

# Draft Natural Hazards Package: Submission from Penrith City Council

Penrith City Council (Council) thanks the NSW Department of Planning, Industry and Environment (DPIE) for the opportunity to provide feedback on the Proposed Natural Hazards Package including the Draft *Planning for a more resilient NSW: Strategic Guide to Planning for Natural Hazards (The Guidelines)* April 2021 and *Toolkit*. Council offers the following responses to the package:

*The Guidelines* take a systemic perspective of the key considerations for addressing natural hazards in strategic land use planning. Council supports this view, which aligns with our approach to risk management and is reflected in our *Local Strategic Planning Statement (LSPS)* and our progress on the actions under 'Our Environment', 'Our Sustainability' and 'Our Resilience' within the LSPS. Our comments and recommendations in response to *The Guidelines* are as follows:

## THE OVERVIEW

The Overview would benefit from information regarding increasing climate risk, exposure and the rising costs of disasters.

It is clear *The Guidelines* have been informed by extensive technical research and consultation. It would be useful to have an overview of these inputs in a section on 'methodology'.

For instance, *The Guidelines* emphasise the need for community engagement in planning for natural hazards. It would be helpful to understand how DPIE have engaged with the community and key stakeholders in developing the Guidelines.

The overview should also clarify next steps and implementation, such as how *The Guidelines* will be integrated into planning instruments, including local planning instruments.

### Recommendations:

- That the Overview include contextual information around climate risk, increasing vulnerability and exposure and the rising costs of disasters in NSW.
- That the Overview include the methodology for developing *The Guidelines*, including who was consulted and how the community was involved.
- That the Overview include an outline of next steps, implementation and how *The Guidelines* should be integrated into planning instruments, including local planning instruments.

## THE GUIDING PRINCIPLES

The Guiding Principles take a systemic perspective in considering the facets of planning for natural hazards. However, council seeks clarification around which principles are to be prioritised, particularly in cases where there is a conflict between principles.

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## Recommendations:

- That *The Guidelines* specify which Guiding Principles are to be prioritised, particularly where there is a conflict between principles.

Council welcomes the inclusion of Guiding Principle 5 which outlines the importance of emergency response and evacuation. Council notes this guidance supports our efforts in advocating for safe evacuation for residents of the Hawkesbury Nepean Valley via the Castlereagh Connection. The Guidelines state:

'For example, if the community has several transportation pinch points that make emergency response difficult under ideal conditions, the plan needs to consider the implications to the population if these existing pinch points are put under additional pressure during a disaster event.' (Dept of Planning, Industry and Environment, 2021, Draft *Planning for a more resilient NSW: Strategic Guide to Planning for Natural Hazards*' NSW Government, p. 9)

The final point under 'Key considerations' encourages planners to ask:

'Is more than one transit route provided in different directions to ensure people do not become trapped in a locality?' (Dept of Planning, Industry and Environment, 2021, Draft *Planning for a more resilient NSW: Strategic Guide to Planning for Natural Hazards*' NSW Government, p. 10)

A strategic business case for the Castlereagh Connection would explore these issues in detail, and the potential for the project to address current evacuation challenges and community risks.

## Vulnerability:

It is important planners understand demographics of existing communities to identify the level of risk to certain vulnerable populations. For instance, the needs of different age groups and those for whom English is a second language should be considered. It is also important to anticipate trends for future communities.

Planners should use socio-economic mapping tools and high-quality data such as the ABS Socio-Economic Indexes for Area (SEIFA).

*The Guidelines* should clarify how planners can work with combat agencies and vulnerable people to ensure processes consider:

- How vulnerable people, including people living with disabilities, their carers, people in aged care facilities and school children will evacuate at different times of the day.
- The location of evacuation centres, to ensure there is an accessible evacuation centre in each local government area.

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Furthermore, there should be a clearer focus on planning for people who will experience economic impacts from natural hazards events such as loss of livelihoods. For self-employed people, small business owners and communities living in rural areas as well as those working in construction and other industries, insurance may not cover damage to, or loss of tools, grazing impacts and other business impacts.

## Recommendations:

- That *The Guidelines* clarify how planners, combat agencies and vulnerable people can work together to ensure processes consider evacuation for vulnerable people, including the location of accessible evacuation centres in each local government area.
- That *The Guidelines* specify that planning processes should consider economic vulnerability and hardship from impacts to self-employed people and small business owners.
- That *The Guidelines* highlight the importance of considering the needs of vulnerable people and demographics including those for whom English is a second language and different age groups
- That *The Guidelines* recommend planners understand existing vulnerabilities and future trends
- That *The Guidelines* recommend planners use socio-economic mapping tools and high quality data such as the ABS SEIFA.

## The need for a uniform approach:

There is a need for a uniform approach to planning for natural hazards across NSW.

Consistency provides certainty and confidence for councils that they are aligned in the ways they understand and manage risk in strategic land use planning, and their methodologies are systematic, rigorous and based on sound evidence.

Consistency also enables communities, government organisations and investors to make well-informed decisions about how to manage their risks, and where they will live and/or locate their assets by enabling them to compare locations.

Council supports Guiding Principle 6 and the need for evidence-based decision making underpinned by high quality data. Whilst we acknowledge the list of 12 data platforms and sources in the Toolkit is comprehensive, the sheer number is problematic. In the absence of a recommendation for a specific source, each council must shoulder the responsibility of deciding which to use.

There are also 14 guides for natural hazards management and 8 risk assessment guides in the Toolkit. There is also no recommendation for a standardised approach to community engagement in decision making, including when communities should be involved, how to involve them and how to ensure a

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diversity of views is captured. Engagement can be resource intensive and planning for natural hazards involves difficult conversations.

These issues increase the risks outlined above around lack of consistency across council boundaries. It also forces councils to engage in exercises that are time consuming and intensive in terms of the level of technical expertise required. (For instance, the data sources listed in the Toolkit present different information in different ways, and to varying degrees of accessibility).

Councils are often resource constrained and many are still involved in recovery from the continuous series of shock events of the last 18 months. It would be helpful if the NSW Government provided specific recommendations, as well as capacity building and resources for councils to use the data and methodologies, including methodologies for assessing acceptable levels of risk.

## Recommendations:

- That the *Guidelines* include specific advice about which data platforms, sources and scenarios councils should use to enable a standardised approach to data usage across NSW
- That the *Guidelines* ensure the data platforms, sources and scenarios present information that is accessible and user friendly
- That the *Guidelines* include specific advice about which risk assessment, natural hazard management, community engagement methodologies and methodologies for assessing acceptable levels of risk councils should use to enable a standardised approach to planning across NSW
- That DPIE consider providing training, resources and capacity building for all councils across NSW to enable use of data and methodologies in strategic land use planning.

## Building Back Better and climate adaptation:

*The Guidelines* should specify which clauses councils should use to enable communities to build back better after natural disasters.

The Guidelines should also ensure upfront consideration of resilience and higher standards for buildings and structures to ensure effective climate adaptation and improved safety within settlements.

## Recommendations:

- That *The Guidelines* specify which clauses to use to ensure communities build back better after natural disasters
- That *The Guidelines* also emphasise upfront resilience and climate adaptation measures for buildings, structures and settlements.

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## Community engagement

Guiding Principle 4 recommends involving communities in conversations about risk. We acknowledge the importance of ensuring decisions around competing objectives be underpinned by community values and risk appetite. The Guide also makes the point that communities live with risks in the long term.

Communities should also be involved in other parts of the planning process, including identifying risks, impacts and planning solutions. Communities bring valuable place-based expertise including direct experience of shock events, understanding of existing stresses and vulnerabilities (including levels of community cohesion and how communities behave during a crisis) and the kinds of operational solutions that will work on the ground.

As previously mentioned, a standardised approach for engagement should be developed. It is also vital communities understand the technical aspects of natural hazard risk to provide well-informed feedback and build their own capacities to prepare for, respond to and recover from natural disasters. DPIE could provide resources and training to councils to assist them to prepare community information and education materials.

Council also notes that three of the five 'Key Considerations' under Guiding Principle 4 relate to consultation and collaboration between organisations rather than communities.

### Recommendations:

- That the *Guidelines* include advice around involving communities in all parts of the decision-making process, and specific recommendations for a standardised approach for how this should be done.
- That DPIE consider providing resources and capacity building to support community engagement in decision making including materials, guidelines and resources.

## IMPLEMENTATION

As previously stated, *The Guidelines* should outline next steps and implementation. This should include clarification around how they should be integrated into planning instruments, including how councils should integrate them into local planning instruments.

### Recommendations:

- That there be clarification around how *The Guidelines* should be integrated into planning instruments, including local planning instruments.

## THE APPENDICES

It would be useful to understand how the documents respond to the NSW Bushfire Inquiry and Royal Commission into National Natural Disaster Arrangements.

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## THE TOOLKIT

The toolkit should include information on methodologies for valuing green infrastructure as well as for mapping heat data and/vulnerability and heat indexes. It is vital the planning system respond effectively to heatwave risk.

The Toolkit should include guidance on socio-economic mapping and data sets. For instance, the Toolkit should link planners to data such as the ABS SEIFA index.

The Toolkit also provides no guidance around evacuation planning and modelling tools.

### Recommendations

- That the Toolkit provide guidance and information on methodologies and tools for:
  - Valuing green infrastructure
  - Mapping heat and vulnerability, heat indexes
  - Socio-economic mapping and data sets such as the ABS SEIFA
  - Evacuation planning and modelling.

Council poses the following further questions in response to the package:

### Further questions

- Will these guidelines be used by all levels of government in making strategic planning decisions in NSW?
- What is the next step for implementation of *The Guidelines*? How will they be embedded/integrated into planning instruments at all levels and how will they be enforced?