore reserve are provided sustainably into the future.</p> <p>Other aspects of the submission are acknowledged and will be considered in future coastal management, but are considered outside the consultant's scope of work for this project.</p>
				<p>Below are the aspects of the CHRMAP that I do not support: Protection being the last in the preference hierarchy (Section 6.2, Figure 6.1) o My preference of order would instead be (highest preference from left to lowest preference right): Avoid☒ Protect☒ Accommodate☒ Planned/Managed Retreat Do Nothing (DN1) – this option to me would be unacceptable due to unmitigated impacts to the ocean foreshore dune vegetation and accelerated loss of foreshore Establishment of a program for Compulsory Acquisition of land where coastal hazard risk is deems intolerable for habitation – I do not consent to this measure</p>	
				<p>In broader terms, are the following important considerations for the community: Use and enjoyment of the coast is seen to be a key aspect identified in the CHRMAP It is clear to assume that enjoyment of the coast would be having public facilities and direct beach access (e.g. existing parking at Norton Promenade) at the back of the ocean foreshore coastal dunes There is no land available to replace the amenity/use the ocean foreshore dunes currently provides for due to the land. (Section 3.5, Table 3-4 MU3 – Dalyellup) The land between Gutmann Parkway and Norton Promenade is densely packed with houses which are outside and west of the 'Erosion Hazard Line 2120' Therefore, if the ocean foreshore coastal dunes were to be lost to coastal erosion, it is unclear as to how the current status of enjoyment/use the community currently experiences can be replaced? It appears that the position to 'minimise coastal process interference' is not consistent with • the protection of the ocean foreshore coastal dunes and the important environmental biodiversity it currently provides • the rights of the individual residential landholders who bought into this area to specifically enjoy the coastal amenity It would be much appreciated if you could please favourably consider these comments for addressing in the draft CHRMAP.</p>	