RE: REVIEW OF RENTAL FOR DOMESTIC WATERFRONT TENANCIES IN N.S.W.

Please consider this and the attached document as a submission to the review of rentals for domestic waterfront tenancies.

I have read the submission to the Review from the Coastal Council of NSW. Both as an ecologist with experience in estuarine ecology and as the owner of a waterfront home on the Hawkesbury River, I found the Coastal Council's submission particularly interesting.

I concur with the Council regarding the importance of estuarine environments for fisheries, recreation and biodiversity conservation within the wider marine environment. However, the Council's assessment of the impact on these environmental values of waterfront occupancies is simplistic and overstated.

The impact of human settlement on coastal waterways along the entire Australian coast cannot be disputed. No river or estuarine system in southern Australia has escaped these human impacts and virtually all are degraded. Some, like the Murray-Darling, are highly degraded, others, like many along the New South Wales, are less affected. The impact of waterfront occupancies is, however, only a small part of the problem. It is simplistic to state that "Forshore occupations commonly reduce the ecological health of estuaries" and that occupiers of waterfronts should therefore bear a higher economic cost through rentals, incorporating environmental costs, when the degradation of estuaries and coastal waters in NSW is a consequence of a multitude of other human activities. This is the theme I developed in a paper written for the Royal Zoological Society's symposium on marine conservation earlier the year and appended to this email.

Degradation of coastal environments in NSW commenced with the first settlement of Europeans and accelerated through the 19th and 20th centuries as populations grew and residential, industrial and agricultural areas expanded. Waterfront occupations are only a small part of the impact and probably have a minor effect compared with the extraction of water for domestic, agricultural and industrial use, the discharge of wastes into coastal waters, runoff from agricultural lands, as well as roads and industrial and residential areas, commercial trawling, mineral extraction, increased fire frequency in catchments and, during the 19th Century, the mining of oyster shell, among other impacts. Moreover, it is mis-leading to imply that all waterfront occupations have a similar impact or, at least, levels of impact that can some way be distinguished through a scale of rentals.

Let me illustrate the latter. It is unlikely that waterfront occupations and structures along Wobby Beach (Shore) on the lower Hawkesbury have any effect on the estuary. This does not mean there are no domestic impacts from people living at Wobby, but their structures effectively mimic the naturally occurring rocky foreshores. No nursery grounds or sea grass beds are disturbed, as the waterfront is deep water. It remains biodiverse and productive despite the occupations. This is probably true for virtually all the domestic occupations and structures along the

waterfront of the lower Hawkesbury. Even on Dangar Island, where the waterfront changes from rocky to sandy to muddy foreshores, the impacts are minimal and unlikely to adversely affect fish nursery areas, subaqueous vegetation or lead to the loss of fish habitat as the Coastal Council's submission would have us believe. There have been impacts on the estuary of human settlement of Dangar Island, but the greatest of these impacts occurred in the 19th Century (see appended paper) and it is unreasonable to hold current waterfront occupations as responsible for those environmental impacts.

Consider the impact of the development of the towns of Umina and Ettalong on Brisbane Water. Large parts of these residential developments were constructed on land which as recently as the 1930s and 1940s formed extensive freshwater marshes and swamp forests of Melaleuca and Eucalyptus. Without question the filling of these wetlands for housing had a major impact on the ecology and environment of Brisbane Water, but few, if any, of the existing homes qualify as waterfront occupancies. Yet, to use the logic of the Coastal Council, shouldn't the occupiers of these former wetlands also pay a 'rental' which recognized the original impact of their homes on the estuary. The idea is patently absurd, just as it is to suggest that all waterfront occupations have a similar impact on the aquatic environment and that somehow this can be recovered through a scale of rentals.

If funds are required to restore estuarine environments, then the costs should be spread throughout the entire community in recognition of the fact that all residents of New South Wales contribute to the degradation of coastal waters and that some of the most significant impacts occurred decades and centuries earlier. I do not dispute the suggestion that waterfront occupiers have a special responsibility to manage waterfront structures so they have the least impact or that there is a need to facilitate public access to foreshores. However, domestic tenancies remain a trivial part of the problem relative to non-domestic activities such as oyster farming, industrial and transport developments, and marinas.

I trust the review will recognize the complexity of the issues involved and, should it require advice on the environmental and ecological impacts of waterfront occupations on coastal waters, that it will seek that advice from persons actively involved in marine and estuarine research.

Sincerely,

Emeritus Professor Harry F. Recher, FRZS