



The Palm Beach & Whale Beach Association Inc.

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15 September 2018

Marine Estate Secretariat
c/- NSW Department of Primary Industries
Locked Bag 1
NELSON BAY NSW 2135

By email: submissions@marine.nsw.gov.au

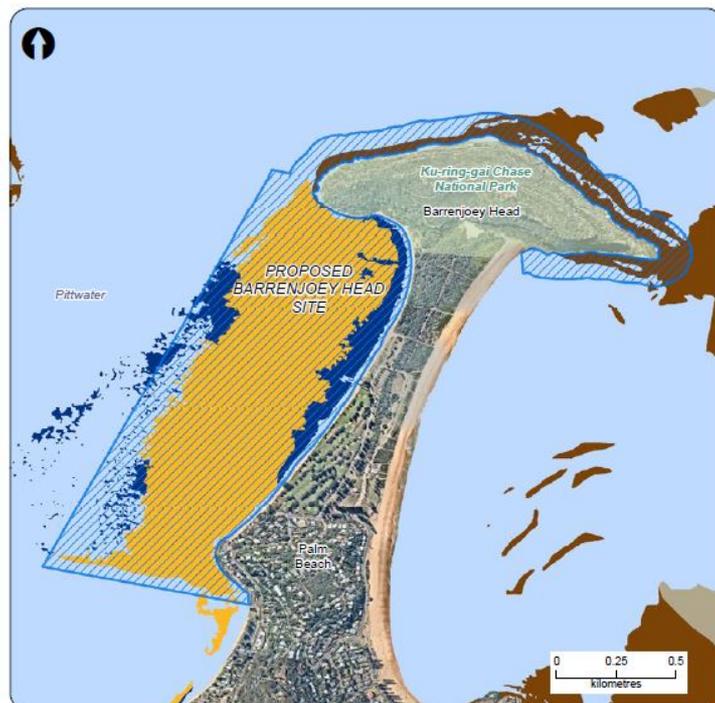
Dear Sir/Madam,

**SYDNEY MARINE PARK PROPOSAL
OBJECTION TO PROPOSED ANCHORING BANS OVER SEAGRASS**

This year marks the centenary of the PBWBA. In all of these 100 years, the association has upheld its tradition for careful consideration of environmental matters as can be seen from our Charter: *“Preserving and enhancing the natural beauty of the area and protecting its residential amenity”*.

The PBWBA is not only the oldest community association on the Northern Beaches - it is the association that covers some of the most stunning and sensitive topography within the Hawkesbury Shelf Marine Bioregion. It is also the association covering, by far, the greatest length of Northern Beaches foreshore - from Careel Head to Careel Bay via Barrenjoey.

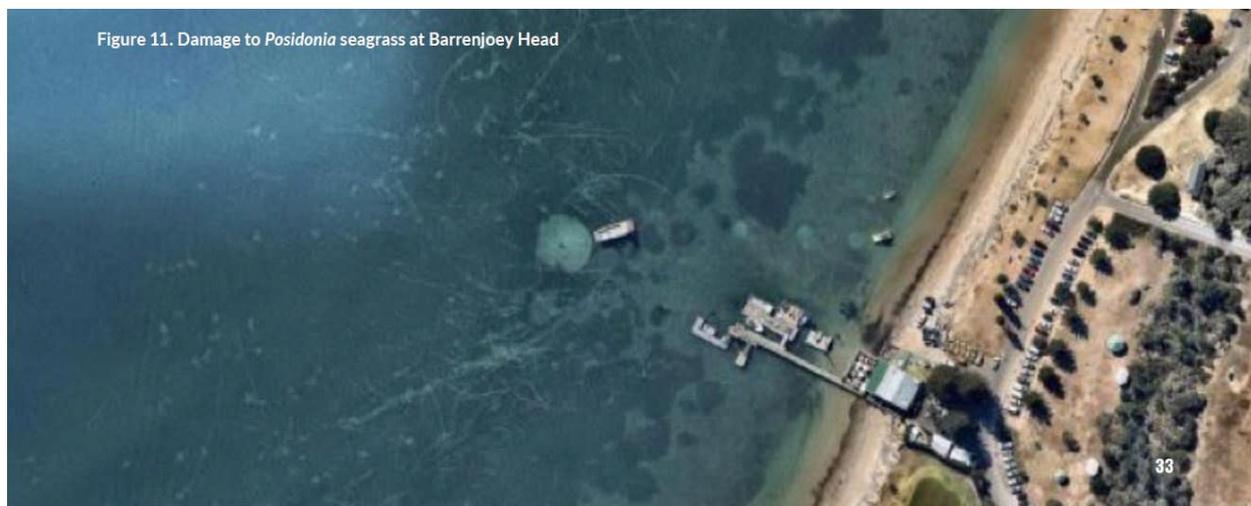
We understand MEMA is proposing a Special Purpose Zone as follows:



“ Preserving and enhancing the natural beauty of the area and protecting its residential amenity ”

Of particular note and concern is the proposal to ban anchoring over seagrass within the proposed Barrenjoey “Special Purpose Zone”.

We consider the anchoring bans to be entirely lacking in merit, and we reject these outright. As your own sketch indicates, the seagrass bed is 1,700m long and 500m wide, covering 850,000m². MEMA identifies some human disturbance to the seagrass bed (from boat propellers, anchors, and mooring chain) and describes this at page 33 as “significant damage”.



Whilst PBWBA commends MEMA’s objective – to promote protection of the seagrass – we do not agree that the disturbance caused by humans can be fairly described as “significant damage”. An aggregation of the human disturbance is of the order of 350m². This represents 0.04% of the seagrass bed. By any objective measure, this impact is inconsequential. It is fair to note that *Posidonia australis* is listed as an “endangered population”, but the key consideration for the “population” is the meadow’s ability to function as viable habitat within the ecological context. Impacts to 0.04% of the meadow do not threaten the viability of the meadow.

The socioeconomic and cultural costs of the proposed anchoring bans are too high, and far outweigh the highly questionable environmental dividend being pursued:

- The lee shore inside Barrenjoey Head is a critical anchorage for coasters navigating the east coast of NSW. It provides shelter for an overnight stay on the trip between Port Jackson and Lake Macquarie.
- The lee shore inside Barrenjoey Head is also a critical safe haven at any time for vessels escaping easterly and southerly gales.
- The wharf facility at the Boathouse is critical infrastructure supporting local businesses including the iconic Rose Bay to Palm Beach “Sydney by Seaplane” business. Anchoring activity in the waters off the wharf are an essential element of this commercial activity and various other activities linking Palm Beach with the western foreshore of Pittwater and the Central Coast.
- The southern end of the proposed “Special Purpose Zone” captures the wharf facility relating to Palm Beach’s oldest continuously-running maritime enterprise – Gonsalves Boatshed, dating back to c1912. The proposed anchoring ban over seagrass sets up a conflict with casual anchoring associated with this enterprise, and other recreational users of this space.
- The waters off Station Beach are used for recreational activity, including the beaching of craft for those who wish to come ashore to visit Governor Phillip Park, the Boathouse or the Lighthouse. Fore and aft anchoring is often used in these circumstances where a forward anchor is set in the deeper water (over seagrass) to properly secure the vessel. The

proposed anchoring ban over seagrass sets up a conflict with this recreational and cultural use of the area. This modern-day use of these waters as a casual anchorage mirrors the historical use by the Chinese “snappermen” of the 1800’s who brought their catch ashore here and operated a salting works to preserve their catch for export.

- The Station Beach intertidal is a popular location for walking the dog and is the subject of a current proposal with Northern Beaches Council to formally allow off-leash exercising and swimming of dogs. Although unrelated to the issue of the proposed anchoring ban, the establishment of a “Special Purpose Zone” here brings with it the possibility of a new mindset that deems frolicking dogs incompatible with the altered designation of the area. Any designation as “Special Purpose Zone” here must only be done on the basis that this would not establish a conflict with the presence of dogs in the shallows along Station Beach.

Thank you for the opportunity to register this strong objection to the proposal in its current form.

Yours sincerely,

PALM BEACH & WHALE BEACH ASSOCIATION INC.



Dr Richard West AM, President

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