



Reference: 0013-21 JM

Friday, 19 March 2021

Attn. Bruce Coates
Manager Coast, Estuaries & Flood
By email: coastal.management@environment.nsw.gov.au

Dear Bruce,

Re: Priorities in the Coastal and Estuary Management Program

Thank you for the opportunity for the Sydney Coastal Councils Group (SCCG) to participate in the consultation on future priorities for the Coastal and Estuary (C&E) Management Program, held on 10 March 2021. I write on behalf of the SCCG's member Councils with comments following the consultation session.

As you are aware, the SCCG is a regional organisation of councils, established in 1989 to promote collaboration among member councils on environmental issues relating to the sustainable management of the urban coastal and estuarine environment. The group comprises nine councils adjacent to Sydney marine and estuarine environments and associated waterways and represents nearly 1.3 million Sydneysiders.

We are guided by the [SCCG's 2019-2029 Strategic Plan](#) which includes six goals that are highly relevant to the C&E Program. These include:

- People and places adapt to a changing climate and future shocks and stressors
- Waterways and the foreshore are protected and healthier
- Marine biodiversity is protected in the bioregion.

The priorities for the C&E Management Program show careful consideration of current and future needs of councils in developing CMPs and are generally supported. However, we believe additions and amendments are needed which are detailed below.

I acknowledge your request at the consultation session to provide feedback on what DPIE should prioritise to assist councils. Our key comments in relation to both the priorities that are highly supported and gaps in the priorities under each of the five priority areas for the C&E Management Program are provided below. We have also included related comments on the Agency Response to the independent review of the C&E Program, as previously provided in our letter to the Minister of 31 July 2020.

1. Delivering Outcomes

- Survey councils on issues and needs to ensure that best available support is provided in managing CMP preparation. This should also respond to information missing in the Coastal Management Toolkit including guidelines for Coastal erosion, recession and inundation hazard assessment and Management options.
- High priority locations should be firstly determined through a transparent process of consultation with councils. The locations should also be determined on economic and



other social values which are equally as important as ecological and cultural values and relate to priority threats identified in MEMA's Threat and Risk Assessment and Strategy.

- Priorities for investment through the C&E Grant Program should not just be for high priority locations. Ensure a balance of funding for planning and implementation across all CMPs currently under development.
- Balanced consideration of priority outcomes for on-ground works for coastal management.
- Guidance on monitoring and evaluation frameworks and appropriate measurables for delivering coastal management outcomes.

2. Reviewing legislation and updating guidance

- Update the Coastal Management Toolkit with guidance on best practice estuary management and catchment management within the context of total catchment management, including flood risk management planning and drawing on the NSW Government's previous estuary management manual. The management of ICOLLS should also be integrated in the manual.
- Policy guidance on the use of triggers and thresholds for managing coastal hazards needs to be consistent across the region, especially planning for sea level rise. Support a climate change working group to align sea level rise scenarios and acceptable risk at a Sydney regional scale. This is needed to determine common objectives under multi-council CMPs.
- Update the Coastal Management Toolkit in the short to medium term. Information identified as gaps under Priority 1 Delivering outcomes will be needed for CMPs currently under development.

3. Coordination, collaboration and engagement

- Update the Coastal Management Toolkit to link to MEMS outputs that can inform CMPs. Greater clarity is needed about current MEMS initiatives of relevance to CMPs.
- Improve engagement with Aboriginal communities in coastal management. In discussion with catchment groups, this would be greatly achieved through a funded position in each of the coastal land councils.
- Greater clarity is needed on what is meant by support for local councils to build capacity to implement the risk-based framework. Developing local water quality objectives requires significant resources of councils.
- The NSW Government's risk-based framework for waterway health should be implemented to address priority threats at a catchment scale. High priority should be given to the Greater Sydney Harbour catchment where a key focus is needed on improving and maintaining waterway health.
- Review best practice governance for developing and implementing multi-council CMPs. Greater clarity is needed on respective council contributions. Issues have arisen with the legality of a single council to lead CMP development, especially to manage funding obligations across the group of councils. Such issues would equally apply to entities such as ROCs, if they were eligible for funding. This means that current multi-council CMP governance models leave councils exposed to unreasonable financial and reputational risk. Agency commitments and contributions under CMPs are also unclear and there is no clear governance framework.

4. Providing science and information

- Updated information on estuary water quality should include a review of previously prepared water quality improvement plans and reaffirming the links between catchment pollutant export modelling and estuarine ecological response modelling.
- Any monitoring, evaluation and reporting framework for estuary health should build upon the previously developed MER protocols and its substantial body of investigation.



- Implement capacity building programs for councils and the consulting industry with reference to key process and technical guidance for developing and implementing CMPs and statutory planning support for councils in coastal management.
- Establish an integrated approach to identifying and prioritising knowledge needs of all coastal management stakeholders. This should be linked to the proposal for a Coastal and Estuary Marine Knowledge Strategy and a consistent methodological approach, quality and reduced duplication.
- Priority should be given to a consistent approach to water quality monitoring to support CMP development.
- Proposals for investigations and the scope of information gathering should be developed in consultation with councils to ensure their needs are met.
- All medium and long term priorities for providing science and information are supported. Funding data collection, modelling and scientific research on a statewide basis ensures efficiencies.
- In addition to offshore beach nourishment sources and viability, clarify the environmental assessment requirements and planning approvals pathways for different sand sources and scales of beach nourishment.

5. Funding and financing

- Continue to provide 2:1 funding support to help councils prepare and implement actions from their CMPs. This is of great benefit to councils and is strongly supported.
- Ensure a balance of funding for planning and implementation across all CMPs currently under development (as stated above).
- Provide additional guidance on the application of the beneficiary pays principle and cost benefit analysis, including in relation to public v. private beneficiaries.

Finally, I add the importance of ongoing communication on the development of the initiatives outlined in the priorities for the C&E Management Program which considers and provides for every appropriate opportunity to consult and engage with stakeholders, especially coastal and estuarine councils through their ROCs. The SCCG also notes that the breadth of initiatives will require considerable resourcing to deliver within the short (12 months), medium (2 years) and long (5 years) terms. Therefore, it is important to ensure that the priorities are being delivered in an appropriate order of need at the outset and undergo periodic review, in consultation with councils.

I trust the above information is helpful feedback on the proposed priorities for the Coastal and Estuary Management Program. If you have any queries, please contact me on M.0407 733 075 or by email at executiveofficer@sydneycoastalcouncils.com.au

Yours sincerely,



Sarah Penny Joyce
Executive Officer



Sutherland Shire
COUNCIL



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