



Submission to the NSW Independent Flood Inquiry

May 2022

*The CHIA NSW and ACHIA offices
are located on land traditionally
owned by the Gadigal Clan of the
Eora Nation.*



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About this submission

The Community Housing Industry Association NSW (CHIA NSW) welcomes the opportunity to provide a submission to the NSW Independent Flood Inquiry.

This submission draws on the experiences of community housing providers (CHPs) impacted by the recent devastating floods in NSW, focusing on the events in the Northern Rivers region. The submission has also been informed by CHP experiences with prior floods and natural disasters across NSW.

Despite their property and tenants being directly impacted, CHPs and other local service providers have been instrumental in delivering support and services to impacted communities in the aftermath of the floods. However, a recurring theme in the experiences of our members is that a lack of coordination between agencies and service providers has significantly hampered the flood response.

Natural disasters, such as flooding, place considerable pressure on local service providers, including CHPs. It is important to note that the NSW floods, which left thousands of people without a home, occurred in the context of an ongoing housing and homelessness crisis in NSW, including in the Northern Rivers region.

For example, between 2011 and 2016 rates of homelessness in Northern NSW increased by 15%¹ and homelessness services across NSW have continued to experience unprecedented demand in the years since. In the month before the floods, the Northern Rivers region had a rental vacancy rate of just 0.7%², whilst more than 2,625 households were on the social housing waiting list in the region at 30 June 2021.

This severely limits the capacity to rehouse people in times of emergency, placing increased strain on front-line services.

When people and families are faced with insecure housing they are at greater risk of experiencing negative life outcomes, including homelessness, poorer mental and physical health, domestic and family violence, relationship breakdown, poverty, and disengagement from education, training, or employment. The provision of safe, secure, and affordable housing provides a foundation for individuals and families to recover from devastating events such as floods.

CHPs are ready to support the NSW Government and industry partners in supporting communities affected by flooding on the road to recovery, starting by ensuring people have a safe and secure roof over their head.

About CHIA NSW and community housing providers

The Community Housing Industry Association NSW (CHIA NSW) is the peak body representing registered, not-for-profit community housing providers (CHPs) in NSW. Our members currently own or manage more than 51,000 homes across NSW for individuals and families who cannot afford to rent or purchase a home on the private market. Approximately half of these homes are in regional communities.

The community housing sector delivers a range of services to the people of NSW. This includes specialist homelessness services, crisis housing, temporary accommodation, seniors housing, and youth housing. In addition to providing safe, secure and affordable accommodation, CHPs deliver a range of support services to improve tenant outcomes.

¹ Homelessness NSW, [Census data factsheet](#), accessed 11 May 2022.

² REINSW, [Vacancy Rate Survey](#), April 2022.

Recommendations

- Include CHPs and other local support providers, such as homelessness services, in emergency management prevention and preparation planning, with a focus on client safety and additional support requirements.
- Roles and responsibilities of different agencies and service providers must be clearly articulated in emergency response plans and local recovery plans.
- Improve the resilience of communications infrastructure and invest in an improved early warning system for flood prone communities.
- Ensure the State Emergency Service has the resources, equipment and training needed to respond to crisis situations in a safe and timely manner.
- Ensure Recovery Coordinators have sufficient powers and authority to coordinate response efforts across government departments and agencies.
- Set up sufficiently stocked and equipped evacuation centres in safe locations before a crisis occurs, so that they can be activated at a moment's notice.
- In the immediate aftermath of a crisis, make relief grants immediately available to CHPs and local service providers to support them to manage the influx of clients and increased workload during an emergency and in the recovery period.
- Provide ongoing disaster recovery funding to ensure the community has access to necessary support in the years following a crisis, not just in its immediate aftermath. This needs to include additional funding for mental health services.
- Prioritise the rebuilding of existing social housing affected by the floods. This must include the provision of funding directly to CHPs whose properties were destroyed or damaged in the floods, not just the Land and Housing Corporation.
- Invest in additional social and affordable housing to address the critical shortage of housing in flood impacted areas, and build capacity in the crisis system.
- Ensure the Northern Rivers Reconstruction Corporation (NRRC) has the necessary powers and authority to coordinate across government and expedite the rebuilding process. This needs to include streamlining of strategic planning and approvals processes, assistance to homeowners to navigate the planning system, and overcoming construction industry and supply constraints.
- Undertake an immediate review of land use plans for flood prone areas to identify opportunities for responding to flood hazards, including moving to higher ground where practicable.

CHIA NSW submission to the Inquiry

Preparation and planning for floods

CHPs and other local service providers have observed a concerning lack of coordination in the response to the Northern Rivers floods. This included confusion over roles and responsibilities, a lack of preparedness by some agencies, and the absence of a single point of authority. Consequently, the flood response has not been as effective and timely as it could have been. These issues unnecessarily exacerbated the distress experienced by the community and, at times, placed people in increased danger.

While the NSW Government appointed a Northern NSW Recovery Coordinator to lead and direct resources in the aftermath of the floods, CHPs reported that the Coordinator lacked sufficient

authority to make decisions and coordinate across relevant government agencies involved in the response.

Missed opportunity to engage with local service providers

CHPs have expressed frustration and disappointment that, despite being amongst the first in line to support the community in times of crisis, they received little to no contact by government agencies in the days and weeks following the floods. Nor were they invited to participate in the local-led Recovery Committees that were established to give local communities a clear voice in decision making, including on waste and clean up, housing and business.

This lack of communication and engagement contributed to confusion over roles and responsibilities. For example, one provider who took on the management of a temporary accommodation camp reported that every time they referred someone to Resilience NSW for assistance, Resilience NSW would refer them back to the provider. This left people frustrated and without clear answers. It also created a dangerous situation where staff were exposed to anti-social behaviour. It is understood that one camp was almost closed due to anti-social behaviour.

A South Coast NSW based CHP reported similar experiences of not being directly engaged in the recovery response to the 2019 Black Summer Bushfires. Concerningly, despite the need for early engagement of local service providers being raised as part of the review into the bushfires, these lessons were not incorporated into the recent flood response.

The response to flooding and other natural disasters will be strengthened if local service providers, including CHPs, are engaged in the preparation and planning for such events and there is clarity over roles and responsibilities.

Improving preparation and planning for future natural disasters

Despite state and local flood emergency management plans being put in place, most plans applying to the Northern Rivers region are out of date, having not been reviewed since 2013. There is an urgent need to update these plans to incorporate anticipated changes to flood risks and hazards as a result of climate change, and to implement the lessons learnt from the floods and prior natural disasters.

These plans need to provide clearer guidance on the roles and responsibilities of CHPs and other local service providers. The focus of existing plans tends to be on the role of government agencies and larger national charities that are funded to deliver disaster recovery assistance, noting that this approach has not been effective during the recent floods. Many larger charities do not have a presence in affected regional areas and therefore lack the local knowledge and agility of locally based organisations.

Emergency response to the floods

Inadequate communication

Like many in the community, CHPs are deeply concerned with the lack of communication and warnings provided to residents, businesses and service providers during the floods. Consistent with media reports, CHIA NSW's members reported that the evacuation advice to the community kept changing, or in some cases were not provided at all, or came too late. This was exacerbated by outages across the mobile and National Broadband Networks, which meant that the only way people could learn of developments was through local ABC radio.

CHIA NSW is concerned that this contributed to many people in the community being left stranded on their roofs and balconies as the flood waters rose. For CHPs, this included vulnerable tenants with higher support needs, such as the elderly and those with mobility and/or mental health conditions. For example, one CHP reported receiving phone calls at 4am from physically impaired clients in distress who were stranded on their balcony with flood waters up to their chest and anxious about whether they were going to be rescued.

Patchy SES response

CHPs have reported that stranded residents were unable to get through to the State Emergency Service (SES) to request help, which added significantly to their distress. Those needing assistance had to resort to calling 000 in an attempt to get rescued. However, many residents ultimately relied on private citizens for rescue. One CHP recounted how the residents of an aged care facility in Lismore were left stranded and had to be rescued by private citizens.

It is understood that the lack of response from the SES was due, at least in part, to the SES taking the view that the situation was too dangerous for their personnel to perform rescues. While the safety of emergency services personnel is paramount, this led to untrained private citizens putting themselves in danger.

Adequacy of evacuation centres

CHPs have raised concerns with the adequacy of the evacuation centres that were set up. These include:

- Limited availability of essential medication and supplies.
- There was no separation of clients - for example, victims of domestic violence were in the same space as perpetrators.
- There was confusion around the location of evacuation centres. For example, in Ballina, locations changed in the middle of the night due to flooding of the initial centre. Some people could not access emergency accommodation due to flooding on roads.

In response, CHPs and other local service providers voluntarily sourced needed supplies and provided support to evacuees, including health and wellbeing checks. In some locations, such as Lismore, this task was made more challenging due to the flooding of supermarkets.

Better planning is required to ensure evacuation centres and emergency accommodation are adequate, sufficiently stocked, and can be activated quickly. CHIA NSW notes that while current flood emergency response plans identify potential locations for evacuation centres, they are only established after a flood has occurred, and only on the direction of the SES.

By contrast, CHPs provided the example of the Northern Territory, where permanent evacuation centres have been set up in public facilities such as schools. These are stocked with the necessary supplies and are ready to become operational at a moment's notice.

Recovery from the floods

As previously noted, there was a concerning lack of coordination and engagement with local service providers in the immediate aftermath of the floods. CHPs and local service providers were required to provide assistance at very short notice from agencies, or entirely of their own initiative.

For example, one provider was directed by the Department of Communities and Justice (DCJ) to manage emergency accommodation camps for several weeks because DCJ staff had not completed the necessary training. The provider delivered this service despite a lack of additional funding being provided and staff needing to be redeployed from other service areas.

Housing challenges as a result of the floods

The Northern Rivers floods have exacerbated pre-existing housing affordability and rental supply issues in the region. Consequently, it has been very challenging to rehouse people displaced by the floods. The recently released Anglicare Australia Rental Affordability Snapshot³ confirms that affordability has worsened over the past year. The analysis found that less than 1% of properties available for rent in

³ Anglicare North Coast, [North Coast NSW Rental Affordability Snapshot](#), April 2022.

the North Coast region in March 2022 were affordable to pensioners and households living on income support payments. This compares to 3% of properties in 2021. Just 7% of these properties were affordable to households living on the minimum wage, compared to 12% in 2021.

In the aftermath of the floods, CHPs have reported price gouging as a result of the reduced supply of rental accommodation. For example, one provider observed a three-bedroom house in Byron Bay being marketed for \$700 per night. The impact on affordability has been compounded further by the fact that many of the more affordable properties in the region were within flood prone areas. As has been widely reported, even once people were housed some were forced to move again soon after as a result of holiday bookings.

Consequently, people have been asked to relocate significant distances from their hometown, or are experiencing homelessness, including having to rely on friends and family for support, living in their cars, or couch-surfing. It is feared that in the worst cases, people have had no option but to move back into their flooded homes. The lack of adequate accommodation for those impacted by floods also has the knock-on effect of reducing the capacity of CHPs and specialist homelessness services to house other people in crisis, such as those escaping domestic violence.

While the funding of motorhomes and modular housing by the NSW and Australian Governments is a welcomed start, these measures have limitations. As they provide only a basic level of amenity, they are only suitable as a short-term housing option, particularly for people who are dealing with the trauma of a natural disaster. Modular housing also takes some time to set up as it requires transportation, preparatory works, and the identification of suitable sites. This limits how quickly it can be deployed following an emergency. In the Northern Rivers, the first homes are only now becoming available, more than two months after the floods.

Flood relief payments and support

Although the provision of financial support for those impacted by the floods is welcomed, CHIA NSW questions the adequacy of the support measures that have been announced to date. For example, rental support of up to 16 weeks will provide limited assistance to those who have been unable to find suitable accommodation to rent due to the shortage of supply and price gouging.

Local service providers have identified that there is overwhelming demand for mental health support for those affected by the floods. While local service providers have been endeavouring to link people to support where possible, the demand is outstripping their capacity to assist. There is a pressing need for additional government funding for mental health support in flood affected areas.

CHIA NSW notes that the government support announced to date is primarily focused on short-term measures. However, for many people who have been impacted by the floods, the recovery phase will be a multi-year process, as evidenced by the example of bushfire affected South Coast communities. As such, additional ongoing funding needs to be made available to local service providers to ensure the community has access to required support beyond the initial aftermath of a disaster.

Business support

CHPs have raised concerns with the lack of financial support available to local service providers impacted by the floods. Many providers had to redirect their staff and resources away from other services areas in order to focus on the flood response and to backfill staff who were themselves personally impacted. This limits their ability to deliver other services, including those that generate income. Furthermore, CHPs have had to contend with flood damage to their own business premises. For example, one CHP had to close their Lismore head office as a result of flood damage, hampering their ability to provide support.

Despite the critical role they have played in the flood response, CHPs reported that they did not always qualify for business relief payments, and where they did, the relief on offer was insufficient to cover

their increased costs or lost income. This meant providers had to draw on their reserves to support the flood response.

There is a need for increased and broader financial support to local service providers to support their critical role in supporting communities impacted by natural disasters. Businesses that provide critical services to the local community need to be assisted to rebuild rapidly following a flood to support the broader recovery. This includes the provision of temporary business accommodation where necessary.

Longer-term rebuilding and community support

Supporting the rebuilding of housing

The replacement of lost homes is an urgent priority in the rebuilding of flood impacted communities. There are concerns that the rebuilding will take years, particularly given the current labour and materials shortages and supply chain issues. Without a concerted rebuilding effort, many impacted residents will have no option but to remain in insecure temporary accommodation for longer than necessary, move out of their communities, or at worst, experience homelessness.

While the NSW and Australian governments have announced financial support to assist with the rebuilding effort, further measures are needed. For example, the April 2022 announcement of \$168 million for the replacement of social housing was only made available to the Land and Housing Corporation (LAHC). This ignores the fact that much of the social housing impacted by the floods were owned or managed by CHPs, including properties leased from private landlords.

CHPs are concerned that higher costs associated with rising insurance premiums and future proofing buildings in flood prone areas will disincentivise private landlords from rebuilding damaged properties and/or making them available for affordable housing. Furthermore, there are concerns that many owners do not have insurance, or will increasingly choose not to insure their property, due to the high cost of premiums. This will place a further barrier on rebuilding in flood prone areas.

While a range of financial support is available to private landlords to make homes safe and habitable, including grants of to \$20,000 for repairs, these are insufficient to cover the anticipated costs given the extent of damage caused by the unprecedented floods. Additional support and incentives are needed to facilitate the rebuilding of housing. These could include grants, interest free loans and/or measures to tackle rising insurance costs.

CHPs welcome the opportunity to engage with the NSW Government on projects to increase the net supply of social and affordable housing in flood affected communities, including on CHP-managed sites where the cost of repairing existing social and affordable housing which have reached the end of their life cycle exceeds redevelopment costs.

Building resilience by investing in social and affordable housing

Alongside roads, community facilities, and utilities, social and affordable housing is critical infrastructure that supports productivity and liveability. It also provides an essential safety net for people needing support or who are at risk of homelessness.

As already noted, the floods exacerbated a pre-existing housing affordability crisis affecting regional NSW. This is exemplified by a lack of affordable rental accommodation and a growing social housing waiting list. The sector's ability to respond in times of crisis is severely hampered when the crisis system is itself already in crisis.

Without significant investment to grow the supply of safe, secure and affordable housing, particularly in regional NSW, there will be very little resilience and flexibility in times of emergency and disaster. Investment is also needed to rapidly decarbonise existing housing, to mitigate the worst impacts of climate change.

Northern Rivers Reconstruction Corporation

CHIA NSW welcomes the establishment of the Northern Rivers Reconstruction Corporation (NRRC) to lead the longer-term rebuilding of flood impacted areas, including a focus on housing. However, there needs to be greater clarity and transparency over its role and powers. The NRRC requires sufficient authority to make decisions and coordinate efforts across government agencies in a timely manner.

The NRRC needs to:

- Identify and facilitate measures to expedite the rebuilding process, including streamlining of planning approvals and overcoming construction industry and supply chain shortages.
- Work with the Department of Planning and Environment (DPE) to establish a one-stop rebuilding advisory service to assist people to understand their options and navigate the necessary approvals. This can be confusing and time consuming at the best of times, but is even more difficult for people dealing with the mental, emotional and physical stress of rebuilding after a natural disaster.
- Work with councils and DPE regional teams to review land use plans for flood prone areas. These need to consider opportunities to relocate communities to higher ground versus the long-term costs of continuing to rebuild on flood prone land. CHPs reported that there is a lack of suitably zoned land for affordable housing in less flood prone areas of regional communities. Regional councils should be incentivised to identify suitable land on higher ground and rezoning of this land expedited.
- Work with councils and relevant government agencies to identify government-owned land on higher ground that could be developed for social and affordable housing. This includes the renewal of existing public housing estates that are not flood prone.
- Ensure that where the buy-back of flood prone land occurs, owners receive sufficient compensation to rebuild elsewhere in the community. Without this, there is concern people may choose to leave the area, which would be detrimental to the recovery of regional towns.
- Ensure essential infrastructure, including flood defences and evacuation routes, is built back to a higher standard to ensure it can withstand the more extreme weather expected as a result of climate change.

In setting rebuilding priorities, the NRRC must be guided by local on-the-ground knowledge and expertise. In this regard, CHIA NSW welcomes the announcement that the NRRC will be supported by an advisory body consisting of local representatives. This needs to include representatives of CHPs and local service providers active in the Northern Rivers Region.