

Department of Planning & Environment  
GPO Box 39  
Sydney NSW 2001  
Attn. Ms Maria Plytarias

3 February 2017

Dear Ms Plytarias,

**Re:** Draft Coastal Management State Environmental Planning Policy (SEPP)

I refer to the Draft Coastal Management SEPP exhibited for comments by Department of Planning & Environment and extension of time provided to Willoughby City Council to comment on the subject Draft Coastal Management SEPP.

Willoughby City Council is generally supportive of the Draft Coastal Management SEPP as it intends to better equip councils and coastal communities to plan for and effectively respond to coastal challenges such as major storms, coastal erosion and climate change impacts, through more strategic planning around coastal development and emergency management.

Willoughby City Council also welcomes the opportunity to provide comments in relation to the Draft Coastal Management SEPP.

Finally, Willoughby City Council believes that it is important to ensure that all potentially affected land owners are actually involved in processes that could impact privately owned land. As such Council always notifies affected land owners and occupiers of proposed changes to planning controls. As the Draft Coastal Management SEPP proposes to introduce controls affecting a significant number of private properties, Willoughby City Council seeks assurance that all affected land owners and occupiers will be notified of this matter.

Please find attached a submission prepared by our planning department in relation to the above.

Should you have any questions please contact Pooja Chugh on 9777 7603 or [pooja.chugh@willoughby.nsw.gov.au](mailto:pooja.chugh@willoughby.nsw.gov.au)



Ian Arnott  
**Manager Planning**

## ENGLISH

If you do not understand this document, please visit Council's Administration Building to discuss it with Council staff who will arrange an interpreter service. The Administration Building is located at 31 Victor Street, Chatswood and open from 8.30am to 5pm, Monday to Friday. Alternatively, you may ring the Translating & Interpreting Service on 131 450 to ask for an interpreter to contact Council for you. Council's phone number is (02) 9777 1000.

## ARABIC

إذا كنت لا تفهم هذه الوثيقة يرجى زيارة مبنى إدارة مجلس البلدية لمناقشتها مع موظفي المجلس الذين سيتخذون ترتيبات للحصول على خدمة الترجمة التفسيرية. يقع مبنى الإدارة على العنوان 31 Victor Street, Chatswood وهو مفتوح من الساعة 8.30 صباحاً إلى 5 مساءً أيام الاثنين إلى الجمعة. يمكنك بدلاً من ذلك الاتصال بخدمة الترجمة التفسيرية والتشويقية على الرقم 131 450 وإطلب أن يقوم مترجم شفوي بالاتصال بالمجلس بالبلدية عنك. رقم هاتف المجلس هو: (02) 9777 1000.

## ARMENIAN

Եթե չէք հասկանում այս փաստաթուղթը, խնդրում սպասեցե՛ք Քաղաքային Խորհուրդի Վարչարանին: Եկե՛ք այդ մասին խոսելու: Քաղաքային Խորհուրդի աշխատակիցներն հետ որոնք ձեզի համար թարգմանի մը կը կարգադրեն: Վարչարանին Եկե՛ք կը գտնուի՝ 31 Victor Street, Chatswood եւ բաց է կ.ա. 8.30 – կ.կ. 5.00: Երկուշաբթիէն մինչեւ Դուրրաբ: Կարելի է նաեւ հեռաձայնիկ Թարգմանութեան Մատասարկութեան՝ 131450 եւ խնդրել որ թարգմանի մը կապ հաստատուի: Քաղաքային Խորհուրդին հետ ձեզի համար Քաղաքային Խորհուրդի Ինտերֆաշի համարն է՝ (02) 9777 1000:

## CHINESE SIMPLIFIED

如果您不明白本文件，请前往市政府行政大楼，与市政府职员讨论，市政府职员会安排传译员提供服务。行政大楼位于31 Victor Street, Chatswood，上班时间是周一至周五上午8:30至下午5:00。此外，您也可以致电翻译传译服务处，电话131 450，请传译员为您联系市政府，市政府的电话是(02) 9777 1000。

## CHINESE TRADITIONAL

如果您不明白本文件，請前往市政府行政大樓，與市政府職員討論，市政府職員會安排傳譯員提供服務。行政大樓位於31 Victor Street, Chatswood，辦公時間是週一至週五上午8:30至下午5:00。此外，您也可以致電翻譯傳譯服務處，電話131 450，請傳譯員為您聯絡市政府，市政府的電話是(02) 9777 1000。

## CROATIAN

Ako ne razumijete ovaj dokument, molimo vas otidite u administrativnu zgradu općine i razgovarajte s osobljem općine koje će vam organizirati usluge tumača. Zgrada općine se nalazi na adresi 31 Victor Street, Chatswood i otvorena je od 8.30 izjutra do 5 poslije podne, od ponedjeljka do petka. Druga mogućnost je da nazovete Službu prevoditelja i tumača (Translating and Interpreting Service) na 131 450 i da ih zamolite da vam nazovu općinu. Broj telefona općine je (02) 9777 1000.

## GREEK

Αν δεν καταλαβαίνετε αυτό το έγγραφο, παρακαλούμε επισκεφθείτε το Κύριο Διοικητήριο της Δημάρχιας για να το συζητήσετε με το προσωπικό της Δημάρχιας που θα οργανώσει διερχόμενα για την εξυπηρέτησή σας. Το Κύριο Διοικητήριο βρίσκεται στη διεύθυνση 31 Victor Street, Chatswood και είναι ανοιχτό από τις 08:30 π.μ. έως 5 μ.μ., Δευτέρα έως Παρασκευή. Διαφορετικά, μπορείτε να τηλεφωνήσετε στην Υπηρεσία Μεταφράσεων και Διερμηνείας στο 131 450 και να ζητήσετε από ένα διερχόμενα να επικοινωνήσει με τη Δημάρχια για λογαριασμό σας. Ο αριθμός τηλεφώνου της Δημάρχιας είναι (02) 9777 1000.

## ITALIAN

Se avete difficoltà nel capire il presente documento, rivolgetevi all'Amministrazione Building del Comune e gli addetti municipali provvederanno a richiedere l'assistenza di un interprete. L'Amministrazione Building è situato al n. 31 di Victor Street, Chatswood ed è aperto dal lunedì al venerdì, dalle 8.30 alle 17. Oppure potete chiamare il Translating and Interpreting Service al 131 450 e chiedere loro di mettersi, per vostro conto, in contatto con il Comune. Il numero telefonico comunale è (02) 9777 1000.

## JAPANESE

本文書が理解できない場合には、カウンスルの事務局にお越しいただければ、カウンスル職員が通訳サービスを手配の上で、ご相談に応じます。事務局の住所は、31 Victor Street, Chatswoodで、窓口受付時間は月曜から金曜の午前8時半から午後5時までです。他にも、電話131450の翻訳通訳サービスにおかけの上、通訳士にカウンスルにつなぐように依頼することもできます。カウンスルの電話番号は、(02) 9777 1000です。

## KOREAN

이 문서를 이해하지 못할실 경우 시의회 청사를 방문하셔서 시의회 직원과 이해 대해 문의하십시오. 시의회 직원이 통역사 서비스를 주선할 것입니다. 시의회 청사는 31 Victor Street, Chatswood에 위치하고 있으며 월요일에서 금요일, 오전 8시 30분에서 오후 5시까지 오픈합니다. 아니면 여러분이 직접 번역통역서비스에 131 450으로 전화하셔서 통역사에게 시의회에 연락하여 여러분과 연결하도록 요청하십시오. 시의회 직원번호는 (02) 9777 1000입니다.

## **SUBMISSION - DRAFT COASTAL MANAGEMENT SEPP**

### **Background**

The Coastal Management State Environmental Planning Policy (SEPP) aims to establish a new, strategic land use planning framework for coastal management.

The Coastal Management SEPP will consolidate current coastal-related SEPPs. It will replace SEPP 14 (Coastal Wetlands), SEPP 26 (Littoral Rainforests) and SEPP 71 (Coastal Protection) and aims to ensure that future coastal development is appropriate and sensitive to the coastal environment, and that public access to beaches and foreshore areas is maintained. The Coastal Management SEPP intends to better equip councils and coastal communities to plan for and effectively respond to coastal challenges such as major storms, coastal erosion and climate change impacts, through more strategic planning around coastal development and emergency management.

### **Submission**

- Willoughby City Council seeks clarification with regard to the relationship of the SEPP (Coastal Management) to the Sydney Regional Environment Plan (SREP). Council notes that the SREP and its associated DCP include provisions relating to biodiversity, ecology, environment protection, public access and use, scenic quality and view sharing. In this regard, Council considers that the Coastal Management SEPP 2016 may lead to duplication and inconsistencies.
- Division 1, Clause 12(1)(a) and Division 3, Clause 14(1)(a) in Part 2 of the SEPP (Coastal Management) requires Council to consider the likely impact of the proposed development on biophysical, hydrological (surface and ground water) and ecological environment prior to granting consent. In this regard, the SEPP (Coastal Management) puts the onus on Council to assess such impacts. Council recommends that guidelines/criteria, practice notes or technical assistance/training should be provided to the staff to ascertain and enable assessment of the likely impacts of the proposed development in this regard.
- Division 1, Clause 12(1)(b) in Part 2 of the SEPP (Coastal Management) requires Council to consider the likely impact of the proposed development on the quantity and quality of surface and ground water flows to the adjacent Coastal Wetland if the development is on land within the catchment of the Coastal Wetland. Council recommends that guidelines/criteria, practice notes or technical assistance/training should be provided to the staff to ascertain and enable assessment of the likely impacts of the proposed development in this regard.
- The SEPP (Coastal Management) notes that Clause 12(2)(a) does not apply to land within Zone R1, R2, R3, R4, R5 or RU5 under an environmental planning instrument or in a land use zone that is equivalent to any of those zones. Willoughby Local Environmental Plan (WLEP) 2012 includes E4 Environmental Living Zone with the objective of providing low-impact residential development in areas with special ecological, scientific and aesthetic values. In this regard, Council seeks clarification as to whether Clause 12(2)(a) will apply to land zoned E4 under the provisions of WLEP 2012. If it does apply, Council recommends that the SEPP (Coastal Management) should be more specific in noting that the provisions of the subject clause applies to E4 and equivalent zones to remove any ambiguity.

- Council recommends that the SEPP (Coastal Management) should identify any additional requirements that Council should consider for development on land in proximity to Coastal Wetlands and within Coastal Environmental areas. If there are additional requirements, Council recommends that guidelines/criteria, practice notes or technical assistance/training should be provided to the staff to ascertain and enable assessment of the likely impacts of the proposed development in this regard.
- The Department of Planning issued a Planning Circular requesting that Councils place a notation on Section 149 Certificates as to whether a property is wholly or partially affected by the Draft SEPP (Coastal Management). It is requested that notice be given to Council in advance of the making of the SEPP and that Council be notified of any amendments regarding the mapping of the wholly / partially affected lands. This will enable any mapping amendments to be made to affected properties and removal of the word "Draft" from the Certificates in time with the making of the SEPP (Coastal Management).
- It is noted that the Coastal wetlands identified and the associated Proximity Areas generally fall within the reserve network managed by Willoughby City Council. The two key groupings are along the Lane Cove River and Sugarloaf Bay in Middle Harbour and lie within Mowbray Park, North Arm Reserve, Willis Park, Harold Reid Reserve and the Castlecrag Northern Escarpment. Council recommends that the current environmental protection and restoration work in those areas should continue as it supports the objectives of the SEPP (Coastal Management). It is desirable that the SEPP (Coastal Management) should not create bureaucratic obstacles to the continuity of that work in the form of additional approval processes and categorise such works to be a Designated Development for the purpose of the Act.
- The mapping on the Planning NSW website is much less detailed than the maps of wetland areas identified in the Lane Cove River Coastal Zone Management Plan, (2013) which include Saltmarsh areas and inundation zones. In this regards, Council recommends that the relevant maps are updated.