



NSW Department of Planning and Environment  
GPO Box 39  
Sydney NSW 2001  
NSW Office of Environment and Heritage  
Sydney NSW 1232

19th January 2017

**RE: Coastal Management State Environmental Planning Policy (SEPP)**

For the attention of the Department of Planning and Environment NSW,

The NSW branch of the Australian Marine Sciences Association (AMSA) appreciates the opportunity to comment on the Coastal Management State Environmental Planning Policy.

AMSA is a professional society of over 1000 members nationwide and over 200 in NSW, committed to understanding and advancing marine sciences in Australia. Our members are practicing marine scientists from universities and government agencies and have expertise spanning all disciplines related to marine science, with many having a particular focus on coastal or marine biodiversity and fisheries.

Please note the following points in relation to the proposed framework for coastal management plans:

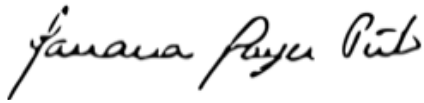
1. AMSA NSW supports a more holistic approach to mapping areas of interest, based on landforms, vegetation, key habitat-forming organisms and topography. Many sites have not been covered in totality in the maps drafted (for example the Tomago Wetlands in the Hunter River estuary or Everlasting Swamp on the Clarence) or have exclusions based on property boundaries. We suggest using broad acre 'wetness indicators' such as the CoastAdapt Shoreline Explorer (<http://coastadapt.com.au/coastadapt-interactive-map>), which may provide a useful tool to improve the Coastal Wetland SEPP maps.
2. The development controls for the mapped coastal use area are focused on 'ensuring appropriate urban development for coastal areas, taking into account urban design issues and maintaining scenic qualities, visual amenity and aboriginal cultural heritage and places'. We recommend that this be expanded to encompass other key values including the protection and restoration of biodiversity

and the protection and enhancement of the ecosystem services that these urban systems provide. Developments done in these coastal areas should therefore be carefully planned and designed to not disrupt important land-sea connections and ensuring a multi-functional endpoint, e.g. protection of key habitat-forming organisms, ecosystem functioning, increased resilience (Dafforn et al. 2015, Mayer-Pinto et al. 2017).

3. Further, in order to “improve the resilience of coastal wetlands and littoral rainforests...” it is also important to acknowledge the influence that many terrestrial systems have on these wetlands. This again would require that management plans take into account the importance of land-sea connectivity (e.g. movement of organisms and resources) and any possible impacts that future development and predicted climatic changes will have on ecological connectivity of these systems. Possible sources of pollution should also be considered in the policy.
4. The policy makes no reference to Ecologically Sustainable Development (ESD) nor to sustainability in a general sense. Given the explicit role of ESD in the protection of biodiversity, as laid out in the Federal EPBC Act, and the acknowledged vulnerability of coastal areas, we believe a number of ESD principles should be incorporated into the Planning Policy. In particular these include the principles of sustainable use, the precautionary principle and conservation of biological diversity.
5. The policy makes no reference to climate change, nor in particular to sea level rise. We believe the magnitude of the threat that these pose to the future of our coastal areas warrants explicit acknowledgement of these risks, and the management of them, in the policy.
6. Two of the five stated objectives of the Coastal Wetlands SEPP are focused on rehabilitation and restoration (or improved resilience). This includes “to promote the rehabilitation and restoration of degraded coastal wetlands and littoral rainforests” and “to improve the resilience of coastal wetlands and littoral rainforests to the impacts of climate change, including opportunities for migration”. At present the SEPP maps provide limited ability to meet these objectives. To improve the maps it may be warranted to identify degraded sites (which were historically wetlands/rainforests) and ensure that they are included in a way that promotes rehabilitation and restoration. Further, mapping of climate change impacts would assist in protecting these areas and ensuring that migratory sites are noted/protected for the future. An example of this includes the wetlands fringing Tomago Wetlands on the Hunter River estuary.
7. In the proposed framework, the Coastal Environment Area is defined as extending 1 km beyond the Highest Astronomical Tide. However, in many cases throughout NSW this is not mapped correctly. One example to note is the Hunter River where the Coastal Environment Area stops at Maitland, well below the tidal influence limit. Another example is on Cattai Creek on the Manning River estuary. In other locations the Coastal Environment Area is mapped in regions that were once part of the tidal estuary but are now floodgated (a nearby example includes Wallis/Fisheries Creek south of Maitland). While it is useful and prudent to include historic channels, a consistent approach is warranted.

AMSA believes that the above points should be taken in consideration when revising the Coastal Management SEPP.

Kind regards, on behalf of AMSA NSW,



**Dr Mariana Mayer-Pinto**  
Councilor, NSW AMSA



**Dr Adriana Vergés**  
President NSW AMSA

**References Cited:**

Dafforn KA, Glasby TM, Airolidi L, Rivero NK, Mayer-Pinto M, Johnston EL (2015) Marine urban sprawl: how can ecology inform the design of multifunctional artificial structures? *Frontiers in Ecology and the Environment* 13:82-90

Mayer-Pinto M, Johnston EL, Bugnot AB, Glasby TM, Airolidi L, Mitchel A, Dafforn KA (2017) Building 'blue': An eco-engineering framework for foreshore developments. *Journal of Environmental Management* 189:109-114