

**From:** [NSW Government](#)  
**To:** [Flood Inquiry](#)  
**Subject:** Floods Inquiry  
**Date:** Friday, 20 May 2022 4:17:02 PM  
**Attachments:** [WSROC Submission to the 2022 NSW Flood Inquiry FINAL.pdf](#)

## Your details

Title	Ms
First name	Judith
Last name	Bruinsma
Email	
Postcode	2148

## Submission details

I am making this submission as	Other
Submission type	I am submitting on behalf of my organisation
Organisation making the submission (if applicable)	Western Sydney Regional Organisation of Councils (WSROC)
Your position in the organisation (if applicable)	Project Coordinator
Consent to make submission public	I give my consent for this submission to be made public

## Share your experience or tell your story

---

## **Terms of Reference (optional)**

The Inquiry welcomes submissions that address the particular matters identified in its [Terms of Reference](#)

---

## **Supporting documents or images**

---

---

### **Attach files**

- [WSROC Submission to the 2022 NSW Flood Inquiry\\_FINAL.pdf](#)
-



## **SUBMISSION:**

### **2022 NSW Flood Inquiry**

---

Western Sydney Regional Organisation of Councils Ltd.

**May 2022**

# 1. About WSROC

The Western Sydney Regional Organisation of Councils (WSROC) represents local councils in the Greater Western Sydney region, including Blacktown City Council, Blue Mountains City Council, Cumberland City Council, Hawkesbury City Council, Lithgow City Council and Liverpool City Council.

With a reputation for considered policy analysis and bipartisan advocacy, WSROC brings a collective voice to those issues which are crucial for Greater Western Sydney's growing population.

WSROC welcomes the opportunity to provide a response and submission to the *2022 NSW Flood Inquiry*.

This submission is prepared on behalf of WSROC member councils. Some of our councils will make their own submission. This document should be viewed in addition, and complimentary to those responses.

WSROC would welcome an opportunity to further discuss this submission. Should there be any questions, please do not hesitate to contact WSROC CEO, Mr Charles Casuscelli on [REDACTED]



**Charles Casuscelli RFD**  
**CEO**  
**Western Sydney Regional Organisation of Councils.**

## 2. Introduction

### Impact on Western Sydney

Greater Western Sydney was hit hard by the 2022 floods. Several WSROC member councils experienced severe flooding, flash flooding, and the impacts following extreme rain events. Of particular mention are Hawkesbury City Council, Liverpool City Council and Blue Mountains City Council.

WSROC acknowledges the immense toll and effort by staff across councils in the lead-up, during and after the event.

#### **Case study: Hawkesbury City Council**

Flood events such as that experienced in March 2022 demonstrate a whole of Council response is required to preparedness, response and recovery.

For example, communications staff working 24-hour days during the event in order to keep the community informed and updated.

Additionally, operational and customer service staff had a period of 4 weeks of significantly increased hours in order to provide services and information to the community during the event and in the early recovery stage.

While the current Inquiry focuses on the 2022 flood events, WSROC highlights the cumulative escalating impacts on councils and their communities following consecutive disasters: the 2019/20 bushfires, COVID pandemic and the 2020, 2021 and 2022 floods. This has had a critical impact on local governments' ability to respond to the 2022 flooding events and should be taken into account as part of the current Inquiry, and considered in a more holistic review of current emergency management arrangements.

### The critical role of local government in emergency management

WSROC notes that some of the less desirable outcomes of the NSW response to the floods have their roots in policy and practices spanning multiple decades.

The recent NSW Bushfire Inquiry report was a missed opportunity to acknowledge and review the role of local government in emergency management. Yet, despite lessons learned from over fifty NSW

councils during the bushfire emergency, only one of the 76 report recommendations was directed to local government.

Grass-root involvement, particularly in disaster preparedness and recovery is critical, yet the roles of local government under the current NSW emergency arrangements are unclear, unfunded, and as a result, fail to integrate local context.

We strongly encourage the NSW Government to ensure learnings from the NSW Bushfire Inquiry are taken into account for the current NSW Flood Inquiry. WSROC encourages the NSW Government to enable the NSW Flood Inquiry 2022 to take a deeper look at the NSW emergency arrangements and how they contributed to the management of the flood emergency. This would provide valuable insights into the reforms needed for NSW emergency management for bushfires, floods and other hazards.

WSROC recommends that NSW emergency arrangements are assessed to determine whether they remain fit for purpose in guiding emergency prevention, preparedness, recovery, and response in the Greater Sydney Metropolitan Area.



*Figure 1 - Springwood Road disrupted by Yarramundi River, Hawkesbury City Council*

### 3. Recommendations

#### General comments: emergency management arrangements

Many of the areas suggested for improvement below are structural in nature and will therefore affect preparedness, response, and recovery capabilities across all hazards.

**1. There is a need for clearer leadership and coordination from the NSW Government to better prepare NSW for emergency and catastrophic events.** This should include delivery of effective programs that:

- Promote community resilience in the true sense of the concept.
- Ensure that the most effective capabilities are developed in preparation for, and in response to emergencies, by maintaining focus and momentum.
- Effectively influence planning so that better resilience outcomes are achieved.

**2. Review the current emergency arrangements to assess whether they remain fit for purpose in guiding emergency response in the Greater Sydney Metropolitan Area.**

- Responses to emergencies in the Greater Sydney Metropolitan Area, generally do not follow the processes indicated in the NSW State Disaster Plan, associated Sub-Plans and protocols. For example, the escalation process described from the local, through to regional and then state level emergency management, sounds good in theory, but more often than not, does not reflect reality.
- Review the roles and responsibilities of State, Regional and Local Emergency Management Committees to ensure each emergency management level is dealing with issues appropriate to their scale and collectively are making the best use of time and resources.
- Review the resourcing and placement of Regional Emergency Operations Centres. For example, current Centres are based on the boundaries of police administrative areas rather than operational considerations in response to place-based hazards.
- Investigate the current capabilities and interoperability between the local, state and regional operations centres. This includes how these operations centres provide mutual support, and the contingency arrangements for one to take over the functions of another that has been impacted by the emergency.

- Consider the underrepresentation of local government in emergency management arrangements, and how this contrasts with the extensive role councils are required to play in practice.

**3. Revise emergency management arrangements to include a stronger focus on building community resilience.** Despite strategic acknowledgement of the importance of resilience building, current emergency management arrangements (and associated resourcing) remain strongly focused on emergency response, and to a lesser extent, recovery.

**4. Review the role of local government in emergency management, and develop resourcing, plans and protocols based on requirements.** Local government is a valuable partner in emergency management, particularly in preparation and recovery efforts however, the *2020 Royal Commission into National Natural Disaster Arrangements* found local governments require further resourcing to fulfill their emergency management obligations across all hazards. This equally applies to NSW emergency management arrangements. The ability for local government to recover from significant disaster events needs to be considered in full; including resourcing, skills and the capacity of local government to continue to provide essential services and carry the burden of restoration of public infrastructure. WSROC recommends that the NSW Government consult with councils to better understand what resourcing, plans and protocols are required, including:

- Investigate the relative level of exposure of different local government areas to various hazards, in terms of scope, scale or intensity, this needs to be reflected in Emergency Management Plans.
- Investigate the actual involvement of local government staff, assets, and infrastructure in the full spectrum of emergency management. Local government is now far more active than they have been in the past. As highlighted in the case study above, other council functions including communications, facilities managers, community development, waste managers and civil works staff play a significant and essential role in disaster preparedness, response and recovery. Notwithstanding, approaches vary greatly between LGAs. There is a need to develop clarity around what set of optimum capabilities councils should develop, this should be supported by the Commonwealth and NSW Governments.
- Introduce sustainable funding models for dedicated disaster/emergency management resources. While local government plays a critical grassroots role in emergency management, most Local Emergency Management Officers (LEMOs) are part time positions that require



support. WSROC notes that some councils have sought approval from the NSW Government to introduce a levy to assist in resourcing full time disaster/emergency management staff to coordinate preparedness, response and recovery. These requests have not been supported by the government. It is critical that councils are appropriately resourced in their work, as such, models like those in Queensland, where full time disaster coordinators are funded and employed by each council, should be considered.

- Extend training programs on emergency planning and response for local government staff. This should extend beyond Local Emergency Management Officers (LEMOs) to include staff of local facilities such as libraries and leisure centres, rangers; who are often required to play a critical frontline role during times of emergency.

## Prevention

- 5. Limitations of the NSW Flood Prone Land Policy/Floodplain Development Manual.** The Flood Prone Land Policy and supporting Floodplain Development Manual applies state-wide and is therefore limited by its 'one size fits all' approach. In addition, the current model shifts the responsibility of the management of floodplains onto local government. Councils are cognisant of the unique and particular characteristics of the floodplain/s within their local government areas, however, are restricted by State Government Policy. In the case of the Hawkesbury-Nepean Valley, councils have been waiting since 2017 for the preparation and release of the Strategic Land Use Framework by the NSW Government which will have a significant effect on land use planning across the floodplain, and until this is released, councils are effectively unable to proceed with further land use planning.
- 6. Review the allocation of grants for building community resilience.** The allocation of limited funding to projects that seek to enhance community resilience requires review to ensure projects deliver ongoing, long term, value.
- 7. Increased resourcing, stronger guidance and frameworks are required to support local government in their risk assessment and associated mitigation of major threats.** This should be supported by those public sector agencies that have statutory responsibility for the relevant risk environments.

## Preparedness

8. **Consecutive disasters meant people were better prepared for the 2022 floods, but this level of preparedness must be maintained.** Based on work from various agencies including councils, and the experiences of the flood events in February 2020, and March 2021, the Western Sydney community both knew about, and were better prepared for, the 2022 flood event. Higher levels of preparedness were particularly evident from a decrease in swift water rescues compared to previous events, and the extent of damage not being as bad as was experienced in previous events. While there is opportunity to build on this knowledge to increase preparedness, the rapid population growth in Western Sydney means that ongoing resourcing and collaboration will be required to ensure preparedness levels are maintained and improved.
9. **Conduct regular audits and updates to River Height Gauges, and expand the current network.** River Height Gauges provide a valuable source of information to the community and emergency response agencies, particularly in terms of bridge heights and planning for when these bridges may close and reopen. A number of existing gauges within the Hawkesbury River failed during the March 2022 flood event, and as such the ability for the community and response agencies to have the benefit of data from these gauges to plan and prepare was significantly diminished. Additionally, there is a need for further river height gauges in various other locations, including South Creek, Grose, Colo and Macdonald Rivers.



*Figure 2 - Bells Line of Road at Richmond, Hawkesbury City Council*

## Response

**10. Improve information provision during emergency events.** The accuracy and timing of predictions proved to be problematic on a number of occasions, as did the lag in communication of predictions and issuing of warnings by the SES, with new BOM predictions being issued that almost immediately superseded the SES warnings.

- Staffing levels within the Bureau of Meteorology should be considered. Whilst the efforts of staff are recognised, the pressures on predictions and timely advice prior to and during flooding events is an intense period where appropriate staffing levels would assist greatly.
- It is also considered that the provision of visual mapping with each warning and evacuation would assist the community and agencies quickly and easily understanding the area that the warning or evacuation order relates to. Currently the written description of these warning and evacuation areas is not easily understood.

**11. Building resilience into telecommunications and power networks.**

- The vast majority of communications during the event was in electronic format (Hawkesbury Disaster and Emergency Dashboard, social media, etc.) which provides, as much as possible, real-time information and updates based on the latest information. There are however significant areas that either have no telecommunications, or where connections were severely disrupted during flood events, which should be addressed.
- Many areas suffered loss of power, and there was a lack of communication regarding when power would be cut, with several areas cut off for up to nine to ten days. This resulted in additional significant impacts such as the ability to use running water or flush toilets, particularly for properties that rely on pumps for connections to water and sewer services.

**12. Improve and maintain evacuation routes and improve communication around timings and bridge closures.** Whilst it is noted that the NSW Government is currently commencing the Hawkesbury-Nepean Valley Road Resilience Program, the need for upgrades to evacuation routes, effective coordination, and identification of clear responsibilities, cannot be stressed highly enough.

- The standard and maintenance of these evacuation routes was found to be wanting in a number of instances, and as a consequence, either failed the community or were problematic when most needed.

- Additionally, community feedback highlights that there is a lack of clarity regarding who controls the closure of bridges, when the bridges are closed, and how that is communicated to the community. There is a need for greater certainty around the timing of bridge closures.



*Figure 3 - Windsor Bridge, Hawkesbury City Council*

## Recovery

### **13. Review the response (particularly) timeliness of NSW Government agencies that manage specific components of the flood response.**

- NSW agencies, including those that do not act as first or major responders, should work with councils to review and improve preparedness and responses for future emergencies to ensure critical services to residents and business are disrupted to a minimal extent.
- Some critical services, such as household waste services faced significant disruption and the lack of state level coordination and contingency was inadequate. Leaving councils to solve critical service problems in parallel and in competition with each other was disappointing and needs to be resolved for future events. In this example, stronger coordination between councils and the NSW EPA was required.

#### **Case study: Hawkesbury City Council**

Kerbside waste collection services were disrupted by the floods due to a range of factors including isolation of communities. Loss of access, staffing constraints and increased waste transport distances were issues experienced. During the loss of access across the river, putrescible waste was transported to and disposed of at Lithgow City Council's Waste Management Facility. The increased travel times contributed to and compounded the disruption of scheduled services. This has been identified as an ongoing business continuity risk. Support for alternative temporary options in such circumstances is needed.

### **14. Ensure councils are well-briefed on response and recovery initiatives to support community engagement outcomes.** During the flood emergency, the NSW Government made numerous announcements about community support packages and initiatives. While these packages were very much welcome, many came as a surprise to local government and at times with little detail. This created community engagement challenges for councils, at a time when staff were already fielding an extensive number of queries.

### **15. Review the nature and process for the distribution of Disaster Recovery Funding to local government.** Current funding arrangements have created challenges for disaster recovery in both the nature of funding provided and processes through which it is distributed. The amounts offered to repair facilities and infrastructure does not allow local government to build back better. Further, the timeliness of funding delivery has seen councils experience repeated and increasing



infrastructure and asset damage following consecutive disaster events. In some instances, funds have been received after a secondary disaster that compromises the ability of councils and their contractors to plan recovery works to deliver optimum outcomes. As such, WSROC recommends:

- Funding approval mechanisms be reviewed, in consultation with local government, to improve efficiency in releasing funds to councils so that critical infrastructure repair can proceed as soon as possible
- Disaster Recovery Funding packages be revised to ensure local government can build back better and thus improve resilience to future disasters.
- Disaster Recovery Funding packages be revised to allow local government to seek funding for staff resources to manage project delivery where the scale of repairs exceeds the capacity of existing staff to deliver.



*Figure 4 - Megalong Road, Blue Mountains City Council. Source: [www.bmcc.nsw.gov.au](http://www.bmcc.nsw.gov.au)*

**16. Ongoing Local Government Emergency Recovery Support Group.** WSROC and councils acknowledge the valuable contribution by the Office of Local Government in the coordination of council-to-council support for disaster-affected local governments in New South Wales. The provision of flood clean-up, machinery, development assessment and customer service support was critical to recovery efforts. WSROC recommends that this role by the Office of Local Government is embedded in emergency management practices to enable the Local Government Emergency Recovery Support Group (or similar) to assist in future events.



**17. Enable access to affordable insurance.** In recent years there has been increased evidence of the significant increases to insurance premiums for property owners across the Hawkesbury-Nepean Valley. Premiums of \$20-30,000 per year are becoming common, and in some instances, insurance is not being offered at all by insurance companies. The inability for property owners to access affordable and reliable flood insurance is a significant issue in terms of resilience. This is a critical issue which requires addressing on a wider basis, for example a government backed scheme that supports property owners to access insurance for flood.

**18. Investigate Riverbank Restoration programs to promote increased resilience to future events.**

The process associated with riverbank restoration is not done well, with a confusing myriad of regulations and responsibilities by varying agencies. With consecutive flood events in 2020, 2021 and 2022, delays in adequate bank restoration has compounded land and infrastructure damage within the Hawkesbury-Nepean River System. Waterways management on private property is also an area that needs to be considered, both in terms of the ability and capacity to undertake regular maintenance of these creek systems to prevent issues during flood events.



*Figure 5 - Riverbank collapse threatens road infrastructure, Freemans Reach Road Hawkesbury City Council*

For further enquiries with regards to this submission please contact:

## Contact

Charles Casuscelli RFD, Chief Executive Officer

Western Sydney Regional Organisation of Councils Ltd

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[www.wsroc.com.au](http://www.wsroc.com.au)