

Submission form for the draft Murrumbidgee Valley Floodplain Management Plan: Stage 2 public exhibition

How to fill out this form

The NSW Department of Climate Change, Energy, the Environment and Water is seeking your feedback on the draft Murrumbidgee Valley Floodplain Management Plan.

We are seeking feedback through a public exhibition process from Monday 19 August to Sunday 29 September 2024. The publication *Draft Murrumbidgee Valley Floodplain Management Plan – Report to assist Stage 2 public exhibition* provides information that can help you to complete this submission form. This report is available on the department's website at:

water.nsw.gov.au/murrumbidgee-floodplain-management-plan

To provide feedback on the management zones shown in Figure 3 in the report and on the [interactive spatial map](#), we recommend you:

1. take a screenshot of the relevant area/s displayed on the interactive spatial map
2. use a drawing tool to illustrate feedback or refer to the area shown in written feedback
3. save the screenshot of the map as an image file and attach it to your submission.

Mandatory questions are indicated with an asterisk (*).

How to submit your feedback

Have your say by Sunday 29 September 2024.

Save or print the completed submission form and send it via:

Email: floodplain.planning@dpie.nsw.gov.au OR

Post: Murrumbidgee Valley FMP

Water Group – NSW DCCEEW

PO Box 189

Queanbeyan NSW 2620

Information on privacy and confidentiality

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Privacy questions

Do you give permission for your name to be published with your submission? *

☐ Yes

☐ No

If you are answering on behalf of an organisation, do you give permission for your organisation's name to be published? *

☐ Yes

☐ No

☒ Not applicable

Your details

Details	
1. Given name *	Errol Winston
2. Family name *	Bradbury
3. Email address *	[REDACTED]
4. Address	[REDACTED]
5. Phone number	[REDACTED]
6. Are you making this submission as an individual or as a representative of an organisation? * (Mark only one)	<input type="checkbox"/> Individual (skip to question 9) <input type="checkbox"/> Organisation
7. Name of organisation	
8. Who do you represent? *	<input type="checkbox"/> Government <input type="checkbox"/> Peak representative organisation <input type="checkbox"/> Aboriginal organisation <input type="checkbox"/> Environmental organisation <input type="checkbox"/> Irrigation industry <input type="checkbox"/> Mining industry <input type="checkbox"/> Other (please specify):
9. Have you read the <u>Draft Murrumbidgee Valley Floodplain Management Plan – Report to assist Stage 2 public exhibition?</u> *	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
10. Did/will you attend any of the following in relation to the Murrumbidgee Valley Floodplain Management Plan?	<input checked="" type="checkbox"/> An individual appointment <input type="checkbox"/> A phone call with departmental staff <input type="checkbox"/> A group meeting with departmental staff <input type="checkbox"/> None of these

The following sections relate to the feedback we are seeking on the draft floodplain management plan as described in the Report to assist public exhibition. Follow the steps on page 1 to provide feedback on the management zones shown in Figure 3.

Proposed management zones

The proposed management zones represent the hydraulic, ecological or Aboriginal cultural (or combination of) attributes of the land. Different rules and assessment criteria apply to each management zone. These reflect the nature of the area and consider the impact that a flood work may have on the movement of flood water, and risk to life and property.

For more information, please refer to Figure 3 and section 3 in the [Report to assist public exhibition](#). For a higher resolution version of the proposed management zones, see the [interactive spatial map](#).

<p>Please provide any comments you may have on the proposed management zones.</p> <p><i>(If relevant please attach a map to your submission.)</i></p>	<p>The border between zone A and B needs to be re-aligned to follow the edge of the highlighted higher ground. I have already sent a modified map but apparently the form was blank. hopefully I will do better this time.</p>
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Proposed rules and assessment criteria for management zone A and SP

Flood works in management zone A and SP will be restricted to specific types that are essential for the protection of life and property, or improvement of the floodplain. Each type of flood work permitted will be subject to size or height restrictions to minimise the impact on the passage of floodwater.

For more information, please refer to section 4.1.1 and Table 1 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the flood work types permitted within management zone A and SP and associated specifications.

All flood works in management zone A and SP will be assessed using the standard assessment criteria. Enhancement flood works will also be assessed using the hydraulic assessment criteria.

For more information, please refer to section 4.1.1 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for management zone A and SP.

Additional types of flood works are permitted within management zone A and SP if they were constructed prior to the commencement of the draft floodplain management plan, subject to complying with the standard assessment criteria.

For more information, please refer to section 4.1.1.2 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for existing unapproved works in management zone A and SP.

Proposed rules and assessment criteria for management zone B

Any type of flood work will be permitted in management zone B, subject to assessment using the standard assessment criteria. Larger flood works in management zone B will require advertisement and assessment using the hydraulic assessment criteria.

There is no difference in the rules and assessment criteria for flood works constructed prior to or after the draft floodplain management plan commences.

For more information, please refer to section 4.1.2, 4.2 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for management zone B.	
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Proposed rules and assessment criteria for management zone C and CU

Any type of flood work will be permitted in management zone C and CU, subject to assessment using the standard assessment criteria. Flood works that may have a significant impact on high value infrastructure will require assessment using the hydraulic assessment criteria.

There is no difference in the rules and assessment criteria for flood works constructed prior to or after the draft floodplain management plan commences.

For more information, please refer to section 4.1.2, 4.2 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for management zone C and CU.

Proposed mandatory conditions

The draft floodplain management plan proposes three mandatory conditions that will apply to flood work approvals:

1. After a flood work is removed, the area it was located must be returned to the height of the natural surface of the ground.
2. Notice must be given to WaterNSW once a flood work is constructed.
3. Erosion must be prevented during the construction and use of a flood work.

For more information, please refer to section 5.3 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed mandatory conditions.
(If relevant please attach a map to your submission.)

Proposed amendment provisions

The draft floodplain management plan sets out the circumstances when the plan may be amended in the future. Of note, it proposes to amend the plan before 1 July 2028 to include rules and assessment criteria that consider the effects of climate change.

For more information, please refer to section 5.4 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed amendment provisions.

(If relevant please attach a map to your submission.)

Additional information

If you have any other comments on the draft floodplain management plan, please provide them here.

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During the last and very high flows of 2022 a major impediment to water flow was the access road to the Balranald low level weir. The only other way to bypass the bottleneck at the weir is via farming land to the south of the river, which did overtop, but had there been a significant culvert installed at the low section of road it would have eased the level of that upstream section of river, including the township of Balranald, which was under some serious stress.

If you would like to provide any additional information to help us understand your feedback, please attach this to your submission.

The following questions help us understand how effective our communication and engagement activities are in reaching our diverse community and stakeholders. This enables us to communicate more clearly and improve opportunities for everybody to have their say.

How did you hear about this consultation? *

- ☐ Community group
- ☐ Department's website
- ☐ Email or newsletter from the department
- ☐ Letter
- ☐ Newspaper advertisement
- ☐ Social media
- ☐ Word of mouth
- ☐ Other (please specify):

Do you identify as Aboriginal and/or Torres Strait Islander? *



Do you speak a language other than English at home? *	<div><div></div><div></div><div></div></div>
Would you like to sign up to our monthly Water newsletter to stay informed and have your say about water planning, management and reform across NSW?	<div><div><input checked="" type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div><div><input type="checkbox"/> I've already subscribed</div></div>

Thank you for taking the time to complete this form.

[REDACTED]
[REDACTED]
Mon 16/09/2024 5:15 AM

To: Water Floodplain Management Planning Mailbox <floodplain.planning@dpie.nsw.gov.au>

Dear Sir,

I am putting forward a submission for consideration re. [REDACTED], in Narrandera.

It is based purely on my observation during major flooding in 2012 where the Flood Level reached 8.989m

During that time walking along the Levee Bank on the South side of Lake Talbot the flood waters were mere millimeters from spilling over the levee.

If in the event a future flood was to exceed 9m and was to spill over into the void of an empty Lake Talbot, therefore causing a weakness in the levee, in my humble opinion could put the current Critical Infrastructure at risk.

The consequences of that occurring could be devastating [REDACTED]

Yours sincerely,
[REDACTED]

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☒ No

If you are answering on behalf of an organisation, do you give permission for your organisation's name to be published? *

☐ Yes

☒ No

☐ Not applicable

Your details

Details	
1. Given name *	[REDACTED]
2. Family name *	[REDACTED]
3. Email address *	[REDACTED]
4. Address	[REDACTED] [REDACTED] [REDACTED]
5. Phone number	[REDACTED]
6. Are you making this submission as an individual or as a representative of an organisation? * (Mark only one)	<input type="checkbox"/> Individual (skip to question 9) <input checked="" type="checkbox"/> Organisation
7. Name of organisation	Altina Wildlife Park
8. Who do you represent? *	<input type="checkbox"/> Government <input type="checkbox"/> Peak representative organisation <input type="checkbox"/> Aboriginal organisation <input checked="" type="checkbox"/> Environmental organisation <input type="checkbox"/> Irrigation industry <input type="checkbox"/> Mining industry <input type="checkbox"/> Other (please specify):
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For more information, please refer to Figure 3 and section 3 in the [Report to assist public exhibition](#). For a higher resolution version of the proposed management zones, see the [interactive spatial map](#).

<p>Please provide any comments you may have on the proposed management zones.</p> <p><i>(If relevant please attach a map to your submission.)</i></p>	<p>The management zones and associated rules are too restrictive. I need to be able to protect the [REDACTED] from flooding, in particular potential higher and more frequent environmental flows.</p> <p>I have an existing approved levee bank around the northern and western sides of the [REDACTED] but I am concerned that it is not enough to protect [REDACTED] from natural flooding or higher environmental flows constantly eroding my Levees but worse still for the Eastern and Southern Sides of [REDACTED] that are not protected by Levees. The [REDACTED] is part of internationally significant [REDACTED] and is high value infrastructure.</p> <p>I am also concerned with the amount of additional financial stress that would be required to repair our existing levee on the North and Western sides and protect the Southern and Eastern side of [REDACTED] from potential flood damage.</p> <p>See attached map.</p>
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Proposed rules and assessment criteria for management zone A and SP

Flood works in management zone A and SP will be restricted to specific types that are essential for the protection of life and property, or improvement of the floodplain. Each type of flood work permitted will be subject to size or height restrictions to minimise the impact on the passage of floodwater.

For more information, please refer to section 4.1.1 and Table 1 in the [Report to assist public exhibition](#).

<p>Please provide any comments you may have on the flood work types permitted within management zone A and SP and associated specifications.</p>	<p>The rules are too restrictive in the area to the West and East of [REDACTED] as I need to be able to provide protection [REDACTED].</p>
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All flood works in management zone A and SP will be assessed using the standard assessment criteria. Enhancement flood works will also be assessed using the hydraulic assessment criteria.

For more information, please refer to section 4.1.1 and Table 2 in the [Report to assist public exhibition](#).

<p>Please provide any comments you may have on the proposed rules and assessment criteria for management zone A and SP.</p>	<p>Again the rules are too restrictive in the area to the West and East of the [REDACTED] as I need to be able to provide protection [REDACTED].</p>
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Additional types of flood works are permitted within management zone A and SP if they were constructed prior to the commencement of the draft floodplain management plan, subject to complying with the standard assessment criteria.

For more information, please refer to section 4.1.1.2 and Table 2 in the [Report to assist public exhibition](#).

<p>Please provide any comments you may have on the proposed rules and assessment criteria for existing unapproved works in management zone A and SP.</p>	<p>Unfortunately we are not able to even apply for a levee on the Eastern and Southern side of [REDACTED] as is not financially possible either prior to or even when this proposed Floodplain management plan is implemented. If this new plan is implemented then it will leave us open for potentially disastrous damages or loss of animal life or even human life if trying to protect animals from drowning.</p>
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Proposed rules and assessment criteria for management zone B

Any type of flood work will be permitted in management zone B, subject to assessment using the standard assessment criteria. Larger flood works in management zone B will require advertisement and assessment using the hydraulic assessment criteria.

There is no difference in the rules and assessment criteria for flood works constructed prior to or after the draft floodplain management plan commences.

For more information, please refer to section 4.1.2, 4.2 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for management zone B.	At this point in time we have been delegated to be subject to Categories A and/or SP.
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Proposed rules and assessment criteria for management zone C and CU

Any type of flood work will be permitted in management zone C and CU, subject to assessment using the standard assessment criteria. Flood works that may have a significant impact on high value infrastructure will require assessment using the hydraulic assessment criteria.

There is no difference in the rules and assessment criteria for flood works constructed prior to or after the draft floodplain management plan commences.

For more information, please refer to section 4.1.2, 4.2 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for management zone C and CU.

At this point in time we have been delegated to be subject to Categories A and/or SP.

Proposed mandatory conditions

The draft floodplain management plan proposes three mandatory conditions that will apply to flood work approvals:

1. After a flood work is removed, the area it was located must be returned to the height of the natural surface of the ground.
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Please provide any comments you may have on the proposed mandatory conditions.
(If relevant please attach a map to your submission.)

Our Levee on the Western and Northern side of [REDACTED] will not be removed whilst [REDACTED] to ensure some safety against flooding from the sides mentioned above. These are approved works and need to stay in place. Placing a condition that erosion must be prevented is ordinarily acceptable from natural flooding but to ask us to continually spend valuable financial resources of mending levees that are Government approved is not practical. Government should fund the repairs as it is they that want to put this New Plan into action.

Proposed amendment provisions

The draft floodplain management plan sets out the circumstances when the plan may be amended in the future. Of note, it proposes to amend the plan before 1 July 2028 to include rules and assessment criteria that consider the effects of climate change.

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Please provide any comments you may have on the proposed amendment provisions.

(If relevant please attach a map to your submission.)

Amending the plan in the future should address all areas of concern from all landholders and if finances are issues for future plan modifications then Government should financially assist landholders in achieving total protection.

Additional information

If you have any other comments on the draft floodplain management plan, please provide them here.

(If relevant please attach a map to your submission.)

The cost to protect [REDACTED] from flooding, including from potential higher environmental flows, is prohibitive. More support should be provided to help protect significant assets such as ours..

If you would like to provide any additional information to help us understand your feedback, please attach this to your submission.

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- ☐ Word of mouth
- ☐ Other (please specify):

Do you identify as Aboriginal and/or Torres Strait Islander? *



Do you speak a language other than English at home? *	<div><div></div><div></div><div></div><div></div></div>
Would you like to sign up to our monthly Water newsletter to stay informed and have your say about water planning, management and reform across NSW?	<div><div><input checked="" type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div><div><input type="checkbox"/> I've already subscribed</div></div>

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Your details

Details	
1. Given name *	<input type="text"/>
2. Family name *	<input type="text"/>
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4. Address	<input type="text"/>
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<p>Please provide any comments you may have on the proposed management zones.</p> <p><i>(If relevant please attach a map to your submission.)</i></p>	<p>The management zones around [REDACTED] are generally acceptable. Some minor refinements suggested (see attached maps), particularly around the house and Management zone A connectors behind the approved bank.</p> <p>Also would like to review how water moves through Tarwillie swamp into Narkungerie creek. Water used to run from [REDACTED], now appears to have been blocked.</p> <p>Water moving from [REDACTED] has also been severely restricted in recent times?.</p>
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(If relevant please attach a map to your submission.)

If you would like to provide any additional information to help us understand your feedback, please attach this to your submission.

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- ☐ Community group
- ☐ Department's website
- ☐ Email or newsletter from the department
- ☐ Letter
- ☐ Newspaper advertisement
- ☐ Social media
- ☐ Word of mouth
- ☐ Other (please specify):

Do you identify as Aboriginal and/or Torres Strait Islander? *



Do you speak a language other than English at home? *



Would you like to sign up to our monthly Water newsletter to stay informed and have your say about water planning, management and reform across NSW?

- ☒ Yes
- ☐ No
- ☐ I've already subscribed

Thank you for taking the time to complete this form.

Submission form for the draft Murrumbidgee Valley Floodplain Management Plan: Stage 2 public exhibition

How to fill out this form

The NSW Department of Climate Change, Energy, the Environment and Water is seeking your feedback on the draft Murrumbidgee Valley Floodplain Management Plan.

We are seeking feedback through a public exhibition process from Monday 19 August to Sunday 29 September 2024. The publication *Draft Murrumbidgee Valley Floodplain Management Plan – Report to assist Stage 2 public exhibition* provides information that can help you to complete this submission form. This report is available on the department's website at:

water.nsw.gov.au/murrumbidgee-floodplain-management-plan

To provide feedback on the management zones shown in Figure 3 in the report and on the [interactive spatial map](#), we recommend you:

1. take a screenshot of the relevant area/s displayed on the interactive spatial map
2. use a drawing tool to illustrate feedback or refer to the area shown in written feedback
3. save the screenshot of the map as an image file and attach it to your submission.

Mandatory questions are indicated with an asterisk (*).

How to submit your feedback

Have your say by Sunday 29 September 2024.

Save or print the completed submission form and send it via:

Email: floodplain.planning@dpie.nsw.gov.au OR

Post: Murrumbidgee Valley FMP

Water Group – NSW DCCEEW

PO Box 189

Queanbeyan NSW 2620

Information on privacy and confidentiality

All submissions, including maps, received by the NSW Department of Climate Change, Energy, the Environment and Water will be reviewed and published. The department values your input and accepts that information you provide may be private and personal.

When publishing submissions, including maps, the department will make every effort to redact personal and identifying information (your name will be published if you provide us with permission to do so).

If you want your name to be treated as confidential, please indicate this by ticking the relevant box below.

Your information will be handled by the department in accordance with the [Privacy and Personal Information Protection Act 1998](#). Any personal information you provide in completing this form will only be used to inform the development of the Murrumbidgee Valley Floodplain Management Plan. We will not use or disclose the information for any other purpose, unless required or authorised to do so.

If you would like to know more about how the department meets its obligations in collecting, storing, using and sharing personal information, you can read our [Privacy statement](#) or [Privacy Management Plan](#).

If you wish to view or amend the information held by us, you can email us at floodplain.planning@dpie.nsw.gov.au, or contact the department's Information Access and Privacy Unit on 02 9860 1440 or at privacy.dcceew@environment.nsw.gov.au.

Privacy questions

Do you give permission for your name to be published with your submission? *

☐ Yes

☒ No

If you are answering on behalf of an organisation, do you give permission for your organisation's name to be published? *

☐ Yes

☐ No

☒ Not applicable

Your details

Details	
1. Given name *	██████
2. Family name *	██████
3. Email address *	████████████████████
4. Address	██████████ ██████████
5. Phone number	████████
6. Are you making this submission as an individual or as a representative of an organisation? * (Mark only one)	<input type="checkbox"/> Individual (skip to question 9) <input type="checkbox"/> Organisation
7. Name of organisation	
8. Who do you represent? *	<input type="checkbox"/> Government <input type="checkbox"/> Peak representative organisation <input type="checkbox"/> Aboriginal organisation <input type="checkbox"/> Environmental organisation <input type="checkbox"/> Irrigation industry <input type="checkbox"/> Mining industry <input type="checkbox"/> Other (please specify):
9. Have you read the <u>Draft Murrumbidgee Valley Floodplain Management Plan – Report to assist Stage 2 public exhibition?</u> *	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
10. Did/will you attend any of the following in relation to the Murrumbidgee Valley Floodplain Management Plan?	<input checked="" type="checkbox"/> An individual appointment <input type="checkbox"/> A phone call with departmental staff <input type="checkbox"/> A group meeting with departmental staff <input type="checkbox"/> None of these

The following sections relate to the feedback we are seeking on the draft floodplain management plan as described in the Report to assist public exhibition. Follow the steps on page 1 to provide feedback on the management zones shown in Figure 3.

Proposed management zones

The proposed management zones represent the hydraulic, ecological or Aboriginal cultural (or combination of) attributes of the land. Different rules and assessment criteria apply to each management zone. These reflect the nature of the area and consider the impact that a flood work may have on the movement of flood water, and risk to life and property.

For more information, please refer to Figure 3 and section 3 in the [Report to assist public exhibition](#). For a higher resolution version of the proposed management zones, see the [interactive spatial map](#).

<p>Please provide any comments you may have on the proposed management zones.</p> <p><i>(If relevant please attach a map to your submission.)</i></p>	<p>Agree, protecting passage and connectivity of floodwater and better management of floodworks is needed in future. However, it is critical that management zones are correctly identified in the initial phase.</p> <p>I manage a property [REDACTED] situated on the [REDACTED]. All supporting maps for the following submission are based upon the property [REDACTED] and immediate surrounding area. (Refer to Map 1)</p> <p>Unsure exactly what hydrological modelling the various zones allocated have been based upon. If it is to be for "large extent" flood event such as 2012, (refer to Map 2);</p> <p>1). The spatial map indicates many areas where there is ground development and obviously levees/embankments holding water out/diverting flows. Some are precluded from Zones A and B whilst clearly within these zones - how is this modelled or is it due to a works approval?</p> <p>2). How can an arbitrary line such as the Sturt Highway constitute the flood boundary - this is hydrologically incorrect. The boundary extends much further (if allowed in a large flood)</p> <p>3) The mapping looks to have not fully taken into account land elevation and natural passage but rather relied on the footprint of prior floods to determine the zones.</p>
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Proposed rules and assessment criteria for management zone A and SP

Flood works in management zone A and SP will be restricted to specific types that are essential for the protection of life and property, or improvement of the floodplain. Each type of flood work permitted will be subject to size or height restrictions to minimise the impact on the passage of floodwater.

For more information, please refer to section 4.1.1 and Table 1 in the [Report to assist public exhibition](#).

<p>Please provide any comments you may have on the flood work types permitted within management zone A and SP and associated specifications.</p>	<p>Floodwork type and specifications should "fit" the circumstances and hydrological modelling rather than comply with restrictive rules set out in Draft Plan. Size and height limitations do not match</p> <p>For example (Map 3) [REDACTED] regularly conveys large volumes environmental water to ecologically important sites (including SP and A Zones) via a channel system. The same system normally conveys irrigation water. However in floods, it also diverts floodwaters (favourably), inherently provides property and infrastructure protection as well as access. How will the floodwork be assessed given its multiple roles and undoubtedly exceeding specifications?</p> <p>Narrow scope and limitations of floodworks under Plan for Zones A and SP could potentially be restrictive and actually negatively impact Plan objectives.</p>
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All flood works in management zone A and SP will be assessed using the standard assessment criteria. Enhancement flood works will also be assessed using the hydraulic assessment criteria.

For more information, please refer to section 4.1.1 and Table 2 in the [Report to assist public exhibition](#).

<p>Please provide any comments you may have on the proposed rules and assessment criteria for management zone A and SP.</p>	<p>Assesment criteria complex.</p> <p>Ideally it will be well resourced and most importantly user-friendly when rolled out if realistic about delivering outcomes in specified time frame. There are countless floodworks that affect flows to assess throughout the management area which if properly done, will be a huge task.</p> <p>I notice some of Zone A (not just for this property) are irrigation channels, not actually tributaries.</p>
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Additional types of flood works are permitted within management zone A and SP if they were constructed prior to the commencement of the draft floodplain management plan, subject to complying with the standard assessment criteria.

For more information, please refer to section 4.1.1.2 and Table 2 in the [Report to assist public exhibition](#).

<p>Please provide any comments you may have on the proposed rules and assessment criteria for existing unapproved works in management zone A and SP.</p>	<p>The assesment criteria and rules for existing works need to be flexible and considered case by case rather than "subject to complying with the standard assessment criteria".</p> <p>For example; the majority of the floodworks on this property [REDACTED] were constructed 30 to 40+ years ago; a product of the property being situated within the [REDACTED] floodplain which is heavily impacted by flooding. Furthermore, their size and capacity are commensurate to what actually happens in this area.</p> <p>From experience, these floodworks overall do not negatively impact flow paths or extent of flooding in the area, nor threaten neighbours property yet could realistically have to be removed or reduced in their capacity. Evidence of how little impact they have on flowpaths and connectivity is illustrated in Map 4 (large flood 2022) and Map 5 (norma/smaller flood 2021). Note height and size of works most likely would not comply if "standard assesment" applied nor would they be workable.</p>
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Proposed rules and assessment criteria for management zone B

Any type of flood work will be permitted in management zone B, subject to assessment using the standard assessment criteria. Larger flood works in management zone B will require advertisement and assessment using the hydraulic assessment criteria.

There is no difference in the rules and assessment criteria for flood works constructed prior to or after the draft floodplain management plan commences.

For more information, please refer to section 4.1.2, 4.2 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for management zone B.	<p>The Zone mapping appears not to have fully taken into account land elevation, but rather relied in the footprint of prior (large) flood extent. The extent has been disorted by development and floodworks right up and down the river pushing water to higher elevated areas that historically would not or rarely recieve floodwater.</p> <p>This is evident particularly for areas classified as Zone B. (refer to map 6).</p> <p>Again, if assesment critereaa not fit for purpose and circumstance, it is unworkable.</p>
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Proposed rules and assessment criteria for management zone C and CU

Any type of flood work will be permitted in management zone C and CU, subject to assessment using the standard assessment criteria. Flood works that may have a significant impact on high value infrastructure will require assessment using the hydraulic assessment criteria.

There is no difference in the rules and assessment criteria for flood works constructed prior to or after the draft floodplain management plan commences.

For more information, please refer to section 4.1.2, 4.2 and Table 2 in the [Report to assist public exhibition](#).

<p>Please provide any comments you may have on the proposed rules and assessment criteria for management zone C and CU.</p>	<p>Above comments apply.</p>
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Proposed mandatory conditions

The draft floodplain management plan proposes three mandatory conditions that will apply to flood work approvals:

1. After a flood work is removed, the area it was located must be returned to the height of the natural surface of the ground.
2. Notice must be given to WaterNSW once a flood work is constructed.
3. Erosion must be prevented during the construction and use of a flood work.

For more information, please refer to section 5.3 in the [Report to assist public exhibition](#).

<p>Please provide any comments you may have on the proposed mandatory conditions.</p> <p><i>(If relevant please attach a map to your submission.)</i></p>	<p>OK if assesment correct in first instance.</p>
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Proposed amendment provisions

The draft floodplain management plan sets out the circumstances when the plan may be amended in the future. Of note, it proposes to amend the plan before 1 July 2028 to include rules and assessment criteria that consider the effects of climate change.

For more information, please refer to section 5.4 in the [Report to assist public exhibition](#).


<p>Please provide any comments you may have on the proposed amendment provisions.</p> <p><i>(If relevant please attach a map to your submission.)</i></p>	<p>Yes plan should be flexible enough for amendments in future. However, consideration of climate change effects will be subjective, not proven. Any amendments should be solely based on historical and the most current data available.</p>
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Additional information

<p>If you have any other comments on the draft floodplain management plan, please provide them here.</p> <p><i>(If relevant please attach a map to your submission.)</i></p>	<p>A "broadbrush" management approach will not align with what actually happens on the ground in specific areas. For example; flood behaviour upstream at Wagga is vastly different to what occurs on the Lowbidgee Floodplain below Maude. Equally, the floodworks in place (or required) need to be of the specifications which logically fit that situation. Under the proposed Plan's criteria and rules of floodworks, access to this property, protection of assets and delivery of water (both environmental and production) will be severely compromised.</p>
--	---

If you would like to provide any additional information to help us understand your feedback, please attach this to your submission.

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<p>How did you hear about this consultation? *</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Community group <input type="checkbox"/> Department's website <input type="checkbox"/> Email or newsletter from the department <input type="checkbox"/> Letter <input type="checkbox"/> Newspaper advertisement <input type="checkbox"/> Social media <input type="checkbox"/> Word of mouth <input type="checkbox"/> Other (please specify):
<p>Do you identify as Aboriginal and/or Torres Strait Islander? *</p>	

Do you speak a language other than English at home? *	<div><div></div><div></div><div></div><div></div></div>
Would you like to sign up to our monthly Water newsletter to stay informed and have your say about water planning, management and reform across NSW?	<div><input type="checkbox"/> Yes</div> <div><input type="checkbox"/> No</div> <div><input checked="" type="checkbox"/> I've already subscribed</div>

Thank you for taking the time to complete this form.

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1. take a screenshot of the relevant area/s displayed on the interactive spatial map
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Mandatory questions are indicated with an asterisk (*).

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Save or print the completed submission form and send it via:

Email: floodplain.planning@dpie.nsw.gov.au OR

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Water Group – NSW DCCEEW

PO Box 189

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Privacy questions

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☒ Yes

☐ No

If you are answering on behalf of an organisation, do you give permission for your organisation's name to be published? *

☒ Yes

☐ No

☐ Not applicable

Your details

Details	
1. Given name *	Michael
2. Family name *	Cattanach
3. Email address *	[REDACTED]
4. Address	[REDACTED]
5. Phone number	[REDACTED]
6. Are you making this submission as an individual or as a representative of an organisation? * (Mark only one)	<input type="checkbox"/> Individual (skip to question 9) <input type="checkbox"/> Organisation
7. Name of organisation	
8. Who do you represent? *	<input type="checkbox"/> Government <input type="checkbox"/> Peak representative organisation <input type="checkbox"/> Aboriginal organisation <input type="checkbox"/> Environmental organisation <input type="checkbox"/> Irrigation industry <input type="checkbox"/> Mining industry <input type="checkbox"/> Other (please specify):
9. Have you read the <u>Draft Murrumbidgee Valley Floodplain Management Plan – Report to assist Stage 2 public exhibition?</u> *	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
10. Did/will you attend any of the following in relation to the Murrumbidgee Valley Floodplain Management Plan?	<input type="checkbox"/> An individual appointment <input type="checkbox"/> A phone call with departmental staff <input type="checkbox"/> A group meeting with departmental staff <input checked="" type="checkbox"/> None of these

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Proposed management zones

The proposed management zones represent the hydraulic, ecological or Aboriginal cultural (or combination of) attributes of the land. Different rules and assessment criteria apply to each management zone. These reflect the nature of the area and consider the impact that a flood work may have on the movement of flood water, and risk to life and property.

For more information, please refer to Figure 3 and section 3 in the [Report to assist public exhibition](#). For a higher resolution version of the proposed management zones, see the [interactive spatial map](#).

<p>Please provide any comments you may have on the proposed management zones.</p> <p><i>(If relevant please attach a map to your submission.)</i></p>	<p>I would like to query the application of parts of the property of [REDACTED] as management zone A. There are areas noted on the floodplain management plan where they are defined as management zone A but are clearly management zone B given the experience of more recent floods during 2012 and 2016 where no floodwater came from the east of the property. I would like the opportunity to discuss in the future to ensure that appropriate zoning is put in place. A page attached to this email shows the specific area that has been incorrectly outlined as part of the management zone A.</p>
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Proposed rules and assessment criteria for management zone A and SP

Flood works in management zone A and SP will be restricted to specific types that are essential for the protection of life and property, or improvement of the floodplain. Each type of flood work permitted will be subject to size or height restrictions to minimise the impact on the passage of floodwater.

For more information, please refer to section 4.1.1 and Table 1 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the flood work types permitted within management zone A and SP and associated specifications.

All flood works in management zone A and SP will be assessed using the standard assessment criteria. Enhancement flood works will also be assessed using the hydraulic assessment criteria.

For more information, please refer to section 4.1.1 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for management zone A and SP.

Additional types of flood works are permitted within management zone A and SP if they were constructed prior to the commencement of the draft floodplain management plan, subject to complying with the standard assessment criteria.

For more information, please refer to section 4.1.1.2 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for existing unapproved works in management zone A and SP.

Proposed rules and assessment criteria for management zone B

Any type of flood work will be permitted in management zone B, subject to assessment using the standard assessment criteria. Larger flood works in management zone B will require advertisement and assessment using the hydraulic assessment criteria.

There is no difference in the rules and assessment criteria for flood works constructed prior to or after the draft floodplain management plan commences.

For more information, please refer to section 4.1.2, 4.2 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for management zone B.	
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Proposed rules and assessment criteria for management zone C and CU

Any type of flood work will be permitted in management zone C and CU, subject to assessment using the standard assessment criteria. Flood works that may have a significant impact on high value infrastructure will require assessment using the hydraulic assessment criteria.

There is no difference in the rules and assessment criteria for flood works constructed prior to or after the draft floodplain management plan commences.

For more information, please refer to section 4.1.2, 4.2 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for management zone C and CU.

Proposed mandatory conditions

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(If relevant please attach a map to your submission.)

Proposed amendment provisions

The draft floodplain management plan sets out the circumstances when the plan may be amended in the future. Of note, it proposes to amend the plan before 1 July 2028 to include rules and assessment criteria that consider the effects of climate change.

For more information, please refer to section 5.4 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed amendment provisions.

(If relevant please attach a map to your submission.)

Additional information

If you have any other comments on the draft floodplain management plan, please provide them here.

(If relevant please attach a map to your submission.)

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- ☐ Department's website
- ☐ Email or newsletter from the department
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- ☐ Newspaper advertisement
- ☐ Social media
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- ☐ Other (please specify):

Do you identify as Aboriginal and/or Torres Strait Islander? *



Do you speak a language other than English at home? *



Would you like to sign up to our monthly Water newsletter to stay informed and have your say about water planning, management and reform across NSW?

- ☒ Yes
- ☐ No
- ☐ I've already subscribed

Thank you for taking the time to complete this form.

Your form "Murrumbidgee Valley - Stage 2 Public Consultation Submissions" got a response

From Response Report [REDACTED]

Date Thu 26/09/2024 10:23 AM

To Water Floodplain Management Planning Mailbox <floodplain.planning@dpie.nsw.gov.au>

 1 attachments (62 KB)

Murrumbidgee Valley - Stage 2 Public Consultation Submissions 200678 260924 102341.pdf;

Your form "Murrumbidgee Valley - Stage 2 Public Consultation Submissions" has received the following response:

Submitted on: 26/09/24 10:23:41

Completion time: 1 hr. 3 min. 2 sec.

Introduction (1/5)

Q. Do you give permission for your name to be published with your submission?

R. No

Q. If you are answering on behalf of an organisation, do you give permission for your organisation's name to be published?

R. Yes

Your details (2/5)

Q. Given name

R. [REDACTED]

Q. Family name

R. [REDACTED]

Q. Email address

R. [REDACTED]

Q. Address

R. [REDACTED]

Q. Phone number

R. [REDACTED]

Submission details (3/5)

Q. Are you making this submission as an individual or as a representative of an organisation?

R. Individual

Q. Name of organisation

R.

Q. Who do you represent?

R.

Q. Have you read the Draft Murrumbidgee Valley Floodplain Management Plan – Report to assist Stage 2 public exhibition?

R. Yes

Q. Did/will you attend any of the following in relation to the Murrumbidgee Valley Floodplain Management Plan?

R. A group meeting with departmental staff

Q. Please provide any comments you may have on the proposed management zones.

R. these proposed management zones need to be re-assessed and re - categorized. as a substantial amount of productive farm land(including my own at [REDACTED]) is categorized in Zone B, is the opinion of myself and my neighbor's that these areas need to be categorized to zone C.

Q. Please provide any comments you may have on the flood work types permitted within management zone A and SP and associated specifications.

R.

Q. Please provide any comments you may have on the proposed rules and assessment criteria for management zone A and SP.

R.

Q. Please provide any comments you may have on the proposed rules and assessment criteria for existing unapproved works in management zone A and SP.

R.

Your submission (4/5)

Q. Please provide any comments you may have on the proposed rules and assessment criteria for management zone B.

R. the proposed rules and assessment criteria, needs to be heavily researched across the whole management plan area to evaluate the different dynamics of land within these zones. Hence my appeal for rezoning from B to C. I can also foresee time delays for business productivity due to assessment times/staffing etc within governing body departments. which will have adverse effects to these property owners on which this zoning lies.

Q. Please provide any comments you may have on the proposed rules and assessment criteria for management zone C and CU.

R.

Q. Please provide any comments you may have on the proposed mandatory conditions.

R.

Q. Please provide any comments you may have on the proposed amendment provisions.

R.

Additional information (5/5)

Q. If you have any other comments on the draft floodplain management plan, please provide them here.

R. As my submission is to appeal the zoning of my farm from currently zone B to Zone C, also that of the neighbours around me. During the 2012 flood(last significant flood) my farm located at [REDACTED] [REDACTED] was not impacted by river flooding, water on my farm came down the [REDACTED] then flowed back into the river. Our farms are to high for water to come in from the river.

Q. How did you hear about this consultation?

R. Word of mouth

Q. If other above, specify here

R.

Q. Do you identify as Aboriginal and/or Torres Strait Islander?

R. [REDACTED]

Q. Do you speak a language other than English at home?

R. [REDACTED]

Q. Would you like to sign up to our monthly Water newsletter to stay informed and have your say about water planning, management and reform across NSW?

R. Yes

27 September 2024
Our Ref: [REDACTED]

Murrumbidgee Valley FMP
Water Group - NSW DCCEEW
PO Box 189
Queanbeyan NSW 2620

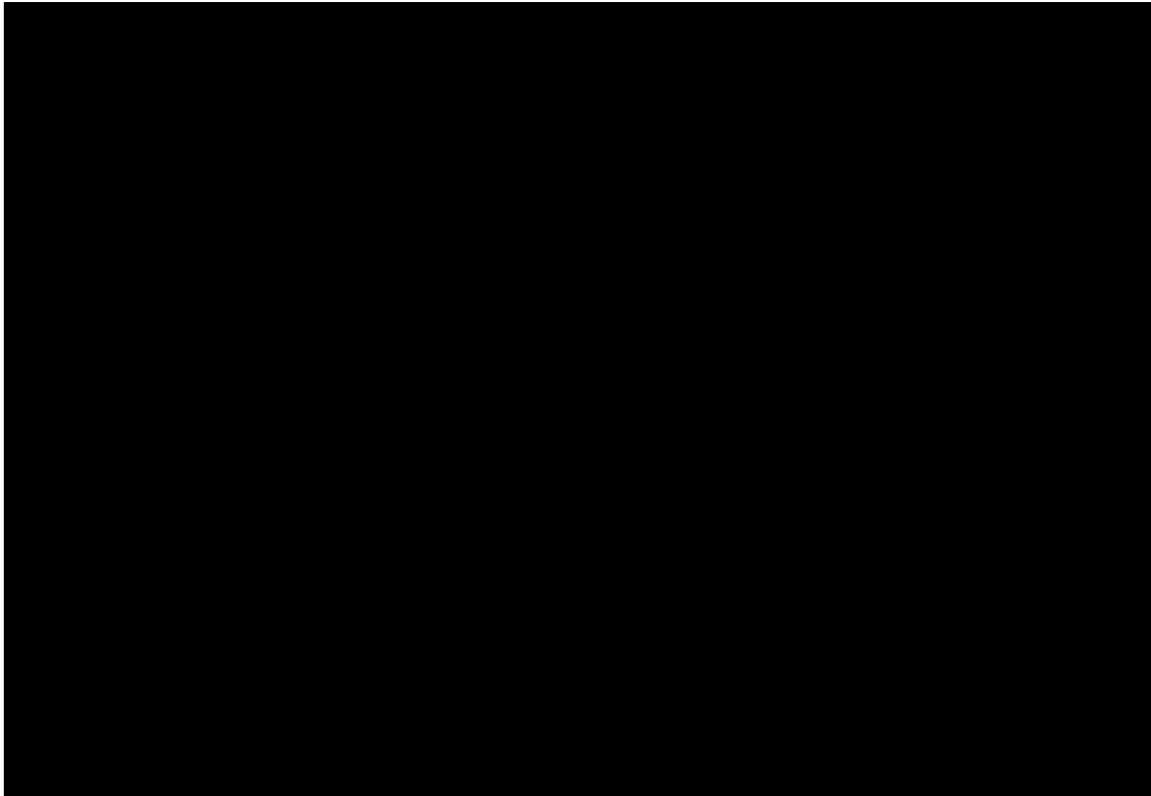
Murrumbidgee Valley FMP Feedback - Stage 2

1. Property Specific Feedback

a. Management Zone A

At the northern end of [REDACTED] the edge of Management Zone A overlaps with the existing supply channel, as shown in Figure 1. The existing channel is outside the high bank of [REDACTED] and should not be included in Zone A. The channel being in Zone A prevents it from being licenced in its current position.

Submission - Feedback Zone A should to be realigned with the high bank of the creek on the southern side of the existing channel.



The design flood flows used to derive the Draft FMP in the vicinity of [REDACTED] were obtained from WaterNSW. The design flood flows supplied are shown in Figure 2. The *Draft Murrumbidgee Valley Floodplain Management Plan, Report to assist Stage 1 public consultation*, outlines that the large design flood was typically based on the 2012 flood. This was stated as averaging around a 2% (1 in 50 year) AEP flood event over the floodplain and a 1.4% (1 in 71 year) AEP flood event at Darlington Point.

As shown in Figure 2, the flows supplied for the Murrumbidgee River from the DPIE model by WaterNSW for the large design flood are 1,659 m³/s. There have been several flood studies done for Darlington Point for the Murrumbidgee Council. The *Darlington Point Floodplain Risk Management Study and Draft Plan, September 2021* (Catchment Simulation Solutions) and the *Murrumbidgee River at Darlington Point and Environs Flood Study, Final Report, December 2018* (BMT WBM Pty Ltd) both indicate that the flow in the Murrumbidgee River in the 1% AEP and 2% flood events is around 1,400 m³/s and 1,200 m³/s respectively. The peak daily mean discharge at the Darlington Point gauge (Station No. 410021) in the 2012 flood was 1,224.9 m³/s.

The flow supplied is downstream of the Darlington Point Gauge and there are breakout flows to the north of the river between the gauge and the flow

supplied. The flow supplied for the Murrumbidgee River in the large design flood is at least 20% to 40% larger than the intended design flood magnitude and could be significantly larger again depending on the magnitude of the breakouts to the north.

Based on the supplied Lachlan River flow being significantly larger than the 2012 flood event we have assumed that the southern flow supplied (IDMBG2 - 387 m³/s on Figure 2) is also significantly larger than the 2012 flood flow.

Submission - The design flows for the large design flood immediately downstream of Darlington Point should be reduced to match the 2012 flood flows. The southern flow should be reduced by a similar percentage. It is unfair for one section of the floodplain to be assessed using significantly larger flows than is the intention of the floodplain management plan.

c. Hydraulic Assessment Criteria

The Murrumbidgee River floodplain has been developed for irrigation since the 1960's and 1970's. There are significant areas of irrigation that were developed before any floodplain management plans or guidelines on floodplain development were implemented.

The assessment criteria of limiting increases in flood levels on adjacent landholdings to less than 10cm in a 2% AEP flood does not reflect acceptable conditions on a floodplain that is largely already developed. Considering the extent and age of development the allowable depth increase on adjacent landholdings once in every 50 years should be 20cm as is the case in the Namoi River Floodplain Management Plan. A slightly larger tolerance in the allowable depth increase will significantly reduce the cost of compliance, both in terms of production area loss and construction costs without detrimental change to the natural flow distribution. The Namoi River Floodplain Management Plans have been in place since 2019 and there have been no noted consequences of having an allowable increase of 20cm. The Namoi plans were amended in 2024 and the allowable depth increases remain unchanged indicating that the plan is working on a floodplain that was largely developed when the plans were implemented.

Submission - The allowable depth increase on adjacent landholdings should be increased to 20cm in recognition of the history and extent of existing

development on the floodplain and the uncommon nature of the design flood events.

2. General Floodplain Management Plan Feedback

a. Management Zone A Ill Defined

The management zones are largely similar to the management zones used in the other recently developed FMP's in the northern valleys. The one exception is the removal of Zone A Ill Defined. There are many instances on the floodplain where there are defined areas of Zone A that pass through existing flood protected developments. The terrain within these developments has been landformed and the natural flow paths have been altered or no longer exist. The Zone A within the flood protected area should be changed to Zone A Ill Defined to give the landholder some flexibility in how they align their development to comply with the FMP (as opposed to a Zone A area dictating a flow alignment that no longer exists and where banks are no longer allowed). The Zone A is still defined upstream and downstream of the flood protected area which sets the inflow and exit points of the flow but having an area of Zone A Ill Defined within the flood protected area gives the landholder some flexibility in terms of a floodway alignment that still meets the connectivity and flow conditions.

Submission - Where a Zone A area in the Draft FMP flows through a flood protected area and the primary flow path becomes undefined the landholder

should have some flexibility in aligning a floodway through the developed area. This could be achieved by a relatively wide area of Zone A Ill Defined or some other mechanism.

b. Joint Flood Studies

Given the history and extent of development on the floodplain, many developments have been constructed in conjunction with each other to retain the flow distribution. That is, works on one property may have been constructed in order to work with or change a flow distribution on an adjacent property. It should be possible for adjacent landholdings to be able to obtain a flood work approval that encompasses all of the landholdings involved.

In the past it has been possible for adjacent landholders to obtain approval for works by undertaking a flood study for the combined works. As long as flow conditions into and exiting the total land unit conformed with the FMP the works were considered complying. This could now be a more formal arrangement with multiple approval holders (landholders) on the one approval. That way the approved works could not be changed without the agreement of all landholders involved.

Submission - Adjoining landholders should be able to obtain a joint Flood Work Approval where the total landholding is treated as one unit and the hydraulic assessment criteria apply to the landholdings adjacent to that unit for assessment against flow depth, velocity and distribution criteria. The types of works allowed in each management zone would still apply on all properties. The approval would be held in the names of all landholders and could not be changed without the agreement of all landholders.

Yours sincerely,

[Redacted signature block]



26 September 2024

Murrumbidgee Valley Floodplain Management Plan

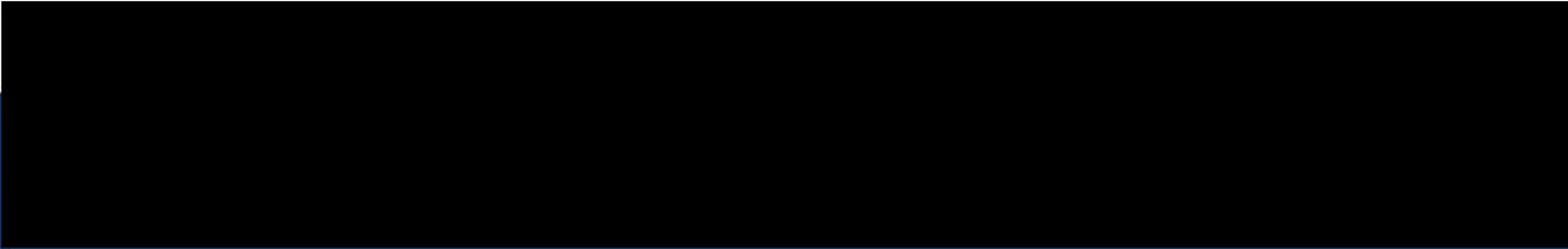
Water Group – NSW DCCEEW

E: floodplain.planning@dpie.nsw.gov.au

Dear Murrumbidgee Valley Floodplain Management Plan Team

submission to the Draft Murrumbidgee Valley Floodplain Management Plan Stage Two Consultation

Key points

- [REDACTED] owns and operates water supply infrastructure which is essential to the supply of surface water to our members and customers. This infrastructure crosses the proposed Murrumbidgee Floodplain Management Plan (the Plan) boundary. [REDACTED] is seeking regulatory certainty the making of the Plan will not negatively impact on [REDACTED] capacity to provide these essential water supply services to its members and customers, with customers including WaterNSW and environmental water holders.
 - [REDACTED] welcomes steps by the Department of Climate Change Energy the Environment and Water (the Department) to progress “flood work” approvals for our existing levees. These works are the only works identified in [REDACTED] original [REDACTED] as “flood works.”
 - [REDACTED] recommends the Plan includes a general exemption for existing [REDACTED] irrigation supply channels and drainage channels captured in [REDACTED] from requiring a flood work approval. This is essential to ensuring [REDACTED] can continue to provide its irrigation and drainage services to irrigators but also WaterNSW and environmental water holders.
 - [REDACTED] does not consider the flexibility provided for existing works in the draft Plan are satisfactory and contends these are not practical for a gravity irrigation supply, which includes above ground water supply infrastructure.
 - [REDACTED] acknowledges and supports the changes made to the proposed Plan floodplain boundary and believes these changes are consistent with [REDACTED] on ground experience of inundation.
 - [REDACTED] supports the proposed management zones.
 - [REDACTED] supports the modifications to the identified floodplain ecological assets.
 - [REDACTED] notes the purpose of its [REDACTED] is to authorise [REDACTED] to carry on the business of supplying water provided to it by the Ministerial Corporation and to exercise its functions under the *Water Management Act 2000 (NSW)*. To do so, [REDACTED] must be able to construct, maintain, manage and operate efficiently its infrastructure. It is important the Plan including the floodplain boundary does not impact on [REDACTED] capacity for proper maintenance of its earthen assets, including long term maintenance of its infrastructure to carry out licence requirements.
 - [REDACTED] supports the proposed mandatory conditions but does not believe the inclusion of an amendment of the Plan in 2028 to respond to climate change is warranted. Other opportunities to amend the plan will capture changed circumstances which may include changes associated with climate change.
- 

1. Introduction

█████ appreciates the opportunity to provide feedback to Department's Stage two public consultation on the Plan.

█████ submission to the Stage one consultation raised a number of issues which are material to █████ and its members. It also provided important historical information about █████ licencing arrangements. This background is not repeated in this submission but remains relevant to the finalisation of the Plan.

█████ welcomes the Department's action to progress the relevant approvals for █████ levees included in █████. These levees should have automatically transferred as flood work approvals, under the Water Management Act 2000, when the flood work approvals commenced in 2015.

2. Proposed Floodplain Boundary

█████ supports the proposed boundary for the Murrumbidgee Valley Floodplain and confirms the updated boundary reflects the extent of inundation experienced for the two design events, particularly the extent of inundation in the █████ area of operation.

3. Proposed floodway network management zones

█████ understands the logic associated with the five floodway management zones and supports the proposed zones.

█████ notes its main offtake infrastructure crosses management zones A, B and C and its drainage infrastructure discharging into the Yanco Creek also cross management zones A, B and C.

█████ primary concern with the proposed Plan is the regulatory uncertainty of the Plan on existing █████ existing supply and drainage infrastructure where it crosses the floodplain across zones A, B and C.

4. Proposed rules and assessment criteria

█████ acknowledges the proposed rules and assessment criteria for existing flood works are intended to provide a pathway for approval of works. █████ does not believe the proposed flexibility is adequate for existing "irrigation supply" infrastructure in gravity supplied systems.

█████ believes there is a fundamental problem with the Department's approach to existing works in particular approved "water supply works."

There is no clarity on whether the Department intends for existing irrigation supply channels captured in █████ original █████ and subsequently in its █████ to also have a flood work approval.

Furthermore, the proposed specific requirements for a supply channel (Clause 43 of the draft Plan) are not practical where the supply channel operates as a gravity irrigation supply channel.

This uncertainty needs to be resolved as a priority and in a way which will insure █████ approved works, and many other such approved works, can continue to operate as intended when constructed by the NSW Government.

█████ recommends the most efficient mechanism to address this uncertainty is for the Plan to provide a general exemption from requiring a flood work approval for irrigation supply and drainage infrastructure owned and operated by █████.

The justification is these works were previously owned and built by the NSW Government. [REDACTED] since privatisation from government has not enhanced or altered these works and continues to maintain and operate these works in accordance with our relevant approvals and Operating Licence.

5. Identified flood-dependent ecological assets

[REDACTED] welcomes the changes to the identified flood-dependent ecological assets, particularly as these assets overlap with [REDACTED] two key drainage lines into the Yanco Creek [REDACTED]. These modifications will assist [REDACTED] with routine maintenance of its drainage infrastructure.

[REDACTED] notes the flood dependent ecological assets overlap with [REDACTED] main canal and main offtake. It is important [REDACTED] can continue to conduct routine maintenance of its supply channel and offtake. [REDACTED] notes the purpose of its Operating Licence is to authorise [REDACTED] to carry on the business of supplying water provided to it by the Ministerial Corporation and to exercise its functions under the *Water Management Act 2000 (NSW)*, and to do so [REDACTED] must be able to construct, maintain, manage and operate efficiently its infrastructure. It is important the floodplain boundary does not impact on [REDACTED] capacity for proper maintenance of its earthen assets, including long term maintenance of its infrastructure to carry out licence requirements.

[REDACTED] also notes the overlap with the [REDACTED] and the flood dependent ecological assets. The [REDACTED] is essential to provide operational water to the Yanco Creek and also the supply of environmental water to the Yanco Creek. [REDACTED] needs to be able to continue to operate and maintain this infrastructure once the Plan is made.

[REDACTED] seeks clarification from the Department of any potential impact of overlap between these ecological assets and maintenance of [REDACTED] infrastructure.

6. Mandatory conditions

[REDACTED] supports the Plan having mandatory conditions for flood work decommissioning and for management of the flood works to minimise erosion and sediment release into the floodplain.

7. Amendment of the Floodplain Management Plan

[REDACTED] notes the draft Plan includes an extensive list of ways this plan can be amended. The Plan is expected to commence in 2025. It is to be reviewed by the Natural Resources Commission within the first five years (i.e. by 2030) and then reviewed by the Department between 2030 and 2035.

The draft Plan proposes before 1 July 2028 to add or modify provisions for the purpose of responding to climate change. [REDACTED] does not support including responding to climate change as a specific requirement.

Including this as a requirement within three years of the commencement of the Plan assumes or implies there is or will be certainty about the impact of climate change on the Plan within this time frame. It is [REDACTED] view the impacts of climate change are far from certain with quite wide-ranging options for potential future climates and therefore flooding.

The other mechanisms for amending the Plan included in Clause 78 of the draft Plan allow the impacts of changed conditions to be included in the Plan removing the need for a specific clause for climate change.

8. Concluding comments

████ looks forward to the regulatory uncertainty of our ██████████ being resolved as a priority before the Plan is gazetted.

If you require further information please contact █████ █████ █████ █████ █████
██

Yours sincerely

██

[Murrumbidgee Valley - Stage 2 Public Consultation Submissions](#)

Response ID: [200833](#)

Submitted Date: 26/09/24 17:44:46

Completion Time: 1 hr. 5 min. 10 sec.

Introduction (Page 1 /5)

We are seeking feedback on the [draft Murrumbidgee Valley Floodplain Management Plan](#) through Stage 2 public exhibition, including a formal submission process from 19 August until 29 September 2024.

Enquiries and assistance: floodplain.planning@dpie.nsw.gov.au

Please submit this form by **11.59pm (AEST) on 29 September 2024.**

How to fill out this form

The publication [Draft Murrumbidgee Valley Floodplain Management Plan – Report to assist Stage 2 public exhibition](#) provides information that can help you to complete this submission form.

To provide feedback on the management zones shown in Figure 3 in the report and on the [interactive spatial map](#), we recommend you:

1. take a screenshot of the relevant area/s displayed on the [interactive spatial map](#)
2. use a drawing tool to illustrate feedback or refer to the area shown in written feedback
3. save the screenshot of the map as an image file and attach it to your submission.

Important information about this form

You **cannot save a draft** of this form and access it later—you will need to create and **submit the form in one session.**

The fields marked with an asterisk * are mandatory and must be completed to submit the form.

After you have submitted your form, a copy of the submission will be sent to your email address.

If you have any questions about the submission form, please email: floodplain.planning@dpie.nsw.gov.au

Privacy and confidentiality

All submissions, including maps, received by the NSW Department of Climate Change, Energy, the Environment and Water will be reviewed and published. The department values your input and accepts that information you provide may be private and personal.

When publishing submissions, including maps, the department will make every effort to redact personal and identifying information (your name will be published if you provide us with permission to do so).

If you want your name to be treated as confidential, please indicate this by ticking the relevant box below.

Your information will be handled by the department in accordance with the [Privacy and Personal Information Protection Act 1998](#). Any personal information you provide in completing this form will only be used to inform the development of the Murrumbidgee Valley Floodplain Management Plan. We will not use or disclose the information for any other purpose, unless required or authorised to do so.

If you would like to know more about how the department meets its obligations in collecting, storing, using and sharing personal information, you can read our complete [Privacy Policy or Privacy Management Plan](#).

If you wish to view or amend the information held by us, you can email us at floodplain.planning@dpie.nsw.gov.au, or contact the department's privacy officer on 02 9860 1440 or at privacy.dcceew@environment.nsw.gov.au.

Permission

Do you give permission for your name to be published with your submission?

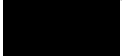
No

If you are answering on behalf of an organisation, do you give permission for your organisation's name to be published?

No

Your details (Page 2 /5)

Given name



Family name

[REDACTED]
Email address
[REDACTED]

Address
[REDACTED]

Phone number
[REDACTED]

Submission details (Page 3 /5)

Are you making this submission as an individual or as a representative of an organisation?

Individual

Have you read the Draft Murrumbidgee Valley Floodplain Management Plan – Report to assist Stage 2 public exhibition?

Yes

Did/will you attend any of the following in relation to the Murrumbidgee Valley Floodplain Management Plan?

None of these

The following sections relate to the feedback we are seeking on the draft floodplain management plan as described in the Report to assist public exhibition. Follow the steps on page 1 to provide feedback on the management zones shown in Figure 3 in the [Report to assist public exhibition](#).

The proposed management zones represent the hydraulic, ecological or Aboriginal cultural (or combination of) attributes of the land. Different rules and assessment criteria apply to each management zone. These reflect the nature of the area and consider the impact that a flood work may have on the movement of flood water, and risk to life and property.

For more information, please refer to Figure 3 and section 3 in the [Report to assist public exhibition](#). For a higher resolution version of the proposed management zones, see the [interactive spatial map](#).

Please provide any comments you may have on the proposed management zones.

Objections to falling into Zone B classification for farm [REDACTED] # In 2012 imagery of our farm would have shown up large areas of water. This is due to paddocks being flooded under rice. This was exacerbated due to [REDACTED] drainage system being unable to cope with over 300 mm of rain falling in a 24 hour period. # At that same period [REDACTED] failed resulting in excess water entering [REDACTED] This resulted in overflows in the supply system that runs through our farm. # [REDACTED] road which is on our Eastern boundary. This structure drains a large area [REDACTED] and the farms in between. The drain couldn't handle the 300 mm of rain over such a large area in such a small timeframe. The water was able to flow through pipes we have [REDACTED] we have used for irrigating in the past. This added to the flooding. # Flood was due to freak rain event not the river.

If relevant please attach a map to your submission.

Flood works in management zone A and SP will be restricted to specific types that are essential for the protection of life and property, or improvement of the floodplain. Each type of flood work permitted will be subject to size or height restrictions to minimise the impact on the passage of floodwater.

For more information, please refer to section 4.1.1 and Table 1 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the flood work types permitted within management zone A and SP and associated specifications.

All flood works in management zone A and SP will be assessed using the standard assessment criteria. Enhancement flood works will also be assessed using the hydraulic assessment criteria.

For more information, please refer to section 4.1.1 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for management zone A and SP.

Additional types of flood works are permitted within management zone A and SP if they were constructed prior to the commencement of the draft floodplain management plan, subject to complying with the standard assessment criteria.

For more information, please refer to section 4.1.1.2 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for existing unapproved works in management zone A and SP.

Your submission (Page 4 /5)

Any type of flood work will be permitted in management zone B, subject to assessment using the standard assessment criteria. Larger flood works in management zone B will require advertisement and assessment using the hydraulic assessment criteria.

There is no difference in the rules and assessment criteria for flood works constructed prior to or after the draft floodplain management plan commences.

For more information, please refer to section 4.1.2, 4.2 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for management zone B.

Banks that can't be above 40 cm will limit what crops can be grown.

Any type of flood work will be permitted in management zone C and CU, subject to assessment using the standard assessment criteria. Flood works that may have a significant impact on high value infrastructure will require assessment using the hydraulic assessment criteria.

There is no difference in the rules and assessment criteria for flood works constructed prior to

or after the draft floodplain management plan commences.

For more information, please refer to section 4.1.2, 4.2 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for management zone C and CU.

The draft floodplain management plan proposes three mandatory conditions that will apply to flood work approvals:

1. After a flood work is removed, the area it was located must be returned to the height of the natural surface of the ground.
2. Notice must be given to WaterNSW once a flood work is constructed.
3. Erosion must be prevented during the construction and use of a flood work.

For more information, please refer to section 5.3 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed mandatory conditions.

Earth works are necessary on an irrigation farm.

If relevant please attach a map to your submission.

The draft floodplain management plan sets out the circumstances when the plan may be amended in the future. Of note, it proposes to amend the plan before 1 July 2028 to include rules and assessment criteria that consider the effects of climate change.

For more information, please refer to section 5.4 in the Report to assist public exhibition.

Please provide any comments you may have on the proposed amendment provisions.

Will there be consultation, I have only just heard about zoning and the adverse effects it will have if it goes through.

If relevant please attach a map to your submission.

Additional information (Page 5 /5)

If you have any other comments on the draft floodplain management plan, please provide them here.

This needs to be reevaluated as river flooding hasn't been an issue. Imagery of freak weather events such as 2012 need to be scrutinized.

If relevant please attach a map to your submission.

The following questions help us understand how effective our communication and engagement activities are in reaching our diverse community and stakeholders. This enables us to communicate more clearly and improve opportunities for everybody to have their say.

How did you hear about this consultation?

Word of mouth

If other above, specify here

Do you identify as Aboriginal and/or Torres Strait Islander?

[REDACTED]

Do you speak a language other than English at home?

[REDACTED]

Would you like to sign up to our monthly Water newsletter to stay informed and have your say about water planning, management and reform across NSW?

Yes

File List (Protected)

Screenshot 2024-09-26

[REDACTED]

[REDACTED]

Submission form for the draft Murrumbidgee Valley Floodplain Management Plan: Stage 2 public exhibition

How to fill out this form

The NSW Department of Climate Change, Energy, the Environment and Water is seeking your feedback on the draft Murrumbidgee Valley Floodplain Management Plan.

We are seeking feedback through a public exhibition process from Monday 19 August to Sunday 29 September 2024. The publication *Draft Murrumbidgee Valley Floodplain Management Plan – Report to assist Stage 2 public exhibition* provides information that can help you to complete this submission form. This report is available on the department's website at:

water.nsw.gov.au/murrumbidgee-floodplain-management-plan

To provide feedback on the management zones shown in Figure 3 in the report and on the [interactive spatial map](#), we recommend you:

1. take a screenshot of the relevant area/s displayed on the interactive spatial map
2. use a drawing tool to illustrate feedback or refer to the area shown in written feedback
3. save the screenshot of the map as an image file and attach it to your submission.

Mandatory questions are indicated with an asterisk (*).

How to submit your feedback

Have your say by Sunday 29 September 2024.

Save or print the completed submission form and send it via:

Email: floodplain.planning@dpie.nsw.gov.au OR

Post: Murrumbidgee Valley FMP

Water Group – NSW DCCEEW

PO Box 189

Queanbeyan NSW 2620

Information on privacy and confidentiality

All submissions, including maps, received by the NSW Department of Climate Change, Energy, the Environment and Water will be reviewed and published. The department values your input and accepts that information you provide may be private and personal.

When publishing submissions, including maps, the department will make every effort to redact personal and identifying information (your name will be published if you provide us with permission to do so).

If you want your name to be treated as confidential, please indicate this by ticking the relevant box below.

Your information will be handled by the department in accordance with the [Privacy and Personal Information Protection Act 1998](#). Any personal information you provide in completing this form will only be used to inform the development of the Murrumbidgee Valley Floodplain Management Plan. We will not use or disclose the information for any other purpose, unless required or authorised to do so.

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If you wish to view or amend the information held by us, you can email us at floodplain.planning@dpie.nsw.gov.au, or contact the department's Information Access and Privacy Unit on 02 9860 1440 or at privacy.dcceew@environment.nsw.gov.au.

Privacy questions

Do you give permission for your name to be published with your submission? *

☒ Yes

☐ No

If you are answering on behalf of an organisation, do you give permission for your organisation's name to be published? *

☒ Yes

☐ No

☐ Not applicable

Your details

Details	
1. Given name *	Michael
2. Family name *	Betar
3. Email address *	
4. Address	
5. Phone number	
6. Are you making this submission as an individual or as a representative of an organisation? * (Mark only one)	<input type="checkbox"/> Individual (skip to question 9) <input checked="" type="checkbox"/> Organisation
7. Name of organisation	Water View Pastoral Co Pty Ltd
8. Who do you represent? *	<input type="checkbox"/> Government <input type="checkbox"/> Peak representative organisation <input type="checkbox"/> Aboriginal organisation <input type="checkbox"/> Environmental organisation <input type="checkbox"/> Irrigation industry <input type="checkbox"/> Mining industry <input type="checkbox"/> Other (please specify):
9. Have you read the <u>Draft Murrumbidgee Valley Floodplain Management Plan – Report to assist Stage 2 public exhibition?</u> *	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
10. Did/will you attend any of the following in relation to the Murrumbidgee Valley Floodplain Management Plan?	<input type="checkbox"/> An individual appointment <input type="checkbox"/> A phone call with departmental staff <input type="checkbox"/> A group meeting with departmental staff <input checked="" type="checkbox"/> None of these

The following sections relate to the feedback we are seeking on the draft floodplain management plan as described in the Report to assist public exhibition. Follow the steps on page 1 to provide feedback on the management zones shown in Figure 3.

Proposed management zones

The proposed management zones represent the hydraulic, ecological or Aboriginal cultural (or combination of) attributes of the land. Different rules and assessment criteria apply to each management zone. These reflect the nature of the area and consider the impact that a flood work may have on the movement of flood water, and risk to life and property.

For more information, please refer to Figure 3 and section 3 in the [Report to assist public exhibition](#). For a higher resolution version of the proposed management zones, see the [interactive spatial map](#).

<p>Please provide any comments you may have on the proposed management zones.</p> <p><i>(If relevant please attach a map to your submission.)</i></p>	<p>Water View Pastoral Co Pty Ltd has an existing cattle feedlot that is currently in the process of further design development for submission of a Development Application with Leeton Shire Council. A Flood Survey, Flood Level Assessment, Soils and Water Quality Report and a Statement of Environmental Effects is currently being prepared by [REDACTED] and [REDACTED] at considerable expense. We request that no management zones be applied to the Water View Pastoral Co Pty Ltd property [REDACTED] without further consultation with Michael Betar from Water View Pastoral Co Pty Ltd and a review of the impending Flood Survey, Flood Level Assessment, Soils and Water Quality Report and Statement of Environmental Effects.</p>
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Proposed rules and assessment criteria for management zone A and SP

Flood works in management zone A and SP will be restricted to specific types that are essential for the protection of life and property, or improvement of the floodplain. Each type of flood work permitted will be subject to size or height restrictions to minimise the impact on the passage of floodwater.

For more information, please refer to section 4.1.1 and Table 1 in the [Report to assist public exhibition](#).

<p>Please provide any comments you may have on the flood work types permitted within management zone A and SP and associated specifications.</p>	<p>Water View Pastoral Co Pty Ltd has an existing cattle feedlot that is currently in the process of further design development for submission of a Development Application with Leeton Shire Council. A Flood Survey, Flood Level Assessment, Soils and Water Quality Report and a Statement of Environmental Effects is currently being prepared by [REDACTED] at considerable expense. We request that no management zones be applied to the Water View Pastoral Co Pty Ltd property [REDACTED] without further consultation with Michael Betar from Water View Pastoral Co Pty Ltd and a review of the impending Flood Survey, Flood Level Assessment, Soils and Water Quality Report and Statement of Environmental Effects.</p>
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All flood works in management zone A and SP will be assessed using the standard assessment criteria. Enhancement flood works will also be assessed using the hydraulic assessment criteria.

For more information, please refer to section 4.1.1 and Table 2 in the [Report to assist public exhibition](#).

<p>Please provide any comments you may have on the proposed rules and assessment criteria for management zone A and SP.</p>	<p>Water View Pastoral Co Pty Ltd has an existing cattle feedlot that is currently in the process of further design development for submission of a Development Application with Leeton Shire Council. A Flood Survey, Flood Level Assessment, Soils and Water Quality Report and a Statement of Environmental Effects is currently being prepared by [REDACTED] at considerable expense. We request that no management zones be applied to the Water View Pastoral Co Pty Ltd property [REDACTED] without further consultation with Michael Betar from Water View Pastoral Co Pty Ltd and a review of the impending Flood Survey, Flood Level Assessment, Soils and Water Quality Report and Statement of Environmental Effects.</p>
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Additional types of flood works are permitted within management zone A and SP if they were constructed prior to the commencement of the draft floodplain management plan, subject to complying with the standard assessment criteria.

For more information, please refer to section 4.1.1.2 and Table 2 in the [Report to assist public exhibition](#).

<p>Please provide any comments you may have on the proposed rules and assessment criteria for existing unapproved works in management zone A and SP.</p>	<p>Waterview Pastoral Pty Ltd has an existing cattle feedlot that is currently in the process of further design development for submission of a Development Application with Leeton Shire Council. A Flood Survey, Flood Level Assessment, Soils and Water Quality Report and a Statement of Environmental Effects is currently being prepared by [REDACTED] at considerable expense. We request that no management zones be applied to the Waterview Pastoral property [REDACTED] without further consultation with Michael Betar from Waterview Pastoral and a review of the impending Flood Survey, Flood Level Assessment, Soils and Water Quality Report and Statement of Environmental Effects.</p>
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Proposed rules and assessment criteria for management zone B

Any type of flood work will be permitted in management zone B, subject to assessment using the standard assessment criteria. Larger flood works in management zone B will require advertisement and assessment using the hydraulic assessment criteria.

There is no difference in the rules and assessment criteria for flood works constructed prior to or after the draft floodplain management plan commences.

For more information, please refer to section 4.1.2, 4.2 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for management zone B.	Water View Pastoral Co Pty Ltd has an existing cattle feedlot that is currently in the process of further design development for submission of a Development Application with Leeton Shire Council. A Flood Survey, Flood Level Assessment, Soils and Water Quality Report and a Statement of Environmental Effects is currently being prepared by [REDACTED] at considerable expense. We request that no management zones be applied to the Water View Pastoral Co Pty Ltd property [REDACTED] without further consultation with Michael Betar from Waterview Pastoral and a review of the impending Flood Survey, Flood Level Assessment, Soils and Water Quality Report and Statement of Environmental Effects.
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Proposed rules and assessment criteria for management zone C and CU

Any type of flood work will be permitted in management zone C and CU, subject to assessment using the standard assessment criteria. Flood works that may have a significant impact on high value infrastructure will require assessment using the hydraulic assessment criteria.

There is no difference in the rules and assessment criteria for flood works constructed prior to or after the draft floodplain management plan commences.

For more information, please refer to section 4.1.2, 4.2 and Table 2 in the [Report to assist public exhibition](#).

<p>Please provide any comments you may have on the proposed rules and assessment criteria for management zone C and CU.</p>	<p>Waterview Pastoral Pty Ltd has an existing cattle feedlot that is currently in the process of further design development for submission of a Development Application with Leeton Shire Council. A Flood Survey, Flood Level Assessment, Soils and Water Quality Report and a Statement of Environmental Effects is currently being prepared by [REDACTED] at considerable expense. We request that no management zones be applied to the Waterview Pastoral property [REDACTED] without further consultation with Michael Betar from Waterview Pastoral and a review of the impending Flood Survey, Flood Level Assessment, Soils and Water Quality Report and Statement of Environmental Effects.</p>
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Proposed mandatory conditions

The draft floodplain management plan proposes three mandatory conditions that will apply to flood work approvals:

1. After a flood work is removed, the area it was located must be returned to the height of the natural surface of the ground.
2. Notice must be given to WaterNSW once a flood work is constructed.
3. Erosion must be prevented during the construction and use of a flood work.

For more information, please refer to section 5.3 in the [Report to assist public exhibition](#).

<p>Please provide any comments you may have on the proposed mandatory conditions.</p> <p><i>(If relevant please attach a map to your submission.)</i></p>	<p>Water View Pastoral Co Pty Ltd has an existing cattle feedlot that is currently in the process of further design development for submission of a Development Application with Leeton Shire Council. A Flood Survey, Flood Level Assessment, Soils and Water Quality Report and a Statement of Environmental Effects is currently being prepared by [REDACTED] at considerable expense. We request that no management zones be applied to the Water View Pastoral Co Pty Ltd property [REDACTED] without further consultation with Michael Betar from Water View Pastoral Co Pty Ltd and a review of the impending Flood Survey, Flood Level Assessment, Soils and Water Quality Report and Statement of Environmental Effects.</p>
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Proposed amendment provisions

The draft floodplain management plan sets out the circumstances when the plan may be amended in the future. Of note, it proposes to amend the plan before 1 July 2028 to include rules and assessment criteria that consider the effects of climate change.

For more information, please refer to section 5.4 in the [Report to assist public exhibition](#).

<p>Please provide any comments you may have on the proposed amendment provisions.</p> <p><i>(If relevant please attach a map to your submission.)</i></p>	<p>Water View Pastoral Co Pty Ltd has an existing cattle feedlot that is currently in the process of further design development for submission of a Development Application with Leeton Shire Council. A Flood Survey, Flood Level Assessment, Soils and Water Quality Report and a Statement of Environmental Effects is currently being prepared by [REDACTED] at considerable expense. We request that no management zones be applied to the Waterview Pastoral property [REDACTED] without further consultation with Michael Betar from Water View Pastoral Co Pty Ltd and a review of the impending Flood Survey, Flood Level Assessment, Soils and Water Quality Report and Statement of Environmental Effects.</p>
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Additional information

<p>If you have any other comments on the draft floodplain management plan, please provide them here.</p> <p><i>(If relevant please attach a map to your submission.)</i></p>	<p>Water View Pastoral Co Pty Ltd would be prepared to share the findings of Flood Survey, Flood Level Assessment, Soils and Water Quality Report and the Statement of Environmental Effects once received by commissioned service providers.</p>
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If you would like to provide any additional information to help us understand your feedback, please attach this to your submission.

The following questions help us understand how effective our communication and engagement activities are in reaching our diverse community and stakeholders. This enables us to communicate more clearly and improve opportunities for everybody to have their say.

<p>How did you hear about this consultation? *</p>	<p> <input type="checkbox"/> Community group <input type="checkbox"/> Department's website <input type="checkbox"/> Email or newsletter from the department <input type="checkbox"/> Letter <input type="checkbox"/> Newspaper advertisement <input type="checkbox"/> Social media <input type="checkbox"/> Word of mouth <input type="checkbox"/> Other (please specify): </p>
<p>Do you identify as Aboriginal and/or Torres Strait Islander? *</p>	<p>[REDACTED]</p>

Do you speak a language other than English at home? *	<div></div>
Would you like to sign up to our monthly Water newsletter to stay informed and have your say about water planning, management and reform across NSW?	<div><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> I've already subscribed</div>

Thank you for taking the time to complete this form.

Submission form for the draft Murrumbidgee Valley Floodplain Management Plan: Stage 2 public exhibition

How to fill out this form

The NSW Department of Climate Change, Energy, the Environment and Water is seeking your feedback on the draft Murrumbidgee Valley Floodplain Management Plan.

We are seeking feedback through a public exhibition process from Monday 19 August to Sunday 29 September 2024. The publication *Draft Murrumbidgee Valley Floodplain Management Plan – Report to assist Stage 2 public exhibition* provides information that can help you to complete this submission form. This report is available on the department's website at:

water.nsw.gov.au/murrumbidgee-floodplain-management-plan

To provide feedback on the management zones shown in Figure 3 in the report and on the [interactive spatial map](#), we recommend you:

1. take a screenshot of the relevant area/s displayed on the interactive spatial map
2. use a drawing tool to illustrate feedback or refer to the area shown in written feedback
3. save the screenshot of the map as an image file and attach it to your submission.

Mandatory questions are indicated with an asterisk (*).

How to submit your feedback

Have your say by Sunday 29 September 2024.

Save or print the completed submission form and send it via:

Email: floodplain.planning@dpie.nsw.gov.au OR

Post: Murrumbidgee Valley FMP

Water Group – NSW DCCEEW

PO Box 189

Queanbeyan NSW 2620

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When publishing submissions, including maps, the department will make every effort to redact personal and identifying information (your name will be published if you provide us with permission to do so).

If you want your name to be treated as confidential, please indicate this by ticking the relevant box below.

Your information will be handled by the department in accordance with the [Privacy and Personal Information Protection Act 1998](#). Any personal information you provide in completing this form will only be used to inform the development of the Murrumbidgee Valley Floodplain Management Plan. We will not use or disclose the information for any other purpose, unless required or authorised to do so.

If you would like to know more about how the department meets its obligations in collecting, storing, using and sharing personal information, you can read our [Privacy statement](#) or [Privacy Management Plan](#).

If you wish to view or amend the information held by us, you can email us at floodplain.planning@dpie.nsw.gov.au, or contact the department's Information Access and Privacy Unit on 02 9860 1440 or at privacy.dcceew@environment.nsw.gov.au.

Privacy questions

Do you give permission for your name to be published with your submission? *

☒ Yes

☐ No

If you are answering on behalf of an organisation, do you give permission for your organisation's name to be published? *

☐ Yes

☐ No

☒ Not applicable

Your details

Details	
1. Given name *	John and Michelle
2. Family name *	Houghton
3. Email address *	
4. Address	
5. Phone number	
6. Are you making this submission as an individual or as a representative of an organisation? * (Mark only one)	<input checked="" type="checkbox"/> Individual (skip to question 9) <input type="checkbox"/> Organisation
7. Name of organisation	
8. Who do you represent? *	<input type="checkbox"/> Government <input type="checkbox"/> Peak representative organisation <input type="checkbox"/> Aboriginal organisation <input type="checkbox"/> Environmental organisation <input type="checkbox"/> Irrigation industry <input type="checkbox"/> Mining industry <input type="checkbox"/> Other (please specify):
9. Have you read the <u>Draft Murrumbidgee Valley Floodplain Management Plan – Report to assist Stage 2 public exhibition?</u> *	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
10. Did/will you attend any of the following in relation to the Murrumbidgee Valley Floodplain Management Plan?	<input checked="" type="checkbox"/> An individual appointment <input type="checkbox"/> A phone call with departmental staff <input type="checkbox"/> A group meeting with departmental staff <input type="checkbox"/> None of these

The following sections relate to the feedback we are seeking on the draft floodplain management plan as described in the Report to assist public exhibition. Follow the steps on page 1 to provide feedback on the management zones shown in Figure 3.

Proposed management zones

The proposed management zones represent the hydraulic, ecological or Aboriginal cultural (or combination of) attributes of the land. Different rules and assessment criteria apply to each management zone. These reflect the nature of the area and consider the impact that a flood work may have on the movement of flood water, and risk to life and property.

For more information, please refer to Figure 3 and section 3 in the [Report to assist public exhibition](#). For a higher resolution version of the proposed management zones, see the [interactive spatial map](#).

<p>Please provide any comments you may have on the proposed management zones.</p> <p><i>(If relevant please attach a map to your submission.)</i></p>	<p>Our objections to this modelling and classification of Zone B for properties [REDACTED]</p> <p>a) In 2012 our farm had permanent rice water applied to our paddocks and therefore the imagery would show that there was water on our paddocks, however this was from irrigation activities not from floodwater</p> <p>b) In 2012 a [REDACTED] structure failed at [REDACTED] on the main channel at Yanco causing water to come down the [REDACTED] channel system and onto our property. This water then flowed through our farm and drained back into the river while the river was in flood</p> <p>c) The Decision Tree pathway for classification of Zone C accurately reflects both of the properties listed above not the Zone B pathway</p> <p>d) Our property [REDACTED] has never been inundated by flood water from the Murrumbidgee River in any flood event since our family has been farming this property since 1928.</p> <p>e) We would propose to amend the zoning of the area on [REDACTED] from the junction of [REDACTED] through to the junction of [REDACTED] through to [REDACTED] from Zone B to Zone C.</p> <p>f) On the integrated map you have our properties listed at 143m above sea level, and the properties further south on [REDACTED] below [REDACTED] at a height of 156m. These properties are all receive irrigation water via the same gravity fed irrigation channel, if your heights above sea level are correct than this would be an impossibility as the water in the irrigation channel would have to run up hill. There is actually a 3-4 meter drop from my property to these properties on [REDACTED]. These heights need to be reviewed to enable an accurate assessment of the areas that could be inundated by water during a flood event.</p>
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Proposed rules and assessment criteria for management zone A and SP

Flood works in management zone A and SP will be restricted to specific types that are essential for the protection of life and property, or improvement of the floodplain. Each type of flood work permitted will be subject to size or height restrictions to minimise the impact on the passage of floodwater.

For more information, please refer to section 4.1.1 and Table 1 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the flood work types permitted within management zone A and SP and associated specifications.	No objections
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All flood works in management zone A and SP will be assessed using the standard assessment criteria. Enhancement flood works will also be assessed using the hydraulic assessment criteria.

For more information, please refer to section 4.1.1 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for management zone A and SP.	<p>Noted Table 1 Zone A is allowed a primary access road to provide basic provisions to access property or evacuate during a major flood event by permitting higher level road that directly service homes of no greater than 50cm, which is an extra 20cm on the normal allowance for flood works (currently 30cm) for that Zone. There is no consideration in Zone B for an extra allowance for direct access or to evacuate during a major flood event.</p> <p>Noted in Table 2 that in Zone A you are not required to advertise a flood work if you build a direct access road to your property that is 50cm but you do need to advertise flood work in Zone B if you build a road 40cm above the natural surface level.</p> <p>Noted in Table 2 for flood work, advertisement is only required in Zone B, and not in Zones A,C,CU and SP and when this statement is cross referenced back to Table 1, landholders in Zone A may assume that they can build a road, call it a direct access road to their house or an evacuation access road to the height of 50cm and not have to apply or advertise it under the flood works advertisement criteria as outlined in Table 2 theme 1</p>
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Additional types of flood works are permitted within management zone A and SP if they were constructed prior to the commencement of the draft floodplain management plan, subject to complying with the standard assessment criteria.

For more information, please refer to section 4.1.1.2 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for existing unapproved works in management zone A and SP.	No objections to the proposed rules and assessment criteria for existing unapproved works in Management Zone A and SP
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Proposed rules and assessment criteria for management zone B

Any type of flood work will be permitted in management zone B, subject to assessment using the standard assessment criteria. Larger flood works in management zone B will require advertisement and assessment using the hydraulic assessment criteria.

There is no difference in the rules and assessment criteria for flood works constructed prior to or after the draft floodplain management plan commences.

For more information, please refer to section 4.1.2, 4.2 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for management zone B.	In Zone B there is no special allowance given for landholders to build a direct access road or evacuation road on their property to use in the event of a major flood, however there is a special allowance given to those landholders in Zone A. Lets assume that the model map of river flood inundation is correct then how are those landholders currently residing in Zones B going to safely evacuate if the allowable height of roads is only 40cm Zone A has a maximum height of 50 cm for primary access roads which is 20cm above the allowable flood work height of 30cm, this allowance should be in both Zones A and B.
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Proposed rules and assessment criteria for management zone C and CU

Any type of flood work will be permitted in management zone C and CU, subject to assessment using the standard assessment criteria. Flood works that may have a significant impact on high value infrastructure will require assessment using the hydraulic assessment criteria.

There is no difference in the rules and assessment criteria for flood works constructed prior to or after the draft floodplain management plan commences.

For more information, please refer to section 4.1.2, 4.2 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for management zone C and CU.

No objections to the proposed rules and assessment criteria for Zone C

Proposed mandatory conditions

The draft floodplain management plan proposes three mandatory conditions that will apply to flood work approvals:

1. After a flood work is removed, the area it was located must be returned to the height of the natural surface of the ground.
2. Notice must be given to WaterNSW once a flood work is constructed.
3. Erosion must be prevented during the construction and use of a flood work.

For more information, please refer to section 5.3 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed mandatory conditions.
(If relevant please attach a map to your submission.)

If a landholder would like to remove a decommissioned flood work they are required to restore the area around it to the height of the natural surface, old infrastructure may remain in place if the landholder deems that it is too expensive to apply to decommission the flood work and then restore the area to its natural height. There is no incentive to remove it especially if the landholder inherited the decommissioned flood work from a previous land holder.

Proposed amendment provisions

The draft floodplain management plan sets out the circumstances when the plan may be amended in the future. Of note, it proposes to amend the plan before 1 July 2028 to include rules and assessment criteria that consider the effects of climate change.

For more information, please refer to section 5.4 in the [Report to assist public exhibition](#).

<p>Please provide any comments you may have on the proposed amendment provisions.</p> <p><i>(If relevant please attach a map to your submission.)</i></p>	<p>If there is a future amendment made to the plan that may impact on existing flood work approval holders or landholders within the that area, how will they be contacted or advised of the change? Will it be a general public consultation period or will the landholders be directly contacted or advised about the change directly and how long will the consultation period last.</p>
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Additional information

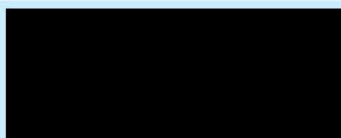
<p>If you have any other comments on the draft floodplain management plan, please provide them here.</p> <p><i>(If relevant please attach a map to your submission.)</i></p>	<p>Our property [REDACTED] have never been inundated by flood water from the Murrumbidgee River in any flood event since our family has been farming this property since 1928.</p>
--	--

If you would like to provide any additional information to help us understand your feedback, please attach this to your submission.

The following questions help us understand how effective our communication and engagement activities are in reaching our diverse community and stakeholders. This enables us to communicate more clearly and improve opportunities for everybody to have their say.

<p>How did you hear about this consultation? *</p>	<p><input type="checkbox"/> Community group</p> <p><input type="checkbox"/> Department's website</p> <p><input type="checkbox"/> Email or newsletter from the department</p> <p><input type="checkbox"/> Letter</p> <p><input type="checkbox"/> Newspaper advertisement</p> <p><input type="checkbox"/> Social media</p> <p><input type="checkbox"/> Word of mouth</p> <p><input type="checkbox"/> Other (please specify):</p>
<p>Do you identify as Aboriginal and/or Torres Strait Islander? *</p>	<p>[REDACTED]</p>

Do you speak a language other than English at home? *



Would you like to sign up to our monthly Water newsletter to stay informed and have your say about water planning, management and reform across NSW?

- ☒ Yes
- ☐ No
- ☐ I've already subscribed

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Submission form for the draft Murrumbidgee Valley Floodplain Management Plan: Stage 2 public exhibition

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water.nsw.gov.au/murrumbidgee-floodplain-management-plan

To provide feedback on the management zones shown in Figure 3 in the report and on the [interactive spatial map](#), we recommend you:

1. take a screenshot of the relevant area/s displayed on the interactive spatial map
2. use a drawing tool to illustrate feedback or refer to the area shown in written feedback
3. save the screenshot of the map as an image file and attach it to your submission.

Mandatory questions are indicated with an asterisk (*).

How to submit your feedback

Have your say by Sunday 29 September 2024.

Save or print the completed submission form and send it via:

Email: floodplain.planning@dpie.nsw.gov.au OR

Post: Murrumbidgee Valley FMP

Water Group – NSW DCCEEW

PO Box 189

Queanbeyan NSW 2620

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Privacy questions

Do you give permission for your name to be published with your submission? *

☒ Yes

☐ No

If you are answering on behalf of an organisation, do you give permission for your organisation's name to be published? *

☒ Yes

☐ No

☐ Not applicable

Your details

Details	
1. Given name *	Scott
2. Family name *	Hughes
3. Email address *	[REDACTED]
4. Address	
5. Phone number	
6. Are you making this submission as an individual or as a representative of an organisation? * (Mark only one)	<input type="checkbox"/> Individual (skip to question 9) <input checked="" type="checkbox"/> Organisation
7. Name of organisation	Kooba Ag
8. Who do you represent? *	<input type="checkbox"/> Government <input type="checkbox"/> Peak representative organisation <input type="checkbox"/> Aboriginal organisation <input type="checkbox"/> Environmental organisation <input type="checkbox"/> Irrigation industry <input type="checkbox"/> Mining industry <input type="checkbox"/> Other (please specify):
9. Have you read the <u>Draft Murrumbidgee Valley Floodplain Management Plan – Report to assist Stage 2 public exhibition?</u> *	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
10. Did/will you attend any of the following in relation to the Murrumbidgee Valley Floodplain Management Plan?	<input checked="" type="checkbox"/> An individual appointment <input type="checkbox"/> A phone call with departmental staff <input type="checkbox"/> A group meeting with departmental staff <input type="checkbox"/> None of these

The following sections relate to the feedback we are seeking on the draft floodplain management plan as described in the Report to assist public exhibition. Follow the steps on page 1 to provide feedback on the management zones shown in Figure 3.

Proposed management zones

The proposed management zones represent the hydraulic, ecological or Aboriginal cultural (or combination of) attributes of the land. Different rules and assessment criteria apply to each management zone. These reflect the nature of the area and consider the impact that a flood work may have on the movement of flood water, and risk to life and property.

For more information, please refer to Figure 3 and section 3 in the [Report to assist public exhibition](#). For a higher resolution version of the proposed management zones, see the [interactive spatial map](#).

<p>Please provide any comments you may have on the proposed management zones.</p> <p><i>(If relevant please attach a map to your submission.)</i></p>	<p>Proposed Management Zones are incorrect. We as a company attended numerous public information days and seminars in relation to the floodplain data. The data obtained to illustrate the Management zones are incorrect. We have attached Management Zones in conjunction with Water NSW that correctly illustrates the Management Zones.</p> <div style="background-color: black; height: 40px; width: 100%;"></div> <p>2 Maps Attached.</p>
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Proposed rules and assessment criteria for management zone A and SP

Flood works in management zone A and SP will be restricted to specific types that are essential for the protection of life and property, or improvement of the floodplain. Each type of flood work permitted will be subject to size or height restrictions to minimise the impact on the passage of floodwater.

For more information, please refer to section 4.1.1 and Table 1 in the [Report to assist public exhibition](#).

<p>Please provide any comments you may have on the flood work types permitted within management zone A and SP and associated specifications.</p>	<p>Due to incorrect data, no comment can be made or reflected upon until correct data is obtained and communicated amongst multiple agencies. i.e. WATER NSW, NSW DPIE etc</p>
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All flood works in management zone A and SP will be assessed using the standard assessment criteria. Enhancement flood works will also be assessed using the hydraulic assessment criteria.

For more information, please refer to section 4.1.1 and Table 2 in the [Report to assist public exhibition](#).

<p>Please provide any comments you may have on the proposed rules and assessment criteria for management zone A and SP.</p>	<p>Due to incorrect data, no comment can be made or reflected upon until correct data is obtained and communicated amongst multiple agencies. i.e. WATER NSW, NSW DPIE etc</p>
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Additional types of flood works are permitted within management zone A and SP if they were constructed prior to the commencement of the draft floodplain management plan, subject to complying with the standard assessment criteria.

For more information, please refer to section 4.1.1.2 and Table 2 in the [Report to assist public exhibition](#).

<p>Please provide any comments you may have on the proposed rules and assessment criteria for existing unapproved works in management zone A and SP.</p>	<p>N/A</p>
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Proposed rules and assessment criteria for management zone B

Any type of flood work will be permitted in management zone B, subject to assessment using the standard assessment criteria. Larger flood works in management zone B will require advertisement and assessment using the hydraulic assessment criteria.

There is no difference in the rules and assessment criteria for flood works constructed prior to or after the draft floodplain management plan commences.

For more information, please refer to section 4.1.2, 4.2 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for management zone B.	N/A
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Proposed rules and assessment criteria for management zone C and CU

Any type of flood work will be permitted in management zone C and CU, subject to assessment using the standard assessment criteria. Flood works that may have a significant impact on high value infrastructure will require assessment using the hydraulic assessment criteria.

There is no difference in the rules and assessment criteria for flood works constructed prior to or after the draft floodplain management plan commences.

For more information, please refer to section 4.1.2, 4.2 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for management zone C and CU.	N/A
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Proposed mandatory conditions

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1. After a flood work is removed, the area it was located must be returned to the height of the natural surface of the ground.
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3. Erosion must be prevented during the construction and use of a flood work.

For more information, please refer to section 5.3 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed mandatory conditions. <i>(If relevant please attach a map to your submission.)</i>	Mandatory Conditions not Negligible due to Water NSW not being informed of Pre - Existing (50 + years) work approvals and extraction sites utilizing approved channels and systems.
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Proposed amendment provisions

The draft floodplain management plan sets out the circumstances when the plan may be amended in the future. Of note, it proposes to amend the plan before 1 July 2028 to include rules and assessment criteria that consider the effects of climate change.

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<p>Please provide any comments you may have on the proposed amendment provisions.</p> <p><i>(If relevant please attach a map to your submission.)</i></p>	N/A
---	-----

Additional information

<p>If you have any other comments on the draft floodplain management plan, please provide them here.</p> <p><i>(If relevant please attach a map to your submission.)</i></p>	<p>Please review our maps which have detailed information where water accurately moved into the coinciding properties. This is a joined data set from Water NSW and additional Historical data from prior Floods (Past 20 Years) and High Rivers.</p>
--	---

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<p>Do you identify as Aboriginal and/or Torres Strait Islander? *</p>	

Do you speak a language other than English at home? *

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- ☐ Yes
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- ☒ I've already subscribed

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Mandatory questions are indicated with an asterisk (*).

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When publishing submissions, including maps, the department will make every effort to redact personal and identifying information (your name will be published if you provide us with permission to do so).

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Your information will be handled by the department in accordance with the [Privacy and Personal Information Protection Act 1998](#). Any personal information you provide in completing this form will only be used to inform the development of the Murrumbidgee Valley Floodplain Management Plan. We will not use or disclose the information for any other purpose, unless required or authorised to do so.

If you would like to know more about how the department meets its obligations in collecting, storing, using and sharing personal information, you can read our [Privacy statement](#) or [Privacy Management Plan](#).

If you wish to view or amend the information held by us, you can email us at floodplain.planning@dpie.nsw.gov.au, or contact the department's Information Access and Privacy Unit on 02 9860 1440 or at privacy.dcceew@environment.nsw.gov.au.

Privacy questions

Do you give permission for your name to be published with your submission? *

☒ Yes

☐ No

If you are answering on behalf of an organisation, do you give permission for your organisation's name to be published? *

☐ Yes

☐ No

☒ Not applicable

Your details

Details	
1. Given name *	Pat
2. Family name *	Hulme
3. Email address *	
4. Address	
5. Phone number	
6. Are you making this submission as an individual or as a representative of an organisation? * (Mark only one)	<input type="checkbox"/> Individual (skip to question 9) <input type="checkbox"/> Organisation
7. Name of organisation	
8. Who do you represent? *	<input type="checkbox"/> Government <input type="checkbox"/> Peak representative organisation <input type="checkbox"/> Aboriginal organisation <input type="checkbox"/> Environmental organisation <input type="checkbox"/> Irrigation industry <input type="checkbox"/> Mining industry <input type="checkbox"/> Other (please specify):
9. Have you read the <u>Draft Murrumbidgee Valley Floodplain Management Plan – Report to assist Stage 2 public exhibition?</u> *	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
10. Did/will you attend any of the following in relation to the Murrumbidgee Valley Floodplain Management Plan?	<input type="checkbox"/> An individual appointment <input type="checkbox"/> A phone call with departmental staff <input type="checkbox"/> A group meeting with departmental staff <input checked="" type="checkbox"/> None of these

The following sections relate to the feedback we are seeking on the draft floodplain management plan as described in the Report to assist public exhibition. Follow the steps on page 1 to provide feedback on the management zones shown in Figure 3.

Proposed management zones

The proposed management zones represent the hydraulic, ecological or Aboriginal cultural (or combination of) attributes of the land. Different rules and assessment criteria apply to each management zone. These reflect the nature of the area and consider the impact that a flood work may have on the movement of flood water, and risk to life and property.

For more information, please refer to Figure 3 and section 3 in the [Report to assist public exhibition](#). For a higher resolution version of the proposed management zones, see the [interactive spatial map](#).

<p>Please provide any comments you may have on the proposed management zones.</p> <p><i>(If relevant please attach a map to your submission.)</i></p>	<p>My objection is to the classification of part of [redacted] as Zone B. My understanding is that the location of the Zone B boundary boundary was based on satellite imagery of the extent of the March, 2012 flood. I believe that the area inundated on [redacted] inundated during March, 2012 was caused by local runoff rather than riverine flooding because:</p> <p>a) There was a large volume of runoff from the east of [redacted] that ponded in the southwestern corner of the farm from 175 mm rain on March 4, 2012 after 108 mm in the preceding 7 days</p> <p>b) Further water was added by uncontrolled delivery from the [redacted] onto [redacted]</p> <p>c) There was 90 ha rice grown in the western half of the 270 ha of [redacted]. This was irrigated until the end of February, and it is normal to hold water on the paddocks for a further 2 to 3 weeks, so it is likely that the area would have had the signature of inundated land during March 2012</p> <p>d) After the initial surge of runoff left [redacted] by overtopping drainage infrastructure, the last water is released into a [redacted] drainage channel. Flow of this channel was blocked a [redacted] by government employees, so water was ponded on the southwestern corner of [redacted] despite this water being higher than floodwater. In addition, [redacted] is not connected to flood - dependant ecosystems, nor has floodwater passed across [redacted] for more than 100 years.</p> <p>As a result, I believe that [redacted] is not in the Floodplain Network, and I propose to amend the zoning of the area north of [redacted] from near the junction with [redacted] to the Junction with [redacted] from Zone B to Zone C</p>
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Proposed rules and assessment criteria for management zone A and SP

Flood works in management zone A and SP will be restricted to specific types that are essential for the protection of life and property, or improvement of the floodplain. Each type of flood work permitted will be subject to size or height restrictions to minimise the impact on the passage of floodwater.

For more information, please refer to section 4.1.1 and Table 1 in the [Report to assist public exhibition](#).

<p>Please provide any comments you may have on the flood work types permitted within management zone A and SP and associated specifications.</p>	<p>Not relevant to my land</p>
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All flood works in management zone A and SP will be assessed using the standard assessment criteria. Enhancement flood works will also be assessed using the hydraulic assessment criteria.

For more information, please refer to section 4.1.1 and Table 2 in the [Report to assist public exhibition](#).

<p>Please provide any comments you may have on the proposed rules and assessment criteria for management zone A and SP.</p>	<p>Not relevant to my land</p>
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Additional types of flood works are permitted within management zone A and SP if they were constructed prior to the commencement of the draft floodplain management plan, subject to complying with the standard assessment criteria.

For more information, please refer to section 4.1.1.2 and Table 2 in the [Report to assist public exhibition](#).

<p>Please provide any comments you may have on the proposed rules and assessment criteria for existing unapproved works in management zone A and SP.</p>	<p>Not relevant to my land</p>
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Proposed rules and assessment criteria for management zone B

Any type of flood work will be permitted in management zone B, subject to assessment using the standard assessment criteria. Larger flood works in management zone B will require advertisement and assessment using the hydraulic assessment criteria.

There is no difference in the rules and assessment criteria for flood works constructed prior to or after the draft floodplain management plan commences.

For more information, please refer to section 4.1.2, 4.2 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for management zone B.	To my inexperienced eye, the rules and criteria appear similar to those applying in other floodplains.
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Proposed rules and assessment criteria for management zone C and CU

Any type of flood work will be permitted in management zone C and CU, subject to assessment using the standard assessment criteria. Flood works that may have a significant impact on high value infrastructure will require assessment using the hydraulic assessment criteria.

There is no difference in the rules and assessment criteria for flood works constructed prior to or after the draft floodplain management plan commences.

For more information, please refer to section 4.1.2, 4.2 and Table 2 in the [Report to assist public exhibition](#).

<p>Please provide any comments you may have on the proposed rules and assessment criteria for management zone C and CU.</p>	<p>To my inexperienced eye, the rules and criteria appear similar to those applying in other floodplains.</p>
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Proposed mandatory conditions

The draft floodplain management plan proposes three mandatory conditions that will apply to flood work approvals:

1. After a flood work is removed, the area it was located must be returned to the height of the natural surface of the ground.
2. Notice must be given to WaterNSW once a flood work is constructed.
3. Erosion must be prevented during the construction and use of a flood work.

For more information, please refer to section 5.3 in the [Report to assist public exhibition](#).

<p>Please provide any comments you may have on the proposed mandatory conditions.</p> <p><i>(If relevant please attach a map to your submission.)</i></p>	<p>Not sure that the natural surface elevation can be determined accurately in this area that has been irrigated for more than 100 years where soil has been moved 3 or 4 times to construct different flood irrigation layouts.</p>
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Proposed amendment provisions

The draft floodplain management plan sets out the circumstances when the plan may be amended in the future. Of note, it proposes to amend the plan before 1 July 2028 to include rules and assessment criteria that consider the effects of climate change.

For more information, please refer to section 5.4 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed amendment provisions. <i>(If relevant please attach a map to your submission.)</i>	None
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Additional information

If you have any other comments on the draft floodplain management plan, please provide them here. <i>(If relevant please attach a map to your submission.)</i>	None
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If you would like to provide any additional information to help us understand your feedback, please attach this to your submission.

The following questions help us understand how effective our communication and engagement activities are in reaching our diverse community and stakeholders. This enables us to communicate more clearly and improve opportunities for everybody to have their say.

How did you hear about this consultation? *	<input type="checkbox"/> Community group <input type="checkbox"/> Department's website <input type="checkbox"/> Email or newsletter from the department <input type="checkbox"/> Letter <input type="checkbox"/> Newspaper advertisement <input type="checkbox"/> Social media <input type="checkbox"/> Word of mouth <input type="checkbox"/> Other (please specify):
Do you identify as Aboriginal and/or Torres Strait Islander? *	

Do you speak a language other than English at home? *



Would you like to sign up to our monthly Water newsletter to stay informed and have your say about water planning, management and reform across NSW?

- ☒ Yes
- ☐ No
- ☐ I've already subscribed

Thank you for taking the time to complete this form.

Submission form for the draft Murrumbidgee Valley Floodplain Management Plan: Stage 2 public exhibition

How to fill out this form

The NSW Department of Climate Change, Energy, the Environment and Water is seeking your feedback on the draft Murrumbidgee Valley Floodplain Management Plan.

We are seeking feedback through a public exhibition process from Monday 19 August to Sunday 29 September 2024. The publication *Draft Murrumbidgee Valley Floodplain Management Plan – Report to assist Stage 2 public exhibition* provides information that can help you to complete this submission form. This report is available on the department's website at:

water.nsw.gov.au/murrumbidgee-floodplain-management-plan

To provide feedback on the management zones shown in Figure 3 in the report and on the [interactive spatial map](#), we recommend you:

1. take a screenshot of the relevant area/s displayed on the interactive spatial map
2. use a drawing tool to illustrate feedback or refer to the area shown in written feedback
3. save the screenshot of the map as an image file and attach it to your submission.

Mandatory questions are indicated with an asterisk (*).

How to submit your feedback

Have your say by Sunday 29 September 2024.

Save or print the completed submission form and send it via:

Email: floodplain.planning@dpie.nsw.gov.au OR

Post: Murrumbidgee Valley FMP

Water Group – NSW DCCEEW

PO Box 189

Queanbeyan NSW 2620

Information on privacy and confidentiality

All submissions, including maps, received by the NSW Department of Climate Change, Energy, the Environment and Water will be reviewed and published. The department values your input and accepts that information you provide may be private and personal.

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☒ Yes

☐ No

If you are answering on behalf of an organisation, do you give permission for your organisation's name to be published? *

☒ Yes

☐ No

☐ Not applicable

Your details

Details	
1. Given name *	Michael
2. Family name *	Turnell
3. Email address *	
4. Address	
5. Phone number	
6. Are you making this submission as an individual or as a representative of an organisation? * (Mark only one)	<input type="checkbox"/> Individual (skip to question 9) <input checked="" type="checkbox"/> Organisation
7. Name of organisation	Murrumbidgee Irrigation Limited
8. Who do you represent? *	<input type="checkbox"/> Government <input type="checkbox"/> Peak representative organisation <input type="checkbox"/> Aboriginal organisation <input type="checkbox"/> Environmental organisation <input checked="" type="checkbox"/> Irrigation industry <input type="checkbox"/> Mining industry <input type="checkbox"/> Other (please specify):
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<p>Please provide any comments you may have on the proposed management zones.</p> <p><i>(If relevant please attach a map to your submission.)</i></p>	<p>Please see attached document.</p>
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Proposed rules and assessment criteria for management zone A and SP

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Please provide any comments you may have on the flood work types permitted within management zone A and SP and associated specifications.	Please see attached document.
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Please provide any comments you may have on the proposed rules and assessment criteria for management zone A and SP.	Please see attached document.
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Please provide any comments you may have on the proposed rules and assessment criteria for management zone B.	Please see attached document.
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Proposed rules and assessment criteria for management zone C and CU

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There is no difference in the rules and assessment criteria for flood works constructed prior to or after the draft floodplain management plan commences.

For more information, please refer to section 4.1.2, 4.2 and Table 2 in the [Report to assist public exhibition](#).

<p>Please provide any comments you may have on the proposed rules and assessment criteria for management zone C and CU.</p>	<p>Please see attached document.</p>
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1. After a flood work is removed, the area it was located must be returned to the height of the natural surface of the ground.
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<p>Please provide any comments you may have on the proposed amendment provisions.</p> <p><i>(If relevant please attach a map to your submission.)</i></p>	<p>Please see attached document.</p>
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Additional information

<p>If you have any other comments on the draft floodplain management plan, please provide them here.</p> <p><i>(If relevant please attach a map to your submission.)</i></p>	<p>Please see attached document.</p>
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<p>Do you identify as Aboriginal and/or Torres Strait Islander? *</p>	

Do you speak a language other than English at home? *	<div></div>
Would you like to sign up to our monthly Water newsletter to stay informed and have your say about water planning, management and reform across NSW?	<div><input type="checkbox"/> Yes</div> <div><input type="checkbox"/> No</div> <div><input checked="" type="checkbox"/> I've already subscribed</div>

Thank you for taking the time to complete this form.

[REDACTED]

27 September 2024

Manager
Floodplain Planning Water Planning
NSW Department of Climate Change Energy the Environment and Water

Dear Sir/Madam

**Submission to Stage 2 of draft Floodplain Management Plan for the Murrumbidgee Valley
Murrumbidgee Irrigation Limited**

This submission is prepared in response to the draft Murrumbidgee Valley Floodplain Management Plan: Stage 2 public exhibition. This submission has been prepared and authorised by Murrumbidgee Irrigation Limited (**MI**).

Introduction

As one of the most significant operators of water management works in the Murrumbidgee Valley, MI welcomes the opportunity to provide feedback in response to Stage 2 of the draft Floodplain Management Plan (**FMP**).

MI has concerns about the interaction between the FMP and MI's network of supply and drainage works. At the present stage of the drafting process, MI feels that the FMP does not have adequate regard to water movements "on the ground" and the social and economic mandate of MI's network.


About MI

MI is an irrigation corporation regulated under the *Water Management Act 2000* (NSW) (**the Act**). It owns and operates the infrastructure system used to provide water delivery and drainage services to primary producers in the Murrumbidgee Irrigation Area (**MIA**). MI is the holder of (relevantly):

- Various bulk Water Access Licences with Water NSW, nominating the [REDACTED] amongst the authorised Water Supply Works.
- Combined Water Supply Work Approval and Water Use Approval [REDACTED] (NSW DPIE).
- Operating Licence issued by the Governor of NSW under sections 123-124 of the Act dated 7 December 2016.
- Environment Protection Licence [REDACTED] (NSW EPA).

Under its licences, approvals, and the Act, MI is authorised to enter land to perform a number of functions, including the installation and reading of water meters, ascertaining whether a water supply contract has been breached, installing, and replacing new works, and rectifying defective works. By its mandate under the Operating Licence MI has legal obligations around the maintenance, management, and operation of efficient and commercially viable systems for the delivery and drainage of water in the MIA.

[REDACTED] [REDACTED]



The MIA was first established in 1906 following the commissioning of Burrinjuck Dam in the Snowy Mountains. The MIA was conceived by the government of the day as a purpose-built scheme, designed to feed and provide employment opportunities for a growing nation. During the planning and construction phase, the NSW Government's was cognisant of flood impacts from the Murrumbidgee River and other systems such as Mirrool Creek in developing the MIA. Under the *Irrigation Corporations Act 1994* (NSW) and the conditions of the previous Water Management Works Licence [REDACTED] MI was permitted to operate as an autonomous irrigation scheme. The licence provided for the supply of water to, and the management of water within MI's area of operations. This included surface water, drainage, subsurface supply, and floodplain water management works.

MI was under State control until it was corporatised and transferred to member ownership in the late 1990s. Today the MIA is home to over 50,000 people, with most jobs tied inextricably to the water MI supply to farms and industry. MI itself has 2,305 shareholders, all of whom are the local farmers and irrigators who are served by MI's network.

MI operates on a non-profit basis. Its Constitution prevents the distribution of any profits to its members during its operation or upon winding up. The company is wholly owned by its members (customers). Those local farmers and irrigators are the people who ultimately bear any costs incurred by MI.

MI's network

MI's off-river network largely operates by gravity, originating from the [REDACTED] licenced river offtakes. MI's Water Access Licences apply to the Murrumbidgee Regulated River Water Source.

The integrity of MI's infrastructure is essential to allow access to annual allocation available on our Water Access Licences and to provide our customers with water supply and drainage services. The supply and drainage network was conceived as a whole. Any interference with upstream parts of the supply network will affect, or cut-off, downstream parts of that network. MI's network comprises over 1,740 kilometres of supply channels and 1,547 kilometres of drainage channels, serving 3,124 landholdings.

It should also be noted that as well as providing irrigation water delivery and drainage to primary producers, MI's infrastructure is used for town water supply, urban stormwater, and floodwater management. To illustrate, both Griffith City Council¹ and Narrandera Shire Council² have floodwater protocols or plans that rely on certain MI assets to mitigate harmful effects of regional flooding. In that way MI delivers a public service.

It is vitally important for any FMP to recognise the physical and historical context of the development of water infrastructure in the MIA.

FMP boundaries

The proposed floodplain boundary needs to reflect the influence of water supply works and drainage infrastructure on the movement of water across the landscape. The FMP boundaries, and/or the boundaries of the various Management Zones, should be amended to recognise the physical, historical, and critical role of MI's supply and drainage infrastructure. Currently the FMP boundaries and Management Zones do not have adequate regard to the significant in-situ infrastructure owned by MI.

Indeed, there is inconsistency between the indicated extent of inundation based on the interactive flood mapping tool, and the Narrandera Shire Council detailed flood maps based on a 1% AEP flood

¹ <https://www.griffith.nsw.gov.au/flood-studies-and-floodplain-risk-management-plans>

² <https://www.narrandera.nsw.gov.au/development/planning-tools/flood-planning>

event. For example, Figure 2.4 of the Review of the Narrandera Floodplain Risk Management Study and Plan 2019 shows riverine floodwaters generally not extending beyond the MI [REDACTED]

The FMP mapping tool shows that there are no, or no significant flood dependent ecological assets to the north of MI's [REDACTED]. Only a very small amount of the Proposed Floodway Network is to the north of MI's [REDACTED]. Even so, it is difficult to see how those areas in practice could function as part of a floodway network, where the [REDACTED] separates them from the river. The same can be said for the very small part of the proposed floodway network situated to the north of MI's [REDACTED] where (as noted above) the [REDACTED] is effectively a barrier to riverine floodwaters extending to the north.

MI recommends amending the modelling to show only those areas impacted by river flooding events during the modelled years and the removal of inundation from localised rainfall events. The draft map captures areas of the MIA that have little to no impact on the flooding of the Murrumbidgee River. Therefore, the map boundary should be significantly reduced. In recognition of the extensive network of licenced supply and drainage channels, in most cases MI's view is that the boundaries should not cover the areas of the MIA. MI feels that at least (as discussed further below) the main supply channels should be excluded from the footprint of the floodplain.

Management Zone boundaries

MI feels that the Management Zone (MZ) boundaries are inappropriate having regard to the effect of water supply works and drainage infrastructure and existing approved land uses.

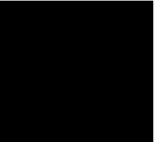
Specifically, MI makes the following points:

- Although not a MZ as such, MI's [REDACTED] appears to be marked as forming part of the floodway network. The [REDACTED] is an artificial structure that is mechanically regulated. It is bounded by large embankments on each side. By gravity it flows *away from* the river and not towards it. It is not a pathway for evacuation of riverine floodwater. It should not have been included as part of the floodway network.
- For the same reasons, the inclusion of the [REDACTED] in MZ A does not reflect the reality of how this artificial structure operates (including in times of flood).
- The inclusion of MI's arterial supply canals including the [REDACTED] in various MZs creates significant difficulty and uncertainty. That is because as long, thin structures the channels run through a series of proposed MZs. Physically it is not possible for a supply channel to function if, in different sections, it is said to be subject to different sets of rules and different MZs.

Rules and assessment criteria for Management Zones

The breadth of the Act's definition of "flood work" makes all definitions in the draft FMP a matter of significant importance to MI as the owner of a great deal of physical infrastructure within the boundaries of the FMP. MI has important assets such as the [REDACTED] which fall within clause 23 of the FMP. They bring clear benefits not only in terms of conveyance of licenced water entitlement, but in terms of preservation of life, property, and community amenity.

However, if those channels are "supply channels" as defined in the FMP, then subject to the applicable MZ any new or renewed flood work approval will be subject to stringent conditions. In MZ A, flood work approvals may be granted for supply channels (of which MI owns several in MZ A) where, among other things, the stringent matters in clause 43 are complied with.



This is concerning to MI and should also be concerning to the wider community. In Narrandera Shire Council's *Review of the Narrandera Floodplain Risk Management Study and Plan* (March 2019)³ MI's Main Canal embankment was relied on "...to reduce the impact of Main Stream Flooding on parts of Narrandera" (section 2.1). The 2012 aerial imagery at Figure 2.3 to that report, and the 1% AEP flood maps at Figure 2.4, show visually the critical role that MI's [REDACTED] plays in protecting the town. Indeed, that report at Measure 5 contemplated raising the [REDACTED] banks so that they would function as formal levees. MI also has many other channels (such as the [REDACTED]) that are similar and may also exist within MZ A.

The [REDACTED] in particular are deep and wide with large, high banks for capacity (supply to thousands of properties) and structural integrity. Those banks are recognised for their critical contribution to the preservation of life and property (as per section 29(d) of the Act). Fundamentally, MI's supply channels do not and could not comply with the various MZ requirements (especially in MZ A). Because of the channels' scale and gravity-fed nature, they could never be modified so as to comply with the requirements. While the Plan at clause 33 states that the FMP "deals with the risk to life and property" including by establishing MZs "according to the risk of constructing flood works in those areas", for MI assets in the various MZs it is difficult to see how the FMP requirements support those objectives.

Further, it is inappropriate for the banks or windrows bordering the main supply channels to be specified in the restrictive manner defined in the assessment criteria, to be eligible for flood work approvals. Similarly, and having regard to the physicality of the main supply channels (that exist to service thousands of customers) it is not possible or appropriate to define a requirement to exist only below the natural ground surface.

In MZ SP flood work approvals appear not even to be available for supply channels (clause 66). This should be rectified.

MZ A also has requirements for access roads. The FMP is required to comply with section 16 of the Act and thus should be consistent with any State Environmental Planning Policies. MI notes that *SEPP (Primary Production and Rural) 2020* applies to the whole State and permits (without approval) emergency repairs and routine maintenance of channels. That is defined to include creation of access tracks within an irrigation corporation's Area of Operations. MI feels that the FMP's requirements around flood work approval for "access roads" in MZ A (see clause section 39) are inconsistent with the provisions of the SEPP.


Aside from channels, MI assets that may be "flood works" include MI's licenced discharge points specified in MI's Combined Approval [REDACTED] (relevantly, located near [REDACTED]) and its Environment Protection Licence [REDACTED]. Physically, those discharge points are situated at the end of MI channels. There are four such works within the boundaries of the FMP. Again, despite the licenced and essential nature of those assets, and their very small geographical footprint, they may never be capable of compliance with the MZ Assessment Criteria.

Beyond that, as fully licenced and operationally critical parts of MI's network, MI would be concerned if the inclusion of those discharge points within the proposed floodway network were to curtail MI's rights and duties under the Act and the SEPP in relation to any development or enhancement of those works.

Conclusions

Overall, MI is the holder of a suite of licences and approvals to allow the continued operation of the irrigation scheme in the MIA. That scheme is operated for the collective good and also for the good of the wider MIA community. Section 120 of the Act authorises MI to construct and use water

³ Available at <https://www.narrandera.nsw.gov.au/development/planning-tools/flood-planning>



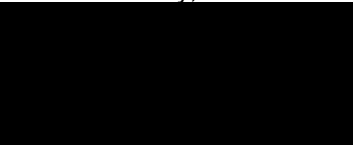
management works within its Area of Operations, as it deems necessary or appropriate. The SEPP identified above is of similar effect. The FMP should not be permitted to impede on the lawful ability of MI to manage and develop its network. The Objects and Water Management Principles of the Act include to foster social and economic benefits to communities and agriculture. Under the Act, the FPM is required to have due regard to the socio-economic impacts of its requirements.

MI feels that in its current form, the draft FMP does not strike the right balance between the various interests. Application of the rules and assessment criteria of the proposed MZs will create significant uncertainty and compliance risk for MI as a licenced irrigation corporation under the Act.

MI submits that the Plan requires a broad exemption for the works of a licenced irrigation corporation. There may be various ways to achieve this. One approach might be amendment to the various Divisions of Part 7 of the Plan to permit the granting of flood work approvals, without reference to the Assessment Criteria, to existing water management works of a licenced irrigation corporation under the Act. Another approach would be to vary the boundaries of the FMP itself, and/or of the various Management Zones and floodway network, to carve-out irrigation corporation assets in response to the submissions above. Alternately the wording of clause 3 of the Plan could be amended to add an exclusion around the works of irrigation corporations licenced under the Act.

MI has considerable expertise in the movement of floodwater “on the ground” in the Murrumbidgee Valley in and around the MIA. Our staff have supported Local Councils and flood management authorities in their efforts to protect life and property. MI would be pleased to meet and work with the Department to discuss this submission and improvements to the draft FMP.

Yours sincerely,



Michael Turnell



From: [Response Report](#)
To: [Water Floodplain Management Planning Mailbox](#)
Subject: Your form "Murrumbidgee Valley - Stage 2 Public Consultation Submissions" got a response
Date: Saturday, 28 September 2024 11:36:42 AM
Attachments: [Murrumbidgee Valley - Stage 2 Public Consultation Submissions 201201 280924 113620.pdf](#)

Your form "Murrumbidgee Valley - Stage 2 Public Consultation Submissions" has received the following response:

Submitted on: 28/09/24 11:36:20
Completion time: 1 hr. 41 min. 57 sec.

Introduction (1/5)

Q. Do you give permission for your name to be published with your submission?

R. Yes

Q. If you are answering on behalf of an organisation, do you give permission for your organisation's name to be published?

R. Yes

Your details (2/5)

Q. Given name

R. Sue

Q. Family name

R. Salmon

Q. Email address

R. [REDACTED]

Q. Address

R. [REDACTED]

Q. Phone number

[REDACTED]

Submission details (3/5)

Q. Are you making this submission as an individual or as a representative of an organisation?

R. Individual

Q. Name of organisation

R.

Q. Who do you represent?

R.

Q. Have you read the Draft Murrumbidgee Valley Floodplain Management Plan – Report to assist Stage 2 public exhibition?

R. Yes

Q. Did/will you attend any of the following in relation to the Murrumbidgee Valley Floodplain Management Plan?

R. A group meeting with departmental staff

Q. Please provide any comments you may have on the proposed management zones.

R.

Q. Please provide any comments you may have on the flood work types permitted within management zone A and SP and associated specifications.

R. This submission is made with my brother [REDACTED] who owns the [REDACTED], Murrumbidgee River front land associated with this lagoon and Murrumbidgee River front land 14 kilometres downstream at [REDACTED]. [REDACTED] has lived, worked and enjoyed the recreational benefits of the river and lagoon for 40 plus years.

Floods should be unimpeded by flood works of any type to the greatest extent possible to allow natural flooding and environmental flows to occur. The management of floods needs to mimic natural flooding events for enhanced environmental outcomes. The storing of environmental water in dams and the requirement for airspace and the lack of environmental flow releases has meant that last minute flood mitigation over extended periods has artificially driven demand for flood work types that would not be necessary if environmental flows were allowed. These extended periods of flood mitigation cause bank collapse, and fish kills. Releases are too high for too long.

Q. Please provide any comments you may have on the proposed rules and assessment criteria for management zone A and SP.

R. We support the plan's proposed flood works types in the draft plan that allow landowners to access and protect property. We note floods are inherently difficult to manage even with rules and assessment criteria. Impacts of climate change mean flooding will be even more difficult to manage in future. We support the mandatory condition to protect water quality but note that in past floods there have been fish kills showing the difficulty of controlling water quality, especially if the flooding event is long lasting. See photos sent separately to the provided email. We support the mandatory condition to decommission works if it enhances ecological assets and better protects wetlands etc. We support the proposed amendment to consider climate change as it will very significantly determine future conditions in the flood plain.

Q. Please provide any comments you may have on the proposed rules and assessment criteria for existing unapproved works in management zone A and SP.

R. We cautiously support the draft FMP providing modification requirements to allow approval of existing floodplain works that are causing connectivity and hydraulic issues so long as ecological outcomes are enhanced.

Your submission (4/5)

Q. Please provide any comments you may have on the proposed rules and assessment criteria for management zone B.

R. All works should be advertised. The same rules to apply to works constructed before or after the FMP commences.

Q. Please provide any comments you may have on the proposed rules and assessment criteria for management zone C and CU.

R.

Q. Please provide any comments you may have on the proposed mandatory conditions.

R. We support the proposed mandatory conditions.

Q. Please provide any comments you may have on the proposed amendment provisions.

R. It is very disappointing that it will take till July 2028 to include rules and assessment criteria that consider the effects of climate change but it is essential that this work is done at the earliest opportunity.

Additional information (5/5)

Q. If you have any other comments on the draft floodplain management plan, please provide them here.

R.

Q. How did you hear about this consultation?

R. Email or newsletter from the department

Q. If other above, specify here

R.

Q. Do you identify as Aboriginal and/or Torres Strait Islander?

R. ☐

Q. Do you speak a language other than English at home?

R. ☐

Q. Would you like to sign up to our monthly Water newsletter to stay informed and have your say about water planning, management and reform across NSW?

R. I've already subscribed













[Murrumbidgee Valley - Stage 2 Public Consultation Submissions](#)

Response ID: [201365](#)

Submitted Date: 29/09/24 13:02:43

Completion Time: 18 min. 28 sec.

Introduction (Page 1 /5)

We are seeking feedback on the [draft Murrumbidgee Valley Floodplain Management Plan](#) through Stage 2 public exhibition, including a formal submission process from 19 August until 29 September 2024.

Enquiries and assistance: floodplain.planning@dpie.nsw.gov.au

Please submit this form by **11.59pm (AEST) on 29 September 2024.**

How to fill out this form

The publication [Draft Murrumbidgee Valley Floodplain Management Plan – Report to assist Stage 2 public exhibition](#) provides information that can help you to complete this submission form.

To provide feedback on the management zones shown in Figure 3 in the report and on the [interactive spatial map](#), we recommend you:

1. take a screenshot of the relevant area/s displayed on the [interactive spatial map](#)
2. use a drawing tool to illustrate feedback or refer to the area shown in written feedback
3. save the screenshot of the map as an image file and attach it to your submission.

Important information about this form

You **cannot save a draft** of this form and access it later—you will need to create and **submit the form in one session.**

The fields marked with an asterisk * are mandatory and must be completed to submit the form.

After you have submitted your form, a copy of the submission will be sent to your email address.

If you have any questions about the submission form, please email: floodplain.planning@dpie.nsw.gov.au

Privacy and confidentiality

All submissions, including maps, received by the NSW Department of Climate Change, Energy, the Environment and Water will be reviewed and published. The department values your input and accepts that information you provide may be private and personal.

When publishing submissions, including maps, the department will make every effort to redact personal and identifying information (your name will be published if you provide us with permission to do so).

If you want your name to be treated as confidential, please indicate this by ticking the relevant box below.

Your information will be handled by the department in accordance with the [Privacy and Personal Information Protection Act 1998](#). Any personal information you provide in completing this form will only be used to inform the development of the Murrumbidgee Valley Floodplain Management Plan. We will not use or disclose the information for any other purpose, unless required or authorised to do so.

If you would like to know more about how the department meets its obligations in collecting, storing, using and sharing personal information, you can read our complete [Privacy Policy or Privacy Management Plan](#).

If you wish to view or amend the information held by us, you can email us at floodplain.planning@dpie.nsw.gov.au, or contact the department's privacy officer on 02 9860 1440 or at privacy.dcceew@environment.nsw.gov.au.

Permission

Do you give permission for your name to be published with your submission?

No

If you are answering on behalf of an organisation, do you give permission for your organisation's name to be published?

No

Your details (Page 2 /5)

Given name

██████

Family name

Email address

Address

Phone number

Submission details (Page 3 /5)

Are you making this submission as an individual or as a representative of an organisation?

Individual

Have you read the Draft Murrumbidgee Valley Floodplain Management Plan – Report to assist Stage 2 public exhibition?

Yes

Did/will you attend any of the following in relation to the Murrumbidgee Valley Floodplain Management Plan?

An individual appointment

The following sections relate to the feedback we are seeking on the draft floodplain management plan as described in the Report to assist public exhibition. Follow the steps on page 1 to provide feedback on the management zones shown in Figure 3 in the [Report to assist public exhibition](#).


The proposed management zones represent the hydraulic, ecological or Aboriginal cultural (or combination of) attributes of the land. Different rules and assessment criteria apply to each management zone. These reflect the nature of the area and consider the impact that a flood work may have on the movement of flood water, and risk to life and property.

For more information, please refer to Figure 3 and section 3 in the [Report to assist public exhibition](#). For a higher resolution version of the proposed management zones, see the [interactive spatial map](#).

Please provide any comments you may have on the proposed management zones.

Our property was purchased in 2022 with an already existing floodwork, that has protected a number people and houses from floods. The current mapping model is incorrect and has this landholding in Zone B. Following the decision tree pathway you will note that the classification for this landholding should be Zone B. Therefore we propose that the zoning area be changed from Zone B to Zone C for this landholding. It is imperative to note this landholding has not flooded even during the events listed in the modeling. This was previously a rice farm during those events therefore the data needs to be verified.

If relevant please attach a map to your submission.

Decision Tree  **.png**

Flood works in management zone A and SP will be restricted to specific types that are essential for the protection of life and property, or improvement of the floodplain. Each type of flood work permitted will be subject to size or height restrictions to minimise the impact on

the passage of floodwater.

For more information, please refer to section 4.1.1 and Table 1 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the flood work types permitted within management zone A and SP and associated specifications.

No Comment

All flood works in management zone A and SP will be assessed using the standard assessment criteria. Enhancement flood works will also be assessed using the hydraulic assessment criteria.

For more information, please refer to section 4.1.1 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for management zone A and SP.

No Comment

Additional types of flood works are permitted within management zone A and SP if they were constructed prior to the commencement of the draft floodplain management plan, subject to complying with the standard assessment criteria.

For more information, please refer to section 4.1.1.2 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for existing unapproved works in management zone A and SP.

No Comment

Your submission (Page 4 /5)

Any type of flood work will be permitted in management zone B, subject to assessment using the standard assessment criteria. Larger flood works in management zone B will require advertisement and assessment using the hydraulic assessment criteria.

There is no difference in the rules and assessment criteria for flood works constructed prior to or after the draft floodplain management plan commences.

For more information, please refer to section 4.1.2, 4.2 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for management zone B.

In Zone B there is no special allowance given for landholders to build a direct access road or evacuation road on their property to use in the event of a major flood, however there is special allowance given to those landholders in Zone A. The current allowable height of only 40cm is not sufficient for the safety of those needing to evacuate in a flood event. Zone B should replicate Zone A with the maximin height of 50cm for primary access roads which is 20cm above the allowable flood work height of 30cm. If Zone B was to be imposed over member's irrigation properties, each and

every internal channel would need to be included in the floodwork approval. This would result in operational issues, mainly works on internal roads, channel bank, bankless channel and head ditch banks are higher than 40cm which is the limit for Zone B area, any work undertaken on the channels would be subject to floodwork amendments, and flood modeling.

Any type of flood work will be permitted in management zone C and CU, subject to assessment using the standard assessment criteria. Flood works that may have a significant impact on high value infrastructure will require assessment using the hydraulic assessment criteria.

There is no difference in the rules and assessment criteria for flood works constructed prior to or after the draft floodplain management plan commences.

For more information, please refer to section 4.1.2, 4.2 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for management zone C and CU.

This landholding requests to be listed as Zone C. The image attached shows significant number of houses and life affected if landholding remains in Zone B. No comment for Zone C and CU

The draft floodplain management plan proposes three mandatory conditions that will apply to flood work approvals:

1. After a flood work is removed, the area it was located must be returned to the height of the natural surface of the ground.
2. Notice must be given to WaterNSW once a flood work is constructed.
3. Erosion must be prevented during the construction and use of a flood work.

For more information, please refer to section 5.3 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed mandatory conditions.

Restrictions on the types of floodworks permitted, combined with size and height limitations, may limit landholders' ability to construct or modify floodworks necessary to protect their property, crops, or infrastructure. Landholders with existing flood works may face challenges in obtaining approvals if their infrastructure doesn't meet the new criteria, potentially leading to expensive modifications or even deconstruction. Existing floodworks should not be subject to deconstruction, particularly in instances where landholders have inherited floodworks from previous owners.

If relevant please attach a map to your submission.

Houses affected under Zone B.png

The draft floodplain management plan sets out the circumstances when the plan may be amended in the future. Of note, it proposes to amend the plan before 1 July 2028 to include rules and assessment criteria that consider the effects of climate change.

For more information, please refer to section 5.4 in the Report to assist public exhibition.

Please provide any comments you may have on the proposed amendment provisions.

Without adequate consultation, landholders may face risks such as increased regulatory burdens, restrictions on flood work approvals, or changes in flood management practices that could adversely affect their ability to protect crops, infrastructure, and property from flooding. Amendments, particularly those that respond to climate change impacts, may introduce new challenges and should be included in the consultation process. Engaging landholders in the consultation process ensures that their concerns are addressed and that any changes balance public interest with the practical realities of managing flood zones.

If relevant please attach a map to your submission.

.....

Additional information (Page 5 /5)

If you have any other comments on the draft floodplain management plan, please provide them here.

There has been no evidence of inundation flooding on this landholding.

If relevant please attach a map to your submission.

The following questions help us understand how effective our communication and engagement activities are in reaching our diverse community and stakeholders. This enables us to communicate more clearly and improve opportunities for everybody to have their say.

How did you hear about this consultation?

Department's website

If other above, specify here

Do you identify as Aboriginal and/or Torres Strait Islander?



Do you speak a language other than English at home?



Would you like to sign up to our monthly Water newsletter to stay informed and have your say about water planning, management and reform across NSW?

Yes

.....

File List (Protected)

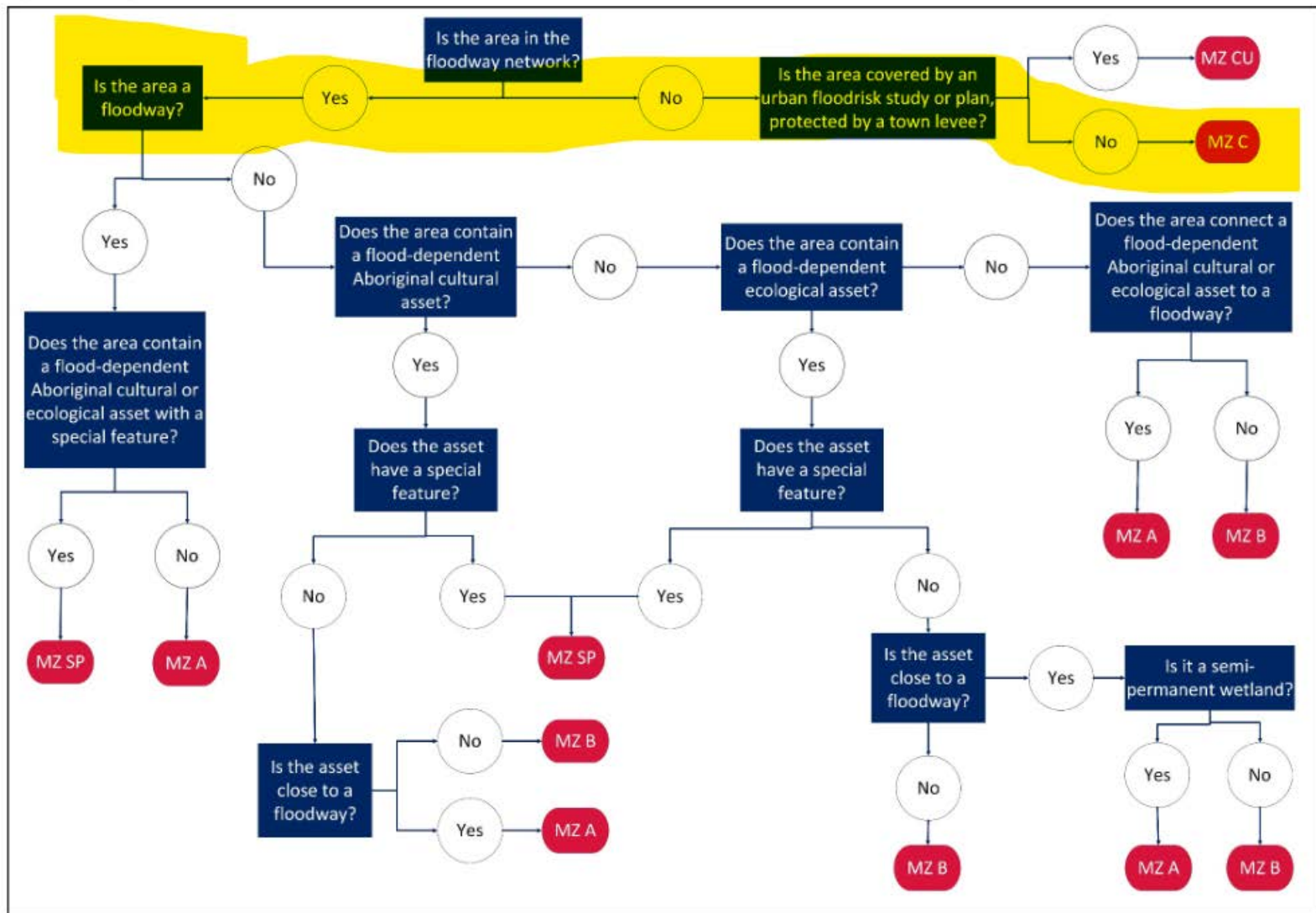
Decision Tree .png (325Kb.):



Houses affected under Zone B.png (546Kb.):

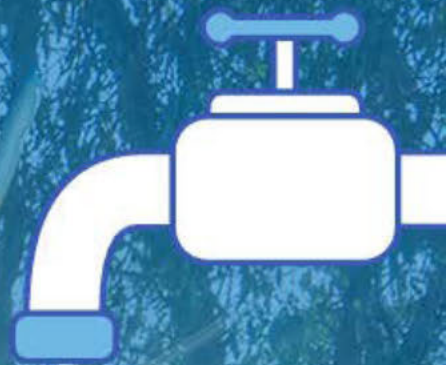


Figure 2: Management zone classification decision tree

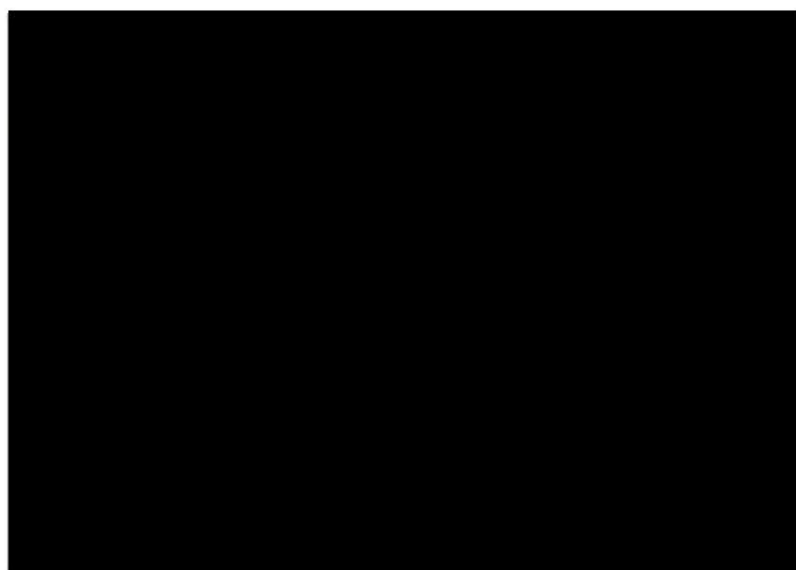




Submission



**Murrumbidgee
Floodplain
Planning
Stage Two**



Contents

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Proposed rules and assessment criteria for management zone A and SP	3
Proposed rules and assessment criteria for management zone B	4
Proposed rules and assessment criteria for management zone C and CU	4
Proposed mandatory conditions	5
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Background

██████████ appreciate this opportunity to make a submission to Murrumbidgee Floodplain Planning – Stage Two.

██████████ represents approximately 400 regulated and unregulated water users in the Murrumbidgee Valley outside of the ██████████. Our membership takes in a broad area, communities and commodities, from Gundagai to Balranald to Moulamein. ██████████ accounts for approximately one third of the diversions on the Murrumbidgee system with approximately 400,000 megalitres being made up of High Security and General Security entitlements dispersed amongst the members.

██████████ represents approximately 270,000 megalitres of groundwater entitlements shared by approximately 250 groundwater users in the Murrumbidgee Valley which comprises a large agricultural area in the vicinity of 84,000 square kilometers in the southwest of NSW. The ██████████ members' generation of food and fibre production support the townships of Leeton, Griffith, Darlington Point, Coleambally, Hay, Carathool and Jerilderie. Many of the farming enterprises provide extensive employment opportunities due to the high labour component required to plant and harvest their commodities.

The Riverina, known as the “food bowl of NSW” produces these main summer crops such as corn, sorghum, sunflowers, rice, cotton, prime lambs, beef cattle, wine grapes, citrus, almonds, walnuts and wool.

Introduction

██████████ have significant concerns regarding the Department's current approach to developing the new floodplain management plan. The approach fails to account for existing infrastructure. Additionally, ██████████ lack confidence that the Department is properly considering the impact of recent land developments on water movement across the landscape. It is essential for the Department to recognise that many of these developments occurred prior to the existence of a floodplain management plan or the requirement for flood work approvals at the time of construction.

While ██████████ agree that previous floodplain management plans, which were fragmented and inconsistent across the landscape, are insufficient, the new plan must incorporate existing infrastructure on the floodplain as essential components. These existing works should be factored into the delineation of floodplain boundaries and the determination of permitted flood work types to ensure that both past and current infrastructure needs are appropriately addressed.

Proposed Management Zones

members are urging the department to take proactive steps by directly engaging with landholders within the proposed management zones to gain a clearer and more accurate understanding of how the changes will impact farming operations. Members feel this consultation process has not properly captured each affected landholder. Many members, particularly those who have been incorrectly classified in Zone B, have identified significant mapping errors. For instance, large-scale rice cropping areas have been mistakenly marked as flood-prone zones, despite the presence of irrigation systems rather than natural flooding. Additionally, breaches in canals have allowed water to flow onto properties that are typically dry, further distorting the data. In some cases, farming families with generations of experience on the land have reported that no actual floodwaters have ever entered their properties. These errors underscore the need for a more tailored and informed approach to the zone classifications, ensuring that local knowledge is considered in the decision-making process.

If the existing floodworks now classified in Zone B were to be dismantled or altered, there could be significant risks to farming operations. However, it is important to note that homes should not be at risk, as they are not typically located within areas that are meant to be flood-prone (see Image 1 example).

While homes should remain outside the direct risk zones, the economic impact on farming operations could still be substantial if the floodworks are removed. Machinery and farm infrastructure would be exposed to potential flood damage, threatening the livelihood of farmers. In addition, storage areas for crops and livestock feed, which are essential for maintaining farm operations, could also be at risk of flooding and contamination.

The potential of dismantling or alteration of existing floodworks in Zone B directly conflicts with the Department's stated goal of managing the passage of floodwaters through the floodplain to minimise the risk to property from the effects of flooding. By removing these protective structures, the risk to valuable agricultural infrastructure, machinery, and land significantly increases, undermining the very objective of minimising property damage. Instead of ensuring controlled floodwater movement, such changes would expose farms to greater vulnerability, contradicting the intended purpose of floodplain management.

Proposed rules and assessment criteria for management zone A and SP

have no comment on the proposed rules and assessment criteria for management zone A and SP.

Proposed rules and assessment criteria for management zone B

In Zone B there is no special allowance given for landholders to build a direct access road or evacuation road on their property to use in the event of a major flood, however there is special allowance given to those landholders in Zone A. The current allowable height of only 40cm is not sufficient for the safety of those needing to evacuate in a flood event. (see example in figure 1).

Zone B should replicate Zone A with the maximum height of 50cm for primary access roads which is 20cm above the allowable flood work height of 30cm.

If Zone B was to be imposed over member's irrigation properties, each and every internal channel would need to be included in the floodwork approval. This would result in operational issues, mainly works on internal roads, channel bank, bankless channel and head ditch banks that are higher than 40cm which is the limit for Zone B area, any work undertaken on the channels would be subject to floodwork amendments, and flood modeling significantly impacting the farm operations and imposing additional costs.

There is a risk that the legal right of the landholders to maintain best practice farming operations will be removed and placed under control of WaterNSW or others if the Zone B is imposed on internal changes to irrigation works.

Current members listed as Zone B strongly recommend this is incorrect and should be classified as Zone C. (See figure 2).

Proposed rules and assessment criteria for management zone C and CU

have no comment on the proposed rules and assessment criteria for management zone C and CU



Proposed mandatory conditions

The proposed rules and assessment criteria in the draft floodplain management plan could have several potential impacts on landholders, particularly those in management zones A and SP. Restrictions on the types of floodworks permitted, combined with size and height limitations, may limit landholders' ability to construct or modify floodworks necessary to protect their property, crops, or infrastructure.

Landholders with existing flood works may face challenges in obtaining approvals if their infrastructure doesn't meet the new criteria, potentially leading to expensive modifications or even deconstruction. Existing floodworks should not be subject to deconstruction, particularly in instances where landholders have inherited floodworks from previous owners.

Moreover, the limitations on road heights, particularly in floodways, could affect access during floods, potentially disrupting farm operations and increasing evacuation risks. While existing infrastructure might be permitted to remain, it will be subject to strict assessment criteria, meaning any non-compliant structures could face refusal of approval. Landholders in zones B, C, and CU may have more flexibility, but they still must comply with assessment standards, especially for larger flood works. Overall, these regulations could impose significant financial and operational burdens on landholders who rely on flood works for the protection and function of their properties.

It would be of benefit to disclose to the public the current 48 floodwork approvals for the 89 floodworks within the current framework.



Proposed amendment provisions

The amendment provisions of the draft floodplain management plan present both opportunities and risks for landholders, making public consultation essential whenever significant changes are proposed. While administrative amendments, such as typographical corrections, do not require public input, any amendment that could affect existing flood work approval holders or other landholders within the floodplain should involve a formal consultation process. This process is crucial because amendments could include altering maps, refining management zones, or changing the rules and assessment criteria, all of which could directly impact landholders' operations and property protection.

Without adequate consultation, landholders may face risks such as increased regulatory burdens, restrictions on flood work approvals, or changes in flood management practices that could adversely affect their ability to protect crops, infrastructure, and property from flooding. Amendments, particularly those that respond to climate change impacts, may introduce new challenges and should be included in the consultation process. Engaging landholders in the consultation process ensures that their concerns are addressed and that any changes balance public interest with the practical realities of managing flood zones.

Moreover, the department's commitment to amending the draft floodplain plan within the first three years to include rules accounting for climate change further underscores the importance of public input. Landholders need to be involved in these discussions to ensure that future amendments are informed by local knowledge and do not place undue pressure on rural economies or flood-dependent ecosystems. Failing to properly consult on such changes could increase the risk of unintended consequences, such as unworkable regulations or overlooked vulnerabilities in flood management.

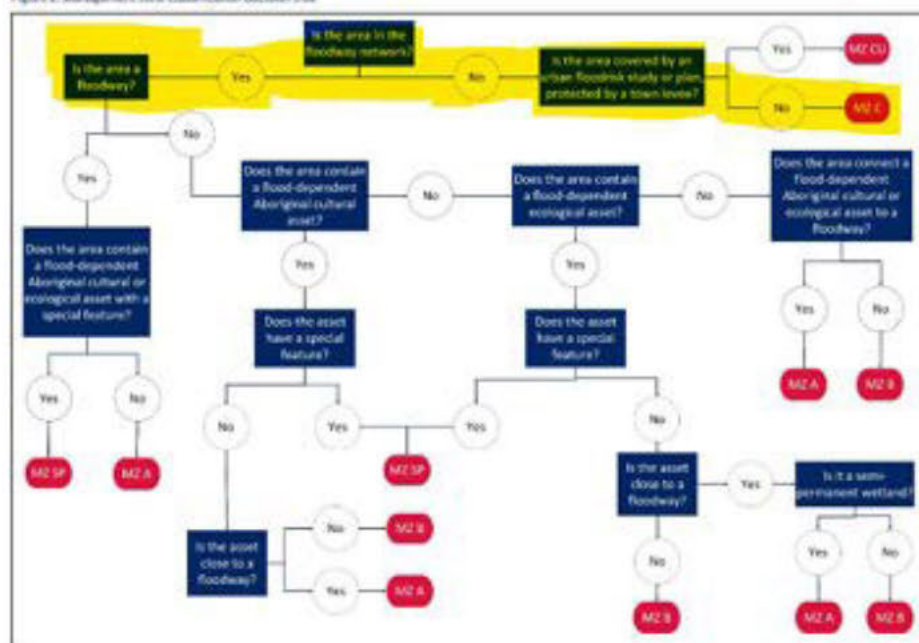
Our members are seeking information on how this process will engage landholders and how long the consultation will run for. The immediate reaction to the current consultation shows that not enough effort has been made to consult with each individual, impacted landholder, therefore current consultation should not be considered acceptable.

Appendix

Figure 2

Figure 2 – sent in by a member to show their individual land that has been listed as Zone B – should be Zone C.


Figure 2: Management zone classification decision tree





Conclusion

Thank you for the opportunity to provide a submission for the Murrumbidgee Floodplain Planning – Stage Two.

 strongly urge the Department to address the significant concerns raised by landholders regarding the development of the new floodplain management plan. It is crucial that the Department consider existing infrastructure, particularly floodworks, whether approved or not and engage in thorough and inclusive consultation with **all impacted landholders**. The proposed management zones, particularly Zone B, present operational challenges and potential risks to property and livelihoods, making it imperative that the plan reflects the realities of farming in flood-prone areas. Furthermore, any amendments to the plan should be made with careful consideration of landholders knowledge, ensuring that floodplain boundaries, floodworks, and infrastructure are managed in a way that protects both life and property without imposing unnecessary financial or operational burdens on landholders.

The amendment provisions, while providing flexibility, also underscore the importance of ongoing consultation, particularly as the Department begins to incorporate climate change considerations into the plan. A transparent and inclusive consultation process is essential to ensure that the plan serves the best interests of all stakeholders and that landholders are given the necessary tools and information to adapt to new regulations without jeopardising their operations. Failure to engage landholders in this process risks undermining the success of the floodplain management plan and exposing farms to greater vulnerability.

Submission form for the draft Murrumbidgee Valley Floodplain Management Plan: Stage 2 public exhibition

How to fill out this form

The NSW Department of Climate Change, Energy, the Environment and Water is seeking your feedback on the draft Murrumbidgee Valley Floodplain Management Plan.

We are seeking feedback through a public exhibition process from Monday 19 August to Sunday 29 September 2024. The publication *Draft Murrumbidgee Valley Floodplain Management Plan – Report to assist Stage 2 public exhibition* provides information that can help you to complete this submission form. This report is available on the department's website at:

water.nsw.gov.au/murrumbidgee-floodplain-management-plan

To provide feedback on the management zones shown in Figure 3 in the report and on the [interactive spatial map](#), we recommend you:

1. take a screenshot of the relevant area/s displayed on the interactive spatial map
2. use a drawing tool to illustrate feedback or refer to the area shown in written feedback
3. save the screenshot of the map as an image file and attach it to your submission.

Mandatory questions are indicated with an asterisk (*).

How to submit your feedback

Have your say by Sunday 29 September 2024.

Save or print the completed submission form and send it via:

Email: floodplain.planning@dpie.nsw.gov.au OR

Post: Murrumbidgee Valley FMP

Water Group – NSW DCCEEW

PO Box 189

Queanbeyan NSW 2620

Information on privacy and confidentiality

All submissions, including maps, received by the NSW Department of Climate Change, Energy, the Environment and Water will be reviewed and published. The department values your input and accepts that information you provide may be private and personal.

When publishing submissions, including maps, the department will make every effort to redact personal and identifying information (your name will be published if you provide us with permission to do so).

If you want your name to be treated as confidential, please indicate this by ticking the relevant box below.

Your information will be handled by the department in accordance with the [Privacy and Personal Information Protection Act 1998](#). Any personal information you provide in completing this form will only be used to inform the development of the Murrumbidgee Valley Floodplain Management Plan. We will not use or disclose the information for any other purpose, unless required or authorised to do so.

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If you wish to view or amend the information held by us, you can email us at floodplain.planning@dpie.nsw.gov.au, or contact the department's Information Access and Privacy Unit on 02 9860 1440 or at privacy.dcceew@environment.nsw.gov.au.

Privacy questions

Do you give permission for your name to be published with your submission? *

☒ Yes

☐ No

If you are answering on behalf of an organisation, do you give permission for your organisation's name to be published? *

☐ Yes

☐ No

☒ Not applicable

Your details

Details	
1. Given name *	MATT
2. Family name *	TOSCAN
3. Email address *	[REDACTED]
4. Address	[REDACTED]
5. Phone number	[REDACTED]
6. Are you making this submission as an individual or as a representative of an organisation? * (Mark only one)	<input checked="" type="checkbox"/> Individual (skip to question 9) <input type="checkbox"/> Organisation
7. Name of organisation	
8. Who do you represent? *	<input type="checkbox"/> Government <input type="checkbox"/> Peak representative organisation <input type="checkbox"/> Aboriginal organisation <input type="checkbox"/> Environmental organisation <input type="checkbox"/> Irrigation industry <input type="checkbox"/> Mining industry <input type="checkbox"/> Other (please specify):
9. Have you read the <u>Draft Murrumbidgee Valley Floodplain Management Plan – Report to assist Stage 2 public exhibition?</u> *	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
10. Did/will you attend any of the following in relation to the Murrumbidgee Valley Floodplain Management Plan?	<input checked="" type="checkbox"/> An individual appointment <input type="checkbox"/> A phone call with departmental staff <input type="checkbox"/> A group meeting with departmental staff <input type="checkbox"/> None of these

The following sections relate to the feedback we are seeking on the draft floodplain management plan as described in the Report to assist public exhibition. Follow the steps on page 1 to provide feedback on the management zones shown in Figure 3.

Proposed management zones

The proposed management zones represent the hydraulic, ecological or Aboriginal cultural (or combination of) attributes of the land. Different rules and assessment criteria apply to each management zone. These reflect the nature of the area and consider the impact that a flood work may have on the movement of flood water, and risk to life and property.

For more information, please refer to Figure 3 and section 3 in the [Report to assist public exhibition](#). For a higher resolution version of the proposed management zones, see the [interactive spatial map](#).

<p>Please provide any comments you may have on the proposed management zones.</p> <p><i>(If relevant please attach a map to your submission.)</i></p>	<p>I HAVE ATTACHED MAPS WITH EDITED [REDACTED] LINES TO SHOW CHANGES THAT SHOULD BE MADE.</p> <p>I DO NOT AGREE WITH THE RESTRICTIONS ON THE CONSTRUCTION OF ABOVE GROUND SUPPLY CHANNELS ACROSS ZONE A IF SOLUTIONS TO CONNECT SIGNIFICANT ENVIRONMENTAL SITES CAN BE ACHIEVED.</p>
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Proposed rules and assessment criteria for management zone A and SP

Flood works in management zone A and SP will be restricted to specific types that are essential for the protection of life and property, or improvement of the floodplain. Each type of flood work permitted will be subject to size or height restrictions to minimise the impact on the passage of floodwater.

For more information, please refer to section 4.1.1 and Table 1 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the flood work types permitted within management zone A and SP and associated specifications.	<p>ZONE A SHOULD ALLOW ABOVE GROUND CHANNELS.</p> <p>EXISTING WORKS SHOULD BE TREATED DIFFERENTLY TO PROPOSED NEW WORKS AS THERE IS A HISTORY OF DEPENDENCE ON THESE WORKS.</p> <p>ARRANGEMENTS BETWEEN NEIGHBOURS SHOULD BE FLEXIBLE TO ALLOW SIGNIFICANT SITES TO BE CONNECTED WHILE STILL ALLOWING THE DEVELOPED LAND TO CO EXIST.</p>
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All flood works in management zone A and SP will be assessed using the standard assessment criteria. Enhancement flood works will also be assessed using the hydraulic assessment criteria.

For more information, please refer to section 4.1.1 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for management zone A and SP.	<p>TOO RESTRICTIVE. IF A FLOOD IS PASSING THROUGH UNDEVELOPED LAND AT 10CM DEPTH, WHAT DOES IT MATTER IF IT IS 20 OR 30CM DEEP. WORKS SHOULD ALLOW FOR THE RAISING OF WATER HEIGHT ON UNDEVELOPED LAND, AS LONG AS THE WATER IS NOT PERMANENTLY DAMMING (PONDING).</p>
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Additional types of flood works are permitted within management zone A and SP if they were constructed prior to the commencement of the draft floodplain management plan, subject to complying with the standard assessment criteria.

For more information, please refer to section 4.1.1.2 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for existing unapproved works in management zone A and SP.	<p>REALLY EXPENSIVE EXERCISE TO BURDEN AN IRRIGATOR WITH TO APPLY FOR THE WORK APPROVAL, ESPECIALLY IF THIS IS AN EXISTING WORK.</p> <p>- A 2 STAGE APPLICATION COST SHOULD BE USED FOR NEW VS EXISTING WORKS.</p> <p>REALLY HUGE BURDEN ON A FAMILY FARM!</p>
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Proposed rules and assessment criteria for management zone B

Any type of flood work will be permitted in management zone B, subject to assessment using the standard assessment criteria. Larger flood works in management zone B will require advertisement and assessment using the hydraulic assessment criteria.

There is no difference in the rules and assessment criteria for flood works constructed prior to or after the draft floodplain management plan commences.

For more information, please refer to section 4.1.2, 4.2 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for management zone B.	<p>EXISTING WORKS SHOULD BE TREATED SEPARATELY TO PROPOSED WORKS IN THE ASSESSMENT CRITERIA.</p> <p>EXISTING WORKS SHOULD NOT BEAR THE PROPOSED HUGE APPLICATION COSTS AND HYD MODELLING COSTS.</p> <p>COLLABORATION AND AGREEMENT WITH ADJOINING NEIGHBOURS TO ALLOW FOR A COMMON GOAL TO CONNECT WATER FLOW SHOULD BE REASON ENOUGH TO ALLOW FOR WORKS TO BE APPROVED.</p>
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Proposed rules and assessment criteria for management zone C and CU

Any type of flood work will be permitted in management zone C and CU, subject to assessment using the standard assessment criteria. Flood works that may have a significant impact on high value infrastructure will require assessment using the hydraulic assessment criteria.

There is no difference in the rules and assessment criteria for flood works constructed prior to or after the draft floodplain management plan commences.

For more information, please refer to section 4.1.2, 4.2 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for management zone C and CU.

Proposed mandatory conditions

The draft floodplain management plan proposes three mandatory conditions that will apply to flood work approvals:

1. After a flood work is removed, the area it was located must be returned to the height of the natural surface of the ground.
2. Notice must be given to WaterNSW once a flood work is constructed.
3. Erosion must be prevented during the construction and use of a flood work.

For more information, please refer to section 5.3 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed mandatory conditions.
(If relevant please attach a map to your submission.)

Proposed amendment provisions

The draft floodplain management plan sets out the circumstances when the plan may be amended in the future. Of note, it proposes to amend the plan before 1 July 2028 to include rules and assessment criteria that consider the effects of climate change.

For more information, please refer to section 5.4 in the [Report to assist public exhibition](#).

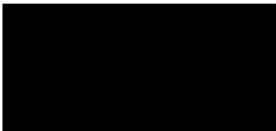
<p>Please provide any comments you may have on the proposed amendment provisions.</p> <p><i>(If relevant please attach a map to your submission.)</i></p>	<p>"TO INCLUDE RULES AND ASSESSMENT CRITERIA THAT CONSIDER THE EFFECTS OF CLIMATE CHANGE" LEAVES STAKEHOLDERS:</p> <ul style="list-style-type: none"> - VENERABLE TO ON THE GO POLICY - ERODED PROPERTY RIGHTS - REDUCES SECURITY AND PROPERTY VALUES. <p>THIS NEEDS TO BE REMOVED.</p>
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Additional information

<p>If you have any other comments on the draft floodplain management plan, please provide them here.</p> <p><i>(If relevant please attach a map to your submission.)</i></p>	<p>HUGE BURDEN ON TO IRRIGATORS WHO HAVE ALREADY BEEN GRANTED WORK APPROVALS TO IRRIGATE THEIR LAND (LOTS NOMINATED ON THE WORK APPROVALS) WHICH HAVE ALLOWED FOR THE CONSTRUCTION OF BORE OR RIVER PUMPS AND ASSOCIATED INFRASTRUCTURE TO IRRIGATE AND RECYCLE TAIL WATER. NOW BEING ASKED TO FOOT THE BILL TO APPLY TO HAVE THOSE WORKS APPROVED BECAUSE THEY ARE CONSTRUCTED ON A FLOODPLAIN! THIS IS AIMED AT ENVIRONMENTAL OUTCOMES, THEN WHY SHOULD AN INDIVIDUAL LANDHOLDER PAY IF IT WILL BENEFIT THE WHOLE COMMUNITY?</p>
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If you would like to provide any additional information to help us understand your feedback, please attach this to your submission.

The following questions help us understand how effective our communication and engagement activities are in reaching our diverse community and stakeholders. This enables us to communicate more clearly and improve opportunities for everybody to have their say.

<p>How did you hear about this consultation? *</p>	<p><input type="checkbox"/> Community group</p> <p><input type="checkbox"/> Department's website</p> <p><input checked="" type="checkbox"/> Email or newsletter from the department</p> <p><input type="checkbox"/> Letter</p> <p><input type="checkbox"/> Newspaper advertisement</p> <p><input type="checkbox"/> Social media</p> <p><input checked="" type="checkbox"/> Word of mouth</p> <p><input type="checkbox"/> Other (please specify):</p>
<p>Do you identify as Aboriginal and/or Torres Strait Islander? *</p>	

Do you speak a language other than English at home? *



Would you like to sign up to our monthly Water newsletter to stay informed and have your say about water planning, management and reform across NSW?

- ☐ Yes
☐ No
☒ I've already subscribed

Thank you for taking the time to complete this form.

Submission form for the draft Murrumbidgee Valley Floodplain Management Plan: Stage 2 public exhibition

How to fill out this form

The NSW Department of Climate Change, Energy, the Environment and Water is seeking your feedback on the draft Murrumbidgee Valley Floodplain Management Plan.

We are seeking feedback through a public exhibition process from Monday 19 August to Sunday 29 September 2024. The publication *Draft Murrumbidgee Valley Floodplain Management Plan – Report to assist Stage 2 public exhibition* provides information that can help you to complete this submission form. This report is available on the department's website at:

water.nsw.gov.au/murrumbidgee-floodplain-management-plan

To provide feedback on the management zones shown in Figure 3 in the report and on the [interactive spatial map](#), we recommend you:

1. take a screenshot of the relevant area/s displayed on the interactive spatial map
2. use a drawing tool to illustrate feedback or refer to the area shown in written feedback
3. save the screenshot of the map as an image file and attach it to your submission.

Mandatory questions are indicated with an asterisk (*).

How to submit your feedback

Have your say by Sunday 29 September 2024.

Save or print the completed submission form and send it via:

Email: floodplain.planning@dpie.nsw.gov.au OR

Post: Murrumbidgee Valley FMP

Water Group – NSW DCCEEW

PO Box 189

Queanbeyan NSW 2620

Information on privacy and confidentiality

All submissions, including maps, received by the NSW Department of Climate Change, Energy, the Environment and Water will be reviewed and published. The department values your input and accepts that information you provide may be private and personal.

When publishing submissions, including maps, the department will make every effort to redact personal and identifying information (your name will be published if you provide us with permission to do so).

If you want your name to be treated as confidential, please indicate this by ticking the relevant box below.

Your information will be handled by the department in accordance with the [Privacy and Personal Information Protection Act 1998](#). Any personal information you provide in completing this form will only be used to inform the development of the Murrumbidgee Valley Floodplain Management Plan. We will not use or disclose the information for any other purpose, unless required or authorised to do so.

If you would like to know more about how the department meets its obligations in collecting, storing, using and sharing personal information, you can read our [Privacy statement](#) or [Privacy Management Plan](#).

If you wish to view or amend the information held by us, you can email us at floodplain.planning@dpie.nsw.gov.au, or contact the department's Information Access and Privacy Unit on 02 9860 1440 or at privacy.dcceew@environment.nsw.gov.au.

Privacy questions

Do you give permission for your name to be published with your submission? *

☒ Yes

☐ No

If you are answering on behalf of an organisation, do you give permission for your organisation's name to be published? *

☒ Yes

☐ No

☐ Not applicable

Your details

Details	
1. Given name *	T.A Field Estates PTY LTD, Wyvern Station
2. Family name *	
3. Email address *	
4. Address	Type [REDACTED]
5. Phone number	
6. Are you making this submission as an individual or as a representative of an organisation? * (Mark only one)	<input type="checkbox"/> Individual (skip to question 9) <input checked="" type="checkbox"/> Organisation
7. Name of organisation	
8. Who do you represent? *	<input type="checkbox"/> Government <input type="checkbox"/> Peak representative organisation <input type="checkbox"/> Aboriginal organisation <input type="checkbox"/> Environmental organisation <input checked="" type="checkbox"/> Irrigation industry <input type="checkbox"/> Mining industry <input checked="" type="checkbox"/> Other (please specify): Livestock
9. Have you read the <u>Draft Murrumbidgee Valley Floodplain Management Plan – Report to assist Stage 2 public exhibition?</u> *	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
10. Did/will you attend any of the following in relation to the Murrumbidgee Valley Floodplain Management Plan?	<input type="checkbox"/> An individual appointment <input type="checkbox"/> A phone call with departmental staff <input type="checkbox"/> A group meeting with departmental staff <input checked="" type="checkbox"/> None of these

The following sections relate to the feedback we are seeking on the draft floodplain management plan as described in the Report to assist public exhibition. Follow the steps on page 1 to provide feedback on the management zones shown in Figure 3.

Proposed management zones

The proposed management zones represent the hydraulic, ecological or Aboriginal cultural (or combination of) attributes of the land. Different rules and assessment criteria apply to each management zone. These reflect the nature of the area and consider the impact that a flood work may have on the movement of flood water, and risk to life and property.

For more information, please refer to Figure 3 and section 3 in the [Report to assist public exhibition](#). For a higher resolution version of the proposed management zones, see the [interactive spatial map](#).

<p>Please provide any comments you may have on the proposed management zones.</p> <p><i>(If relevant please attach a map to your submission.)</i></p>	<p>There are two irrigation area on [REDACTED] Both are south of the [REDACTED] [REDACTED] the western area is called [REDACTED] The eastern area is called [REDACTED]</p> <p>Both irrigation areas have been developed for decades and are in the inundation modeling Zone B - Map attached fo the areas.</p> <p>In the 2012 and 2022 flood events the irrigation infrastrucutre which is made up of fields, channels and roads were uneffected by the inundation water. They did not affect water height, movement direction, flow rate or neibouring areas or cultural areas. Additionally attached is a map from an aerial image of [REDACTED] showing the inundation did not reach where the modeling suggests water will reach.</p> <p>The Murrumbidgee River road has more of a impact on water Movement than both of the Irrigation areas.</p>
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Proposed rules and assessment criteria for management zone A and SP

Flood works in management zone A and SP will be restricted to specific types that are essential for the protection of life and property, or improvement of the floodplain. Each type of flood work permitted will be subject to size or height restrictions to minimise the impact on the passage of floodwater.

For more information, please refer to section 4.1.1 and Table 1 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the flood work types permitted within management zone A and SP and associated specifications.

All flood works in management zone A and SP will be assessed using the standard assessment criteria. Enhancement flood works will also be assessed using the hydraulic assessment criteria.

For more information, please refer to section 4.1.1 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for management zone A and SP.

Additional types of flood works are permitted within management zone A and SP if they were constructed prior to the commencement of the draft floodplain management plan, subject to complying with the standard assessment criteria.

For more information, please refer to section 4.1.1.2 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for existing unapproved works in management zone A and SP.

Proposed rules and assessment criteria for management zone B

Any type of flood work will be permitted in management zone B, subject to assessment using the standard assessment criteria. Larger flood works in management zone B will require advertisement and assessment using the hydraulic assessment criteria.

There is no difference in the rules and assessment criteria for flood works constructed prior to or after the draft floodplain management plan commences.

For more information, please refer to section 4.1.2, 4.2 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for management zone B.	<p>If upgrades are done to the existing irrigation design and approval is required what time frame will this approval take and what is it going to cost the land holder?</p> <p>The [REDACTED] Irrigation does not alter, reduce, the flow of flood water. The supply channels and head ditches are above 40cm, however they also act as protection for valuable infrastructure and house such as the Homestead, workshop, machinery sheds, silos and workers cottages. These channels do not negatively impact adjacent properties or reduce flood waters of ecological or cultural benefit. The current infrastructure allows access to the property and ensures people do not become isolated.</p>
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Proposed rules and assessment criteria for management zone C and CU

Any type of flood work will be permitted in management zone C and CU, subject to assessment using the standard assessment criteria. Flood works that may have a significant impact on high value infrastructure will require assessment using the hydraulic assessment criteria.

There is no difference in the rules and assessment criteria for flood works constructed prior to or after the draft floodplain management plan commences.

For more information, please refer to section 4.1.2, 4.2 and Table 2 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed rules and assessment criteria for management zone C and CU.

Proposed mandatory conditions

The draft floodplain management plan proposes three mandatory conditions that will apply to flood work approvals:

1. After a flood work is removed, the area it was located must be returned to the height of the natural surface of the ground.
2. Notice must be given to WaterNSW once a flood work is constructed.
3. Erosion must be prevented during the construction and use of a flood work.

For more information, please refer to section 5.3 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed mandatory conditions.
(If relevant please attach a map to your submission.)

Page 36 - i dont see any issues

Proposed amendment provisions

The draft floodplain management plan sets out the circumstances when the plan may be amended in the future. Of note, it proposes to amend the plan before 1 July 2028 to include rules and assessment criteria that consider the effects of climate change.

For more information, please refer to section 5.4 in the [Report to assist public exhibition](#).

Please provide any comments you may have on the proposed amendment provisions.

(If relevant please attach a map to your submission.)

Additional information

If you have any other comments on the draft floodplain management plan, please provide them here.

(If relevant please attach a map to your submission.)

If you would like to provide any additional information to help us understand your feedback, please attach this to your submission.

The following questions help us understand how effective our communication and engagement activities are in reaching our diverse community and stakeholders. This enables us to communicate more clearly and improve opportunities for everybody to have their say.

How did you hear about this consultation? *

- ☐ Community group
- ☐ Department's website
- ☐ Email or newsletter from the department
- ☐ Letter
- ☐ Newspaper advertisement
- ☐ Social media
- ☒ Word of mouth
- ☐ Other (please specify):

Do you identify as Aboriginal and/or Torres Strait Islander? *



Do you speak a language other than English at home? *



Would you like to sign up to our monthly Water newsletter to stay informed and have your say about water planning, management and reform across NSW?

- ☒ Yes
- ☐ No
- ☐ I've already subscribed

Thank you for taking the time to complete this form.

[REDACTED]

8 October 2024

Our Ref: [REDACTED]

Murrumbidgee Valley FMP
Water Group – NSW DCCEW
PO Box 189
Queanbeyan NSW 2620

Murrumbidgee Valley FMP Feedback - [REDACTED]

1. PROPOSED MANAGEMENT ZONES

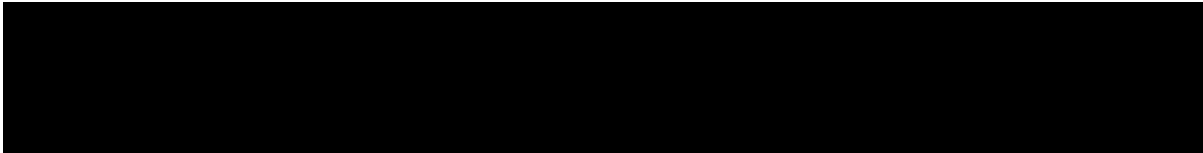
The proposed management zones and implied floodway network shows significant areas of inundation running throughout the property. These areas do not appear to consider the approvals and development. Approvals include:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Attachment A shows the property area and management zones. The extents of MZB throughout the property include existing and approved irrigation storages and developed fields. MZA does not align with existing openings in above ground supply channels.

2. PROPOSED RULES AND ASSESSMENT CRITERIA FOR MANAGEMENT ZONE A AND SP

As outlined in Section 7 an additional category of management zone should be added, Management Zone A Ill-Defined (MZAID). This would facilitate sensible routing of flows through the property, if there is a genuine hydraulic or ecological purpose for the current zones.



3. PROPOSED RULES AND ASSESSMENT CRITERIA FOR MANAGEMENT ZONE B

The proposed rules and assessment criteria for Management Zone B fail to recognise the floodplain is largely already developed. Considering the extent and age of development the allowable depth increase on adjacent landholdings once in every 50 years should be 20cm as is the case in the Lower Namoi Valley Floodplain Management Plan. A slightly larger tolerance in the allowable depth increase will significantly reduce the cost of compliance, both in terms of production area loss and construction costs without detrimental change to the natural flow distribution.

Ignoring the existing works, and proposing the same assessment criteria for works constructed prior to or after the floodplain management plan commences, does not assist practical floodplain planning. DCCEEW have an opportunity to develop a plan that meets the objectives of floodplain planning, without assuming that existing works do not exist. It is impossible to accurately represent and model developed areas of the valley without existing flood works and this should be recognised in the development of the FMP.

4. PROPOSED RULES AND ASSESSMENT CRITERIA FOR MANAGEMENT ZONE C AND CU

It is most important that works in Management Zone C do not require unnecessary assessment from WaterNSW. The “limited” circumstances where this will apply include proximity to roads which will be likely to be adjacent to almost all application areas. This alone will provide the trigger for WaterNSW to ask for assessment on all applications.

5. PROPOSED MANDATORY CONDITIONS

The proposed mandatory conditions ignore the impact that works on the floodplain may have had for a considerable period of time. The impact of removing an existing work, with or without approval may have unintended consequences up and downstream of the work.



6. PROPOSED AMENDMENT PROVISIONS

As detailed flood studies are prepared to support applications for works it is important that management zones are updated to reflect this information. A streamlined process for management zone updates to reflect approved works should be included.

7. ADDITIONAL INFORMATION

7.1 Management Zone AID

The Murrumbidgee FMP should introduce Management Zone A Ill-defined (MZAID), as used in other valleys, to ensure hydraulic and ecological connectivity without inflicting unnecessary and costly changes to existing infrastructure. The terrain within these developments has been landformed and the natural flow paths have been altered or no longer exist.

7.2 Undetermined applications

There are also no transitional provisions for applications submitted period to the adoption of the FMP. Provisions to facilitate assessment of undetermined applications should be included and should be consistent with those included in the Floodplain Management Plan for the Lower Namoi Valley Floodplain.

[REDACTED]

If there are any further clarifications or justifications required please do not hesitate to contact me.

Yours sincerely,

[REDACTED]

Attachments:

[REDACTED]

[REDACTED]

[REDACTED]

8 October 2024

Our Ref: [REDACTED]

Murrumbidgee Valley FMP
Water Group – NSW DCCEEW
PO Box 189
Queanbeyan NSW 2620

Murrumbidgee Valley FMP Feedback - [REDACTED]

1. PROPOSED MANAGEMENT ZONES

The proposed management zones and implied floodway network shows an area of inundation in the southern end of the property. This area does not appear to consider the development in this area which includes irrigation channels, fields and storages.


Attachment A shows the property area and management zones. The extents of MZB throughout [REDACTED] and neighbouring properties include existing irrigation storages and developed fields. These management do not appear to have a clear hydraulic or ecological purpose.

2. PROPOSED RULES AND ASSESSMENT CRITERIA FOR MANAGEMENT ZONE A AND SP

There are no areas of Management Zone A on [REDACTED] As outlined in Section 7 an additional category of management zone should be added, Management Zone A III-Defined (MZAID) where applicable in other areas of the valley.

3. PROPOSED RULES AND ASSESSMENT CRITERIA FOR MANAGEMENT ZONE B

The proposed rules and assessment criteria for Management Zone B fail to recognise the floodplain is largely already developed. Considering the extent and age of development the



allowable depth increase on adjacent landholdings once in every 50 years should be 20cm as is the case in the Lower Namoi Valley Floodplain Management Plan. A slightly larger tolerance in the allowable depth increase will significantly reduce the cost of compliance, both in terms of production area loss and construction costs without detrimental change to the natural flow distribution.

Ignoring the existing works, and proposing the same assessment criteria for works constructed prior to or after the floodplain management plan commences, does not assist practical floodplain planning. DCCEEW have an opportunity to develop a plan that meets the objectives of floodplain planning, without assuming that existing works do not exist. It is impossible to accurately represent and model developed areas of the valley without existing flood works and this should be recognised in the development of the FMP.

4. PROPOSED RULES AND ASSESSMENT CRITERIA FOR MANAGEMENT ZONE C AND CU

It is most important that works in Management Zone C do not require unnecessary assessment from WaterNSW. The “limited” circumstances where this will apply include proximity to roads which will be likely to be adjacent to almost all application areas. This alone will provide the trigger for WaterNSW to ask for assessment on all applications.

5. PROPOSED MANDATORY CONDITIONS

The proposed mandatory conditions ignore the impact that works on the floodplain may have had for a considerable period of time. The impact of removing an existing work, with or without approval may have unintended consequences up and downstream of the work.

6. PROPOSED AMENDMENT PROVISIONS

As detailed flood studies are prepared to support applications for works it is important that management zones are updated to reflect this information. A streamlined process for management zone updates to reflect approved works should be included.



7. ADDITIONAL INFORMATION

7.1 Management Zone AID

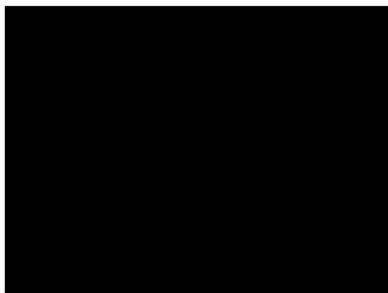
The Murrumbidgee FMP should introduce Management Zone A Ill-defined (MZAID), as used in other valleys, to ensure hydraulic and ecological connectivity without inflicting unnecessary and costly changes to existing infrastructure. The terrain within these developments has been landformed and the natural flow paths have been altered or no longer exist.

7.2 Undetermined applications

There are also no transitional provisions for applications submitted period to the adoption of the FMP. Provisions to facilitate assessment of undetermined applications should be included and should be consistent with those included in the Floodplain Management Plan for the Lower Namoi Valley Floodplain.

If there are any further clarifications or justifications required please do not hesitate to contact me.

Yours sincerely,



Attachments:



[REDACTED]

8 October 2024

Our Ref: [REDACTED]

Murrumbidgee Valley FMP
Water Group – NSW DCCEW
PO Box 189
Queanbeyan NSW 2620

Murrumbidgee Valley FMP Feedback - [REDACTED]

1. PROPOSED MANAGEMENT ZONES

The proposed management zones and implied floodway network include the majority of the developed area on [REDACTED]. This does not provide any guidance or useful framework for maintaining or improving hydraulic and ecological connectivity in an area that has been developed for irrigation for more than 50 years.

Attachment A shows the property area and management zones. The MZA on the eastern boundary of [REDACTED] does not appear to have a clear hydraulic or ecological purpose. The scattered areas of MZC in the southern areas of [REDACTED] also do not assist in maintaining or improving hydraulic and ecological connectivity. It would be significantly more beneficial to provide a floodway network that considers existing development, both approved and unapproved.

2. PROPOSED RULES AND ASSESSMENT CRITERIA FOR MANAGEMENT ZONE A AND SP

There are areas of Management Zone A on [REDACTED] that traverse existing irrigation development. As outlined in Section 7 an additional category of management zone should be added, Management Zone A III-Defined (MZAID) which would allow for maintaining or improving hydraulic and ecological connectivity whilst facilitating sensible changes to existing development.

3. PROPOSED RULES AND ASSESSMENT CRITERIA FOR MANAGEMENT ZONE B

The proposed rules and assessment criteria for Management Zone B fail to recognise the floodplain is largely already developed. Considering the extent and age of development the allowable depth increase on adjacent landholdings once in every 50 years should be 20cm as is the case in the Lower Namoi Valley Floodplain Management Plan. A slightly larger tolerance in the allowable depth increase will significantly reduce the cost of compliance, both in terms of production area loss and construction costs without detrimental change to the natural flow distribution.

Ignoring the existing works, and proposing the same assessment criteria for works constructed prior to or after the floodplain management plan commences, does not assist practical floodplain planning. DCCEEW have an opportunity to develop a plan that meets the objectives of floodplain planning, without assuming that existing works do not exist. It is impossible to accurately represent and model developed areas of the valley without existing flood works and this should be recognised in the development of the FMP.

4. PROPOSED RULES AND ASSESSMENT CRITERIA FOR MANAGEMENT ZONE C AND CU

It is most important that works in Management Zone C do not require unnecessary assessment from WaterNSW. The “limited” circumstances where this will apply include proximity to roads which will be likely to be adjacent to almost all application areas. This alone will provide the trigger for WaterNSW to ask for assessment on all applications.

5. PROPOSED MANDATORY CONDITIONS

The proposed mandatory conditions ignore the impact that works on the floodplain may have had for a considerable period of time. The impact of removing an existing work, with or without approval may have unintended consequences up and downstream of the work.



6. PROPOSED AMENDMENT PROVISIONS

As detailed flood studies are prepared to support applications for works it is important that management zones are updated to reflect this information. A streamlined process for management zone updates to reflect approved works should be included.

7. ADDITIONAL INFORMATION

7.1 Management Zone AID

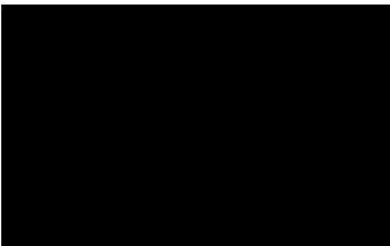
The Murrumbidgee FMP should introduce Management Zone A Ill-defined (MZAID), as used in other valleys, to ensure hydraulic and ecological connectivity without inflicting unnecessary and costly changes to existing infrastructure. The terrain within these developments has been landformed and the natural flow paths have been altered or no longer exist.

7.2 Undetermined applications

There are also no transitional provisions for applications submitted period to the adoption of the FMP. Provisions to facilitate assessment of undetermined applications should be included and should be consistent with those included in the Floodplain Management Plan for the Lower Namoi Valley Floodplain.

If there are any further clarifications or justifications required please do not hesitate to contact me.

Yours sincerely,



Attachments:



[REDACTED]

8 October 2024

Our Ref: [REDACTED]

Murrumbidgee Valley FMP
Water Group – NSW DCCEW
PO Box 189
Queanbeyan NSW 2620

Murrumbidgee Valley FMP Feedback - [REDACTED]


1. PROPOSED MANAGEMENT ZONES

The proposed management zones and implied floodway network include a significant flow path through [REDACTED]. This flow path includes a MZA which runs through developed [REDACTED]. The apparent indiscriminate routing does not provide any guidance or useful framework for maintaining or improving hydraulic and ecological connectivity in an area that has been developed for irrigation for more than 50 years.

It would be significantly more beneficial to provide a floodway network that considers existing development, both approved and unapproved.

2. PROPOSED RULES AND ASSESSMENT CRITERIA FOR MANAGEMENT ZONE A AND SP

There are areas of Management Zone A on [REDACTED] that traverse [REDACTED]. As outlined in Section 7 an additional category of management zone should be added, Management Zone A III-Defined (MZAID) which would allow for maintaining or improving hydraulic and ecological connectivity whilst facilitating reasonable existing development to be retained.



3. PROPOSED RULES AND ASSESSMENT CRITERIA FOR MANAGEMENT ZONE B

The proposed rules and assessment criteria for Management Zone B fail to recognise the floodplain is largely already developed. Considering the extent and age of development the allowable depth increase on adjacent landholdings once in every 50 years should be 20cm as is the case in the Lower Namoi Valley Floodplain Management Plan. A slightly larger tolerance in the allowable depth increase will significantly reduce the cost of compliance, both in terms of production area loss and construction costs without detrimental change to the natural flow distribution.

Ignoring the existing works, and proposing the same assessment criteria for works constructed prior to or after the floodplain management plan commences, does not assist practical floodplain planning. DCCEEW have an opportunity to develop a plan that meets the objectives of floodplain planning, without assuming that existing works do not exist. It is impossible to accurately represent and model developed areas of the valley without existing flood works and this should be recognised in the development of the FMP.

4. PROPOSED RULES AND ASSESSMENT CRITERIA FOR MANAGEMENT ZONE C AND CU

It is most important that works in Management Zone C do not require unnecessary assessment from WaterNSW. The “limited” circumstances where this will apply include proximity to roads which will be likely to be adjacent to almost all application areas. This alone will provide the trigger for WaterNSW to ask for assessment on all applications.

5. PROPOSED MANDATORY CONDITIONS

The proposed mandatory conditions ignore the impact that works on the floodplain may have had for a considerable period of time. The impact of removing an existing work, with or without approval may have unintended consequences up and downstream of the work.



6. PROPOSED AMENDMENT PROVISIONS

As detailed flood studies are prepared to support applications for works it is important that management zones are updated to reflect this information. A streamlined process for management zone updates to reflect approved works should be included.

7. ADDITIONAL INFORMATION

7.1 Management Zone AID

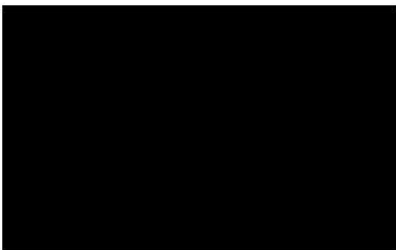
The Murrumbidgee FMP should introduce Management Zone A Ill-defined (MZAID), as used in other valleys, to ensure hydraulic and ecological connectivity without inflicting unnecessary and costly changes to existing infrastructure. The terrain within these developments has been landformed and the natural flow paths have been altered or no longer exist.

7.2 Undetermined applications

There are also no transitional provisions for applications submitted period to the adoption of the FMP. Provisions to facilitate assessment of undetermined applications should be included and should be consistent with those included in the Floodplain Management Plan for the Lower Namoi Valley Floodplain.

If there are any further clarifications or justifications required please do not hesitate to contact me.

Yours sincerely,



Attachments:



[REDACTED]

8 October 2024

Our Ref: [REDACTED]

Murrumbidgee Valley FMP
Water Group – NSW DCCEEW
PO Box 189
Queanbeyan NSW 2620

Murrumbidgee Valley FMP Feedback - [REDACTED]

1. PROPOSED MANAGEMENT ZONES

The proposed management zones and implied floodway network designate the majority of [REDACTED] as MZB. There is one dead end MZA which runs into the property but does not appear to have any hydraulic or ecological connectivity function. There are also MZA's at the north of the farm that include high value infrastructure including sheds and houses.

It would be significantly more beneficial to provide guidance for a floodway network that considers existing development, both approved and unapproved on the properties in this area which have significant areas of contiguous development.

2. PROPOSED RULES AND ASSESSMENT CRITERIA FOR MANAGEMENT ZONE A AND SP

There are areas of Management Zone A on [REDACTED] As outlined in Section 7 an additional category of management zone should be added, Management Zone A III-Defined (MZAID) which would allow for maintaining or improving hydraulic and ecological connectivity whilst facilitating reasonable existing development to be retained.

3. PROPOSED RULES AND ASSESSMENT CRITERIA FOR MANAGEMENT ZONE B

The proposed rules and assessment criteria for Management Zone B fail to recognise the floodplain is largely already developed. Considering the extent and age of development the allowable depth increase on adjacent landholdings once in every 50 years should be 20cm as is the case in the Lower Namoi Valley Floodplain Management Plan. A slightly larger tolerance in the allowable depth increase will significantly reduce the cost of compliance, both in terms of production area loss and construction costs without detrimental change to the natural flow distribution.

Ignoring the existing works, and proposing the same assessment criteria for works constructed prior to or after the floodplain management plan commences, does not assist practical floodplain planning. DCCEEW have an opportunity to develop a plan that meets the objectives of floodplain planning, without assuming that existing works do not exist. It is impossible to accurately represent and model developed areas of the valley without existing flood works and this should be recognised in the development of the FMP.

4. PROPOSED RULES AND ASSESSMENT CRITERIA FOR MANAGEMENT ZONE C AND CU

It is most important that works in Management Zone C do not require unnecessary assessment from WaterNSW. The “limited” circumstances where this will apply include proximity to roads which will be likely to be adjacent to almost all application areas. This alone will provide the trigger for WaterNSW to ask for assessment on all applications.

5. PROPOSED MANDATORY CONDITIONS

The proposed mandatory conditions ignore the impact that works on the floodplain may have had for a considerable period of time. The impact of removing an existing work, with or without approval may have unintended consequences up and downstream of the work.



6. PROPOSED AMENDMENT PROVISIONS

As detailed flood studies are prepared to support applications for works it is important that management zones are updated to reflect this information. A streamlined process for management zone updates to reflect approved works should be included.

7. ADDITIONAL INFORMATION

7.1 Management Zone AID

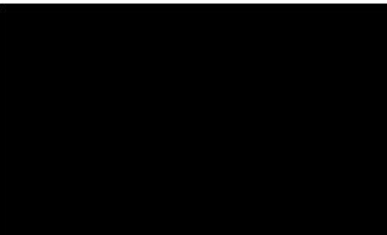
The Murrumbidgee FMP should introduce Management Zone A Ill-defined (MZAID), as used in other valleys, to ensure hydraulic and ecological connectivity without inflicting unnecessary and costly changes to existing infrastructure. The terrain within these developments has been landformed and the natural flow paths have been altered or no longer exist.

7.2 Undetermined applications

There are also no transitional provisions for applications submitted period to the adoption of the FMP. Provisions to facilitate assessment of undetermined applications should be included and should be consistent with those included in the Floodplain Management Plan for the Lower Namoi Valley Floodplain.

If there are any further clarifications or justifications required please do not hesitate to contact me.

Yours sincerely,



Attachments:



[REDACTED]

9 October 2024

Our Ref: [REDACTED]

Murrumbidgee Valley FMP
Water Group – NSW DCCEEW
PO Box 189
Queanbeyan NSW 2620

Murrumbidgee Valley FMP Feedback - [REDACTED]

1. PROPOSED MANAGEMENT ZONES

The proposed management zones and implied floodway network show significant areas of inundation running throughout the property. These management zones appear to have ignored the existing approvals:

- [REDACTED]
- [REDACTED]

Attachment A shows the property area and management zones. The existing approved works are clearly not considered in the determination of the management zones and this needs to be rectified. There also appears to be a dual classification of the storage being mapped MZC & MZB. This area should be MZC.

Management Zone delineation is clearly influenced by existing development, with or without approval. This is obvious where zone changes follow field boundaries. This is likely due to the challenges in preparing a Digital Elevation Model for the no development model run. Existing developed areas should default to Management Zone C unless hydraulic or ecological connectivity is required through the area.

2. PROPOSED RULES AND ASSESSMENT CRITERIA FOR MANAGEMENT ZONE A AND SP

Areas of MZA on [REDACTED] traverse existing approvals. This must be rectified.

It is also recommended that where existing works block a proposed Management Zone A it be reclassified as Management Zone A Ill-Defined (MZAID). This will allow sensible modifications to development and ensure hydraulic and ecological connectivity is maintained.


3. PROPOSED RULES AND ASSESSMENT CRITERIA FOR MANAGEMENT ZONE B

The proposed rules and assessment criteria for Management Zone B fail to recognise the floodplain is largely already developed. Considering the extent and age of development the allowable depth increase on adjacent landholdings once in every 50 years should be 20cm as is the case in the Lower Namoi Valley Floodplain Management Plan. A slightly larger tolerance in the allowable depth increase will significantly reduce the cost of compliance, both in terms of production area loss and construction costs without detrimental change to the natural flow distribution.

Ignoring the existing works, and proposing the same assessment criteria for works constructed prior to or after the floodplain management plan commences, does not assist practical floodplain planning. DCCEEW have an opportunity to develop a plan that meets the objectives of floodplain planning, without assuming that existing works do not exist. It is impossible to accurately represent and model developed areas of the valley without existing flood works and this should be recognised in the development of the FMP.

4. PROPOSED RULES AND ASSESSMENT CRITERIA FOR MANAGEMENT ZONE C AND CU

It is most important that works in Management Zone C do not require unnecessary assessment from WaterNSW. The “limited” circumstances where this will apply include



proximity to roads which will are likely to be adjacent to almost all application areas. This alone will provide the trigger for WaterNSW to ask for assessment on all applications.

5. PROPOSED MANDATORY CONDITIONS

The proposed mandatory conditions ignore the impact that works on the floodplain may have had for a considerable period of time. The impact of removing an existing work, with or without approval may have unintended consequences up and downstream of the work.

6. PROPOSED AMENDMENT PROVISIONS

As detailed flood studies are prepared to support applications for works it is important that management zones are updated to reflect this information. A streamlined process for management zone updates to reflect approved works should be included.

7. ADDITIONAL INFORMATION

7.1 Management Zone AID

The Murrumbidgee FMP should introduce Management Zone A Ill-defined (MZAID), as used in other valleys, to ensure hydraulic and ecological connectivity without inflicting unnecessary and costly changes to existing infrastructure. The terrain within these developments has been landformed and the natural flow paths have been altered or no longer exist.

7.2 Undetermined applications

There are also no transitional provisions for applications submitted period to the adoption of the FMP. Provisions to facilitate assessment of undetermined applications should be included and should be consistent with those included in the Floodplain Management Plan for the Lower Namoi Valley Floodplain.

[REDACTED]

If there are any further clarifications or justifications required please do not hesitate to contact me.

Yours sincerely,

[REDACTED]

[REDACTED]

Attachments:

[REDACTED]

[REDACTED]

9 October 2024

Our Ref: [REDACTED]

Murrumbidgee Valley FMP
Water Group – NSW DCCEEW
PO Box 189
Queanbeyan NSW 2620

Murrumbidgee Valley FMP Feedback [REDACTED]

1. PROPOSED MANAGEMENT ZONES

The proposed management zones and implied floodway network shows a significant area of inundation running throughout the property. This area does not appear to consider the development in this area which includes irrigation fields and storages.

Attachment A shows the property area and management zones. The extents of MZB throughout the property include existing irrigation storages and developed fields. The management zones also appear to follow irrigation channels in some areas without a clear hydraulic or ecological purpose.

2. PROPOSED RULES AND ASSESSMENT CRITERIA FOR MANAGEMENT ZONE A AND SP

The Management Zone A on [REDACTED] intercepts existing infrastructure and at times appears to follow irrigation channels. As outlined in Section 7 an additional category of management zone should be added, Management Zone A III-Defined (MZAID). This would facilitate sensible routing of flows through the property, if there is a genuine hydraulic or ecological purpose for the current zones.

3. PROPOSED RULES AND ASSESSMENT CRITERIA FOR MANAGEMENT ZONE B

The proposed rules and assessment criteria for Management Zone B fail to recognise the floodplain is largely already developed. Considering the extent and age of development the allowable depth increase on adjacent landholdings once in every 50 years should be 20cm as is the case in the Lower Namoi Valley Floodplain Management Plan. A slightly larger tolerance in the allowable depth increase will significantly reduce the cost of compliance, both in terms of production area loss and construction costs without detrimental change to the natural flow distribution.

Ignoring the existing works, and proposing the same assessment criteria for works constructed prior to or after the floodplain management plan commences, does not assist practical floodplain planning. DCCEEW have an opportunity to develop a plan that meets the objectives of floodplain planning, without assuming that existing works do not exist. It is impossible to accurately represent and model developed areas of the valley without existing flood works and this should be recognised in the development of the FMP.

4. PROPOSED RULES AND ASSESSMENT CRITERIA FOR MANAGEMENT ZONE C AND CU

It is most important that works in Management Zone C do not require unnecessary assessment from WaterNSW. The “limited” circumstances where this will apply include proximity to roads which will be likely to be adjacent to almost all application areas. This alone will provide the trigger for WaterNSW to ask for assessment on all applications.

5. PROPOSED MANDATORY CONDITIONS

The proposed mandatory conditions ignore the impact that works on the floodplain may have had for a considerable period of time. The impact of removing an existing work, with or without approval may have unintended consequences up and downstream of the work.

6. PROPOSED AMENDMENT PROVISIONS

As detailed flood studies are prepared to support applications for works it is important that management zones are updated to reflect this information. A streamlined process for management zone updates to reflect approved works should be included.

7. ADDITIONAL INFORMATION

7.1 Management Zone AID

The Murrumbidgee FMP should introduce Management Zone A Ill-defined (MZAID), as used in other valleys, to ensure hydraulic and ecological connectivity without inflicting unnecessary and costly changes to existing infrastructure. The terrain within these developments has been landformed and the natural flow paths have been altered or no longer exist.

7.2 Undetermined applications

There are also no transitional provisions for applications submitted period to the adoption of the FMP. Provisions to facilitate assessment of undetermined applications should be included and should be consistent with those included in the Floodplain Management Plan for the Lower Namoi Valley Floodplain.

7.3 Mapping Errors

There appears to be errors in the map layers used to locate flood dependant ecological assets and flood dependant ecosystems. Attachment B shows the Floodplain ecosystems mapped on [REDACTED] with a significant number of old rice fields mapped incorrectly as floodplain ecosystems.

[REDACTED]

If there are any further clarifications or justifications required please do not hesitate to contact me.

Yours sincerely,

[REDACTED]

Attachments:

[REDACTED]

9 October 2024

Our Ref:

Murrumbidgee Valley FMP
Water Group – NSW DCCEEW
PO Box 189
Queanbeyan NSW 2620

Murrumbidgee Valley FMP Feedback -

1. PROPOSED MANAGEMENT ZONES

The proposed management zones and implied floodway network shows a significant area of inundation running through the centre of the property. This area does not appear to consider the development in this area which includes:

- Irrigation infrastructure and orchard development
- Upstream and downstream development

Irrigation development on in the area shown to be within the inundation area, was developed prior to 1977.

Attachment A shows the property area and management zones. For the proposed Management Zone B running through the centre of the property to provide passage for drainage or floodwater it would need to be a coordinated project with neighbouring properties. The floodplain management plan does not appear to provide an avenue for this cooperative approach.

Management Zone delineation is clearly influenced by existing development, with or without approval. This is obvious where zone changes follow field boundaries. This is likely due to the challenges in preparing a Digital Elevation Model for the no development model run. Existing developed areas should default to Management Zone C unless hydraulic or ecological connectivity is required through the area.

2. PROPOSED RULES AND ASSESSMENT CRITERIA FOR MANAGEMENT ZONE A AND SP

There are no areas of Management Zone A on [REDACTED]. As outlined in Section 7 an additional category of management zone should be added, Management Zone A III-Defined (MZAID) where applicable in other areas of the valley.

3. PROPOSED RULES AND ASSESSMENT CRITERIA FOR MANAGEMENT ZONE B

The proposed rules and assessment criteria for Management Zone B fail to recognise the floodplain is largely already developed. Considering the extent and age of development the allowable depth increase on adjacent landholdings once in every 50 years should be 20cm as is the case in the Lower Namoi Valley Floodplain Management Plan. A slightly larger tolerance in the allowable depth increase will significantly reduce the cost of compliance, both in terms of production area loss and construction costs without detrimental change to the natural flow distribution.

Ignoring the existing works, and proposing the same assessment criteria for works constructed prior to or after the floodplain management plan commences, does not assist practical floodplain planning. DCCEEW have an opportunity to develop a plan that meets the objectives of floodplain planning, without assuming that existing works do not exist. It is impossible to accurately represent and model developed areas of the valley without existing flood works and this should be recognised in the development of the FMP.

4. PROPOSED RULES AND ASSESSMENT CRITERIA FOR MANAGEMENT ZONE C AND CU

It is most important that works in Management Zone C do not require unnecessary assessment from WaterNSW. The “limited” circumstances where this will apply include proximity to roads which will be likely to be adjacent to almost all application areas. This alone will provide the trigger for WaterNSW to ask for assessment on all applications.



5. PROPOSED MANDATORY CONDITIONS

The proposed mandatory conditions ignore the impact that works on the floodplain may have had for a considerable period of time. The impact of removing an existing work, with or without approval may have unintended consequences up and downstream of the work.

6. PROPOSED AMENDMENT PROVISIONS

As detailed flood studies are prepared to support applications for works it is important that management zones are updated to reflect this information. A streamlined process for management zone updates to reflect approved works should be included.

7. ADDITIONAL INFORMATION

7.1 Management Zone AID

The Murrumbidgee FMP should introduce Management Zone A III-defined (MZAID), as used in other valleys, to ensure hydraulic and ecological connectivity without inflicting unnecessary and costly changes to existing infrastructure. The terrain within these developments has been landformed and the natural flow paths have been altered or no longer exist.

7.2 Undetermined applications

There are also no transitional provisions for applications submitted period to the adoption of the FMP. Provisions to facilitate assessment of undetermined applications should be included and should be consistent with those included in the Floodplain Management Plan for the Lower Namoi Valley Floodplain.

[REDACTED]

If there are any further clarifications or justifications required please do not hesitate to contact me.

Yours sincerely,

[REDACTED]

Attachments:

[REDACTED]

[REDACTED]

9 October 2024

Our Ref: [REDACTED]

Murrumbidgee Valley FMP
Water Group – NSW DCCEEW
PO Box 189
Queanbeyan NSW 2620

Murrumbidgee Valley FMP Feedback - [REDACTED]

1. PROPOSED MANAGEMENT ZONES

The proposed management zones and implied floodway network shows 2 significant areas of inundation running through the property. This area does not appear to consider the development in this area which includes:

- Irrigation infrastructure across the ~875 hectare, state of the art, orchard
- Irrigation storage approved in 2019 through [REDACTED] with Murrumbidgee Council
- High value improvements including ~300,000 almond trees, new buildings, dwellings, solar panels, frost fans and sheds
- Impacts of major roads, particularly the [REDACTED]

Irrigation development on [REDACTED] in the area shown to be within the inundation area, was developed prior to 1987.

Attachment A shows the property area and management zones. There does not appear to be any hydraulic or ecological basis for the area of MZ B in the northern area of the property.

The MZB passing through the property from east to west appears to ignore upstream irrigation development, development on [REDACTED]

2. PROPOSED RULES AND ASSESSMENT CRITERIA FOR MANAGEMENT ZONE A AND SP

There are no areas of Management Zone A on [REDACTED]. As outlined in Section 7 an additional category of management zone should be added, Management Zone A III-Defined (MZAID) where applicable in other areas of the valley.

3. PROPOSED RULES AND ASSESSMENT CRITERIA FOR MANAGEMENT ZONE B

The proposed rules and assessment criteria for Management Zone B fail to recognise the floodplain is largely already developed. Considering the extent and age of development the allowable depth increase on adjacent landholdings once in every 50 years should be 20cm as is the case in the Lower Namoi Valley Floodplain Management Plan. A slightly larger tolerance in the allowable depth increase will significantly reduce the cost of compliance, both in terms of production area loss and construction costs without detrimental change to the natural flow distribution.

Ignoring the existing works, and proposing the same assessment criteria for works constructed prior to or after the floodplain management plan commences, does not assist practical floodplain planning. DCCEE have an opportunity to develop a plan that meets the objectives of floodplain planning, without assuming that existing works do not exist. It is impossible to accurately represent and model developed areas of the valley without existing flood works and this should be recognised in the development of the FMP.

4. PROPOSED RULES AND ASSESSMENT CRITERIA FOR MANAGEMENT ZONE C AND CU

It is most important that works in Management Zone C do not require unnecessary assessment from WaterNSW. The “limited” circumstances where this will apply include proximity to roads which will be likely to be adjacent to almost all application areas. This alone will provide the trigger for WaterNSW to ask for assessment on all applications.



5. PROPOSED MANDATORY CONDITIONS

The proposed mandatory conditions ignore the impact that works on the floodplain may have had for a considerable period of time. The impact of removing an existing work, with or without approval may have unintended consequences up and downstream of the work.

6. PROPOSED AMENDMENT PROVISIONS

As detailed flood studies are prepared to support applications for works it is important that management zones are updated to reflect this information. A streamlined process for management zone updates to reflect approved works should be included.

7. ADDITIONAL INFORMATION

7.1 Management Zone AID

The Murrumbidgee FMP should introduce Management Zone A III-defined (MZAID), as used in other valleys, to ensure hydraulic and ecological connectivity without inflicting unnecessary and costly changes to existing infrastructure. The terrain within these developments has been landformed and the natural flow paths have been altered or no longer exist.

7.2 Undetermined applications

There are also no transitional provisions for applications submitted prior to the adoption of the FMP. Provisions to facilitate assessment of undetermined applications should be included and should be consistent with those included in the Floodplain Management Plan for the Lower Namoi Valley Floodplain.

[REDACTED]

If there are any further clarifications or justifications required please do not hesitate to contact me.

Yours sincerely,

[REDACTED]

Attachments:

[REDACTED]

9.4. Draft Floodplain Management Plan for the Murrumbidgee Floodplain 2025

Author: [REDACTED]

Summary

The Floodplain Management Plan for the Murrumbidgee Valley Floodplain 2025 was on exhibition over August and September 2024, a request was made to the Department of Climate Change, Energy, the Environment and Water to allow a late submission to be provided given the timing of NSW Local Government Elections. This request was granted. The report outlines the concerns for landuse and floodplain management on council's community(s) and council infrastructure.

Recommendation

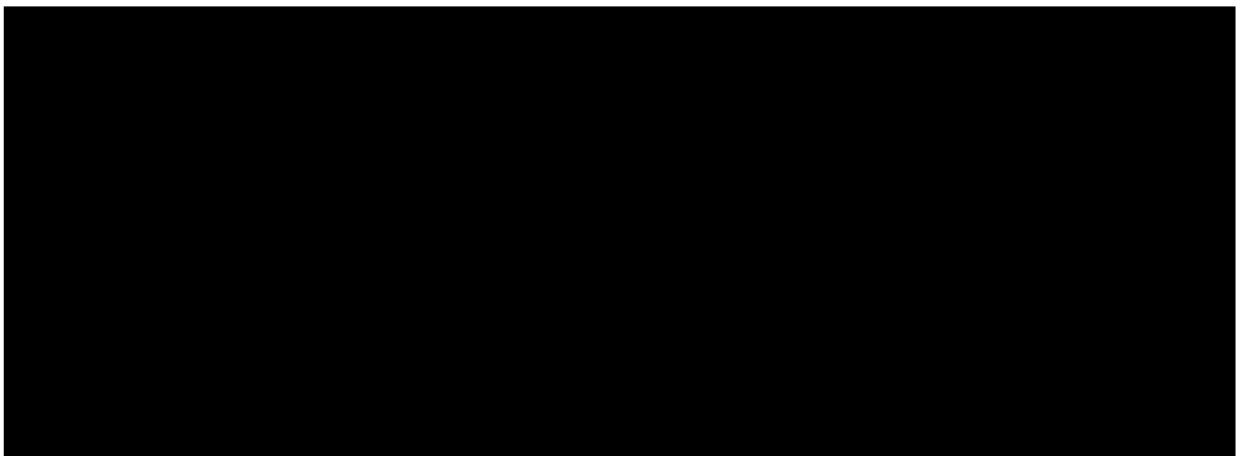
1. THAT [REDACTED] note the report on the Floodplain Management Plan for the Murrumbidgee Valley Floodplain 2025; and
2. THAT the report be [REDACTED] formal submission regarding the Floodplain Management Plan for the Murrumbidgee Valley Floodplain 2025.

Background

Under the Water Management Act 2000 Floodplain Management Plans are being prepared across the State. The Floodplain Management Plan for the Murrumbidgee Valley Floodplain 2025 was exhibited over August and September 2025.

The plan covers the north western part of the council area with [REDACTED] only settlement covered in the plan being Morundah with the remainder of the area rural land.

Below is the extent of the managed area under the plan.



After reviewing the plan the following matters are highlighted for consideration by the Department to Change to ensure that the floodplain can operate as naturally as possible while maintaining life and property, plus ensuring consistency for emergency services and local authorities.

1. Extent of Floodplain Area in Morundah
Ensure the flood management area around Morundah match the extend of the area matched the [REDACTED] Floodplain Risk Management Study and Plan prepared by [REDACTED] in 2022 for [REDACTED] to ensure consistency in the management of the floodplain areas by the relevant authorities.
2. Colombo Creek northern area not referenced in parts of the plan.
Both the Yanko and Colombo Creeks flow through the northern area of proposed plan and this needs to be reflected in the plan i.e. Page 9 clause 11 (2) under the heading nature.

3. Clause 21 defines the number of flood work approvals.
[REDACTED] request access to information to the location and details of the works. Also can the plan identify that works are limited by the Water Management (General) Regulation 2018 limits earthwork construction to 150mm above natural ground level. Also that the plan clearly defined which departments are responsible for the approval of works and which agency is responsible for compliance issues for structures constructed without approval. This information will also ensure that [REDACTED] maintains approvals for any relevant assets, such as flood protection levees.
4. Protection of Community Infrastructure i.e. public roads
The overall plan does not address public assets, in particular those under the care and control of local Councils most notably local roads. [REDACTED] request that at a minimum:
(a) that the definition of infrastructure protection work on page 22, Clause 35 include public infrastructure roads.
Reason: In past floods property owners have diverted water from their assets (crops and paddocks) onto local roads causing significant damage to local road networks making parts of the road network unusable by the public for significant periods of time.

Please ensure that the plan is consistent with the limitations listed in the Act and Regulations. The plan has some inconsistencies with the regulation most notably Subdivision 6 where numerical standards have been included. Copy of the Subdivision is provided.

Subdivision 6 Exemption from requirement for flood work approval

45 Definition

In this Division -

designated high risk flood area means -

- (a) a recognised floodway that is designated by a converted floodplain management plan, or*
- (b) an area of a floodplain that is within Management Zone A or D under a management plan that applies to the floodplain.*

46 Exemption relating to compliance with State emergency direction

- (1) A person is exempt from section 91D(1) of the Act if the person constructs, uses or modifies a flood work in compliance with a direction given under the [State Emergency and Rescue Management Act 1989](#) or [State Emergency Service Act 1989](#).*
- (2) An exemption conferred by subclause (1) ceases to apply 3 months after the date on which the direction was given or such later date as the Minister may approve of in writing.*

47 Exemption relating to work carried out by determining authorities or under development authorisations

- (1) A determining authority is exempt from section 91D(1) of the Act in relation to the construction or use of a flood work if -*
 - (a) the construction or use of the work is permitted to be carried out by the determining*

authority under the [Environmental Planning and Assessment Act 1979](#) (whether or not under a development authorisation), and

(b) the work is situated in or on

(i) a place that is located within a managed designated high risk flood area, or

(ii) any other place (unless it is located within an unmanaged designated high risk flood area).

(2) A person (other than a determining authority) is exempt from section 91D(1) of the Act in relation to the construction or use of a flood work on a landholding that is owned or occupied by the person if -

(a) the construction or use of the work is carried out under a development authorisation, and

(b) the work is situated in or on

(i) a place that is located within a managed designated high risk flood area, or

(ii) any other place (unless it is located within an unmanaged designated high risk flood area), and

(c) the total area of the landholding does not exceed 0.2 hectare.

Note -

Section 5.7 of the [Environmental Planning and Assessment Act 1979](#) makes provision with respect to environmental impact assessments before carrying out, or approving the carrying out of, certain activities.

(3) In this clause -

determining authority has the same meaning as in Division 5.1 of Part 5 of the [Environmental Planning and Assessment Act 1979](#).

development authorisation means -

(a) development consent within the meaning of the [Environmental Planning and Assessment Act 1979](#), or

(b) approval within the meaning of Division 5.1 of Part 5 of the [Environmental Planning and Assessment Act 1979](#).

managed designated high risk flood area means a designated high risk flood area to which a floodplain risk management plan or floodplain risk management study applies (being a plan or study that has been developed and implemented by a local council in accordance with the Floodplain Development Manual 2005, or a replacement manual, notified under section 733 of the [Local Government Act 1993](#)).

unmanaged designated high risk flood area means a designated high risk flood area other than a managed designated high risk flood area.

infrastructure

A person is exempt from section 91D(1) of the Act if -

- (a) the person constructs or uses on the person's land a flood work consisting of -
 - (i) one or more ring embankments that enclose a dwelling house, shed or storage silo, or
 - (ii) one or more partial ring embankments that, together with the slope of land, enclose a dwelling house, shed or storage silo, and
- (b) the area (or total area) enclosed does not exceed 2 hectares or 10% of the area of the person's land, whichever is the lesser, and
- (c) the work is not situated in or on a place that is located within a designated high risk flood area.

49 Exemptions relating to certain public authorities

- (1) NSW Trains, Sydney Trains and the Residual Transport Corporation are exempt from section 91D(1) of the Act for the construction or use of a flood work for the purposes of a railway.
- (2) A roads authority for a public road (within the meaning of the [Roads Act 1993](#)) is exempt from section 91D(1) of the Act if it constructs or uses a flood work for the purposes of the public road.

50 Exemption relating to certain earthworks

A person is exempt from section 91D(1) of the Act if -

- (a) the person constructs or uses a flood work that consists of earthworks (including farm tracks and check banks) that are less than 150 millimetres above (but not below) the natural surface of the ground in or on which it is constructed or situated, and
- (b) the work is not situated in or on a place that is located within a designated high risk flood area.

Community Engagement

The plan was exhibited for public comment in August and September 2024 by the Department of Climate Change, Energy, the Environment and Water.

Attachments

None

Links to

Theme:

Goals

- 1.1 Maintain and Improve roads, bridges and footpaths to meet the needs of residents and industry.
- 1.5 Maintain and improve stormwater and flood protection systems to meet the needs of residents and industry.

Financial Implications

No direct financial implications from making a submission

Financial Sustainability

NA

Risk Implications

By not making a submission the role [REDACTED] is required to play in floodplain management could be overlooked and significant asset classes may not be covered by the plan.

Legal Implications

The Floodplain Management Plan for the Murrumbidgee Valley Floodplain 2025 has been prepared in accordance with the Water Management Act 2000 and will be statutory instrument once formally made.

Options

1. Make a submission - recommended to ensure the interests of the community and [REDACTED] role in the management of the floodplain is consistent.
2. Not make a submission