Proposed Amendment to the State Coastal Policy

RACT submission to the Tasmanian Planning Commission

August 2025

About RACT

More than 220,000 Tasmanians are RACT members. We are the largest and strongest member organisation in Tasmania and an award-winning Tasmanian owned insurance company.

Established in 1923, RACT is an apolitical and independent transport infrastructure, road safety and mobility advocate. We increasingly advocate on the impacts of a changing climate and supporting improved community resilience. We are committed to supporting and furthering the interests of Tasmanians and we do this through a comprehensive program of consultation, education, awareness and public advocacy.

RACT is represented by senior staff in a number of stakeholder reference organisations in Tasmania and undertakes structured liaison with government and other stakeholder groups.

Nationally, RACT is a constituent member of the Australian Automobile Association (AAA), which represents some eight million Australians, and is represented on the board of the Insurance Council of Australia (ICA).

RACT is a regular contributor to the committees and forums of the AAA and the ICA.

Internationally, RACT has joined with other Australian motoring organisations as a member of the Fédération Internationale de l'Automobile (FIA) to work on road safety and related issues at a global level.

RACT's advocacy and public policy activity is defined by a series of policy documents developed and endorsed by the RACT Board.

These policies have been informed by history, experience, research, statistical analysis, consultation, industry knowledge and most importantly, through regular engagement with our member community.

Submission

The RACT welcomes the opportunity to comment on the proposed amendments to Tasmania's State Coastal Policy 1996 by contributing this submission to the Tasmanian Planning Commission's assessment of the proposed amendments.

The Government has proposed three amendments to the State Coastal Policy, including introducing the concept of "tolerable risk".

These amendments should be considered in the context of changing weather events and long-term changes to weather patterns. Coastal areas are subject to sea level changes, especially when combined with intense rainfall, storms, storm surges and floods, which puts coastal and riverine communities at elevated risk.

As an island with significant coastal exposure risk, legislative, regulatory and policy changes to laws that govern society's relationship with coastal areas and our activities on and around them must be appropriate, measured, necessary and transparent.

We note that the existing Coastal Policy includes the precautionary principle and says its application "should be guided by… an assessment of the risk-weighted consequences of various options". We have factored this approach into our submission.

RACT is a leader in understanding Tasmanian risk and in particular the impact this risk has on economic and community outcomes. Over the past two years we have invested in further developing our expertise in this area. We provide the analysis below about property in Tasmania's coastal areas using data from the ListMAP to inform this assessment process.

Within Tasmania's current coastal areas there are:

- ~3,900 residential buildings (as classified by the List) in the Coastal Inundation Zone
    - 2,031 in the low inundation zone (vulnerable to storm surge by 2100)
    - 1,227 in medium inundation zone
    - 16 in the high inundation-band (vulnerable to sea-level rise by 2050)
    - 627 residential buildings in the inundation investigation-area
    - An estimated value of the residential properties in this zone is approximately $2.5bn.
- 3,162 sheds or shacks are built in the Coastal Inundation Zone
- 1,766 other building types, predominately commercial and accommodation, may be at greater risk than residential buildings, with an average floor area twice the size of the residential floor area.
- Where the year of construction is provided, it appears that the rate of construction in the inundation zones has halved since the 1990s but not ceased entirely. While this slowing rate of development is to be commended, we estimate the value constructed post-1990 is still $0.5bn.
- Section 4.2 of the March background report[1] provided to the Tasmanian planning commission provides an overview of the description of tolerable risk based on the *Practice Note Guidelines for Landslide Risk Management 2007*[2].
    - Approximately 300 new buildings were approved since 1996 that would meet the major risk threshold.
    - Approximately 400 new buildings constructed since 1996 would meet the catastrophic threshold as they are expected to be impacted by sea-level rise by 2100.

[1] Draft Amendment 01-25 to State Coastal Policy - Development of Actively Mobile Landforms Background Report provided to the Tasmanian Planning Commission
[2] Guideline For Landslide Susceptibility, Hazard and Risk Zoning For Land Use Planning

- Noting there are several references in the existing planning code on what “tolerable risk” specifically means, given the totality of an owner’s wealth embodied in their home, residential development in coastal areas should not be considered a tolerable risk.

RACT notes the inherent complexity in probabilistic terms of coastal areas and seeks to better understand each intended application of “tolerable risk” that is proposed to be introduced. Given multiple tolerable risk references and in conjunction with the Tasmanian Planning Scheme, further definition should be provided for clarity of what the “lowest level of likely risk” is that “tolerable risk” would be measured against.

It is important that tolerable risk is defined in a manner that enables a clear linkage to risk assessments that occur in the economic sector such as insurance and banking.

Lack of clarity on the definition could result in developments being approved in high-risk coastal locations that result in individual and community losses or costs. With coastal areas being at increasing risk of extreme weather, amendments that inadvertently result in the loosening of restrictions in high-risk locations would be imprudent. We are aware of coastal developments that, under the current scheme and due to this ambiguity, have no recourse from the inevitable catastrophic damage from coastal inundation events.

RACT understands that the proposed amendment 1.4.2 may result in a reduction of protections for actively mobile landforms, such as frontal dunes. It is unclear what the reason for these proposed amendments is, and we would welcome advice that clarifies this.

Coastal areas continue to be seen as attractive places to live, therefore there is a development pressure and demand to develop these locations. It is essential that policies that guide development consider the holistic social, economic and environmental impacts of planning outcomes. These policies should also provide transparent and meaningful information of current and future risks to the public.

To properly consider and understand Tasmania’s Coastal Policy in terms of its strengths, possible areas for improvement and if it meets the community’s current and future needs, we note that Tasmania’s 2024 State of the Environment Report recommends “a comprehensive review of Tasmanian coastal policy in response to the pressures and threats to natural and built coastal environments”.

Building a more resilient Tasmania that can adapt and respond to changing weather events will require clear planning policies that avoid development of high-risk areas. RACT believes that a review of Tasmania’s Coastal Policy would be a logical approach for our island community to comprehensively assess coastal risk and potentially identify new opportunities for resilience building.

Your sincerely,



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