

13 March 2017



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Department of Planning and Environment
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Attention: Ms Carolyn McNally

Dear Ms McNally

Draft Far West Regional Plan

Thank you for the opportunity to provide a submission on the *Draft Far West Regional Plan* ('the Plan').

The NSW State Emergency Service (NSW SES) is the lead agency responsible for the emergency management of floods (including dam failure), storms (including coastal erosion and coastal inundation) and tsunamis. The NSW SES has an interest in the public safety aspects of the development of land with reference to these hazards, in particular, the potential for changes to land use that either exacerbate existing risk or create new risk for communities.

The NSW SES suggests the principles within the National Strategy for Disaster Resilience (adopted by COAG) and Emergency Risk Management frameworks, as strategic drivers for better land use planning. The National Strategy for Disaster Resilience promotes the principle that the acceptability of risk in the context of land use planning and development design, requires consideration of loss of life, as well as social, economic and infrastructure loss.

Draft Far West Regional Plan

The Plan prefers an approach to where it is implemented alongside the Far West Initiative (p 6). The Plan indicates that the Far West initiative is proposing a new regional statutory body (p 6). The NSW SES suggests that any new regional statutory body should facilitate and enable the connection between various levels of government to ensure that flood risk is factored into development assessment decisions. This will help achieve the Plan's Vision of achieving an exceptional natural environment and resilient communities, including enabling communities to have access to the latest information to manage natural hazard risks, and to be more responsive to the impacts of climate change (p 8). More specifically it will assist in achieving the directions within Goal 2 (An exceptional and distinctive natural environment) of the Plan.

The NSW SES has specific comments and recommendations in relation to goal 2. Specifically, direction 15 is of relevance to the NSW SES in achieving community safety and resilience to floods and storms.

Direction 15: Increase resilience to natural hazards and climate change

The Plan identifies a direction to increase resilience to natural hazards and climate change. The NSW SES applauds this direction as it will become more difficult to achieve resilience in the face of increasing development pressures and the impacts of climate change to natural disasters such as flooding.

Better weather data for regional communities

The Plan has a goal of enabling better weather data for regional communities (p 44). The NSW SES sees this as an important goal and agrees that the Far West will benefit from any additional support for weather prediction services. This in combination with improving the water level gauge network in the Far West will enable better flood prediction. This will assist the NSW SES in preparing communities for inevitable floods and storms, and in its flood and storm response operations.

Actions 15.4, 15.5 and 15.6

Action 15.4 of the Plan identifies that developments, including new urban release areas, should be located away from areas of known flooding hazards, to reduce the community's exposure to natural hazards. The NSW SES applauds this action, but recommends that the full range of flood risk be considered in any decision that relates to action 15.4.

Where information on the full range of flooding is not available, mapping flooding up to and including an extreme flood should be undertaken. To truly understand the flood risk for an area, a local plan should have an appreciation of flooding above the 1% AEP (or 1 in 100 year average recurrence interval) flood. Although it is difficult to determine the extent of the probable maximum flood in western NSW catchments, modelling an appropriate extreme flood scenario would help guide any decisions relating to development impacted by flooding. By doing this the state government and council will have an appreciation of a greater range of flood risk that could impact the communities in the Far West and make appropriate development decisions.

Action 15.5 which requires flood studies and floodplain risk management studies to be updated in accordance with the floodplain development manual should include mapping of flood extents above the 1% AEP (or 1 in 100 year average recurrence interval) flood. Where no flood study or floodplain risk management study/plan exists for an area, this should be undertaken to understand the flood risk to the community.

The NSW SES supports action 15.6 of incorporating the best available hazard information in local plans. Where no hazard information exists, this should be prioritised as part of action 15.5.

Recommendations

1. In addition to the goal of *better weather data for regional communities*, the NSW SES recommends that there should be a goal to improve the water level gauge network in the Far West regional communities to enable better flood prediction. This would assist the NSW SES in preparing communities for inevitable floods and storms. It would also assist in achieving communities resilient to flooding.
2. The NSW SES recommends that in updating flood studies and undertaking new flood studies, that the flooding extent be considered up to an appropriate extreme flood event. This will help to establish the extent of flooding and flood risk of the communities in the Far West.
3. The NSW SES recommends that in any development assessment relating to land impacted by flooding in the Far West, that there is consideration of the full range of flood risk up to and including an appropriate extreme flood event. This will assist a decision maker to understand the flood risk and plan appropriately to address that flood risk.

Concluding Remarks

Thank you for the opportunity to provide a submission on the *Draft Far West Regional Plan*. The Plan has ambitious goals in relation to understanding and incorporating flood risk, which the NSW SES supports.

The Plan has identified that deficiencies currently exist in understanding flood risk in the Far West. To improve the resilience of communities in the Far West to flooding, there should be: (i) an improved water level gauge network; (ii) improved understanding of flood risk through updating flood studies and floodplain risk management studies and where necessary undertaking new flood studies or floodplain risk management studies and plans; and (iii) consideration of the full range of flood risk up to and including an appropriate extreme flood event in any development assessment relating to land impacted by flooding in the Far West.

Thank you for considering the NSW SES submission. Please contact Marcus Morgan on (02) 4251 6665 if you wish to discuss any of the matters raised in this correspondence further.

Yours sincerely,



Nicole Hogan

A/Director, Emergency Management

NSW State Emergency Service

Cc: A/Commissioner

Manager Emergency Risk Management;

Planning Coordinator

