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ABN: 39 638 876 538



Reference: 020-20 SJ

Thursday, 25 June 2020

**Re: Flood Prone Land Package**

To whom it may concern,

Thank you for the opportunity to comment on the Flood Prone Package being prepared for councils for consideration of flooding in land use planning. The Sydney Coastal Councils Group (SCCG) supports greater guidance being developed by the NSW Government to assist our member Councils build resilience in communities located in flood risk areas and reduce the extent of property damage and potential loss of life from flooding.

The Sydney Coastal Councils Group (SCCG) is a regional organisation of Councils that advances sustainable management of Sydney's urban coastal and estuarine environment. We currently comprise nine member Councils who represent 1.3 million Sydneysiders. One of our key goals is for people and places to adapt to a changing climate and future shocks and stressors.

We have reviewed the package of draft material that has been developed to support Councils which includes a revised planning circular, revised Local Environmental Plan flood clauses, and a new guideline titled *Considering Flooding in Land Use Planning*.

A key issue is the apparent omission with regards to catchment flooding and tidal inundation in these documents and we seek clarification. This is despite:

1. These being defined as a coastal hazard in s. 4(1) of the *Coastal Management Act 2016*
2. Planning Circular – Planning for Coastal Hazards (19-006) stating that *when assessing the risk of a current or future coastal hazard, councils and other consent authorities have discretion to consider:*  
  
*“any relevant floodplain risk management plans or estuary management plans prepared by or on behalf of a council or public authority that take into account tidal inundation in combination with catchment flooding.”*
3. The NSW Coastal Manual requiring Coastal Management Programs to *“identify relevant coastal processes acting singularly or in combination, which affect coastal hazards, including ... catchment characteristics and flows and the potential for river floods to coincide with extreme oceanic events.”*

It also appears to be a missed opportunity to update requirements around determining sea level rise predictions as these are important in any flood modelling in the coastal

zone. Sea level rise predictions are important in flood modelling as it determines how quickly stormwater can be discharged by pipe to the ocean and subsequently how much water backs up and causes inland flooding. This also determines how resilient an area is to flooding which I understand is a focus on the flood prone land package.

If you have any queries, please contact me by email at [executiveofficer@sydneycoastalcouncils.com.au](mailto:executiveofficer@sydneycoastalcouncils.com.au) or by phone (0407733075).

Yours sincerely,

A handwritten signature in cursive script that reads "Sarah P Joyce".

Sarah P Joyce  
**Executive Officer**