



27 February 2026

NSW Department of Planning, Housing and Infrastructure  
14 Parramatta Square  
12 Darcy Street  
Parramatta NSW 2150

[Have Your Say Online Submission](#)

**Subject: Coastal Management Program Audit – Request for Collaborative Action**

Dear Minister,

Our four organisations, representing 22 councils across Greater Sydney, jointly coordinate multi-council Coastal Management Programs (CMPs) and deliver a wide range of initiatives focused on restoring, protecting and revitalising the region’s waterways. This collaborative work not only strengthens environmental outcomes, but also enhances the wellbeing of Sydneysiders and supports the economic, recreational and cultural opportunities that healthy urban waterways enable. Given the centrality of waterways to Sydney’s long-term resilience, liveability and prosperity, we have a strong interest in the draft ‘The Sydney Plan’ and its role in shaping urban development for the decades ahead.

Our shared submission focuses on a central concern: the draft ‘The Sydney Plan’ does not adequately address waterways, nor the essential role that integrated catchment planning plays in shaping a resilient, liveable and sustainable metropolitan region.

While we acknowledge the significant work undertaken to prepare the draft Plan, and recognise the improvements it seeks to make to Sydney’s planning framework, we have identified several key omissions and risks that require correction to ensure the Plan meets its stated intent.

**1. The absence of a dedicated waterway objective is a major strategic gap**

The current Greater Sydney Region Plan includes a standalone objective on waterways (“The coast and waterways are protected and healthier”). This framework recognises:

- waterway health as a core metropolitan planning issue
- the systemic governance challenges facing Sydney’s catchments
- the need for integrated land-use and water management

The removal of this objective represents a significant backwards step. Without explicit direction, the Plan risks undermining the “authorising environment” required for coordinated catchment management, and for aligning land-use planning with the NSW Government’s own water strategies and reforms.

We strongly recommend reinstating a dedicated Waterways Objective, updated to reflect contemporary policy needs.



## 2. The draft Plan does not address Sydney's waterway governance gaps

Sydney Water, councils and catchment groups have long recognised that waterway governance in Greater Sydney is fragmented, with responsibilities split across multiple agencies and jurisdictions. The Greater Sydney Water Strategy and the NSW Water Quality Governance Roadmap both identify this as a major barrier to improving waterway health.

The draft Sydney Plan, however:

- does not reference these existing State strategies
- does not acknowledge the governance challenges they identify
- does not build on the existing policy reform momentum

This omission will weaken integration between strategic planning, water management and natural-resource management.

## 3. Lack of references to key catchments (e.g., Wianamatta–South Creek)

The Greater Sydney Region Plan identified Wianamatta–South Creek as a defining element of Western Sydney's future, supported by a dedicated objective and actions.

Despite intensive ongoing development in this catchment, and Sydney Water's role as Regional Stormwater Authority, the draft Sydney Plan makes no reference to Wianamatta–South Creek or the strategic importance of this landscape. This is a significant strategic oversight.

## 4. Waterways are insufficiently represented within actions, responses and implementation

The draft Plan contains only two brief references to integrated water cycle management and WSUD, neither of which includes a concrete action. This contrasts sharply with existing NSW regional and metropolitan plans, each of which includes multiple waterway-related strategies.

The absence of a waterway-related action will make it impossible to evaluate whether the Plan is improving or protecting this critical part of Sydney's environment.

We recommend adding dedicated waterway actions within Response 12, as an absolute minimum.

## 5. The draft Plan is inconsistent with other NSW Government strategies and reforms

The Plan does not reference, integrate or build upon major current NSW Government initiatives, including:

- NSW Water Strategy (Action 4.4: integrate land use planning and water management)
- Greater Sydney Water Strategy
- NSW Water Quality Governance Roadmap
- Greater Sydney Natural Resource Management Plan
- Integrated Catchment Management Work Program (DCCEEW)
- NSW Integrated Water Cycle Management Framework

- Marine Estate Management Strategy
- NSW Nature Strategy (in development)

The final Sydney Plan must align with these existing strategic directions to avoid further policy fragmentation.

## 6. Blue–green grid implementation lacks a governance framework

While the draft Plan references the blue–green grid, it does not explain how implementation will occur or how it aligns with A 50-Year Vision for Greater Sydney’s Open Space and Parklands. The blue–green grid relies on coordinated cross-agency governance and catchment-scale planning, none of which is acknowledged.

## 7. The Plan must recognise the essential role of waterways in urban resilience

Waterways and catchments underpin:

- flood mitigation
- heat reduction
- biodiversity
- water quality
- active transport
- recreational access
- cultural and community identity
- climate adaptation

Yet the draft Plan does not highlight these contributions or link them to its priorities for Resilient, Connected, Productive or Liveable Sydney.

A stronger articulation of the value of waterways is essential.

## Summary of Key Recommendations

1. Reinstate a dedicated Waterways Objective, aligned with Objectives 25 and 26 from the Greater Sydney Region Plan.
2. Include waterway-specific actions, particularly within Response 12.
3. Strengthen references to IWCM, WSUD and catchment-scale planning, replacing discretionary language (“should consider”) with directive guidance.
4. Explicitly reference major NSW Government water strategies to ensure policy alignment.
5. Acknowledge Sydney’s major catchments, including Wianamatta–South Creek, and their role in shaping spatial planning.
6. Develop a governance framework for the blue–green grid, including cross-agency responsibilities.
7. Recognise and describe the importance of waterways to Sydney’s resilience, liveability and sustainability.



## Conclusion

Sydney's waterways are essential infrastructure ecologically, socially, culturally and economically. They are foundational to the resilience and prosperity of current and future communities and must be central to the metropolitan planning framework.

We encourage the NSW Department of Planning, Housing and Infrastructure to strengthen the draft Sydney Plan by embedding long-term catchment-scale vision, integrated water management, and waterway governance reform at its core.

We would welcome ongoing engagement with the Department as the Plan progresses toward finalisation.

Yours sincerely,

All four Catchment Groups

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