



Floodplain Management Australia

(Formerly Floodplain Management Association)
Supporting Wise Planning and Development
www.floods.org.au ABN 67 007 279 179

President: Ian Dinham 0435 946 525

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The Director Regions, Southern
NSW Department of Planning and Environment
PO Box 5475
WOLLONGONG NSW 2520

Dear Sir/Madam

Submission - Draft South East and Tablelands 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). FMA local government members within the South East and Tablelands Region are Cooma-Monaro Shire Council (now part of Snowy Monaro Regional Council), Eurobodalla Shire Council, Bega Valley Shire Council and Wingecarribee Shire Council.

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 South East and Tablelands Region of NSW.

The South East and Tablelands Region will need to cater for a population increase of over 44,000 people and nearly 15,000 dwellings over the next 20 years to meet the demands of a growing and ageing population (about 740 dwellings per year). This will place pressure to occupy 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 2.3 Build the region's resilience to natural hazards and climate change*. While this section recognises the need to augment flood hazard data to inform strategic regional planning, it is our view that should have been done to inform the Plan.

While *DIRECTION 2.3* recognises that the development of Floodplain Risk Management Plans (**FRMPs**) is undertaken by Councils in consultation with the community and relevant government agencies, the Draft Plan fails to draw on these documents. Many of the Councils within the Region have prepared extensive flood mapping and/or have now adopted FRMPs prepared in accordance with the *NSW Floodplain Development Manual*. These existing information sources would be valuable context for the Regional Plan.

Despite the reference to the *NSW Floodplain Development Manual*, the Draft Plan does not recognise the merit based approach that underpins the NSW Flood Prone Land Policy which provides for the tailoring of flood risk management measures having regard to the environmental, economic and social context of different areas.

The discussion of climate change related to natural hazards (page 32) is supported. However, more specific direction from the State Government on how this should be assessed and managed would be desirable, to ensure an efficient and regionally consistent approach.

No recognition is made of flood risk management measures that are proposed or required to minimise existing flood risks. Engineering works that reduce flood risks can make an invaluable contribution to the longer term sustainability of regional areas. The Regional Plan should identify the infrastructure required to support the improvements and growth planned, and funding mechanisms. Expenditure on flood mitigation should be an essential component of this. *Deloitte Access Economics* estimates that floods are costing Australia over \$560 million every year on average, yet the annual investment in pre-disaster preparation is just \$50 million.

FMA has adopted a Land Use Planning Position Policy (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 this guideline.

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 NSW 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 flood risk 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 South East and Tablelands 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

Please address correspondence to:

Glenn Evans Executive Officer Floodplain Management Australia

115 Marshall Street Garden Suburb NSW 2289

Email eo@floods.org.au

Phone 0415 873353