

Our Ref: C18/110

6 March 2018

NSW Planning and Environment
c/o: online submission form

Dear Sir/Madam,

Proposal: Draft Camellia Town Centre Master Plan

DPI Fisheries, a division of NSW Department of Primary Industries, wishes to provide the following comment on the Draft Camellia Town Centre Master Plan, that was placed on public exhibition in February 2018.

DPI Fisheries is responsible for ensuring that fish stocks are conserved and that there is no net loss of key fish habitats upon which they depend. The Parramatta River and its associated mangrove habitats form important key fish habitat within Sydney. The protection of such habitats is reflected in the aquatic habitat protection (and enhancement) measures under Part 7 of the *Fisheries Management Act*, the associated *Policy and Guidelines for Fish Habitat Conservation and Management (2013)* and cl.21 of the *Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005*.

Mangrove Protection

The *Camellia Town Centre Draft Master Plan* depicts a boardwalk along the outer edge of a bend in the Parramatta River. Aerial imagery of this area clearly shows a large area of mangrove forest in this area. This heritage listed mangrove forest is not depicted in the draft Master Plan schematic. This suggests that it may be intended to remove or harm mangroves to construct the boardwalk.

Section 3.5 of the *Draft Camellia Town Centre Master Plan – Planning Report* states that existing mangroves along the Parramatta River Foreshore will be retained. However, as stated above, the schematic of the *Camellia Town Centre Draft Master Plan* shows that this may not be the case.

DPI Fisheries will not be authorising the harm or removal of mangroves to construct the public boardwalk or create views. This is aligned with statewide departmental mangrove protection policies and work to protect and improve foreshore habitat being conducted as part of the NSW Government's Marine Estate Management Planning Process. This process has involved extensive public consultation, including matters such as mangrove management.

The draft Master Plan schematic is misleading regarding the existence of mangroves in the area of the proposed boardwalk, does not appear to have considered the NSW Government's mangrove protection policies and may even be contrary to the marine vegetation protection measures within the Sydney Harbour REP.

Please note that DPI Fisheries was not consulted to provide input into design concepts that are more aligned with statewide mangrove protection policies.

Riparian Buffer Zones

DPI Fisheries commends the proposed re-instatement of a vegetated riparian buffer zone as part of this draft Master Plan. That said the preference of DPI Fisheries is for this vegetated buffer zone to include a far greater coverage of native riparian vegetation.

Adjacent to major urban waterways, such as the Parramatta River, DPI Fisheries recommends a riparian buffer zone width of 40m from the top of the riverbank. As no cross sectional buffer zone widths have been provided with the information supporting this draft Master Plan, it is not known whether this 40m buffer zone requirement will be met across this precinct.

The depicted situation of a path/boardwalk along what seems to be the top of the riverbank is concerning. Rivers are dynamic environments and such a location of the path places increased pressure to rock line the riverbank to protect the path. Lining such a large length of the riverbank with hard rock is a poor outcome for the environment of the Parramatta River. DPI Fisheries recommends that this path is set further back from the top of the riverbank to be more inclusive of the dynamic riverbank environment, and to potentially protect the riverbank environment with native riparian planting. Note that the harm of mangroves from riverbank protection measures or a public pathway should be avoided.

Water Quality Improvements

DPI Fisheries sees this project as an opportunity to improve water quality through the use of effective storm water quality improvement devices in the development of this precinct. This will assist in improving the quality of key fish habitat in the river. Consideration of mandating the use of effective WSUD treatment measures in the development of this precinct should be given in the development of this Master Plan.

Consultation prior to public exhibition

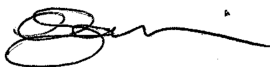
It is concerning that no consultation has been undertaken with DPI Fisheries prior to public exhibition in the preparation of this planning proposal. It is also concerning that DPI Fisheries was not contacted directly to provide comment on the public exhibition of this document.

Such consultation may have resulted in a more accurate depiction of mangroves in the area and the public exhibition of a proposal that was more aligned with State Government mangrove, riparian and foreshore management policies and legislation.

To ensure such projects are designed in accordance with the NSW State Government's aquatic habitat protection measures, DPI Fisheries strongly recommends up front early consultation on such future plans.

If you wish to discuss this response or require any further information, please contact me on 4222 8342.

Yours sincerely,



Carla Ganassin

Fisheries Manager, Aquatic Ecosystems