



Reference: 013-24

19 August 2024

NSW Reconstruction Authority  
GPO Box 5434  
SYDNEY NSW 2001

Dear Sir / Madam

**Re: Submission on the draft NSW Disaster Adaptation Plan (DAP) Guidelines**

The Sydney Coastal Councils Group (SCCG) welcomes the opportunity to provide comments to the NSW Reconstruction Authority (RA) on the [draft NSW Disaster Adaptation Plan \(DAP\) Guidelines](#).

**1. 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.

In line with Strategic Goal 1 of our [2019-2029 Strategic Plan](#), the SCCG aims to increase the resilience of the region to natural coastal hazards and climate change. Coastal management programs (CMPs) are now the primary mechanism by which SCCG and its member councils are managing coastal hazards.

The importance of managing coastal hazards has been highlighted in the NSW Reconstruction Authority's [State Disaster Mitigation Plan \(SDMP\)](#). The SDMP notes that coastal erosion and inundation will account for 50% of the total \$9.1 billion in average annual losses in the built environment predicted by 2060. This represents nearly a three-fold increase on current average annual losses, an increase that is driven primarily by the projected rise in sea level.

The SCCG has recently been project managing the [Greater Sydney Harbour CMP](#) in which coastal inundation with sea level rise has been identified as a priority threat to the harbour foreshore. Based on this work, the SCCG has developed a [position paper on the threat of coastal inundation and sea level rise in Sydney](#). This paper outlines the increasing threat of coastal inundation in Sydney and notes the varying government responses to this threat. It highlights the need for greater consistency, leadership and support from State government for coastal adaptation and ultimately calls for the development of a coastal adaptation planning framework for Sydney.

The SCCG is also working with member councils through its Sand Management Working Group to build the capacity of its members and advocate for beach nourishment, beach scraping and other sustainable sand management actions that together can help protect private property and public assets from the increasing threat of coastal erosion and sea level rise.



The SDMP recognises that although tsunamis are rare events, they could have catastrophic consequences as seen in Japan in 2011 and Indonesia in 2004. The largest tsunami to have affected the NSW coast in recent times was in 1960 when an earthquake in Chile resulted in a 1 metre tidal fluctuation at Fort Denison in Sydney Harbour. Damage to boats, wharves, jetties and beaches was observed.

Given this risk, the SCCG has previously partnered with the University of NSW on several projects to assist its member councils in managing the risk of tsunamis. This resulted in the development of [A Method For Assessing the Vulnerability of Buildings to Catastrophic \(Tsunami\) Marine Flooding](#) and the [Coastal Vulnerability to Multiple Inundation Sources Project](#).

Considering the above, the SCCG makes the following comments on the draft DAP guidelines. Please note that these comments should be read in conjunction with any comments made by our individual member councils.

## **2. Support for the NSW Reconstruction Authority to lead the staged development of DAPs including community engagement**

The SCCG supports the intention of the RA to fund and coordinate the development and implementation of DAPs. We believe the RA is more appropriate than local councils given its greater legislative weight, available resources and regional approach to the development of DAPs.

We support the proposed staged approach to preparing DAPs. This is a logical approach that follows most traditional risk management approaches.

We also recommend that the RA lead the community engagement. We support the draft guidelines recommending the need to closely involve the community, however, the draft guidelines imply that community consultation would be lead by either JOs, ROCs or Councils. Although these organisations would play a key role in facilitating community engagement, we believe that the community engagement should be lead by the RA unless funding is provided to ROCs and Councils to do this. ROCs and Councils have limited funding and capacity to deliver the community consultation required for such complex and significant regional DAPs.

## **3. ROCs should be included on regional DAP steering committees**

The SCCG supports the preparation of DAPs at the regional scale for the reasons listed on page 16 of the draft DAP guidelines. We believe this will help avoid the risk of simply duplicating actions given in CMPs or floodplain risk management studies and plans (FRMS&Ps) – a risk that could have arisen if the DAPs were to be prepared at a more local or LGA scale.

However, the draft guidelines do not make any mention of ROCs but only regional bodies such as Joint Organisations (JOs) of councils. It should be recognised that JOs do not exist in the Sydney Metropolitan region. Instead there are various ROCs established, including the SCCG. It is therefore recommended that ROCs be added to the list of committee members in Figure 2 on page 17 of the draft DAP guidelines.

## **4. Significance of Coastal Hazards in the Sydney region**

The SDMP recognises the significance of the coastal hazards in the Sydney region particularly for two of the SCCG's member Councils – Northern Beaches and Sutherland. These and other SCCG member Councils strongly support the establishment of a framework for coastal adaptation in Sydney be developed as identified in the [SCCG's Positions Paper – the threat of coastal inundation and sea level rise in Sydney and options to address through the coastal management framework](#).

Given the significance of this hazard and the importance of regional coastal adaptation planning, we recommend establishing a DAP covering Sydney's open coast and estuaries. It would also be important for ROCs like SCCG to be represented on any such regional DAP steering committee.

## **5. Further detail required on adaptation pathways assessment**

The SCCG supports the assessment of adaptation options and pathways as part of DAP Stage 3 based on options drawn from the SDMP, CMPs, FRMS&Ps, local emergency management plans, local adaptation and resilience plans, etc. This will be critical work that is likely to form the bulk of any DAP. We also believe that the complexity and resources required for this work, particularly regarding coastal adaptation planning, should not be underestimated.

We therefore suggest that this section of the DAP guidelines be expanded to acknowledge the considerable work on adaptation planning that has been undertaken at state, national and international levels and which can be referred to in undertaking DAP Stage 3. Some of this work is documented in SCCG's position paper on coastal inundation and adaptation, and includes the Federal Government's [CoastAdapt](#), NSW Government's [AdaptNSW](#), CSIRO's [Enabling Adaptation Pathways Initiative](#), Deltares' [Dynamic Adaptive Policy Pathways \(DAPP\) approach](#) and the New Zealand Government's [Coastal hazards and climate change guidance](#).

## **6. Organisational capacity to be assessed in DAP Stage 1**

Our member councils have many decades of experience in coastal management and have achieved notable success in reducing risk from coastal hazards. However, their capacity to continue to undertake best-practice coastal management is becoming increasingly constrained by factors such as ongoing cost-shifting, challenges in recruiting and retaining suitably experienced staff, rising community expectations and aversion to risk, and increasing complexity and uncertainty particularly in the face of climate change.

Council participation in the DAP process is critical for the success of the DAP. However, the capacity of councils to participate may be limited given the above factors as well as existing council workloads related to CMPs, FRMS&Ps, bushfire management, etc.

We suggest that the capacity of individual councils to participate in the DAP process be assessed during DAP Stage 1 and prior to establishing governance arrangements and identifying resources. This should be undertaken jointly by the RA and councils. The process could draw from the organisational capacity building research and assessment models developed as part of the work of the [Cooperative Research Centre for Water Sensitive Cities](#).

The results of such an assessment should initially inform the establishment of appropriate governance structures in DAP Stage 1 as well as help identify the means of building the capacity of councils to participate. Results can also help ensure that actions developed in DAP Stage 3 are aligned with the capacity of councils to implement them during DAP Stage 5.

## **7. Governance structures to be identified for DAP Stage 5**

The implementation of adaptation actions in DAP Stage 5 will undoubtedly extend over many years and require a high degree of coordination amongst responsible organisations. It is therefore recommended that appropriate governance structures for action implementation be identified, together with the necessary resourcing, during DAP Stages 3 – 4.

This might involve, for example, continuing the governance arrangements established for preparing the DAP, as shown in Figure 2 of the guidelines, or utilising existing regional bodies like ROCs. The role of existing local committees such as local emergency management committees or floodplain management committees should also be considered.

Page 17 of the draft Guidelines state that the RA will help councils and other entities in preparing implementation plans for relevant actions identified in the DAP. We believe the guidelines need to provide further details on this to clarify questions such as:

- will Councils / entities be funded to do this?
- what timeframes will be imposed?

- will there be training and support provided on how implementation plans are developed and implemented?

Page 19 states that “further guidance, tools and information will be prepared and made available to assist DAP entities in engaging with the community”. We suggest that these documents are not finalised until consultation occurs with key stakeholders such as Councils and ROCs.

## **8. Further detail needed on the relationship between DAPs, CMPs and other planning strategies**

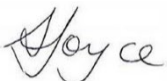
Section 37 (2) of the *NSW Reconstruction Authority Act 2022* states that the DAP guidelines may include information about how DAPs should be applied, including the relationship between DAPs and other policies and plans. To this end, we suggest as a minimum the draft DAP guidelines clarify the relationship between DAPs and CMPs. This should address issues such as whether actions under DAPs take precedence over those in CMPs in the case of any inconsistency.

It is also recommended that the draft Guidelines provides further detail on the Ministerial certification process. Page 31 identifies that a draft DAP may require Ministerial approval but there is no detail on how this would work with the certification of CMPs. The SCCG and our members are all involved in the development of CMPs and will be seeking certification for these over the next two to five years. We would like to be assured that CMP actions in a certified CMP will not be overridden by the certification of a DAP that applies to the same area.

We also suggest clarifying the relationship between state-initiated planning processes and strategies such as the NSW Climate Change Adaptation Strategy and local strategic planning statements. The process by which councils as planning authorities and service providers, as well as development proponents, should consider adaptation should be addressed in the DAPs.

I trust the above comments are helpful. If you have any queries, please do not hesitate to contact me via email at [sarah@sydneycoastalcouncils.com.au](mailto:sarah@sydneycoastalcouncils.com.au).

Yours sincerely



Sarah Joyce  
**Executive Director**