Advocating for the people of Western Sydney

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8 June 2021

Attention: Director Environmental Policy
NSW Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Re: Natural Hazard Guidelines for Strategic Planning

Thank you for the opportunity to provide feedback on the *Strategic Guide to Planning for Natural Hazards* package which seeks to improve integration of hazard resilience into strategic planning across NSW.

WSROC commends the NSW Government's work to integrate natural hazard resilience into strategic and urban planning systems and supports the provision of a collated resource of hazard-related information to support resilient strategic planning. However, we believe there are several ways in which the resource could be strengthened to ensure it delivers intended outcomes in practice.

1. How this Guide aligns with the draft Design and Place SEPP

While it is understood that this Guide is not intended to be a technical document or replace existing emergency management manuals such as Planning for Bushfire Protection, it is unclear how this document relates to the draft Design and Place SEPP. WSROC understands that a Resilience Toolkit will be developed as part of the Design and Place SEPP. Future iterations of this document should clarify whether this document is part of the Design and Place SEPP, and if not, it should clarify how these documents relate to one another.

2. Recognition of urban heat islands

Heatwaves are a critical hazard to city systems, and planning for hazards is rightly outlined in the Guide. However, we believe there is opportunity to further reference urban heat islands under (which create resilience challenges for cities in between heatwaves) under the heatwave hazard.

WSROC has worked closely with local government and leading scientists to develop the Urban Heat Planning Toolkit. This toolkit specifically outlines measures to address urban heat via local planning instruments, however it also provides a strategic overview of heat and how it can be addressed from a resilience perspective in all its forms (urban heat, extreme heat and heatwave). We encourage the NSW Department of Planning Industry and Environment to consider how this toolkit could assist the integration of urban heat mitigation and resilience into strategic planning.

3. Ensure an all-hazards approach is taken in all new Planning Proposals

To ensure natural hazards are considered early in the development process it is recommended that a new 9.1 Direction is created to take an all-hazards approach. Currently, the 9.1 Directions include considerations to address Flood Prone Land (4.3) and Planning for Bushfire (4.4) however there is no

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requirement to address other hazards such as heatwave, storm, coastal erosion etc. Given that many planning proposals are occurring in parts of Sydney (and NSW) severely impacted by heatwave, ensuring consideration of this hazard, in particular, would be beneficial to the resilience of future communities.

In addition, the Natural Hazards Guideline should provide additional information on how planning proposals should address hazards to ensure they are being assessed adequately and consistently across the state. WSROC's recent work in urban planning for heat has reiterated the importance of translating known science into practical guidance that planners and developers can apply to real-world proposals. At present the draft Natural Hazard Guidelines do not indicate the type or level of information that should be submitted as part of a planning proposal to address potential natural hazards.

4. Comments on Guiding Principles

Guiding Principle 4. Integration of community organisations

Best practice in resilience building highlights the critical role of local community organisations in supporting communities to prevent, prepare, respond and recover to disaster (COAG, 2011). Work by WSROC on heatwave management has found that such organisations are heavily relied on in times of disaster but are not always adequately engaged in resilience planning. We suggest that greater weight is given to engagement with community organisations at the strategic planning stage by including a stand-alone dot point under key considerations for *Guiding Principle 4.*

Guiding Principle 6: Be information driven

WSROC supports *Guiding Principle 6* which recognises that good strategic planning must be supported by solid place-based hazard research. Further, we commend the work many local councils have been doing in this space. However, ability to invest in such research is highly dependent on a council's internal resources, so that some councils have far more capacity than others. Recent research published by McGregor et al. (2021) demonstrate that council capacity to invest in strategic planning for hazards is highly variable depending on factors including relative remoteness, LGA size, population base (rate payers), and staffing resources. This is particularly concerning given that peri-urban and regional councils, with larger land areas, smaller staff and lower population size are often more exposed natural hazards like bushfires, drought, flood and extreme temperature. Further, providing this information in a community-facing format that is updated regularly – while important – is also expensive and a time intensive endeavour.

To ensure equitable outcomes across NSW, WSROC recommends that the NSW Government consider measures to ensure all councils have the capacity to develop or access hazard-related data. This will allow the delivery of strategic planning that benefits resident safety, community resilience and reduces the costs of recovery. There are several ways this could be achieved, for example:

- Appropriate resourcing (skills development and funding) be made available to councils.

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- Collating hazard data and resources at the state level so that all councils have access to baseline level of hazard data from which to build. This would also support the need for holistic understanding hazards as they exist across LGA boundaries.

Guiding Principle 8: Understand the relationship between natural processes and natural hazards

WSROC agrees that a greater understanding of the natural environment and how these contribute to hazards is critical for holistic risk mitigation. While alluded to in other sections of the document, we believe it would be beneficial to include an overt statement under *Guiding Principle 8* noting the importance of anticipating how new developments may alter natural hazard risk for existing development based on an understanding of natural processes. For example new development can increase flood risk for existing downstream communities via increased run-off driving higher flood peaks (Shuster et al., 2005).

5. Greater guidance is needed to translate strategic planning to instruments

While it is beyond the scope of these Guidelines, WSROC would like to highlight that one of the greatest challenges in planning for hazard resilience is the translation of research, data and knowledge into practical planning policies and controls. Without clear planning controls, strategic planning cannot deliver intended outcomes in place. WSROC supports further work to update the Standard Instrument LEP to include compulsory hazard clauses and develop example DCP clauses for guiding hazard resilience. This work would not only create significant efficiencies (when compared to each council doing so individually) but would create some measure of consistency across the state.

Thank you again for the opportunity to comment on the *Strategic Guide to Planning for Natural Hazards.* If you would like to discuss any matter outlined above please do not hesitate to get in touch with the WSROC office on 0296714333 or info@wsroc.com.au.

Sincerely,

Charles Casuscelli

WSROC CEO

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