



Floodplain Management Australia

(Formerly Floodplain Management Association)
Supporting Wise Planning and Development
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President: Ian Dinham 0435 946 525

5 April 2016

The Director Regions, Northern
NSW Department of Planning and Environment
Locked Bag 9022
GRAFTON NSW 2460

Dear Sir/Madam

Submission - Draft North Coast Regional Plan

Thank you for the opportunity to comment on the above.

Floodplain Management Australia (FMA) has a membership of over 120 local governments, catchment authorities, consultants, businesses and individuals from New South Wales, Queensland, Victoria and ACT (see <http://floods.org.au/fma-members/> for full list of members). All Councils within the North Coast Region, with the exception of Bellingen Shire Council, Kyogle Council and Nambucca Shire Council are FMA members. Our particular interest relevant to this submission is to ensure that floodplain risk management (**FRM**) is properly considered in the establishment of regional land use planning direction in the North Coast Region of NSW.

The North Coast Region is expected to accommodate about an additional 100,000 people over the next 20 years (5,000 people per year). This will generate significant pressure to occupy coastal areas which are constrained by flood risks. While FMA does not oppose further development in the region, it does strongly advocate responsible development that carefully evaluates all flood risks to people, private property and public infrastructure when determining the location and nature of such growth.

The focus of our submission relates to that component of the draft Plan headed *DIRECTION 1.4 Adapt for natural hazards and climate change*. This section briefly refers to the *NSW Floodplain Development Manual* but does not explain how this will guide FRM development decisions in the region in any meaningful way. Positive input to FRM at the regional planning level is both appropriate and necessary.

The only other specific comment in that section of the draft Plan is that "Some developments (such as aged care facilities) can be sensitive to natural hazard events due to the difficulty of evacuation in an emergency." It is accepted that such uses are relatively more sensitive to flood related risks, but potential property damage and significant risk to life due to constrained evacuation capacity extends across most development. General housing and the population it supports can be subject to significant flood risks.

Further, the scope of information sources used to inform the draft Plan (page 9) is narrow and does not reference the vast range of available FRM information. Many of the Councils within the Region have prepared extensive flood mapping and/or have now adopted Floodplain Risk Management Plans prepared in accordance with the *Floodplain Development Manual*. These existing information sources would be valuable context to the Regional Plan.

FMA has adopted a *Land Use Planning Policy Position Statement* (attached) which sets out the range of investigations and FRM measures that should be established at different levels of plan making, including Regional Plans. We urge the Department to consider and apply the principles in the Statement. In particular we recommend the following be undertaken prior to the finalisation of the draft Plan.

- Identify the floodplains within the planning region and the key FRM considerations for development (e.g. evacuation, and private and public damages due to significant flood depths).
- Include a Regional Flood Planning Map that shows the extent of the floodplain(s) defined by the Floodplain Development Manual, and associated elements relevant to FRM.
- Identify regional stakeholders (e.g. Councils, Department of Planning & Environment, OEH, SES, Insurance companies, transport infrastructure owners, dam/irrigation authorities, etc.).
- Consider regional evacuation including the location and capacity of evacuation routes and centres.
- Determine suitable development areas having regard to cumulative flood impacts. The cumulative impact of land filling and development should not increase flood levels in existing urban areas. Such areas may have been identified within existing Floodplain Risk Management Plans.
- Identify regional FRM mitigation measures that are required to ameliorate the impact of future development (e.g. augmented capacity to evacuation routes).

FMA would be prepared to work with the Department to assist in ensuring the draft North Coast Regional Plan appropriately addresses FRM. We would appreciate the opportunity to meet with Departmental officers to elaborate on the above and to collaborate in the resolution of these matters.

Yours faithfully



Paul Grech
Director - Land Use Planning

Encl: FMA Policy Position Statement – Floodplain Risk Management in Land Use Planning

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