

INQUIRY INTO RESPONSE TO MAJOR FLOODING ACROSS NEW SOUTH WALES IN 2022

Organisation: Floodplain Management Australia

Date Received: 13 May 2022



Floodplain Management Australia

Supporting Wise Planning and Development
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13 May 2022

The Select Committee on the Response
to Major Flooding across NSW in 2022
Legislative Council
Parliament of NSW
(Submitted on line)

Dear Committee Members

Submission – Response to Major Flooding across NSW in 2022

Thank you for the opportunity to contribute to the Inquiry into the major flooding across NSW in 2022.

About Floodplain Management Australia

Floodplain Management Australia (FMA) is the peak national body for flood risk practitioners in Australia. FMA promotes wise management of development on floodplains, and community awareness of flood-related issues, helping to reduce the risks of flooding to life and property. FMA provides professional development and information sharing opportunities and represents the interests of Local Government at state and federal levels. Members include over 170 councils, catchment management authorities, government agencies, businesses and professionals involved in all aspects of urban and rural flood risk management.

Our members are at the front-line of flood risk assessment, flood management planning, decision making, emergency management and community engagement – please see: floods.org.au

FMA has strong partnerships with key State/Territory and Commonwealth Government agencies including NSW State Emergency Service, NSW Department of Planning and Environment, ACT State Emergency Service, Victorian Department of Environment, Land, Water and Planning, Queensland Reconstruction Authority and the Bureau of Meteorology. In addition, we have links to equivalent organisations in the United States, the United Kingdom and New Zealand. Our international network is invaluable in sharing flood management experience and expertise from other nations with our members for the benefit of their communities.

FMA National Conference

FMA convened its first annual Conference in 1961, to promote sound and responsible flood risk management, and the Conference continues to be the primary means of assisting Local Government and flood professionals achieve best practice management of flood risks.

This year's Conference, *Integrated Floodplain Management: Creating safer, stronger communities*, will be held at Toowoomba, Queensland, from 17 to 20 May. The program will include extensive discussion of recent flooding events by experts from across Australia, and may be of assistance to members of the Select Committee – please see: floodplainconference.com

The 2022 Floods

The 2022 east coast floods affected unusually large areas of the state, and some locations such as Lismore experienced their worst flood in recorded history. Many areas were flooded on multiple occasions, but could have been protected had appropriate pre-emptive actions been taken. FMA's

submission focuses on preparation for floods, and resource allocations for activities to reduce flood risks.

Preparing for Floods

The Insurance Council of Australia's news release of 3 May 2022 states "The recent flood event is estimated to be Australia's costliest flood ever. Using actual claims costs from 197,000 claims across both states, the event is estimated to have cost \$3.35 billion in insured losses."

However flooding from rivers and local catchments is the most manageable of natural disasters, and FMA has consistently advocated reducing the costs of flood disaster response, recovery and reconstruction by implementing well planned pre-emptive actions.

These include well designed and maintained mitigation works to manage existing risks, sound land use planning based on reliable flood data to avoid future risks, and development of more resilient communities to deal with unavoidable risks.

FMA's Local Government members have been diligently striving to reduce their flood risks, however they have consistently identified the following as the highest priority issues which need to be addressed to enable the necessary outcomes to be achieved:

- There is inadequate funding for flood studies, and development and implementation of risk mitigation projects
- More technical and land use planning guidance is needed.

These issues are addressed below.

Funding for Flood Risk Mitigation

At present Australia's expenditure on post flood clean up and recovery far outweighs the investment on pre-emptive measures, with around 97% of natural disaster expenditure on recovery and just 3% on planning and mitigation.

FMA supports the recommendation of the 2014 Productivity Commission Inquiry into Natural Disaster Funding Arrangements for Commonwealth Government investment in pre-disaster initiatives to be increased to \$200 million per year, to be matched by the States and Territories.

Our members have implemented a range of flood mitigation and management measures which have led to substantial savings in flood damages and recovery and reconstruction costs. Just one example is the Deniliquin levee which for a \$15.8 million investment will avoid \$85 million in flood damages in a flood which has a 1 in 100 chance of occurring in any one year.

Reduction in flood risks should also provide immediate financial community benefits, in the form of lower costs of flood insurance. There have been several examples of public mitigation leading to reduced flood insurance premiums. These include the Queensland towns of Roma, St George and Charleville where levees were constructed to provide protection from frequent flood events.

Other risk reduction measures such as property buy-backs and house-raising, as well as the development and implementation of planning and building controls/codes which support flood compatible building, also can require significant funding allocations.

The requirement for matched funding contributions from Local Governments for studies and works is a major concern for many councils which have limited financial capacity to meet increased funding obligations. There is a need for flexibility for projects with a significant cost-benefit ratio to be funded without matching Local Government funding.

Technical Guidance

FMA Members have consistently identified that councils need direct assistance in the implementation of the floodplain management process. Not just funding, but more technical support and project management assistance.

Guidance is provided by a limited number of very experienced experts from the Department of Planning and Environment (DPE), and also by the *NSW Flood Prone Land Policy* and *Floodplain Development Manual*.

Our council members are very appreciative of the assistance provided by DPE's dedicated flood program staff, and these comments should not be construed as criticism of the efforts of current staff, however their effectiveness is hampered due to under-resourcing. There has been a steady decline in the number of government floodplain management specialists over the last 25 years. Prior to the late 1990s the NSW Floodplain Management Program was core business of the Department of Public Works, but since then this role has been passed through various agencies, to its present downsized position buried within DPE.

Recent events have demonstrated the need to understand the complexities of flooding, and to develop cost effective solutions in a timely manner. This should be an ongoing high priority of the NSW Government, and FMA considers the current DPE technical expertise needs to be expanded substantially to support councils in management of their present and future flood risks.

After a lengthy and complex review of the current *Floodplain Development Manual* DPE released the draft *Flood Risk Management Manual and toolkit* for comment earlier this year. This new set of documents contains valuable guidance to assist councils in management of their flood risks, and DPE is to be congratulated on undertaking this project.

FMA is very supportive of this revised Manual, and has provided comments on the draft documents and some recommended refinements, which we believe will assist in producing a more robust and effective set of guidance.

Land Use Planning and Building Controls

FMA endorses a holistic approach to flood risk management which includes, in addition to physical infrastructure, land use planning and building controls.

Attention has been given to improving the understanding of flood risk management among land use planners in recent years, however there remains a lack of detailed knowledge within the profession. To assist in remedying this situation FMA developed the FMA Position Policy ***Flood Risk Management in Land Use Planning*** in 2014/2015. The current edition was adopted by the FMA Membership in 2021, and is attached at **Appendix 1**.

The most significant change that has occurred in flood risk management (FRM) practice over the last 36 years is a movement away from a singular flood standard to a risk management based approach. For example the level of a 1 in 100 chance per year flood (or 1 in 100 Annual Exceedance Probability (AEP) flood), plus freeboard, might remain the typical standard for residential floor levels in most locations, but higher floor levels could be appropriate for more sensitive land uses and emergency management considerations across the range of land uses in all floods.

Also, in catchments where there are large ranges in flood depths, there exists the potential for substantial risk to life and flood damage between 1 in 100 chance per year flood level and the Probable Maximum Flood level. Planning policies need to support the use of appropriate risk-based controls for development above the 1 in 100 chance per year flood level in such circumstances.

We are conscious of the difficult debate occurring in the Northern Rivers region of NSW, in particular at Lismore, in regard to whether homes and businesses should be rebuilt or relocated. These should be mandatory considerations for Floodplain Risk Management Studies where such

consequences are identified in situations including extreme floods, in order that these complex decisions can be pre-emptively made. This would provide a platform for better strategic planning of areas subject to high flood risks.

FMA has also recently completed a draft Position Policy: *Consideration of Climate Change Flood Risk in Land Use Planning*, which will be presented to members at the FMA National Conference in May 2022. Please see **Appendix 2**.

There are some differences in approach between the FMA *Flood Risk Management in Land Use Planning* Policy and the new draft *Flood Risk Management Manual* and we have offered to assist in resolving these issues with DPE.

Conclusion

FMA considers that improved preparation for floods is essential for building safer, more flood resilient communities, and this can only be achieved by allocating increased funding and technical assistance to Local Government Councils to enable them to expedite effective mitigation, planning and community engagement programs.

FMA brings together expertise and experience from all aspects of flood protection, preparedness, response and recovery from across Australia, which we would be pleased to contribute further as the Inquiry progresses.

Yours Faithfully

Ian Dinham
President

Attachment 1: FMA Position Policy ***Flood Risk Management in Land Use Planning***

Attachment 2: Draft FMA Position Policy ***Consideration of Climate Change Flood Risk in Land Use Planning***

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