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

1 February 2017

Dear Sir/Madam,

**Re: Public Exhibition of the NSW Coastal Management Reforms – Draft State Environmental Planning Policy (Coastal Management) 2016 and Maps**

The Parramatta River Catchment Group (PRCG) would like to thank you for this opportunity to comment on the Draft State Environmental Planning Policy (Coastal Management) 2016 and associated maps. The area covered within this Policy includes the estuarine section of the Parramatta River and its associated foreshores, including dozens of kilometres of seawalls, hence our direct interest in the new SEPP.

The Parramatta River Catchment Group (PRCG) is a regional, non-statutory organisation of local councils, government agencies and community groups who share responsibility in managing the health of the Parramatta River and its catchment area. Our mission is to make the Parramatta River swimmable again by 2025. Financial members include all 11 Councils that lie within the catchment, as well as Sydney Water, the Department of Planning and Environment and the Environment Protection Authority.

Today, around three quarters of Sydney's residents live, work in, or visit the area along the Parramatta River and, by 2050, it is anticipated that 4 million or more individuals will be living in the river's surrounding suburbs. Now, more than ever, it is crucial that this gem of Sydney is restored to a healthy and swimmable place for all to enjoy. This will have positive, broad reaching social and economic impacts and help sustain and attract local biodiversity.

In 2016, the Parramatta River Estuary Coastal Zone Management Plan was certified in accordance with Section 55G of the Coastal Protection Act. It provides a legislated long term Plan for the Parramatta River estuary, which extends across 8 local government areas, and guides councils and other major land owners in collectively managing the health of this important and iconic waterway.

The PRCG, in partner with its member organisations, is also currently developing a Masterplan for the Parramatta River, to provide the roadmap for making the river swimmable

again. This Masterplan is due for completion mid 2017 and, once completed, should gain recognition as a key policy document for the Parramatta River catchment, alongside this new SEPP and the existing CZMP.

Table 1 below outlines our recommendations and associated comments on the current draft SEPP and maps.

We look forward to your response to these recommendations. We also welcome the opportunity within the next year to provide input into the review of how this new policy is operating in practice, act as a conduit between your Department and local Councils and to amend the mapped areas based on new evidence.

Again, thank you for this opportunity to comment.

Yours sincerely,



**Sarah Holland Cliff**  
Parramatta River Catchment Group Coordinator

**Table 1: PRCG recommendations and comments on Draft State Environmental Planning Policy (Coastal Management Act) 2016 and associated maps.**

	Recommendation	Supporting details
<b>Relationship with other Plans</b>		
<b>1</b>	Provide confirmation to the PRCG and affected Councils that the certified Parramatta River Estuary Coastal Zone Management Plan (CZMP) satisfies the stated requirement in the draft SEPP for a Coastal Management Program for the next 5 years.	Our current understanding is that the CZMP satisfies this stated requirement, but through our enquiries we have been unable to gain a clear answer regarding this.  Given the time, cost and extensive consultation involved in developing and certifying the current CZMP, it would be unfortunate if we had to replace it prematurely.
<b>2</b>	Provide clarity on the relationship between the draft SEPP and other overlapping documents, namely the Sydney Regional Environment Plan (Sydney Harbour Catchment) 2005 (SHCREP) and associated Development Control Plan.	The land to which the draft SEPP applies is also subject to the SHCREP and associated DCP and the relationship between these documents and the draft SEPP is currently unclear. It is important that these well supported instruments are not weakened as a result of this new SEPP.
<b>Mapping</b>		
<b>3</b>	Provide clarity on the mapping	

	methodology used, to ensure transparency and consistency across areas, and guidance to Councils who may wish to amend them over time.	
4	Incorporate additional mapping data provided to you by our member Councils into the current SEPP map.	In particular, several coastal wetlands were missed within Parramatta, Ryde and Hunters Hill Local Government Areas, which need to be added.
5	Establish a clear and transparent mechanism to enable routine updating of maps as new information becomes available.	
<b>Development controls and water sensitive design</b>		
6	<p>Provide further details on development controls and limits on developments to ensure consistency across Councils, consultants and developers in applying standards for these.</p> <p>Remove ambiguous statements like 'likely' and 'significantly' and establish the policy standard that developments will not adversely impact on coastal management areas.</p>	The current definitions in Clause 12 and 14 around 'not likely to cause adverse impacts' and 'not likely to significantly...' are open to interpretation and variation across assessment bodies. Details should include criteria for biophysical, ecological, hydrological, geomorphological and cultural thresholds, and explain what these criteria are based upon. The policy needs to be more direct in ensuring that developments 'will not adversely impact' on coastal management areas. This is achievable and necessary if we are to ensure the benefits of clean waterways to the public in future.
7	Incorporate a requirement within the Part 2 Development Controls to consider the cumulative impacts of developments on the coastal zone, and extend this to the entire catchment.	<p>The current NSW Coastal Management Framework considers cumulative impacts of development in both Clause 8 of State Environmental Planning Policy No.71 (Coastal Protection) and in Clause 5.5 of the Standard Instrument (Local Environmental Plans).</p> <p>The lack of consideration of these in the draft SEPP in both the coastal area and the catchment may weaken its implementation.</p>
8	Provide further clarity and rigour to the definition of Water Sensitive Urban Design (e.g. on p9.).	NSW is currently the only state within Australia that does not have a statewide policy that supports the implementation of Water Sensitive Urban Design (WSUD). In addition, WSUD is not as clearly defined in NSW compared with other states. This new SEPP provides an opportunity to provide a clear and progressive definition of WSUD and push NSW forwards as a national leader in integrated water management.

		Stormwater and sewer overflows are the two most significant sources of pollution in the Parramatta River (Sydney Harbour Catchment Water Quality Improvement Plan 2015), which are currently preventing people from being able to swim and safely enjoy other river-based activities. Integration of Water Sensitive Urban Design features into existing and new developments along the river and within the catchment area will help achieve our regional mission, by improving the quality of stormwater entering the Parramatta River. This will serve to improve amenity and services to our region's growing population.
9	The NSW Government considers one SEPP on water sensitive design that covers the entire catchment of the Parramatta River and other Sydney River basins, and encompasses all development sizes.	The current draft SEPP only covers a small proportion of the catchment area of the Parramatta River and Sydney Harbour and may, therefore, be ineffective for long term coastal management. Effective coastal protection for urbanised catchments requires a catchment wide consistent approach to the reduction of impervious surfaces, improvement in stormwater quality, protection and enhancement of riparian zones and adjacent open space, and protection from coastal hazards.
<b>Coastal Vulnerability Area and Coastal Hazards</b>		
10	In mapping of Coastal Vulnerability Area, also incorporate specified future timeframes (in addition to current) to enable mapping of future exposure to coastal hazards.	This enables relevant controls to be applied to land thought to be exposed to Future Coastal Hazards due to projected sea level rise.
11	Provide greater clarity in draft Planning Circular PS16-003 regarding notification requirements for current exposure to a coastal hazard and future exposure to a coastal hazard (as per wording in current PS 14-003)	The current Planning Circular PS14-003 makes clear the notification requirements for current exposure to a coastal hazard versus future exposure to a coastal hazard.
<b>Adequate resourcing and training to implement and update the SEPP</b>		
12	Building on Recommendation 6, provide technical assistance and training to local council staff and other relevant people on the assessment of matters to ensure this consistency translates in practice.	Training is a critical element of any major policy change, to ensure the policy intent is achieved on ground.
13	Adequately resource Councils to undertake additional mapping and	Comprehensive mapping of the four coastal zones is key to the effectiveness of the new

	<p>implement their areas of responsibility within the new SEPP.</p>	<p>SEPP and the financial costs for this may be significant. There will also be additional financial burdens to Councils in adapting to and implementing the new SEPP that should be resourced adequately.</p> <p>For example, additional resourcing will be required by Councils to provide technical assessment and comment on relevant DAs once the SEPP is enacted. Also, Councils staff training will be needed for developments that are now considered within multiple coastal zones where conditions for consent require detailed examination to provide complete technical assessment before consent.</p>
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