

**Submission to Sydney Coastal Councils Group
Feedback for Outer Sydney Harbour Coastal Management Program
30 March 2026**

The Willoughby Environmental Protection Association (WEPA) is a non-political community group dedicated to preserving natural heritage, protecting nature, and mitigating the impacts of pollution in our locality. We have been active for over 40 years with environmental advocacy efforts including: opposition to destructive plans for the Warringah Expressway; preservation of local foreshore heritage cottages; and retention of the Foreshore Building Line to protect the vital harbour foreshore nature corridor.

WEPA is responding to the call for feedback from Sydney Coastal Councils Group, sharing our concerns and aspirations for a diverse and resilient Harbour ecosystem. A healthy natural environment enhances the physical and emotional wellbeing of the community and is essential for the survival of vulnerable wildlife struggling with the daily threats presented by our urban environment, including pesticides, invasive species, vehicles, tree loss, urban heat, and the broader impacts of climate change. Additionally, marine life faces the threat of mining activity, water pollution, speeding motor craft, unsustainable fishing practices and habitat destruction by anchors, fixed moorings, and inappropriate development.

In July 2022 Australia formally committed to protecting 30% of marine territory by 2030. While around 40% of the NSW marine estate is classified as 'Marine Park', this provides inadequate protection for life within the zone, often permitting fishing, mooring, or anchoring, which damage the harbour floor and seagrass beds and diminish the diversity of fundamental microorganisms, algae and higher levels of marine life. 'No take' Aquatic Reserves are scientifically proven to provide the optimal biodiversity benefit. It is concerning that less than 0.25% of the total marine estate is 'Aquatic Reserve' and less than 0.1% is classified as a 'no-take' Aquatic Reserve (NPA NSW). The rich biodiversity within Manly's Cabbage Tree Bay Aquatic Reserve is testament to the benefits of complete protection with a huge diversity of life and habitats making it an iconic Sydney destination. Recreational users also make a significant contribution to the local economy and fishers are rewarded by fish stock 'spill'.

It has been over 23 years since any new areas have been offered this form of protection in NSW and WEPA urges the government to secure a larger area, with increased connectivity across diverse marine environments for the greatest benefit. We support [Wyargine Aquatic Friends](#) efforts to attain complete protection for the area from Balmoral to Chinamans Beach in Mosman, which currently lacks the species diversity of Cabbage Tree Bay. This will protect the harbour floor, the vital foundation of a healthy ecosystem. It will also benefit the large population of swimmers, by ensuring that fishing burley is not attracting sharks into the immediate vicinity or polluting the waters.

In addition to the need for 'no take' Aquatic Reserves that provide genuine environmental protection, there are a number of threats currently impacting Outer Harbour ecosystems that WEPA would like to see mitigated. We are calling for better management of recreational fishing; motorised and small watercraft; and pollution.

1. Improved regulation of recreational fishing

Studies have proven the negative impact of recreational line fishing, spearfishing, and invertebrate collection on marine biodiversity. WEPA members have seen evidence of this around Sydney Harbour, reporting:

- Fish discarded with hooks attached - fishing tackle can cause severe, often lethal internal injuries to our local sea eagles and other water birds.
- A cormorant being hooked by a fisherman - a likely death sentence as it impeded the ability to fly and dry.
- Kayakers pulling in over 50 metres of discarded fishing line which poses a serious entanglement threat to aquatic life.
- Spearfishing adjacent to penguin habitat (and swimmers) in Collins Beach, a 'protected' Manly Bay area.

The explosion of #FishTok and an increased interest in fishing by all ages has positive social benefits, but unfortunately has led to some undesirable, unsustainable impacts on marine life. In addition to calling for more 'no-take' Aquatic Reserve territory, WEPA recommends better regulation and education -

- Consideration of seasonal or temporary bans for specific areas to allow for marine life recovery.
- A total ban on spear fishing in the Outer Harbour region given the current risk to swimmers and inability to effectively monitor compliance.
- Complete prohibition of all fishing around significant wildlife reserves and nesting areas for threatened species. There should be connectivity across sites, as currently the disjointed nature of protection is confusing and makes compliance hard to manage e.g. little penguins zones along the Manly harbour foreshore.
- Increased education and ranger monitoring to stop irresponsible and non-compliant behaviour.
- An education campaign should clearly explain the rules for sustainable fishing (including locations, practices, waste disposal, protections for marine birds and other wildlife). This should incorporate a dedicated program for new citizens who may be accustomed to a 'free for all' approach to fishing and invertebrate collection. As part of the program, the community should be encouraged to foster compliance amongst fellow fishers, for the benefit of marine ecosystems and the long-term sustainability of their hobby.
- Many popular fishing locations have insufficient waste collection. Provide funding for improved ranger support and upgraded waste facilities, including recycling capability.

Fewer permissible fishing locations with better waste facilities will help reduce the pollution load on the harbour, better protect other wildlife, support more effective monitoring and increase levels of compliance.

2. Improved watercraft management

- **‘No wash’ zoning protection:** All harbour inlets and bays should be zoned ‘no wash’ (less than 4 knots). The wash from speeding boats in Middle Harbour erodes the vulnerable sandstone foreshore and precious indigenous heritage sites, such as the Middle Harbour fish traps. ‘No wash’ zoning would also help to protect seagrass beds, which provide critical habitat for aquatic life. They are the foundation for healthy biodiversity and contribute ecologically by purifying water and storing carbon. These have noticeably diminished around the Scotts Creek inlet of Sugarloaf Bay, where large craft regularly get lodged on a low tide sandbank, damaging the seagrass ecosystem as they attempt to dislodge. Sea turtles and penguins that inhabit the harbour will also be better protected from potentially lethal strikes.
- **Protection for small recreational users:** Large speeding craft also present a hazard to other low impact harbour users like kayakers who have reported feeling threatened by excessive wake and inattentive drivers. ‘No wash’ zoning in all bays will help mitigate this and avoid the confusion created by different speed rules across Sydney’s bays. Consideration should also be given to other regulatory controls over large craft. Like fishing, an interest in boating was accelerated during Covid and numbers have boomed across the harbour. As Sydney’s population continues to grow are large craft being adequately managed? Is there a sustainability threshold that sets a limit to the number/size of craft to ensure that Sydney harbour is healthy and safe for other recreational users and aquatic life?
- **Minimise anchoring damage:** Prohibit anchoring in sensitive areas e.g. seagrass beds. Implement a program to replace traditional heavy chain moorings, which damage the harbour floor, seagrass beds and coral with new environmentally friendly mooring systems.
- **Manage small watercraft impact on foreshore:** Unused and abandoned small craft around the Outer Harbour foreshore are a visual and physical pollution issue. WEPA recommends mandatory registration and removal of unregistered craft. Specific storage and access sites should be established with environmentally appropriate systems to prevent further foreshore damage and microplastic pollution. The locations, design and materials must be thoroughly assessed to mitigate negative environmental impacts.

3. Pollution mitigation issues and recommended action

- **Stormwater pollution management:** Pollution traps and maintenance systems should be assessed and upgraded if inadequate. Major rain events have become a frequent

occurrence in Sydney and traps must be regularly maintained to minimise pollution entering the harbour.

- **Microplastic pollution:** There is a growing body of evidence about the impacts of [microplastics](#) on humans, wildlife, and the environment. A recent [AUSMAP report](#) included testing results for Clive Park, Northbridge, which was listed as 'moderate' (129 microplastic particles/sq. metre), based on sampling conducted in November 2018. Given the overall harbour has seen a 3-fold increase in microplastics in 2022-2025, there should be further testing at this site and other key locations in our catchment and increased mitigation efforts. More recently, the NSW EPA [Broadscale Microplastic Assessment](#) (BMA) found that 38% of estuaries tested had high/very high levels of microplastic contamination. Middle Harbour Creek was included in this study and, as it feeds into the Willoughby catchment, we are concerned that the levels of microplastic contamination were 'very high'. Data should be collected regularly, made publicly available on Council websites, and integrated into relevant reports and planning.
- **Synthetic turf action:** The BMA report found 6% of microplastics in the Hawkesbury/Sydney region were artificial turf fragments and an alarming 25% of the 'very high' particles in Middle Harbour Creek. As concerned citizens continue to battle against the installation of this harmful material in public and private spaces, Councils must take note and act. This is a serious environmental, public health and potential litigation issue. Existing fields should incorporate best practice management systems to capture plastic fibre and crumb run off. End of life upgrade opportunities, future fields, and other public spaces should prioritise natural turf and non-plastic, sustainable materials. Homeowners, schools, and businesses should be educated about health and environmental harms of synthetic turf.
- **Stronger foreshore development controls:**
 - Mandatory enforcement of more stringent planning controls for foreshore developments is necessary to prevent pollution escaping into the harbour, as well protecting public access for our harbour users. The Castlecrag foreshore is currently being damaged by illegal building spill making its way into the harbour. Pollution and excessive foreshore development also endangers local mangroves. All parties involved in foreshore development must be made aware of regulations. Bushland-adjacent sites must be better monitored and penalties for illegal activity must be sufficient to deter affluent waterfront homeowners.
 - A connected foreshore corridor must be maintained, for wildlife protection and visual amenity of the broader public. This is being lost as recent developments tend to supersize homes and downsize landscaping.
 - The NSW Labor Government has opened the door to higher density across Sydney. Impervious surface area will increase, resulting in greater stormwater run-off into the harbour. A study by Macquarie University measured the change already occurring across Willoughby prior to the new development laws (DAs & CDCs 2012-22) – house size +45%; backyards -22%; driveways +109%. Updated landscaping controls (including driveway thresholds) must be clear, specific, and enforceable, with minimum deep soil requirements to absorb run off.

- **Improved pollution reporting and response:** Review systems in place for suspected water pollution events, including timely reporting, response, testing, remediation, adequacy of penalties, enforcement, and education. WEPA members have witnessed pollution being released on weekends when Council response might be assumed to be slower.

Sydney's Outer Harbour ecosystem is currently facing numerous environmental threats and significant changes need to be implemented to safeguard its long-term health and sustainability. Greater efforts are required by all stakeholders to support the environmental, social, and economic value of the harbour. WEPA hopes that this initiative through the Sydney Harbour Coastal Councils Group delivers a pathway to greater protections for our precious harbour foreshore and bays, and its vulnerable wildlife.