



SCAGI - Seymour Community Action Group Inc.

PO Box 25 Bicheno 72159

9 May 2021

To the Section Head (Water and Dam Administration)
Water Management & Assessment Branch
GPO Box 44 Hobart TAS 7001

bill.shackcloth@dpipwe.tas.gov.au

Re: Objection to the granting of a works permit for an instream dam at Unnamed Tributary of Doctors Creek.

Dear Mr Shackcloth,

We wish to object to the above application for an Unnamed Tributary of Doctors Creek for Irrigation with a capacity of 295.9 ML, Wall Height 9.8 m for the following reasons:

- The proposed dam is not instream of the Unnamed Tributary of Doctors Creek but is in fact a freshwater tributary to Templestowe Lagoon. This is in error throughout the whole of the application documents. Templestowe Lagoon has a CFEV Estuaries – Integrated Conservation Value of: High.
- The advertised height of the dam wall is not 9.8 m but in fact 10.7 m according to the survey plan. The Dam Works Assessment Decision Framework reads: the maximum height means the height from the crest of the dam to the lowest point of natural ground level.
- This application would need to include a Preconstruction Investigation and Design Report which is missing.
- A dam fail scenario would have a large impact on the high value of the delicate ecosystem, the Templestowe Lagoon. These facts are downplayed and not adequately addressed in the application.
- The Consequence Category Sheet is incorrect in the above-mentioned errors and in 'B4 Environmental Impacts' Stock and Fauna, Ecosystems and Rare and endangered species should read NO.
- The Sediment and Erosion Control included is not to the detail required by the Guidelines for Developing a Sediment and Erosion Control Plan for Dam Works Sites. This plan is of importance to protect adverse impacts on the estuary, the wetlands and Doctors Creek.

- Coastal Zone - Framework Item 5.6 - The Coastal Zone is defined in the Water Management (Division 3 Declared Works) Order 2015 as all State waters, within the meaning of the Living Marine Resources Management Act 1995; and all land to a distance of one kilometre inland from the high-water mark. The Dam is clearly within 1km inland and therefore within the Coastal Zone.
- The information below is missing in the application.

“A Coastal Zone Impact Assessment” which addresses the below:

- (a) siting, design, construction and maintenance of dam works will be sensitive to the natural and aesthetic qualities of the coastal environment.
- (b) dam works design responds to the particular size, shape, contours or slope of the land.
- (c) the proposal includes strategies to avoid or mitigate potential adverse environmental effects.
- (d) impacts to coastal processes, including sand movement and wave action, will be minimised and any potential impacts are mitigated so that there are no significant long-term impacts.
- (e) the need for a coastal location of the dam is demonstrated.
- (f) works will be undertaken generally in accordance with the Tasmanian Coastal Works Manual.

I think it is wrong that the onus should be on the community having to highlight all the above errors in the published application.

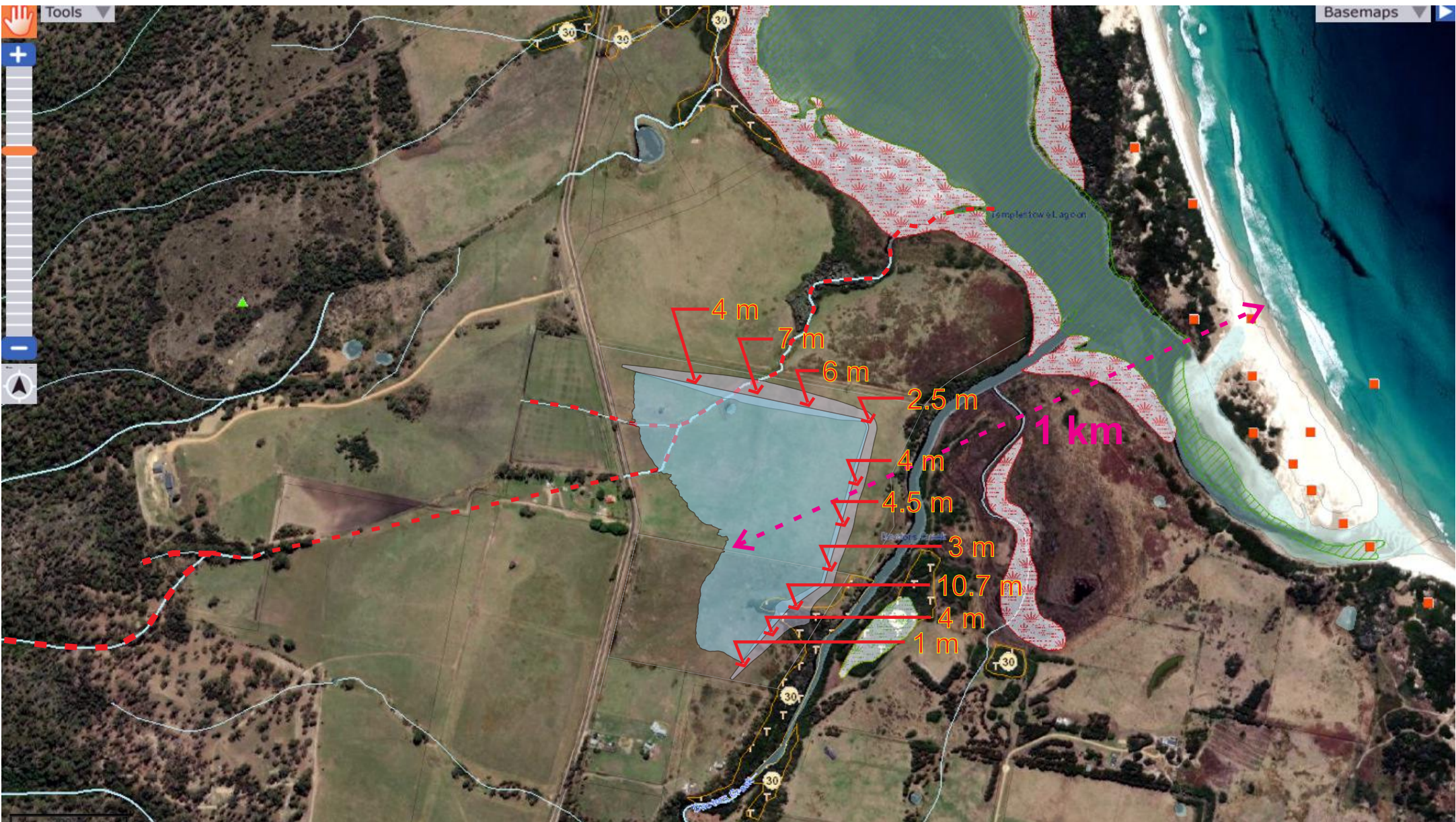
For the above reasons we object to the granting of a works permit for the advertised dam proposal.

Yours sincerely

Daniel Steiner
Treasurer

Seymour Community Action Group Inc. - <https://scagi7215.wixsite.com/scagi>

Attachment: Appendix A



200m
Scale

--- Un-named Creek tributary to Templestowe Lagoon

Coastal Zone / Dam wall heights from crest to lowest natural ground level