



Reference: 023-2025-JM

Friday, 3 October 2025

Transport for NSW
231 Elizabeth Street
SYDNEY NSW 2000

By online submission

Re: NSW Maritime Infrastructure Discussion Paper

Dear Sir / Madam,

The Sydney Coastal Councils Group (SCCG) welcomes the opportunity to provide a submission on the Maritime Infrastructure Discussion Paper which outlines the progress made under the Maritime Infrastructure Plan 2019-2024 and key focus areas that will guide future investment and infrastructure delivery in NSW. In addition to the written submission, we also completed the survey.

Background

The SCCG is a regional organisation of councils (ROC) 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 in the Sydney region which together represents nearly 1.3 million residents.

We are guided by the [SCCG's 2019-2029 Strategic Plan](#) which includes six goals, with those relevant to maritime infrastructure listed below:

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. There is a collaborative, effective and consistent approach to coastal and estuarine management

The SCCG has reviewed the Discussion Paper and makes the following comments on progress and achievements under the Maritime Infrastructure Plan 2019-2024 and the focus areas for further maritime infrastructure.

Progress and achievements under the Maritime Infrastructure Plan (MIP)

The Discussion Paper outlines the progress made under the previous MIP, including efforts to improve access, enhance safety, and make better use of our waterways. It states that the MIP has focused investments on improving safe and environmentally sustainable access to NSW waterways and outlines an investment framework to support councils. However, the outcomes are not well demonstrated in the Discussion Paper.

Lack of transparency and environmental accountability in the Waterways Fund

The SCCG notes that the MIP has guided investment into critical infrastructure which has been achieved through a number of targeted programs including Boating Now, Maritime Infrastructure Stimulus Program and the Boating and Infrastructure Dredging Scheme. While these initiatives aim to deliver benefits to boaters, stakeholders, and the broader community, the Discussion Paper fails to provide clarity on how fees from boating licences and registrations collected under the Waterways Fund are allocated to projects and initiatives of the MIP.

Despite repeated references to “greatest benefit”, there is no transparent framework or data demonstrating how environmental outcomes are considered, prioritised, or funded. The absence of tangible commitments to sustainability, particularly in relation to infrastructure design, mooring management, and the handling of end-of-life vessels, is deeply concerning. An important outcome of the MIP is to *enable safe and environmentally sustainable access, use and navigation of NSW waterways*. However in the ‘Measuring Success’ section, the reference to “environmentally” has dropped off the outcome goal and there are no apparent targets for “environmentally sustainable” access. Measures of success need to include these.

We also note the lack of metrics, criteria and performance evaluation in the MIP. Achievements are listed in terms of number of projects delivered and funding spent, but there is no clear evaluation of outcomes and whether project benefits have met goals. It is also unclear if there are any data on user satisfaction, economic return, or environmental benefits or impacts.

The MIP stated that the 14 Key Investment Locations were selected based on assessment of waterway user activity, existing infrastructure and broader economic performance, including benefits to recreational and commercial boaters. However, there were no apparent criteria, weighting or methodology for how these sites were selected or how funding was distributed among them. There was also no information on the specific plans and responsibilities for the ongoing management, operation and maintenance of infrastructure assets, created through this program.

The SCCG has formally raised the issue of transparency of funding with the Minister for Transport on two occasions during 2024-25, seeking:

- Disclosure of the proportion of waterways fund revenue allocated to environmental outcomes
- Clarification on how funding decisions are made and justified
- Assurance that future schemes will embed environmental criteria as core investment drivers.

To date, no response has been received. It is also disappointing that these concerns are not addressed in the MIP.

Stakeholder feedback

We note stakeholder feedback identifies key issues for a targeted approach to prioritising maritime infrastructure investment, greater transparency, more inclusive infrastructure and a strong focus on environmental sustainability, climate resilience, and improving socio-economic outcomes.

Regardless of the framework for future maritime investment, defining measurable policy actions to address stakeholders’ climate and environmental concerns will increase engagement with and support for Transport’s maritime infrastructure programs. The investment framework outlined in the MIP states that recreational usage and tourism were important factors in selecting Key Investment Locations. Hence, protecting the marine environment that facilitates this tourism and recreational usage will allow Transport’s investments to have the greatest impact.

Focus areas for future maritime infrastructure

The Discussion Paper identifies key focus areas that will guide future investment and infrastructure delivery. We offer the following comments on the five key focus areas and the questions identified in the Discussion Paper.

1. Key investment locations

Q. What are your thoughts on the use of key investment locations as the most appropriate method to ensure maritime infrastructure is delivered where it is needed most?

Similarly to other stakeholders, the SCCG supports the targeted approach to prioritising locations for investment.

However, we would query the exclusion of Sydney Harbour and strongly support its inclusion as a priority location in the future maritime investment framework. We note under the MIP that the analytical framework to identify locations at which investment would provide the greatest benefits included recreational boating and overall economic performance, demographic trends and growth. This reasoning should afford at least equal priority of Sydney Harbour with key regional coastal ports and waterways. For example, data in the MIP shows that more than a third of moorings in NSW occur in Sydney Harbour.

2. Maritime infrastructure prioritisation and delivery

Q. Building on the MIP, the consolidation of resources into the MIDO as a single point of contact and service delivery and the opportunity to focus on more granular plans, how else can Transport improve the prioritisation and delivery of maritime infrastructure?

The SCCG is concerned by the lack of strategic approach to protecting maritime assets from climate-related threats, including sea level rise, coastal inundation and erosion and increased storm intensity. For example, during the MIP's timeframe, the SCCG had been informed by Transport that there is no formal management plan existing for Sydney Harbour, despite the agency being the owner of the Harbour's bed and banks. Furthermore, Transport has advised that it has not been required to do a climate change risk assessment for its assets in Sydney Harbour.

It is encouraging that the Discussion Paper identifies that it will prioritise maintaining and upgrading existing assets, to enhance environmental performance and strengthen resilience to climate change and severe weather events. It is stated that *"Long-term changes to coastal waterways – such as erosion and rises in sea levels – will influence the management of coastal zones and planning context for infrastructure"*. We support an approach to climate risk assessments done in collaboration with local government, through the Coastal Management Program (CMP) process and that this includes Sydney Harbour which we recommend be listed as a priority area.

Improved stakeholder engagement about sewage pump-out facilities and addressing gaps in the availability of these facilities is an important initiative for environmental management. The SCCG also supports re-invigoration of the Sydney Harbour Boating Destinations initiative which among things, aims to improve access to pump-out facilities.

3. Safe and sustainable access

Q. How can a future maritime infrastructure agenda further improve safety and environmental outcomes?

The SCCG notes the strong community support for enhancing environmental and sustainability outcomes from investment in maritime infrastructure. There is also clear interest in improving access to sewage pump-out facilities to protect the health of waterways which is already identified under Question 2.

The SCCG has strongly advocated for improved environmental outcomes from anchorage, mooring management and implementing environmentally friendly moorings (EFMs). We understand that EFM trials were due to be completed in September 2025 and would urge Transport to proactively replace public moorings with EFMs, to create additional strategically located EFM courtesy moorings to reduce inshore habitat impacts and to work with mooring contractors to adopt EFMs for private mooring installations. In particular, we seek the roll out of EFMs in Sydney Harbour as a priority.

With reference to end-of-life vessels, we note the Maritime Safety Amendment Bill was passed to amend the *Marine Safety Act 1998* which included enabling Transport to manage derelict, abandoned and unseaworthy vessels more effectively. The SCCG commends the recently revised Moorings Action Plan to address updated mooring reform priorities. The Plan will guide policy and operational changes across six core areas, with the goal of fostering sustainable, safe, and

environmentally friendly boating and mooring practices. This includes guidance for mooring apparatus such as EFMs, continued research on EFMs and effective management of end-of-life vessels, with clearer definition to enable compliance.

However, we would query why the Discussion Paper does not identify the status of the Moorings Action Plan or the important initiatives that are already underway. There is no context for the Plan within the framework of future maritime infrastructure and we emphasise its importance for inclusion.

4. Technology and data

Q. How can the use of technology and data being used to improve safe access to the water?

The SCCG commends the development of the Deckee app which provides access to safety information, including weather and conditions. The app also incorporates links to seagrass maps to guide anchoring and reduce its impacts. It is noted that other technologies are being deployed including webcam vision to improve safety and cameras for data capture on infrastructure usage. Annual surveys of stakeholders are important to inform progress and identify new issues and should be targeted across a range of stakeholders, not just recreational boaters.

We fully support furthering the potential to improve information for boaters to access marine infrastructure and exploring the feasibility of a single user-friendly platform to consolidate data and infrastructure maps. This is particularly important where utilisation is the key to successful initiatives that reduce environmental impacts of boating, including access to courtesy moorings, environmentally sustainable anchorage and locations of sewage pump-out facilities.

New technologies that offer opportunities to collect more detailed data on boat usage and behaviour, asset condition and usage which help to inform more targeted maintenance, management and investment in boating infrastructure are also fully supported. Data collection should also include other recreational water user data, contributing to understanding user conflicts which are a key threat identified in the Marine Estate Management Strategy (MEMS) and to managing the conflicts where they occur.

5. Maritime infrastructure planning and property

Q. What are the key opportunities to improve maritime infrastructure planning and property functions to further improve business confidence and support investment in maritime infrastructure and property?

The Discussion Paper acknowledges that Transport continues to collaborate with local councils through its involvement in CMPs and that CMPs are key to planning for boating infrastructure, along with requirements under the *Environment Planning and Assessment Act 1979* and *State Environmental Planning Policy (Transport and Infrastructure) 2021*.

However, in the SCCG's experience the participation of agencies including Transport in developing CMPs and identifying and collaborating over CMP actions has been inconsistent. For some CMPs, it has been problematic finding contacts and/or Transport representatives are not proactively participating in the development process and enabling engagement. Moreover, the recent audit of NSW Government's Coastal Management Framework, conducted by the Audit Office of NSW found that partnerships between state and local government to implement the framework which includes CMPs were not being facilitated. The audit identified that the expectations and accountabilities for agencies were not clearly defined to support delivery and outcomes under the framework.

The MIP states that *"during implementation of future programs, consideration will be given to relevant Coastal Management Programs, under the Coastal Management Act 2016, which are developed by councils and prioritise local actions for investment."*

The statement above is indicative of the need for a more robust statement of intent, citing a proactive partnership role for Transport in the development and implementation of CMPs and one that acknowledges the importance of collaboration with councils, with commitments to funding.

Transport should continue to strive for enhanced alignment with MEMS. There is no mention of how Transport intends to continue delivering its initiatives under MEMS which is a ten year strategy, with several years until completion in 2027. The future maritime infrastructure framework

should recognise the important contribution of Transport's programs and initiatives to the management of the marine estate and reflect these in its commitments.

6. Responding to dredging needs

Q. What are the key considerations when determining dredging priorities?

We note that Transport is committed to developing a long-term dredging program and obtaining long-term data to determine optimal dredging frequencies, volumes and priority locations. However, there is no reference in the Discussion Paper about beneficial reuse of dredged material for beach nourishment which we understand is often achieved as an outcome of dredging activities.

Moreover, whilst the ongoing accumulation of sand is acknowledged, there is no discussion about the expected increasing impacts of climate change on coastal movement of sand and the context for the long-term outlook.

The SCCG also notes that Transport proposes to investigate streamlining the approvals processes for dredging, intended to improve efficiencies and reduce delays in program delivery. These issues are shared in common with beach nourishment approvals processes. Under the NSW State Disaster Mitigation Plan, the current large-scale beach nourishment feasibility assessment which is underway includes developing guidance for councils on approvals processes for beach nourishment for the extraction of offshore sand. There are likely opportunities to align these endeavours within State Government and leverage important efficiencies and mutual benefits in managing dredging operations for both navigational and beach nourishment purposes.

7. Other general feedback

Q. Is there any additional feedback that you would like to provide on the MIP and/or how the NSW Government can improve investment in maritime infrastructure and maritime infrastructure outcomes more generally?

The MIP states that key stakeholders include recreational boaters, commercial boaters (commercial fishing and tourism operators) and the general maritime industry. Councils are not identified as a key stakeholder group. Given Councils' role in managing, maintaining and operating many maritime assets and facilities, they should be recognised as key stakeholders and actively consulted throughout the planning and implementation process. In addition, Councils' local knowledge of the operational challenges and community interests help maritime infrastructure delivery.

We note that Figure 1 has a misleading title and does not represent stakeholder groups but rather, user needs. An additional figure representing actual stakeholder groups should be included in future iterations of documents intended for planning and to be shared in the public domain.

Recommendations

With reference to each of the five focus areas, the SCCG makes the following recommendations for consideration in planning for future maritime infrastructure.

Key Investment Locations

1. Provide greater transparency to stakeholders on the rationale and nature of investment programs, the priorities for project delivery and include Sydney Harbour as a Key Investment Location.

Maritime infrastructure prioritisation and delivery

2. Prioritise investment in maintaining existing assets, ahead of new assets.
3. Adopt a more strategic and transparent approach to the prioritisation and management of assets and develop management plans that respond to climate change impacts, including sea level rise and coastal inundation.
4. Undertake climate risk assessments in collaboration with local government, through the Coastal Management Program process with priority to Sydney Harbour.
5. Provide greater transparency on how fees from boating licences and registrations are allocated under the Waterways Fund across the various Maritime projects and initiatives, including for environmental outcomes.

6. Improve focus on environmental outcomes through sewage pump-out facilities.
7. Re-invigorate the Sydney Harbour Boating Destinations initiative and facilitate environmental sustainability outcomes such as sewage management and access to environmentally friendly moorings.

Safe and sustainable access

8. Ensure that the Moorings Action Plan continues to be implemented and is afforded priority funding within the framework of future maritime infrastructure, importantly in relation to environmentally friendly moorings and end-of-life vessels.

Technology and data

9. Continue to provide readily accessible information to boaters on weather and conditions and safety information through the Deckee app or similar.
10. Explore enhancements to data collection and access to boating information, including improved access to environmental information such as sensitive habitats, available EFMs and sewage pump-outs sites.
11. Undertake regular surveys across a range of stakeholder groups, in addition to recreational boaters to inform progress of initiatives and identify new boating related issues.

Maritime infrastructure planning and property

12. Work with agencies including DCCEEW and DPHI to implement reforms in the NSW Coastal Management Framework identified by the NSW Audit Office in its recent report, demonstrating clearer intent for engagement with councils and commitments to funding initiatives through CMPs.
13. Ensure ongoing Transport commitments under the Marine Estate Management Strategy.
14. Ensure clear metrics are set to measure performance on investment and outcomes, including environmental sustainability outcomes in the future framework for maritime infrastructure investment.

Responding to dredging needs

15. Take into account the increasing impacts of climate change related coastal erosion on sand movement and sediment budget within the proposed long-term data collection for dredging.
16. Ensure that the proposed long-term dredging program takes an holistic and whole-of government approach to the management of sand, optimising opportunities for beneficial reuse of sand for beach nourishment in strategic locations with mutual outcomes for sustainable navigation and coastal protection.
17. Investigate a partnership approach to streamlining approvals processes for dredging in collaboration with other State Government agencies in relation to offshore sand extraction for beach nourishment purposes.

General

18. Clearly identify councils as a key stakeholder group and the boating stakeholder groups that are not represented in Figure 1 in the Discussion Paper and include in future documentation, accordingly.

I trust our submission will be useful for your inquiry. If you have any queries, please do not hesitate to contact me on 0407 733 075 or at sarah@sydneycoastalcouncils.com.au.

Yours sincerely



Sarah Joyce
Executive Director