



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

20.1.16

Dear Sir/Madam,

We write to express our concerns regards the Draft Coastal Management SEPP and Draft Coastal Mapping. Overall, we feel that they will weaken protection of our sensitive coastal zones and wetlands which are already being degraded from the impacts of a changing climate. This has resulted in significant biodiversity loss, reduced benefit from the ecosystem services these natural coastal areas and wetlands provide and increased risks to property and in people's use of these areas.

Legislative controls over such sensitive natural areas and their complex ecosystems need to be strengthened not weakened if we are to ensure a viable and healthy coastal zone for future generations to enjoy and benefit from.

We make the following comments in point form:

- The separation of the coastal zone into four management areas introduces inconsistencies in protection. It is a somewhat artificial management approach which may fail to identify the particular ecological processes and constraints operating in a specific location. There is a concern that this approach to management of local foreshore areas will fail to take account of the particular risks and conditions arising from degradation caused by past inappropriate urban expansion and land uses, such as the many rubbish tips and land reclamation that have been built along the foreshore of Sydney Harbour. These old land fill areas are common in our area along the local bays and the future opportunities for improved biodiversity outcomes from sensitive reclamation and ecological restoration projects should not be limited by the new SEPP.
- We object to the removal of the concurrence provisions within in the existing SEPP 14 and SEPP 26. Such concurrence requirements provide an important check within the environmental planning and

assessment processes for development which impacts coastal wetlands. The removal of these provisions will most likely mean reduced ecosystem health in our coastal areas.

- From our observation climate change is already causing changes to our local wetland in the Field of Mars Reserve and Wildlife Refuge, East Ryde. The original wetland at the confluence of Buffalo and Stranger's Creeks has had large areas disturbed from when the wetland was used as a land fill area in the mid 1960s. Despite this earlier land use there is still a remnant of endangered saltmarsh vegetation community along Buffalo Creek as well as some mangroves and native reeds. This area improves the biodiversity in the reserve and provides habitat for threatened species and important ecosystem services. This remnant area is suffering further degradation from increased fresh water inundation and longer periods of dry, hot days which is also affecting the overall quality and structural biodiversity of the surrounding native vegetation buffer areas. The notion of "coastal hazard" must be adequate in its definition and rigorous in its application to ensure that it can capture the current processes of a changing climate and also manage future impacts resulting in biodiversity loss and reduced ecosystem function.
- We lack confidence that, during the environmental assessment process, the proposed draft SEPP will trigger the specific consideration of the wide range of impacts, both physical and ecological, arising from development in coastal wetlands. Generic and limited environmental assessment will result in further degradation of wetlands and diminish their important role in aquatic and intertidal ecosystems.
- The mapping process appears simplistic and inadequate. There is a need for rigorous assessment and ground truthing of those areas that are more ecologically complex so as to better inform the mapping. This must take account of past land uses that may have modified the natural ground levels and compromised the dynamic processes within the coastal zone. Some important ecosystem services are still being delivered even within these highly modified coastal environments and wetlands.
- This inadequate mapping is compounded by the arbitrary setting of a 100m management zone around wetlands. For example the Buffalo Creek wetland has been inadequately mapped (this is despite numerous scientific assessments that have identified the remnant saltmarsh and estuarine area). The drawing of the 100m zone around the inadequately identified wetland area means that the "coastal use" zone is mostly in the intertidal zone of the wetland area and no hazard area has been identified despite the area being identified as a high risk area in recent flood modelling.
- It is unclear whether the inadequacies in the hazard mapping reflect differences in Council area regards their development of hazard maps

(Buffalo Creek flows through both Ryde and Hunters Hill LGAs). Regardless of the reason for this particular discrepancy, those Councils across NSW who have undertaken the sensible initiative to commence a rigorous and broad assessment of coastal hazards in their planning controls should not have to wait another five years for other Councils to “catch up”. If a Council’s hazard mapping meets necessary standards they should be able to apply this information immediately ie on property titles, via their planning controls etc. and not be made to wait another five years for other Councils to undertake the assessments and mapping.

Coastal areas and wetlands are dynamic and important natural areas which require strong and effective protections within any new Coastal SEPP. We feel that the draft Coastal SEPP fails to consider some of the more complex processes affecting our coast lines and wetlands. The impacts of a changing climate are both known and unknown and the proposed new Coastal SEPP must have the capacity to taken account of the range of new conditions affecting coastal areas. Without this capacity and the preparation of evidence based maps it will fail to “future proof” our precious and much loved coastlines and wetlands from further degradation and biodiversity loss.

Thank you for an opportunity to comment.

Yours sincerely

Cathy Merchant  
Committee Member