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SUBMISSION:

Draft Cooler Places Guidelines V1

Western Sydney Regional Organisation of Councils Limited.

November 2025

This document

WSROC thanks the NSW Premier's Department for the opportunity to provide feedback on the Draft Cool Places Guidelines V1

Some of our member councils, and councils participating in relevant WSROC programs, will make their own submission. This document should be viewed in addition, and complementary to those submissions.

We would welcome the opportunity to discuss local government views and requirements further.

Should you have any further questions on this submission, please contact Kelly Gee at WSROC on

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1. About WSROC

Formed in 1973, the Western Sydney Regional Organisation of Councils (WSROC), represents local government across Greater Western Sydney.

With a reputation for considered policy analysis and bipartisan advocacy, WSROC brings a collective voice to those issues which are crucial for Western Sydney's growing population. WSROC's primary role is to represent the councils and communities of Greater Western Sydney as well as developing resource sharing and other co-operative projects between Greater Western Sydney councils.

Over the past 50 years WSROC has developed a strong reputation for bi-partisan advocacy, especially in the key areas of economic and social development, job creation, transport and infrastructure, planning, health and the environment, and has proven itself a reliable partner in intergovernmental relations, regional strategic planning, and coordinating joint projects and programs.

Heat Resilience Program

WSROC has been working on the issue of heat resilience since 2016. This has included reviews of urban planning controls, developing place-based risk assessments, building community heatwave preparedness and reviewing governance gaps in heatwave management across NSW. In 2023 WSROC and Resilient Sydney established the Greater Sydney Heat Taskforce with funding from Australian (NEMA) and NSW (Recovery Authority) governments to address this gap, aiming towards a long-term vision where people living in Greater Sydney can survive and thrive in a warming climate and during extreme heat events. Taskforce program outputs include:

- Heat Smart City Plan: A multi-sector heat resilience plan for Greater Sydney.
- Cool Suburbs NSW: A science-led heat resilience rating tool for urban design and development (Coolsuburbs.au).
- Community Heatwave Risk Assessment: Place-based heatwave risk assessment tool that focuses on community health and wellbeing.
- Heatwave Management Guide: For local government on the management of heatwaves.

2. Introduction

WSROC would like to thank the Premier's Department for the opportunity to comment on the *Draft Cooler Places Guidelines V1*.

In particular we welcome the opportunity for local government professionals operating outside the emergency management system – who are most likely to run and manage cool places – to contribute to the development of the Guidelines. This is very uncommon in emergency response consultation and we hope the outcome will be stronger due to this broader contribution. We also welcome the Department's willingness to build on existing work such as the *Heat Smart City Plan* and *Heatwave Management Guide* which was developed over 18 months in close consultation with councils across Greater Sydney and NSW more broadly.

WSROC acknowledges that the *Draft Cool Places Guideline V1* is a first step towards developing heatwave response protocols within a new, emerging and complex policy space. We also acknowledge that the Guidelines sit within a very specific policy framework and respond to the specific needs of the Heatwave Emergency Subplan 2024. As such they cannot address the full range of challenges and issues relating to the provision of cooler places – however we do hope that the Premier's Department will seek to ensure this document aligns with the broader ecosystem of government policy including guidance for managing hot weather and extreme events outside declared heatwave scenarios.

WSROC has consulted widely with Western Sydney councils on the drafting of this feedback, however we note that the views and experiences of individual councils may differ, and their responses should be considered alongside, and addition to, this feedback. However, councils were unanimous in recommending:

- The need to clarify definitions of Cool Places, Spaces and Centres used in the Guidelines.
- Updating the audience to include the local and regional emergency management committees.
- Clarifying roles and responsibilities, including the need for LEMC (not just council) coordination of Cool Places planning and operations.
- Include more specific planning and operational direction based on the expertise of EMC members (e.g. triggers, animal management, health management, transport etc).
- Include minimum requirements for Cool Places to ensure that they are not being established in situations that would increase heat exposure and risk for communities.
- The need for a consistent state-wide approach to communication across different local areas – this can then form the basis for local message tailoring.

- The need for consistent monitoring and evaluation templates to support ongoing review of these Guidelines and the performance of Cool Places, ideally linked to LEMC processes.
- The need for broader review of funding and resourcing arrangements both for Cool Place operations and longer term infrastructure upgrades.

Please get in touch if you have any questions about the information contained in this submission and would like to discuss this further.

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3. General: Funding and resourcing

WSROC acknowledges that resourcing and funding of community Cool Places is outside the scope of these draft Guidelines, nevertheless, it is our obligation to reinforce the significant level of funding and resourcing required to run Cool Places in a way that reduces rather than increases community risk.

It should be noted that significant funding shortfalls as identified in the Inquiry into the ***Ability of local governments to fund infrastructure and services*****,** significantly limit the capacity of local government to deliver Cool Places. Many local governments are finding it difficult to maintain existing facilities and services, let alone increase opening hours and staffing at these locations without further resourcing.

While we understand through discussions with the Premier's Department that these Guidelines are intended to be non-compulsory, this intent could be more overtly stated to avoid misconceptions. Further, the Guidelines should better acknowledge the joint responsibility between state agencies, local councils, NGOs, and the private sector, to avoid the perception that local councils alone must deliver.

We note that, at present, most respite options for at-risk groups operating in Greater Sydney are only able to be delivered via partnerships between different organisations. These partnerships allow shared resourcing but also ensure safer outcomes by bringing in diverse expertise.

Recommendations:

- Include a statement in the introduction that these guidelines are non-binding and intended to support local decision-making, subject to local capacity and governance frameworks.
- Include a statement that better acknowledges the joint responsibility between state agencies, local councils, NGOs, and the private sector, to avoid the perception that local councils alone must deliver. Include a statement that members of the EMC be required to support local government in the delivery of community Cool Places via resourcing and other in-kind support.
- Acknowledge the need for partnership models (e.g. where local councils coordinate identification and promotion, state agencies provide expert advise and community organisations or businesses manage operations).
- That the SEMC recommend inclusion of heatwave as a declared hazard under emergency funding arrangements to allow funding opportunities for Cool Places in future.

4. General: Alignment with the policy framework

The *Draft Cool Places Guidelines V1* are a State Emergency Management Committee (SEMC) document with the scope described as:

> ***"These guidelines provide the definitions and key considerations required to establish and operate Cool Places during heatwave emergencies."***

This is in alignment with the role and authority of the SEMC and associated legislation SERM Act 1989, EMPLAN and NSW State Heatwave Sub Plan 2024. However, there are several elements of the document that do not align with the policy framework creating confusion for readers.

Audience

The proposed audience for these Guidelines (1.4) is not in alignment with the above policy framework. Local and state government agencies are described as the key audience for the document. However, as an SEMC guideline advising on activities during the activation of emergency arrangements, the key audience for this document should be Regional and Local Emergency Management Committees (REMC and LEMC).

Beyond the legislative framework, we believe that the REMC and LEMCs are more appropriate target audiences for this document because:

- Cool Places are intended to be part of the emergency management arrangements and REMCs and LEMCs are the vehicle for activation of these arrangements.
- The safe and efficient delivery of Cool Places (particularly given lack of funding) requires a coordinated approach between agencies of the LEMC. This will ensure:
    i. Local government efforts are supported with relevant expertise and resources (e.g. health and behavioural support, community transport, energy reliability).
    ii. The most efficient use of resources and distribution of Cool Places across an LGA or region.

WSROC suggests changing the described audience of the document (1.4) to the below. With other changes for consistency made throughout the document.

> *"These guidelines are intended for Regional and Local Emergency Management Committees, local and state government agencies as well as other stakeholders that may be involved in the planning, identification, establishment, operation and review of community Cool Places, such as volunteer organisations and/or local businesses.*
>
> *Although the wider community is not the primary audience, community members may find the content informative."*

Including REMCs and LEMCs in the defined audience of the document will encourage members of these committees – which, in NSW, are not council committees – to support the delivery of Cool Places.

While we acknowledge this document is seeking to be flexible to accommodate different LGA needs and resourcing, we would like to see the document more explicitly articulate what falls within and outside the current emergency response framework. For example, stating that formally declared heatwaves activate local emergency arrangements and involvement of the EMCs, whilst hot days are outside the remit of the emergency arrangements but can be considered by councils based on local needs and resourcing. A diagram or similar would be very helpful to demonstrate who has responsibility under what types of heat scenarios. For example, NSW Ambulance is the lead for formally declared heatwave response, however who should be consulted outside these formal declarations? Is it NSW Health? The NSW Reconstruction Authority? It is currently unclear.

Triggers of activation

Given these Guidelines are designed to be activated during emergency management arrangements – where coordination is required – all LEMC members should be required to support the planning and delivery of Cool Places. This would not only ensure better resourcing in the absence of formal funding, but ensure Cool Places are delivered in the safest, most efficient and effective way possible.

Roles and responsibilities

As recognised in these Guidelines, community Cool Places are complex to establish, particularly when considering health and safety of at-risk community members with complex needs. Specific skills and expertise are required to deliver cool spaces, and these are not the core business local government. For example, Table 3. Outlines some of the expertise that members of the LEMC could provide to support the development of Cool Places if required to engage in their planning and delivery. It is suggested that clear roles and responsibilities for Cool Places (where they are being established) are articulated in the Guidelines.

Table 3. Contributions that LEMC members could provide to Cool Places establishment

Agency	Role/expertise
NSW Health NSW Ambulance	Advice on evidence-based triggers for activation. Advice on management and triage of escalating health concerns.
Transport for NSW	Support councils plan appropriate community transport arrangements.
Department of Communities and Justice	Advice on site selection based on Evacuation Centre selection (e.g. accessibility). Advice on management of community social and behavioural issues and required services/resourcing.

Energy and Utilities Functional Area representatives	Advice on risk relating to power outages and have an understanding of backup power.
NSW Police	Advice on security and other behavioural challenges.
Primary Health Networks	Connect Cool Places with primary health care providers such as general practice, aged care, allied health and chemists.
Department of Primary Industries	Advice on management of animals.
Department of Education	Advice on use of local schools as potential cool spaces – noting their often central location and community familiarity.
NSW Reconstruction Authority	Heatwave risk management outside formally declared emergencies. Availability of data to support Cool Places planning.
Local Government	Community buildings Community outreach and engagement.

Acknowledging that heatwave response is a new and emerging space, this type of coordination is even more important to accelerate understanding of roles and responsibilities in heat respite.

Recommendations:

- List REMCs and LEMCs as part of the audience for the document to align with policy context.
- Improve articulation of what falls within, and outside formal emergency management arrangements and who is responsible in different scenarios (e.g. formally declared heatwaves vs. hot weather).
- Include a list of roles and responsibilities amongst different agencies in the planning and operation of Cool Places.
- Include a directive that LEMC members collaborate on the planning and establishment of Cool Places where this is being undertaken.

5. General: Ensure Guidelines do not conflate local government and LEMC

We would like to reiterate that Local Emergency Management Committees and local government are not one and the same. Local councils are just one member of the LEMC. The Guidelines currently appear to conflate local government and LEMC responsibilities, and we believe this will prevent the Guidelines being implemented in a coordinated, multi-agency fashion.

Councils do not have the power to direct members of the LEMC to participate in planning for Cool Places, nor do councils have access to the same resources and knowledge of emergency arrangements as the collective body of the LEMC. For example, many LEMC documents including *Emergency Management Plans*, and *Consequence Management Guides* are kept 'in-confidence' by the LEMC and are not able to be accessed by council staff – specifically those involved in cooling programs to date. This was evidenced in the consultation workshop for these Guidelines where many attendees were not familiar with updates made by Ambulance NSW for heatwave.

While it makes sense that local government should be intimately involved in the planning of community Cool Places, without the support and coordination of the LEMC, their capacity will be extremely limited.

Recommendation:

- Review the Guidelines to ensure the roles of LEMC and local government are not being conflated, and replace the term 'local council' with 'LGA' or 'LEMC Area' when referring to a geographic area to avoid misinterpretation.

7. Definitions: Currently unclear, contradict current practice, and do not link to operational requirements

WSROC commends the draft Guideline's intent to develop consistent, agreed definitions for the diverse arrangements designed to provide respite to the community during heatwaves. Having consistent, common language across NSW will assist professionals as well as community members seeking to use these services. Unfortunately, at present, the definitions provided in 2.1 directly contradict current practice as well as definitions provided WSROC reference documents, and do not link to clear operational requirements.

Referencing the Heat Smart City Plan and Heatwave Management Guide

WSROC acknowledges efforts to align with definitions in existing documents such as the *Heat Smart City Plan* and *Heatwave Management Guide*, however the draft Guidelines currently conflict with these documents creating confusion for readers. WSROC is happy to discuss this further.

The *Draft Cool Places Guidelines V1* appears to use 'Cool Places' as an umbrella term for Cool Centres and Cool Spaces. The Heat Smart City Plan and Heatwave Management Guide do not use the term Cool Spaces, but differentiate only between Cool Places (places that the community visits in hot weather) and Cool Centres (formally activated and staffed places of respite for at-risk communities). More importantly, the purpose and definition of Cool Centres provided in the *Draft Guidelines* directly contradicts both current practice and the WSROC materials provided for further reference (see Table 1 and 2).

Table 1. Draft Cool Places Guidelines definitions

Cool Places		
	Cool Spaces	**Cool Centres**
What they are	*Cool Spaces are targeted at at-risk community members... who need respite, but cannot attend Cool Centres due to financial, transport or other limitations.*	*Cool Centres are specifically intended to provide heat respite.*
When activated	*Activated temporarily during heatwaves or high temperature periods.*	*Activated temporarily during heatwaves or high temperature periods.*
Audience	*At-risk community*	*General community*
What's needed	*Not specified*	*Include support personnel in attendance*

Table 2. Heat Smart City Plan definitions

	Cool Places	**Cool Centres**

What they are	*Existing public or private spaces that provide cooling indirectly or incidentally to their main purpose (e.g. pools, shopping centres, and parks).*	*Spaces provided for the purpose of extreme heat respite*
When activated	*Normal business hours of operation*	*Activated temporarily during heatwaves*
Audience	*General community*	*At-risk community*
What's needed	*Potential increased staff or extension of operating hours*	*Resourcing required for safe operation. This may include trained staff or volunteers, healthcare oversight, transport and energy backup.*

Operational differences between Cool Places, Cool Centres and Cool Spaces

In addition to the broader definition and purpose of these respite options, the operational differences between "Cool Places", "Cool Centres" and "Cool Spaces" is also unclear. It is important that the Guidelines specify:

- **Who activates them?** The LEOCON, NSW Ambulance, Council's GM or Mayor? Does this differ between places, spaces and centres?
- **Under what circumstances does each respite option operate?** Only declared heatwaves? Other times? What evidence determines these triggers?
- **What level of staffing/support is required?** Is there a minimum ratio for staffed spaces to ensure community safety? What types of expertise are required? First aid? Cultural safety? Other? Minimum requirements are critical to ensure that communities are not being put at greater risk by travelling to cool places.
- **Who bears responsibility for safety?** The LEMC? Council? Venue owners?

Contradictions to current practice and operational practicalities

A related point. It is currently unclear whether all of the heat respite options described in the Guidelines fit within the emergency management arrangements and the auspices of the LEMC (i.e. formally declared heatwave events with activation of local emergency plans). It is implied that certain respite options (i.e. single hot days) sit outside the emergency arrangements, however this is unclear and likely to create significant confusion at the local level. WSROC suggests providing a clear statement about what this Guideline covers and what is in and out of scope under the emergency arrangements.

Bringing together at-risk individuals in one location creates significant complexity and risk that must have appropriately skilled personnel to manage (e.g. medical and psychological oversight, translation and cultural safety services, and security to manage behaviours, community transport). The Guidelines currently state that non-staffed 'cool spaces' are designed for at-risk groups which is counter intuitive to

the needs of these communities. There is also a statement that 'Cool Centres' may be more difficult to get to for at-risk groups than 'Cool Spaces'. However, in our experience, councils very deliberately to establish 'Cool Centres' in proximity to communities of greatest need.

Recommendations:

- Review the definitions provided in 2.1 to ensure they align with the practicalities of heat respite operations (e.g. staffed spaces with greater resourcing (Cool Centres) are more appropriate for at-risk communities with complex needs).
- If referencing the Heat Smart City Plan and Heatwave Management Guide ensure that the definitions align or are clarified.
- Clarify the difference between "Cool Places", "Cool Centres" and "Cool Spaces" operationally (e.g., who activates them, what level of staffing/support is required, and who bears responsibility for safety).

8. Principles: The first option for all community members should be a cool, safe home

It is important that the draft Guidelines are put into the broader heatwave safety context by specifying that cool places are not designed to replace the need for a cool, thermally safe homes. This is essential to reinforce the importance of good heatwave risk planning and preparedness measures (e.g. via the planning system), but also to acknowledge that travelling during heatwaves, particularly by active or public transport can be dangerous to health due to the increased risk of heat exposure.

Clarity around safe homes as a first option is also important for informing communications around cool places. At-risk individuals should not be encouraged to travel to a cool place where it is unnecessary, and available cool places are not overwhelmed by individuals who could stay safe at home.

Amend the Principles at the start of the document to read:

> ***"All residents should live in homes that are safe from extreme heat and heatwaves.***
>
> ***Where that is not available:***
>
> ***(a) educational resources and risk communication materials should promote practical strategies to reduce the negative impacts of heat, including the use of fans and skin wetting, minimising time spent outdoors and maintaining adequate hydration to enable community members to safely remain in their homes and workplaces during heatwaves or extreme heat.***
>
> ***(b) Cool places are a risk mitigation measure that provides facilities for members of the community, including individuals who are unable to effectively manage their health and wellbeing in their own homes or workplaces during heatwaves or extreme heat.***

Recommendation:

- Amend the Principles at the start of the document to emphasise cool, safe homes as the first choice for heat respite.

9. Considerations for the planning and delivery of Cool Places

The Guidelines cover a range of areas for consideration when identifying and activating cool places. However, at present these cover areas that are commonly considered by councils. The usefulness of this checklist would be greatly increased by providing further detail in areas where councils lack experience. For example, the emergency sector has strong protocols and guidance around the establishment of Evacuation Centres which have many similarities to Cool Places (e.g. accessibility requirements) and this could be adapted for the Guideline. Councils have advised that the following areas require further information and clarification.

Energy reliability and continuity:

The *Draft Guidelines* currently omit considerations around power supply and reliability when planning for cool places. This is the most critical consideration for ensuring safety of cool places. Whilst availability of air-conditioning is listed as a consideration, experience has shown the need to consider:

- The likelihood of power outages at a particular location.
- Operational thresholds of individual AC units as many are not rated to function reliably in heatwave conditions. Operational thresholds should include consideration of both outdoor temperature and number of people in the venue.
- Availability of backup power or other contingencies in the event of a power outage.

The Energy and Utilities Functional Area could provide some excellent advice in this area which should be included in the Guidelines. Further, energy network providers have expressed their desire to know where cool places are located so they can advise operators of power outage risk and/or work to protect these locations from potential outages. Cool place operators should be required to consult with energy providers.

Triggers for activation:

Finally, consideration should be given to listing cool places on the registry of vulnerable facilities to prioritise power availability.

As highlighted in the previous section, definitions of each heat respite option should be linked to clear operational requirements such as triggers for activation. This should include when, who and how cool places will be activated.

When: While it is suggested that triggers may be locally set, this is problematic because:

- Triggers should be based on evidence. Advice on how to set these triggers, or who should advise on the establishment of triggers (e.g. local health authorities) should be included.

- Experience has shown that consistency of activation (both over time and geographically) is key to support community awareness of when cool places will be available. And avoid dangerous travel where cool places are not available.

Who: The Guidelines are silent on who has the authority to declare or activate a cool place (i.e. Mayor, General Manager, LEOCON, NSW Ambulance or delegated officer).

How: It is also unclear how cool place activation/deactivation will be communicated in a timely fashion to those responsible for operating cool places? This is particularly important given the proposed diversity of cool place operators across levels of government, the community and private sector.

Site selection

The guidance provided in this section could be more detailed and ideally include a checklist of minimum requirements for safe operation of cool places. This is critical as an inadequate cool place could pose greater risk to attendees. As outlined above, DCJ could provide some more detailed guidance on site selection. However, additional considerations include:

- Energy reliability and cooling thresholds (see above).
- Maximum number of people that can safely be accommodated at a site.
- Insurance, building compliance, accessibility standards and WHS responsibilities.

It is suggested that cool place considerations could be expanded to an audit similar to evacuation centres which should be completed by the LEMC at regular intervals to ensure designated cool places remain fit for purpose.

Site selection also suggests neighbouring councils to consider the feasibility of collaboration on cool places. Collaboration and partnerships on cool places is strongly supported by WSROC however this is not specific to local government. State agencies (e.g. schools and transport), NGOs and private businesses should also be engaged in this type of coordinated planning, ideally coordinated by the LEMC.

Opening hours

Opening hours is an important consideration, however there is inadequate guidance included in the Guidelines to support informed decision making. The Guidelines should include information on the benefits and drawbacks of different opening timeframes. E.g. Will people be at greater risk if sent home during particular hours (e.g. 5pm may still be 35 – 40C)? Are transport options available at time of closure? What additional considerations are required for 24 hour operation?

Staffing, Resourcing and Services

The Guidelines should include clearer guidance on minimum requirements around staffing and resourcing for safe operations. If selected sites and locations fall below requirements this may pose additional risks to community members. Some considerations may include:

- Minimum staff ratios for anticipated attendance levels.
- Training requirements – first aid, mental health first aid, working with children etc.
- Managing staff availability over Christmas/New Year or January closures.

In the event of partnerships with non-government facility owners it is suggested that formal agreements/MOUs should be established before activation of advertised cool places. This should outline responsibilities for insurance, staffing, utilities and maintenance – ensuring appropriate compliance with minimum safety standards.

Accessibility and transport:

The Guidelines do well in identifying transport and access as a key consideration, however more direct involvement of state-owned transport is required to cool places.

Transport disruptions and outages

The Guidelines should acknowledge that public transport may not operate during high heat or emergencies and contingency plans should reflect this (e.g shaded pickup zones, temporary shuttle routes).

Community transport arrangements

Further detail on arrangements and processes governing community transport under Transport for NSW and NFPS would be useful. These have proven to be opaque and hard to access from a local government perspective. Further it should be noted that collaborations of this nature require early coordination and cost-sharing clarity.

Heatwave planning for state-owned services

More broadly, cool places planning would be greatly supported by NSW Government (via Transport for NSW) develop, implement and communicate a heatwave response plan to improve the availability, reliability and communication of service delays during extreme weather. Ideally, the NSW Government should consider making public transport (trains and buses) free of charge during heatwaves to reduce access barriers to Cool Places and provide mobile cool places.

Communication

Our members have advised that a consistent, state-wide approach to communication about cool places is essential to avoid community confusion and prevent individuals travelling to places that may not be

available. This should include state-wide signage or messaging to identify cool places to help the community be aware that welfare may be available if required.

This state-wide approach would not preclude local tailoring of messaging but would provide a framework within which local messaging could operate – as is currently the case for other hazards and disasters.

Animal welfare

There is a need to clarify which agencies have jurisdiction over animal management to avoid unrealistic expectations on local government. More detailed advice and considerations could be provided by Department of Primary Industries.

Financial constraints

This section should overtly state that there is no dedicated funding for cool place operations. This will help manage expectations.

Monitoring and evaluation

On page 6 of the Guideline it says *"consideration should be given to developing and implementing a structured local M&E process to enable local councils, service providers and partners to evaluate the effectiveness, equity and operational efficiency of Cool Places during heatwaves."* For state-wide consistency, and to support evaluation of the Guidelines at appropriate review periods, it would be beneficial for the SEMC to provide a monitoring and evaluation template as an appendix to the Guidelines. It could also be argued that monitoring and evaluation should be a task appointed to the LEMC via its annual processes as a mechanism for incorporating cool places outcomes and reporting back to the SEMC and inform state-wide policy.

Beyond trade processes

Long term there must be an avenue available to recoup the cost of operating cool places just as there are for evacuation centres. There should also be provisions for infrastructure upgrades to ensure that cool places are accessible to people in wheelchairs, have effective air-conditioning and power supply systems and proximity and transport for communities.