



STEP Inc

Community-based Environmental Conservation since 1978

20 January 2016

Director Environment and Building Policy
NSW Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Sir

Re State Environmental Planning Policy (Coastal Management) 2016

STEP Inc is a local community-based environmental group, with a membership of over 400 in the Hornsby/Ku-ring-gai area. Our group has considerable experience in environmental issues and regenerating and preserving natural bushland and native vegetation.

In general this document is a sound basis for ecological sustainable development and for the long term conservation of important ecosystems and public use of coastal areas. STEP however has a few comments to aid better management of these areas.

1. Coastal Wetlands

The first issue is the mapping of the proximity area for coastal wetlands. STEP believes that the coastal wetlands should be given similar protection to coastal lagoons with a 500m proximity zone and a provision for additional catchment area protection. It is the incoming and adjoining creeks that carry the damaging sediment, nutrients and weed propagules, i.e. management needs to start well up the catchment.

The buffer area should also be applied to land zoned for residential use, that is land zoned as R1, R2, R3, R4, R5 or RU5. This is important given that the complying development provisions may apply to these land areas.

2. Coastal Use Area Mapping along the Hawkesbury River

While STEP can understand the change from 1 km landward in rural areas, to 200 m landward of the open coast and 100 m landward of the estuaries, bays and other waterways in Sydney, this has led to an anomalous situation along the Hawkesbury River. On the Hornsby Council side the coastal use area width is only 100m while on the Central Coast side it is 1 km, even though current land management is similar on both sides of the River. This ridiculous situation continues all the way to Wisemans Ferry. Ideally the coastal use area should be mapped as 1 km on both banks of the Hawkesbury River so that this major recreational and tourism area is given adequate scenic and environmental protection.

STEP would also like the Coastal Use Zone widened along the Hawkesbury River from 100m to at least 500m but preferably to 1 km up to Yarramundi. The length of the

Hawkesbury River from Wisemans Ferry to Yarramundi is primarily bushland or rural and is a major recreational destination for the people of Sydney; including water skiing, canoeing and boating in general. This river length is also part of the scenery at the foot of the Blue Mountains, so valued by both local and international tourists. Surely this coastal use area deserves at least a width of at least 500 m from the River for maintenance of:

- Appropriate type , bulk, size and scale of development
- Adequate open space and associated public infrastructure
- Protection from adverse impacts of development on cultural and built environment heritage

As Western Sydney grows the recreational, scenic and natural values along the Hawkesbury River will be invaluable.

3. Coastal Maps

In general the maps seem to have been prepared without adequate consideration of variations in coastal geography. For example, coastal environment areas that are 100m landward from beaches do not necessarily cover the full beach and dune system. The catchment of coastal lakes that are not defined as sensitive is effectively defined as 500m landward. This makes no allowance for the topography of the catchment. The maps need to be checked on the ground rather simply defined from aerial viewing.

4. Coastal Hazard Land

We note that the mapping of coastal vulnerability areas has not been completed. We wish to emphasise the importance of including allowance for the increased risks associated with climate change of sea level rise, storm surge and flooding on coastal lagoons and lakes and surrounding development.

From the mapping currently available it appears that coastal hazard land and coastal environmental land do not always overlap. This means that environmental impacts such as adverse impacts on the biophysical or hydrological environment or geomorphology, do not have to be considered when assessing development on coastal vulnerability land. The considerations applicable to the development of coastal environmental land should also apply to all coastal vulnerability land.

5. Wording of the SEPP document

Page 7 Development of coastal wetlands and littoral rainforests area

11 (4) needs to be amended to include a provision for no net loss of the coastal wetland or littoral rainforest. Littoral rainforests are already rare and becoming so fragmented that their capacity to exchange genetic material with neighbouring littoral rainforests and evolve with climate change is being threatened by further size reduction.

Page 8 Coastal vulnerability area

13 (2) (a) *or provides for beach nourishment* should be deleted from this clause as beach nourishment is not something that could be relied upon in the longer term with the onset of climate change.

6. Future Revision of Maps

The final comment is about the procedures to change Coastal Use Area and Coastal Management maps in the future. These changes should only be able to be made with both scientific and public consultation.

Yours sincerely

A handwritten signature in black ink that reads "Jill Green". The script is cursive and fluid, with the first letters of each word being capitalized and prominent.

Jill Green

President