



## HUNTER'S HILL COUNCIL

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15 December 2016

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

Dear Sir/Madam,

### **Draft Coastal Management State Environmental Planning Policy (SEPP)**

Thank you for the opportunity to comment on the Draft Coastal Management SEPP which follows the making of the Coastal Management Act (the Act) in June 2016. In general Council is very supportive of the new Act and draft SEPP which aims to promote an integrated and coordinated approach to land use planning in the coastal zone.

The Department is to be commended on the mapping work which includes the Sydney Metropolitan area and while some further adjustments are anticipated, recognising and defining our foreshores as some of the most economically, socially and environmentally valuable land in NSW is a step in the right direction.

Please refer to the attached table for Council's detailed comments with regard to the Draft SEPP and mapping.

Council notes the requirement in the draft SEPP for a Coastal Management Program and our understanding that this is satisfied for a five year period by the recently certified Lane Cove River Coastal Zone Management Plan and the Parramatta River Coastal Zone Management Plan.

Should you wish to discuss any of the matters raised in this submission please do not hesitate to contact our Senior Strategic Planner - Philippa Hayes on 9879 9442.

Yours sincerely,

Steve Kourepis  
**Group Manager Development and Regulatory Control**

# Hunters Hill Council – Submission regarding Draft Coastal Management SEPP

Ref. Draft SEPP	Comment
Page 3 Aim	<p>Council is supportive of the aim of the policy but considers further work is required to enable part (b) of the aim.</p> <p>(b) establishing a framework for land use planning to guide decision making in the coastal zone.</p> <p>The draft SEPP specifies development that requires consent – however further information is required to determine what is acceptable vs an unacceptable development. i.e. consent is required for the damage or removal of marine vegetation – but what criteria are used to assess if the extent proposed is acceptable or not?</p> <p>The Draft SEPP does not appear to set limits on development or provide detailed development controls. Without this guidance different Councils, consultants and developers will apply varying standards and the potential strength of the SEPP will be undermined.</p>
P7 Coastal Wetlands	SEPP 14 specified that consent was required for restoration works – however the draft SEPP is silent on this.
P7-8 Proximity to Coastal Wetlands (2)	Clause 2 (a) acts to exclude land from Zone, R1,R2,R3,R4, R5 or RU5. Council does not support this exclusion as impacts of residential development on the biophysical, hydrological or ecological integrity of adjacent coastal wetlands can be significant.
P8 13 (2) (b)	The wording “ <i>is not likely to cause increased risks</i> ” is too open and exposes the assessment authority to liability.
P8 13 (d) & (e)	Clause (d) and (e) could result in conflict - it is possible a development to manage risk to life and public safety may reduce public amenity. Which consideration is given priority?
P9 14 Coastal Environment	Part (c.) The definition of “marine estate” requires the accurate mapping of coastal wetlands.
P9 15 (b)	Clause (b) – <i>has taken into account</i> –needs to be replaced by wording that assists assessment officers with decision making.
P9 (f)	What definition of water sensitive design is to be used?
P11	Joint Regional Planning Panel have been replaced by Sydney Planning Panels
P16 3.2 Insert (c.)	Insert (c.) only references coastal wetlands or littoral rainforests but should also include the coastal environment area and coastal vulnerability area – both of these designate environmentally sensitive areas.

Mapping	Comment
Coastal Wetlands	The Coastal Wetlands mapping is not comprehensive. In Hunters Hill the draft SEPP wetlands mapping has excluded valuable Saltmarsh areas and estuary areas. Council has mapping of these areas.
Coastal Vulnerability Areas	Hunters Hill Local Government area includes areas affected by sea level rise as mapped in the Lane Cove River and Parramatta River Coastal Zone Management Plans. It is considered the framework for assessing and mapping Coastal Vulnerability needs to be at the very least coordinated at State level. Without a coordinated approach different Councils will vary in their assessment of what land is Coastal Vulnerability area.