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Flood Inquiry Submission Portal
NSW Department of Customer Service
Sydney NSW 2000

Via email: inquiry@floodinquiry.nsw.gov.au
Thursday, 17 January 2019



NSW Flood Inquiry – Narrabri Shire Council Submission

Dear Sir/Madam

Thank you for the opportunity to provide feedback in relation to the NSW Flood Inquiry.

It is understood that the following terms of reference (ToRs) are applicable to the current review process:

1. *The Inquiry is to consider and report to the Premier on the following matters:*
 - a. *the causes of, and factors contributing to, the frequency, intensity, timing and location of floods in NSW in the 2022 catastrophic flood event, including consideration of any role of weather, climate change, and human activity;*
 - b. *the preparation and planning by agencies, government, other entities and the community for floods in NSW, including the accuracy and timing of weather forecasts, current laws, emergency management plans, practices and mitigation strategies, their application and effect;*
 - c. *responses to floods, particularly measures to protect life, property and the environment, including:*
 - i. *immediate management, including the issuing and response to public warnings;*
 - ii. *resourcing, coordination and deployment, including with respect to the Australian Defence Force; and*
 - iii. *equipment and communication systems;*
 - d. *the transition from incident response to recovery, including the roles, structure and procedures of agencies, government, other entities and the community;*
 - e. *recovery from floods, including:*
 - i. *immediate housing, clean-up, financial support and community engagement measures; and*
 - ii. *longer-term community rebuilding support; and*



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f. any other matters that the inquiry deems appropriate in relation to floods.

2. And to make recommendations arising from the Inquiry as considered appropriate, including on:

a. safety of all emergency service personnel and community first responders;

b. preparation and planning for future flood threats and risks;

c. use of flood gauges and other warning structures and/or strategies for improved flood prediction;

d. impact on essential services, including electricity supply, water supply and telecommunications;

e. land use planning and management and building standards, including:

i. the instruments, policies and programs applying to existing development in flood prone locations across NSW; and

ii. the instruments, policies and programs applying to proposed future developments in flood prone locations across NSW;

f. appropriate action to adapt to future flood risks to communities and ecosystems;

g. coordination and collaboration by the NSW Government with other state and territory governments and local governments; and

h. public communication and advice systems and strategies.

Local Context

Narrabri Shire is a local government area in the North West Slopes region of NSW. The primary settlement of Narrabri is located adjacent to the Namoi River and at the confluence of the Newell and Kamilaroi Highways. The local government area (LGA) is strategically positioned halfway between Sydney and Brisbane, and is considered to be resource-rich. Key local industries include mining and agriculture. At the last census (2016) the resident population was 13,084 persons.

Narrabri is considered to be one of the most flood prone settlements in NSW. The community of Wee Waa, located west of Narrabri, is periodically completely isolated by flood waters for long periods (up to two weeks) and is protected by a ring levee. Narrabri Shire contains a number of vulnerable and at-risk communities that are flood-

affected. These communities have a high Aboriginal population, low socio-economic base and are also ageing in nature.

Narrabri Shire Council's vision is articulated in the Community Strategic Plan as follows:

"Narrabri Shire will be a strong and vibrant regional growth centre providing a quality living environment for the entire Shire community."

Narrabri has been recently announced as a special activation precinct (SAP) location. The master planning process for Narrabri is currently underway by NSW Department of Planning and Environment (DPE). Through the SAP process it is anticipated that energy-intensive industries and manufacturers, such as plastics, fertilisers and construction material producers will be able to confidently set up in Narrabri with access to commercial quantities of domestic market gas, enabled by the Narrabri Gas Project.

The precinct will also leverage key infrastructure such as the Inland Rail, the Narrabri West Walgett Railway line and the proposed Narrabri Industrial and Logistics Hub to give investors access to global supply chains and markets. Further information in relation to the Narrabri SAP is available via:

<https://www.nsw.gov.au/snowy-hydro-legacy-fund/special-activation-precincts/narrabri>

This submission will focus on Narrabri Shire Council's experiences during and post the recent major flood event of November 2021. This submission has been prepared in conjunction with Council's Flood Plain Management Committee.

The causes of, and factors contributing to, the frequency, intensity, timing and location of floods in NSW in the 2022 catastrophic flood event, including consideration of any role of weather, climate change, and human activity;

The causal elements and contributing factors to flooding are considered to be well acknowledged. Ongoing focus is needed on improving community resilience and adaptivity to deal with more frequent and climatic events of increasing severity. The increasing frequency and intensity of extreme weather events are expected to further erode Australia's adaptive capacity.

The preparation and planning by agencies, government, other entities and the community for floods in NSW, including the accuracy and timing of weather forecasts, current laws, emergency management plans, practices and mitigation strategies, their application and effect;

Greater attention is required in respect of planning and preparatory activities to improve community resilience for flood events. The following specific recommendations are made in this regard:

- Technical assistance and support is urgently required to Councils and Local Emergency Management Committees (LEMCs) in the updating of EMPLANS, including the review and assessment of the suitability of Consequence Management Guides (CMGs).
- Greater alignment is needed to the emergency management framework and Council's Integrated Planning and Reporting (IP&R) framework, particularly Community Strategic Plans (CSPs).
- Ongoing investment in support for LEMCs, particularly in respect to funding.
- Targeted community-awareness raising programs. There is a general lack of understanding of the risks of building on flood prone land.
- Creation of a suitable funding pool for flood mitigation and recovery that is specifically available for businesses and the commercial sector.
- The investment of targeted training for Council personnel, particularly in respect of Town Planners, Building Surveyors and Engineers, similar to that progressively conducted in respect to the management of bush fire risks.
- Improving inter-agency cooperation. During the recent major flood event in Narrabri, Council provided access to its flood management software WaterRIDE to the local NSW State Emergency Service (SES). This resulted in improved response outcomes throughout the duration of the event. Council has recently invested in providing further training in the use of the software to local officers within the NSW SES (at its own cost) and is also investigating additional licensing opportunities to enable ongoing data access. Support is sought in this regard from the NSW State Government to the purchase of additional licenses and development of more formalised training framework in the use of the flood modelling software.

- Greater, and unfettered access, to climate modelling by local government is sought to improve local understanding of potential impacts and to improve local planning outcomes.
- Council is aware of prediction disparities across the border regions with significant variance in predicted flood height and application of BOM data causing confusion within those border communities.
- Further investment in flood management studies and strategies is urgently required. Council has recently made an application to the NSW Department of Planning and Environment (DPE) for a Flood Study and Risk Management Plan for the rural settlement of Gwabegar which was recently severely impacted by the last major flood event. The NSW Government support to funding and delivering this important body of work is sought.
- The NSW State Government is encouraged to work collaboratively and as a proactive bipartisan approach with Federal Government in the development, establishment and delivery of a sustainable funding model focused on key priority actions within the emergency and disaster management lifecycle: Prevention, Preparation, Response and Recovery. Efforts should be made for the prompt and equitable distribution of funds on a community risk-based approach.
- Additional investment in NSW SES resources and training is urgently sought including training opportunities for swift water rescues and associated accreditation.
- A lack of clarity exists with Resilience NSW, particularly the agency's role, current protocols and associated terms of reference.
- A focus on funding and delivering local priority flood mitigation projects including the:
 - Draft Narrabri Flood Study and Risk Management Plan recommendations;
 - Extension of Wee Waa Lagoon bridge;
 - Augmentation and establishment of strategically located flood evacuation centres within the communities of Wee Waa and Narrabri; and
 - Wee Waa (ring) levee upgrade project.

Responses to floods, particularly measures to protect life, property and the environment, including:

- ***immediate management, including the issuing and response to public warnings;***
- ***resourcing, coordination and deployment, including with respect to the Australian Defence Force; and***
- ***equipment and communication systems;***

The NSW SES response, within its capacity of the relevant combat agency, is considered to have been highly effective with the Narrabri Shire community. Local officers of the NSW SES have an excellent appreciation of flood behaviours and possess an in-depth knowledge of their communities. Any subsequent reforms as a result of this Inquiry should ensure that this capacity, nor the importance of the available knowledge-base, is not diminished nor ignored. A degree of local autonomy must remain in place.

Excellent further potential exists for the sharing of equipment and resources locally. The current NSW SES facility within Narrabri is considered to be an ageing asset and is no longer fit for purpose. The current facility is also located on flood-prone land. Support is therefore requested to the establishment of a modern facility as part of the proposed Narrabri Emergency Services Precinct which will be located adjacent to the Narrabri Shire Council Depot in West Narrabri.

The transition from incident response to recovery, including the roles, structure and procedures of agencies, government, other entities and the community;

The transition to response to recovery is considered to be significantly clouded by the advent of Resilience NSW as a new agency operating in the emergency management space. Council did not elect to establish a Flood Recovery Committee for the most recent flood event(s) on the basis of the following:

- Transfer of historical recovery responsibilities from the state government to local government as a further 'unfunded mandate'.
- No availability of support funding for this activity. Administrative responsibility would have been wholly borne by Council with no ability to recover costs.
- A general lack of clarity around roles and responsibilities. With the introduction of Resilience NSW, a significant 'muddying of the waters' has occurred, with historically clearly defined and well-established structures and protocols put in place via the Office of Emergency Management no longer being available. This

has, in turn, raised expectations and created confusion within the community in terms of Council's function and role as part of the emergency and disaster management cycle.

Recovery from floods, including:

- ***immediate housing, clean-up, financial support and community engagement measures; and***
- ***longer-term community rebuilding support; and***

Refer preceding commentary. Opportunities exist to provide greater volunteer organisation support to the Department of Communities and Justice (DCJ) to improve local recovery outcomes. Additional support is required to flood affected communities in respect of suitable emergency accommodation both during and post-disasters. The establishment and appropriate resourcing of community recovery centres ('disaster centres') with the view of providing face-to-face support to communities is strongly supported.

Any other matters that the inquiry deems appropriate in relation to floods.

The current disaster declaration process requires urgent review in consultation and partnership with the insurance industry as it does not meet contemporary industry and community needs and expectations. Recovery funding is not timely, and on some occasions taking years for reimbursement creating further financial burdens on already stretched local government organisations. The funding application and approval process is complex, and the recent involvement of Resilience NSW in this process, as per NSW Natural Disaster Essential Public Asset Restoration Guidelines, has created a layer of additional uncertainty which requires urgent resolution. Community assets, particularly rural roads, continue to deteriorate at an exponential rate with no funding available to repair the assets until funding delivered. Urgent action is needed.

It is acknowledged that 97% of government funding is currently focused on recovery and only 3% is focused on prevention and preparedness. The insurance industry and economists (including Deloitte Access Economics) predict that the cost of natural disasters in Australia could increase to \$94 billion per annum by 2060. Immediate action is required to address the funding model and provide greater focus on adaptation, mitigation and preparedness. A corresponding focus on 'building back better' must be introduced to improve the reliability of infrastructure and flood affected community assets.

The results of the 2015 Productivity Commission Review into Natural Disaster Funding Arrangements are also acknowledged. The Commission's series of recommendations needs revisitation and review.

Safety of all emergency service personnel and community first responders;

Refer preceding commentary in relation to:

- Increased, targeted community education programs regarding flood preparedness.
- A greater focus on targeted and community-specific training programs for Council staff, emergency service personnel and first responders.
- Allocation for funding and equipment utilising a community risk-based focus.

Preparation and planning for future flood threats and risks;

Refer corresponding commentary throughout this submission specifically in relation to provision of additional support in respect of flood plain management planning and required technical support. It should be further noted that like most rural and regional local government organisations, Council has limited capacity to participate in voluntary purchase (VP) schemes that currently require a 2:1 funding ratio.

Use of flood gauges and other warning structures and/or strategies for improved flood prediction;

Accuracy of local gauges can be questionable (particularly the new Glencoe Gauge). The siting of gauges needs to be carefully considered taking into account local knowledge.

Impact on essential services, including electricity supply, water supply and telecommunications;

Flooding can create significant disruption to local utility and telecommunications services. The recent widespread flooding event(s) demonstrated the vulnerability of such systems and the need for further investment in more resilient infrastructure that can withstand and tolerate events of increasing severity.

Narrabri Shire Council already experiences extremely poor telecommunications coverage. This particular issue has been identified as a considerable community risk and requires urgent attention.

Land use planning and management and building standards, including:

- ***the instruments, policies and programs applying to existing development in flood prone locations across NSW; and***
- ***the instruments, policies and programs applying to proposed future developments in flood prone locations across NSW;***

It is considered that the land use planning framework is sufficiently robust following the recent extensive review process, however, a lack of community understanding of the implications of the Policy remains. Ongoing community engagement and awareness-raising in this space is required.

In this regard, Narrabri Shire Council currently makes available flood certificates via its WaterRIDE flood modelling program subscription to a range of stakeholders upon application to Council. These certificates provide a range of property-specific information to improve local decision-making and have proved to be an invaluable resource for local land use and strategic planning processes.

Ideally, flood data should be made publicly available and accessible via a web-based portal (similar to bush fire mapping), to improve community awareness of risks and to improve local planning outcomes.

Appropriate action to adapt to future flood risks to communities and ecosystems;

Further investment is recommended in preserving green space adjacent to riparian areas. This particular long term investment in vegetated areas will improve flooding resistance over time and requires formal recognition in flood planning processes.

Coordination and collaboration between the NSW Government and the Australian Government;

Refer preceding commentary and a need for a proactive, bipartisan approach with a community risk-based focus.

Coordination and collaboration by the NSW Government with other state and territory governments and local governments; and

Refer preceding commentary.

Public communication and advice systems and strategies.

Refer preceding commentary.

Should you have any questions or require any further clarification, please do not hesitate to contact the Strategic Planning Team on

Yours faithfully,

A handwritten signature in black ink, appearing to read "Ausling". The signature is written in a cursive style with a large initial letter.

Donna Ausling
Director Planning and Strategy