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Wednesday, 5 June 2024

Dr. Philip Haines
Chair, NSW Coastal Council
c/- Department of Climate Change, Energy, the Environment and Water
PO Box A290
Sydney South NSW 1232

Email to: coastal.council@environment.nsw.gov.au

Dear Mr Haines,

Re: Sydney Coastal Councils Group Introduction

Congratulations on your position to the NSW Coastal Council and the significant opportunity you have been given to provide an independent voice to NSW Government on coastal matters.

I would like to introduce the Sydney Coastal Councils Group (SCCG). We are a regional organisation of councils (ROC) established in 1989 to promote collaboration on issues relating to the sustainable management of Sydney's coasts and estuaries. The group currently comprises nine councils in Sydney, representing nearly 1.3 million Sydneysiders.

The SCCG is guided by its [2019-2029 Strategic Plan](#) which includes six goals:

1. People and places adapt to a changing climate and future shocks and stressors
2. Waterways and the foreshore are protected and healthier
3. Marine biodiversity is protected in the bioregion
4. The SCCG Region is comprised of sustainable, liveable and 'smart' cities
5. There is a collaborative, effective and consistent approach to coastal and estuarine management
6. SCCG is trusted and respected to make representations that reflect the values of its members.

The SCCG prides its work in advocating on behalf of its members to address impediments regarding the management of our coasts and estuaries. This involves taking an active role in:

- overseeing the development of Coastal Management Programs (CMPs) and raising issues with the NSW Coastal Council through the SCCG's quarterly CMP Leaders Meetings. These meetings involve the Secretary of the NSW Coastal Council, representatives from DCCEEW, and CMP leaders from across Sydney.
- leading the largest multi-Council CMP in the state, the [Greater Sydney Harbour CMP](#) which involved 21 councils and was chaired by Prof. Bruce Thom (whilst a member of the NSW Coastal Council)
- making submissions on behalf of our members regarding CMPs. SCCG submissions can be accessed on our web-site.



Though these roles, the SCCG has developed significant capabilities and understanding of the CMP process. Given this, we encourage you to consider the following issues raised by the SCCG and its members in previous submissions and NSW Coastal Council surveys. We understand that the NSW Coastal Council is currently developing its work program and hope that these issues will be duly considered by the Council in setting its priorities.

1. Building the capacity of Councils to enable better planning for coastal adaptation

Coastal inundation of Sydney's coastal and estuarine foreshore is a present-day problem that will only be exacerbated with projected sea level rise. This has significant implications for urban planning, asset management and long-term financial planning. Foreshore councils and their communities will bear the brunt of this problem and hence will be at the forefront in planning for coastal adaptation. Although the NSW Government is committed to updating the 2015 tidal inundation and exposure assessment, the capacity of Councils to interpret this data, and implement into relevant policies and programs in consultation with its communities is limited. A critical issue is that Councils do not have a planning framework in which to interpret the findings from this update.

The [State Disaster Mitigation Plan](#) recognises the need to build the capacity of Councils, state agencies and communities on the threat of coastal inundation with sea level rise but no details of how this will be achieved has been provided. The SCCG has developed a Positions Paper titled the [Threat of Coastal Inundation and Sea Level Rise in Sydney and Options to Address Through the Coastal Management Framework](#). This calls for the development of a coastal adaptation planning framework to build the capacity of Councils and ensure the adoption of a consistent approach across the Sydney region.

In 2023, the SCCG lodged an expression of interest to seek funding for the development of the framework through Round 2 of the Commonwealth's Disaster Ready Fund. This was unsuccessful despite having 11 Councils, three catchment groups and two state agencies in the Sydney region supporting its development. The SCCG is in the process of identifying alternative funding sources for this work and would greatly appreciate this being identified as a priority for the NSW Coastal Council.

2. Ensuring alignment of CMPs with Disaster Adaptation Planning

The *NSW Reconstruction Authority Act 2022* enables the development of localised Disaster Adaptation Plans to support the NSW Reconstruction Authority's [State Disaster Mitigation Plan](#). According to the NSW Reconstruction Authority's web-site, DAPs are intended to outline projects, strategies or actions to mitigate the impact of disasters caused by natural hazards. As some of these hazards are already being addressed through CMPs, it is unclear how DAPs will align and support CMPs.

There has been limited detail provided to councils on the development and implementation of DAPs and whether these will replicate or replace CMPs. The SCCG has raised several concerns through its submission to the Joint Select Committee on the *NSW Reconstruction Authority Act 2022*. We encourage the NSW Coastal Council to consider this submission which is available [here](#).

3. Inadequate funding for green infrastructure and stormwater management

Many of the CMPs in the Sydney region are seeking to improve water quality and swimability and will be seeking to do this through investing in green infrastructure and improving stormwater management. Although funding for this work is available through the NSW Government's Coast and Estuaries Grants Program, Council contributions are still required. Unfortunately however, local councils are already financially struggling with existing stormwater asset renewal backlogs and stretched maintenance budgets, as highlighted in the former



Division of Local Government's [Local Government Infrastructure Audit](#). The SCCG has prepared a detailed submission on these funding issues to the [NSW Parliamentary Inquiry into the Ability of Local Government to Fund Infrastructure and Services](#). The SCCG's submission is available [here](#).

An urgent issue outlined in our submission to Parliament is regarding the NSW Stormwater Management Services Charge, also known as the stormwater levy. This levy was set in 2005 and has not increased with CPI despite the cost of stormwater management increasing each year. Further details on the SCCG's issues and our position is contained in the SCCG's submission [here](#).

The SCCG is also supportive of efforts by Stormwater NSW to continue to raise this issue and calls for increasing the levy. Without adequate funding provided to Councils, it will become more challenging to meet water quality and swimability goals, which are a key initiative of the Marine Estate Management Strategy (Initiative 1). We seek the NSW Coastal Council's support to prioritise this issue.

4. Lack of State agency buy-in

Section 23 of the *Coastal Management Act 2016* requires other public authorities to have regard to CMPs to the extent that those programs are relevant to the exercise of their functions and to ensure that their own plans have regard to relevant CMPs. The SCCG has observed and experienced challenges amongst CMP leaders in engaging State agencies in CMP development.

As the Project Manager for the Greater Sydney Harbour CMP, the SCCG laboured for up to 2 years to engage individual state agencies in its development despite the clear role these agencies play in the management of Sydney Harbour and the requirement of s.23. There is also a lack of guidance from DCCEEW on how to formally engage these agencies throughout the CMP process and seek commitments to actions in a CMP. For CMPs led by an individual council, it can be overly onerous to effectively engage agency partners, let alone seek commitment and cost sharing for CMP development.

Councils and ROCs need to be better supported in obtaining State agency buy-in to the CMP process and outcomes. We recommend the establishment of generic principles with key agencies including facilitating regional level MOUs or terms of reference which could be reflected as requirements in the CM Manual. A key shortcoming of the process for CZMPs was a lack of State agency buy-in and the CMP process was intended to improve on that.

5. Release of the independent report on the Greater Sydney Harbour CMP

One of the key tasks of the previous NSW Coastal Council was to chair the Greater Sydney Harbour CMP Steering Committee. Prof. Bruce Thom was appointed to the position.

Stage 2 of the CMP was completed in 2022 and one of the outputs was an independent report by Prof. Thom to the NSW Government. This report provided a series of recommendations which called for action by the NSW Government to facilitate future stages of the CMP and address significant limitations including a lack of appropriate governance structures and funding constraints.

The SCCG strongly supports this independent report's findings and seeks your consideration of the report in the NSW Coastal Council's future planning. The recommendations remain valid and we seek your support in enabling the report's proper consideration. We also seek your support for the NSW Coastal Council to continue to have a role in the development of CMPs for Sydney Harbour.



6. Challenge of delivering multi-Council CMPs

The majority of CMPs being delivered in the Sydney region require a regional, multi-Council approach. However, these are challenged by factors such as funding to deliver catchment actions, lack of formalised governance arrangements, and working with state agencies. We have previously written to NSW Government, highlighting the lack of a formal regional governance framework for waterway health and lack of sustainable funding, with ongoing reliance on limited grant funding under the Coastal and Estuary Grants Program. See submission [here](#).

I trust the SCCG will maintain a strong working relationship with the NSW Coastal Council on matters of importance for local government and the coast in general. I would also welcome an opportunity to meet with you in person to discuss these matters in more detail. I can be contacted by email at executiveofficer@sydneycoastalcouncils.com.au

Yours sincerely,



Sarah Penny Joyce
Executive Officer



Sutherland Shire
COUNCIL



INNER WEST



WAVERLEY
COUNCIL



Bayside Council

northern
beaches
council



WILLOUGHBY
CITY COUNCIL
City of Diversity



Randwick City Council
a sense of community

