

# ENGAGEMENT REPORT

Section 73(7) of the *Planning, Development and Infrastructure Act 2016*

## Flooding Hazards Mapping Update Code Amendment

By the Chief Executive, Department for Trade and Investment  
(the Designated Entity)



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# 20192501

	<b>Name / Title</b>	<b>Date</b>	<b>Signature</b>
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# 1 Executive summary

The Flood Hazard Mapping and Assessment Project (the Project) was initiated in 2021 and aims to deliver more consistent and contemporary mapping of riverine and flash flood hazards across South Australia.

The Project will be delivered in three stages:

- Stage 1 – Flooding Hazards Mapping Update Code Amendment (this Code Amendment)
- Stage 2 – Preparation of Flood Hazard Mapping Products
- Stage 3 – State-wide Flood Hazard Code Amendment (State-wide Code Amendment)

The Flooding Hazards Mapping Update Code Amendment (the Code Amendment) is the first stage in the Project and seeks to:

- a) reduce the extent of the existing Hazards (Flooding - Evidence Required) Overlay for 12 local government and Outback area townships where more recent flood studies and flood hazard mapping is available
- b) apply the Hazards (Flooding - Evidence Required) Overlay to the north-eastern portion of the Port Adelaide Enfield Council area, until the flood hazard mapping being prepared in Stage 2 of the Project, can be implemented into the Code

Community engagement on the draft Code Amendment was undertaken for a period of eight weeks, from 22 February to 21 April 2023, giving South Australians, impacted communities and key stakeholders the opportunity to have their say on the proposed amendments.

Of the 20 submissions received 11 of the responses were from Councils, 3 were from State agencies, 1 from a Member of Parliament and 5 from members of the public and the planning and development industries.

From the 20 submissions received, 17 (85%) either supported or did not object to the Code Amendment outcomes and 3 (15%) raised concerns with either the Code Amendment outcomes or the broader Code policies.

Out of scope matters such as changes to the flood hazard overlay policies in the Code will form part of the investigations for the proposed State-wide Code Amendment.

Feedback received from community engagement:

- (a) demonstrated general support for the Code Amendment;
- (b) raised matters such as timing and progress of the proposed State-wide Code Amendment;
- (c) sought clarification on mapping methodology and data used to inform the mapping updates;
- (d) recommended that the Overlay be retained in built up urban areas within Metropolitan Adelaide where flood studies are currently being undertaken or proposed to be undertaken.

Further investigations regarding the use of coarse regional mapping in urban areas was undertaken in response to the feedback received during community engagement. Discussions were also held post engagement with the Department for Environment and Water to determine the data's accuracy.

As a result of these investigations, the Hazard (Flooding – Evidence Required) Overlay (the Overlay) was reinstated in built up urban areas located within activity and neighbourhood type zones and where there is no local knowledge or detailed flood study available to support the removal of the overlay in a specific area.

Correctly applying the Overlay in the Planning and Design Code (the Code) will make certain the flood policies in the Code are applied to the right areas and not unnecessarily applied where it can be shown that

there is minimal risk of flooding. This will help to further improve the development assessment process and provide greater certainty for applicants undertaking new development. Improving the accuracy of flood hazard mapping will also help to better inform the future rezoning of land, and the preparation of regional plans and emergency management plans.

## 2 Purpose

This Engagement Report (the Report) has been prepared by the Chief Executive of the Department for Trade and Investment (the Designated Entity) for consideration by the Minister for Planning (the Minister) in determining whether to adopt the Flooding Hazards Mapping Update Code Amendment (the Code Amendment).

The report has been prepared in accordance with Section 73(7) of the *Planning, Development and Infrastructure Act 2016* (the Act) and Part 6 of Practice Direction 2: Preparation and Amendment of a Designated Instrument (Practice Direction 2) and includes:

- details of the engagement process undertaken
- a summary of the feedback received
- a response to the feedback
- an evaluation of the effectiveness of the engagement and whether the principles of the Community Engagement Charter have been achieved.

The report also confirms that engagement has been undertaken in accordance with the Engagement Plan, prepared under part 2(5) of Practice Direction 2.

## 3 Introduction

Flooding has the potential to impact our safety and built environment within South Australia. Flood hazard overlays seek to minimise or mitigate the risks of flooding hazard by protecting people and property from the impact of flood events by avoiding development in high-risk areas and seeking suitable design responses in lower risk areas.

The flood hazard overlays currently in the Code were created using the flood mapping contained in Development Plans (25 councils) and other flood mapping sources that were being used to support the assessment of development (19 councils) prior to the introduction of the Code.

The Overlay in the Code was applied as a precautionary measure to areas that did not have flood mapping or were not able to provide flood mapping in time for the initial implementation of the Code.

The Flood Hazard Mapping Project (the Project) was initiated in 2020 and will be delivered in three stages:

- Stage 1 – Flooding Hazards Mapping Update Code Amendment (this Code Amendment)
- Stage 2 – Preparation of Flood Hazard Mapping Products
- Stage 3 – State-wide Flood Hazard Code Amendment (State-wide Code Amendment)

In order to inform the Code Amendment, flood hazard mapping products were commissioned:

- Regional coarse flood data is comprised of Australia-wide flood hazard mapping at a scale of both 30m and 5m. The 5m data is available in metropolitan and outer Adelaide plus the Southeast of South Australia. The 30m data covers the remainder of the State. This data has been used to cover gaps where detailed flood studies do not currently exist or are not being proposed as part of the project. This data will be used to determine the level of flood hazard that exists in parts of the state and remove the Hazards (Flooding - Evidence Required) Overlay where it can be determined that an area is not subject to flood risk and a flood overlay is not required. This data has been used to prepare mapping for the Flood Hazard Mapping Update Code Amendment and will also be used in the State-wide Code Amendment.

On the 28 October 2021 the then Minister for Planning approved the Proposal to Initiate for the Flood Hazard Mapping Update Code Amendment. The Code amendment seeks to update the extent of the Overlay within the following Local Government Areas, where it has been confirmed that there is minimal risk of flooding based on detailed flood studies:

- City of Burnside – (1st to 3rd Creek Flood Study)
- District Council of Clare & Gilbert Valleys – (Auburn Township)
- City of Mitcham – (Sturt River Urban Catchment, McLaren Street Catchment, Brown Hill Keswick Creek Urban Catchment)
- District Council of Naracoorte
- City of Playford – (Smith Creek)
- City of Port Adelaide Enfield – (Barker Inlet Study & Dry Creek Study)
- City of Port Lincoln – (Stormwater Study)
- City of Salisbury – (Dry Creek Study)

The extent of the Overlay was also updated where coarse regional flood mapping or local knowledge confirmed that there is minimal risk of flooding within the following Local Government Areas and Outback area townships:

- City of Mt Gambier
- City of Onkaparinga
- City of Port Adelaide Enfield (Correcting an error in application)
- City of Port Lincoln
- Outback Areas townships including Andamooka, Arkaroola, Beltana, Blinman, Bookabie, Coober Pedy, Copley, Fowlers Bay, Innamincka, Leigh Creek, Lyndhurst, Marree, Nepabunna, Oak Valley, Olympic Dam, Oodnadatta, Parachilna, Roxby Downs, Woomera, Yalata; and nine APY Lands sites - Amata, Fregon, Indulkana, Kalka, Mimili, Mintabie, Pipalyatjara, Pukatja/Ernabella, Watarru.

The Code Amendment applies to 11 local government areas and several Outback Areas across the State. The Code Amendment seeks to update the spatial extent of the Hazards (Flooding - Evidence Required) Overlay in the Code by:

- a) reducing the extent of the overlay within 11 local government areas and several townships within the Outback Areas of the State; and
- b) applying the Hazards (Flooding - Evidence Required) Overlay to the north-eastern portion of the Port Adelaide Enfield Council area.

It is not proposed to remove the existing Hazards (Flooding - Evidence Required) Overlay if any of the following applies:

- a) there is no flood mapping or data showing that there is a minimal risk of flooding
- b) the available flood mapping or data can not be relied upon to accurately define the potential flood risk because of the age, scale or accuracy of the mapping
- c) recent detailed flood studies and flood hazard mapping has identified that a potential flood risk exists.

The Overlay will remain in these areas as a precautionary measure to provide a policy framework that can be used to address potential flood risk in areas.

The proposed amendment will improve the accuracy of flood hazard mapping and help to apply the correct policies to the right areas. This will allow for the existing policies in the Code to be focused on the protection of development within areas identified as having a flood hazard.

Furthermore, development applications in areas that have been identified as having a minimal risk of flooding, will no longer be captured by a hazards flooding overlay. This advancement will enable quicker assessment processes for applications and provide greater certainty for development applications by simplifying the assessment process and providing greater opportunities for deemed-to-satisfy (DTS) development applications in areas that have been identified as having a minimal risk of flooding. Alternatively, additional flood policies will be applied and the DTS pathway won't apply to development in those parts of the Port Adelaide Enfield Council area, where the Overlay is being applied.

Improving the accuracy of flood hazard mapping will also help to better inform the future rezoning of land, and the preparation of regional plans and emergency management plans.

This Code Amendment is the first step in the Project and will complement the proposed State-wide Code Amendment being led by the Commission. This will seek to introduce the new and enhanced mapping, prepared in Stage 2 of the Project, into the Code and South Australian Property and Planning Atlas (SAPPA).

The State-wide Code Amendment will include a review of existing flood policies within the Code and seek to introduce a new policy framework, which can be used to better manage the assessment of development in areas affected by flood hazard. The new policy framework will continue provide protection for people, property and the environment from the impact of flood events by ensuring the policies in the Code can be used to avoid specific developments in high-risk areas and achieve a suitable design response in lower risk areas.

The new flood hazard policies and mapping introduced in the State-wide Code Amendment will be more detailed and accurate than existing mapping and better reflect the level of flood hazard that exists throughout the State. In addition to this, the new policy framework will provide greater opportunities for DTS development applications across the State by ensuring flood hazard policies are not unnecessarily applied in areas that are shown to have a minimal risk of flooding. This will be achieved by making further changes to the extent of the Overlay, which was originally applied, as a precautionary overlay, where the flood risk was unknown.

## 4 Engagement Approach

The process for amending a designated instrument (including the process to amend the Code is set out in the Act. The Act requires community engagement to take place in accordance with the Community Engagement Charter (the Charter).

The Designated Entity prepared an Engagement Plan (the Engagement Plan) to apply the principles of the Charter.

The purpose of this engagement was to:

- Ensure stakeholders and the community are aware that changes are proposed to the Code as it relates to the affected area
- Inform stakeholders and the community of the changes being proposed by the Code Amendment
- Obtain stakeholder and community input and feedback in relation to the proposal
- Inform participants in the engagement process of the outcome and final decision in relation to the proposal.

The engagement activities outlined below occurred as set out in the Engagement Plan and it was not necessary to alter the scope or level of community engagement outlined in the Engagement Plan.

### 4.1 Engagement Activities

The following engagement initiatives were undertaken:

#### Pre-consultation engagement

Pre-consultation engagement in the form of meetings and correspondence occurred with all councils affected by the spatial changes in this Code Amendment. There are 13 councils affected by the Code Amendment and all agreed to their local government area being included within the scope of the Code Amendment.

The councils affected by this Code Amendment, are:

- Burnside, Coober Pedy, Clare and Gilbert Valleys, Mitcham, Marion, Mount Gambier, Naracoorte Lucindale, Onkaparinga, Playford, Port Adelaide Enfield, Port Lincoln, Roxby Downs, and Salisbury.
- The Outback Areas townships affected by this Code Amendment are: Andamooka, Arkaroola, Beltana, Blinman, Bookabie, Coober Pedy, Copley, Fowlers Bay, Innamincka, Leigh Creek, Lyndhurst, Marree, Nepabunna, Oak Valley, Olympic Dam, Oodnadatta, Parachilna, Roxby Downs, Woomera, Yalata; and nine APY Lands sites - Amata, Fregon, Indulkana, Kalka, Mimili, Mintabie, Pipalyatjara, Pukatja/Ernabella, Watarru.

In addition, councils and other stakeholders were informed of the Code Amendment through regular online forums and the Planning Ahead Newsletter. Information was also available on the PlanSA portal via the [Hazard Mapping Project](#) webpage.

The Flood Hazard Mapping and Assessment Project Management Committee was established to deliver the Project, and has actively participated in preparing this Code Amendment.

The Committee:

- Championed the project and raises awareness within their respective State Agency
- Reviewed strategies, the implementation plan, project scope and milestones

- Resolved strategic and policy issues
- Communicated with other key organisational representatives.

The Committee comprised of representation from:

- The Department for Environment and Water
- The State Emergency Service South Australia
- The Stormwater Management Authority
- The Local Government Association South Australia

### **Engagement with the councils directly affected by the Code Amendment**

Engagement was undertaken with staff from the councils directly affected by the Code Amendment regarding the reasons for the Code Amendment and planned community engagement. Council staff were provided with access to engagement collateral prior to the commencement of formal community engagement.

### **Direct notification and written invitation to provide a submission**

The following individuals and organisations were directly advised in writing or via email and invited to provide a submission on the proposed Code Amendment:

- State and Federal Members of Parliament for the local government areas directly affected by the Code Amendment:
  - 10 Federal Members of Parliament
  - 40 State Members of Parliament
- The Mayors of the councils directly affected by the Code Amendment
- Key State agencies within Government:
  - Department for Environment and Water (DEW)
  - Environment Protection Authority (EPA)
  - Infrastructure SA
  - Premier's Climate Change Council (PCCC)
  - Stormwater Management Authority (SMA)
  - South Australian Police (SAPOL)
  - South Australian Fire and Emergency Services Commission (SAFECOM)
  - State Emergency Services (SES)
  - State Emergency Management Committee (SEMC)
  - Department for Infrastructure and Transport (DIT)
- State Planning Commission
- Key Stakeholders:
  - Local Government Association of South Australia (LGA)
  - Australian Institute of Architects (AIA)
  - Australian Institute of Landscape Architects (ALIA)
  - Housing Industry Association SA (HIA)
  - Master Builders Association SA (MBA)
  - Planning Institute of Australia (PIA)
  - Property Council of Australia SA (PCA)
  - Urban Development Institute of Australia (UDIA)
  - Gawler River Floodplain Management Authority

## Email and telephone enquiries

The PlanSA contact details were communicated and provided throughout the community engagement period and stakeholders were invited to meet with PLUS staff if desired.

- Phone: 1800 752 664
- Email: [plansa@sa.gov.au](mailto:plansa@sa.gov.au)

## Community engagement website (PlanSA portal)

The proposed Code Amendment documentation and supporting information was available publicly online for the duration of the community engagement period. The PlanSA portal was the primary platform for information and submitting feedback.

A news article and web banner promoting the community engagement were also published on the landing page of the PlanSA website, providing greater visibility and the following information:

- an overview of the Code Amendment
- the Code Amendment document
- a fact sheet outlining the proposed changes
- a set of 'frequently asked questions' about the Code Amendment
- an 'online map viewer' which displayed the parts of the state impacted by the Code Amendment was available publicly. People could also use an address search tool which enabled people to check whether their property was impacted
- a link to the PlanSA Eventbrite page to register for one of the community information sessions
- a submission form to provide feedback
- contact details for all enquiries.

## Availability of community engagement materials

The Code Amendment, engagement plan, community information sheet and a frequently asked questions document were available to view at the following places:

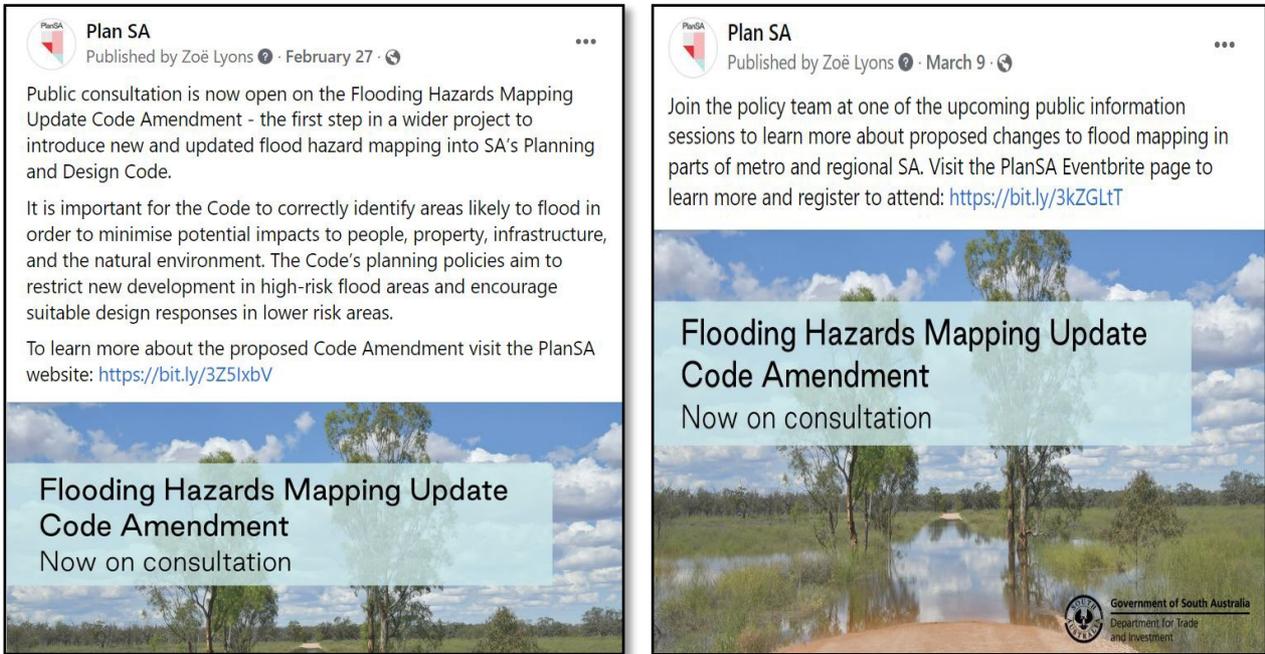
- Planning & Land Use Services, Level 10, 83 Pirie Street, Adelaide
- The civic offices of the councils directly affected by the Code Amendment

The draft Code Amendment document, fact sheet, frequently asked questions, engagement plan and online map viewer were made available electronically on the PlanSA website: [https://plan.sa.gov.au/en/code\\_amendments](https://plan.sa.gov.au/en/code_amendments).

Community engagement collateral was also provided to all participating councils for distribution at their discretion.

## Social media

A social media campaign was used to promote the community engagement. The campaign utilised “boosted” (paid) advertising across the key council areas impacted by this Code Amendment. The social media posts used to promote the engagement opportunity and encourage feedback throughout the engagement period, included the following:



The social media campaign received 184 ‘reactions’ and a majority of these reactions were positive.



## Print Advertising in local and regional papers

An advertisement about the community engagement was placed in the Sunday Mail on Sunday 10 March 2023 to cover the participating metropolitan council areas.

An advertisement was also placed in the following regional newspapers to cover the participating regional council areas:

- City of Mount Gambier - *The Border Watch*
- Naracoorte Lucindale Council - *Naracoorte Herald*
- City of Port Lincoln - *Port Lincoln Times*
- Clare & Gilbert Valleys Council - *Plains Producer*
- District Council of Coober Pedy and Roby Downs Council - *Coober Pedy Times*

**‘Flooding Hazard Mapping Update Code Amendment’ – public consultation now open**

Public consultation is open on the ‘Flooding Hazards Mapping Update Code Amendment’ - the first step in a wider project to introduce new and updated flood hazard mapping into SA’s Planning and Design Code.

To learn more about the proposed changes and affected areas visit the PlanSA website:

[plan.sa.gov.au/en/ca/floodmappingstageone](https://plan.sa.gov.au/en/ca/floodmappingstageone)



**Planning Ahead newsletter**

Planning Ahead is a public digital newsletter prepared by the Planning and Land Use Services division of the Department for Trade and Investment. It provides news about the planning system and has a subscriber base of just over 2,000 council, industry, and community contacts.

An article promoting the engagement opportunity was included in the February 2023 edition of ‘Planning Ahead’.

## Newsletter February 2023 Edition

### Consultation now open on Flooding Hazards Mapping Update Code Amendment



Public consultation is now open on the [Flooding Hazards Mapping Update Code Amendment](#) – the first step in a wider project to introduce new and updated flood hazard mapping into SA's Planning and Design Code.

It is important for the Code to correctly identify areas likely to flood in order to minimise potential impacts to people, property, infrastructure, and the natural environment.

The Code's planning policies aim to restrict new development in high-risk flood areas and encourage suitable design responses in lower risk areas. These policies are applied in the Code via 'overlays'.

The Flooding Hazards Mapping Update Code Amendment is focused exclusively on the 'Hazards (Flooding – Evidence Required) Overlay' in the Code.

This Code Amendment proposes to:

- reduce the extent of Hazards (Flooding - Evidence Required) Overlay in 12 local government areas and several Outback Areas where more recent flood hazard mapping has demonstrated that there is minimal risk of flooding; and
- apply the Hazards (Flooding - Evidence Required) Overlay to a portion of the Port Adelaide Enfield Council area, as a precaution, where the level of flood hazard has not yet been determined and until new flood hazard mapping can be implemented in future stages of the wider project.

Public consultation will be open for 8 weeks from 22 February to 22 April 2023.

This Code Amendment is the first step in a three-stage [Flood Hazard Mapping and Assessment Project](#) being undertaken to deliver more consistent and contemporary mapping of riverine and flash flood hazards across South Australia.

The Project will involve using new technology to deliver updated flood studies and modelling which will cover a range of flood events and consider the impact of both climate change and future development to 2050. The final stage of the project, which is expected to go on public consultation later this year, will involve the introduction of new flood mapping across the entire state.

### Community information sessions

The following community information sessions were held during the engagement period. Each information session was attended by PLUS Code Amendment team staff and Council staff were invited and attended these sessions.

Despite promotion across PlanSA and local council channels, the low turn-out to these community information sessions indicates that - as to be expected - the narrow and technical nature of this Code Amendment was not of significant interest to the wider community.

Date and time	Venue	Local government area catchment	Participation
15 March 2023,	City of Port Adelaide Enfield, Lights Community Centre	City of Port Adelaide Enfield	No attendees

5pm-7pm			
20 March 2023, 5pm-7pm	City of Onkaparinga, Onkaparinga Civic Centre	City of Onkaparinga, City of Marion	Attended by six staff members from the City of Onkaparinga with an interest in how this Code Amendment and the wider Flood Hazard Mapping Project will impact development assessment.
22 March 2023, 5pm-7pm	City of Mitcham, Mitcham Library	City of Mitcham, City of Burnside	Attended by one member of the community who also works in storm water management at a local council.
23 March 2023, 5pm-7pm	City of Playford, Playford Civic Centre	City of Playford, City of Salisbury	Attended by one community members
28 March 2023, 5.30pm-6.30pm	Online session (Zoom)	SA regional areas	Attended by two community members.
29 March 2023, 5.30pm-6.30pm	Online session (Zoom)	All/General	Attended by two community members.

The venues were set up with digital access to the online map viewer, several large information panels and additional supporting materials outlining the proposed Code Amendment, what the Code Amendment sought to achieve and how participants could obtain further information about the Code Amendment.

The community sessions provided the opportunity for participants to speak with members of the PLUS or alternatively decide to speak with someone from the PLUS at a later date.

Participants were advised that formal submission on the Code Amendment could be made through the PlanSA website or via email at: [plansasubmissions@sa.gov.au](mailto:plansasubmissions@sa.gov.au).

### Media Coverage

There was one media enquiry about this Code Amendment, however, there was no media coverage regarding this Code Amendment.

## 4.2 Mandatory Requirements

The following mandatory engagement requirements, relating to amending the Code (as prescribed in the Community Engagement Charter), have been met:

1. Notice and consultation with all councils directly affected by the Code Amendment.
2. Notice and consultation with the Local Government Association of South Australia

As specified by the State Planning Commission (the Commission) under section 73(6)(e) of the Act, the following stakeholders have been directly notified and provided with the opportunity to make a formal submission in relation to the Code Amendment:

1. Federal Members and State Members of Parliament
2. The mayors of the councils directly affected by the Code Amendment
3. State Agencies - Department for Environment and Water (DEW), Environment Protection Authority (EPA), Infrastructure SA, Premier's Climate Change Council (PCCC), Stormwater Management Authority (SMA), South Australian Police (SAPOL), South Australian Fire and Emergency Services Commission (SAFECOM), State Emergency Services (SES), State Emergency Management

Committee (SEMC), and the Department for Infrastructure and Transport (DIT), State Planning Commission

4. Professional Boards and Affiliates - Australian Institute of Architects (AIA), Australian Institute of Landscape Architects (ALIA), Housing Industry Association SA (HIA), Master Builders Association SA (MBA), Planning Institute of Australia (PIA), Property Council of Australia SA (PCA), Urban Development Institute of Australia (UDIA), and the Gawler River Floodplain Management Authority.

### **4.3 Compliance with the Engagement Plan**

The above-described activities were undertaken in accordance with the Engagement Plan.

It is noted that post-consultation activities set out in the Engagement Plan to 'Inform of outcome' and 'Closing the loop and reporting back' are still in progress, pending final determination of the Code Amendment.

## 5 Evaluation of Engagement

The engagement process for the Code Amendment was evaluated to ensure the principles of the Community Engagement Charter (the Charter) were met.

### 5.1 Performance Indicators for Evaluation

Performance indicators have been used to evaluate engagement on the Code Amendment. These measures help to gauge how successful the engagement has been in meeting the Charter's principles for good engagement.

The minimum mandatory performance indicators were used to evaluate the engagement and gauge how successful the engagement was in meeting the Charter's principles. These are that the engagement:

1. **Occurred early enough** for feedback to genuinely influence the planning policy, strategy or scheme.
2. **Contributed to the substance** of the final draft Code Amendment.
3. **Reached those identified** as communities or stakeholders of interest.
4. **Provided feedback to community** about the outcomes of the engagement.
5. Was **reviewed throughout** the process and **improvements put in place** or recommended for future engagement.

The evaluation of the engagement was undertaken by the PLUS Communications and Engagement team on behalf of the Designated Entity. The results of the evaluation are contained in **Attachment 1** to this Engagement Report.

### 5.2 Evaluation against the Charter principles

The following is a summary of the evaluation of the engagement against the five principles of the Charter.

#### (1) Engagement is genuine

*People had faith and confidence in the engagement process.*

All parties were genuine and honest in their participation. PLUS sought to be better informed by engaging with people who are affected by the Code Amendment and the broader community. This included a range of methods that sought to reach a large proportion of the community and key stakeholders. The information provided at consultation was easy to access and understand to ensure people are properly informed about the proposed changes and how they can provide feedback.

The feedback provided during community engagement process was primarily positive. however, most of the feedback related to the future State-wide Code Amendment or matters that were outside of the scope of this Code Amendment, including changes to flood policies, changes to the other flood overlays and changes to Council areas that are not part of this Code Amendment. The PLUS genuinely listened to the range of views and perspectives put forward and explained that while the scope of this Code Amendment is limited, it is the first step in the Flood Hazard Assessment and Mapping Project and advised that some of the issues raised would be considered as part of the future State-wide Code Amendment.

A consistent methodology was used when determining the proposed extent of the Hazard (Flooding – Evidence Required) Overlay and the flood studies and mapping used in the Code Amendment were the best available mapping and data at the time. The submissions, however, included feedback in relation to the age of the flood studies, and the scale and accuracy of the data being used in some areas. After consideration, it was concluded that the regional coarse Mapping may not be able to accurately define the potential flood risk in

built-up urban areas within metropolitan Adelaide and therefore it should not be relied upon to remove the Overlay.

The submissions also indicated that there may have been some confusion about the scope of this Code Amendment and the difference between this Code Amendment and the future State-wide Code Amendment. Some of this confusion arose because the scope of this Code Amendment was reduced to limit the impact of the first Code Amendment and clearly articulate the changes being sought in each Code Amendment. This highlighted the importance of clearly highlighting the scope of the Code Amendment and how the scope limits the ability to make post consultation changes based on the feedback provided. This feedback could be considered in future engagement planning.

## **(2) Engagement is inclusive and respectful**

*Affected and interested people had the opportunity to participate and be heard.*

The Flood Hazard Mapping and Assessment Project Management Committee (FHMA Committee) was established, early in the Project, to provide effective operational management oversight and coordination of the Project, including the deliverables and products required from it. The FHMA Committee was represented by government agencies and key industry stakeholders. PLUS undertook early engagement with the FHMA Committee, government agencies, key stakeholders and affected councils, to help shape the changes being proposed in this Code Amendment prior to community engagement.

The additional feedback received in the community engagement submissions was primarily positive and this support has contributed to the substance of the Code Amendment. The members of the FHMA Committee were directly notified and given the opportunity to participate in the community engagement process. The feedback received from members of the FHMA Committee has been considered by PLUS and resulted in changes to the draft version of the Code Amendment, which will be presented to the Chief Executive of the Department for Trade and Investment for approval.

Affected and interested people were provided with an opportunity to participate in the community engagement process, regardless of their background or status. People were invited/encouraged to participate at the start of the engagement process, so that their feedback was able to influence the outcome of the Amendment.

PLUS held two on-line information sessions and four in-person community sessions, at the City of Port Adelaide Enfield - Lights Community Centre, City of Onkaparinga - Onkaparinga Civic Centre, City of Mitcham – Mitcham Library and the City of Playford – Playford Civic Centre. The information sessions provided and opportunity for the local community to speak directly with staff from the PLUS, ask questions or discuss issues that they may have with the Code Amendment. All of the session were held between 5:00 and 7:00pm to provide the opportunity for participants to attend outside of normal business hours.

All of the views received during community engagement were considered when determining if changes to the Code Amendment were required.

## **(3) Engagement is fit for purpose**

*People were effectively engaged and satisfied with the process, and people were clear about the proposed change and how it would affect them.*

The proposed Code Amendment applies to 13 Local government areas and several outback area townships. The Code Amendment seeks to amend the extent of the Hazard (Flooding – Evidence Required) Overlay and does not seek to change Code policy. Given the number of properties affected by the Code Amendment, however, it was decided that a mix of broad and targeted engagement would provide the best opportunity to reach the greatest number of people. A mix of social media posts, media releases and online posts were used to inform the broader community, and Council websites and advertisements in local newspapers were used to target the specific communities affected by the proposed changes. In addition to this, the councils who are

affected by the Code Amendment, industry stakeholders, relevant State Government agencies and Members of Parliament were directly notified.

The engagement process provided the opportunity for participants to speak directly with staff from PLUS and ask questions or discuss issues related to the proposed amendment. The necessary information was provided to the community and made available on the SA Planning Portal and the community were able to access an online map viewer that showed a comparison between the current and proposed Hazard (Flooding – Evidence Required) Overlay.

The feedback during engagement indicated that the map viewer was an effective tool for informing the community about the changes being proposed. The online map viewer provided the opportunity for the community to locate a specific property or area to determine if the changes being proposed in the Code Amendment would affect them.

#### **(4) Engagement is informed and transparent**

*All relevant information was made available, and people could access it*

*People understood how their views were considered, the reasons for the outcomes and the final decision that was made*

All the relevant information required to participate fully in the engagement process was published on the Planning Portal for people to access. The Planning Portal included an overview of what was being proposed, why the Code Amendment was being undertaken and how to participate in the community engagement process. The information available on the Planning Portal included the Code Amendment, the Engagement Plan, the online map viewer and other supporting documents, such as, a community information fact sheet and a frequently asked questions document.

The submissions received indicated that the community were able to access and interpret the available information.

A copy of this Engagement Report, prepared in accordance with section 73(7) of the Act, will be published on the PlanSA Portal and be accessible to the public. The Engagement Report includes a summary of the feedback received during engagement and outlines the reasons for choosing to amend the Code Amendment after the engagement process.

#### **(5) Engagement processes are reviewed and improved**

*The engagement was reviewed, and improvements recommended*

The engagement processes have been reviewed to see whether the principles have been met and what can be done to improve the process next time. The Engagement Plan was adhered to, and no unforeseen changes occurred.

The evaluation of the engagement process confirmed that the community was engaged and was able to access the information related to the Code Amendment. In total 20 responses were received, 2 people attended the in-person community information sessions and 5 people participated in the on-line community information sessions.

The submission showed that people were provided with sufficient information to make an informed view, their views were being heard and that their input would be considered when preparing the Code amendment for approval.

The timing of the engagement process was appropriate and provided the opportunity for the community to access and consider the information provided, and for the feedback received to be considered when determining whether changes to the Code Amendment were required.

The engagement process showed that the use of Eventbrite to facilitate the on-line community information sessions should be reviewed. Eventbrite is an international organisation that promotes events throughout the world. As a result, four of the five people who registered to attend these events were from countries outside of Australia and apart from a general interest in flood hazard mapping they were not directly affected by the Code Amendment and the questions asked by them, were generally unrelated to the changes being proposed. This did not affect the engagement of this Code Amendment, due to the small number of participants in each session. This, however, is likely to be an issue for future Code Amendments that attract a larger number of participants to online information sessions.

## 6 Engagement Outcomes

20 submissions were received in response to the Code Amendment including 5 from members of the public and members of key industries, 11 from Councils and 4 from Government agencies and Members of Parliament.

Nearly all of the submissions received during community engagement were in support of the changes being proposed in this Code Amendment or sought to clarify information related to the Code Amendment. Some of the feedback received during community engagement focused on matters that are beyond the scope of this Code Amendment, including the changes being considered in the future State-wide Code Amendment and the progress of the future State-wide Flood Hazard Code Amendment. Of the 20 submissions received 17 (85%) supported or did not object to the Code Amendment outcomes and 3 (15%) raised concerns with either the Code Amendment Outcomes or the broader flood hazard policies that currently appear in the Code.

The submissions included feedback in relation to the data being used to reduce the extent of the Hazard (Flooding – Evidence Required) Overlay. This feedback related primarily to the age of the flood studies and concerns about the use of Regional coarse mapping to remove the Hazard (Flooding – Evidence Required) Overlay. It was suggested that due to the scale and accuracy of Regional coarse mapping, it should not be used to reduce the extent of the Hazard (Flooding – Evidence Required) Overlay in built-up urban areas within Metropolitan Adelaide, and that the overlay should remain until more detailed flood data was available.

After considering this issue, the draft Code Amendment was updated to retain the Hazard (Flooding – Evidence Required) Overlay within metropolitan Adelaide, where it is located within a residential, activity or neighbourhood zone (the overlay will be snapped to zone boundaries) and there is no local knowledge or detailed flood study supporting the removal of the overlay in a specific area.

A summary of key issues raised and PLUS response to these issues is outlined below.

### 6.1 The use of precautionary overlays to remove the DTS pathway

The submissions included support for the reduced Hazard (Flooding – Evidence Required) Overlay because it better reflects the hazard risk and helps to simplify the assessment process. This will help to achieve more affordable development, less delays and greater flexibility when designing houses and choosing materials.

One submission expressed frustration that the precautionary Hazard (Flooding – Evidence Required) Overlay was originally introduced, claiming little evidence to support its implementation or its relationship to quality development. It further stated that the overlay resulted in an immediate barrier to the DTS pathway for Development Applications.

The submission suggested that the community should be considered in conjunction with economic implications when altering flood mapping given pressures on the industry due to trade and material shortages. The planning system relies on speed of delivery and quality outcomes and therefore, appropriate solutions, for the Code, should be based on an agreed position between industry and the government.

#### **Response:**

The Hazard (Flooding – Evidence Required) Overlay is applied as a precautionary measure in areas where the flood hazard is unknown. It excludes availability of the DTS pathway to development classes that are vulnerable to flood hazard. The Code Amendment is proposing to remove this overlay where recent flood studies have determined that there is minimal risk of flooding and making available the DTS pathway in certain areas.

## 6.2 The use of future conditions, including Climate Change to 2050.

Some of the submissions highlighted the need for the data used to inform hazard policies and mapping to consider the future impacts of climate change to 2050. The submission from the Premier's Climate Change Council (PCCC) highlighted that projections for South Australia include more frequent and intense extreme weather events, resulting in more natural disasters.

The submission from PCCC advises that a 2021 report by Deloitte Access Economics estimates that, under a low emissions scenario, the total economic cost of natural disasters across Australia will reach \$63 billion per year by 2050. The PCCC supported updating flood hazard mapping assessments to help build the resilience of the state from the impacts of climate change and ensuring the correct hazard overlay policies are applied to the right areas.

### Response:

Future projections to 2050 were incorporated into the new and enhanced flood studies which were procured in Stage 2 of the Project. These projections are being considered in the preparation of the flood hazard policies and overlays for the proposed State-wide Code Amendment to follow this Code Amendment.

## 6.3 The use of 30m regional coarse mapping to determine the extent of the Hazard (Flooding – Evidence Required) Overlay in regional and outback areas.

A small number of submissions raised concerns about the accuracy, validity and applicability of the 30m Mapping used to define the location of flood hazard in outback townships and ultimately the extent of the Hazard (Flooding – Evidence Required) Overlay. This included examples where the Hazard (Flooding – Evidence Required) Overlay was proposed to be removed from low lying areas which are functioning as drainage reserves and thus having a physical topography lower than surrounding areas.

The submission recognized that this was a desert climate zone with negligible annual rainfall and therefore supported the proposed changes and acknowledged that overall, there would be a large net gain, given that far fewer properties would be affected by redundant flood hazard mapping.

Notwithstanding this, it was suggested that the extent of the proposed flood mapping be adjusted based on local knowledge because, although there are no defined watercourses, rainfall events can be intense when they do occur.

### Response:

The Code Amendment seeks to introduce a consistent methodology to determine the extent of flood hazard in outback areas which includes the use of 30m course regional data. The 30m course regional data identifies low lying areas that have a physical topography lower than surrounding areas and the Hazard (Flooding – Evidence Required) Overlay has been retained in areas where the mapping has identified a topography that has a depth greater than 1 metre when compared to the surrounding area or that intersects with a watercourse. While mapping of this scale may not be as accurate as a detailed flood study, this is the best available mapping at this time and there is unlikely to be any studies undertaken in these areas given the cost of procuring a detailed flood study covering all of Outback SA would be too prohibitive given scale and remoteness. The use of the Course Regional mapping is therefore considered appropriate and given the size of the area, it will allow for the removal of flood policies from large areas that have a minimal risk of flooding.

#### **6.4 The use of 5m and 30m regional coarse mapping to remove the Hazard (Flooding – Evidence Required) Overlay in built-up urban areas within metropolitan Adelaide.**

One submission raised concerns about the use of 5m and 30m regional coarse mapping to remove the Hazard (Flooding – Evidence Required) Overlay from built up / urban areas within metropolitan Adelaide.

The regional coarse mapping has been used to provide an indication of potential flood risk in areas where a detailed flood study has not been undertaken. While this may be the best available mapping, it was suggested that this mapping should not be used to remove the Hazard (Flooding – Evidence Required) Overlay in built up urban areas within metropolitan Adelaide because of concerns about the scale and accuracy of the mapping and the ability to accurately define the potential flood risk.

##### **Response:**

In response to this feedback the Code Amendment for community engagement has been altered to retain the Hazard (Flooding – Evidence Required) Overlay within metropolitan Adelaide, where it is located within a built-up urban area or within a neighbourhood or activity type zone (the overlay will be snapped to zone boundaries) and there is no detailed flood study or mapping for the area.

#### **6.5 Amending Hazard (Flooding – Evidence Required) Overlay in areas where new data or mapping will be available in the next stages of the Project.**

Feedback from the submissions raised concern regarding the potential risk of removing the Hazard (Flooding – Evidence Required) Overlay, from allotments, in this Code Amendment only to reapply new flood hazard mapping in the future State-wide Code Amendment. Options put forward for consideration in the feedback included the following:

- a) the Hazard (Flooding – Evidence Required) Overlay be retained where new flood data will be available, for that area, in the next stage of the Project
- b) rather than retaining the Hazard (Flooding – Evidence Required) Overlay, the appropriate final flood overlay be applied in areas where no new data is forthcoming in the final stages of the Project
- c) generalised flood mapping and data not be used to reduce the application of the Hazard (Flooding – Evidence Required) Overlay where new flood studies are expected
- d) older flood studies not be used to reduce the Hazard (Flooding – Evidence Required) Overlay because the information is dated and does not consider future conditions and climate change scenarios.

Feedback also recommended that the spatial application of the flood hazard overlays in the Code be updated by this Code Amendment if the information is available now and unlikely to change as part of the future State-wide Code Amendment. This includes parts of Mitcham, Salisbury, Playford, Port Lincoln and Naracoorte, where there are no new flood studies that could affect mapping.

The use of generalised or watercourse data for Outback areas, Coober Pedy, Mount Gambier, and Roxby Downs was supported where there will be no new data forthcoming in the final stages of the Project. Even though the Ambient and watercourse information (buffered) doesn't align well due to different resolutions.

Feedback further suggested that coarse regional mapping does not accurately reflect the potential flood hazard risk in some locations such as coastal areas that have experienced a large amount of urban development and recommended that the Overlay not be removed in these locations until detailed floodplain mapping has been completed.

Feedback also suggested that where the available mapping for one Council area identified a flood hazard in another Council area, the Hazard (Flooding – Evidence Required) Overlay should be expanded to include these areas.

It was also suggested that where rivers include ancillary swamp/wetlands areas and creeks, that have been buffered using distance rather than elevation (which identified low lying land) the buffering using distance rather than elevation (which identifies low lying land) is insufficient approach and will not identify the risk and therefore, the Hazard (Flooding – Evidence Required) Overlay should remain in these locations.

Where generalised flood products are used, feedback suggested that it should be made clear what product was used to underpin the decision and the rationale for using the particular product e.g., JBA versus Ambient, riverine versus pluvial.

If additional overlays that extend beyond the 1 % AEP are to be implemented in the proposed State-wide Code Amendment, it was suggested that this should be clearly communicated to all affected council areas.

**Response:**

The Code Amendment is limited to 12 local government areas and several townships within outback areas. The Hazard (Flooding - Evidence Required) Overlay is only being reduced within these areas where it can be shown that there is a minimal risk of flooding. While the Hazard (Flooding - Evidence Required) Overlay is being retained in all other areas, further consideration will be given to the extent of this overlay as part of the proposed State-wide Code Amendment.

The mapping for the proposed State-wide Code Amendment has not yet been completed and, as such, it is not possible to completely avoid the possibility that an area may be removed from the Hazard (Flooding – Evidence Required) Overlay by this Code Amendment and have flood mapping applied by the State-wide Code Amendment. This, however, is not expected to occur often or affect to large areas.

The scope of this Code Amendment was amended to focus solely on the extent of the Hazard (Flooding - Evidence Required) Overlay within the affected areas. For this reason, the scope of the Code Amendment no longer allows for the extent of other flood overlays to be changed, even if the new and enhanced flood studies have already identified a change in flood risk and the flood risk is unlikely to change before the implementation of the proposed State-wide Code Amendment.

The proposed State-wide Code Amendment will provide the opportunity to update all flood hazard overlays and policies in the Code based on the new and enhanced flood studies and mapping, which includes more recent data and new modelling that considers climate change scenarios to 2050. While in some cases the recent flood studies have been used to retain parts of the Hazard (Flooding - Evidence Required) Overlay, it cannot be used in all cases because the new flood mapping for the second Code Amendment is not complete.

In addition to this, the overlay and policy structure in the Code is being reviewed as part of the State-wide Code Amendment and therefore it is too early to predict whether new Overlays or layers will be identified as part of the proposed State-wide Code Amendment.

## 6.6 Minimum finished floor levels where the flood overlays do not apply

Some submissions raised issue with the Code not containing policy seeking that development achieve a finished floor level (FFL) 300mm above top of kerb (TOK) or highest point of natural ground level (NGL) in areas not covered by a flood hazard overlay.

These submissions observed that areas not identified as being vulnerable to flooding by a flood study may still flood due to issues with stormwater management infrastructure. They consequently argue for a requirement regarding minimum FFLs to apply universally.

It was argued that the Code should include a new general policy seeking a minimum FFL that is 300mm above TOK or NGL outside flood hazard overlays.

**Response:**

The Code does not include a general policy for buildings in areas not covered by a flood hazard overlay to have a FFL at least 300mm above the highest point TOK of the primary street or the highest point of NGL at the primary street boundary where there is no kerb.

The scope of this Code Amendment does not allow for changes to Code policy, however the proposed State-wide Code Amendment will have scope to consider policy changes of this nature. This will include consideration as to whether a general policy requiring a FFL of at least 300mm above the highest point of top of kerb of the primary street or the highest point of natural ground level at the primary street boundary is warranted.

## 6.7 Identify flood levels for each allotment in SAPPA flood overlays.

One of the submissions expressed frustration with needing to engage engineering expertise to determine flood levels when developing in flood prone areas. It was suggested that the proposed mapping should include this information, in the same way that Queensland does.

**Response:**

This is not being considered as part of this Code Amendment, however, the possibility of including this information in the proposed mapping will be investigated as part of the State-wide Code Amendment.

## 6.8 Process for updating flood hazard mapping in the Code more regularly.

One of the submissions stated that the SA Property and Planning Atlas (SAPPA) website is not keeping pace with new residential land divisions, meaning some newly created allotments remain in a flood hazard overlay, despite there being minimal risk of flooding. This in turn results in unnecessary insurance premiums.,

Support for a flexible and efficient mechanism that would allow for the efficient updating of flood hazard overlays, based on new flood studies that meet a specific criterion, when on-the-ground situations change.

**Response:**

The future State-wide Code Amendment will seek to introduce a mechanism in the Code that will allow the Minister to alter the spatial extent of flood hazard overlays in the Code in an expedited manner to respond to updates to flood hazard mapping that meet specified criteria amongst other things.

## 6.9 Stage 2 & 3 of the Flood Hazard Mapping and Assessment Project

Some submissions were unrelated to this Code Amendment or sought more information / clarification regarding Stage 2 and 3 of the Project and the future State-wide Flooding Hazards Code Amendment, which is being undertaken by the State Planning Commission in Stage 2 and 3 of the Project. This included:

- an update on the progress of the State-wide Flooding Hazards Code Amendment
- a request for councils and key industries to be more involved in the State-wide Flooding Hazards Code Amendment process and the outcomes being sought
- a request for councils to be given access to the new flood studies, including data and mapping, which are being prepared in stage 2 of the Project

- questions as to why particular councils were not being affected by the State-wide Flooding Hazards Code Amendment.

**Response:**

This Code Amendment applies to council areas which had flood hazard mapping that was not previously available when the Code was fully implemented in March 2021, resulting in the Hazards (Flooding - Evidence Required) Overlay being applied to the council area.

The proposed State-wide Flooding Hazards Code Amendment will seek to update flood hazard policies and mapping to address the impact of flood hazard more broadly throughout the State.

The proposed State-wide Flooding Hazards Code Amendment is being led by the State Planning Commission and at the time of this report being prepared is yet to be initiated.

If the proposed State-wide Flooding Hazards Code Amendment is initiated by the Commission, councils and other key stakeholders will be engaged on a preliminary basis during the preparation of a draft proposal before broader community engagement is commenced.

The new and enhanced flood studies and mapping procured in Stage 2 of the Project have been completed and this information can now be accessed by councils in accordance with data sharing agreements.

A copy of the submissions received during community engagement is contained in **Attachment 3** to this Engagement Report.

## 7 Recommended changes

After reviewing all the submissions from the community engagement process, consideration was given to the use of regional coarse mapping to remove the Hazard (Flooding - Evidence Required) Overlay in built-up urban within Metropolitan Adelaide.

The draft Code Amendment was amended post community engagement to retain the Overlay in built up urban areas in a neighbourhood or activity type zone (the overlay is snapped to zone boundaries) in metropolitan Adelaide and where there is no local knowledge or detailed flood study supporting the removal of the overlay.

## Attachments

## Attachment 1 - Evaluation Results

### Results and Evaluation of Designated Entity's engagement

The engagement was evaluated by the PLUS Communication and Engagement team.

	<b>Evaluation statement</b>	<b>Response options (Select answer)</b>
1	Engagement <b>occurred early enough</b> for feedback to genuinely influence the planning policy, strategy or scheme <b>(Principle 1)</b>	<p><i>Early engagement occurred with all participating local councils and with the Flood Hazard Mapping and Assessment Project Management Committee prior to the first draft of the Code Amendment being released for community engagement.</i></p> <p><i>The engagement period ran for 8 weeks allowing time for feedback to be captured and for it to be genuinely considered prior to the draft Code Amendment being finalised.</i></p>
2	Engagement <b>contributed to the substance</b> of the Code Amendment <b>(Principle 2)</b>	<p><i>There were no significant objections to the proposed Code Amendment and the engagement did not substantially contribute to this Code Amendment.</i></p> <p><i>The feedback, however, included concerns about the use of regional coarse mapping to remove the Hazard (Flooding - Evidence Required) Overlay in built-up urban within Metropolitan Adelaide. The draft Code Amendment was amended post consultation to retain the Hazard (Flooding - Evidence Required) Overlay in residential, activity or neighbourhood zones (the overlay will be snapped to zone boundaries) where they are located within metropolitan Adelaide and there is no local knowledge or detailed flood study supporting the removal of the overlay.</i></p> <p><i>Some of the feedback received relates to matters that will be considered when undertaking investigations for the State-wide Flooding Hazards Code Amendment, including changes to Code policies and the other flood hazard overlays.</i></p>
3	The <b>engagement reached</b> those identified as the community of interest <b>(Principle 3)</b>	<p><i>Due to the promotion across the PlanSA channels, the advertising in local newspapers, the online &amp; social media posts, and – in particular – the collaboration with the participating councils who helped share information about this Code Amendment with their respective communities, the community engagement undertaken was able to reach the targeted audience. The low participation in the engagement reflects the narrow and technical scope of this Code Amendment.</i></p>

<p><b>4</b></p>	<p>Engagement included the <b>provision of feedback to community about outcomes</b> of their participation (<b>Principle 4</b>)</p>	<p><i>This engagement report, along with the finalised Code Amendment (if approved), will be publicly available and therefore accessible to all those who participated in the engagement process.</i></p> <p><i>Those who participated in the engagement process will be directly advised of the Code Amendment outcomes and how to access the final documents, including the final Code Amendment and the Engagement Report.</i></p>
<p><b>5</b></p>	<p><b>Engagement was reviewed</b> throughout the process and improvements put in place, or recommended for future engagement (<b>Principle 5</b>)</p>	<p><i>This engagement process has been reviewed and recommendations have been noted for future engagement.</i></p>

## Attachment 2 – Copy of Submissions Received

1. Anna from the office of Erin Thomson MP Member for Davenport
2. Abi Coad – Senior Policy Planner at the City of Adelaide
3. Ebrahim Ibrahim – Asset Planner Stormwater & Footpaths - Strategic Asset Management at the City of Adelaide
4. Steve Staines – Coober Pedy Council
5. Nicole Johnston
6. Gary Jutzen - Lower Eyre Council
7. Graeme Crook - Stakeholder group - Regional Development Australia Barossa Gawler Light Adelaide Plains
8. Clyde Shipard and his wife
9. Stuart Payne – Roxby Downs Council – Planning Consultant
10. Steve Hooper - Manager Development Services – City of Port Adelaide Enfield
11. Glen Searle – Policy Planner – West Torrens Council
12. Dr Heather Holmes-Ross – Mayor – City of Mitcham
13. Jamie Hanlon – Urban Policy Planner & Samantha Grieve - Senior Manager City and Corporate Planning – City of Playford
14. Chris Wiltshire - Assistant Director – Planning, Building and Environment- Housing Industry Australia
15. Moira Were AM – Mayor & Mathew Lawrence – Manager of Development Services – Stormwater Management Authority - City of Onkaparinga
16. Patrick Mitchell - Principle Planner – Walker Corporation
17. Georgina Burgess – Planner - Waikato Regional Council in New Zealand - & Tim Hodges – Architect

## Anna - Unable to open Code Amendment Map Viewer

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Anna called from Office of Erin Thomson - Member for Davenport about a code amendment email for Flood Hazard Mapping.

They are unable open the link on any of their work computers or phones and request for information to be sent on email to specify if their area is impacted.

- Tested on my end and I could open
- Email : [REDACTED]

## Abi Coad (City of Adelaide) - How can we be a part of the Flood Hazard Mapping and Assessment Project

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Hello,

I am wanting to find out more about Stage 2 and Stage 3 of this project, in particular how the City of Adelaide can be involved. Can you please let me know who I need to contact to discuss this further.

Kind regards  
Abi

**Abi Coad**

**Senior Policy Planner**

**City Planning and Heritage**

**Kaurna Country**  
Colonel Light Centre

[REDACTED]  
P | [REDACTED]  
E | [REDACTED]



## Steve Staines - call to discuss the flood hazards mapping code amendment.

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11:28 AM 23/02/2023

Steve Staines - Coober Pedy

[REDACTED]

[REDACTED]

customer is enquiring about the flood hazards mapping code amendment  
they have read through the documentation on the portal but would like to discuss on the phone  
exactly how their council will be impacted  
advised customer I did not have a direct line for the code amendment team but can pass on their  
details and request a call back

## Nicole Johnston – Member of the Public

**From:** PlanSA Submissions <[noreply@plan.sa.gov.au](mailto:noreply@plan.sa.gov.au)>

**Sent:** Tuesday, 21 March 2023 10:16 PM

**To:** DTI:Plan SA <[plansa@sa.gov.au](mailto:plansa@sa.gov.au)>

**Subject:** Public Consultation submission for Flooding Hazards Mapping Update Code Amendment

PlanSA,

<b>Submission Details</b>	
Amendment:	Flooding Hazards Mapping Update Code Amendment
Customer type:	Member of the public
Given name:	Nicole
Family name:	Johnston
Organisation:	0, is brand new business
Email address:	[REDACTED]
Phone number:	[REDACTED]
My overall view is:	I support the Code Amendment
Comments:	<p>Existing flood maps are available for the Naracoorte region, there are also significant historical documents that address drainage in the southeast dating back 100 years.</p> <p>Please include the settlement of "flood" waters that naturally occurred and then sank into local underground water supplies that have been so badly diverted that Bordertown now has reports of little to no water left for the town to draw on.</p> <p>Yes expansion, but if the flood Plains are re delegated then more than just homeowners property will be at risk.</p>

## Gary Jutzen - flooding hazards code amendment enquiry

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PlanSA,

Submission Details	
Amendment:	Flooding Hazards Mapping Update Code Amendment
Customer type:	Council
Given name:	Gary
Family name:	Jutzen
Organisation:	Lower Eyre Council
Email address:	[REDACTED]
Phone number:	[REDACTED]
My overall view is:	I am impartial about the Code Amendment
Comments:	<p>Hi there,</p> <p>I am curious to know why some Council's have been omitted.</p> <p>The town of Cummins has had parts inundated at least twice in its history from the flood waters from the Peelina Creek, the most recent being January 2022.</p> <p>What is the criteria for determining what areas get covered? Cheers and thanks GJ</p>



## Graeme Crook - Stakeholder group - Regional Development Australia Barossa Gawler Light Adelaide Plains

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Attended the Playford Council Community information session as a representative of primary producers in the region.

Was not concerned with particular parts of the Code Amendment and his region of interest is not being affected by the Code Amendment.

Raised a general concern about the imposition and costs for businesses having to build to accommodate a 1:100 year flood, that rarely occurs.

Was interested in the new flood studies being prepared in stage 2 of the project and whether the new residential developments, such as River Lea, will have a significant impact on the flood plain.

## Clyde Shipard and his wife Cowell SA

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Spoke about the Flooding Hazards Mapping Update Code Amendment.

Advised that they have completed an online property search for their property as well as the surrounding properties and it has only identified a few properties in the area as having a 'Flood Management Overlay' (Evidence Required Overlay).

Advised that he called us after being concerned that the website showed his property is affected by a flood management layer, but his neighbour's is not.

After discovering this they searched the internet and found out about the code amendment and gave us a call because they are concerned and wanted to speak with someone to understand more about this amendment and how it may affect them.

He is also concerned that Council has recently approved a number of large sheds on adjacent properties and these developments have resulted in stormwater ending up on his property during rain events.

## Stewart Payne - comment on Flooding Hazards Mapping Update Code Amendment

PlanSA,

Submission Details	
Amendment:	Flooding Hazards Mapping Update Code Amendment
Customer type:	Council
Given name:	Stewart
Family name:	Payne
Organisation:	Roxby Downs Council
Email address:	[REDACTED]
Phone number:	[REDACTED]
My overall view is:	I support the Code Amendment
Comments:	<p>Roxby Downs Council supports the Code Amendment. Council considers that there is overall benefit with the CA as the number of properties in the Council area which will be affected by flooding policies is very much reduced over the current generic Flooding (Evidence Required) Overlay. Prior to the formal consultation process, Council received information about the intended Code Amendment and was given an opportunity to comment. We did provide comment at that time about the inaccuracy of mapping being relied upon to define new flood hazard overlays. A couple of cases in point were identified; Stuart Road and Formosa Road Hakea Street areas (see attachments). In both cases, low lying areas which are functioning as drainage reserves and thus having a physical topography lower than surrounding areas, were not included in the proposed new hazard zone. Instead, adjacent areas were identified as low lying and consequently having some flooding risk. As the new flooding overlay is relying upon what appears to be incorrect base data from coarse grain mapping, the validity and applicability of policy called up by the overlay is obviously questionable. When this was pointed out to PLUS staff we were advised that while the mapping may be inaccurate, there was a large net gain given that far fewer properties would be affected by redundant flood hazard mapping. We were advised that it would be possible to more closely define flood hazard areas in the process of the preparation of a subsequent Code Amendment. It should be noted overall, that Roxby Downs is in a desert climate zone with negligible annual rainfall. There are no defined watercourses. Rainfall events can be intense when it does occur. Local knowledge would be valuable in properly defining flood hazards in any subsequent policy exercise as flagged by PLUS staff.</p>

## Attachment 1

Ceratonia Street catchment which has not been picked up in flood hazard mapping. Local knowledge suggests that this area has flooding potential. Potential impact on housing is not known.





## Steve Hooper - Manager Development Services – City of Port Adelaide Enfield

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13 April 2023

Code Amendment Team  
Planning and Land Use Services  
Department for Trade and Investment  
GPO Box 1815  
ADELAIDE SA 5001

Sent via email [plansasubmissions@sa.gov.au](mailto:plansasubmissions@sa.gov.au)

Dear Planning and Land Use Services

**Re: Flooding Hazards Mapping Update Code Amendment - submission**

I refer to the abovenamed Code Amendment that has been released for consultation. At its April 2023 meeting, the City of Port Adelaide Enfield considered the amendment, and resolved to support the mapping changes proposed for the Council area. As a result, the proposed boundary of the *Hazards (Flooding – Evidence Required) Overlay* is supported, with no additional adjustments sought by Council.

I also take this opportunity to acknowledge the constructive approach of officers from Planning and Land Use Services, in liaising with Council staff during the amendment's preparation.

More broadly, Council looks forward to participating in the additional flooding-related Code Amendments that have been foreshadowed by the department for later this year.

Thank you for the invitation to make a submission. If you require further information or would like to discuss this matter, please contact Michael Kobas, Urban Planner on 8405 6002.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'S Hooper', written over a light blue horizontal line.

Steve Hooper  
Manager Development Services



## Glen Searle – Policy Planner – West Torrens Council

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**From:** Glenn Searle [REDACTED]  
**Sent:** Friday, 21 April 2023 10:53 AM  
**To:** DTI:PlanSA Submissions <[plansasubmissions@sa.gov.au](mailto:plansasubmissions@sa.gov.au)>  
**Subject:** Flooding Hazards Mapping Update Code Amendment - West Torrens Council Submission

To Whom it May Concern,

Please find attached a copy of the City of West Torrens submission on the Flooding Hazards Mapping Update Code Amendment, also attached is a cover letter from the CEO and the minutes from the Council meeting which endorse the submission.

If you have any trouble with these attachments please contact me.

Regards,

Glenn Searle  
Policy Planner  
City Of West Torrens  
[REDACTED]

Phone: [REDACTED]  
Email: [REDACTED]



[Click here to visit westtorrens.sa.gov.au](https://www.westtorrens.sa.gov.au)

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## Attachment 1



20 April 2023

Code Amendment Team  
Planning and Land Use Services  
Department for Trade and Investment  
GPO Box 1815  
**ADELAIDE SA 5001**

Via email: [plansasubmissions@sa.gov.au](mailto:plansasubmissions@sa.gov.au)

To whom it may concern,

### **Flooding Hazards Mapping Update Code Amendment**

Please find Council's submission on the proposed Flooding Hazards Mapping Update Code Amendment.

Council considered this matter at its 18 April 2023 meeting. A number of recommendations were discussed resulting in Council resolving to submit the attached feedback as Council's formal submission to the proposed Code Amendment.

Also attached for reference, is a copy of the Administration's report to Council.

If you would like to discuss this matter further please contact Gordon Andersen, Manager Strategy and Business (Acting) on [REDACTED] or via email [REDACTED]

Yours sincerely

A handwritten signature in black ink that reads 'Terry Buss'.

**Terry Buss PSM**  
**Chief Executive Officer**  
**City West Torrens**

*Attachments:*

- *City of West Torrens submission on the Flooding Hazards Mapping Update Code Amendment*
- *Council report regarding the Flooding Hazards Mapping Update Code Amendment from 18 April 2023*

## Attachment 2

### 16.2 Flood Hazards Mapping Update Code Amendment

#### Brief

This report presents feedback on the proposed Flood Hazards Mapping Update Code Amendment which seeks to alter the spatial application of existing policy contained within the Planning and Design Code (the Code).

#### RECOMMENDATION

It is recommended to Council that feedback contained in the body of this report be submitted to PlanSA as its formal response to the *Flood Hazards Mapping Update Code Amendment*.

#### Introduction

The proposed Flood Hazards Mapping Update Code Amendment (Code Amendment) (**Attachment 1 under separate cover**) is currently the subject of public consultation by the State Government. Consultation began on 22 February and closes at 5.00pm on 21 April 2023. The designated entity is the Chief Executive of the Department for Trade and Investment, with PlanSA the nominated contact.

This Code Amendment proposes to:

- **Reduce** the extent of Hazards (Flooding - Evidence Required) Overlay in 12 local government areas and several Outback Areas where more recent flood hazard mapping has demonstrated there is minimal risk of flooding.
- **Apply** the Hazards (Flooding - Evidence Required) Overlay to a portion of the Port Adelaide Enfield Council area, as a precaution, where the level of flood hazard has not yet been determined and until new flood hazard mapping can be implemented in future stages of this project.

The local government areas where the Hazards (Flooding - Evidence Required) Overlay are proposed to be reduced are as follows:

- Burnside, Coober Pedy, Clare and Gilbert Valleys, Mitcham, Marion, Mount Gambier, Naracoorte Lucindale, Onkaparinga, Playford, Port Adelaide Enfield, Port Lincoln, Roxby Downs, and Salisbury.

The Hazards (Flooding – Evidence Required) Overlay will also be reduced in some outback areas. The proposed Code Amendment does not at this stage present a change to the spatial application of overlays to West Torrens.

#### Discussion

The Code Amendment seeks to update the extent of the Hazard (Flooding – Evidence Required) Overlay in the Planning and Design Code (as identified above), based on more recent flood hazard mapping.

This Code Amendment is the first step in a three-stage Flood Hazard Mapping and Assessment Project which is being undertaken to deliver more consistent and contemporary mapping of riverine and flash flood hazards across South Australia. Stage 2 involves the procurement of new flood studies which will inform new mapping for the entire State. Stage 3 will seek to incorporate the new mapping into the Code via a second State-wide Flooding Hazards Code Amendment, expected to go to consultation later in 2023.

The Flooding Hazards Mapping Update Code Amendment is focused exclusively on the Hazards (Flooding – Evidence Required) Overlay in the Code.



The *Guide to the Planning and Design Code (Attachment 3 under separate cover)* identifies the outcome, where it applies, and referrals for the following Hazards (Flooding - Evidence Required) Overlays as follows:

- **Hazards (Flooding – Evidence Required) Overlay**

*Overlay outcome*

The Hazards (Flooding - Evidence Required) Overlay seeks to minimise the potential impacts on people, property, infrastructure and the environment from potential flood risk by adopting a precautionary approach to mitigate potential impacts of potential flood risk through appropriate siting and design of development.

*Where it applies*

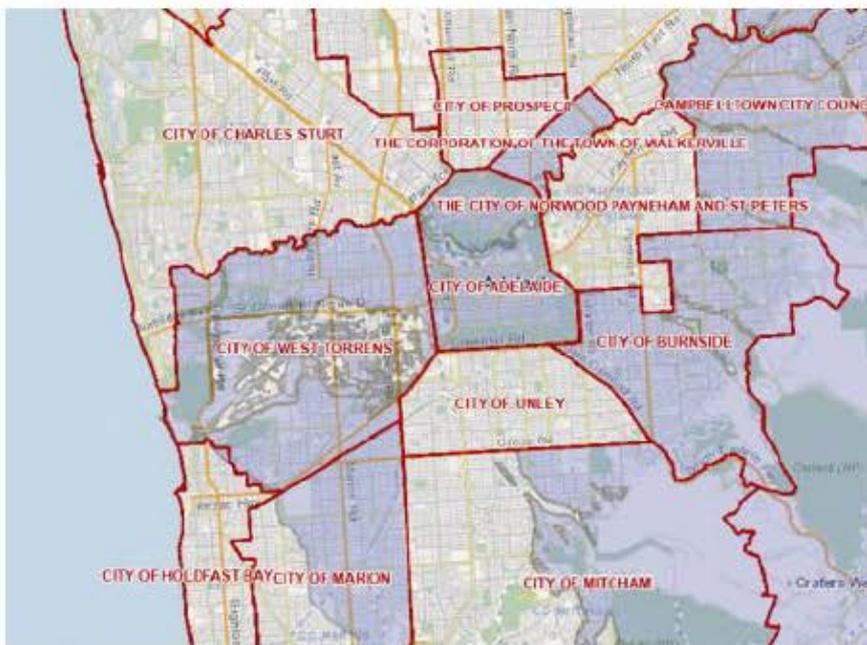
The Hazards (Flooding - Evidence Required) Overlay applies to areas where flood mapping is not available and therefore the potential risk of flood is unknown.

*Referrals*

None.

The application of the flood related overlays as applied in West Torrens provides planning policy for assessment of a development application in the context of flood. Specifically, the Hazards (Flooding - Evidence Required) Overlay (**Image 2**), which is subject of this Code Amendment, has a Desired Outcome that seeks:

*"...that development adopts a precautionary approach to mitigate potential impacts on people, property, infrastructure and the environment from potential flood risk through the appropriate siting and design of development."*



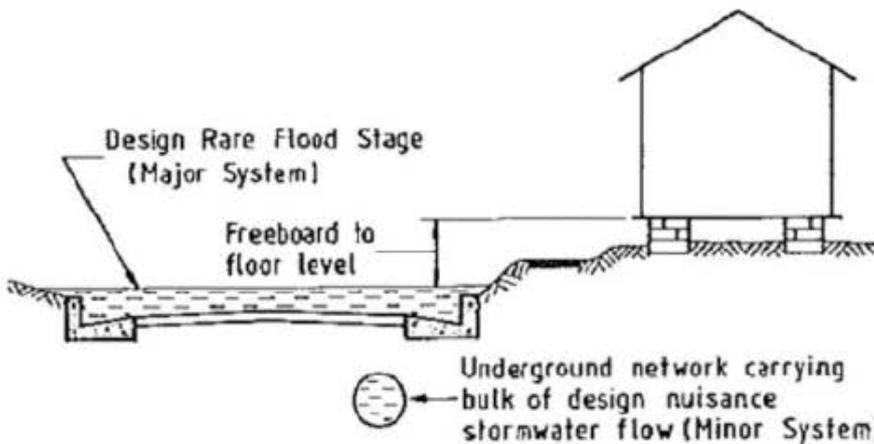
**Image 2:** Application of Hazards (Flooding - Evidence Required) Overlays

The application of the Hazards (Flooding- Evidence Required) Overlay within West Torrens is somewhat unique when compared to the majority of other council areas as shown in **Image 2**. This is because of the widespread application of this overlay in comparison to other council areas. The overlay applies the following assessment provisions to assess flood resilience in a development application:

<p><b>PO 1.1</b></p> <p>Development is sited, designed and constructed to minimise the risk of entry of potential floodwaters where the entry of floodwaters is likely to result in undue damage to or compromise ongoing activities within buildings.</p>	<p><b>DTS/DPF 1.1</b></p> <p>Habitable buildings, commercial and industrial buildings, and buildings used for animal keeping incorporate a finished floor level at least 300mm above:</p> <p>The highest point of top of kerb of the primary street or the highest point of natural ground level at the primary street boundary where there is no kerb.</p>
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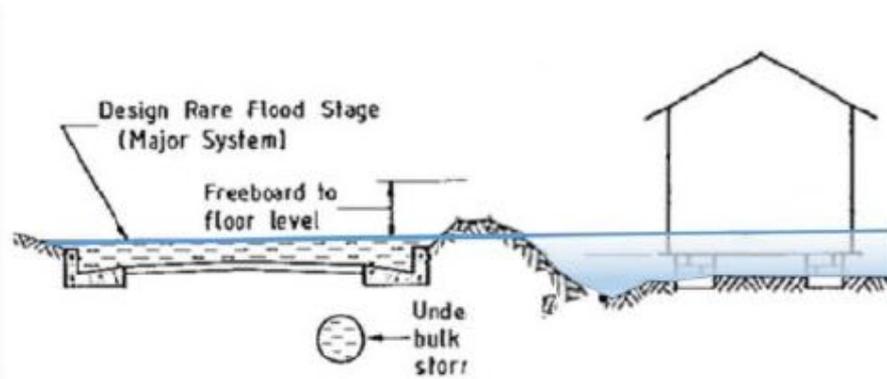
Without the use of the Hazards (Flooding - Evidence Required) Overlay, the above policy is not accessible for use in an assessment. As such, the Administration does not want to lose the ability to call on this policy.

Common practice is to provide underground pipes for the Minor 1 in 5 year storm (20% chance it will occur in any given year), while the Major 1 in 100 year storm (1% chance it will occur in any given year) is too large to be contained within the pipes and is designed to travel overland in the road reserve (as shown in **Image 3**). This occurs in all urban areas irrespective of riverine capacity or pit and pipe capacity. This is an every street concern irrespective of a flood related hazard overlay being applied.



**Image 3:** Identification of Minor System and Major System and building with freeboard to floor level adequate to prevent inundation to the building in the urban landscape

In instances where development sits below the highest point of the top of kerb (TOK) or the highest point of natural ground level (NGL) where there is no kerb, in Major storm events stormwater will inundate the property (see **Image 4**). This can be circumvented by ensuring that the policy in the Hazards (Flooding - Evidence Required) Overlay remains either as an overlay or by providing general development policy in the Code to set a minimum FFL (TOK or NGL).



**Image 4:** Identification of Minor System and Major System and building with freeboard to floor level inadequate to prevent inundation to the building in the urban landscape

Images 5, 6 and 7 (below) are of Marion Road, Plympton which highlights how the road carries water during a major storm.



**Image 5:** Marion Road, Plympton, which is being used to carry water during a major storm event



**Image 6:** Marion Road, Plympton which is being used to carry water during a major storm event



**Image 7:** Marion Road, Plympton, which is being used to carry water during a major storm event

If the spatial application of this overlay was to be reduced, the Administration would be seeking the inclusion of such policies within the general policies contained in the Code.

The Administration suspects that the Hazards (Flooding - Evidence Required) Overlay will be removed or reduced during the course of this project. If the Hazards (Flooding - Evidence Required) Overlay were to be removed or reduced, then the policy contained in this overlay would not be captured elsewhere in the assessment. The policy contained in this overlay enables a precautionary approach to mitigate potential impacts of flood risk through setting appropriate FFL for development. Its removal would not enable the adequate consideration of flood risk in future development unless captured and applied in another way through the Code.

Stage 2 of this project includes the procurement of new flood studies to inform new mapping for the entire State. The Administration recommends that the Department liaises with and seeks advice from councils for all subsequent stages. This is to ensure that the capture of new information is adequate for multidisciplinary use and that the mapping can be used as a tool for future mitigation analysis and master planning of the mitigation works.

#### **Recommendation**

Taking all this into account, it is recommended that:

1. PlanSA engages with councils to seek input principles to the modelling approach and SMA documentation and to also review and provide technical oversight into the project.
2. The spatial application of the Hazards (Flooding - Evidence Required) Overlay be retained as it is currently across West Torrens on the basis that, in the event the application of this overlay were to change, general development policies related to natural resources and environment would need to be replicated to reflect the flood resilience policy contained in the Hazards (Flooding - Evidence Required) Overlay.
3. Future stages of this project anticipate delivery of revised state-wide policy for flood hazards in the Code and to deliver a full suite of new and updated mapping products. Therefore, it is recommended that Council advises PlanSA that it seeks the engagement by PlanSA with councils and appropriate bodies to ensure:
  - a. capture of new information is adequate for multidisciplinary use and that the mapping can be used as a tool for future mitigation analysis and master planning of the mitigation works;

- b. input principles to the modelling approach and SMA documentation is accurate and to also review and provide technical oversight into the project.

#### **Climate Impact Considerations**

*(Assessment of likely positive or negative implications of this decision will assist Council and the West Torrens Community to build resilience and adapt to the challenges created by a changing climate.)*

Appropriate policy implementation has the ability to promote a climate resilient built form.

#### **Conclusion**

This report presents recommended feedback to PlanSA on the proposed *Flood Hazards Mapping Update Code Amendment*.

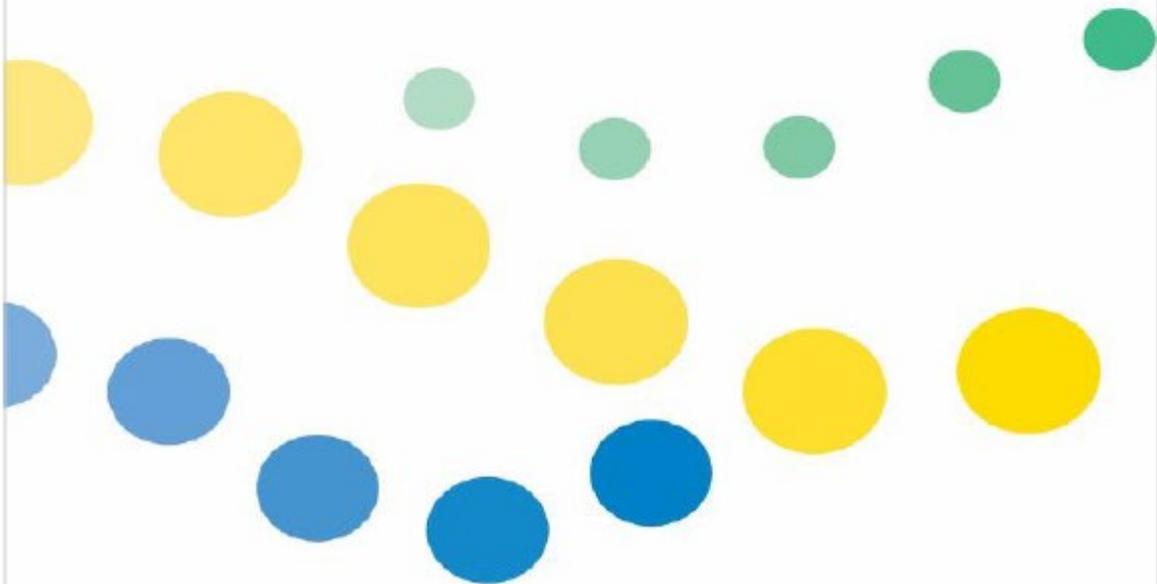
#### **Attachments**

1. Draft Flooding Hazards Mapping Update Code Amendment (under separate cover)
2. Engagement Plan: Flooding Hazards Mapping Update Code Amendment (under separate cover)
3. Guide to the Planning and Design Code (under separate cover)

Attachment 3



**Flood Hazards Mapping Update  
Code Amendment  
West Torrens Council Submission**



The proposed Flood Hazards Mapping Update Code Amendment (Code Amendment) is currently the subject of public consultation. Consultation began on 22 February and closes at 5.00pm on 21 April 2023.

The Code Amendment seeks to update the extent of the Hazard (Flooding – Evidence Required) Overlay in the Planning and Design Code, based on more recent flood hazard mapping.

This Code Amendment is the first step in a three-stage [Flood Hazard Mapping and Assessment Project](#) which is being undertaken to deliver more consistent and contemporary mapping of riverine and flash flood hazards across South Australia. Stage 2 involves the procurement of new flood studies which will inform new mapping for the entire State. Stage 3 will seek to incorporate the new mapping into the Code via a second State-wide Flooding Hazards Code Amendment, expected to go on consultation later in 2023.

This Code Amendment does not seek any change to West Torrens, there is concern that the proposed Code Amendment may lead to the rules of application being altered. If that were to occur, then that could result in changes to the spatial application of Hazards (Flooding - Evidence Required) Overlay to West Torrens at a later date.

The *Guide to the Planning and Design Code* identifies the outcome, where it applies and referrals for the following Hazards (Flooding-Evidence Required) Overlays as follows:

- **Hazards (Flooding – Evidence Required) Overlay**

*Overlay outcome*

The Hazards (Flooding - Evidence Required) Overlay seeks to minimise the potential impacts on people, property, infrastructure and the environment from potential flood risk by adopting a precautionary approach to mitigate potential impacts of potential flood risk through appropriate siting and design of development.

*Where it applies*

The Hazards (Flooding - Evidence Required) Overlay applies to areas where flood mapping is not available and therefore the potential risk of flood is unknown.

*Referrals*

None.

The application of the flood related overlays as applied in West Torrens provides planning policy for assessment of a development application in the context of flood. Specifically, the Hazards (Flooding- Evidence Required) Overlay (image 1) which is subject of this Code Amendment has a Desired Outcome that seeks:

*...that development adopts a precautionary approach to mitigate potential impacts on people, property, infrastructure and the environment from potential flood risk through the appropriate siting and design of development.*

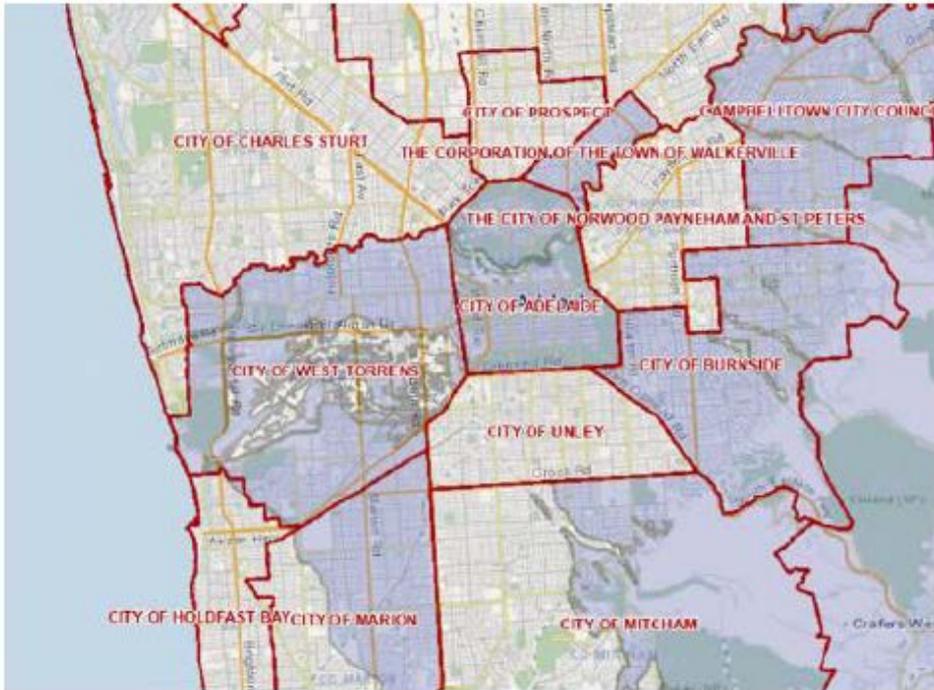


Image One: Application of Hazards (Flooding - Evidence Required) Overlays

The application of the Hazards (Flooding- Evidence Required) Overlay within West Torrens is somewhat unique when compared to the majority of council areas as shown in image one. This is because of the widespread application of this overlay in comparison to other council areas. The overlay applies the following assessment provisions to assess flood resilience in a development application:

<p><b>PO 1.1</b></p> <p>Development is sited, designed and constructed to minimise the risk of entry of potential floodwaters where the entry of flood waters is likely to result in undue damage to or compromise ongoing activities within buildings.</p>	<p><b>DTS/DPF 1.1</b></p> <p>Habitable buildings, commercial and industrial buildings, and buildings used for animal keeping incorporate a finished floor level at least 300mm above:</p> <p>the highest point of top of kerb of the primary street or the highest point of natural ground level at the primary street boundary where there is no kerb</p>
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Without the use of the Hazards (Flooding- Evidence Required) Overlay the above policy is not accessible for use in an assessment. Administration does not want to lose the ability to call on this policy. Common practice is to provide underground pipes for the Minor 1 in 5 year storm (20% chance it will occur in any given year), while the Major 1 in 100 year storm (1% chance it will occur in any given year) is too large to be contained within the pipes and is

designed to travel overland in the road reserve (as shown in image 2 below). This occurs in all urban areas irrespective of riverine capacity or pit and pipe capacity. This is an every street concern irrespective of a flood related hazard overlay being applied.

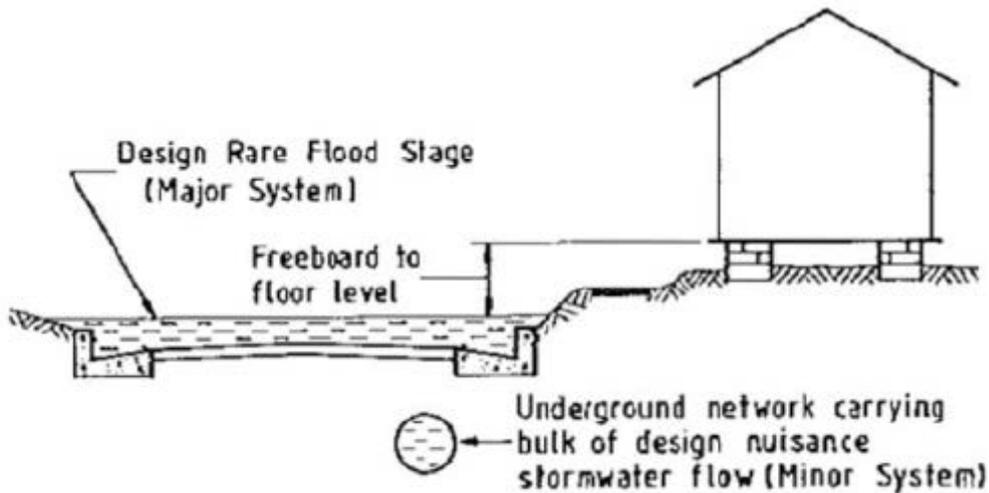


Image Two: Identification of Minor System and Major System and building with freeboard to floor level adequate to prevent inundation to the building

In instances where development sits below the highest point of the top of kerb (TOK) or the highest point of natural ground level (NGL) where there is no kerb in major storm events, stormwater will inundate the property (see image three and images four to six showing real examples of the road carrying water during a major storm). This can be circumvented by providing general development policy in the Code to set a minimum FFL (TOK or NGL)

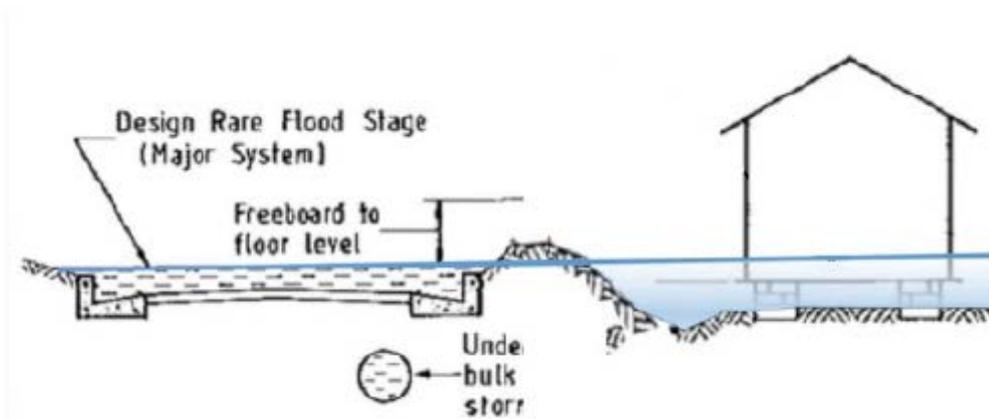


Image Three: Identification of Minor System and Major System and building with freeboard to floor level inadequate to prevent inundation to the building



Image Four: Marion Road, Plympton, which is being used to carry water during a major storm event



Image Five: Marion Road, Plympton, which is being used to carry water during a major storm event



Image Six: Marion Road, Plympton, which is being used to carry water during a major storm event

If the spatial application of this overlay was to be reduced, Council seeks the inclusion of such policies within the general policies contained in the Code.

The Administration suspects that the Hazards (Flooding - Evidence Required) Overlay will be removed or reduced during the course of this project. If the Hazards (Flooding - Evidence Required) Overlay were to be removed or reduced, then the policy contained in this overlay would not be captured elsewhere in the assessment. The policy contained in this overlay enables a precautionary approach to mitigate potential impacts of flood risk through setting appropriate FFL for development. Its removal would not enable the adequate consideration of flood risk in future development unless captured and applied in another way through the Code.

Stage 2 of this project includes the procurement of new flood studies to inform new mapping for the entire State. The Administration recommends that the Department liaises with and seeks advice from councils for all subsequent stages. This is to ensure that the capture of new information is adequate for multidisciplinary use and that the mapping can be used as a tool for future mitigation analysis and master planning of the mitigation works.

**Recommendation:**

Taking all the above into account, it is recommended that:

1. PlanSA engages with councils to seek input principles to the modelling approach and SMA documentation and to also review and provide technical oversight into the project.
2. The spatial application of the Hazards (Flooding - Evidence Required) Overlay be retained as it is currently across West Torrens on the basis that, in the event the application of this overlay were to change, general development policies related to natural resources and environment would need to be replicated to reflect the flood resilience policy contained in the Hazards (Flooding - Evidence Required) Overlay.

3. Future stages of this project anticipate delivery of revised state-wide policy for flood hazards in the Code and to deliver a full suite of new and updated mapping products. Therefore, Council advises PlanSA that it seeks the engagement by PlanSA with councils and appropriate bodies to ensure:
  - a. capture of new information is adequate for multidisciplinary use and that the mapping can be used as a tool for future mitigation analysis and master planning of the mitigation works;
  - b. input principles to the modelling approach and SMA documentation is accurate and to also review and provide technical oversight into the project.

## Dr Heather Holmes-Ross – Mayor – City of Mitcham

---

**From:** Ameer Yardley [REDACTED]  
**Sent:** Thursday, 20 April 2023 3:57 PM  
**To:** DTI:PlanSA Submissions <[plansasubmissions@sa.gov.au](mailto:plansasubmissions@sa.gov.au)>  
**Subject:** City of Mitcham - Flooding Hazards Mapping Update Code Amendment

You don't often get email from [REDACTED]. [Learn why this is important](#)

Dear Mr Holden

On behalf of Mayor Heather Holmes-Ross, please see attached correspondence.

Kind Regards



Ameer Yardley  
Executive Officer to the CEO and Mayor

[REDACTED]  
[REDACTED]  
[REDACTED]  
Please consider the environment before printing this e-mail.

I acknowledge the Aboriginal and Torres Strait Islander people as the Traditional Custodians of country throughout Australia and their connection to land and community. I pay my respect to them and their cultures, and to the Elders past, present and emerging.



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## Attachment 1

OFFICE OF THE MAYOR

19 April 2023

Mr Craig Holden  
 Chair, State Planning Commission  
 C/- Planning and Land Use Services  
 Department for Trade and Investment  
 Via email to [plansasubmissions@sa.gov.au](mailto:plansasubmissions@sa.gov.au)



Dear Mr Holden

**Flooding Hazards Mapping Update Code Amendment**

Thank you for the opportunity to provide feedback on the Flooding Hazards Mapping Update Code Amendment (the Code Amendment).

**Background**

Throughout the transition to the new planning system, Council advocated for updates to flood mapping in the Planning and Design Code (the Code) to ensure that mapping, to the extent that the necessary data and information was available, accurately reflected current risk within the City of Mitcham.

In our submissions on the draft Code (February 2020 and December 2020) Council sought the ability for it, PlanSA and the State Planning Commission to continue to work together to achieve this.

In mid-2021 PlanSA approached Council seeking interest in participating in a state-wide Flood Hazard Assessment Project, which included the current Code Amendment, being the first stage. Based on Council's position on flood mapping in the Code, we accepted the invitation to participate.

Council's planning staff have since been working closely with PlanSA staff to provide mapping and data for inclusion in this Code Amendment that was not included when the Code was initially implemented. PlanSA also has its own new flood data and undertaken further analysis of previously provided data.

To this end, the City of Mitcham supports the state-wide Flood Hazard Mapping and Assessment Project, and the anticipated outcomes of the project, including the delivery of consistent and contemporary mapping of flood hazards across South Australia.

**The Code Amendment**

In relation to the Code Amendment, insofar as it relates to the City of Mitcham, we are pleased to confirm our overall support, in that the Code Amendment:

- Adopts the most up-to-date information Council currently has available
- Utilises information to remove unnecessary processes and policies for development applications where appropriate; and
- Takes a precautionary approach and preserves the Evidence Required Overlay in areas of our city where further work is required to verify the level of flood risk.



The approach to progressive step-change in the Planning and Design Code by way of two separate Code Amendments is also supported.

In this regard, the City of Mitcham is invested in continuing to work with PlanSA as the state-wide Flood Hazard Mapping and Assessment Project continues, including the second Code Amendment, which we understand will be initiated later this year.

### ***Engagement***

Given the significant and complex changes anticipated to result of the next Code Amendment, the City of Mitcham is keen to ensure our local community is informed and provided with appropriate opportunities to participate in the consultation process.

To this end, we reiterate our existing support to PlanSA to promote consultation to our local community and would be happy to discuss what this might entail at the appropriate time.

In addition to standard methods of consultation with the community, and as highlighted in previous communications, the City of Mitcham believes it is important that affected landowners (notably those whose properties may ultimately be located in a higher risk category than is currently the case) are directly notified of the proposed changes and afforded the opportunity to participate more directly in the engagement.

### ***Climate Adaptation and Mitigation***

Considering the increasing instances of extreme weather events resulting from changing weather patterns, the City of Mitcham also strongly supports further efforts by the Government in the areas of climate change adaptation and mitigation, including continued investment in metropolitan stormwater infrastructure (e.g., the Brownhill Keswick Creek Stormwater Project).

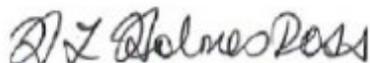
### ***Summary***

While the proposed changes in the Code Amendment will facilitate the use of contemporary and current information for development assessment purposes, the overarching objective must be to minimise future risk of extreme flooding through environmentally focused initiatives.

Again, we thank you for the opportunity to provide feedback on the Code Amendment and look forward to the progress of the state-wide Flood Hazard Mapping and Assessment Project.

Should you have any queries in relation to the above information, please do not hesitate to contact Alex Mackenzie, Manager Development Services on [REDACTED] or at [REDACTED]

Yours faithfully



Dr Heather Holmes-Ross  
Mayor

Jamie Hanlon – Urban Policy Planner & Samantha Grieve  
- Senior Manager City and Corporate Planning – City of  
Playford

---

**From:** Jamie Hanlon [REDACTED]  
**Sent:** Friday, 21 April 2023 4:45 PM  
**To:** DTI:PlanSA Submissions <[plansasubmissions@sa.gov.au](mailto:plansasubmissions@sa.gov.au)>  
**Cc:** Sam Grieve [REDACTED]; Shaun Fielding [REDACTED]  
**Subject:** Attached : City of Playford submission to the Flooding Hazards Mapping Update Code Amendment (Flooding – Evidence Required) Overlay

You don't often get email from [REDACTED]. [Learn why this is important](#)

Good afternoon Code Amendment Team,

Please find attached the City of Playford submission to the Flooding Hazards Mapping Update Code Amendment (Flooding – Evidence Required) Overlay.

Please contact me for any queries.

Regards,



**Jamie Hanlon**  
Urban Policy Planner •  
City of Playford

[REDACTED]  
[REDACTED]  
[REDACTED]

SOUTH AUSTRALIA'S NEW  
PLANNING SYSTEM IS NOW LIVE



## Attachment 1



21 April 2023

Code Amendment Team  
Planning and Land Use Services  
Department for Trade and Investment  
GPO Box 1815  
Adelaide SA 5001

Dear Code Amendment Team

### **Flooding Hazards Mapping Update Code Amendment for consultation**

Thank you for the opportunity to provide comment regarding the draft Flooding Hazards Mapping Update Code Amendment.

The draft Code Amendment seeks to update the extent of the Hazard (Flooding – Evidence Required) Overlay in the Planning and Design Code.

The Flooding – Evidence Required Hazard Overlay on the SAPPA portal currently affects two large areas of the City of Playford. The proposed amendment will remove the Overlay from both areas.

The City of Playford supports the proposed Code Amendment for the following reasons:

- The area affected by the Overlay on the western side of Riverlea and Buckland Park is largely low-lying coastal plains and the Adelaide International Bird Sanctuary where development is uncommon. The land currently within the Evidence Required Hazard Overlay would be impacted by flooding, however given the land is undeveloped and will unlikely be subject to development, the removal of the overlay will present a relatively low risk to the Community.
- The area affected by the Overlay on the eastern side of the City of Playford is within the Adelaide Hills. This area is not completely covered by our current flood maps. Notwithstanding this, mapping indicates that flooding occurs within the watercourses which would be anticipated when development is assessed in this area. Given that this is at the top of the catchment and development impacts to watercourses are also assessed, the risk is relatively low that flooding would not be considered in the assessment of development near a watercourse.



Please contact Jamie Hanlon on [REDACTED] email [REDACTED] if you have any enquiries.

Yours faithfully,



Samantha Grieve  
Senior Manager City and Corporate Planning

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[REDACTED]

## Chris Wiltshire - Assistant Director – Planning, Building and Environment- Housing Industry Australia

---

**From:** Wiltshire, Chris [REDACTED]  
**Sent:** Thursday, 20 April 2023 8:40 AM  
**To:** DTI:PlanSA Submissions <[plansasubmissions@sa.gov.au](mailto:plansasubmissions@sa.gov.au)>  
**Cc:** Knight, Stephen [REDACTED]  
**Subject:** Submission - Flood Hazards Mapping Update Code Amendment - From the HIA

Dear Sir/Madam,

Please find attach our submission for the *Flood Hazards Mapping Update Code Amendment*.

It would be much appreciated if you could kindly respond to this email to confirm receipt of our submission.

Regards,

	<p><b>Chris Wiltshire</b> Assistant Director – Planning, Building and Environment [REDACTED]</p>	<p>Housing Industry Association Ltd [REDACTED] [REDACTED] [REDACTED]</p>
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ACCREDITED  
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HIA BUILDING WOMEN AWARDS  

Attachment 1



HOUSING INDUSTRY ASSOCIATION



Submission to  
Planning and Land Use Services Division

**Flood Hazards Mapping Update Code Amendment**

April 2023



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Housing Industry Association contact:



## ABOUT THE HOUSING INDUSTRY ASSOCIATION

The Housing Industry Association (HIA) is Australia's only national industry association representing the interests of the residential building industry, including new home builders, renovators, trade contractors, land developers, related building professionals, and suppliers and manufacturers of building products.

As the voice of the residential building industry, HIA represents a membership of 60,000 across Australia. HIA members are involved in land development, detached home building, home renovations, low & medium-density housing, high-rise apartment buildings and building product manufacturing.

HIA members comprise a diverse mix of companies including residential volume builders, small to medium builders and renovators, residential developers, trade contractors, building product manufacturers and suppliers and allied building professionals that support the industry.

HIA members construct over 85 per cent of the nation's new building stock.

The residential building industry is one of Australia's most dynamic, innovative and efficient service industries and is a key driver of the Australian economy. The residential building industry has a wide reach into manufacturing, supply, and retail sectors.

Contributing over \$100 billion per annum and accounting for 5.8 per cent of Gross Domestic Product, the residential building industry employs over one million people, representing tens of thousands of small businesses and over 200,000 sub-contractors reliant on the industry for their livelihood.

HIA exists to service the businesses it represents, lobby for the best possible business environment for the building industry and to encourage a responsible and quality driven, affordable residential building development industry. HIA's mission is to:

*'promote policies and provide services which enhance our members' business practices, products and profitability, consistent with the highest standards of professional and commercial conduct.'*

HIA develops and advocates policy on behalf of members to further advance new home building and renovating, enabling members to provide affordable and appropriate housing to the growing Australian population. New policy is generated through a grassroots process that starts with local and regional committees before progressing to the National Policy Congress by which time it has passed through almost 1,000 sets of hands.

Policy development is supported by an ongoing process of collecting and analysing data, forecasting, and providing industry data and insights for members, the general public and on a contract basis.

The Association operates offices in 22 centres around the nation providing a wide range of advocacy, business support services and products for members, including legal, technical, planning, workplace health and safety and business compliance advice, along with training services, contracts and stationary, industry awards for excellence, and member only discounts on goods and services.

## INTRODUCTION

The Flood Hazards Mapping Update Code Amendment (herein referred to as the Amendment) is a consultation document aimed at facilitating change to the Hazards "Flooding – Evidence Required" Overlay (herein referred to as the Overlay). HIA supports the Planning and Land Use Services Division (PLUS) undertaking this review and appreciates how important the Overlay is for Development Assessment.

We agree that an examination of the Overlay is much needed and believe it is an opportunity to ensure planning assessment processes are not hindered by low-risk elements causing unnecessary delays. It is our belief the Amendment has the potential to create a better planning system, allowing a greater number of Development Applications to utilise the Deemed-to-Satisfy (DTS) pathway.

It is important this review considers competing priorities and ensures planning authorities take a holistic approach when enforcing planning objectives, recognising a balance between economic and environmental factors.

The Overlay is detailed in the Planning and Design Code (herein referred to as the Code), this document must be developed with sufficient rigor to eliminate unnecessary regulatory barriers. A fully considered system is one that is reasonable for users to comply with and manageable for regulators to enforce.

A review must analyse cost/benefit outcomes for any proposed change, accomplishing sensible planning provisions in line with consumer affordability. The purpose of a review should be to improve provisions within the Code so that evolving technologies are considered.

This submission offers comments on the Amendment, clarifying our position on proposed mapping. Our response applies to stage 1 of the flood hazard mapping and assessment project, further comments will be provided once stages 2 and 3 are released for consultation.

## 1. BACKGROUND

As part of the planning reform undertaken by the Government, the Code was developed as a key legislative instrument that combined all council planning policies into one document. Its inception heralded a more user friendly and accessible way to inform the community about planning laws associated with Development Applications.

Like most new regulations, the Government gave an opportunity for interested stakeholders and community alike to provide feedback prior to the Codes adoption. It was rolled out over three stages, first in the outback and rural areas before finally being introduced into urban centres.

HIA submitted several detailed responses that aided Government in finalising the document. We provided comment on the three draft codes, one that was issued on February 2019, a second on October 2019 and a third just prior to the final adoption.

Disappointingly, the drafts gave no indication that flood mapping overlays were to be separated into three hazard zones, including a low-risk overlay identified as *Flood – Evidence Required*. HIA was extremely frustrated that no mention was made within the drafts of this tiered system nor the restrictions that would apply at the lowest level.

The Overlay (in question) was an immediate barrier to the DTS pathway for Development Applications. There was little evidence to support its implementation or its relationship to quality development. Although the author of the Amendment states its inception was a result of precautionary measures, HIA does not believe such a reason justified the outcome. In short, it caused many disruptions without reasonable cause.

Had this information been made available during consultation, the Department would have received appropriate advice from interested stakeholders and experts in the field. For future reference, we suggest full disclosure of intentions are outlined so that better results are achieved, and that money is not wasted by us, the industry or PLUS in rectifying issues later.

Nevertheless, we are relieved the Amendment has been issued and offer this submission in good faith that the Department recognises the points raised herein are legitimate to the interests of both our members and the public. These points are supported by national HIA policy, shown within the Appendix.

## 2. AMENDED MAPPING

### 2.1. REDUCTION OF FLOOD MAPPING IN LOCAL GOVERNMENT AREAS

HIA understands the Amendment seeks to substantially reduce the Overlay in the following areas.

#### Local Government

- o City of Burnside
- o Clare & Gilbert Valleys Council
- o City of Marion
- o City of Mitcham
- o City of Mt Gambier
- o City of Onkaparinga
- o City of Playford
- o City of Port Adelaide Enfield
- o City of Port Lincoln
- o City of Salisbury
- o District Council of Coober Pedy
- o Naracoorte Lucindale Council
- o Roxby Downs Council

#### The Outback

- o Andamooka
- o Arkaroola
- o Beltana
- o Blinman
- o Bookabie
- o Copley
- o Fowlers Bay
- o Innamincka
- o Leigh Creek
- o Lyndhurst
- o Marree
- o Nepabunna
- o Oak Valley
- o Olympic Dam
- o Oodnadatta
- o Parachilna
- o Woomera
- o Yalata
- o Amata
- o Fregon
- o Indulkana
- o Kalka
- o Mimili
- o Mintabie
- o Pipalyatjara
- o Pukatja/Ernabella
- o Watarru

HIA supports these reductions for the following reasons.

- 1) Maps better represent the policy, applied in areas relative to the risk.
- 2) The assessment process is simplified.

- 3) Development becomes more affordable, recognising assessment delays are reduced.
- 4) Flexibility is added to building design and material selection.

## 2.2. INCREASE OF FLOOD MAPPING WITHIN PORT ADELAIDE ENFIELD

Acknowledging the background which contributed to this Amendment, HIA would like to express its reservations about the introduction of the Overlay into a new section of the Port Adelaide Enfield region.

Good planning policy involves assessment and determination processes that are reasonable, efficient and relevant to the zoning of the land and other known constraints on the land (refer to the attached HIA policy – *Principles of a Good Planning System*).

HIA believes there must be evidence of *known constraints* to support any new policy; the Amendment does not appear to show this in any detail. Simply, the following statement is given.

*The application of the Overlay is a precautionary measure that will provide a policy framework to address potential flood risk in areas, where the level of flood has not yet been determined- Pg 25.*

Suggesting a policy be administered because of a perceived risk without substantial proof will ultimately lead to the same outcomes we observed in other local government areas, that is a longer assessment timeframe for unjustified reasons.

HIA does not object to policy that responds appropriately to environmental conditions, we do object if the grounds for policy are based on assumptions. If the philosophy for hazard flood mapping mimics past actions, we are likely to get the same disappointing results.

If the Overlay is to be established in new areas of Port Adelaide Enfield, we call for substantive evidence vindicating the reasons why its inclusion is necessary.

## CONCLUSION

HIA believes the Amendment (stage 1) should allow for change that represents the risks associated for each region. We welcome practical solutions that address policies aimed at facilitating a liveable environment, as identified in the states 30-year strategic plan, as well as improving the planning system.

The overarching criteria the Amendment must consider is community needs in conjunction with economic implications for altering flood mapping. Our industry is under enormous pressure because of trade and material shortages, so it is important the correct decisions are made.

By and large, HIA views the addendums to flood mapping as a step in the right direction but has deep concerns about the introduction of an additional Overlay into Port Adelaide Enfield.

Above all, the planning system relies on the speed of delivery and quality outcomes, the points we have raised are an effort to assist both. We implore PLUS come up with appropriate solutions for the Code based on an agreed position between industry and the government. HIA welcomes the opportunity to discuss these matters further and wait for your subsequent response.

## Appendix



## HIA Policy

## Principles of a Good Planning System

### Policy Background

- In 2001, HIA launched a national position statement on planning systems, known as Better Living Environments. The position statement focused on three core tenants – flexibility, predictability and affordability. Within these tenants, various case studies and examples of good planning practices that would assist in the delivery of new land and housing were identified.
- Following Better Living Environments HIA has developed a series of policy statements that address individual elements of the planning system, covering issues such as 'truth in zoning', managing urban land supply, development contributions, subsidised affordable housing and more. Today these planning policy statements form the basis of HIA's advocacy for an improved planning system.
- It was agreed there would be benefit in creating a statement that concisely sets out the fundamentals of a good planning system that can serve as a foundation statement on the planning system and the delivery of land and residential developments.

### Policy Issues

- In the absence of other regulatory levers, the planning system is now seen as the panacea for any matter that governments believe warrants oversight, making the system extremely complex for all parties to navigate.
- Over the last decade, policy makers have sought to address a growing list of social and environmental issues that have not traditionally been matters for consideration in the planning system.
- A planning system must recognise the importance of delivering housing affordable outcomes. This can only be achieved where the planning system manages the zoning of land and the development of that land in a timely manner balancing the social, economic and environmental benefit of the whole community.

### HIA's Policy Position on Principles of a Good Planning System

#### 1. Certainty

- a. The planning system must provide certainty to those utilising it.
- b. Planning codes and policy must be clearly written to provide certainty to the users and planning authorities of the items that are required to be addressed and the available scope for discretion in decision making
- c. Assessment and determination processes must be reasonable, efficient and relevant to the zoning of the land and other known constraints on the land.
- d. The planning system should seek to eliminate repetition and duplication of information requests and assessments.
- e. Planning application requirements must not overlap or exceed building application requirements.

- f. Planning systems must support truth in zoning by facilitating the development of permitted land uses within each zone.
  - g. Planning systems should not permit the retrospective application of 'new' requirements or constraints unless compensation is provided to property owners who lose a development right.
  - h. Fees and charges for planning services should reflect the cost of assessment, be readily calculated and be disclosed prior to lodgement of any application.
  - i. Planning codes and policies should not incorporate technical building requirements.
- 2. Consistency**
- a. Policies developed to guide planning decisions must be written in concise language and be readily and consistently interpreted.
  - b. The planning system should support consistency of outcomes by providing adequate guidance for design development and decision making.
  - c. Planning design codes should be applied at the highest level (i.e. state government) to avoid ad-hoc design standards across individual local council areas.
- 3. Flexibility**
- a. Planning codes and policy should include both performance objectives and prescriptive standards to provide a degree of flexibility and support changing housing market trends and innovation in housing design and technology.
- 4. Transparency**
- a. The planning system should be transparent to the community and the development industry.
  - b. Planning decisions should be easily understood and have limited potential for real or perceived intervention or influence.
- 5. Simple, clear processes**
- a. The planning system should provide processes that do not create undue regulatory burdens for users.
  - b. Information requirements should be concise, with clear obligations, steps and timelines for the provision of details to the planning authority by an applicant.
  - c. Planning assessment and determination processes must be reasonable, efficient and relevant to the zoning of the land and type of development proposed.
  - d. The planning and building systems must provide a single approval pathway for single dwellings and dual occupancy dwellings on land zoned for residential development.
- 6. Strategically led planning**
- a. The planning system should embed a strategic approach to spatial planning which balances competing priorities and requires planning authorities to take a holistic approach to achieving planning outcomes, recognising a balance between economic, social and environmental factors.
- 7. Independent, merit based decisions**
- b. Planning decisions should be made by informed, independent parties based on the merits of the application, compliance with any relevant statutory requirements and a sound evidence base.

**8. Accountability for decisions**

- a. Planning system should provide clear accountability for the decision making processes and the decisions made on behalf of the community.
- b. All planning decisions (zoning, subdivision, development) should be provided with a right of appeal to an independent administrative body.
- c. The planning system should not allow multiple planning authorities or agencies to be responsible for overlapping requirements or the duplication of requirements and approval obligations.

**9. Outcome oriented decisions**

- a. Decisions in an effective planning system must be focused on the outcomes, rather than details that have little bearing on the impact of development on the community.
- b. The planning system should facilitate:
  - i. The development of land in an economically viable manner in accordance with its zoning.
  - ii. The timely zoning of land for residential purposes based on a transparent strategic assessment involving all relevant agencies with clear roles and responsibilities for all stakeholders.
  - iii. Governments managing land supply, in consultation with the residential development industry, to ensure there is an adequate supply of land at each stage of the land supply pipeline.
  - iv. The delivery of public infrastructure that supports residential land zoning and development in a timely manner for the social and environmental benefit of the whole community.

**10. Timely decision making**

- a. Timely decision making means compliance with statutory timeframes where they exist, recognition of the importance of economic investment that results from development approvals and agreement between decision makers and applicants on a program to decision making.

Moira Were AM – Mayor & Mathew Lawrence – Manager  
of Development Services – Stormwater Management  
Authority - City of Onkaparinga

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From: Trudi Charlton [REDACTED]  
Sent: Thursday, 20 April 2023 10:21 AM  
To: DTI:PlanSA Submissions <[plansasubmissions@sa.gov.au](mailto:plansasubmissions@sa.gov.au)>  
Subject: Submission - Flood Hazards Mapping Update Code Amendment

Dear Mr Reynolds

On behalf of Mayor Moira Were AM, please find attached the Submission Letter from the City of Onkaparinga for the Flood Hazards Mapping Update Code Amendment.

Kind regards

Trudi Charlton  
Executive Assistant to Director Corporate  
Executive Assistant to Director Planning and Regulatory Services



20 April 2023  
Our ref: 5923602  
Your ref: 19841726



Mr David Reynolds  
Chief Executive  
C/- Code Amendment Team  
Planning and Land Use Services  
Department for Trade and Investment  
via email: [plansasubmissions@sa.gov.au](mailto:plansasubmissions@sa.gov.au)

Dear David

Thank you for the opportunity to provide comment on the Flooding Hazard Mapping Update Code Amendment. We understand that this Code Amendment is part of a multi-stage approach to the Flood Hazard Mapping and Assessment Project.

We have reviewed the Code Amendment as provided and have no objection. We note the Code Amendment seeks to update the extent of the Hazard (Flooding – Evidence Required) Overlay in the Planning and Design Code on the basis it was applied by the State Planning Commission as a precautionary measure to a wide area across the state where flood mapping was not available when the Planning and Design Code was implemented in March 2021.

We note and support the Hazard (Flooding – Evidence Required) Overlay remaining in place over identified watercourses to ensure protection of adjacent properties.

As Stage 2 of the Project involves new flood studies which will inform new mapping for the entire state, we look forward to further discussion later this year as this relates to Stage 3, the State-wide Flooding Hazards Code Amendment and what this means for the City of Onkaparinga and our community.

Noting the anticipated effects of climate change may mean we experience less rainfall overall; the modelling scenarios indicate there will be more intense storms and flooding. Therefore, the provision of revised and updated flood mapping assists in managing risks to council and community assets.

Given the importance of managing and protecting our community and our environment from flooding, we commend the Department on undertaking this important work and look forward to working together on the next stage, the State-wide Flood Hazards Code Amendment later this year.

Should you have any questions, please do not hesitate to contact Matthew Lawrence, Manager Development Services on [REDACTED] or [REDACTED]

Yours sincerely

A handwritten signature in blue ink that reads 'Moira Were'.

Moira Were AM  
Mayor

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CITY OF ONKAPARINGA

[REDACTED]

## Patrick Mitchell - Principle Planner – Walker Corporation

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From: Patrick Mitchell [REDACTED]  
Sent: Thursday, 20 April 2023 9:51 AM  
To: DTI:PlanSA Submissions <[plansasubmissions@sa.gov.au](mailto:plansasubmissions@sa.gov.au)>  
Subject: Submission - The Flooding Hazards Mapping Update Code Amendment

### The Flooding Hazards Mapping Update Code Amendment

Thank you for the opportunity to comment on the Flooding Hazards Mapping Update Code Amendment.

Walker's interest concerns expediting Stage 2 of the broader Project involving PLUS procuring new flood studies to inform new mapping for the entire State. In addition, Walker seeks to ensure that mechanisms be put in place to ensure the efficient updating of this mapping when on-the-ground situations change.

Walker is aware that the current mapping (as shown on the PlanSA – SA Property and Planning Atlas (SAPPA) website) is not keeping pace with new residential subdivisions, and property purchasers may be subjected to unnecessary insurance costs. This is no more evident than with the SAPPA mapping for the Riverlea development at Riverlea Park, where subdivision works raise site levels and create drainage channels to address potential flood risk. The examples below show instances where subdivision works have raised ground levels and implemented drainage channels to mitigate flood risk, yet the SAPPA mapping has not kept pace or recognised these flood mitigation works.



Hazards (Flooding – General) Overlay

Hazards (Flooding) Overlay

Stage 3 of the Project will integrate the new mapping (arising from Stage 2) into the Code via a second State-wide Flooding Hazards Code Amendment (anticipated for consultation in later 2023). While the new mapping might address present conditions, PLUS must be cognisant that a flexible and efficient instrument needs to be in place to update this mapping promptly (in real-time) without the bother and costs associated with undertaking further protracted Code Amendment processes.

PLUS's recently released consultation document, "Frequently Asked Questions," recognises that the "insurance industry uses a range of flood maps and studies from local, state, Commonwealth and private sources to set insurance premiums for properties" and flood-prone addresses near the Gawler River (amongst other areas) have the attention of the Insurance Council of Australia for

insurance purposes. Therefore, timely updated flood hazard mapping is essential to provide greater certainty concerning generating more accurate insurance premiums.

Accordingly, Walker supports PLUS procuring new flood studies to inform new mapping for flood-prone areas. However, Walker is cognisant that PLUS must adopt practical mechanisms to permit efficient updates to the mapping when on-the-ground situations change. This approach will genuinely enhance the performance, adaptation and efficient operation of the Code as it relates to this issue.

Thank you for consideration of this submission. I look forward to providing additional feedback on Stage 3 of the Project later in 2023.

Kind regards

Pat  
Patrick Mitchell  
Principal Planner



Walker Corporation

[Redacted contact information]

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Georgina Burgess – Planner - Waikato Regional Council  
in New Zealand - [REDACTED] & Tim  
Hodges – Architect – [REDACTED]

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Attended Online Community Information session.

Raised concerns about the frustration and cost involved with needing to engage a flood engineer to determine flood levels when developing in flood prone areas.

Suggested that the system should provide this information in the same way that Queensland do.

Raised a number of comparisons and differences between our system and the system being used in NZ.

Discussed her frustration with the use of private consultants being asked to undertake flood reports and how this results in the production of biased data.

Raised the importance of making sure that flood mapping remains current and relevant.

