

SYDNEY COASTAL COUNCILS GROUP Inc.
PO Box 999, Manly NSW 1655
Email: info@sydneycoastalcouncils.com.au
Web: www.sydneycoastalcouncils.com.au
ABN: 39 638 876 538



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11 April 2024

National Adaptation Policy Office – Climate Adaption Policy
Department of Climate Change, Energy, the Environment and Water
GPO Box 3090
CANBERRA ACT 2601

Dear Sir / Madam

Re: Response to the National Adaptation Plan Issues Paper 2024

The Sydney Coastal Councils Group (SCCG) welcomes the opportunity to provide input to the development of the first National Adaptation Plan. After reviewing the National Adaptation Plan Issues Paper as well as the National Climate Risk Assessment: First Pass Assessment report and associated appendices, we are pleased to provide an overall response to the issues paper as well as responses to the specific questions raised.

Background

The SCCG is a regional organisation of councils established in 1989 to promote the sustainable management of Sydney's coasts and estuaries through collaboration, capacity building, advocacy and research. We comprise nine member councils who represent approximately 1.3 million Sydneysiders.

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

The SCCG and its member councils are currently developing coastal management programs (CMPs) in accordance with the NSW Coastal Management Framework to manage coastal hazards. We have 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](#). The position paper outlines the increasing threat of coastal inundation in Sydney but notes the varying government responses to this threat. The paper highlights a need for greater consistency, leadership and support from government for coastal adaptation and ultimately calls for the development of a coastal adaptation planning framework for Sydney.

We are also working with member councils through its Sand Management Working Group to advocate for and support beach nourishment, beach scraping and other sustainable sand management practices that together can help protect private property and public assets from the increasing threat of coastal erosion.



Sutherland Shire
COUNCIL



INNER WEST



WAVERLEY
COUNCIL



Bayside Council

northern
beaches
council



WILLOUGHBY
CITY COUNCIL
City of Diversity



Randwick City Council
a sense of community



Given this focus, the SCCG has targeted its comments towards the following two of the eight systems described in the issues paper:

- the infrastructure and built environment system
- the natural environment system.

Overall Response to Issues Paper

We commend the development of the National Adaptation Plan and generally agree with the broad elements of the plan as described in the issues paper.

We agree with the statement on page 14 that coastal communities are expected to face substantial climate impacts. We also agree that planned retreat should be considered as an adaptation option, however, we question how this can feasibly and cost-effectively be applied to foreshore development around Sydney.

You may be aware that the State Disaster Mitigation Plan released this year by the NSW Reconstruction Authority provides introductory guidance on the option of planned retreat, otherwise known as managed relocation. The plan has also committed to the development of a State policy for large-scale, multi-hazard managed relocation.

The plan notes that there are approximately 14,000 properties in NSW at risk of coastal inundation under a one metre sea level rise scenario. The current total value of these properties to which a managed relocation scheme could apply, is between \$18 and \$23 billion.

Given the substantial complexities, sensitivities and costs involved in such adaptation options, we query the statements made in Section 1.3 and reinforced by statements on pages 21 and 39, that suggest it is more efficient and appropriate for businesses and individuals to manage risks than governments. We would argue that, while coastal communities will ultimately need to agree on the course of adaptation, governments will remain in the forefront of providing the leadership and resources required for communities to adapt.

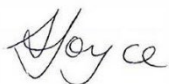
We agree with the statements on page 4 that local governments will be instrumental in adaptation. We suggest, however, that while climate change is being considered in statutory planning, local adaptation planning particularly for coastal hazards is very much in its infancy in NSW. This is because there is little federal or state government guidance or funding available to help local government in undertaking the detailed planning required for coastal adaptation.

Response to Consultation Questions

The table in **Attachment 1** gives our responses to the specific consultation questions. We have no responses to the questions in Box 7 regarding the First Nations' values and knowledge system.

I trust our submission will be helpful in developing the National Adaptation Plan. Please do not hesitate to contact me on 0407 733 075 or at executiveofficer@sydneycoastalcouncils.com.au should you have any queries.

Yours sincerely



Sarah Joyce
Executive Officer

Attachment 1: Responses to Consultation Questions

Consultation Question	SCCG Response
Box 2	
What do you think a well-adapted and resilient Australia looks like?	We believe a well-adapted and resilient Australia is one where governments and local communities have together undertaken best-practice adaptation planning and are confidently and progressively implementing adaptation actions to the point where communities become increasingly resistant to and can quickly recover from disasters when they occur.
Does the draft vision capture this? Why or why not?	We suggest the National Adaptation Plan does not need a vision, only an objective. A vision only needs to be developed for an adapted society as per the above question. Such a vision should be developed by local communities as part of local adaptation planning and should use more authentic, emotive and meaningful language.
Do you agree with the key objectives of the plan? What other suggestions do you have?	The key objectives are supported. However, we question the apparent link between private sector investment and support for vulnerable communities given incentives for private investment in such communities, which are often low socio-economic, are often lacking.
The plan will respond to the priority nationally significant risks identified in the National Climate Risk Assessment. Within those, what areas should be the Commonwealth's priority for this National Adaptation Plan and why?	We would argue for a focus on coastal adaptation. Although other hazards such as storms, floods and bushfires occur periodically and currently cause the greatest damage, the frequency of and damage from coastal erosion and inundation with sea level rise will increase in the coming decades and will significantly outweigh the damages from all other hazards. Coastal inundation with sea level rise will also be one of the more challenging hazards to adapt to and will require significant time and planning (which is still in its infancy compared to other hazards).
Box 3	
What is working well in adaptation policy governance at the national level? Are there more opportunities for collaboration, or institutional changes that will help build a more adapted Australia?	We believe there are opportunities for greater collaboration with other nations which are more advanced on the adaptation journey than Australia. Regarding coastal inundation and adaptation, those countries could include New Zealand, Netherlands and United Kingdom.
How should adaptation success be measured?	A logical framework approach is recommended for establishing success indicators. At an 'output' level, adaptation success can be measured as a reduction in predicted damages (lead indicator) and actual damages (lag indicator). At an 'outcome' level, adaptation success could be measured through indicators of community liveability, resilience and well-being.
What time horizon should the National Adaptation Plan cover?	We have no objection to the time horizons identified on page 5 of the First Pass assessment report. However, we do query why the year ranges are not contiguous.

Box 4

Do you support the draft principles for prioritising and sequencing adaptation actions over time? Why or why not? Are there any gaps?

The draft principles are generally supported. Other principles could include pursuing adaptation based on:

- prioritising risk to life over risk to property
- best practice adaptation planning approaches such as the dynamic adaptive policy pathways (DAPP) approach
- inter-disciplinary adaptation planning approaches that integrate fields of science, engineering, urban planning, economics, law and social science
- appropriate decision-making frameworks that account for complexity and uncertainty
- available public or private sector investment opportunities
- heightened political and/or community desire for adaptation particularly following significant events
- significant national and international collaboration opportunities

Box 5

What other existing policies are supporting adaptation for this system?

We note that the recent release of the State Disaster Mitigation Plan by the NSW Reconstruction Authority commits to the development of policies related to managed relocation, building codes and standards updated to consider resilience to natural hazards, and disability inclusiveness in disaster risk reduction.

Who should be undertaking action to strengthen adaptation action in this system?

At a federal level, we urge DCCEEW and CoastAdapt to provide up-to-date guidance on coastal adaption planning.

For coastal adaptation in NSW, we believe the NSW Government and specifically the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) should be taking the lead role in promoting adaptation through the NSW coastal management framework. DCCEEW is currently preparing guidance for local councils on coastal adaptation triggers and thresholds, however, we anticipate this can only serve as a starting point for adaptation planning.

The NSW Reconstruction Authority will also play a role through the State Disaster Mitigation Plan and its promotion of disaster adaptation plans (DAPs). We are yet to understand how DAPs will integrate with the NSW coastal management framework and CMPs.

What are the barriers to strengthening adaptation? How could the National Adaptation Plan help with these?

Barriers to adaptation have previously been identified at a federal level through inquiries such as the 2009 Parliamentary inquiry on 'Managing our coastal zone in a changing climate' and the 2012 Productivity Commission's inquiry on 'Barriers to effective climate change adaptation'. These barriers included a lack of national leadership and funding support for coastal zone management and adaptation.

Funding for adaptation remains a key barrier. At a federal level, SCCG has unsuccessfully applied for funding under the Disaster Ready Fund Round 2 to prepare a coastal adaptation planning framework for Sydney. We understand the funding round was significantly over-subscribed suggesting that there is considerable and potentially unanticipated demand for funding.

In NSW, we believe Sydney coastal councils are not as well supported by the NSW Coastal and Estuary Grants Program as they could be. For instance, the grants program does not acknowledge the unique challenges of preparing regional, multi-council CMPs which are the current delivery mechanism for coastal adaptation, and limits funding for regional organisations like SCCG to project manage the CMP.

	<p>The National Adaptation Plan could assist by identifying differences in state grant funding programs and attempt to facilitate harmonisation. We would also encourage the Federal Government to work collaboratively with the NSW Reconstruction Authority and NSW Treasury in developing principles for sharing costs for disaster risk reduction between federal, state and local governments and private asset owners as suggested in the State Disaster Mitigation Plan.</p>
<p>What policies could be strengthened or added as the highest priorities?</p>	<p>Although not policies per se, we suggest that the Federal Government's CoastAdapt and Disaster Ready Fund require immediate strengthening.</p> <p>In the first instance, we believe CoastAdapt should be resourced to a level similar to when it operated under the National Climate Change Adaptation Research Facility (NCCARF). There is a need to update CoastAdapt resources to consider international best-practice approaches to adaptation planning such as the dynamic adaptive policy pathways (DAPP) approach.</p> <p>We also await the outcomes of the current review of Commonwealth disaster funding arrangements and look forward to any announcements around how local governments can gain easier access to federal funding for adaptation planning.</p>
<p>What measurement and evaluative tools and processes should be implemented to track adaptation progress for this system?</p>	<p>We are not familiar with any tools or processes for measuring and evaluating adaptation. We were intending to develop a monitoring, evaluation and reporting (MER) program as part of our proposed Sydney coastal adaptation planning framework.</p> <p>We note in the State Disaster Mitigation Plan that the NSW Reconstruction Authority has committed to developing a monitoring, evaluation, accountability and learning framework for continuous improvement of disaster risk reduction.</p>