



## **Addendum in Response to Logan City Council Agenda of Special Council Meeting for Thursday 4 June, 2022 9am**

The Logan Community Alliance Inc provides the following addendum to its submission regarding the proposed flood planning policy refinements, Logan Flood Portal updates, Temporary Local Planning Instrument (TLPI) and related matters considered in the Special Council Meeting agenda.

This addendum is intended to assist Council by clarifying key matters arising from the agenda papers, identifying additional considerations relevant to implementation, and highlighting areas where further information, transparency, or refinement may support more robust decision-making.

### **1. Integration of Technical Findings and Policy Decisions**

The agenda identifies a range of proposed amendments to flood mapping, terminology, and policy settings, including the removal of Probable Maximum Flood (PMF) and 0.05% AEP mapping from planning scheme overlays, and the introduction of revised flood planning areas (FPA1–FPA4).

Given the scale and implications of these changes, to strengthen transparency and confidence in the evidentiary basis for the proposed changes, it is considered important that Council clearly articulate:

- the specific linkage between the Restore Blue independent review findings, WRM responses, and each recommended policy change;
- how removal of the PMF will impact properties mapped in the high and low flood island categories;
- how remaining technical uncertainties identified in peer reviews are being resolved or managed prior to adoption; and
- whether any material differences exist between consultant recommendations and Council officer recommendations, and how these have been reconciled.

### **2. Transitional Risk and Reliance on Updated Mapping**

The proposed introduction of a new Temporary Local Planning Instrument (TLPI) implementing revised flood mapping raises important transitional considerations. Clear transitional arrangements are critical to maintaining certainty for both the community and development industry.

In particular, further clarification would be beneficial regarding:

- how existing approvals and development applications currently relying on existing flood mapping will be treated;
- whether any transitional provisions will apply to ensure consistency between the TLPI, draft Logan Plan, and existing planning scheme provisions; and
- how Council will manage potential inconsistency between updated mapping and State Planning Policy requirements during the transition period.

### **3. Shelter-in-Place Policy and other Planning Scheme Provision Revisions**

The recommendation to maintain a shelter-in-place duration of less than 36 hours is noted, however, the proposed changes do not provide alignment with a performance-based planning framework as they continue to impose a quantitative benchmark to be met under the performance outcome.

It would be useful for Council to consider:

- Implementing a more performance-based approach in the performance outcomes across the Flood Code to allow Council greater flexibility to favourably assess developments that achieve an acceptable or tolerable level of risk, irrespective of specific isolation timeframes. This empowers Council with greater delegated discretionary powers to address mapping errors, effective alternative flood mitigation measures and other mitigating circumstances (see section 13.1 of our main response);
- Application of more performance-based benchmarks across the Flood Planning Code will provide Council will greater latitude to manage uncertainty and allow development assessment processes to continue in the transition phase between the existing and proposed planning scheme. This is particularly important when considering the proposed 2030 timeframe for delivering the new Logan Planning Scheme.

#### **4. FPA4 Flood Planning Area**

The introduction of Flood Planning Area 4 (FPA4) is a material change in how shallow, less hazardous flooding areas are treated.

To more effectively support this proposed change, further consideration would be beneficial regarding:

- How these areas were previously classified under existing hazard categories, what has changed in the underlying interpretation of risk level and how this will impact on properties mapped within the Low and Moderate risk categories.
- It is noted that both the Low and Moderate flood risk categories encompass a high distribution of flood risk levels, meaning the proposed changes would impact properties mapped within this category differently:
  - Low Risk incorporates H1 at PMF frequency through to H4 at 0.05% AEP;
  - Moderate Risk incorporates H1 at 0.5% AEP through to H2 at 1% AEP.
- If and how redistribution of flood events might occur within the Flood Risk Matrix due to the combined impacts of removing the PMF and 0.05% AEP level events and expanding flood risk categories to incorporate four levels of risk;
- Whether a broader review of the Risk Matrix could be incorporated into this proposed amendment to more accurately and fairly categorise risk (see section 11 of our main response).

The Logan Community Alliance Inc supports Council's initiatives in improving clarity, usability, and community understanding of flood risk information, however, we respectfully request for Council expand their policy considerations to include the full risk of issues identified in in our main response.