



Reference: 011-2025-JM

Thursday, 8 May 2025

The Hon. Janelle Saffin, MP  
Minister for Recovery  
GPO Box 5341  
SYDNEY NSW 2001

By online contact form

**Re: Disaster adaptation planning for Sydney**

Dear Minister Saffin,

I write to you on behalf of the Sydney Coastal Councils Group (SCCG) regarding the NSW Reconstruction Authority's disaster adaptation planning initiatives including progress of Disaster Action Plans and the feasibility assessment for large scale beach nourishment.

**Background to the SCCG**

The SCCG is a regional organisation of councils (ROC) established in 1989 to promote collaboration among member councils on the sustainable management of the urban coastal and estuarine environments in the Sydney Region. The group comprises nine councils which together represents nearly 1.3 million Sydney-siders.

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.

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 climate change related projected sea level rise.

**SCCG support for disaster adaptation planning**

The SCCG supports its councils in developing Coastal Management Programs (CMPs) which are the primary mechanism by which councils manage coastal hazards. The SCCG is leading an important multi-council CMP for Outer Sydney Harbour which seeks to align with coastal adaptation planning, particularly considering the threat of estuarine inundation. 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 SCCG previously raised concerns about the progress of disaster adaptation planning in our submission to the [Joint Select Committee on the NSW Reconstruction Authority Act 2022](#), in relation to various issues including the ambitious timeframes for Disaster Action Plans (DAPs)

identified under the SDMP, lack of clarity of funding for DAPs and potential replication of already existing programs such as CMPs. We note the release of the Committee's report on the findings and the recommendations and await the NSW Government's response.

The [SCCG submission on the Draft DAP Guidelines](#) relayed our views relating to Regional Organisations of Councils, including the SCCG being represented on DAP Regional Steering Committees, significance of coastal hazards in the Sydney Region, organisational capacity of councils to be assessed in Stage 1, more details needed on adaptation pathways assessment in Stage 3 and governance structures to be identified in Stage 5. The SCCG also sought more details on the relationship between DAPs, CMPs and other planning strategies. We note the NSW Reconstruction Authority (NSW RA) response to submissions in the Engagement Summary Report and look forward to the finalisation of the Draft DAP Guidelines to support development of remaining DAPs.

### **Further concerns about progress of DAPs**

The SCCG recently sought further updates from the NSW RA on the limited detail that has been provided so far for the delivery of its work program, membership of the regional DAP committees and the consultation process being committed to.

We note that the SDMP commits to all areas in the state having a DAP in place within the next five years. Given that 18 months on, only two DAPs are under preparation, it remains questionable whether the timeframes are achievable.

Our concerns relate chiefly to the anticipated nature and timing of a DAP and/or multiple DAPs for the Sydney Region for which there is no more detail. We recently sought updates on the proposed representation on Regional Steering Committees and boundaries for DAPs and were advised that each would be determined under the Readiness stage of the DAP process. However, there is still no timeframe for this. The NSW is still developing its work program for preparation of DAPs across the State, with further information to be provided on the proposed timing of DAPs for individual regions to be made available as the program is confirmed. It is important to provide sufficient lead time for DAP development to allow for a robust and comprehensive development process, coordinated with CMPs and appropriate stakeholder engagement.

### **Parliamentary report on the NSW Reconstruction Authority Act**

Following release of the Committee's report, advice was recently sought from the NSW RA about whether the NSW Government is committing to the recommendations outlined and if so, when we could expect to see engagement for related actions. The SCCG was advised that NSW RA was unable to comment on NSW Government's position at this stage.

In anticipation of a DAP or multiple DAPs for the Sydney Region, there are key recommendations that will inform the development process, with examples summarised below:

*R5. Guidelines to clarify the scope of the NSW RA's powers for planning decisions in consideration of the state's existing planning framework.*

*R7. Guidelines on the role and responsibilities of local government with regard to NSW RA functions.*

These guidelines are critical to an effective DAP development process, coordinated with local government responsibilities. It is likely there is insufficient lead time for preparing the guidelines, given the impending timeframes for DAP development.

### **Concerns about progress of the beach nourishment feasibility initiative**

The 'Large-scale Beach Nourishment Feasibility Assessment' is being led by the NSW RA, under SDMP Action 4 with funding secured under the Commonwealth's Disaster Ready Fund.

The NSW RA recently provided an overview of initiative's progress. The SCCG sought further information about:

- how councils would be consulted at key points in the initiative

- how the outcomes would be implemented through CMPs
- if there would be transparency over the methodology being used to prioritise nourishment sites and determine cost-effectiveness and
- whether planning approval pathways and their costs would be explored as part of the feasibility assessment, with consideration of councils' capacity for cost contributions.

We were advised that information on the feasibility assessment will be disseminated to councils via the coastal councils roundtables. However, there are currently no council roundtables for the Sydney Region so it remains uncertain how councils will be informed about the progress of the beach nourishment initiative and whether councils would be engaged at key points.

The SCCG was also advised that the current work program is seeking to establish if beach nourishment is a feasible coastal hazard mitigation measure. As such, it won't prioritise nourishment sites but rather will shortlist a number of beaches at locations across the NSW coast to test the feasibility of nourishing different types of beaches in different locations. Should the current project determine that nourishment is a feasible mitigation measure, then further work will be required to develop a beach nourishment program for NSW, in collaboration with coastal councils. We are concerned about the uncertainty of outcomes and timeframes.

Further, the outcomes of the current phase of work are not anticipated to be directly implemented through CMPs. The interfaces between any future beach nourishment program and CMPs would be a key consideration for a future phase of work. We are also concerned about the uncertainty of the value of the outcomes to CMPs.

We understand that planning approval pathways and their costs are being considered as part of the feasibility assessment which will greatly assist councils. However, who pays for beach nourishment isn't addressed in the current program of work. Funding and finance arrangements will be a key consideration in any future phases of work, if the current assessment confirms the feasibility of beach nourishment.

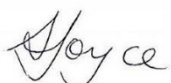
## Recommendations

The SCCG urges you to:

1. Hasten the completion of the NSW RA's work program so that advice can be provided and remaining DAPs including for the Sydney Region, can be commenced as soon as possible.
2. Respond to the Joint Select Committee's report on the review of the *NSW Reconstruction Authority Act* as soon as possible, giving priority to implementing those recommendations that immediately impact the effective process of DAP development, including the guidelines proposed under Recommendations 5 and 7.
3. Facilitate the immediate engagement of councils in the Large-Scale Beach Nourishment Feasibility Assessment to ensure timely and effective consideration of beach nourishment needs to assist councils in disaster planning and developing CMPs.

We look forward to your response on these important matters at your earliest possible convenience. If you have any queries, please contact me on 0407 733 075 or by email at [sarah@sydneycoastalcouncils.com.au](mailto:sarah@sydneycoastalcouncils.com.au)

Yours sincerely,



Sarah Penny Joyce  
**Executive Director**