

10 October, 2019

To whom it may concern,

RE: Georges Riverkeeper Submission – Feedback on Coast and Estuary Grants Program

Thank you for the opportunity to provide feedback on the NSW Governments Coast and Estuary Grants Program. Georges Riverkeeper would like to provide this submission in response to the letter received by the General Manager, Gail Connolly, of our host Council, Georges River Council on 20 September 2019.

Georges Riverkeeper was originally formed in 1979 by a group of residents concerned for the health of the Georges River. This quickly evolved into an organisation with Council representation that acknowledged a collective responsibility for the health of the Georges River and to work together to improve its environmental condition and ongoing management. Bayside, Campbelltown City, City of Canterbury Bankstown, Fairfield City, Georges River, and Liverpool City Councils, and Sutherland Shire and Wollondilly Shire Councils are members of Georges Riverkeeper. The aspirational goal that drives Georges Riverkeeper is to be best environmental practice for a liveable urban river.

As Georges Riverkeeper (entity name: Georges River Combined Councils Committee Inc.) we are responsible for writing, in consultation with our member Councils, the gazetted Georges River Estuary Coastal Zone Management Plan (CZMP). Georges Riverkeeper are also undertaking the transition of the CZMP to a Coastal Management Program (CMP).

Below are four main recommendations that Georges Riverkeeper would like considered when reviewing the coast and estuary grants program. These recommendations were developed with the three other Sydney catchment groups (Cooks River Alliance, Parramatta River Catchment Group and Sydney Coastal Councils Group) who are also working through the CMP process on behalf of their member Councils.

Catchments must be a key part of coastal and estuary management and available funding

It is essential that in urban catchments, recognition that actions in the catchment (freshwater) have a direct effect on water quality in the estuary and coastal areas. As an example, in the Georges River catchment, Campbelltown City Council is near the top of the catchment, but also highly urbanised in some areas, making it the first significant pollution source into the river. The Georges River and its tributaries within the Campbelltown City Council area are entirely freshwater. Actions in Campbelltown City Council affecting their waterways have a direct and significant impact on the quality of water entering the estuary and coast, therefore must be included in the CMP and be eligible for funding under the coast and estuary grants program. Further, all Councils have freshwater inputs into the estuary. Effective management of coast and estuary pollution sources from freshwater is better managed at the source in the freshwater areas, before it enters the estuary and coast.

Georges Riverkeeper strongly recommends a holistic approach to coast and estuary management, particularly in urban areas, which includes the entire catchment, (i.e. Georges River catchment) not only the estuary or open coast. Further, all Councils within the catchment must be included in the development and implementation of the CMP and therefore eligible for funding by the NSW Government through the Coast and Estuary Grants Program.

100% funding for the planning streams Stages 1-4 when across multiple councils

The current 50:50 funding ratio across multiple councils in a catchment study area is resulting in costs in excess of \$1 million in the forward plan of the scoping study. This will be incredibly difficult for Councils to fund and impossible for the catchment groups themselves to fund as well. Additionally, when councils are in more than one study area (common in urban areas) the planning costs are doubled or tripled for some Councils.

Georges Riverkeeper recommends that the funding ratio is reconsidered and changed to 100% funded by the NSW Government for the planning stages (Stages 1-4) in developing the CMPs across multiple councils.

100% funding for project management costs when across multiple councils

In the current funding arrangement, only 10% of project management costs are funded through the coast and estuary grants program, which we believe is insufficient. Most urban catchments include a number of councils (i.e. Georges Riverkeeper has 8 member Councils), which adds to the complexity of collaborating with all member Councils in developing the CMP. If project management costs were 100% funded it would ensure a more efficient and considered approach to the development of the CMP, which in turn will increase the success of implementing the actions in the CMP.

Georges Riverkeeper recommends that 100% of project management costs are funded through the coast and estuary grants by the NSW Government for the planning stages (Stages 1-4) in developing the CMPs across multiple councils.

80% funding for works in Stage 5

The current funding arrangement of 50:50 for works in Stage 5, is not enough incentive for Councils to apply for the funding, which is evident by the lack of uptake of this stream of the coast and estuary grants program. A review of the actions in CZMPs and which actions have been implemented may show that the funding ratio is a barrier.

Increasing the funding ratio to 80:20 will decrease the financial input from Councils and would provide more of an incentive to increase environmental works.

Georges Riverkeeper recommends a review of the implementation of CZMPs – actions, which actions Councils have applied for funding and associated outcomes, and which actions Councils have not applied for funding and associated lack of outcomes.

Georges Riverkeeper recommends increasing the funding ratio to 80:20, decreasing the financial burden on Councils when implementing actions in the CMP.

There are six other recommendations that, in Georges Riverkeeper's opinion, would further improve the Coast and Estuary Grants Program, they are listed below.

- Where risks are shown to be significant to the estuary and/or coast (i.e. golf courses, industrial areas), opportunities for **co-funded works on private land** could also have a dramatic effect on the health of estuaries. Open space in urban areas is limited, therefore works to improve water quality in coastal areas and estuaries must be co-funded even if the land is privately owned for the best overall outcomes.

- **Revision of the coastal manual to be more inclusive of multiple-council groups and/or catchment approaches** to developing a Coastal Management Program is needed. Georges Riverkeeper (Georges River Combined Councils' Committee Inc.) prepared and finalised the gazetted Georges River Estuary CZMP in 2013; therefore we were encouraged by the DPIE Coast and Estuary Officer to lead transition the CZMP to the CMP on behalf of our member Councils as a catchment approach. For both the CZMP and the CMP Georges Riverkeeper has had to apply for funding via our host Council – Georges River Council (previously Hurstville City Council), as we were not eligible to apply for the coast and estuary grants, since we are not a Council. If the intention in developing a CMP is to be a catchment approach involving multiple councils, this is not reflected in the funding guidelines.
- **Revision of the Coastal Manual to include estuaries as a focus**, since most of the processes are more related to open coast.
- **Implementation of the Risk-based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions at sub-catchment and catchment levels in urban areas should be 100% funded** through the NSW Government, as this framework has the opportunity to allow for better implementation of the CMP and therefore better outcomes.
- There is a need for a more streamlined process for **Councils and catchment groups to access NSW Government support** to undertake the development of the CMP. Each Council or catchment group requires data to develop the CMP, which necessitates liaising with government agencies to obtain it, with varying levels of success.
- Better regional coordination of determining **Sea Level Rise** to inform vulnerability mapping and further guidance materials on Sea Level Rise benchmarks/scenarios would ensure a consistent accepted level of risk, allowing a certain level of protection across the CMPs. This is a contentious issue, especially among Councils, therefore guidance from NSW Government would be very beneficial.
- Establishing **stronger linkages between the Coastal Management Program process and Marine Estate Management Authority/Marine Estate Management Strategy** would also be beneficial.

Again, thank you for this opportunity to comment. Please do not hesitate to contact me on 0439 629 698 or bsalt@georgesriver.nsw.gov.au should you require further explanation on any of the points within this submission.

Yours truly,

A handwritten signature in black ink that reads 'Beth Salt'.

Beth Salt

Program Manager, Georges Riverkeeper