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31 August 2023

The Hon. Penny Sharpe MLC
Minister for the Environment
52 Martin Place
SYDNEY NSW 2000

Dear Minister

Re: Request for State Government leadership to address the threat of coastal inundation and sea level rise in Sydney

The purpose of this letter is to seek your advice on options to progress the assessment of coastal inundation and sea-level rise by local councils in the Sydney region. The Sydney Coastal Councils Group (SCCG) and its member councils are currently preparing coastal management programs (CMPs) which seek to address this threat. **Two options** are proposed, and we are seeking direction from you as to the best way to proceed to address the urgent needs of these councils in fulfilling their obligations under the *Coastal Management Act 2016*.

BACKGROUND

The Threat of Coastal Inundation and Sea Level Rise

Climate change and how we adapt are some of the most pressing issues of our time. The SCCG is committed to act on climate change in line with its goals identified in its [2019-2029 Strategic Plan](#), in particular Goal 1 which seeks to help people and places adapt to the future shocks and stressors from a changing climate, including from sea level rise.

Coastal inundation with sea level rise has been identified as a priority threat in all of the CMPs being developed by SCCG members including the [Greater Sydney Harbour Coastal Management Program](#) (CMP). However, there are significant challenges for councils in how they plan to adapt to this threat. In response, the SCCG has prepared the attached positions paper which details our concerns about coastal inundation, the enormous economic and social cost of inaction and our recommendation for a coastal adaptation planning framework to be developed.

It should be noted that our positions paper supports and expands on the work of Prof. Bruce Thom, former Chair of the Greater Sydney Harbour CMP Project Management Committee, who recommended to the previous government last year that, *'the Department of Planning and Environment establish a science-led climate change adaptation team for Greater Sydney Harbour tasked with developing an integrated catchment to estuary climate change adaptation pathways approach'*.



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Consideration of coastal adaptation requires a collaborative approach

As our member councils have indicated, coastal adaptation has significant implications for urban planning, asset management, legal risk, long-term financial planning and overall community well-being that cannot be considered in isolation or by any single council acting alone. Moreover, development of the Greater Sydney Harbour CMP has highlighted the complex challenges in managing a multi-year project across multiple councils with currently limited capacity for adaptation.

Accordingly, we are calling for greater leadership and support from the NSW Government to improve planning for coastal adaptation at the local level. We have identified the following two options by which this could be provided.

OPTIONS

Option 1 – NSW Government to lead the development of a coastal adaptation planning framework

We believe that the NSW Government should take the lead on coastal adaptation given the implications for councils' obligations under the integrated planning and reporting (IP&R) framework and concomitant need for a consistent state-wide approach to coastal adaptation.

A state-led approach is consistent with the *Coastal Management Act 2016* where the NSW Government, through its NSW Coastal Management Manual, is responsible for providing guidance to councils on the integration of CMPs within their IP&R frameworks. The proposed coastal adaptation planning framework also provides a broader context in which to embed the Department of Planning and Environment's (DPE) current work on adaptation triggers and thresholds.

The application of the framework to coastal vulnerability areas will help meet one of the objectives of the *Coastal Management Act 2016*, specifically, 'to mitigate current and future risk from coastal hazards by taking into account the effects of coastal processes and climate change'. It also provides a context for foreshore councils to apply the development controls for coastal vulnerability areas given in the State Environmental Planning Policy (Resilience and Hazards) 2021.

Ultimately, we would envisage a state-led framework could be developed and issued as an addendum guideline to the NSW Coastal Management Manual. SCCG would be happy to work with the NSW Government to use Greater Sydney Harbour as a pilot for the development of the framework that can be subsequently rolled out state-wide.

Option 2 – NSW Government supports SCCG to develop a coastal adaptation planning framework for the Sydney region

If the NSW Government declines to take Option 1, and given the urgency of the situation, SCCG would propose instead to develop the framework for the Sydney region. In doing so, SCCG would require NSW Government support in terms of grant funding, technical input, coordination of state agencies, and state agency participation within a collaborative project governance structure. We see an enhanced role for DPE's Greater Sydney Branch in this regard.

We have consistently highlighted that funding constraints imposed by the NSW Coastal and Estuary Grants Program, specifically the 20% cap on costs for project management and the lack of state agency financial contributions, are a significant impediment to progressing CMPs in the Sydney region in a timely manner. We believe this is an opportune time to review and update these funding arrangements such that they better reflect the significant project coordination costs required for coastal adaptation planning across numerous stakeholders.



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We are encouraged by recent discussions held with staff from DPE's Water Wetland Coasts Science Branch who are supportive of a coastal adaptation planning framework and the opportunity to provide technical support. Other state agencies such as Sydney Water and NSW EPA are also supportive of us undertaking coastal adaptation planning but are yet to provide any financial support. We seek your support to formalise these arrangements.

RECOMMENDATIONS

We respectfully recommend that you:

1. Provide the necessary direction and support to implement Option 1 to ensure coastal adaptation planning by the NSW Government is integrated, coordinated and builds the capacity of coastal councils who will be at the forefront in dealing with the threat of coastal inundation.
2. If Option 2 is chosen:
 - Write to the EPA and Sydney Water seeking financial contributions of \$30,000 each for the development of coastal inundation framework by the SCCG; and
 - Make amendments to the NSW Coastal and Estuary Grants Program guidelines to remove barriers around the 20% project management cap so that the true costs of project managing across 20 Councils and five state agencies for the Greater Sydney Harbour CMP are recognised or provide a one-off contribution to fund development of the framework.

If you have any queries, please do not hesitate to contact Ms Sarah Joyce, SCCG's Executive Officer, on 0407 733 075 or at executiveofficer@sydneycoastalcouncils.com.au.

Yours sincerely



Clr Jack Boyd
Chair



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