



7 August 2015

Department of Environment Land Water and Planning
PO Box 500
East Melbourne Vic 3002

Ask for: Kathleen McClusky
Phone: 9932 1004
Our Ref: A2187036

Dear Sir/Madam,

Revised draft Floodplain Management Strategy

Hobsons Bay City Council welcomes the opportunity to provide feedback to the revised draft Floodplain Management Strategy.

Council broadly supports the direction of floodplain management in Victoria however; the strategy raises a number of issues which are provided in the attached submission.

Thank you for the opportunity to comment and I trust that the attached document provides valuable input.

If you would like to discuss this submission further, please contact Kathleen McClusky, Manager Strategy and Advocacy on 9932 1004 or email kmccclusky@hobsonsbay.vic.gov.au.

Yours sincerely,

Natalie Walker
Director Strategic Development

Response to the revised draft Floodplain Management Strategy

A regional approach

A regional approach is supported and provides a good opportunity to make the most efficient use of resources. It also allows a greater understanding of the issues affecting flooding and can more easily identify solutions. Most importantly, it provides a consistent approach to the implementation of flood management policy across all municipalities, and is not reliant on local councils to have the resources to implement them individually. The study contains inconsistencies, in some cases recommending the adoption of a regional approach to flood management and policy, whilst alternately encouraging a local approach. Floods do not consider municipal borders and so the management of flood risk should not be constrained by municipal borders or regional boundaries.

In addition, a regional approach to flood mitigation infrastructure (and maintenance) would allow a holistic understanding on the implications of implementing flood mitigation measures further downstream or further along the coast. This may in turn identify cost saving opportunities and better resource allocation.

It is recommended that a regional approach to flood management be encouraged throughout the strategy.

Focus on riverine flooding

Hobsons Bay has six waterways running through it (including Skeleton Creek, Laverton Creek, Cherry Creek, Kororoit Creek, Stony Creek and the Yarra River) and approximately 23 kilometres of coastline.

The strategy relies heavily on flooding matters that relate to riverine flooding, however, is limited on flooding from coastal tide and storm surge flooding. The strategy states that coastal flooding will be covered by the Victorian Coastal Strategy. It is assumed that, as both of these strategies cover flooding issues, these strategies will jointly address the issues around the combined impact of riverine flooding and coastal flooding, sea level rise and storm surge on each other and on settlements. Currently this information is missing from the combined strategies.

It is recommended that this issue be addressed in the Floodplain Management Strategy.

Climate impacts

Some recognition has been given to the impacts of climate change on flooding frequency and intensity. This has not been consistent throughout the strategy.

It is recommended that the strategy consistently recognise and plan for the management of climate change impacts on riverine flooding, coastal flooding, sea level rise, storm surge and the interactions between these flooding types.

Costs of building and maintaining flooding infrastructure

The strategy states that the Victorian Government will be responsible for building flooding infrastructure and that local councils will be responsible for maintaining it. It also goes on to state that local councils will be liable for the failure of that infrastructure if it is maintained.

Many local councils do not have the financial or technical resources to maintain and manage flooding infrastructure. It is therefore unreasonable to expect that the Victorian Government paying for flooding infrastructure and local councils maintaining flooding infrastructure should be considered best practice.

Local councils cannot accept, and are not legally required to accept, responsibility or liability for infrastructure built by other governments and their agencies unless there is a prior agreement in writing signed by the relevant parties. It is recommended that the strategy be updated to reflect this.

General cost of flood infrastructure

The strategy identifies Catchment Management Authorities and Melbourne Water as playing a partnership role with local councils in flood management of rivers and estuaries. However, it is unclear why the draft strategy stipulates that these authorities will play only a supportive role in respect to coastal flooding. The deficit of this partnership opportunity would result in a significant additional resource requirement for local councils.

As the draft strategy states, most Victorians utilise the coast. This suggests coastal municipalities are required to support infrastructure (including flood mitigation infrastructure) that benefits the state as a whole, with only a supporting role from Victorian Government agencies. This document identifies a shift in responsibility of coastal inundation matters from state and regional responsibility to a local responsibility.

Local councils do not have the technical or financial resources to take on these responsibilities.

Recognising the role of the Flooding Authority

Throughout the strategy and particularly in relation to Section 13, the strategy fails to recognise the role of the Flooding Authority in:

- developing and updating flood mapping within their catchment areas
- identifying areas of priority for flood mapping
- developing strategic plans to address known flood risks, including the safety of access ways
- submitting applications to amend planning schemes when new or changed flooding levels become available

Melbourne Water is the responsible Flooding Authority in the Melbourne metropolitan region. Local councils do not have the technical or financial resources to take on the responsibilities of Melbourne Water in relation to this matter.

It is recommended that the strategy adequately recognises the role of the Flooding Authority in providing and updating flood mapping and submitting applications to amend the planning scheme as required when new information becomes available.

Flooding recognition in planning policies

The draft strategy states that strategies for mitigating flooding risk should be contained in the Municipal Strategic Statement. Floods do not recognise municipal borders and planning needs to be coordinated across regions for effective flood management to be effective. As such, it is recommended that the State Planning Policy Framework (SPPF) is a more appropriate place to contain these strategies.

Integrated catchment management

Council supports the decision to recognise the role that Integrated Catchment Management (ICM) and Water Sensitive Urban Design (WSUD) can play in reducing flood risk. It is noted however, that only developments that fall under clause 56.07.4 of the Victorian Planning Provision are required to implement ICM and WSUD solutions. Further, currently under this legislation, these developments are only required to treat runoff from pre-development levels for the one year annual reoccurrence probability. This is insufficient to have any real impact on flood risk.

It is recommended that the strategy recognises the need to strengthen current state planning regulation in order for ICM and WSUD to become effective flood risk reduction tools.

Community education and information

Educating the community on flooding issues is an important way to address flood management. It reduces the impact of flood events, builds community resilience and increases recovery capacity. Currently, multiple agencies educate the community on how best to deal with flooding issues, including the State Emergency Service, Melbourne Water and local councils. All of these agencies provide information about how to prepare for flooding incidents and provide information at times of events. A coordinated approach to community education, awareness, warnings and information is required to ensure there is no duplication or conflicting information provided to the community.

It is recommended that the strategy implement a framework for authorities to work together on community education, awareness and information sharing.

