



**THE HILLS**  
Sydney's Garden Shire

**THE HILLS SHIRE COUNCIL**  
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2021 Regional Telecommunications Review Secretariat  
Department of Infrastructure, Transport, Regional Development and  
Communications  
GPO Box 594  
CANBERRA ACT 2601

Dear Sir/Madam

### **Regional Telecommunications Review**

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Thank you for the opportunity to lodge a submission on behalf of The Hills Shire Council with regard to the Regional Telecommunications Review. Council is also appreciative of the fact that its Local Emergency Management Officer (LEMO) Mr. Michael Lathlean was also able to provide a verbal submission to the Review members at the online forum held on Tuesday 14<sup>th</sup> September 2021.

The Hills Shire is located in the north-western outskirts of Sydney with the Shire's Administration Centre in Norwest being approximately 30 km from the Sydney CBD. The Shire covers an area of approximately 370 sq. km and extends a distance of 45 km from the suburbs of West Pennant Hills and Baulkham Hills in the south to Wisemans Ferry in the north. Approximately 70 percent of the Shire's area is rural in character with the urban residential areas being concentrated in the southern part of the Shire. However these rural areas are diminishing to some extent as development occurs in new release areas in the suburbs of North Kellyville, Box Hill and Gables. The Shire's residential population in 2020 was 183,791 of which 15,602 were located in the northern rural areas.

The northern and western boundaries of the Shire are largely established by the Hawkesbury River which runs through a narrow sandstone gorge between Sackville and Wisemans Ferry. This in turn creates a relatively narrow flood plain along this part of the river which in an emergency such as the March 2021 Hawkesbury River flood, can lead to the isolation and inundation of residential, commercial and tourism related developments along the river. The limited extent of the local and State Road network as well as the reliance on four cable operated vehicular ferries to cross the river also restricts access to those areas.

The northern rural part of the Shire contains large areas of natural bushland that are heavily vegetated with a topography that is characterized by a series of ridgelines and adjoining gullies. This creates a significant risk of bushfire as evidenced by the December 2002 fires that impacted on that area. Fortunately most of The Hills Shire was not impacted during the 2019/2020 bushfire emergency but this was largely a case of good fortune that saw the prevailing winds push the fire

front from the Gosper Mountains area in the adjoining Hawkesbury City local government area to the south rather than the east.

Council's response to the Regional Telecommunications Review is largely based on the direct impact on emergency management that occurs as a result of the poor telecommunications coverage across the area. However as the Review members heard from a number of residents and community representatives from the peri-urban areas on the north-western outskirts of Sydney at the recent online forum, this lack of telecommunication service coverage is also impacting on the community's ability to work, study and maintain social interaction in those areas. These challenges and frustrations have been particularly evident through the 2019/20 bushfire emergency, the March 2021 Hawkesbury River flood event and the ongoing Covid 19 pandemic.

A critical element of the community's preparation for, response to and recovery from an emergency is a reliance on the availability and equally importantly the reliability of telecommunications services. Unfortunately for many areas of north-west Sydney there is strong anecdotal evidence as well as published network coverage data that suggests that this is not always the case.

The growth in the use of various web based social media platforms, GPS navigation, apps such as 'Fires Near Me' and the system generated emergency text messages make it much easier for the community to receive and exchange information which can be critical in all phases of an emergency including the period of recovery. However the availability of this technology is of little benefit if access is restricted by poor telecommunications coverage and reliability.

In NSW the roles of local government in emergency management are clearly defined in the State Emergency and Rescue Management Act 1989 through the establishment of a Local Emergency Management Committee and the provision of executive support to that Committee and the Local Emergency Operations Controller (LEOCON). One of those roles is to identify a suitable site for a Local Emergency Operations Centre (LEOC) where all response and support agencies are brought together in order to prepare for, respond to and recover from an emergency.

For The Hills Shire, its main LEOC is located at The Hills District Office of the Rural Fire Service located on Annangrove Road at Kenthurst. In recent years the experience of both emergency service and support agency personnel operating out of the LEOC is that telecommunications services can at times be extremely poor which can have a significant impact on the operational effectiveness of the facility. The most recent example of this was during the March 2021 Hawkesbury River flood event where an attempt was made to utilise the District Office as the Regional EOC for the Sydney North West Metropolitan Region. Unfortunately that REOC had to be closed down after a few days and relocated elsewhere, largely due to the frustrations with poor telecommunications services that limited its operational effectiveness.

During a number of emergency events in recent years the Federal Member for Berowra has been able to facilitate temporary improvements to those telecommunication services at the EOC using his direct contacts within government and its associated agencies. However I am sure that the Review members would acknowledge such intervention should not be necessary at such a critical time during an emergency.

Another critical point to note relates to the resilience of the existing telecommunication infrastructure during recent emergencies that have impacted on The Hills Shire and adjoining local government areas. More densely populated areas of the Sydney Metropolitan area have significant built-in redundancy in their telecommunications networks.

Unfortunately that luxury does not exist in many parts of our rural areas where there are a limited number of telecommunications towers that rely on above ground electricity supply networks are

often disrupted or significantly damaged during major emergencies. Therefore those towers rely on back-up generators to provide an alternate power source. Unfortunately however there is anecdotal evidence to suggest that the network operators may not regularly check and test those generators and appear to have no contingency plans in plans to ensure that they are refueled during an emergency.

Council acknowledges that the Mobile Black Spot Program (MBSP) has resulted in significant improvements in telecommunications services across rural and regional Australia. However according to the Department of Infrastructure, Transport, Regional Development and Communication's own website only one project within the Hills Shire has been approved since the MBSP's inception. This is despite the fact that in 2014 Council formally resolved to provide access to Council managed public land for such facilities at no leasing costs for a maximum period of 10 years.

This result is no doubt disappointing and contributes to the frustrations of local residents, businesses, community groups and the emergency services with regard to the quality of telecommunication services within The Hills Shire.

As an additional point, and while acknowledging that this issue lies beyond the scope of your review, Council would like to the opportunity to also raise the issue of improving the standards and practices broadly associated with community engagement and consultation in determining the locations of telecommunications infrastructure assets. Council has experienced recent community discussions on this aspect of the process and would submit that these processes could be improved by the relevant agencies concerned.

In conclusion Council would like to thank the Review members for considering its submission and formally thank the Federal Member for Berowra in his ongoing advocacy for the improvement of telecommunication services across the rural areas of The Hills Shire.

If the Review members would like to discuss this matter, I would be more than happy for you to contact me on [REDACTED] or at [REDACTED]

Yours faithfully



**Michael Edgar**  
**GENERAL MANAGER**

CC: Federal Member for Berowra