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Thursday, 26 February 2026

NSW Department of Planning, Infrastructure and Housing
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2124

Dear Sir / Madam

Re: Draft Sydney Plan

The Sydney Coastal Councils Group (SCCG) welcomes the opportunity to provide a submission on the NSW Government's draft Sydney Plan. We also ask that our submission be read in conjunction with submissions from our individual [member councils](#).

1. Background

SCCG is a regional organisation of councils, established in 1989 to promote the sustainable management of Sydney's coasts and estuaries through collaboration, capacity building, advocacy and research. The group comprises nine councils which cumulatively represent nearly 1.3 million Sydneysiders.

It is guided by its [2019-2029 Strategic Plan](#) which lists goals related to resilience, waterway protection, marine biodiversity, blue-green corridors, collaborative approaches and good governance. These goals were specifically developed to align with and support the objectives and strategies given in the 2018 [Greater Sydney Regional Plan – A Metropolis of Three Cities](#) (2018 Plan).

Given this, our submission initially compares the 2018 Plan with the draft Sydney Plan within the context of coastal and waterway management. We then provide more detailed comments and recommendations on the following responses given in the draft Sydney Plan:

- Response 7 – Grow and connect public open space
- Response 9 – Minimise the impact of natural hazards to communities
- Response 12 – Protect and enhance the natural environment

2. Comparison with the 2018 Greater Sydney Regional Plan – A Metropolis of Three Cities

2.1 Overview

SCCG appreciates that the draft Sydney Plan is part of a new approach to strategic planning that aims to reduce duplication across the planning system, better align housing, jobs and infrastructure planning, and support councils with clearer direction. While these goals are commendable and supported, we query how effective the draft Sydney Plan would be in achieving these goals, particularly when compared to the 2018 Plan.

SCCG found the 2018 Plan to be a holistic, visionary and well-detailed strategic plan, balancing social, economic and environmental goals. In contrast, the draft Sydney Plan replaces the previous long-term 40-year vision for Sydney espoused in the 2018 plan with a shorter-term (20 year) growth plan for housing and jobs with significantly less focus on environmental protection, particularly the protection of Sydney's highly valued coasts and waterways.

2.2 Absence of Vision

The vision for Sydney given in the 2018 Plan was developed around the concept of a metropolis of three distinct cities. SCCG found the concept of the eastern harbour city, as one of the three cities, useful given it encompassed the LGAs of all SCCG member councils and had a corresponding vision of improved community access to foreshores, waterways and the coast.

We expected this vision to be reflected in the coastal management programs (CMPs) currently being developed by SCCG and its member councils in accordance with the NSW Coastal Management Framework. This also aligned well with Sydney Water's 2021 [Eastern Sydney Regional Master Plan](#) which envisaged eastern Sydney as a water resilient harbour city.

The draft Sydney Plan eschews any regional distinction across Sydney in favour of a more consolidated view of the Sydney metropolitan area. SCCG considers that attempts to improve coastal management and waterway health in eastern Sydney cannot therefore be easily aligned with a broad direction for the whole of Sydney as currently outlined in the draft Sydney Plan.

2.3 Little Acknowledgement of Existing Urban Areas

The draft Sydney Plan focusses on land-use planning and development control as a primary means of increasing environmental protection and improving resilience. There appears to be little acknowledgement of how existing developed areas are already at risk from natural hazards as well as are contributing to environmental pressures.

For instance, the draft Plan notes under 'Priorities: Resilient' (pg. 36) that integrated water cycle management (IWCM) and water sensitive urban design (WSUD) should be pursued to support the sustainable management of urban water resources, enhance the health of urban waterways and contribute to more liveable environments. While important, it is crucial to note that incorporating IWCM and WSUD in new development is not by itself sufficient for waterway protection and liveability.

Rather, IWCM and WSUD need to be integrated throughout urban catchments in both the public and private domain. This need is evident, for example, from the analysis undertaken for the [Sydney Harbour Water Quality Improvement Plan](#) which demonstrates that incorporating WSUD in new development will make only a marginal difference to harbour water quality when compared to applying WSUD more broadly across the entire harbour catchment.

2.4 Insufficient Detail

SCCG is concerned about the reduction in detail between the 2018 Plan and draft Sydney Plan. For instance, the draft Sydney Plan does not provide the spatial detail or district scale actions previously outlined in the district plans that sat beneath the 2018 Plan.

In addition, the single page allocated to Response 12 in the draft Sydney Plan regarding protecting and enhancing the natural environment provides substantially less direction to councils when compared to the 20 pages allocated in the 2018 Plan under the theme of 'A city in its landscape'.

2.5 Monitoring, Evaluation and Reporting Not Developed

Monitoring, evaluation and reporting (MER) should form an integral part of any strategic plan and should ideally inform future iterations. SCCG is concerned that, in contrast to Objective 40 on monitoring and the proposed indicators given in the 2018 plan, an MER plan has not yet been developed for the draft Sydney Plan.

Without MER, the ability to check whether proposed actions in the draft Sydney plan are effective cannot be determined. Moreover, we suggest it would have been beneficial when preparing the draft Sydney Plan to evaluate whether the actions from the 2018 Plan were implemented and, if so, how successful the actions were.

2.6 Lack of Governance and Collaboration Mechanism

Effective catchment, coastal and waterway management at regional scales requires good governance and a high degree of collaboration across a wide range of stakeholders. To this end, [SCCG has consistently highlighted the need for improved governance and funding for catchment, coastal and waterway management.](#)

Although the draft Sydney Plan notes the importance of governance and collaboration in implementing the plan there is insufficient detail on how this will occur. This stands in contrast with the detail given in Objective 39 of the 2018 Plan on adopting a collaborative approach to city planning, and which may have provided a firmer basis to pursue improved governance.

3. **Response 7 – Grow and connect public open space**

SCCG is supportive of the intention to grow and connect public open space, particularly through the provision and connection of blue-green grid corridors as outlined in Action 7.1.

We are also supportive of the Plan's identification of the Bondi to Manly Walk as a high priority corridor. We see this as a means of enhancing community access to and along the Sydney Harbour foreshore, consistent with the aims of the [Outer Sydney Harbour Coastal Management Program](#) currently being developed by the SCCG.

The availability of suitable land within the LGAs of our member councils to create additional, major blue-green grid connections is, however, limited. As such, the draft Plan should acknowledge the importance of smaller open spaces (both public and private) and linear infrastructure (wide roads, bike paths, informal walking tracks, stormwater flow paths and open channels etc) in contributing to the creation of the blue-green grid.

One example of this is SCCG's [Walking Coastal Sydney](#) project which has led to the preparation of maps of coastal walks across member councils LGAs. Improvements to the streetscape and open spaces along these coastal walks could help enhance these routes as part of the blue-green grid.

Expanding the blue-green grid will require significant funding, collaboration across councils, coordination between councils and state agencies, and community engagement. The draft Plan should provide additional detail on the governance arrangements and funding mechanisms to allow this to occur. To this end, SCCG supports continued state investment in funding programs like the [Metropolitan Greenspace Program](#) and the [Greening our City Program](#).

4. Response 9 – Minimise the impact of natural hazards to communities

SCCG is supportive of the actions proposed for both the NSW Government and councils. These actions are however limited as there is:

- limited detail provided on the proposed guidance for considering and responding to natural hazards
- a focus on minimising risk for new development rather than existing urban areas which are already at risk
- already an adopted, business-as-usual risk management practice for councils.

To address this, we initially recommend that the Sydney Plan acknowledge the findings and actions of the NSW State Disaster Mitigation Plan (SDMP) 2024 – 2026 which presumably form the basis for the proposed NSW Government actions. We also suggest expanding on this to note additional but equally important actions in the SDMP including actions to be undertaken by state agencies other than the Department of Planning, Housing and Infrastructure.

Consistent with the findings of the SDMP, we suggest the draft Sydney Plan acknowledge that coastal erosion and coastal inundation with sea level rise will cause the greatest damage from all natural hazards by 2060, surpassing the combined damage from storms, floods and bush fires. This damage will be concentrated within existing developed foreshore areas along Sydney's open coast and estuaries.

Addressing coastal erosion and inundation will require a significant, multi-stakeholder, multi-year effort in coastal adaptation planning. Planning for coastal adaptation could be initiated through coastal management programs and/or disaster adaptation plans but will need to be integrated within existing NSW statutory, strategic and asset planning frameworks. To support this, we recommend the Sydney Plan consider an action for the NSW Government to commence preparing a DAP for Sydney (outside the Hawkesbury-Nepean DAP) as soon as possible in line with [SCCG's recommendations to the Minister for Recovery regarding disaster adaptation planning for Sydney](#), with a particular focus on coastal adaptation planning.

5. Response 12 – Protect and enhance the natural environment

SCCG is supportive of the actions regarding tree canopy and urban greening. We note though, that despite the draft Plan briefly mentioning the pressures of urbanisation on coastal and waterway health and the need to consider IWCM and WSUD, there is no supporting detail and no resultant action.

In contrast, Objective 25 of the 2018 Plan sought to ensure Sydney's coast and waterways were protected and healthier. The 2018 plan specifically acknowledged Sydney's coast and waterways as valuable natural assets that were a central part of Sydney's blue-green infrastructure and essential to the liveability and sustainability of the city. Waterway governance and ownership challenges were also highlighted.

Objective 25 was supported by four strategies that aimed to protect environmentally sensitive areas, manage public access, manage catchments and waterways through a risk-based approach, and naturalise urban waterways. Importantly, the plan stressed the need for a green infrastructure approach and more integrated catchment and waterway management.

It is recommended that the draft Sydney Plan draw from Objective 25 of the 2018 Plan to include specific actions for coastal and waterway protection. Such actions should be based on the concept of blue-green infrastructure and highlight the need for an integrated catchment and waterway management approach supported by good governance and funding. Actions should also be consistent with and build on the following relevant state-led strategies and actions:

- **NSW Water Strategy**: Action 4.4 seeks to better integrate land use planning and water management
- **Greater Sydney Water Strategy**: Priority 4 seeks to maintain and improve waterway health, invest in wastewater management, improve stormwater management and protect water for recreation
- **NSW Water Quality Governance Roadmap**: Highlights the need for integrated catchment management and improving water quality governance and monitoring. Key roadmap activities include the:
 - Integrated Catchment Management Work Program
 - Greater Sydney Water Quality Monitoring Government Framework
 - Diffuse Source Water Pollution Oversight Committee
 - Better Integrating Land-use Planning and Water Management Project
- **NSW Water Quality Objectives**: Objectives are currently being reviewed with the intention to confirm community values, water quality indicators and appropriate guideline values for NSW coastal and freshwater waterways
- **NSW Integrated Water Cycle Management Framework**: An award-winning initiative outlining a staged approach for local and state government agencies to manage the urban water cycle at site or precinct scales
- **NSW Marine Estate Management Strategy**: Management initiative 1 seeks to improve water quality and reduce litter through various activities including estuarine water quality monitoring and development of standard develop conditions for construction sediment management

6. Recommendations

To address the comments raised above, we offer the following recommendations on the draft Sydney Plan for consideration:

1. **Vision**: The Sydney Plan should introduce a long-term, compelling vision for Sydney that includes an acknowledgement of the regional differences across the city as well as the importance of Sydney's coasts and waterways to its liveability and sustainability.
2. **Management of existing urban areas**: The Sydney Plan should acknowledge that the city's established urban areas: can be greatly affected by natural hazards such as flooding and coastal inundation; can place considerable pressure on the natural environment including waterways; and must be proactively managed through an integrated catchment and waterway management approach.
3. **Connecting smaller spaces**: Response 7 should be updated to reflect the importance of connecting smaller open spaces and linear infrastructure in expanding the city's blue-green grid.
4. **Further action on disaster mitigation**: Response 9 should be expanded to note other important actions in the NSW State Disaster Mitigation Plan, acknowledge the predicted increasing severity of coastal erosion and inundation in Sydney, and commit to commencing the development of a disaster adaptation plan for Sydney that specifically addresses coastal adaptation.

5. **Protecting coasts and waterways:** Response 12 should more explicitly acknowledge the importance of Sydney's coast and waterways and commit to ensuring their protection through a green infrastructure and integrated catchment and waterway management approach, and with reference to relevant NSW Government strategies and actions.
6. **Governance, Collaboration and Monitoring:** Additional detail should be provided on the mechanisms for governance, collaboration and monitoring required to successfully implement the plan. Some of this detail could be drawn from the corresponding sections in the 2018 Plan. This should encompass potential governance and funding mechanisms for catchment and waterway management, as well as for the expansion of the city's blue-green grid.

I trust our submission will be helpful. Please don't hesitate to contact me by email at sarah@sydneycoastalcouncils.com.au if you have any queries.

Yours sincerely



Sarah Penny Joyce
Executive Director