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Crown land in NSW
Department of Planning, Industry and Environment
cl.enquiries@crownland.nsw.gov.au

Your reference: SSP Crown land

Reference: 026-20 SJ

Thursday, 20 August 2020

Re: Draft State Strategic Plan – A Vision for Crown Land

To whom it may concern,

Thank you for the opportunity to comment on the draft State Strategic Plan – A Vision for Crown Land.

The Sydney Coastal Councils Group (SCCG) is a regional organisation of Councils that advances sustainable management of Sydney's urban coastal and estuarine environment. We currently comprise nine member Councils who represent 1.3 million Sydneysiders. Our key goals include that:

- People and places adapt to a changing climate and future shocks and stressors
- Waterways and the foreshore are protected and healthier and
- There is a collaborative, effective and consistent approach to coastal and estuarine management.

Vision of resilient, sustainable and prosperous communities

The SCCG strongly supports the vision embodied in the Plan for Crown land to support resilient, sustainable and prosperous communities across NSW. Greater guidance from the NSW Government should be developed to assist councils realise economic and commercial opportunities and build resilience in communities. The SCCG also commends the recognition in the Plan of the importance of expanding green space, sustainable quality of life and climate change resilience and the intent to strengthen and support evolving community connections.

Role of Local Government in building climate change resilience

We note the recognition of Crown land often being positioned at the interface between natural hazards and sensitive land uses (e.g. coasts, waterways, riverbeds and peri-urban bushland). This positioning for building climate change resilience and the important role played by Local Government should be emphasised in the Plan and linked to enabling mechanisms for Local Government as Crown land managers.

The SCCG notes the intent of the Plan to work with Local Government to simplify licensing of private jetties and wharves on Crown land whilst retaining the technical and environmental assessments. The review process should also consider climate change resilience of these structures and opportunities to provide enhanced biodiversity benefits such as through living seawalls.

Actions to mitigate climate change risk

The Plan states there will be a range of ways that Crown land can be managed to mitigate climate change risks. However, we believe the plan should present more specific actions in working with State agencies and Local Government that will mitigate climate change risk.

The Plan should address how the impacts of sea level rise will be planned for and managed and provide guidance to Crown land managers, such as Local Government to ensure adaptable responses to the dynamic risk environment for Coastal NSW going forward.

Another key example of specific actions needed to mitigate climate change risk is the management of intermittently closed and open lakes and lagoons in response to coincidence flooding and climate change impacts of ocean inundation. The Plan should make provision for the NSW Government to work proactively with agencies and Local Government regarding approaches to adaptation options such as dredging and tidal gates.

Alignment of strategy and policy

Our member councils manage areas of Crown land in coastal urban areas. The SCCG notes the objectives in the Plan to address regulatory or policy obstacles to using Crown land within council managed areas as green or open space and to engage and enable councils to make improvements that benefit the local community and the environmental values on Crown land. There is also a significant opportunity to align the Plan with other current NSW State Government strategic planning initiatives such as the Green Design Guide and contribute to the blue-green grid and the restoration of degraded land.

Greater promotion and adoption of water sensitive urban design

The SCCG considers there is more potential for water sensitive urban design (WSUD) to be adopted on Crown land parcels to manage runoff entering waterways which would contribute to improving water quality more broadly across catchments. The Plan should seek to enable Local Government Crown land managers to implement WSUD and other environmental improvement initiatives. In this regard, simplifying approvals for Local Government councils to conduct low-risk activities including construction and maintenance of water and sewer systems is highly supported.

The SCCG looks forward to facilitating engagement of its member councils in further consultation, particularly in enhancing community connections and contributing to development of the operational plan.

If you have any queries, please contact me by email at executiveofficer@sydneycoastalcouncils.com.au or by phone (0407733075).

Yours sincerely,



Sarah P Joyce
Executive Officer