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Metropolitan Strategy  
Department of Planning  
GPO Box 39, Sydney NSW 2001

### **Metropolitan Strategy Review: Sydney Towards 2036**

The Sydney Coastal Councils Group (SCCG) would like to take this opportunity to provide input into the *Metropolitan Strategy Review: Sydney towards 2036*. The review offers an important opportunity to build on the limitations of the existing strategy as well as identify and overcome some of the strategic planning issues faced by councils in managing their built and natural environments in response to increasing population pressures and climate change.

Managing existing social, environmental and economic pressures as well as adapting to climate change presents a number of challenges for State and Local Government in relation to strategic planning and policy implementation. This submission aims to identify potential solutions that can be delivered through the review and delivery of the Metropolitan Strategy and is structured into the following chapters.

1. Introduction
  2. Consistency with other regional strategies
  3. Consistency with other NSW Government policy direction
  4. Recognising the recreational and environmental values of Sydney's coastal and estuarine environments
  5. Selecting the appropriate sea level rise adaptation options for Sydney
  6. Implementation and governance
- Appendix 1: Making Sydney climate ready consultation questions

Overall, ensuring that Sydney's prosperity and character are maintained and that its residents are resilient to climate change through the delivery of the Metropolitan Strategy will be a significant challenge that requires a whole of Government approach and community. The SCCG believes that recognising and protecting the environmental, social and economic values of Sydney's coastal and estuarine environments will make a significant contribution to overcoming these challenges.

I trust the information provided in this submission will receive the appropriate attention. If you wish to clarify any matter in this correspondence or require further information, please contact SCCG Senior Coastal Projects Officer, Craig Morrison on (02) 9246 7702 or [craig@sydneycoastalcouncils.com.au](mailto:craig@sydneycoastalcouncils.com.au).

Yours sincerely,

Clr. Wendy McMurdo  
**Chairperson**

## 1. Introduction

The coastal and estuarine environments of Sydney are under increasing pressure to meet the competing conservation, development and recreation objectives of multiple stakeholders. These pressures will only be compounded by increased population and the impacts of climate change.

The Metropolitan Strategy review highlights a number of key elements of the current Metropolitan Strategy. Two of these are:

- A target of over 550,000 new jobs for Sydney, with around half of these new jobs in Sydney's East.
- A target of 640,000 new homes by 2031, with 70% in existing areas and 30% in new release areas.

For coastal councils in Sydney to be able to accommodate the growth necessary to ensure that these targets are met while maintaining the appearance and functionality of natural assets, such as beaches, nature reserves and public open space, will require significant assistance from the NSW Government. This assistance must be delivered through consistent policy direction and guidance combined with increased funding and resources for programs such as the NSW Coastal Program and Metropolitan Greenspace Program.

## 2. Consistency with other Regional Strategies

The strategic direction in addressing the impacts of climate change provided through the NSW Metropolitan Strategy to Sydney coastal councils varies considerably compared to coastal councils outside Sydney. The NSW Metropolitan Strategy observes that councils through applying the NSW Coastal Policy and State Environmental Planning Policy No 71 – Coastal Protection provisions to Local Environment Plans are to:

*“to provide for access to coastal and foreshore environments, to ensure setbacks in areas of coastal erosion risk and address other risks of climate change.”* (Page 211 City of Cities – A plan for Sydney's Future)

In comparison the Far North Coast Regional Strategy notes that:

*“The Department of Planning will support the capacity of local councils and the catchment management authority to plan for climate change.”* (Page 23 Far North Coast Regional Strategy)

*“In order to manage the risks associated with climate change, councils will undertake investigations of lands with the potential to be affected by sea level rise and inundation to ensure that risks to public and private assets are minimised.”* (Page 23 Far North Coast Regional Strategy)

*“Local environmental plans will make provision for adequate setbacks in areas at risk from coastal erosion and/or ocean based inundation in accordance with Coastal Zone Management Plans. Until these plans are made by the Minister for Natural Resources, councils cannot zone land or approve new development or redevelopment in potential hazard areas, unless assessed within a risk assessment framework adopted by the council.”* (Page 23 Far North Coast Regional Strategy)

Further, the Draft NSW Coastal Planning Guideline provides councils broad advice as to how they can incorporate sea level rise and coastal hazard considerations into their strategic planning and development assessment activities. In Sydney, the application of the guidelines would be significantly assisted if the Metropolitan Strategy contained the kind of direction that the highlighted text from the North Coast Regional Strategy provides with respect to minimising risk and prohibiting development in areas at risk of inundation.

To provide coastal councils in Sydney with greater direction and address the inconsistency with other regional strategies the text above from the North Coast Regional Strategy should be inserted into the appropriate sections of the NSW Metropolitan Strategy. This would ensure consistent application of both regional strategies and the Draft NSW Coastal Planning Guideline throughout NSW.

### **3. Consistency with other NSW Government Policy Direction**

The Draft NSW Coastal Planning Guideline recommends a number of strategies to prohibit development or reduce land use intensity using tools such as amended land use zones, zoning objectives and principle development standards. Each of these strategies are appropriate in undeveloped areas but greater guidance needs to be given to councils with respect to prohibiting development in the highly urbanised coastal areas of Sydney.

A number of regional strategies in NSW, including the Metropolitan Strategy, propose residential and commercial development in areas that will be affected by sea level rise or flooding. Therefore, councils require guidance as to how they are expected to accommodate any proposed increases in residential or commercial development in a safe and strategic manner while being consistent with the Draft NSW Coastal Planning Guideline.

The NSW Government must ensure that its own strategic planning processes are consistent with and accommodate the principles and proposed management responses in the Draft NSW Coastal Planning Guideline. Additionally the NSW Department of Planning must review the dwelling and employment targets set in the Metropolitan and subregional strategies in light of the NSW Sea Level Rise Policy Statement and Planning Guidelines.

### **4. Recognising the recreational and environmental values of Sydney's coastal and estuarine environments**

The coastal and estuarine environments of Sydney contain some of NSW and Australia's most iconic natural and recreational assets. Beaches such as Manly and Bondi on the open coast and Balmoral in Sydney Harbour are internationally recognised. Combined with its beaches the Sydney coastal region contains a large number of highly valued National Parks and reserves which are utilised for conservation as well as passive and active recreation.

Each of these assets is utilised by both residents and visitors from within Sydney as well as other regional centers, states and countries. As a result councils are managing natural assets whose economic benefit extends well beyond the Local Government Area.

The Metropolitan Strategy and NSW Government must support the role the coastal zone of Sydney plays in promoting tourism and economic growth as well as the impacts and associated costs to councils or maintain these assets. Such support should take the form of ongoing resources for management as well as guidance and financial support in selecting and implementing the necessary adaptation options in response to climate change to preserve and enhance these values. Actions that would assist with these activities include:

- Ongoing funding for the Metropolitan Greenspace Program as a mechanism for providing appropriate access to open space across Sydney; and
- An investigation into the adaptation options and associated costs of building the resilience of public lands, including beaches, in Sydney to climate change.

### **5. Selecting the appropriate sea level rise adaptation options for Sydney**

Managing the impacts of climate change including sea level rise in Sydney will be a costly activity. The *Climate Change Risks to Australia's Coast – A First Pass National Assessment* report released by the Australian Government in 2009 notes that a sea level rise of just 20 centimetres together with a 1 in 50 year storm surge could push the coastline at Narrabeen back by 110 metres and cause local damage of around \$230 million. This report also highlights that a number of other locations in Sydney are highly vulnerable to the impacts of sea level rise.

Traditionally there are three management responses to coastal erosion and recession, retreat, accommodation or protection, which can be applied singularly or collectively. The choice of strategy will depend on the circumstances of the threat, vulnerability and capacity of those affected to respond. Community attitudes and willingness to pay must also be taken into account.

To assist in developing a long term strategy for Sydney in response to sea level rise the NSW Government must work with councils to consult with residents on their desired adaptation responses. Once the desired adaptation response has been identified the associated costs and timeframes for implementation can be established.

## **6. Implementation and Governance**

Coordination amongst all three spheres of Government and consistent decision making are required to ensure that the intent and goals of the Metropolitan Strategy are translated into positive outcomes for the residents of Sydney. The establishment of a coordinated group of agencies and councils to guide implementation will be important in establishing the necessary governance structures.

Additionally, an implementation plan detailing how the NSW Government will ensure the Strategy is implemented efficiently and effectively is required. Such a plan should be developed in consultation with councils in the Sydney and contain:

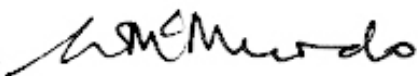
- Benchmarks;
- Key goals/actions;
- The timeframe for implementation of actions within the strategy;
- Ongoing monitoring of implementation of the strategies;
- Responsibilities and accountabilities;
- The support and guidance provide to Local Government in implementing key directions and actions; and
- A transparent process for review and reporting.

## **Conclusion**

Meaningful implementation of the Metropolitan Strategy will require commitment and leadership from the NSW Government. The SCCG looks forward to seeing responses to the issues and recommendations raised in this submission. The Group is eager to facilitate ongoing dialogue with the NSW Government on the strategic planning issues and needs of coastal councils in response to increased population growth and climate change.

I trust the information provided in this submission will receive the appropriate attention. If you wish to clarify any matter in this correspondence or require further information, please contact SCCG Senior Coastal Projects Officer, Craig Morrison on (02) 9246 7702 or [craig@sydneycoastalcouncils.com.au](mailto:craig@sydneycoastalcouncils.com.au).

Yours sincerely,



Clr. Wendy McMurdo  
**Chairperson**

## **Appendix 1: Making Sydney climate ready consultation questions**

### **What land use responses will help Sydney adapt to climate change?**

Adapting to the impacts of climate change through land use planning will be achieved through two actions:

1. Preventing inappropriate land uses in vulnerable areas
2. Minimising the impacts on existing built assets and vulnerable residents

#### **Preventing inappropriate land uses in vulnerable areas**

The Draft NSW Coastal Planning Guideline recommends a number of strategies to prohibit development or reduce land use intensity using tools such as amended land use zones, zoning objectives and principle development standards. Each of these strategies are appropriate in undeveloped areas but greater guidance needs to be given to councils with respect to prohibiting development in highly urbanised coastal areas, where existing use rights issues will arise.

Councils with areas affected by natural hazards, such as sea level rise, should be provided with additional legislative tools and support to limit or reduce the impacts of sea level rise on existing or proposed development. These tools must carry the required legislative weight and be applied consistently to reduce the potential for litigation when they are utilised. In the absence of such guidance the emphasis will be protecting vulnerable properties rather than preventing their development.

#### **Minimising the impacts of existing built assets and vulnerable residents**

The responsibility for addressing the impacts of climate change on existing or proposed development will primarily rest with councils. With reference to sea level rise this appears to rely on Council Local Environment Plans to implement planning controls relating to the Sea Level Rise Policy Statement and Draft NSW Coastal Planning Guidelines.

For councils to be able to effectively minimise the impacts of climate change on existing built assets and residents will require ongoing assistance in managing development in areas where natural hazards such as bushfire, coastal inundation and flooding occur and are likely to be exacerbated by climate change. Additionally, greater strategic guidance must be given to councils in minimizing the social impacts of extreme weather conditions such as heat on vulnerable residents. Such assistance should take the form of:

- Model Development Control Plan controls
- Building Guidelines
- Emergency Management Plans and Procedures

### **How can the planning system help Sydney adapt to the impacts of climate change?**

Additional to the strategic planning and development assessment issues raised above, the planning system can help Sydney adapt to the impacts of climate change through two activities:

- Data collection and provision:
- Consistency in policy direction and implementation

#### **Data collection and provision**

The NSW Government must invest greater resources in identifying the areas and communities of Sydney vulnerable to the impacts of climate change such as extreme heat, flooding, coastal inundation and sea level rise as well as bushfire. To achieve this, the following actions should be undertaken:

1. The provision to Councils of the necessary modeling and hazard information to allow consistent consideration of the impacts of natural hazards such as extreme heat, flooding, coastal inundation and sea level rise as well as bushfire.
2. Ensuring the continued provision of policy guidance and technical expertise by the NSW Government to Councils on the management of natural hazards likely to be exacerbated by climate change and assets at risk.

### **Consistency in policy direction and implementation**

All spheres of Government must respond to climate change in a coordinated and consistent manner. With respect to sea level rise, the Draft NSW Coastal Planning Guideline recommends a number of strategies to prohibit development or reduce land use intensity that will be implemented through the Local Environment Plans of councils.

However, Part 3A and Part 5 Assessments under the *Environmental Planning and Assessment Act* don't need to refer to Council Local Environment Plans. Additionally, the State Environmental Planning Policies for Development Standards, Infrastructure, Major Development, Affordable Rental Housing and Exempt and Complying Development (incorporating the NSW Housing Code) all allow development without council consent within the coastal zone.

This could effectively intensify development without councils having a role in limiting development in high risk areas. To address this:

- All NSW Government Departments and Agencies must ensure they apply the stated principles of Sea Level Rise Policy Statement and Planning Guidelines when undertaking development assessment activities for proposals potentially impacted by sea level rise through the *Environmental Planning and Assessment Act* and relevant State Environmental Planning Policies.
- With specific reference to State Environmental Planning Policy 1 - Development Standards. As this Policy (implemented through cl 4.6 in the Standard LEP) allows for development standards to be waived. Development in immediate risk zones should be exempt from the application of State Environmental Planning Policy 1 - Development Standards to reduce the possibility of intensification in these areas

### **How can planning in Sydney be improved to boost water, fuel, energy and waste efficiency?**

The application of planning to boost water, fuel, energy and waste efficiency will require a combination of regulation and incentives that cover new and existing building stock as well as owners and renters. Improvements in water and energy efficiency in particular will contribute to mitigating and adapting to climate change. Activities to achieve such efficiencies should include:

- Strengthening the BASIX sustainability index to extend its operation to commercial and industrial sites, rather than its current application to residential dwellings only.
- The establishment of mandatory sustainability requirements for retrofitting of existing buildings (in particular commercial and industrial). This is particularly important given the emphasis placed on urban renewal within the Discussion Paper, meaning that future housing supply may come from existing buildings and therefore not be captured by BASIX.
- Changes to residential tenancy laws that insert sustainability clauses into residential leases, and laws to require mandatory disclosure of the energy and water efficiency of properties for sale and for rent.
- The development of a BASIX indicator of the resilience of buildings to the impacts of climate change

### **How can we bring more green and open spaces into our communities?**

Maintaining green and open space will be critical for both the wellbeing of communities as well as conserving biodiversity in the Sydney region. For example the conservation of existing areas of native bushland serves the purpose of reducing urban heat island impacts along with

maintaining species diversity and ecosystem function. Additionally, conserving agricultural land in the Sydney basin will assist Sydney to adapt to climate change as it will provide food security in the future, when changing climate conditions and the expense and greenhouse gas emissions associated with transporting food from more distant locations make it increasingly important to source food locally.

Within the Sydney Coastal Region the opportunities to create more green and open space are limited. Therefore it is important that existing green and open space is maintained and remediated. The NSW Government must ensure that remaining natural areas or open space are not cleared so that housing and employment targets can be met. Actions that would assist in achieving this include:

- Stronger planning provision for the protection of native vegetation in urban areas.
- Increased funding for the maintenance of regionally significant areas of open space.