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CM046-07

Sydney Region East
NSW Department of Planning
Locked Bag No. 8
Redfern NSW 2016

Re: East Subregion: Draft Subregional Strategy

The Sydney Coastal Councils Group (SCCG) would like to take this opportunity to provide comment on the *East Subregion: Draft Subregional Strategy* (the Strategy). In making this submission the SCCG will focus on the impact of the strategy on the areas of coastal management, sustainability and natural resource management in the Sydney Coastal region.

The SCCG supports the submissions made by Botany Bay, Randwick, Waverley and Woollahra Councils on the Strategy.

The development of this strategy is an opportunity to set regional and subregional benchmarks for the delivery and reporting of activities that improve the environmental, social and economic outcomes for the Sydney region. The success of the Strategy will be greatly influenced by the institutional arrangements established to deliver its *Key Directions* and *Key Actions*. To assist with this the SCCG would like the NSW Government to clarify the processes for:

- Development of a timeframe for implementation of the strategies and more specifically actions within the strategy;
- Ongoing monitoring of implementation of the strategies; and
- The support and guidance provide to Local Government in implementing key directions and actions.

At present there is little detail as to how each of these arrangements will be meaningfully achieved. SCCG looks forward to the NSW Government providing more information on how these institutional arrangements will be achieved and monitored. The successful implementation of the institutional framework of the Strategy is essential to achieving its goals.

Of concern to the SCCG is that the Strategy sets broad objectives and actions that devolve responsibility for a number of activities directly to Local Governments within the subregion. The development of an implementation plan for the State and Local Government actions specified in the Strategy would clarify and assist in planning and implementing actions identified in the Strategy.

In making this submission SCCG will provide comments on the following sections of the strategies:

1. Environment Heritage and Resources
2. Parks, Public Places and Culture
3. Implementation and Governance.

Recommendations

To ensure the effective implementation of all subregional strategies the NSW Government clarify the processes for:

- The timeframe for implementation of the strategies and more specifically actions within the strategy;
- Ongoing monitoring of implementation of the strategies; and
- The provision of support, guidance and necessary resources to Local Government in implementing key directions and actions.

1. Environment Heritage and Resources

General Comments

The coastal zone of Sydney is under increasing pressure to meet the competing objectives of multiple stakeholders. As a result it is experiencing a number of negative environmental and social impacts due to development and recreational pressures. These pressures will continue to be compounded by a population growth in the area covered by the Strategy by up to 60% over the next 20-25 years.

Unless clear priorities and benchmarks are set for the coastal zone these pressures will continue to have a negative impact on the environmental, social and economic values of Sydney. SCCG believes there is a need to increase State Government direction on coastal management in Sydney and the East Subregion specifically.

The Strategy identifies urban development leading to pressures on a number of environmental assets and natural resources. The last impact of urban development listed is 'risk of inundation of coastal properties'. This is not necessarily just an impact on a natural resource. It is an impact of previous planning decisions. SCCG recommends that the last impact listed on page 74 under Urban Development Leading to: be amended to the impacts of urban development on beach, dune and coastal lagoon systems.

Recommendation

The last impact listed on page 74 under Urban Development Leading to: be amended to the impacts of urban development on beach, dune systems and coastal lagoon systems.

Additionally SCCG believes that the Tasman Sea, forming part of the larger Pacific Ocean should be included as a waterway necessary for consideration when addressing issues related to natural resource management and sustainable development. Of significant concern to the SCCG is that the ongoing maintenance and management of the regions beaches is not considered significant enough for the development of directions or actions from the NSW Government that assist councils in their ongoing management of the regions beaches through implementation of the *NSW Coastal Protection Act 1979* and the NSW Coastal Policy.

Recommendation

The Tasman Sea, forming part of the larger Pacific Ocean be included as a waterway necessary for consideration when addressing issues related to natural resource management and sustainable development.

Comments on specific actions and directions

The SCCG supports the metropolitan scale Actions of *E1.1 Establish environmental targets* and *E2.2 Integrate targets into decision making* outlined in the strategy. To date the Sydney Metropolitan Catchment Management Authority Catchment Action Plan has not been finalised. Therefore process for integrating targets outlined in the State Plan and Metropolitan Strategy have not been articulated and it is unclear how either of these actions will be practically implemented.

Recommendation

The NSW Government clarify process for integrating targets outlined in the State Plan, Metropolitan Strategy as well as Sydney Metropolitan and Hawkesbury Nepean Catchment Action Plans.

Pollution coming from overflows and leaks in the sewer system are a significant source of ongoing pollution to the subregions waterways. Actions *E2.1.1*, *E2.1.2* and *E2.1.3* require the consideration of stormwater impacts as well as the impacts of development at the single lot or catchment scales be considered and managed. This fails to address and define actions for sources of pollution to waterways, such as sewer overflows and leaks, in the subregion other than stormwater contaminants.

The SCCG recommends an additional action be developed requiring Sydney Water Corporation to address the impacts of persistent overflows and leaks of the sewer system to the subregions water ways.

Recommendation:

Section *E.2* contain and additional action requiring the Sydney Water Corporation to address the impacts of persistent overflows and leaks of the sewer system to the subregions water ways.

Action *E2.2.2* focuses on the provision of information and mapping relating to biodiversity. It should be noted that councils across Sydney have undertaken extensive mapping and assessment of the biodiversity within their LGA. Advice from the Department of Environment and Climate Change (DECC) and the Department of Primary Industries (DPI) to undertake this action is not required. What is required is the coordination of consistent collection and storage of this information. Based on this the SCCG recommends an action requiring the DECC and DPI to develop and implement frameworks for the consistent collection and storage of biodiversity information for the Subregion.

Recommendation

An action requiring the DECC and DPI to develop and implement frameworks for the consistent collection and storage of biodiversity information for the Subregion be included in *E2.2*

The sustainable use of water is addressed in action *E.3.2* with action *E3.2.1* requiring councils to encourage large water users to use greywater where appropriate. This action does not address the suite of actions required by both Councils and the NSW

Government to ensure sustainable use of water is addressed. Such actions include, but are not limited to further investment in water savings plans, water reuse strategies and incentives for industry investment in water savings and recycling activities.

The SCCG recommends that the following actions be added to *E3.2*:

- The Department of Water and Energy (DWE) work with councils in the subregion to implement greywater reuse projects where appropriate for domestic and private users in the subregion ;
- The DWE work collaboratively with councils and the private sector in the subregion on regional projects that promote and fund demand management and reuse options.

Recommendation

The following actions be included in *E3.2*

- The Department of Water and Energy (DWE) work with councils in the subregion to implement greywater reuse projects where appropriate for domestic and private users in the subregion.
- The DWE work collaboratively with councils and the private sector in the subregion on regional projects that promote and fund demand management and reuse

Addressing the potential impacts of climate change is a significant concern to councils and their communities across NSW. *Action E5.1 Natural Hazards including Climate Hazard*, notes that the following action should be undertaken. *5.11 Councils should consider the latest available information when planning for natural hazards including climate change in their Principle LEP*. Additionally *Action E5.2* States that State Government will monitor and share information on modelling and studies of climate change.

SCCG recognises the Council of Australian Governments (COAG) intention to develop the *Collaborative Action on Climate Change* document as well as the existence of other guidance documents such as the *National Climate Change Adaptation Framework* and *NSW Greenhouse Plan*. What is missing from all of these documents is information of a local scale that is able to be used in local planning instruments such as LEPs and a framework to ensure that this information is interpreted and applied consistently across the subregion and region.

Due to this, SCCG recommends the following action be added to *E5.1* and *E5.2*. The NSW Government as a matter of urgency work with Councils to ensure that adequate information is available at the appropriate scale for the consistent application in Environmental Planning Instruments including LEPs.

Recommendation

The following action be added to *E5.1* and *E5.2*. The NSW Government as a matter of urgency work with Councils to ensure that adequate information is available at the appropriate scale for the consistent application in Environmental Planning Instruments including LEPs.

As action *5.3.2* notes, the management of coastal hazards is an action councils undertake with the guidance of the NSW Coastal Policy as required by the *NSW Coastal Protection Act (1979)*. This action fails to note that funding, support and technical advice for councils to undertake the actions necessary to implement Coastal Zone Management Plans has significantly decreased over the last decade at a national and state level.

This has resulted in many potential beach management and protection measures identified in Coastal Zone Management Plans failing to be implemented. In recognition of this the SCCG recommends that an action requiring the NSW Government to work with councils to develop new funding opportunities for the implementation of actions defined in Coastal Zone Management Plans and day to day coastal zone management actions.

Recommendation

An action requiring the NSW Government to work with councils to develop new funding opportunities for the implementation of actions defined in Coastal Zone Management Plans and day to day coastal zone management actions be added to *E5.3.2*.

Additional to the actions and directions outlined in the Strategy, the SCCG recommends that it provide clear measurable actions for the following aspects of coastal management in the Sydney region:

- Establishing a clear set of priorities and benchmarks for integrating planning, economic growth and conservation of natural resources into coastal management for NSW;
- Addressing coastal management issues not dealt with in Catchment Action Plans or regional strategies:
- Assisting Catchment Management Authorities to manage and address coastal issues in partnership with councils and their communities; and
- Providing guidance to the Natural Resources Commission on future coastal initiatives and assist communication between the Government and coastal stakeholders in NSW.

Recommendations

- The Strategy establish clear measurable actions for the following aspects of coastal management in the Sydney region:
- Benchmarks for integrating planning, economic growth and conservation of natural resources into coastal management for NSW;
- Addressing coastal management issues not dealt with in Catchment Action Plans or regional strategies:
- Assisting Catchment Management Authorities to manage and address coastal issues; and
- Providing guidance to the Natural Resources Commission on future coastal initiatives and assist communication between the Government and coastal stakeholders in NSW.

Further, the loss of Coastcare in NSW and reduced funding by both the Commonwealth and NSW Governments in initiatives that are specifically undertaken in coastal and marine environments is a major concern to the SCCG. The NSW Government is required to take the lead in setting priorities and actions that support local coastal monitoring programs, marine species protection, coastal marine planning and capacity building.

SCCG recommends that the NSW Government outline a funding framework for Government and Non-Government initiatives that promote understanding and participation in coastal management activities. Such a framework should be integrated into state wide, regional and subregional strategies.

Recommendation

The NSW Government outline a funding framework for Government and Non-Government initiatives that promote understanding and participation in coastal management activities.

2. Parks, Public Places and Culture**General Comments**

The Strategy recognises the attractions of the Subregion yet does not adequately appreciate its significance to Metropolitan Sydney. The East Subregion has many of Sydney and NSW's most popular beaches and parks. The Strategy should adequately recognise the role the Subregion plays, and the impacts and associated costs to councils in the subregion of supporting visitation from a wider area.

The ongoing funding of the Metropolitan Greenspace Program as a mechanism for providing appropriate access to open space across Sydney is an action the SCCG supports. The SCCG is pleased that the investigation of future options for provision of funding to manage open space is an action the NSW Government will take in coordination with councils. More detail on this action is required.

Comments on specific actions and directions

While noting its support for action *F2.2.1 The Department of Planning, local government and the Department of Local Government to investigate funding options to improve existing open space*, the SCCG requests that the NSW Government provide more detail on the timeframe for this action and a process that ensures its implementation. Therefore the SCCG recommends the NSW outline the timeframe and process for ensuring action *F2.2.1* is implemented.

Recommendation

The NSW outline the timeframe and process for ensuring action *F2.2.1* is implemented.

Further the SCCG requests that the NSW Government clarify the link between the open space planning referenced in the strategy with the open space planning and management required of councils under the *Local Government Act 1993* and the *Crown Lands Act 1989*. This will ensure that any funding strategies investigated are consistent with all of Local Government legislative requirements and not based on the objectives of a specific State Government Program.

Recommendation

The NSW Government clarify the link between the open space planning referenced in the strategy with the open space planning and management required of councils under the *Local Government Act 1993* and the *Crown Lands Act 1989*.

3. Implementation and Governance

Overall the processes required for the implementation and effective governance of the strategy are unclear. As stated in the introduction the SCCG believes that the Strategy will remain unimplemented unless the following issues are addressed.

- The timeframe for implementation of the strategies and more specifically actions within the strategy;
- Ongoing monitoring of implementation of the strategies; and
- The support and guidance provided to Local Government in implementing key directions and actions.

To address this, the SCCG recommends that an implementation and governance plan should be prepared detailing how the NSW Government will ensure the Strategy is implemented efficiently and effectively. Such a plan should be developed in consultation with councils in the subregion and contain:

- Key goals/actions;
- Benchmarks;
- Accountabilities; and
- A transparent process for review and reporting

Recommendation

The NSW Government prepare an implementation plan for the Strategy in consultation with Councils. Such a plan should contain:

- Key goals/actions;
- Benchmarks;
- Accountabilities; and
- A transparent process for review and reporting

Conclusion

I trust that the information provided in this submission will receive appropriate attention when assessing submissions for the East Subregion: Draft Subregional Strategy. If you wish to clarify any matter in the submission or require further information, please contact Craig Morrison (Coastal Projects Officer) on 9246 7702 or craig@sydneycoastalcouncils.com.au

Yours sincerely



Mr Geoff Withycombe
Executive Officer