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Reference:031-26SJ

Friday, 30 October 2026

Re: Draft NSW Coastal Management Manual – SCCG Submission

Dear Coastal Management Program Team,

Thank you for the opportunity to make a submission on the Draft NSW Coastal Management Manual. The Sydney Coastal Councils Group (SCCG) welcomes the opportunity to provide feedback on the proposed changes to the NSW Coastal Management Manual and the associated framework for the preparation, certification, implementation, monitoring and review of Coastal Management Programs (CMPs).

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 eight 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 the following goals that are highly relevant to this consultation:

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

The SCCG supports its member Councils deliver CMPs. It is also leading the development of the Outer Sydney Harbour Coastal Management Program (OSHCMP) which is a multi-council CMP involving eight councils and several NSW Government agencies. It is currently progressing through Stage 3 of the CMP process, with certification anticipated in late 2027.

General Comments

SCCG is broadly supportive of the proposed revisions to the Coastal Management Manual, noting that the intent of the proposed changes is to improve the accessibility, effectiveness and implementation of CMPs across New South Wales. We specifically support the revised Manual's emphasis on strategic planning, implementation, monitoring and adaptive management. Coastal environments are dynamic systems that cross local government boundaries and are increasingly subject to pressures associated with climate change, coastal hazards, urban development and competing community expectations. We also support recognition of multi-Council CMPs and the benefits they provide, which was significantly lacking in the 2018 Manual. However, we believe that greater guidance should be given to their development and implementation in the manual.

Governance challenges for multi-Council CMPs

The draft manual appropriately strengthens expectations for implementation, monitoring and evaluation. The SCCG supports this direction, but considers that additional guidance is essential for multi-council CMPs, where governance complexity is significantly higher than in single-council programs and funding for those developing and implementing CMPs is limited.

For multi-Council CMPs such as the OSHCMP, long-term implementation will depend on a durable, clearly defined and adequately resourced governance model. Unlike many single-council CMPs, large estuarine and harbour-wide CMPs extend across multiple local government areas and involve numerous NSW Government agencies, public authorities and other land managers with differing statutory responsibilities and funding arrangements. While the draft Manual recognises multi-Council CMPs, it provides limited guidance on how governance, decision-making and implementation should be coordinated where multiple councils, agencies and landowners share responsibility for managing identified risks. Without stronger guidance, implementation

responses may become fragmented, inconsistent or difficult to achieve despite clear identification of risks and management actions within certified CMPs.

As part of Stage 3, the OSHCMP has identified a suite of estuary-wide actions that best require leadership by a single Coordinating Body. These include:

- monitoring and evaluation across multiple councils and agencies
- development of a shared coastal adaptation planning framework to ensure consistent approaches across land managers
- filling critical information gaps to support future CMP iterations
- sharing of critical information between agencies and Councils
- coordination of inter-agency and inter-council meetings to maintain oversight of implementation, support peer learning, and resolve impediments.

The scale and complexity of these actions extend beyond the capacity of any single council. Indeed, many councils have elected to participate in multi-Council CMPs because the cost of independently preparing and implementing a CMP can be significant, specialist coastal expertise is often not available in-house, and many coastal management issues inherently cross jurisdictional boundaries. Regional partnerships allow councils to share resources, achieve consistent outcomes and address risks at an appropriate geographic scale. This is one of the key reasons why Regional Organisations of Councils and catchment groups across NSW have consistently advocated for additional support to facilitate the development and implementation of multi-Council CMPs.

At present, SCCG is the Coordinating Body for the development of the OSHCMP. However, it is uncertain whether SCCG will have the capacity, mandate or willingness to assume the long-term role required for implementation. Alternative governance options are being explored, but establishing a viable model during Stage 3 has proven challenging. As a result, governance resolution may need to occur post-certification, which is not ideal and may introduce delivery risks.

A particular challenge is that councils are often unable to provide certainty regarding long-term participation in regional organisations due to changing political, financial and organisational priorities. This creates uncertainty for harbour-wide governance arrangements and may undermine the continuity required for monitoring, reporting, adaptive management and coordinated implementation over the life of a CMP. Without a stable governance structure supported by clear state guidance, there is a risk that certified multi-Council CMPs may struggle to maintain a consistent approach to delivery and reporting across participating councils and agencies. As a result, governance resolution may need to occur post-certification, which is not ideal and may introduce delivery risks.

Recommendation:

Clarify how DCCEEW will assess governance arrangements for multi-Council CMPs, including circumstances where:

- multiple councils, agencies and public authorities share implementation responsibilities;
- key actions occur across lands managed by different organisations;
- the Coordinating Body is not a statutory entity;
- long-term governance structures are still evolving; and
- implementation responsibilities are shared across multiple councils and agencies.

The Manual should also provide guidance on governance models capable of supporting consistent reporting, monitoring, adaptive management and implementation over the full life of a CMP. Clear guidance will support councils to establish governance arrangements that are realistic, durable and certifiable.

Resourcing Multi-Council CMP Delivery and exploring Joint Organisation models

While CMP preparation may be supported through the 20% project management fee available under the Coastal & Estuaries Grants Program, this funding ceases once a CMP is certified. Multi-council CMP implementation requires an ongoing coordinating body responsible for project management, stakeholder engagement, monitoring, reporting and cross-agency collaboration—functions that cannot reasonably be absorbed by individual councils or regional organisations without dedicated resourcing. These roles will be reflected as “estuary-wide” actions within the OSHCMP, but their delivery is contingent on establishing and funding a Coordinating Body.

At present, there is a clear disconnect between the policy intent of the draft Manual and the funding arrangements available to support implementation. If the NSW Government wishes to encourage councils to pursue multi-council CMPs because of their strategic, environmental and economic benefits, there must be a corresponding commitment to fund the governance structures required to deliver them. Although this may sit outside the scope of the Manual itself, it is critical that the NSW Government addresses this shortfall through the overdue Implementation Plan and review of the Coastal & Estuaries Grants Program (both scheduled for September 2026).

Joint Organisations of Councils (JOs) present a viable governance model for multi-council CMP implementation. JOs can now be established within the Sydney metropolitan area and are eligible for Coastal & Estuaries Grants. The Office of Local Government is exploring four-year funding commitments for JOs, offering greater stability than ROCs, whose constitutions (including SCCG's) allow councils to withdraw with six months' notice. However, OLG has advised that seed funding will not be provided to establish metropolitan JOs, despite such funding being made available to regional JOs. Without seed funding, metropolitan councils are unlikely to adopt this governance model even though JOs would provide a more secure and effective structure for implementing multi-council CMPs.

Recommendation:

That the NSW Government establish a dedicated, ongoing funding mechanism to support governance, coordination and implementation of multi-council CMPs, ensuring that regional coordinating bodies have the resources required to deliver the functions identified in the draft Manual (including project management, stakeholder engagement, monitoring, reporting and cross-agency collaboration) over the full life of a certified CMP.
Consideration be given to providing seed funding for the establishment of Joint Organisations of Councils in consultation with the Office of Local Government to facilitate the implementation of multi-Council CMPs in the Sydney metro area.

Greater guidance needed on Adaptation Planning

Coastal inundation along Sydney's coastal and estuarine foreshore is already a present-day challenge and will intensify with projected sea-level rise. This has profound implications for urban planning, asset management, financial sustainability and community resilience. Foreshore councils—and their communities—will bear the brunt of these impacts and will therefore be at the forefront of coastal adaptation planning over coming decades.

Given this, it is disappointing that the updated Manual provides limited guidance on how adaptation planning should be undertaken. The NSW coastal management framework is the logical mechanism for promoting best-practice approaches to coastal adaptation, yet the revised Part B (Stage 3) offers only high-level references to adaptive management and provides very little direction on how councils should develop adaptation pathways. Other Australian jurisdictions are significantly more advanced in providing structured, practical guidance for councils undertaking this work.

SCCG considers that a state-supported coastal adaptation framework is urgently needed to ensure a consistent, evidence-based approach for foreshore councils assessing and managing risks from coastal inundation and coincident overland flooding. We recommend that such a framework be developed collaboratively between the NSW Government and SCCG, and piloted through the Outer Sydney Harbour CMP to ensure it is workable in complex, multi-agency estuarine environments.

As part of the OSHCMP, SCCG is scoping the development of a coastal adaptation planning framework. However, budget constraints mean the full framework cannot be delivered within Stage 3 and must instead be included as an 'estuary-wide' action in the CMP subject to future funding and dependent on the establishment of a Coordinating Body. SCCG believes the NSW Government should take a more active leadership role in developing and resourcing adaptation planning guidance to ensure councils can meet community expectations and statutory obligations.

Recommendation:

That the NSW Government develop a state-supported coastal adaptation planning framework to provide consistent, practical guidance for councils undertaking adaptation pathway planning. This framework could be piloted through the Outer Sydney Harbour CMP and supported with dedicated funding to ensure it can be delivered as an estuary-wide action and implemented effectively over the life of the CMP.

Building the Capacity of State Agencies – guidance needed in the manual

The development of the OSHCMP has demonstrated that a major barrier to effective multi-agency participation is the inconsistent understanding across NSW Government agencies of the CMP process, their statutory responsibilities and the opportunities CMPs provide for coordinated coastal management. At present, councils, ROCs and catchment groups are routinely required to educate agencies about CMPs, identify appropriate contacts and explain expectations—work that is resource-intensive, slow and detracts from CMP delivery. This is despite CMPs being intended as a mechanism to strengthen cross-agency collaboration, improve efficiency and formalise shared responsibilities for managing coastal risks.

The draft Manual acknowledges the importance of collaboration between councils and public authorities, but it does not provide sufficient guidance on how agency capability should be supported or how the State will ensure consistent understanding across agencies. The Manual should articulate clearer expectations for agency participation, outline the role of DCCEEW in building agency capability, and provide practical tools, such as standardised guidance, role statements, and training resources to ensure agencies arrive at CMP meetings with a baseline understanding of the process. The OSHCMP has shown that structured multi-agency forums can significantly improve coordination and lead to better management outcomes for Sydney Harbour, yet the cost of establishing and facilitating these forums currently rests with councils. Given the iconic status and complexity of Sydney Harbour, and the shared responsibilities across multiple agencies, stronger state-led capacity-building is essential.

Recommendation:
That the Manual include explicit guidance on agency capability-building, including:

- clear statements of agency roles and responsibilities in CMP development and implementation
- expectations for agency participation in multi-council CMPs
- a requirement for DCCEEW to provide foundational training (including online modules) for agency staff
- a centralised directory of agency contacts to support efficient engagement

This guidance should be supported by a DCCEEW-led capacity-building program to ensure agencies are prepared to participate effectively in CMPs and to reduce the burden currently placed on councils and regional organisations.

I trust that the feedback provided above will be helpful in finalising the updated Coastal Management Manual and supporting the Implementation Plan and review of the Coastal and Estuaries Grants Program which are currently due.

If you have any queries, please contact admin@sydneycoastalcouncils.com.au

Yours sincerely,



Sarah P Joyce
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