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Monday, 16 March 2026

Department of Planning, Housing and Infrastructure  
Locked Bag 5022  
Parramatta NSW 2124

Dear Sir / Madam

**Re: Climate Change and Natural Hazards State Environmental Planning Policy and draft Climate Change Scenario Guidelines**

The Sydney Coastal Councils Group (SCCG) welcomes the opportunity to make a submission on the NSW Government's proposed *Climate Change and Natural Hazards State Environmental Planning Policy* (SEPP), as outlined in the Explanation for Intended Effects (EIE), as well as the *draft Climate Change Scenario Guidelines*. We ask that our submission be read in conjunction with submissions from our individual [member councils](#).

Although we understand that the NSW Government is not seeking feedback on the *Consideration of Tolerable Risk for Natural Hazards in Land Use Planning Guideline* (2026), given it's noted in the EIE we have provided general comments on the guidelines.

**1. Background**

The Sydney Coastal Councils Group (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. The group comprises nine councils which together represent nearly 1.3 million Sydneysiders.

The SCCG is guided by its [2019-2029 Strategic Plan](#). Goal 1 of the plan seeks to ensure people and places are adapted to a changing climate and future shocks and stresses. More specifically, SCCG aims to increase the resilience of the Sydney region to natural hazards and climate change, including from sea level rise, primarily through the efficient delivery of coastal management programs (CMPs).

To that end, SCCG is currently project managing the [Outer Sydney Harbour CMP Stage 2-4](#) on behalf of eight partner councils and several state agencies. Our member councils are also involved in developing other CMPs across the Sydney region.

Accordingly, we would like to direct our comments towards the discussion and proposed changes given in Section 2.5 of the Department of Planning, Housing and Infrastructure's (DPHI) Explanation of Intended Effect (EIE) related to coastal hazards. We have also made introductory comments related to coastal adaptation planning and the need for ongoing guidance.



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## **2. Consideration of statutory land-use planning within broader framework of coastal adaptation planning**

The SCCG is generally supportive of DPHI's intention to create a clearer, simpler and consistent approach to planning for climate change and natural hazards. However, it is important to acknowledge that statutory land-use planning approaches are necessarily targeted towards future development and cannot be easily applied to address issues of legacy development exposed to natural hazards.

The limitations of planning powers in addressing coastal hazards was highlighted in our [submission to the NSW Parliamentary Inquiry into the planning system and the impacts of climate change on the environment and communities](#). In this submission, we argued that statutory land-use planning approaches and instruments must be considered alongside other approaches such as strategic land-use planning (including infrastructure planning), coastal engineering and managed relocation when managing the coastal zone. It is therefore pleasing to note that the EIE states in Section 2.2.1 that planning controls need to be considered in the context of other risk reduction options such as mitigation infrastructure and evacuation infrastructure, and aligned with future disaster adaptation plans (DAPs).

With respect to coastal hazards, however, we would urge DPHI to go further to consider how statutory planning approaches can be integrated within an overall framework of coastal adaptation. SCCG has previously called on the NSW Government to develop a coastal adaptation planning framework as detailed in our [position paper on coastal inundation and sea level rise](#) as well as our [submission on the draft NSW Disaster Adaptation Plan guidelines](#). SCCG is also scoping the development of a coastal adaptation planning framework for Sydney Harbour as part of the Outer Sydney Harbour CMP Stage 2-4 project.

## **3. Need for guidelines to support development control plans**

We note DPHI has requested feedback on what additional guidance would be needed to support the implementation of the new SEPP. We believe, however, that additional guidance is not needed for the new SEPP.

SCCG instead recommends that any additional guidelines prepared by DPHI (or other agencies) be used to help establish and support the implementation of development controls within councils' development control plans (DCP). This is because DCPs are usually more accessible to councils and development proponents compared to SEPPs, and should provide the necessary detail for how new developments can assess and ultimately reduce risk.

There is also the potential issue that any guidelines developed to support the SEPP could simply be ignored, or worse, confound more specific guidance that will be needed to support development controls in a DCP. To address this, we suggest that any guidance prepared for DCPs detail specifically how addressing the DCP controls will also meet the SEPP controls.

## **4. Coastal management areas**

Section 2.5.1 of the EIE states in part that the coastal risk planning clauses and coastal related provisions in the LEPs of certain councils provide a similar function to the coastal vulnerability area (CVA) clause in the current SEPP (Resilience & Hazards), resulting in complexity and potential duplication. Given only two NSW councils have mapped CVAs for their local government areas (LGAs), we would firstly query what evidence exists to suggest there is complexity and duplication in addressing the requirements of both the SEPP and LEP, that may currently be producing sub-optimal outcomes.

DPHI is proposing to update the CVA clause to ensure any proposed development adequately considers the risk of current and future hazards. Again, we query whether there is evidence to suggest that development currently being proposed in the coastal zone is not adequately addressing current and future coastal hazards, whether under existing LEP and DCP controls or together with SEPP controls.

A key control of the CVA clause is that proposed development be engineered to withstand current and projected coastal hazards for the development's design life. Such a control may conflict with and override controls within a LEP or DCP that support, for example, managed retreat, if such an action were to arise from a CMP. SCCG therefore recommends that the CVA clause be updated to reflect that development should only occur where it is consistent with a broader plan for coastal adaptation. This would strengthen the application of Clause 2.13 of the existing SEPP related to the need to consider the relevant provisions of a certified CMP.

Given the extent of the proposed changes and the limited timeframe in which to comment on the EIE, we would appreciate the opportunity to review and comment on any updated CVA clause prior to the new SEPP being formally adopted and gazetted.

SCCG believes there is value in either keeping or introducing clauses related to coastal management in councils' LEP. This provides a better link between the LEP and DCP and allows for community input when updating the LEP. We suggest DPHI consider introducing a model LEP clause related to coastal management in the LEP standard instrument that councils can adopt for their LEPs.

## **5. Coastal protection works**

We support DPHI's intention to review SEPP clauses related to coastal protection works to consider a risk-based framework, an expansion of the types of works that can be undertaken, and how works should be assessed.

We suggest this review consider instances where extant coastal protection works may no longer be needed. For instance, there may be public seawalls around Sydney's estuaries that were constructed as part of land reclamation and open space provision but which may now be cost-prohibitive to maintain and would be better suited to being restored to a more natural shoreline.

SCCG notes the challenges for councils to meet the 90-day time limit for temporary coastal protection works. We suggest this time limit and the overall clause be reviewed such that councils are given sufficient time to fully investigate, design, fund and install permanent coastal protection works in line with council priorities and in accordance with a certified CMP.

## **6. Coastal vulnerability area mapping**

SCCG is currently in the process of mapping coastal hazards such as tidal and coastal inundation, beach erosion, shoreline recession and cliff instability as part of Stage 2 of the Outer Sydney Harbour CMP. The implications of these hazards for strategic, statutory and asset planning will then be considered during CMP Stage 3. This will include a review of existing planning and development controls as well as the opportunity to use updated hazard information to map a CVA. At this point, the CMP Stage 2-4 project does not include any allowance for preparing a planning proposal to map CVAs.

Although this would need to be further explored with our members, based on our work with the OSH CMP project, we suggest DPHI further explore the option of using the mapping developed for the 2025 NSW coastal erosion and inundation hazards and exposure assessment to set a state-wide CVA, provided mapping encompasses any existing LGA-specific mapping prepared by councils. This would reduce the burden on councils in preparing their own planning proposals for CVA mapping and ensure a consistent, easily understood approach across the state. This mapping could be refined later if needed once CMPs are completed and certified.

Finally, the CVA is a static map that does not convey the dynamic nature of coastal risk and the need for coastal adaptation. Mapping needs to be understood within a broader context of coastal adaptation that considers factors such as actual adaptation triggers and thresholds, the ability of public assets and services to continue to service new development, and community sentiment.

## **7. Minimum requirements in the draft Climate Change Scenarios Guidelines should be reconsidered**

SCCG has several concerns related to the application of the proposed guidelines.

Firstly, Section 2.3 and Table 2 of the guidelines explicitly note that the guidelines will not apply to single dwelling development or alterations and additions to existing buildings. No explanation is given as to why these types of development would be excluded.

We would argue that the impacts of climate change and sea level rise should be considered for these types of development given that, for much of the foreshore in Sydney, these will be the dominant development types. We also suggest that the development or redevelopment of single dwellings on the foreshore could be a substantial undertaking with a predicted useful life of that development extending beyond the 50-year modelling timeframe given in Table 2.

Moreover, climate change scenarios should consider the public infrastructure required to support any new single dwelling development such as roads, open space and public utilities. Public infrastructure in the coastal zone is highly likely to be impacted by coastal inundation with sea level rise before private property is impacted, and as such, may compromise the safety, insurability and overall viability of any new private development.

We are concerned that the minimum emissions scenarios and modelling timeframes given in Table 2 of the guidelines could prevail over higher scenarios and timeframes adopted by councils when developing CMPs. We therefore recommend the guidelines be strengthened to state that the emissions scenarios and timeframes adopted in CMPs take precedence in land-use planning and development decisions over the minimum requirements given in these guidelines, assuming these are still above the minimum requirements.

## **8. Tolerable risk should be considered within a coastal adaptation planning framework**

We note that DPHI has released a guideline for considering tolerable risk for natural hazards in land-use planning. While guidelines are normally welcome, we would query the usefulness of the new guideline on tolerable risk.

The concept of tolerable risk is not new, rather it is an established part of general risk management practice. The application of tolerable risk is generally well understood in certain risk management endeavours like floodplain risk management but less so when considering the threat of tidal and coastal inundation, particularly given inundation risk will change as the trajectory of sea level rise becomes clearer.

Unfortunately, the five-page guideline on tolerable risk could only be considered a very basic introduction to risk. It does not have the necessary detail on approaches to fully quantify risk or to consider how best to manage risk, particularly when compared to other NSW Government guidelines like [Managing flood risk through planning opportunities - Guidance on land use planning in flood prone areas](#) or [Triggers and thresholds - Adaptation planning in CMPs](#).

In the coastal context, tolerable risk should be considered within the framework of coastal adaptation planning. Such planning would seek to quantify the inter-related factors given in Attachment A of the tolerable risk guideline and determine 'adaptation pathways' as a mean of dynamically responding to the risk as the risk changes over time with rising sea levels.

I trust our comments will be helpful. Please don't hesitate to contact me by email at [sarah@sydneycoastalcouncils.com.au](mailto:sarah@sydneycoastalcouncils.com.au) if you have any queries.

Yours sincerely

A handwritten signature in blue ink that reads "Joyce". The signature is written in a cursive, flowing style.

Sarah Penny Joyce  
**Executive Director**