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NSW Independent Flood Inquiry 2022

inquiry@floodinginquiry.nsw.gov.au

Submission via on-line portal

Re: Kyogle Council Submission to the Independent Flood Enquiry

Background

Kyogle Council is a small rural council (pop. 9,550) that covers a large geographical area (3,584km²) with a complex road and bridge network (1,216km roads and 340 bridges) and a high proportion of the Local Government Area (LGA) is dedicated for National Parks and State Forests (approx. 30%).

Kyogle LGA is located within the Northern Rivers region of northern NSW, and is split in two halves along the upper Clarence and upper Richmond catchments. The local economy is highly reliant on agriculture, with beef cattle production, dairying, cropping and timber the major industries. Agriculture is the number one industry by employment in the Kyogle LGA and agriculture, forestry and fishing along with agribusiness manufacturing contributes 26.9 percent of the area's Gross Regional Product. The Northern Rivers Regional Economic Development Strategy 2018-2022 recognises Kyogle and Casino as the Northern Rivers' primary agricultural hubs.

Adverse events such as floods, storms, drought, bushfires, and pandemics, impact upon the productivity and profitability of the agricultural industry, which is the main employment area within the Kyogle LGA. When agriculture experiences a downturn, local services and businesses suffer as less money is spent locally. This may lead to staff unemployment, some businesses closing, fewer new employment opportunities and some people leaving the community to access employment elsewhere.

Adverse events also have significant social and environmental impacts. Stress associated with these types of events affects the health and wellbeing of the whole community. Assistance is needed for Council and its communities to prepare for these events in the future, and to recover from the cumulative effect of those we have experienced over recent years. The key strategies and actions identified in this submission are intended to help build community leadership, resilience, and capacity to adapt and cope with the chronic stresses and acute shocks caused by adverse events.

The support of Federal and State Governments is essential to this process, as local councils do not have the capacity to respond to the full extent required to protect their communities for future adverse events. The outcome of responding to the key strategies and objectives is a stronger community and stronger local economy.

In the three-year period from Feb 2019, the LGA has experienced an extended period of severe drought, months of large-scale bush fires, extended periods of heavy rainfall, and multiple storms and floods, all in the midst of the global COVID-19 pandemic.

This period of overlapping natural disasters and adverse events has shown the strength of the combat agencies and the overall emergency response management arrangements, as well as the resilience of our local communities. However, this has also highlighted weaknesses and a lack of overall cohesion in the areas of recovery and preparedness, as the machines of government struggled to keep pace with the rapidly changing circumstances.

Generally speaking, there is a concerted effort by a dedicated team of public servants, community groups, and volunteers, to provide for the response and recovery needs of our communities. However, their efforts are seriously hampered by an outdated, complex series of arrangements across multiple tiers of government and various support agencies, that is well overdue for a major overhaul.

What the last few years has shown, is that natural disasters and adverse events are no longer going to be unusual or rare occurrences. This is the new normal. In order to adapt to this and ensure the long-term sustainability of our rural and regional communities, there needs to be a shift in focus. It is not sustainable to continue to try to manage the impact of these events through local government coordinated efforts, and funding for restoration of damaged infrastructure alone. Local government does not have the financial capacity to do more than it is currently. The state and federal governments need to adjust their thinking, and their structures, to focus on a significant investment in improved resilience and large-scale mitigation programs aimed at reducing the impact of such events in the future.

The transition from response to recovery in any disaster or adverse event is a very fluid process. There are three distinct stages of recovery that need to be better recognised at all levels, with processes and procedures adapted to suit the needs of the different stages of recovery. This is outlined as follows;

- **Urgent Recovery** – combat response may still be ongoing during this time, and this needs to remain the main point of coordination. Emergency restoration of critical infrastructure such as electricity, telecommunications, water supplies and transport must have the highest priority. Rapid small-scale economic stimulus can be implemented at this time to help people recover quicker, but should have very few criteria for individuals and businesses alike, eg \$1,000 cash grants
- **Planned Recovery** – By this stage the combat response should be at or near completed, and a formal Recovery Committee established, along with sub-committees as required. There is the multi-agency gathering of damage and impact assessments, and key issues for the recovery plans and immediate actions should be identified and documented through the Recovery Committee forum. An early commitment to funding for essential infrastructure restoration including consideration of betterment needs to be made. Funding for the likes of small business grants, and medium term economic stimulus such as non-competitive grants for community infrastructure improvements with large scope that allows for range of local priorities to be considered (eg Australian Governments Local Roads and Community Infrastructure Program, NSW

Governments Local Government Recovery Program, and Community Local Infrastructure Recovery Program)

- **Resilience Recovery** – By now all short-term recovery needs are addressed. This is the time to look at long term infrastructure improvements and other recovery programs that can boost future resilience or remove future risks. These would be identified and delivered as part of an economic stimulus, such as the NSW Governments Community Local Infrastructure Recovery Program, or priority funding through other existing programs where projects can meet grant criteria. This should also include the likes of flood modification measures, and voluntary house purchases in the case of flood related events. This would then go hand in hand with specific targeted financial assistance to businesses and industries where there is strong evidence of impact, or a high need in recovery. For example, businesses that support the housing construction industry and associated supply chains in the case of the recent floods.

Addressing the Terms of Reference

1.1 Causes and contributing factors

Human beings have seriously altered the planet on which we live, and the many environments and ecosystems that it contains. In turn, we are now experiencing changes in the climate and weather patterns, which leads to more frequent and severe adverse events such as storms, floods, droughts and bushfires. There is an urgent need to adapt the way we manage our environment and our activities, to ensure that we are able to sustain our communities into the future. There would seem little doubt that land clearing and historic land use practices, along with a lack of riparian vegetation, has combined with the impacts of climate change, to deliver one of the most devastating flood and storm events in recorded history. Rather than debate the cause of any one particular event, it would seem more prudent to acknowledge that these types of events are going to become more frequent and more severe. This should then allow us to focus on what we need to do to adapt to this, and make our environment, infrastructure, and our communities more resilient to the effects of future events.

1.2 Preparation and planning

There has been a chronic lack of investment in preparedness and prevention over many decades. Investment in preventative measures such as voluntary house buy back schemes and flood modification measures, has been around 5-10% of the cost of repairing the ongoing damage, including the regional and local road networks, and bridges and causeways in particular.

Things have significantly improved over the last 3-5 years with the introduction of programs such as Fixing Local Roads, and Fixing Country Bridges, but much more is needed if the regions are to have resilient transport infrastructure that meets modern standards. The lack of build back better opportunities taken up in the past is also a point for frustration. These low resilience locations are all well known by local government, but there is very rarely an opportunity to make the necessary improvements. It was only as short a time ago as the 2017 flood event, where Council

found itself still having to justify building a replacement bridge out of concrete and steel, instead of the timber that the damaged structure was originally built from. Hard to believe that this situation still existed in the 21st century!

Funding for the planning and delivery of improved infrastructure to deliver long term community resilience is long overdue. This includes the following list of items;

- Improved coverage, reliability and resilience of telecommunications across the region, which still have significant black spots in key areas/transport routes, lack back up power on critical sites, and lack local repair/response capacity.
- Improved emergency operations centres, evacuation centres, and emergency services facilities. One of the major barriers for these facilities at present, is that local government is often left with the financial burden of providing suitable facilities, without the financial capacity to do so.
- Improved resilience in major transport routes, in terms of flood immunity, and availability of suitable alternative routes. This will require significant planning and investment, including in some key local freight routes to provide safe alternatives State/National roads, including QLD/NSW cross border planning.
- Transport resilience improvements at local level need to be funded so economic operations can bounce back quicker from future events, by investing in causeways, bridges, and unsealed roads used to access agricultural sector needs and timber resources, as these tend to be most affected with the longest duration for recovery.
- State and Federal governments need to implement an accelerated voluntary house purchase scheme that would consist of;
 - Removing the requirement for local government from making financial contributions to these schemes
 - Immediately priority being given to existing eligible and damaged houses
 - Looking at ways of fast-tracking eligible properties in existing programs
 - Expanding programs to include all flood affected residential properties to move people out of these areas
- Delivery of the remaining measures identified in existing Floodplain Risk Management Plans should also be accelerated, with additional funding from State and Federal Governments. One of the main faults in the existing program is the requirement for a local government contribution. This means that delivery of these initiatives is competing with a wide range of other services and priorities, for the very limited resources available. For Kyogle Council, we have around \$13 million of such initiatives identified across our villages, and if these need to wait for even a 20% share from Council funds, it will result in a long timeframe for delivery.

1.3 Response to floods

The overall coordination of the emergency services and supporting functional areas during the initial response period was efficient and effective. The SES in their lead combat agency role were well supported by the NSW Police Force and the other agencies through the Local Emergency Management Committee and Emergency Operations Centres that were established early in the event.

These types of events are often difficult to predict, and the messaging to the communities affected must be clear and regular, and acknowledge the changing nature of the situation. Communications during this most recent event were an improvement from the past, but there is still room for considerable improvement here.

Emergency services and combat agencies are doing the best they can. But their narrow remit, and the reliance on volunteerism, is seriously limiting the ability of these agencies to respond to the expectations of community and government. It may well be time for these agencies to become more professionalised, like NSW Fire and Rescue, who have retained firefighters rather than volunteers. There will always be a place for trained volunteers, but there needs to be a movement away from relying so heavily on volunteerism in such a critical service area. This may require these agencies to be restructured and reformed in a major way. The remaining emergency service organisation/s would need to be more flexible and integrated, allowing for their human resources to be utilised across multiple events, and avoiding the need for separate facilities and organisational hierarchies to support the delivery of services.

The Kyogle Council community managed action plan for emergency evacuation centres was tested during the recent bushfires and floods and found to be effective. This was an innovative project, led by Kyogle Council, to ensure local communities are more prepared and better able to recover from disasters that may isolate them from support agencies. It was rolled out across the Kyogle local government area earlier in 2019 in collaboration with a number of emergency management partners including the Red Cross, the Department Family and Community Services, and the SES along with other community organisations. to establish village groups to manage and set up temporary emergency evacuation centres.

The response shown by Essential Energy in relation to the electricity infrastructure restoration, showed the necessary urgency and was seen by most as responsive and efficient.

The telco's response to repairs and restoration of damaged telecommunications during and immediately post disasters seems to be very poor, and lacking in urgency. Every other agency was in and out of affected areas providing relief and restoring services, but the telco's seemed to be focused on finding excuses rather than solutions to restore services. This situation added to the impact of the events on the local community and response agencies, as their ability to communicate was severely constrained. The importance of telecommunications systems before, during and after emergency situations such as this year's flooding cannot be underestimated. We must put in place measures to ensure this is given the priority it deserves and build a robust system, with rapid response capacity.

Stream data and accessibility was hindered due to reliance on telco's to get access, and lags with data publication. There needs to be improved accountability, currency, and reliability/resilience of these essential response tools. There is also a need for a review of the existing installations to identify priorities for additional sites that would assist in flood response, as well as overall water quality and catchment management. It would also be a significant improvement if the gauging station sites were provided with 24-hour live CCTV of the manual gauges at each location, and on a separate system to the real-time data, so that there is always a source of up to date data on stream levels.

1.4 Transition from incident response to recovery

This is where things often seem to fall short. The teams that take over from the initial combat response agencies and personnel, often lack local knowledge or situational awareness, and there is a major loss of momentum between response winding down, and recovery winding up. This is not a symptom of the new Resilience NSW model or

structure. This issue has existed whether it was when Public Works took on this role, or when the NSW Police had it after them, or when this was led by the Office of Emergency Management, who preceded the current agency, Resilience NSW. For there to be any improvements in this area, there is a need for the agency responsible for recovery to be regionally based, and imbedded into the emergency management framework on an ongoing basis, including during response. There should be one agency, with the capacity and delegations to make decisions across a range of functional areas quickly. There is a need to review the broader emergency management coordination and agencies structures to ensure that the state has an effective, integrated emergency management framework into the future.

In the short term, there is always a critical need for government agency support for seamless transition from response to recovery. From the 2022 event, the following observations were made;

- Council was very thankful for the rapid roll out of the Local Government Recovery Grants program
- Transport for NSW responded well to initial discussions about the need for an additional cash injection early in the recovery phase to ensure Council has sufficient cash flow and funding to allow emergency repairs and priority restoration across the road network to continue
- Transport for NSW also responded well to discussions around the need for additional resources at both State and local level to administer the Natural Disaster restoration funding application and approval process, as this has led to delays in the progress of restoration works in the past
- Council raised the need to have a commitment early in the process for funding the Build Back Better opportunities that get identified along the way. In the past this commitment has been lacking, and many opportunities have been missed where improved resilience to future damage or improved flood immunity could have been achieved in a cost-effective manner. If there is a commitment from State and Federal Governments early, local government will be able to put together proposals, and we can also assess our capacity to contribute where needed. We are still waiting for the details, but there has been a significant commitment made to this betterment provision now.
- Council also raised the desire for an early commitment to improved flexibility in the delivery of currently funded grant programs, specifically time extensions of at least twelve months for the Fixing Country Bridges and Fixing Local Roads programs, as well a range of other government funded projects that would be difficult for Council to deliver while the massive restoration program was being undertaken. These are all important projects to the community, and it would not be fair for the external funding that makes these projects possible to be lost because an arbitrary timeframe was not met. These projects can also form part of the economic stimulus for the local economy, but the timing of delivery needs to suit the market at the time, and allow for maximum local content. They also compete for the limited internal resources available to Council, particularly while the infrastructure restoration is continuing. An ongoing commitment across all agencies that administer grant funding is needed to ensure that Councils affected by adverse events are not further disadvantaged.
- The transition from the complex and confusing arrangements of the multi-agency points of contact for the various forms of state government assistance, into the central funnelling of community and businesses through Services NSW

was very well received. However, there is still much more to do in this area to align state agencies and state and federal services. The Recovery Centres required multiple resources to assist community members with the state and federal assistance packages, which placed a further strain on resources to staff multiple locations. Ideally, there would be trained staff embedded in an organisation such as Services NSW and/or Resilience NSW that could provide a single point of contact for information across all agencies and tiers of government.

- The interruptions to internet access, combined with displacement and loss of important documents, also saw many people avoid, or give up on the application process for a range of financial assistance services. The response to this by way of door knocking and increased face to face contact by the support agencies was well received, albeit a little too delayed for the assistance available to have the maximum benefit.
- The establishment of multiple Recovery Committees across the affected region has often appeared to be an inefficient use of the limited available resources. When this is combined with long delays in the establishment of some of the sub-committees, the weaknesses started to appear, and actions and issues were not being addressed in a timely manner. Care must be taken in these situations to make sure that the recovery structure that is set up is able to be properly administered and resourced.
- Clear positions are needed on eligibility for NDRRA and various grants/financial support. But more importantly, where issues are identified that means the existing arrangements are not delivering the desired outcomes, then fast, clear decisions on changes are needed, which requires people at the table with appropriate delegations to respond/decide.
- An accelerated/alternate voluntary house purchase scheme is needed which is targeted towards those homes in the floodplain that have been damaged and need structural repairs. Where the owners would prefer to sell off the property rather than undertake the repairs, a rapid response and commitment from government is needed. This is of particular concern where this investment is eventually wasted when the property is purchased and demolished some years later, under the slow moving regular voluntary house purchase scheme. We have at least three of these in this situation in Kyogle, but there are many dozens of people in Lismore, Tweed and surrounding areas in a similar position.

It is possible to go back to the Recovery Committee and sub-committee minutes from the 2017 flood event, and see that many of the same issues that were being raised during the transition from response to recovery back in 2017, were still being raised in 2022. There is then the same delays experienced in obtaining responses to questions about eligibility and responsibility, and we lose many of the opportunities to act quickly and efficiently. We were assured that these lessons learnt back in 2017 would be brought out in the open with the Recovery Coordinators final report and recommendations. However, despite repeated requests, the final report was never released either publicly, or in a limited form for the agencies to review and respond to. This lack of follow up post event, and reluctance to acknowledge where things could be done better and learn from them, means that we are doomed to repeat the failures of the past.

1.5 Recovery from floods

Resourcing for recovery is also a problem. There is a lack of resources within the various state agencies, but also a lack of coordination and cooperation between those same agencies. Much passing the buck goes on, and many things are done without coordination with, or even reference to, the other agencies or local government.

Everyone involved is doing their very best as individuals, and the desire to help the community in the recovery process is clear. The complex multi-agency system we have set up in NSW, is the biggest barrier to the recovery process. However, the good news is that there seems to be enough resources available, if everyone worked together on the most immediate priorities in a coordinated manner. This may mean one agency having to help another one to do their job for a short period. If this can't be facilitated, then there needs to be less agencies, with those that remain given a broader scope to work across, much like the state has in place for local government.

Once the initial response period is over, and the transition to recovery has occurred, there is a need for flexible arrangements that maximise the local economic benefit and improved resilience from existing grants and programs, in combination with Natural Disaster restoration funding. The restoration works will always take precedent in terms of delivery, but it is often too late once this work has started, to include improvements or obtain betterment funding. There needs to be a ready framework in place for the consideration of such opportunities. These don't always have to be funded from a specific betterment fund or budget, as many such outcomes can be delivered by leveraging existing programs.

For example, Kyogle Council currently has funding applications in under the Fixing Country Roads program for improvements to the Clarence Way, which is a Regional Road that forms the key connection for the western areas of our LGA. We also have applications in for the remaining timber bridges under Round 2 of the Fixing Country Bridges Program, and another under the Fire Trails improvement program administered by the Rural Fire Service for the Mount Brown Road connecting the east and west parts of our LGA through State Forests and national parks.

All are strong applications supported by robust business cases, with critical outcomes for improved community and infrastructure resilience, and the approval of these projects are of the highest priority for Council. Approval of these grants would help lay the foundations for a strong locally led economic recovery and improved resilience to future natural disasters across the Kyogle LGA.

All can be funded from existing NSW Government programs, without the need for additional funding to be sought from Treasury. The local economic benefit can also be enhanced through greater flexibility in these programs around the delivery time frames, and need to contract out works in some circumstances, both of which limit the opportunities for involvement of local contractors supported by Council.

Council also has a housing proposal that would see the flood prone properties in the Kyogle township relocated to a flood free housing estate that is already approved. We have in principle support from a local developer, and are looking at a variation on the voluntary house purchase scheme that would see units built for temporary accommodation while the existing houses are relocated to new flood free land, provided with new floor coverings and painting. Then the families can move back in to their own home now located on flood free land, and at the end of the process the temporary accommodation can be transferred to North Coast Community Housing to be used for social and affordable housing needs.

This is expected to cost around \$30 million dollars for approximately 60 homes. This works out cheaper and faster than the longer-term costs of the existing voluntary house purchase scheme under current guidelines. This also retains the existing housing stock so as to not further add to the housing shortage already being experienced

In relation to the recovery process to date for the 2022 event, the following observations are made;

- There needs to be a strong focus on housing restoration supply chain, including support for local businesses, tradespeople, and industries in the housing supply chain to make sure support/grants etc are provided to these areas as a priority
- An early decision was made to extend the NDDRA emergency works timeframe until the end of December 2022, which was well received. There is a further request for an extended restoration period from two years to four years that will be critical in deliverability of the restoration works given the scale of damage across the region.
- There is a need for a whole of government approach to local government grant funding that would;
 - Allow local government to defer current funding projects/programs without losing access to grants and to avoid conflict with resources needed for restoration/recovery
 - Prioritise existing grant programs/applications for those local governments to allow for completion in three to five years to keep resources locally available and to help support growth of local businesses/economy/contractors
 - Provide non-competitive grants and long/medium term commitments to allow investment in project management resources and contractors/staff resources to be retained.
- Grant eligibility criteria in some cases do not appear suited to the Northern Rivers Region, or the people and businesses affected by the storms and flooding. For example;
 - Grants for Primary producers require that the person has no more than 50% off farm income. This may be suitable for the western areas of NSW where large scale agricultural enterprises account for the majority of the agricultural activity. However, while agriculture and forestry remain the largest input into the Kyogle LGA for example, this industry is made up of a large number of smaller producers. The majority of these people also have off farm income to remain financially stable, and this is often over 50% of the on-farm income. Rather than an arbitrary percentage of on and off farm income being used, eligibility in this region should be based on a means test of overall income instead. For example, if you are a primary producer and you total annual household income is less than a certain amount, then you are eligible. This could then be scaled back to reduce assistance available as income levels increase until a threshold cut off. The current system is inequitable, and leaves one of our most important economic sectors with little to no support. When this is compounded with the impact of multiple adverse events over the last few years with drought, bushfires, floods and storms, there is a real risk of this section of the economy collapsing under the effects of these adverse events, rather than recovering from them.

- The other is the return to home grants which were originally only available to those who have been inundated by flood waters. There is a considerable rural and rural residential population across the region which are not primary producers, but have had significant damage to access roads, and associated structures such as causeways and bridges. These people are not necessarily in the category of requiring temporary housing or food drops, but they are only able to access their homes by foot, or through a manner that puts them at risk. The return to home grants should be made available to these people, again, with a means test and income thresholds set to ensure that it is going to those that need it most.

1.6 Any other matters

As part of the longer term recovery and improved resilience for the region and the local government sector in regional NSW, there are a number of strategic partnerships and investments identified that would improve transport and housing needs, and provide increased financial capacity for local government.

There is a need to make a commitment now to the planning and coordination between the NSW and Queensland Governments to develop route assessment options that will see the Summerland Way and Mount Lindesay Highway provide a genuine b-double accessible alternative to the Pacific Highway from Grafton to Brisbane. This can also serve as the key economic link between the Scenic Rim and Southern Downs areas of south east Queensland and the Northern Rivers region in NSW. This is a long-term project, but there is a need for both states to commit to the development of a plan for the upgrade of this route, as this collaborative effort and investment in options development will result in a business case that will make it possible to attract significant Federal Government funding for delivery.

Council has applications in at the moment for the transfer of all Regional Roads under its control to the State Road network, which was done in collaboration with the neighbouring Councils under the NSW Governments Regional Roads Transfer and NSW Road Classification Review process. The transfer of the ownership and management responsibility for these roads to the State will provide Council with an annual improvement of around \$1.2 million dollars in its financial capacity, which would allow Council to invest further in its local road network, and partner with the State and Federal Government on other programs.

Council will always continue to be a capable partner in the delivery of works on the State Road network, as we have done for many years with the Summerland Way and Bruxner Highway. It would be of great benefit if the applications currently before the NSW Government's Independent Panel could be fast tracked and approved for the flood affected region. Our joint applications include Tweed Shire, Lismore City, Richmond Valley, Clarence Valley and Tenterfield Shire Councils across the current flood affected region, and this announcement would represent a commitment to their long-term future and ongoing partnership with the NSW Government in delivering transport services to our communities.

Kyogle Council has a serious housing shortage and affordability issues. There is very little social housing available, and very little funding to help Local Aboriginal Land Councils provide housing to the high aboriginal portion of the local population. There is ample Crown Land available to help deliver suitable land for affordable housing, but this is locked up in overly complex and bureaucratic processes that will only serve to keep this land locked up and unused for many decades to come. There needs to be a

significant change in the State Government legislation and policies to ensure these assets can be unlocked for the benefit of the Local Aboriginal Land Councils and the broader community, and their economic, social and environmental value realised.

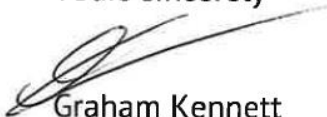
Kyogle Council is also still paying the EPA Waste Levy, despite the independent audit of the program undertaken by the NSW Government recommending that Councils like Kyogle Council were never intended to be captured by this tax placed on our struggling community. This tax paid by local communities back to the state government for placing waste in our own landfill facility, only serves to reduce the financial capacity of Kyogle Council to help provide services to its community, and increase our reliance on external grant funding. Council has been pleading with the NSW Government to drop Kyogle Council from this levy area as soon as possible, to help us to help ourselves.

There is also the ongoing issue with the Emergency Services Contributions (aka Levy). Council is not contesting the requirement to pay these contributions to the emergency services that we all rely upon, and value deeply. The problem is, these contributions are provided to the state from the restricted revenue Council is able to generate because of the rate pegging policy of the NSW Government. Rate Pegging is the single greatest restriction on the financial sustainability of local government in NSW, closely followed by this kind of cost shifting from the State to Local Government. While the obvious solution is removal of the rate pegging system, if this is not possible, then these contributions back to the state Government need to be considered outside the rate pegged permissible income. This would allow Councils to retain this income for services to their local communities, and reduce their dependence on external grant funding from the State.

The EPA Waste Levy and the Emergency Services Contributions, amount to 10% of the Kyogle Council permissible General Rates revenue, which is simply being paid back to the state. This then increases when you add on the Pensioner Concession funding gap, and many of the other cost shifting areas where local government helps to support the state government to provide services to regional communities in particular. This only serves to increase the need to rely on external grant funding, and is unnecessarily holding back communities in regional NSW.

These things are all intended to improve the partnerships between all tiers of government, and to help us, help ourselves. Thank you for the opportunity to provide input into the Independent Flood Enquiry. Should you have any further enquiries please do not hesitate to contact me during business hours on

Yours sincerely



Graham Kennett
General Manager