

## **CAMPBELLTOWN CITY COUNCIL SUBMISSION –**

### **DRAFT STATE ENVIRONMENTAL PLANNING POLICY (COASTAL MANAGEMENT)**

#### Background

The NSW Government has placed the Draft State Environmental Planning Policy – Coastal Management (2016) on public exhibition following the passing of the Coastal Management Bill (2016) by the NSW Parliament. These are part of a suite of coastal planning reforms that will update and integrate the existing planning framework including the *NSW Coastal Management Act, 1989*, *NSW Coastal Protection Act, 1979*, *NSW Coastal Policy*, *State Environmental Planning Policy 71 (Coastal Protection)*, *State Environmental Planning Policy 14 (Coastal Wetlands)*, *State Environmental Planning Policy 26 (Littoral Rainforest)* and the Coastal Zone Maps.

The reforms aim to establish a more streamlined and modern planning framework for coastal management, to allow planning authorities to address current and future coastal issues to protect and enhance the natural values of the coast, allow for public enjoyment of beaches and foreshores and plan for coastal hazards and threats.

#### Issues

The Campbelltown Local Government Area (LGA) has been identified as being affected by the draft SEPP for coastal management. It was not previously identified in the existing SEPPs or legislation outlined above, nor is the LGA subject to coastal or estuarine processes or issues and its waterways are non-tidal.

Council has also been requested by the Department of Planning and Environment to update the relevant notations on its 149 planning certificates to reflect the mapping in the draft SEPP.

Council has reviewed the GIS data relating to the areas of the Campbelltown LGA mapped in the draft SEPP. There are three small areas mapped as Coastal Wetlands in the draft SEPP within the Campbelltown LGA.

This submission evaluates the validity of the mapping and its outcomes in relation to the SEPP criteria.

#### Discussion

Three small areas have been mapped within the Campbelltown LGA as Coastal Wetlands in the draft SEPP. The mapping has been derived from the Office of Environment and Heritage's 2013 Native Vegetation Study of the Sydney Metropolitan Area and includes polygons within the Campbelltown LGA that are mapped as Coastal Freshwater Wetlands.

Locations and descriptions of these areas are as follows:

- Area 1 - north of St Andrews adjacent to the M31 Freeway – a dammed and channelised part of Bunbury Curran Creek

- Area 2- north of St Andrews adjacent to the M31 Freeway – a dammed section of Bunbury Curran Creek
- Area 3 - a farm dam on a property at 70 Raby Road, Varroville.

### Analysis

The SEPP aims to *'promote an integrated and co-ordinated approach to land use planning in the coastal zone in a manner consistent with the objects of the Coastal Management Act 2016'* by *'mapping the 4 coastal management areas which comprise the NSW coastal zone, in accordance with the definitions in the Coastal Management Act'* (section 3c).

Section 6 of the Coastal Management Act 2016 (CMA) defines coastal wetlands as being *'lands which display the hydrological and floristic characteristics of coastal wetlands ... and land adjoining these features'*. In this regard Council has undertaken an assessment of each of the sites against:

- the management objectives for coastal wetlands as prescribed in Section 6.2 of the CMA 2016
- The floristics and hydrological characteristics outlined in the profile description of Coastal Freshwater Wetlands (OEH 2013)
- NPWS vegetation mapping (2003)

This assessment is presented in Table 1 below. Aerial imagery and vegetation mapping (SMA Veg mapping, OEH 2013) for each of the sites is also provided in Table 2.

### Conclusion and Recommendation

Based on the information presented in this submission, Council is of the view that the three areas do not constitute coastal freshwater wetlands. The sites are dammed sections of creeks and are located at a higher elevation than coastal freshwater wetlands at the middle to upper elevations of the Cumberland Plain at over 40km from the coast.

The areas do not meet the management objectives for coastal wetlands and do not contribute to the aims of the Draft Coastal SEPP to promote an integrated and co-ordinated approach to land use planning in the coastal zone in a manner consistent with the objects of the *Coastal Management Act 2016*. Accordingly it is recommended that the draft SEPP and associated maps be amended to exempt these areas and more broadly the Campbelltown LGA, from its application.



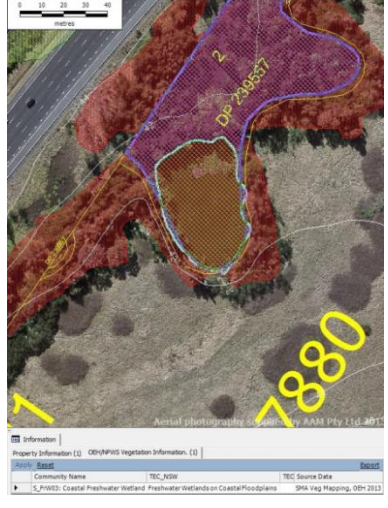

Table 1. Criteria assessment of waterbodies

Criteria for assessment		Area 1	Area 2	Area 3
<b>Location</b>	Property Address	Lot 21 Campbelltown Road, Ingleburn Lot 201 Campbelltown Road, Ingleburn	Lot 1 St Andrews Road, St Andrews Lot 2 DP 239557	70 Raby Road, Varroville
	Parcel details	Part Lot 1 DP 1068927 Part Lot 2 DP 1068927	Part Lot 2 DP 1068927	Lot 456 DP 1097044
	Locality	North of St Andrews Eastern side of M31 Freeway	North of Raby western side of M31 Freeway	Rural land at Varroville
<b>Description</b>	Hydrology	Part of Bunbury Curran Creek	Part of Bunbury Curran Creek	Tributary of Bunbury Curran Creek
	Waterbody	Previously dammed and channelised	Previously dammed and channelised	Farm dam
	Elevation	~35m asl	~42m asl	~70m asl
<b>CMA 2016 Objectives (S6.2)</b>	Protect coastal wetlands in their natural state including biological diversity and ecosystem integrity	Not a coastal wetland in its natural state, is non-tidal	Not a coastal wetland in its natural state, is non-tidal	Not a coastal wetland in its natural state, is non-tidal
	Promote rehabilitation and restoration of degraded wetlands	NA as site is a dammed section of creek	NA as site is a dammed section of creek	NA as site is a dammed tributary of creek
	Improve resilience of coastal wetlands to the impacts of climate change	NA	NA	NA
	Support social and cultural values of coastal wetlands	NA	NA	NA
	Promote objectives of State policies and programs for wetlands management	NA	NA	NA
<b>OEH Profile Description for Coastal</b>	Associated with freshwater lagoons and swamps on alluvial flats and sand depressions	Soil is described as South Creek soil landscape of Quaternary Alluvium (alluvium, shale, sand and	Soil is described as South Creek soil landscape of Quaternary Alluvium (alluvium, shale, sand and	Soil is described as South Creek soil landscape of Quaternary Alluvium (alluvium, shale, sand and

Freshwater Wetlands, 2013		silt).	silt).	silt).
		The site is not associated with a freshwater lagoon or a swamp.	The site is not associated with a freshwater lagoon or a swamp.	The site is not associated with a freshwater lagoon or a swamp.
	Lagoons have fluctuating levels of standing water that gives rise to a varied assemblage of species	The site is a section of Bunbury Curran Creek that has been filled, channelised and dammed, creating an artificial deeper linear water body.	The site is a section of Bunbury Curran Creek that has been filled, channelised and dammed, creating an artificial deeper linear water body.	The site is a section of Bunbury Curran Creek that has been filled, channelised and dammed, creating an artificial deeper linear water body.
		Water levels in the dammed section of creek will fluctuate with rainfall.	Water levels in the dammed section of creek will fluctuate with rainfall.	Water levels in the dammed section of creek will fluctuate with rainfall.
	Include a range of sedges, rushes and aquatic herbs with woody shrubs and small trees found only on the margins of the wetlands in low abundance	Range of sedges, see below Casurinas, a lot of weed species and saltbush present	Range of sedges, see below Casurinas, a lot of weed species and saltbush present	Limited range of sedges: <i>Carex</i> and <i>Baumea</i> spp. <i>Eucalyptus moluccana</i> and 1 x <i>Eucalyptus amplifolia</i> present along with <i>Bursaria spinosa</i>
	Tall reedlands (>3m in height) may dominate individual wetlands. <i>Typha orientalis</i> typically dominant in urban wetlands +/- <i>Phragmites australis</i> ; tall reeds include <i>Eleocharis sphacelata</i> and tall sedges ( <i>Baumea</i> spp.), open water margins have aquatic herbs <i>Isachne gibbosa</i> and <i>Persicaria decipiens</i> . Less frequently inundated wetlands have few species of sedges or rushes ( <i>Carex appressa</i> +/- <i>Baumea</i> spp.	Reedlands all less than 3m in height.  <i>Typha orientalis</i> , <i>Phragmites australis</i> and <i>Persicaria decipiens</i> present.	Reedlands all less than 3m in height.  <i>Typha orientalis</i> , <i>Phragmites australis</i> and <i>Persicaria decipiens</i> present.	Reedlands all less than 3m in height.  <i>Typha orientalis</i> , <i>Carex</i> spp and <i>Baumea</i> spp present. Other species specified not present

Most commonly found at low elevations less than 5m above sea level on coastal plains and flats. Several swamps occur on highly disturbed floodplains of the Cumberland Plain where elevations reach 20 metres above sea level	Elevation 34-36m asl	Elevation ~42m asl	Elevation ~70m asl
<b>NPWS mapping 2003</b>	Alluvial Woodland < 10% canopy cover	Alluvial Woodland < 10% canopy cover	Alluvial Woodland < 10% canopy cover
<b>SMA Veg mapping, OEH 2013</b>	Coastal Freshwater Wetland	Coastal Freshwater Wetland	Coastal Freshwater Wetland

Table 2. Aerial imagery and vegetation mapping

Area	Vegetation mapping	Aerial image
1		
2		
3	