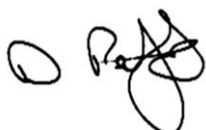


Director, Environment and Building Policy,
GPO Box 39,
Sydney NSW 2001

Re: The Coastal Management State Environmental Planning Policy (SEPP)

Please find attached a submission on the draft Coastal Management State Environmental Planning Policy (SEPP). This submission has been prepared by the Scientific Advisory Committee of the Sydney Institute of Marine Science (SIMS). SIMS is a major marine science research institute founded by four universities in the Sydney region (Macquarie University, the University of New South Wales, the University of Sydney, and the University of Technology Sydney). SIMS conducts multidisciplinary marine research across five core research themes – urbanisation, biodiversity, climate change, ocean resources, and marine management. SIMS is also the operator of the NSW node of the Australian Government's Integrated Marine Observing System – IMOS and the Coastal Processes and Responses Node of the NSW Adaptation Hub established by the NSW Office of Environment and Heritage (OEH). The work of the institute is conducted by marine scientists from all four of the founding universities and partner organizations including the NSW OEH, the Australian Museum and the NSW Department of Primary Industries. This provides SIMS with an extremely broad scope of professional expertise that is particularly pertinent to the Coastal Management SEPP. The following submission was prepared by SIMS scientists who are internationally recognized experts in this area and have particular expertise in coastal management in NSW. Our submission focuses on areas for which we have a particularly high level of scientific expertise and knowledge.

Yours sincerely,



A handwritten signature in black ink, appearing to read 'D. Raftos', is located below the 'Yours sincerely,' text.

Sydney Institute of Marine Science submission on the draft Coastal Management State Environmental Planning Policy (SEPP), 2016

This submission focuses on four aspects of the draft Coastal Management SEPP (primarily with regard to mapping within the SEPP), as follows:

1. **Exclusions:** The maps in the draft SEPP are a significant improvement over the existing SEPPs (especially SEPP 14 around the Sydney basin). However, there are obvious exclusions that should be addressed. Many sites are either not covered in totality (see Tomago Wetlands in the Hunter River estuary or Everlasting Swamp on the Clarence) or have exclusions based on property boundaries. A more holistic approach to mapping the areas of interest should be considered based on landforms, vegetation and topography. Broad acre “wetness indicators” such as the CoastAdapt Shoreline Explorer (<http://coastadapt.com.au/coastadapt-interactive-map>) may provide a useful tool to improve the Coastal Wetland SEPP maps.
2. **Extent of Coastal Environment Area:** The Coastal Environment Area is defined as extending 1 km beyond the Highest Astronomical Tide. In many cases throughout NSW this is not mapped correctly in the draft SEPP. One example of 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 more consistent approach is warranted.
3. **Degraded Wetlands:** 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 maps in the draft SEPP have only a limited capacity to meet these objectives. To improve the maps, it would be necessary to identify degraded sites that 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 and/or protected for the future. An example of this includes the wetlands fringing Tomago Wetlands on the Hunter River estuary.
4. **Consistency in Planning:** It appears that draft SEPP applies different zonings in regions where two Councils bound an estuary. For instance, different methods for calculating the Coastal Use Area appear to have been used on the northern and southern sides of the Hawkesbury River. This application of different zoning criteria in different areas would invariably lead to confusion and inconsistencies in planning.