

21 August 2024

Disaster Adaptation Planning Team
dap@reconstruction.nsw.gov.au

Re: Submission on the Draft Disaster Adaptation Plan (DAP) Guidelines

Dear Reconstruction Authority,

The Northern Sydney Regional Organisation of Councils (NSROC) is pleased to respond to the NSW Reconstruction Authority's draft Disaster Adaptation Plan (DAP) Guidelines, while noting individual councils may also make independent submissions. This submission has been prepared with the input and support of our member councils but should be considered draft until it is formally endorsed by the NSROC Board.

NSROC is a voluntary association of eight local government authorities in northern Sydney. NSROC assists member councils collaborate on key issues and activities, develops regional solutions and generate social, environmental and economic benefits – for local communities and the region overall.

The eight NSROC member councils are:

- Hornsby Shire Council
- Hunter's Hill Council
- Ku-ring-gai Council
- Lane Cove Council
- North Sydney Council
- Mosman Municipal Council
- City of Ryde
- Willoughby City Council

NSROC member councils service an area of 639km² stretching from the Hawkesbury River in the north to Sydney Harbour and Parramatta River in the south and generally west of the Harbour Bridge. The region is home to over 650,000 people, many who have felt the effects of several disasters in recent times, with some experiencing multiple or compounding instances of flooding, storms and bushfires. Our communities continue to bear the social, environmental and economic costs of these disasters and we commend the NSW Government for taking the first step in developing a coordinated, proactive, placed based approach to disaster adaptation planning.

The draft DAP Guidelines are a good first step in prevention, preparedness, and adaptation, with the simple objective of moving people, property, and assets out of harm's way while improving resilience of communities and providing reduced economic impacts. The draft Guidelines provide the broad framework for the establishment of a DAP however for them to be successful it is recommended that the following be considered:

- **Clarification on the development of the DAP regions**
 - Councils are in favour of the draft DAP principles which take an all-hazard approach and include secondary impacts.
 - If regions are too large, they could lose the ability to address local issues. A one size fits all approach will not work.
 - Regional boundaries will be complex and not always practical. Look at natural boundaries and take a place-based approach.
 - Long term issues such as heat could be looked at a metropolitan wide scale with local responses for more vulnerable areas.
 - Some secondary impacts (such as the disruption of the transport and processing/disposal of municipal waste) can be caused by multiple hazards and may impact different regions to that where the hazard occurred.
 - Tap into existing networks such as Resilient Sydney who have pulled together existing groups to establish a consistent approach to planning and preparation. Also, the Cross Sector Liaison Group formed as part of the SSROC led Waste Risk and Resilience project.

- **Identification of funding sources**
 - Councils operate in a complex resource-constrained environment. The current draft Guidelines have no clear funding identified for staffing, resourcing or implementation. The draft Guidelines indicate that the DAP will create avenues for funding chances and introduce new financial strategies, yet they do not specify what those strategies entail or provide a schedule or expectations for their implementation. Funding needs to cover resources to do the role, establish the plans and fund the capital infrastructure and ongoing maintenance / life cycle assessment.
 - Existing roles such as council Local Emergency Management Officers vary from council to council, with some roles making up a minor portion of overall delivery compared to high hazard areas with dedicated teams. If the impost for the expected delivery in this space is to increase, then appropriate and supported resourcing needs consideration.
 - The draft Guidelines illustrate that the DAP will provide a pathway for funding opportunities and access to new funding and finance strategies but fails to outline what these are, expectations for delivery and timing.
 - Clarification is required on how the DAP Implementation Plans will be funded. It is anticipated that the actions contained within the Implementation Plans will be significant (i.e. house raising, land buy back). Will a co-contribution be expected from Local Government to implement actions in the Implementation Plan? Councils do not want to raise expectations within the community if actions will not be able to be

implemented. Should Council be required to contribute funding a resolution of Council would be required.

- The timeframe is not clear for the establishment of the plans or roll out – a lot of work will be involved in the development of the plans, and this will be required over a number of years. Also, given the range of hazards to be addressed, how will these be prioritised?
- How long will the funding last? Will it be a competitive bid process? Will it follow a prioritisation process based on a risk matrix? How will this be distributed on an equitable basis? How will councils be given the opportunity to influence this process?

- **Clarification on the Governance Structure**

- Does the DAP and Implementation Plan have to be adopted by Council?
- State government departments need to be aligned – Planning, Reconstruction Authority, Transport, Environmental Protection etc
- It is unclear how the EMPLAN and LEMC integrate with the DAP and the overlap between other risk-based strategies such as flood and bushfire risk management plans. Clear articulation on how these will work with and not duplicate efforts or water down approaches is required. The DAPs need to consider existing expectations for councils to comply with under various legislative plans and seek to effectively work with and optimise outcomes.
- The Reconstruction Authority will need to work with councils to efficiently and effectively develop and deliver these to minimise impost onto council resourcing.
- Provision of an open forum or workshops with all stakeholders is recommended to come to a collectively agreed position on the regions before the Steering Committees are established.
- How will the DAP process productively engage and partner with emergency responders (eg SES, RFS), Red Cross) and avoid duplication and confusion in the broader community.
- To what extent will the DAP process provide the necessary strategic and funding support to enhance the capacity of emergency responders who are dependent on an aging volunteer workforce.

- **Further clarification is required**

- Consideration of local context needs to be incorporated early in the process.
- The draft guidelines outline that further guidance and supporting tools will be prepared. The documentation for the development of Coastal Management Plans provides a good template for the level of detail required – Multiyear and multi-faceted. It is recommended that further documentation be prepared to support each Stage of the Plan.
- A diagram outlining the hierarchy of plans would be beneficial in the guidelines.
- Guidelines need to establish a prioritisation matrix.
- The DAPs appear to have a focus on ‘bricks and mortar’ approaches. To what extent will a DAP also include and fund measures to raise community awareness of disaster risk and how to avoid it, or be better prepared in emergencies?

NORTHERN SYDNEY REGIONAL ORGANISATION OF COUNCILS

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- It is important to take key commercial stakeholders and the property industry ‘on the journey’ to disaster adaptation. How will the DAP process engage with and involve these sectors e.g. real estate, insurance, marina operators etc.?
- **Integration with strategic planning outcomes**
 - Although the draft Guidelines outline that the DAP must be considered by any planning authority when undertaking strategic planning and decision-making it is essential that the relevant council LEPs and DCPs be updated to reflect a disaster resilience approach. It is critical that planning reforms are undertaken to mitigate future risks and respond to our changing climate.
 - Local government already have strategic risk management plans such as bushfire risk management and mitigation plans, coastal management plans, flood risk management plans, EMPLANS - the DAPs need to ensure duplication does not occur through this process but builds on these and clearly links to these in all documentation, prioritisation and risk management planning.
 - Will the DAP have a mechanism for DAs for developments in high-risk areas to be referred to a Regional DAP steering group or NSW Reconstruction Authority to inform assessment?
- **Coordinated Community Consultation**
 - Numerous community engagement activities have been undertaken over the past few years in relation to community resilience and climate change adaptation. Any Community Engagement Plan will need to consider the engagement fatigue being felt in the community and what data already exists which can be assisted through working directly with councils prior to attempting to engage communities.

NSROC member councils look forward to engaging with the Reconstruction Authority on further improvements to the draft Disaster Adaptation Plan (DAP) Guidelines. If you require more information or would like to collaborate further, please don't hesitate to contact me at mmontgomery@lanecove.nsw.gov.au or by phone on 0401 640 823.

Yours sincerely



Dr Meg Montgomery

Executive Director

Northern Sydney Regional Organisation of Councils