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NSW Water Strategy
Department of Planning, Industry
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Thursday, 25 March 2021

Re: Draft NSW Water Strategy

To whom it may concern,

The Sydney Coastal Councils Group (SCCG) appreciates the opportunity to comment on the draft NSW Water Strategy and the opportunity to ask questions from DPIE staff via webinar on the 15 March 2021.

The 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 identified in [SCCG's 2019-2029 Strategic Plan](#) include that:

- People and places adapt to a changing climate and future shocks and stressors
- Waterways and the foreshore are protected and healthier,
- The SCCG region is comprised of sustainable, livable and 'smart' cities
- There is a collaborative, effective and consistent approach to coastal and estuarine management.

Our primary concerns relate to integrated water cycle management (IWCM) in urban areas in New South Wales. We would like to raise the importance of the work being done to improve waterway health in the catchment through the development of Coastal Management Programs (CMP) required under the *Coastal Management Act 2016*. This includes the Greater Sydney Harbour CMP which seeks to improve and sustain the health of waterways in the catchment. Given the potential impacts of the draft Water Strategy and the future Sydney Metropolitan Water Strategy, we welcome further consultation with SCCG and our member Councils to ensure strategic alignment with CMPs and to explore opportunities to leverage and support key outcomes.

In consideration of the draft NSW Water Strategy, the SCCG provides the following responses:

Do you support the proposed vision for the draft NSW Water Strategy?

Vision: Sustainable water resources for thriving people, places and ecosystems, both now and for future generations.

Yes. It aligns with the SCCG's vision "Resilient and healthy coastal and estuarine environments that are protected, conserved and managed in a manner consistent with the principles of ecologically sustainable development" which is supported by nine member Councils in the Sydney region.

Which objectives are most important to you?

We support all of the objectives outlined below, as they align with the SCCG's [Strategic Plan](#), in particular our goal number 2 (*Waterways and the foreshore are protected and healthier*). However, given that we represent nine councils with different priorities we cannot provide a ranking.

Objectives which we support are:

- Water sources, floodplains and ecosystems protected
- Protecting public health and safety
- Liveable and vibrant towns and cities
- Cultural values respected and protected
- Orderly, fair and equitable sharing of water
- Contribute to a strong economy

Which principles are most important to you?

We support all of the principles outlined below as they align with the SCCG's [Strategic Plan](#), in particular with our goal number 1 (*People and places adapt to a changing climate and future shocks and stressors*). However, as stated above, we represent nine councils with different priorities therefore, we cannot provide a ranking.

Principles we support are:

- Healthy environments sustain social and economic outcomes
- Forward thinking to build preparedness and resilience
- Water is a limited (although recyclable) resource
- Systems thinking to optimise outcomes
- Data-enabled planning and decision-making
- Transparency and accountability to engender community trust
- Giving effect to Aboriginal rights and access to water

Which aspects of water management are most important to you and your local community?

There are ongoing issues with poor water quality of stormwater and impacts on waterway health in urban streams in Sydney catchments, particularly after rainfall events. The requirements of Councils in NSW to construct and maintain urban stormwater infrastructure are prohibitively onerous and there is insufficient financial support to achieve adequate stormwater quality. Greater support at the state level is critical.

Do you have any comments on the seven strategic priorities identified?

We support the seven priorities as they align with our Strategic Plan and many of the CMPs being developed including the Greater Sydney Harbour CMP. However, to enable these priorities to be realised we need clear leadership, greater support be given to Councils in developing CMPs and stronger partnerships need to be created between Councils, State Government, research institutions, and industry.

Maintaining water quality in the Sydney region is not only important for ecological health but also to maintain the high social and economic values waterways provide to the Sydney community. Swimming, boating and fishing are extremely popular recreational activities. We recommend greater investment and more extensive water quality monitoring as proposed under action 3.4.

Do you have any comments on any of the proposed actions identified?

There are significant barriers to the effective implementation of integrated water cycle management (IWCM) in urban areas in New South Wales. Whilst State Government controls potable water supply and wastewater management, it has limited responsibility for stormwater management which falls largely with Local Government. Regulatory reform is needed to address cross jurisdictional deficiencies for IWCM. There is no clear leadership or mandate from State Government agencies and there is little or no integration of stormwater management between state and local jurisdictions in either policy or strategic settings, with little impetus to achieve common objectives relating to stormwater quality and impacts on waterway health.

The NSW Water Strategy Implementation plan should recognise multi councils CMPs and support the delivery and further regulatory reforms be undertaken to ensure the effective coordination of responsibilities of State and Local Government for IWCM.

What actions should be prioritised for immediate implementation and how should they be implemented?

Based on the SCCG Strategic Plan and the work being done to improve waterway health in the Sydney region by our member Councils and by the SCCG through the Greater Sydney Harbour CMP, we believe the following actions should be prioritised:

- 3.1 Implement NSW Long Term Water Plans to protect and enhance ecological systems.
- 3.2 Take landscape scale action to improve river and catchment health
- 3.4 Invest in long-term and effective monitoring, evaluation, reporting and research.
- 3.5 Adopt a more intense, state-wide focus on improving water quality, and to promote improve risk management and adaptation.
- 4.1 New actions to improve and apply our understanding of climate variability and change. In particular, provide access to climate risk information for water users, councils and local water utilities (4.1 b) and partner with key stakeholders and industry to develop communities of practice for climate risk modelling (4.1 d) and ensure that the metropolitan water strategies identify options to diversify water sources and water operations to be more resilient for drought and emergency response (4.3 b).
- 4.4 Better integrate land use planning, development approvals and water management. In particular, developing new planning policies to achieve high liveability and place-based outcomes by integrating land use and water cycle management decisions (4.4 b) and identify opportunities for the planning system to support water resource health and resilience in a changing climate (4.4 c).
- 6.1 Increase resilience to changes in climate and water availability in Greater Sydney
- 6.4 continue to deliver the Safe and Secure Water Program, co-funding solutions to high priority water service risks and strategic service planning.
- 6.8 Promote and improve Integrated Water Cycle Management

Do you have any other comments on the draft NSW Water Strategy?

The SCCG has been advocating that Sydney Councils should be involved in the development of initiatives and actions identified in the Marine Estate Management Strategy (MEMS) particularly given the statutory linkages with Coastal Management Programs. We can see that the draft NSW Water Strategy Priority 4 aligns with MEMS management Initiative 3: *Planning for climate change*, and that draft NSW Water Strategy Priority 3 touches on MEMS Initiative 1: *Improve water quality* and Initiative 2: *Delivering healthy coastal habitats*. However, the SCCG believes that there should be greater consultation with SCCG and its members Councils on the draft of Greater Sydney Metropolitan Water Strategy prior to exhibition for public consultation in particular its implementation plan and funding mechanisms developed for achieving both strategies.

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

Yours sincerely,

A handwritten signature in cursive script that reads "Sarah P Joyce".

Sarah P Joyce
Executive Officer