

### **SUBMISSION ON THE DRAFT STATE ENVIRONMENTAL PLANNING POLICY (SEPP) (COASTAL MANAGEMENT) 2016**

The NSW Government is seeking feedback on its proposed new State Environment Planning Policy for Coastal Management, which will form an essential element of the coastal reforms policy framework being introduced across the State.

This report provides a response from the staff of Byron Shire Council on the new legislation.

**Report Author:** Chloe Dowsett (Coastal and Estuary Officer) and Sandy Pimm (Ecologist)  
**Review and comments:** Alex Caras (Acting Manager Environment and Economic Planning), Clyde Treadwell (Planner), Greg Smith (Team Leader Planning Services)  
**Final review:** Shannon Burt (Director of Sustainable Environment and Economy)

### **Background**

NSW Coastal Reforms are well underway with the Department of Planning and Environment, together with the Office of Environment and Heritage developing a new coastal management framework. The framework aims to tackle existing and emerging coastal challenges and opportunities, to ensure thriving and resilient coastal communities now and into the future.

### **Coastal Reforms Framework**

The new policy framework on coastal management being introduced by the State Government consists of three main components.

1. The new **Coastal Management Act 2016** (The Act) provides a strategic vision for managing the future of coastal communities, including setting the objectives for the four different mapped coastal management areas (coastal vulnerability, coastal use, coastal environment and coastal wetlands and littoral rainforests area).
2. Each management area has its own set of management objectives, which are to be given effect through implementation of a new **State Environmental Planning Policy (SEPP) for Coastal Management 2016**. The new Coastal Management SEPP identifies the land areas making up the four coastal management areas through maps, and specifies the development controls applying to those areas. Once published the Coastal Management SEPP will be the single land use planning policy for coastal development incorporating and modernising provisions from SEPP 14 (Coastal Wetlands), SEPP 26 (Littoral Rainforests) and SEPP 71 (Coastal Protection).
3. A **Coastal Management Manual** will provide guidance to councils for preparing Coastal management Programs (CMPs) and on applying the development controls listed in the Coastal Management SEPP. The Act will require all coastal councils to develop CMPs in consultation with their communities to set the long term strategy for

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coordinating management of coastal land. These CMPs will over time replace the current Coastal Zone Management Plans (CZMPs) by 2021.

Council provided a submission on proposals for the above components of the reforms when they were placed on public exhibition earlier this year. At that time the draft SEPP on display for comment was 'An Explanation of Intended Effect for the proposed new Coastal Management SEPP' as the maps of the four areas were not finalised. The Act has since passed both houses of parliament and will be enacted when the Coastal Management SEPP and the Coastal Management Manual are finalised.

Consultation is currently being sought on the draft Coastal Management SEPP and draft maps of the four new coastal management areas that make up the coastal zone. Once published the SEPP will be the single land use planning policy for coastal development and will repeal SEPP 14, SEPP 26 and SEPP 71.

The Minister for Planning released the draft Coastal Management SEPP on Friday 11 November, together with associated maps. Also being exhibited is a draft section 117 Ministerial direction and a draft Standard Instrument (Local Environmental Plans) Amendment (Coastal Management) Order. The public consultation period for the draft SEPP and associated maps is from **11 November 2016 to 20 January 2017** (recently extended from 23 December 2016).

### **Draft Coastal Management SEPP and Mapping**

The draft Coastal Management SEPP and associated mapping will be the primary environmental planning instrument that will set the land use planning framework for coastal management in NSW. It aims to ensure the planning objectives of The Act are implemented. The draft Coastal Management SEPP specifies the development controls that will apply to particular forms of development or within particular coastal management areas, as defined by the 4 maps. It also defines the consent process and requirements for public authorities and private landowners who propose to construct coastal protection works.

Outlined in the table below are the final comments from staff of Byron Shire Council on the Draft Coastal Management SEPP and associated mapping.

### Review Comments:

N°	Page Part / Clause	Comments and Suggested Changes
1.	Page 3 Part 1, Clause 6 (2)	<p>The area covered by the Departments littoral rainforest mapping is only a fraction of Byron Shire Council's mapped littoral rainforest under our 2015 vegetation mapping review. This is particularly the case for Broken Head, but also includes important areas at Belongil and Byron foreshores, Suffolk Park, Brunswick and Ocean Shores. Given the changes to the Biodiversity Conservation Bill, significant areas of littoral rainforest not mapped would appear to be able to be assessed for clearing with little protection. The most significant of these is the area around Broken Head, adjacent Broken Head Nature Reserve, and representing remnant native vegetation.</p> <p>Conversely, concerns are raised about the additional extent of coastal wetlands mapping as it impacts Council land.</p> <p>At Tyagarah Airfield the mapping extends across the end of the existing runway which is required to be kept clear of tree hazards. The extent of mapping could require an EIS for any application of tree pruning or removal required for ongoing safety management.</p> <p>Where each of these communities has been mapped to Plant Community Types (PCTs) we are confident in the Council mapping.</p> <p>Similarly coastal wetland mapping should be compared to our current PCTs such as Tweed Shire Council have done, otherwise the accuracy or otherwise can't be ascertained.</p> <p>Council has previously expressed concern about the mapping needing to be reviewed in our comments on the Explanation of Intended Effect Coastal Management SEPP.</p> <p><b>Suggested changes:</b></p> <ul style="list-style-type: none"><li>• Council requests that the Coastal Wetlands and Littoral Rainforests Area Map be updated and include recent mapping undertaken by Council. Appendix 1 of this submission describes the process and Plant Community Types recommended to refine and provide accurate data to represent Littoral Rainforest and Coastal Wetlands in Byron Shire. Shape files have been collated and will be sent separately if necessary.</li></ul>

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N°	Page Part / Clause	Comments and Suggested Changes
2.	Page 5 Part 1, Clause 6 (2), (4)	<p>Littoral rainforests, coastal wetlands and coastal lakes/sensitive coastal lakes are defined only by being mapped or listed in Schedule 1 or Schedule 2.</p> <p>In the absence of definitions, it is difficult for Council to request alterations to mapping or listings even where they think it is warranted.</p> <p><b>Suggested changes:</b></p> <ul style="list-style-type: none"> <li>• That wetland and littoral rainforest areas are defined and referred to by a relevant list of OEH's Plant Community Types to ensure clarity and accurate mapping. As an example, some Coastal Heath Swamps such as those found at West Byron STP site are now mapped as Coastal Wetlands, but were not previously mapped in SEPP 14 as they are very rarely subject to inundation.</li> </ul>
3.	Page 5 Part 1, Clause 6 (3)	<p>The coastal vulnerability area is not defined by any key parameters other than by either the:</p> <ul style="list-style-type: none"> <li>• Coastal Vulnerability Area Map,</li> <li>• Land identified as "coastal hazard land" on the Local Government Coastal Hazard Map.</li> </ul> <p>The area is undefined in terms of planning timeframes, sea level rise benchmarks etc.</p> <p>The Coastal Vulnerability Area Map is yet to include any land at present, and will require a long timeframe to identify areas based on local coastal modelling and technical studies. The present map referred to in the Draft SEPP Coastal Management 2016 for coastal hazard lands for Council is based on the mapping in LEP (1988), which broadly follows the DCP (2010) - Part J coastal planning precincts area. The mapping is not based on current coastal hazard mapping as there is no such zone in the current LEP (2014) that covers 'coastal lands'. All coastal lands subject to coastal hazards are considered a 'deferred matter' in the current LEP (2014) and thereby revert back to the previous LEP (1988) and accompanying DCP (2010). The Part J coastal planning precinct area of the DCP (2010) is based on a study of coastal process completed in 1978 and the mapping of coastal hazards is completely out-dated. The mapping includes beach erosion and shoreline recession, but does not include consideration of sea level rise, which is a requirement of State coastal zone management plans (CZMPs) as per the Guidelines (OEH, 2013). Beach erosion, shoreline recession and sea level rise have been considered and incorporated into the recent technical study completed by BMT WBM in 2013 which has produced hazard lines for the immediate, 2050 and 2100 timeframes. Council has made request to have a new zone added to the</p>

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		<p>current LEP (2014) based on the most recent hazard mapping undertaken by BMT WBM in 2013. However, no resolution/response has been received by the Minister. Implications for Council regarding the Draft SEPP Coastal Vulnerability Area Map is that the area is based on out-dated mapping (influenced by a higher recession phase and stormy erosion loss period), and more contemporary data and analyses (based on a lower recession rate) is available.</p> <p>This will mean that two legally binding planning documents will revert to out-dated hazard mapping, for which Council has more technically robust information available.</p> <p><b>Suggested changes:</b></p> <ul style="list-style-type: none"> <li>• That the Minister approve the inclusion of a new coastal hazard zone (such as 'E5 Coastal Hazard' and/or 'E6 Coastal Living'), either as an amendment to the Standard Instrument LEP or to Byron LEP 2014, based on the most recent coastal hazard mapping undertaken by Council.</li> <li>• That recent technical studies/modelling/mapping completed by Councils but not yet incorporated into the Coastal Vulnerability Hazard Map, be considered in the granting of development within the coastal zone.</li> <li>• There needs to be a clear process for the updating of maps when more accurate information/studies are completed. A logical pathway may be that mapping from a certified CZMP/CMP automatically updates the SEPP mapping, e.g. upon gazettal of the CZMP/CMP.</li> <li>• Technical studies that have already been prepared under the previous framework should be still considered relevant and appropriate.</li> </ul>
4.	Page 5 Part 1, Clause 6 (5)	<p>The Coastal Use Area Map should not apply over gazetted National Parks and Nature Reserves. Although these areas have E1 zonings and thus under the LEP only allow uses permitted under the National Parks and Wildlife Act 1974, the Draft SEPP (Coastal Management) 2016 mapping over much of Tyagarah Nature Reserve for example, allows a perception that these areas are open for development. To remove the National Parks and National Reserve areas from the Coastal Use Area Maps would provide clarity at the SEPP level.</p> <p><b>Suggested changes:</b></p>

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N°	Page Part / Clause	Comments and Suggested Changes
		<ul style="list-style-type: none"> <li>Remove National Parks and National Reserve areas from the Coastal Use Area Map.</li> </ul>
5.	Page 7 Part 2 Division 1 Clause 11	Council does not support development on littoral rainforests, coastal wetlands or other sensitive areas, however, if such development is permitted on these areas, we support its classification as designated development with an EIS required.
6.	Page 8 Part 2 Division 1 Clause 12 (2)	<p>Development on land in proximity to coastal wetlands or littoral rainforest zoned as R1, R2, R3, R4, R5 or RU5 under an environmental planning instrument does not require consideration of the impacts of the development in relation to its 'proximity' to these sensitive coastal environments. This residential zoned area has been clipped from the 100m proximity area mapping to exclude it.</p> <p>Residential development in proximity to coastal wetlands and littoral rainforest is the greatest threat to these environmental assets in Byron Shire as it represents the highest amount of development occurring, and because much of it can be undertaken as complying development. It is unfair to place the burden for proximity controls over public and commercial interests, while excluding residential zones. Many of the residential zoned areas are yet to be developed and it would be of great assistance to have updated controls relevant to new subdivisions. An example is shown below where new subdivision in Ocean Shores, in close proximity to coastal wetlands and Marine Park, has no ecological/hydrological controls applied under the SEPP and yet any new development at an existing shopping centre adjoining the site must be assessed using the 'proximity' controls (see Figure 1). New housing areas, with completely reworked storm water systems and a great ability to alter the existing hydrology of coastal wetlands, are omitted. This may be acceptable if the 'coastal use area' category, which does apply to residential land, included a requirement to consider hydrological and ecological impacts, but it does not.</p> <p>It is concerning that residential sites adjacent to littoral rainforests and wetlands (that were most probably once within the 100m proximity area but are now clipped out) are not required to consider the Coastal SEPP provisions. Residential developments have the potential to significantly impact on sensitive sites within the same catchment in close proximity, through water quality and degradation</p>

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		<p>and loss of habitat. Any future changes to development codes such as the General Housing Code may potentially mean that numerous dwellings could be constructed in the perimeter of a littoral rainforest or wetlands without the need to obtain development consent. Under this clause, these sensitive areas may not be offered sufficient protection.</p> <p><b>Suggested changes:</b></p> <ul style="list-style-type: none"> <li>Land zoned as residential should not be exempt from planning controls under Clause 12 and 100m proximity areas should be mapped over land of any zoning.</li> <li>Addition of a development control for “coastal use area” to ensure proposed development is not likely to cause adverse impacts on the biophysical, hydrological (surface and groundwater) and ecological environment.</li> </ul> <p><b>Suggested changes:</b></p> <ul style="list-style-type: none"> <li>In the interest of management objective (1) of the <i>Coastal Management Act 2016</i> for coastal wetlands and littoral rainforests area land zoned residential should be required to obtain development consent to erect a building, to undertake earthworks or to destroy or remove native vegetation within the 100m perimeter of a littoral rainforest or wetland.</li> </ul>
7.	Page 8 Part 2 Division 2 Clause 13 (3)	<p>A consent authority granting development on land within the coastal vulnerability area needs only to “consider” whether the buildings or works should be temporary, and whether the use of the land should be temporary. “Consideration” is not a strong enough planning control and development within the vulnerability area should be controlled by specified provisions. Removal of buildings at the end of a specified period (expiration period) is supported; however, buildings also need to be removed if hazards come within certain distances of buildings (trigger distances). A consent authority (Council) needs to be able to specify the removal/relocation requirements (costs incurred by landowner) if a coastal hazard such as erosion comes within a certain distance of a property. Buildings within the immediate hazard zone should also only be granted approval under certain conditions such as construction material, etc.</p> <p><b>Suggested changes:</b></p> <ul style="list-style-type: none"> <li>Include an additional subclause (3)(c) specifying that a consent authority should also consider whether any proposed buildings or works should be re-locatable/removable within specified distances to hazards.</li> </ul>

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N°	Page Part / Clause	Comments and Suggested Changes
		<ul style="list-style-type: none"> <li>Amend wording to specify that a consent authority must not grant approval of development within the coastal vulnerability area unless any development planning controls in relevant Development Control Plans have been implemented.</li> </ul>
8.	Page 9 Part 2 Division 4	<p>The development controls for granting development on land within the coastal use area are specifically related to foreshores, headlands, Aboriginal heritage, surf zone and coastal shorelines. However, the coastal use zone extends to 1km inland from the mean high water mark which includes areas away from the foreshore/beach. There is a lot of land included in this zone, and development that is not in the immediate vicinity of the coast could indirectly affect other areas such as waterways, terrestrial vegetation and estuaries, through storm water, irrigation etc. To ensure adequate protection of the ecological and hydrological environment within the coastal use zone (for areas not within the coastal environment or wetland/littoral rainforest area), a further development control should be added.</p> <p><b>Suggested changes:</b></p> <ul style="list-style-type: none"> <li>Addition of a development control regarding proposed developments not likely to cause adverse impacts on the biophysical, hydrological (surface and groundwater) and ecological environment.</li> </ul>
9.	Page 9 Part 2 Division 5 No specific Clause	<p>In relation to general development in the coastal zone, presently there are no provisions or planning controls for exempt and complying development, and this development may take place in areas in the vicinity of sensitive coastal environments. There needs to be some more 'weight' added to the Draft SEPP Coastal Management 2016 to protect sensitive areas within the coastal zone.</p> <p><b>Suggested changes:</b></p> <ol style="list-style-type: none"> <li>Development consent must not be granted to exempt and complying development within the coastal zone if that development is likely to compromise:           <ul style="list-style-type: none"> <li>The biophysical, hydrological and ecological integrity of a littoral rainforest, coastal wetland or sensitive coastal environment; or</li> <li>The quantity and quality of surface and ground water flows to a littoral rainforest, coastal wetland or sensitive coastal environment if the development is on land within the catchment of a littoral rainforest, coastal wetland or sensitive coastal environment.</li> </ul> </li> </ol>



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N°	Page Part / Clause	Comments and Suggested Changes
		2. All development within the 100m perimeter area of a littoral rainforest, coastal wetland or sensitive coastal environment must be classified as designated development.
10.	Page 10 Part 2 Division 5 Clause 19	A single parcel of land may be identified as being within more than one parcel of land, and if the development controls of the management areas applying to the land are inconsistent, then the controls of the highest prevail. Given this hierarchy in terms of management objectives if overlapping, it will be critical that mapping for both the coastal wetlands and littoral rainforests area, and the coastal vulnerability area is accurate, based on contemporary best-science and ground truthed.
11.	Page 11 Part 3 Clause 21	<p>The word 'relevant' is used in Clause 21 and 22 in relation to coastal management programs (CMPs) and coastal zone management plans (CZMPs) in a context that readers may interpret very differently. CMPs or CZMPs either should be 'certified' or 'adopted' if coastal protection works identified in the plans are allowed to be carried out by or on behalf of a public authority. The word 'relevant' could mean many things, as such Byron Shire Council has a draft CZMP presently being assessed by the Minister, but not yet certified (or adopted). This draft CZMP is 'relevant' to Council and as such we could choose to carry out coastal protection works identified in this plan without development consent in the absence of a certified and adopted CZMP. The wording needs to be clearer around this clause to avoid any misinterpretation.</p> <p><b>Suggested changes:</b></p> <ul style="list-style-type: none"> <li>Remove the word 'relevant' and replace with 'certified' or 'adopted' depending on whether the CMP/CZMP just needs to be certified or actually gazetted for works to be carried out by a public authority without consent.</li> </ul>
12.	Page 14 Schedule 1	<p>Addition of Taylors Lake to Schedule 1 as per comment 2.</p> <p>Byron Shire Council welcomes the addition of Ti Tree (Taylors) Lake to Schedule 1 following our previous comments on the importance of this lake to the Aboriginal people of Byron Bay and the high environmental/ cultural values of the area. However, Council would like confirmation that this 'Ti Tree Lake' is indeed Ti Tree Lake (Taylors Lake) south of Broken Head in Byron Shire and not another lake in NSW. There may be other lakes elsewhere in NSW with similar common name.</p>

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N°	Page Part / Clause	Comments and Suggested Changes
		<p><b>Suggested changes:</b></p> <ul style="list-style-type: none"> <li>• Addition of local government area/region to Schedule 1 and 2 to correctly identify each lake.</li> </ul>
13.	Part 2 Development controls for coastal management areas	<p>The draft CM SEPP deals with the application of provisions regarding “management areas” and parcels of land - and the parcel could be subject to more than one management area.</p> <p>Development controls for each management area apply to land ‘wholly or partly’ within that relevant management area.</p> <p>If this is applied to a property, it could have a very small proportion that is identified as being within the Coastal Wetland or Littoral Rainforest area, and another portion of that land could be in one of the other management areas. There is no requirement for development consent under the draft CM SEPP for “works/development” in areas other than in the Coastal Wetland or Littoral Rainforest area. However, in those areas, development consent is required for works/development and those works/development become designated development. Thus the relevant determination process for designated development would apply.</p> <p>If a proposal involves works in another area of the property, and even if in this area the works/development will have no impact on the Coastal Wetland or Littoral Rainforest area what-so-ever, development consent will still be required, and an EIS will still need to be prepared for those works/development.</p> <p>An adjoining property could have none of its parcel within the Coastal Wetland or Littoral Rainforest area, and hence avoid the requirement for development consent and an EIS for similar works in a similar location – bringing about community concern/feedback about consistency and transparency in the application of requirements.</p> <p><b>Suggested changes:</b></p> <ul style="list-style-type: none"> <li>• Simplification and clarification for development within land classified by more than one management area.</li> <li>• Additional clarification in Part 2 - Division 1 – 11 (1) to only apply the requirement for works to be deemed as designated development where the works directly impact on the Coastal Wetland or Littoral Rainforest area, rather than wholly or in part of the land.</li> </ul>

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N°	Page Part / Clause	Comments and Suggested Changes
14.	End	



**Figure 1:** Coastal wetland 'proximity area' mapped over Ocean Shores shopping village in the north of the photo, but not over the new residential subdivision in the south.

### **Appendix 1**

#### **BYRON SHIRE COUNCIL COASTAL WETLAND AND LITTORAL RAINFOREST MAPPING REVIEW JANUARY 2017**

#### ***Mapping Criteria and Notes***

#### **Littoral Rainforest**

No definition of Littoral Rainforest is available in the Coastal SEPP, apart from reference to the mapped areas, therefore all PCT's identified at Keith Class level as Littoral Rainforest have been included here so long as certainty existed as to the mapped PCT. Byron Vegetation mapping was undertaken by Landmark Ecological Services (Annette McKinley, Barbara Stewart and Andrew Benwell) using 2013 *NearMaps* aerial photography. Where vegetation was identified to PCT type, air photo interpretation and ground-truthing was sufficient to enable confidence in the identification of vegetation community type. Where doubt occurred, vegetation was mapped to Keith Class level only and has not been included here.

The following *Byron Vegetation Mapping 2015* – Plant Community Type (PCT) Codes\* were identified as Littoral Rainforest vegetation types for the purposes of this exercise.

\*see attached Byron communities list, based on revised Northern Rivers CMA PCT types, accepted by OEH

<b>Byron PCT Code</b>	<b>Description</b>
2036	Bennett's Ash-Three-veined Laurel-Blue Lilly Pilly littoral rainforest
2038	Coast Banksia - Tuckeroo closed forest/shrubland of coastal Holocene dunes
2039	Tuckeroo - Bird's Eye Alectryon - Beach Acronychia littoral rainforests
2040	Tuckeroo - Cottonwood - Hoop Pine littoral rainforest of tidal channel bank alluvium
2041	Brushbox headland littoral rainforest
2043	Cottonwood closed forest or shrubland of seaside bedrock hillslopes
9007	Coast Banksia-rainforest on metasediments
9	Brushbox littoral rainforest on sands

### Coastal Wetlands

1. The Coastal SEPP does not provide any definition for Coastal Wetlands, apart from the 'mapped areas'.
2. Reference was therefore given to 'Section 6 - Criteria' of the *Draft Guidelines to assist council staff in interpreting SEPP 14 Wetland boundaries over short distances dated September 2004 prepared by Department of Infrastructure, Planning and Natural Resources* to assist in assigning wetland classification to vegetation types (attached).
3. Based on the above criteria and on Keith Formation as either Forested Wetlands; Freshwater Wetlands or Saline Wetlands, the following *Byron Vegetation Mapping 2015 – Plant Community Type Codes\** were identified as wetland vegetation types for the purposes of this exercise:

\*see attached Byron communities list, based on revised Northern Rivers CMA PCT types, accepted by OEH

Byron PCT Code	Description
1011	Red-fruit Saw-sedge-Coral Fern Sedgeland of North Coast Wallum Duneslopes and Open Depressions
1012	Slender Twine-rush - Pale Cord-rush Sedgeland
1917	Swamp Oak forested wetland of saline areas of coastal estuaries
1918	Swamp Oak - Sea Rush swamp forest on saline coastal swamps and flats
1920	Swamp Oak - Broad-leaved Paperbark - Willow Bottlebrush floodplain forested wetland
1921	Swamp Oak - Milky Mangrove - Broad-leaved Paperbark king tide forest and woodland
1924	Broad-leaved Paperbark-Swamp Oak-Tall Sedge swamp forest on alluvial soils
1925	Broad-leaved Paperbark - Bare Twig Rush swamp sclerophyll open forest of coastal swamps
1928	Broad-leaved Paperbark swamp sclerophyll forest with rainforest elements on coastal floodplains
1933	Broad-leaved Paperbark-Brush Box-Swamp Box swamp sclerophyll forest on clays of coastal plains
1934	Broad-leaved Paperbark-Swamp Mahogany-Swamp Box swamp sclerophyll forest on coastal sandsheets
1937	Swamp Mahogany-tea-tree-Tassell Rush forested wetland of waterlogged wallum soils
1938	Swamp Box-Forest Red Gum-Pink Bloodwood seasonal swamp forest
1941	Swamp Box-Red Mahogany-Paperbark transitional swamp forest on floodplain edges
1942	Swamp Mahogany-Tantoon-Tassell Rush forested wetland of waterlogged sandy soils
1944	Forest Red Gum-Willow Bottlebrush-Broad-leaved Paperbark tall open forest on alluvial floodplains
1951	Lagoon forland of permanent wetlands on the coastal floodplains
1953	Common Reed grassland on alluvial floodplains

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Byron PCT Code	Description
1961	Giant Sedge sedgeland of frequently inundated areas of sandy alluvium
1963	Red-fruited Saw-sedge - Olive Tea-tree fernland / sedgeland
1967	Tea-tree tall shrubland of coastal freshwater sand swamps
1980	Derived sedgelands or saline grasslands of disturbed sites on estuarine plains
2185	Forest Red Gum- tall to very tall moist open forest/rainforest transition on the coastal plain
2218	Prickly Couch - Sea Rush - Common Couch saltmarsh of saline coastal swamps and flats
2219	Sea Rush saltmarsh of saline coastal swamps and flats
2222	Saltwater Couch - Samphire saltmarsh of low-lying estuarine areas
2225	Grey Mangrove - River Mangrove low open or closed forest or shrubland of intertidal flats
9001	Broad-leaved Paperbark-Willow Bottlebrush on alluvial floodplains
9002 -	Forest Red Gum-Tallowwood-Flooded Gum-Swamp Mahogany-Pink Bloodwood+/- Brush Box on floodplain
9005	Swamp Oak with rainforest elements on coastal floodplains and metasediments
9006	Tall Saw Sedge sedgeland

**\*\*Please note that this mapping does not cover National Parks or Nature Reserves. The layers submitted should be combined with DPE existing mapping for National Parks and Nature Reserves.**