

**‘Allfarthing’ 2 Brisbane Grove
Pre-Gateway Planning Proposals (updated advice to DPHI)
Goulburn Mulwaree Council**

**DCCEEW-BCS
Water Floodplains and Coast (WFC)
25 June 2024**

Floodplain Risk Management Comments:

The planning proposal involves the rezoning of flood prone land at 2 Brisbane Grove and to address flooding issues the “Brisbane Grove Planning Proposal – Flood Assessment Rev B, GRCHydro December 2023” has been provided. We have interpreted this report to be the flood impact and risk assessment (FIRA) previously advised should be prepared to demonstrate consistency with Section 9.1(2) Direction 4.1 and the NSW Government’s Flood Prone Land Policy as set out in the Flood Risk Management Manual (2023).

The proposal now seeks to rezone the existing RU6 Transition to R5 Large Lot Residential and apply a C2 Environmental Conservation to the flood planning area. For lots situated between the flood planning area and the PMF, the FIRA establishes that future proposed building envelopes will not be permitted within the probable maximum flood (PMF) floodplain through a provision in the Section 88B certificate of the flood effected land titles. As this instrument is not affected through this planning proposal process, the planning authority should satisfy itself that the proposed approach will ensure the intended outcome of all new homes being built above the PMF. It should also be satisfied that the flood related public safety and emergency management issues including evacuation and frequency of isolation have been adequately addressed.

The FIRA has included a joint probability analysis of what it terms secondary risks and refers to the requirements of the Rural Fire Service and Ambulance NSW. The FIRA however has not demonstrated that it addresses the requirements of the NSW State Emergency Service, the statutory agency responsible for flood related emergency management considerations. The FIRA has not demonstrated that new residential sites can be evacuated prior to becoming isolated and the advice from the NSW SES should be considered by the planning authority.

Given the increased number of similar planning proposals in the area south of the Hume Highway at Goulburn, the planning authority needs to consider the cumulative impacts associated with the increased occupation of land for residential use and issues linked to flood isolation. Although the FIRA supporting the planning proposals indicate that new houses may be above the PMF, the flood isolation issue has not been addressed and is likely to result in an increase in government spending on emergency management services, flood mitigation and emergency response measures, particularly flood free road access.