

**Nepean River Floodplain Risk Management Study  
and Plan  
Public Exhibition Submission**

**Nepean River Floodplain Risk Management Study  
and Plan**

**Public Exhibition Submission**

**02\_Submission 1\_Attachment 1**

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# **SUBMISSION FORM - Flood Risk Management Policy Form Submission**

There has been a submission of the form SUBMISSION FORM - Flood Risk Management Policy through your Your Voice Camden website.

## **What is the nature of your submission?**

Provide information or suggested amendments for consideration

## **Use this space to record your submission:**

Part 3 – Nepean River

Due to flood behaviour and climate change impacts the risk of flooding from the Nepean River is far greater. Due to this risk, I believe it is vital that dredging of the Nepean River flooring would provide substantial positives in reducing the risk to property damage within the Camden area.

In addition, I believe establishing a Voluntary House Raising Scheme as part of the Floodplain Risk Management Plan would allow residents to reduce the risk of damage to their property and possessions.

## **Are you making a submission on behalf of a public agency, organisation or community group?**

No

**First Name**

**Last Name**

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**Email:**

**Phone:**

**Street Address:**

**Postal Address:**

as above

To view all of this form's submissions, visit

[https://yourvoice.camden.nsw.gov.au/index.php/dashboard/reports/forms\\_new/data/129](https://yourvoice.camden.nsw.gov.au/index.php/dashboard/reports/forms_new/data/129)

**Nepean River Floodplain Risk Management Study  
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**02\_Submission 2\_Attachment 1, 2, 3, &4**

The report's other recommendations include:

- Investing in resilience measures, including infrastructure projects to improve disaster resilience and adaptation of individual homes
- Direct subsidies for insurance and/or resilience measures for vulnerable households
- Better building standards, improved land use and planning, and avoiding development in high-risk areas such as flood zones
- Relocating people and buildings if mitigation and adaptation is not an option
- Better information on the impacts of climate change, including a public database with insurance affordability, exposure and vulnerability data
- Consulting closely with First Nations Australians on nature-based solutions to adaptation and mitigation.





**Warning - This email originates from an external organisation**

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Good morning,

As this is a huge document for the average person to understand, I have approached this from the perspective of a long time concerned resident.

Please note the attached document are notes from the NSW Flood Report re the Lismore Floods as reported in the news.

As well, last night I heard the **NSW Premier state "No more building on Flood Plains, it ends now"**.

**In relation to any development on Flood Plains in the Camden LGA, I don't believe it could be put more succinctly.**

The below areas are very confusing and inconclusive.

There are 3 categories of concessional development in 7.3.7

- **Concessional development in the case of commercial and residential (low, medium or high density) development:**
- **Concessional development in the case of other development:**
- **Concessional development in the case of development within the Camden Heritage Conservation Precinct:** a) All Commercial and Industrial, Low, Medium and High-Density Residential developments (as categorised in this policy) located only within the Camden Heritage Conservation Precinct shown in Figure 3 of the Appendix 1.

Lastly, I would like to know how Council intend to clear up and fix the large scale destruction of the river bank and the loss of big healthy trees which were holding the river bank. Along with preservation of any trees and river bank that are in danger of further collapse (see above photos). Many facilities well used by the public are still closed in Camden ie: The Llewellyn Davis Walk Way and the Equestrian Centre to name a few.

No more building on Flood Plains.

Kind regards



**Nepean River Floodplain Risk Management Study  
and Plan**

**Public Exhibition Submission**

**02\_Submission 3\_Attachment 1**

18<sup>th</sup> August 2022  
General Manager  
Camden Council  
PO Box 183  
CAMDEN NSW 2570

**RE: Floodplain Management Exhibition**

Thank you for the opportunity to comment on this exhibition. We wish to lodge our concern regarding potential development in flood prone areas of Camden Township, and we object to the inclusion of any wide-ranging concessional development clause for the Camden Heritage Conservation Area. We ask for deletion of the concessional clause for the Camden Heritage Conservation Area, and that any clause in the flood management plans permitting new development in the flood prone areas of the Camden Heritage Conservation Area be removed.

It is unclear from the documents provided what is intended by “concessional” development in Camden Township and the Heritage Conservation Area. While we support any work to preserve historic buildings and places, and minor alterations to enable their adaptive reuse, we cannot support any new development within the more flood prone areas of Camden township. It is clear from the flood studies that all of Edward and Exeter Streets, most of Elizabeth Street, and parts of Mitchell and Argyle Streets, are all highly flood prone (exceeding 5%AEP and including high risk areas). There should not be any new constructions or substantial additions allowed in these areas. We support the recent statements by the NSW State Government that the time for allowing development in flood prone areas should end.

We disagree that “*The Town Centre is a region of active redevelopment*” as stated in section 9.13 of *Nepean River Floodplain Risk Management Study & Plan Including Narellan Creek (Final Draft Report) 20 September 2019*. There should be (by definition) limited redevelopment in the Heritage Conservation Area. There have only been a handful of approvals for redevelopment in the Heritage Conservation Area, and we would argue that many of these should not have been approved in any case.

We do not agree that there should be any high-density development in either the Heritage Conservation Area or flood prone areas.

The reason Camden has remained such a remarkably intact and historic rural town is due to the surrounding flood plain, and the flood prone nature of the northern part of the town. This has restricted much of the development in the Edward and Elizabeth Street areas to rural industries, and ensured open fields surround the town on three sides. This is part of Camden’s heritage and its history. We have spent many years trying to preserve the historic character of the town and do not want that work undone.

Yours sincerely,

**Nepean River Floodplain Risk Management Study  
and Plan**

**Public Exhibition Submission**

**02\_Submission 4\_Attachment 1**

General Manager,  
Camden Council  
70 Central Avenue,  
Oran Park NSW 2570

**Re: Flood Risk Management Policy**

Thank you for the opportunity to comment on the proposed Flood Risk Management Policy and associated documents. I live in South Camden, so observations and comments are limited to the Nepean River Catchment.

The association of a concessional area with the Camden Town Centre Heritage Conservation Area (HCA) is puzzling. The HCA boundaries are not related to flooding, nor do all parts of the HCA have the same flood risk. Some parts of the HCA are above the PMF, others are below all AEPs, and some are floodways. The NSW Flood Manual explicitly states there should be no new development below the 1% AEP. Perhaps the concession should be changed to areas above the 5% AEP or deleted for consistency with the NSW Flood Manual.

The Camden Town Centre Conservation Area is not a place of active redevelopment. Over recent years only a handful of development consents permit demolition and reconstruction. Most of the approved work is yet to start. The major development is on the old high school site. Despite their current zoning, most of the outlying buildings are residences.

Granting concessional status to the HCA but not other similar areas creates an equity issue and a perception of bias. Why is the HCA different from other areas like Little St or Pindari Ave?

Deleting the HCA concessional development clause would not sterilise the area as the remaining concessions still allow redevelopment. In addition, the Camden Local Environment Plan (CLEP) mandates a 7m height limit for large areas of the HCA. The Camden Local Planning Panel noted technical problems with the flood policy and the CLEP in the minutes of their 15 March 2022 and asked the Council for control changes.

The Department of Planning, Industry and Environment states the defined flood event is selected by Council for floodplain risk management purposes<sup>1</sup>. The NSW Floodplain Development Manual identifies the 1% AEP, or an equivalent historic flood, as an appropriate starting point for determining the DFE for development controls. According to the SES, from the 1790s to August 2021, there have been over 130 moderate to major floods in the valley. Perhaps there should be no development in these areas and assistance for property owners to move. Perhaps the Policy could be improved if there was discussion and justification for defining concessional areas and their treatment. The Nepean River Floodplain Risk Management Study & Plan Including Narellan Creek, identifies only 200-300 houses with floor level inundation at the 1% AEP (page 8). It would seem

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<sup>1</sup> [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/Considering+flooding+in+land+use+planning+guideline+-+July+2021.pdf](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/Considering+flooding+in+land+use+planning+guideline+-+July+2021.pdf)

possible to substantially reduce damage with a few well-chosen purchases and strictly applied development controls.

The Nepean River Floodplain Risk Management Study and Plan notes (page 69) that Council does not have a formal climate change policy. The authors of the Policy and Plans have chosen their own standards and projections for climate change. The standards adopted and the reasons for their adoption are not obvious from their content. A Climate Change Policy, formally adopted by Council, would be better and ensure consistency and accountability in the flood management documents. In these times, I suggest a formal Camden Council Climate Change Policy is a prerequisite for these reports.

During the exhibition, the 2022 NSW Independent Flood inquiry<sup>2</sup> released its findings. There are many recommendations which seem relevant L- flood risk management, N – landholders can access information on previous disasters, O – risk-based approach to calculating flood planning level, P – disaster adaption plans for all towns, Q – floodplains as assets, R – simplify the planning system disaster provisions, S- housing and rehousing issues, T- caravan parks and manufactured home estates, U – roads and landslips, V – environment, and W – essential serviced and floodplain infrastructure.

The executive summary discusses preparedness, climate variability and a need to change how we consider floods and floodplains. The summary notes the failure of the ‘rinse and repeat’ approach to floodplain planning and advocates the need for a cultural shift. The summary suggests a closer connection between risk management and development outcomes.

The Policy would be enhanced if there was a statement of how the Council intends to respond to the recommendations of the 2022 NSW Independent Flood inquiry.

The format and content of the Flood Risk Management Policy are different to those adopted by other councils. Other councils<sup>3</sup> seem to focus on risk identification, response measures and mitigation. They tend not to contain specific controls but place them in their Local Environment Plan and Development Control Plans. Camden’s Flood Risk Management Policy lacks discussion of risk identification, response measures and mitigation. Instead, it contains actual development controls. The format adopted by the other councils seems more effective and simpler to use. There is no obvious advantage in creating a new planning instrument and a unique set of definitions (see later).

We live in a time where there is general agreement the climate is changing. According to the CSIRO,<sup>4</sup> we can expect less rain but more intense extreme rainfall events. The climate change in Australia website<sup>5</sup> states that short-duration, extreme rainfall events are often associated with flash flooding. These changes in intensity bring increased risk to communities. Heavy rainfall events are typically caused by weather systems such as thunderstorms, cyclones, and east coast lows. These circumstances triggered the last series of floods in Camden.

It seems my area is particularly vulnerable to rainfall increases. In section 2.4, the proposed Flood Risk Management Policy states:

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<sup>2</sup> <https://www.nsw.gov.au/nsw-government/projects-and-initiatives/floodinquiry>

<sup>3</sup> <https://www.cityofsydney.nsw.gov.au/floodplain-management-plans/floodplain-catchment-sydney-city>  
<https://datrack.hawkesbury.nsw.gov.au/masterviewui/user/dwssubject/default.aspx?page=found&1=flood%20policy>

<sup>4</sup> <https://www.csiro.au/en/research/environmental-impacts/climate-change/climate-change-information>

<sup>5</sup> <https://www.climatechangeinaustralia.gov.au/en/changing-climate/climate-trends/australian-trends/>

*Potential impacts from climate change were assessed by modelling the flood behaviour arising from increase in rainfall intensities through the flood risk management process as identified in Council's up-to-date Flood Study/Plan. The results showed that the Nepean River catchment is prone to large flood level increases as a result of the increased rainfall intensities from climate change. Under the climate change scenario, the flood levels increased by up to and over 1.5m within the catchment.*

The Nepean River Floodplain Risk Management Study & Plan Including Narellan Creek draft final report, shows the modelling is based on a 10% rainfall increase. Such an increase raises flood levels in the Camden CBD by 0.5m to 0.75m. The report then states the freeboard (0.5m) will absorb the increase and, in the best-case scenario (table 9-6), will provide protection (%1 AEP + freeboard) of floor levels until 2030.

None of the documents discusses the adoption of a 10% rainfall increase. Science suggests the atmosphere can hold about 7% more moisture per 1°C. There is a wide range of forecasts ranging from 1.1°C to 5.4°C. These forecasts suggest modelling based on a 10% increase is conservative. At a more technical level, the modelling is not validated against the latest version of ARR Guidelines (ARR 2019).

The current Flood Management Plan was adopted in 2006 and has lasted for 16 years. If the life of the new plan is similar, we can expect it to last until 2038. Therefore, the 1% AEP will exceed the current FPL during the Policy's life. The draft policy would be better if the increase was highlighted and communicated to the community.

In flood time, from South Camden, the only access to emergency services is via the Macarthur Bridge. This is a single-span bridge with a single lane in each direction. Should it be congested, blocked, or closed, there is no access for emergency services to central Camden, south Camden, or parts further west. The relocation of the police, fire services, and emergency shelters to the Narellan side of the bridge and the downgrading of the Camden Hospital is a problem. Especially if the bridge is closed when the flood level reaches 14m as proposed in the SES's Camden Local Flood Plan. The development of the old High School site, Carrington, and the proposal for the redevelopment of the Stock Yards to include a hotel and shop top housing only add to the problem. During the last set of floods and the previous bushfires, the traffic was backed up for several kilometres on my side of the bridge.

The Policy does not use the same land use descriptions and definitions as the Camden Local Environment Plan (CLEP). Instead, the Policy seems to adopt its own inconsistent, imprecise, and confusing definitions. For example, the plan places seniors housing in Sensitive Uses and Facilities. However, Sensitive Uses and Facilities are not listed in the HCA concessional area, effectively barring seniors housing development on the old Camden High School site.

Another example is 7.3.8 Rural & Recreation, which includes "Information facility". This use is not described in the plans and not defined in the CLEP. I have an ICT background and an "Information facility" means the massive data centres constructed by Microsoft and Amazon. Similarly, there is the term "recreation facility" this use is not defined in the CLEP. Although the CLEP contains a recreation area, recreation facility (indoor), recreation facility (major), and recreation facility (outdoor), each carries a different risk. The distinction is more than academic. The recent flood damage to the softball fields at the entrance to Camden illustrates the risks and costs associated with flooding and recreation spaces. It suggests more expensive facilities associated with anything

other than a recreation area (CLEP definition) should be above the 1% AEP. Precision in planning documents is important.

The Policy's matrices specify specific controls for different places and risk levels. However, there is no discussion or justification. Of particular concern is the lack of the requirement to consider the impact of cumulative development in all instances (Point 3 of 1.3.5 Emergency Management).

There is no discussion of special flood considerations in areas between the FPA and the PMF and land that may cause a particular risk of life and other safety considerations. The omission is disturbing as the Nepean River Floodplain Risk Management Study & Plan Including Narellan Creek demonstrates a significant residual flood risk even if buildings are constructed above the FPL (see page 34).

The Policy does not incorporate the changes recommended in the Nepean River Floodplain Risk Management Study & Plan Including Narellan Creek on page 61. For example, a 600mm freeboard and the need to demonstrate reliable, safe flood access.

Here is a summary of the issues I have raised with the Policy and supporting documents:

- No Climate Change Policy.
- Impact of the 2022 NSW Independent Flood inquiry on the Policy.
- Different formant and focus to other Council's Flood Risk Management Policies.
- Rather than relying on existing planning instruments, the Policy introduces specific controls and unique definitions.
- There is no justification for using a 10% rainfall increase in the climate change modelling.
- The models use ARR 2016 and not ARR 2019.
- The projected increase of the 1% AEP will exceed the current FPL within the Policy's life. Yet there is no policy for managing or communicating the problem.
- Both Nepean River Catchment matrices do not require consideration of cumulative development in all instances.
- Congestion and blockage of evacuation routes.
- Concessions for areas subject to frequent flooding at low water levels (i.e. 5% AEP)
- The Camden Local Planning Panel requested precinct-specific design control for the HCA.
- Concessional status of the HCA and the apparent disregard for equity and flood risk management.
- The use of unique land use descriptions is inconsistent with the definitions in the Camden Local Environment Plan.
- Lack of discussion of special flood considerations in areas between the FPL and the PMF.
- Adoption of the Nepean River Floodplain Risk Management Study & Plan Including Narellan Creek recommendations.

Yours Faithfully

**Nepean River Floodplain Risk Management Study  
and Plan**

**Public Exhibition Submission**

**02\_Submission 5\_Attachment 1**



**Re: Draft Flood Risk Management Policy P1.0046x**

The draft risk management plan which Camden Council appears to be trying to sneak through the system with a minimum of public input is garbage. How many Camden Council staff members who worked on this plan have actually seen a flood in Camden prior to the four flood events we have experienced in the last 18 months? I suspect very few.

The fact is that until the recent flood events, Camden had seen little or no significant flood activity since 1990. I moved to Camden in 1987, and have lived within walking distance of the Nepean River between Cowpasture Bridge and Macarthur Bridge for 35 years. I remember significant floods in 1988 and 1990, and cannot recall another significant flood until last year.

My point is, how can you produce a credible flood risk management policy without recent flood data? The 2015 Nepean River Flood Study and the 2020 Nepean River Floodplain Risk Management Study by Cardno which underpin the policy are impressive documents, but they can only be based on old historic flood data, without the benefit of the data from the 2021/22 floods. Climate change appears to be significantly influencing rainfall and flooding patterns in eastern Australia, as illustrated by the recent Lismore floods, which are reported to have reached 2 metres above the previous highest recorded flood levels. This is not factored into the local models. When will it be Camden's turn?

The draft document contains a clause which I find totally offensive, as will anybody who has fought to preserve the heritage of the Camden Heritage Conservation Area. The third category of "concessional development" on page 10 and 11 which creates a possible opening for further heritage inconsistent development applications within the Camden Heritage Conservation area must be removed.

**Not only does it discriminate against heritage preservation in flood affected areas of Camden, but it is also inconsistent with the very sensible requirement in 7.3.6 that commercial and industrial development is only permitted in areas outside floodways.**

**Why make an exception for development within the Camden Heritage precinct?**

I attach a rough analysis of listed items within the Camden LEP heritage conservation area that are flood affected. I am not suggesting that all these are in mapped floodways – I used the 2015 flood study which is more user friendly. What the analysis shows is the potential for inappropriate development within the flood affected areas of the precious Camden heritage conservation area.

Whether Camden Council planning staff like it or not, local government is entirely the creature of the NSW government, deriving its powers from the NSW Parliament. When releasing the NSW flood inquiry report today (17/8/22), NSW Premier Perrottet said:

***“the state cannot keep developing in areas that are at high risk of floods...it has to stop and today it does”***

The Premier was speaking particularly about Lismore, but the Camden floodplain is also part of that promise. Council can rest assured that the people of Camden who care about the preservation of our heritage will be reminding the Premier of his promise for no more development in areas at high risk of floods, heritage listed or otherwise.

**Heritage Listings in Camden Heritage Conservation Area that are flood affected (Camden LEP 2010) according to 2015 Nepean River flood study**

	Argyl e St	Mitchel l St	Vie w St	Edwar d St	Joh n St	Exete r St	Elizabet h St	Cawdo r Rd
1% & 5% AEP <sup>1</sup>	4	5	1	<sup>12</sup>	1	2	4	1
PMF <sup>3</sup>	6	1	1	0	5	0	0	0

<sup>1</sup> AEP = Annual Exceedence Probability (Definitions, p 4)

<sup>2</sup> Edward Street, Camden is flood affected at the 5% AEP level for its entire length

<sup>3</sup> PMF = Probable Maximum Flood – the largest flood that could conceivably occur (Definitions, p 8). This figure is a moveable feast given the impact of climate change on rainfall and flood patterns. The last major flood in Lismore in 2022 was apparently 2 metres above the previously highest recorded flood level. Exactly the same possibility exists in Camden.

**Nepean River Floodplain Risk Management Study  
and Plan**

**Public Exhibition Submission**

**02\_Submission 6\_Attachment 1**

Warning - This email originates from an external organisation

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Camden Council

The General Manager 4655 8899

Dear Sir.

The current flood regulations are a the 2005 version.

Council states it is updating flood development regulations, this date is quoted 2018, this leaves out the recent three large floods, 2021 - 2020, and forgets historic information held by Camden Museum.

Council claims indemnity, this is not always the case.

It should be recognised that the indemnity offered by Section 733 is limited. For example, if a Council fails to make a real attempt to perform a task relating to the likelihood of any land being flooded, then the indemnity is not available (see *Mid Density v Rockdale Council* (1993) 44 FCR 290 and *Attrill v Richmond River Shire Council* (1995) 38 NSWLR 545). It should also be noted that mere adherence to this manual, without proper use of relevant statutory powers, could potentially void this statutory indemnity.

Councils present intention stated in the new 2018 development proposal, is to increase the size of buildings and density of people in the flood plain, this is in direct opposition to recent NSW Government regulations, brought about by three large flood events in a short time frame.

One proposal is to have a very large shopping centre in a historic floodway 1873, 71.40 metres and 1964 69.75 metres.

The frontage to Edward Street 67.40 is four metres below 1873 and 2.25 below 1964.

The rear of the site is 63.50 metres, the same height as the Cowpasture Bridge

There are huge areas of hard surface in place since these events, and more to come.

Council should not be allowing greater density of buildings and more people living and working in Camden.

Regards

**Nepean River Floodplain Risk Management Study  
and Plan**

**Public Exhibition Submission**

**02\_Submission 7\_Attachment 1**

The General Manager/Flood Plains Review Team

Camden Council

Central Avenue

Oran Park

### **Re Exhibition**

### **Flood Risk Management Policy**

### **Nepean River Flood Plain Risk Management Study and Plan**

1. I write to suggest that the present documents are inadequate and need updating re the NSW Government's Policy announced on 17 August 2022. In addition there is a need to thoroughly engage the local community, particularly in light of the experiences in the four floods experienced in Camden so far this year.

2. These matters are of particular concern:

a) On 17 August the NSW Premier stated 'we cannot keep developing in areas that are at high risk of floods ..... We've been doing that for the last 100 years. It has to stop, and today it does.' Any Camden Council Flood Plain Management document has to take this statement into account. Therefore there should be no more structural development of any sort of flood affected land in and around Camden.

b) This means the 'Concessional Development' clause pertaining to the Historic Conservation Area (HCA) needs to be immediately removed. Why it was ever included in the first place is open to speculation. Many community members believe it was included to allow further unsuitable development in the HCA.

c) The Draft Flood Policy is not based on up to date information. It does not take into account community knowledge and views based on the four floods Camden has experienced so far in 2022. These views must be taken into account to ensure that genuine and extensive community consultation has taken place.

d) There is a belief that the Draft Flood Policy underestimates the potential effects of Climate Change. The Nepean River catchment area is now prone to large flood level increases as a result of increased rainfall intensities as a result of Climate Change. This raises the following questions:

(i) Is the potential flood impact from climate change captured by the 10% adjustment and covered by the FPL freeboard?

(ii) Is the potential flood impact from climate change incorporated into mapping?



In conclusion, any Flood Plain Management Policy should be based on one principle – the NSW Premier’s declaration of 17 August 2022 quoted above. That is, there should be no further development on flood affected land anywhere in the Camden LGA. Flood affected land should be used for agricultural and recreational purposes only. This will enable Camden Council to tell potential developers there is nothing to be gained by buying cheap flood affected land in the HCA, or elsewhere, with the idea of submitting DA’s that breach the current building restrictions. The final Flood Plain Management Policy needs to remove any ambiguity on this matter.

**Nepean River Floodplain Risk Management Study  
and Plan**

**Public Exhibition Submission**

**02\_Submission 8\_Attachment 1**

The General Manager / Flood Plains Team  
Camden Council  
Oran Park

August 26, 2022

**Re: 2022 Exhibition  
Flood Risk Management Policy  
Nepean River Floodplain Risk Management Study and Plan**

***(Mainly as pertaining to the township of Camden)***

The exhibition was of minimal help in understanding Council's respect for or care for the community of Camden, a town designed with floodplain virtually surrounding the town, accustomed to floods and benefitting from the 'rural idyll' of agricultural pursuits using those flood plains. This setting is integral to the value of Camden as a unique historical resource and attraction for the entire Sydney region and beyond. (The economic benefit of preserving these essential elements of the town has been recognised in past planning documents and heritage listings.) Camden Council should be arguing for the preservation of the historic town of Camden as distinctly different to the broadbrush of politically driven 'development'. Camden Council should be representing this difference and promoting the landscape retention benefits for state and national well-being, not meekly complying with ill-informed dictates of state policy.

During many floods all access/exit routes to the town area are cut by water, leaving only the Camden South exit to the Old Hume Highway and the Macarthur Bridge for travel into and out of the town. This area becomes exceptionally congested...yet no recognition of the hours of congestion even without further town development is recognised in the policy documents. Where is there evidence of our local council actually representing us to the state authorities? Using flood plains for rural pursuits, for rural education, for bush 'schooling', for orienteering and community passive recreation offers long term future positives that immediate individual profit-seeking could only destroy. Previous flood policy has prevented further residential development (even extra bedrooms) in the heritage conservation / flood affected area, yet this new proposed policy seems to leave room for anything to be possible. The vision of the implications in evacuations is horrific.

The exhibition documents seem quite out of place given the recent 4 floods this year. The State Premier has stated that we must not have further flood plain development. The explanation from council representatives that a new flood policy is much overdue, does not make it acceptable to rush the process now

by ignoring new conditions and understanding drawn from our most recent multiple floods.

I especially ask the Flood Plains Review Team and Council to consider the following points:

1. **Need to delay** settling on any new flood policy until it is brought in line with the Premier's recent declaration that we cannot keep developing in areas that are at high risk of flooding. **Recent experience must inform any new policy.**
2. The **'Concessional Development' clause pertaining specifically to the Heritage Conservation Area must be removed.** It is a slap in the face to the teams of people who have worked with highly skilled consultants to identify what is to be valued and preserved for all time. To include this clause, specifically, is to say that our Council and Council Employees have not taken the trouble, nor been offered the training, to understand and appreciate the town and people who they represent or for whom they work. \* I understand how, on first glance, much of the area might seem unworthy of preservation, but perusal of the past assessments is an eye-opener. The suggestions of those past assessments as to how discreet changes can be made to suit changing purposes, but, essentially the restricted footprints of the buildings, preservation of green space and restricted heights are essential. There is much room for community dialogue on this matter. It is the 'quaintness' and authenticity of the town that brings tour groups, families, and individuals to the area, and has been the attraction for a huge proportion of the residents who have selected Camden as their home.
3. The concept that the land would be 'sterilised' (emotive, negative term) by not being built upon is hugely problematic. Even this week our city-based media have been featuring a desperate need for young people to experience real nature, to have bush experiences, to learn about growing plants and nurturing animals. Camden has always had the advantage of being accessible to the city. This does not seem to be the time to be destroying our natural advantage for the short term gain of uninformed property developers who grab cheap land and seek to flaunt the limitations that made it cheap in the first place.
4. The proposed policy does not seem to provide a realistic assessment of the **safety impact** of more intense development in the Heritage Conservation Area. Given the extreme limitations in regard to getting in or out of Camden in flood times, and the hours of delays experienced recently, what indemnity is Council taking on by increasing the numbers of people needing to access alternative accommodation and/or storage in surrounding areas? Historically,

the flood level has been higher yet again, and has affected the commercial centre. The thought of ignoring Camden's geographic limitations defies belief. As stated before, those very limitations can be seen as the town's greatest asset. To ignore them courts disaster and the incredulity of future assessors.

5. The climate change data used should be questioned. The 10% figure seems arbitrary and not consistent with recent or predicted lived experience. **Decisions related to increased risk in flood prone areas and increased interference with waterflow at such times should not be made on the basis of such flimsy 'data'.** Lismore experiences can only be described as unimaginable in the light of any current climate change data beyond that of increased intensity and unpredictability. Can council provide a **forum** with climate change scientists who would be prepared to support increasing the exposure to flooding for more people and property?

6. A policy with as much import as this should have involved extensive **community consultation**—face to face discussion, not just a difficult to follow assembly of written papers with no prior exposure to the thought processes or principles upon which it was being developed. Hand in hand rather than top down would be much appreciated, and would bring to council a wealth of lived experience, including that of some very knowledgeable professionals. Most of council and council employees these days do not live in Camden and only a few took the opportunity to observe the full-scale flood effects this year. The community experience is essential.

\* For starters: Camden Town Centre Urban Design Framework, Camden LEP and DCP, which have all involved extensive community consultation.

Yours Sincerely,

**Nepean River Floodplain Risk Management Study  
and Plan**

**Public Exhibition Submission**

**02\_Submission 9\_Attachment 1**

# *Camden Residents' Action group*

*Incorporated  
Camden – Still a Country Town*

**Website:** <http://www.crag.org.au/>

**Face Book:** <https://www.facebook.com/CRAG-Camden-Residents-Action-Group-Inc-180570517308888/>

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The General Manager  
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cc Councillors

26 August 2022

Dear Floodplain Team,

**Re: 2022 Exhibition  
Flood Risk Management Policy  
~~Nepean River Floodplain Risk Management Study and Plan~~**

The above exhibition on *Your Voice* is of intense interest, with ramifications into the future for the community. Floodplain management is of topical concern and foremost in minds given recent and unusual flood events.

The exhibition includes numerous documents under separate categories of policy and studies, many of which are technical. Their content involves complex interrelationships between community welfare and land use planning based on Flood Planning Levels (FPLs) predicated on the concept or value judgement that floodplain land must not be “sterilised.” This presumption is no longer valid.

The 2022 NSW Inquiry<sup>1</sup> into lack of preparedness for recent flood events consulted with stakeholders through 144 meetings and received 1,494 submissions. The people of NSW have shared their stories.

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<sup>1</sup> NSW Government 2022 *NSW Flood Inquiry* Available at  
<https://www.nsw.gov.au/nsw-government/projects-and-initiatives/floodinquiry>

The findings of the Inquiry and its 28 recommendations, all accepted by the NSW Government, are unambiguous. People agree with the NSW Government's response to the Inquiry as announced by the Premier, that building on the floodplain stops now<sup>2</sup>.

The inquiry also made clear, that floodplains are never necessarily "sterilised" as there are many land uses that are of benefit to the community and environment.

This exhibition raises many questions about protection of life, livelihoods, homes and private and public assets. Advice from the Floodplain Team was that outstanding questions should be raised in submissions and that they would be answered in its review of submissions and report on Camden's floodplain management and policy.

These questions and our comments follow.

### **THE HCA CONCESSIONAL DEVELOPMENT CLAUSE MUST BE DELETED**

Despite having asked the question a number of times, we are at a complete loss as to why the following extraordinary clause concerning the Heritage Conservation Area (HCA), without any explanation, has been included in the draft Flood Risk Management Policy (draft Policy) (7.3.7, pp 10-11):

***Concessional development in the case of development within the Camden Heritage Conservation Precinct: All Commercial and Industrial, Low, Medium and High-Density Residential developments (as categorised in this policy) located only within the Camden Heritage Conservation Precinct shown in Figure 3 of the Appendix 1*** (copied in below).

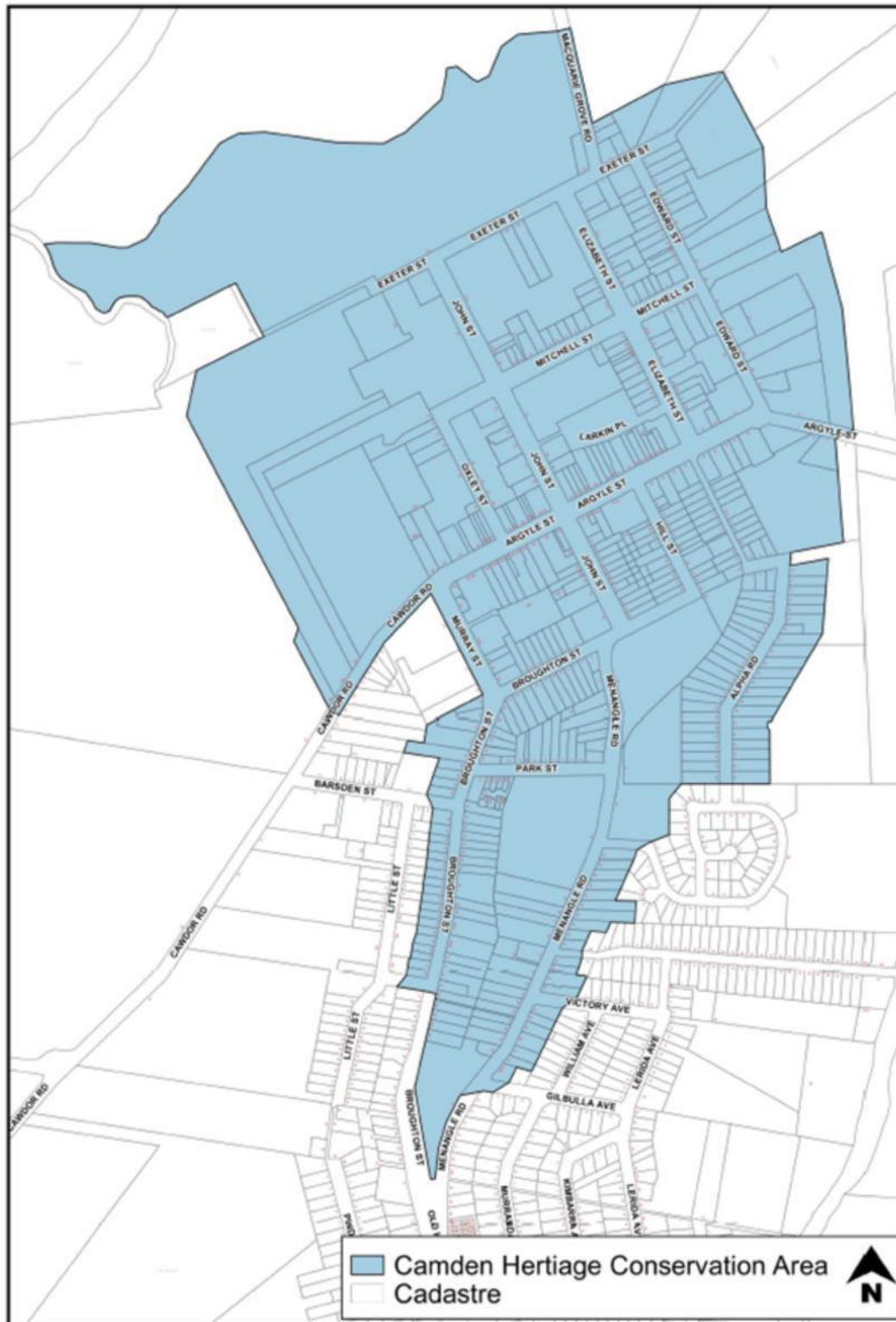
The development matrices (pp 28-29) contained in Appendix 3 of the draft Policy show the categories of flood risk and the applicable development controls numbered 1 to 7 (pp 24-27). Concessional development is allowed in the flood areas, including high risk areas.

As shown in the mapping, much of the Heritage Conservation Area is flood prone and much is categorised as high flood risk. Although many facilities within the HCA are sensitive in that they are used by children and seniors and are needed for the community to return to normal activities after flood events, it seems the draft Policy is to allow significant development as concessional as long as it is outside any floodway.

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<sup>2</sup> ABC 17 August 2022 *NSW 2022 Flood Inquiry report recommends flood zone buy backs, changes to disaster response* Available at <https://www.abc.net.au/news/2022-08-17/nsw-independent-flood-inquiry-report-made-public/101331288>





Source: Camden Council 2022 *draft Flood Risk Management Policy Appendix 1 Figure 3*  
*Extent of Camden Heritage Conservation Precinct for the purpose of Development Control Matrix*

There are three categories of concessional development in the draft Policy (7.3.7):

- ***Concessional development in the case of commercial and residential (low, medium or high density) development:***
- ***Concessional development in the case of other development:***
- ***Concessional development in the case of development within the Camden Heritage Conservation Precinct: a) All Commercial and Industrial, Low, Medium and High-Density Residential developments (as categorised in this policy) located only within the Camden Heritage Conservation Precinct shown in Figure 3 of the Appendix 1 (copied in below).***

The first two categories, which in any case would capture the HCA, cover small additions, rebuilds or changes to existing building in a flood area etc. They do not allow large additions or new developments. That makes sense.

***(1) Why is the specifically defined small precinct of the HCA different to other flood prone areas?***

The verbal answer from Council staff, that the NSW Government does not allow Camden Council to sterilise land, does not explain the discrimination.

***(2) Why are developers of other flood prone areas subject to limitations but not would-be developers in the HCA?***

Another reason for the special HCA category given by the Floodplain Team was that it prevented the need for merit-based approvals under the draft Policy, which the 2006 Policy allowed. We well know this from experience, for example with DA approvals in the HCA for development of 20 Elizabeth Street and 19 Edward Street. These DAs involve demolition of extant HCA fabric, noted as significant in the HCA listing, and replacement with new developments that are over-height and non-reflective of Camden's history and detrimental to its sense of place.

These DA approvals also bring more people and equipment into areas of high flood risk, as do the HCA approvals of the major addition to the Milk factory and the new build at 11 Mitchell Street which also inexplicably allows more residents into the high-risk area in contradiction to the 2006 Policy. They are non-compliant developments according to the LEP and DCP. Landlords and tenants will not be able to afford insurance. Evacuation routes will be further stressed. They were highly contentious DAs with many objections being lodged by the community.

***(3) How could these DA approvals be justified as merit-based, even under the HCA concessional development clause?***

What the HCA clause means in practical terms in relation to other contradictory Council policies is not explained. Nor is/are its architect(s) identified in the documentation. No cost/benefit analysis is presented. With no supporting documentation it seemingly comes out of thin air.

The HCA is precious, highly valued by the community and visitors and well documented to be of irreplaceable and high heritage significance in the story of colonial NSW and Australia. As the clause reads it would seem to necessarily result in the destruction of the cultural and heritage significance of the HCA. The community has been consulted many times about Camden's heritage. The answers over decades have always been that it must be conserved, as reflected in its heritage listing and Camden Council policies.

***(4) Why should this HCA concessional clause, despite the flood risk and loss of heritage, make the DA process easier for developers and DA assessors, at the expense of what the community values?***

Clearly, especially in the wake of frequent and unprecedented flooding this year in NSW, including Camden, it is foolhardy (and insensitive) to encourage development through concessions which can only reduce people's safety, make evacuation routes more congested, increase flood damage and cumulative impacts and increase the difficulty of applying development controls as developers push the envelope.

Increased stress on the provision and management of emergency services and the public purse is obvious and of wide community and political interest.

The community was not consulted about this clause and the conclusion must be that the cultural and social aspirations of the community and its support for the protection of the HCA have been ignored, or as could be interpreted, treated with contempt. The earmarking of the HCA, a well-loved community asset with a very special sense of place and long and deep community connections, for concessional development without explanation is disrespectful and utterly unacceptable to the community. It is disturbing that it is presented in this undemocratic way without any explanation. It is not a good look. It does not pass the pub test.

***(5) Why wasn't the community consulted on this HCA clause?***

***(6) Why, when the community has long identified with Camden's history, expressed its high esteem for the HCA and enjoyed its open country town characteristics and agricultural heritage, has this clause been dropped into the draft Policy without any preamble or reasoning?***

***(7) Who benefits from this HCA concessional clause?***

It is extraordinary that the clause allowing concessional development in the HCA is not consistent with other Council policies, including the 2020 Local Strategic Planning Statement (LSPS) which aligns with the strategic directions of the Western City District (WCD) Plan within the NSW plans for greater Sydney.

For instance, the LSPS states:

*Camden Town Centre was established as part of the agricultural expansion of the early settlement of Sydney, being one of Sydney's oldest towns. The local community holds the Camden Town Centre in high regard for its attractive streets, beautiful heritage buildings, and rural village feel. (p. 14)*

*Tourism is thriving, with Camden capitalising on its heritage and rural values and offering a strong local food scene, cultural festivals and events... Heritage sites are protected and promoted, helping to engage the community on the importance of Camden in Australia's European and Indigenous history. (p. 22)*

*Local Priority L2 Celebrating and respecting Camden's proud heritage. These initiatives will ensure that Camden's valued heritage is protected from the impacts of development and can continue to be celebrated by the community. (p. 45)*

These statements are consistent with community views, Camden Town Centre Urban Design Framework, Camden LEP and DCP, and other Council policies. The community is usually consulted on policy and strategy.

The HCA clause is NOT consistent as it sends a signal to developers that undeveloped floodplain is up for grabs and that demolition and replacement of HCA fabric with constructions of inappropriate scale and modern design is concessionally allowable and even encouraged.

***(8) Why is the HCA concessional clause treated in isolation, without reference to, consideration of, and in contradiction to LEP provisions (including the 7m height limit), DCP and all other Council policies?***

We note that *Nepean River Floodplain Risk Management Study & Plan Including Narellan Creek*<sup>3</sup> addresses the need for land and its availability and states

*.... it is important that available land be used in an appropriate, sustainable way, in order to meet the needs of both the growing population, as well as ecosystem health and services. Whilst the flood extent from the Nepean River covers a relatively large area, there is still substantial flood free areas available for development. Given the significant risks posed by flooding along the Nepean River, it is not recommended that flood controls be softened to allow additional development. (9.7)*

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<sup>3</sup> Cardno 20 September 2019 *Nepean River Floodplain Risk Management Study & Plan Including Narellan Creek* (Final Draft Report) Available at [https://hdp-au-prod-app-cam-matters-files.s3.ap-southeast-2.amazonaws.com/7716/5821/3637/22\\_146637\\_02\\_-\\_Nepean\\_River\\_FRMSP\\_Report.PDF](https://hdp-au-prod-app-cam-matters-files.s3.ap-southeast-2.amazonaws.com/7716/5821/3637/22_146637_02_-_Nepean_River_FRMSP_Report.PDF)

Yet this HCA concessional development clause does allow additional development and does put more people and property at risk. It not only softens the flood controls it promotes additional development in a small defined area that is highly flood prone.

***(9) What is the reason that overrides the principle of not putting more people and property at risk?***

The same *Risk Management Study & Plan* addresses social and heritage issues and states: *Heritage issues are also a concern in the Study Area, with historic regions of the Camden Town Centre having been constructed well below the 1% AEP flood level. The Town Centre is a region of active redevelopment, and the FPL and planning controls adopted have the potential to significantly impact the type and style of this redevelopment. Council is desirous to retain the existing scale and street frontages in the Town Centre, which would result in lots experiencing large over-floor flood depths in both the 1% AEP and the PMF. The final selection of the FPL will need to balance the social and heritage needs in the Camden Town Centre, against Council's responsibility to protect its residents from flooding risks.* (9.13)

We dispute that the old town is under active redevelopment unless referring to the special and contentious case of the development for the 'sensitive' use of seniors' living on the old Camden High School site. The answer of course is that this development was and still is highly questionable. Recent flooding events have clearly shown why placing a large number of more vulnerable citizens in harm's way and congested evacuation routes is irresponsible.

The HCA is a tiny area within a large LGA, that by definition is to be conserved, not redeveloped. There should be no "concession".

As noted above, the main reason for the clause that we have been offered is that the NSW Government does not allow floodplain land to be "sterilised". Clearly that view has changed in the wake of the Report on the 2022 Flood Inquiry, the NSW Government's response and the Premier's comments.

The NSW Government response to the independent Inquiry's findings is unambiguous. It supports all 28 recommendations, either in full (6) or in principle (22). The NSW Premier stated: *we cannot keep developing in areas that are at high risk of floods... We've been doing that for the last 100 years. It has to stop, and today it does.* <sup>4</sup>

***(10) Why would Council expect the community to accept this HCA clause in the wake of the Camden floods and the Lismore catastrophe?***

***(11) Why wouldn't the community take the words of the Premier at their face value, that floodplain development stops on 17 August 2022?***

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<sup>4</sup> ABC 17 August 2022 NSW 2022 Flood Inquiry report recommends flood zone buy backs, changes to disaster response Available at <https://www.abc.net.au/news/2022-08-17/nsw-independent-flood-inquiry-report-made-public/101331288>

The response that we received from Council staff was that it would take time for the NSW Government to issue new directives although all recommendations were accepted. It could take years and meanwhile the directive was that land could not be sterilised.

***(12) Why, in the wake of the successive Camden floods this year, with more predicted and the damage, disruption and personal anguish<sup>5</sup> that they have caused, should the community accept this tortured logic?***

***(13) What vested interest does this HCA concessional clause serve?***

In any case, using floodplains for agriculture, recreation and the environment is not “sterilising” them but using them for the benefit of the whole community.

Developers purchase cheaper land with flooding (and heritage) constraints in the HCA, believing they can jump the planning hurdles, gain a DA approval and make windfall gains. This has proven to be possible, particularly if the owner quickly sells the site with a DA intact (11 Mitchell Street) or otherwise quickly moves on during a dry spell; the result is potential private gain at the expense of amenity, irreplaceable heritage and problems for others into the future. The longer-term mechanisms of the economy and financial systems mean that ROIs in floodplain development equalise with those of similar investments in flood-free land, but without the un-costed human toll on mental health and well-being. There is ample flood-free land in the Municipality. At a macro level the public cost of evacuations and recovery is wasteful, not productive. Even from a neo-liberalist view this HCA clause cannot be explained or justified.

The real and human cost of floodplain development is borne by everyday people including the subsequent and possibly unsuspecting occupiers of the new or overly redeveloped premises, including through loss of income and high insurance.

***(0) What is the economic imperative behind the HCA concessional clause? Please explain.***

Planning Circular PS 21-006, included in NSW’s finalised flood-prone land package<sup>6</sup> which came into effect on 14 July 2021, lists key issues in land-use planning and reducing risk to life, property damage and other flood impacts on existing and future occupants of flood prone land including:

- *safety of people including evacuation considerations;*
- *management of flood risk, to reduce flood damage to public and private property and Infrastructure;*
- *management of the impacts of development, including cumulative impacts of development*
- *application of development controls;*
- *management of the impacts of development on emergency services.*

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<sup>5</sup> A Current Affair 22 February 2022 *Camden locals flee as floodwaters force evacuation* Available at <https://9now.nine.com.au/a-current-affair/nsw-floods-camden-locals-receive-evacuation-order/28c4399e-b932-4c01-8cc9-d634b2208349>

<sup>6</sup> NSW Government *Keeping our communities safe* Available at <https://www.planning.nsw.gov.au/flooding>

***(0) How are the above key issues in land use planning addressed by or consistent with the HCA concessional development clause which encourages development and more occupants in a high flood risk area?***

It is foolhardy at best to develop floodplains. NSW Planning Circular PS 21-006 reiterates that NSW Government's Flood Prone Land Policy is that councils are primarily responsible for managing flood risk and are protected from liability (under s733 of the LGA Act) if they have followed NSW policy as set out in NSW Floodplain Development Manual (referred to in the introduction of Camden's draft Policy).

Concessionally allowing development in particular flood areas, including high risk areas, whilst not allowing it in similarly risky areas is counter-intuitive and legally reckless.

Allowing the rivers to take their natural course and respecting their strength is wise, and prevents tragedies like Lismore. In a vast country like Australia, with its weather extremes, it is madness to do otherwise.

The first two concessional categories work equally well for the HCA and are consistent with heritage conservation as espoused by Council and as expected by the community.

***(1) Why would Camden Council, as a result of the discriminatory HCA concessional clause, leave itself potentially legally liable and certainly accountable for approving development in a high risk setting that results in property damage and evacuation difficulties?***

**THE HCA CONCESSIONAL DEVELOPMENT CLAUSE IS DISCRIMINATORY AND INDEFENSIBLE AND MUST BE DELETED.**



## HCA 2022 FLOODING



**Recently approved development Argyle St**



**Elizabeth St towards Exeter St  
Approved (unbuilt) seniors living and recently  
approved (unbuilt) no. 20 redevelopment**



**Edward St towards Argyle St**



**Corner Exeter St and John St opposite approved  
and built seniors living**



**Recently approved (unbuilt including residential)  
11 Mitchell St and towards Edward St**



**Approved (unbuilt) large addition Milk Factory Corner  
Edward St and Argyle St**



## **DRAFT FLOOD RISK MANAGEMENT POLICY IS NOT BASED ON UP-TO-DATE INFORMATION**

As the exhibition preamble states, Camden's Flood Risk Management Policy<sup>7</sup> needed to be updated to reflect changed requirements, which presumably are those commencing on 14 July 2021 as covered in NSW Planning Circular, PS 21-006, guidelines and other accompanying documents<sup>8</sup>.

We note that Camden's Policy has not been updated since 2006. No doubt this creates a sense of urgency in complying with the 2021 requirements. According to the NSW Flood Manual (2005, 2.7; 2022, 4.6) reviews are necessary every five years and, importantly, after an event that is not consistent with risk management plans.

The 2012 Terms of Reference of Camden's Flood Risk Management Committee are consistent with the NSW Flood Manual although the community representatives, number and minutes of meetings are not available at the time of writing. It is not clear how the Committee has provided a forum for technical, social, economic and ecological issues or achieved its main objective of assisting Council in the review, development and implementation of floodplain risk management plans.

The recent successive floods in Camden would be expected to be a major agenda item for the Committee. This series of flood events were/are not consistent with management plans, were certainly not predicted, resulted in significant damage to infrastructure and untold losses to property and income, rescues of livestock, mental anguish and fear that Camden would go the way of Lismore.

The community considers that the Report of the independent expert NSW Flood Inquiry<sup>9</sup>, released on 17 August 2022, into the 2022 catastrophic flood events across NSW, is completely relevant to Camden. The NSW events included Camden as referenced in the Inquiry. Camden has experienced unusual frequent flooding<sup>10</sup>, with the latest event last month (July 2022)<sup>11</sup> and flooding is forecast to continue. NSW Government declared natural disasters in many LGAs including Camden.

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<sup>7</sup> Camden Council 2006 *Flood Risk Management Policy 3.19* Available at <https://www.camden.nsw.gov.au/assets/pdfs/Council/Policies/Flood-Risk-Management.pdf>

<sup>8</sup> NSW Government *Keeping our communities safe* Available at <https://www.planning.nsw.gov.au/flooding>

<sup>9</sup> NSW Government 2022 *NSW Flood Inquiry* Available at <https://www.nsw.gov.au/nsw-government/projects-and-initiatives/floodinquiry>  
Available at <https://youtu.be/zFqRaQ2qq3E>

<sup>10</sup> 7 NEWS 8 April 2022 *NSW Flood Nightmare: Camden homes and businesses flooded for a THIRD time in 2022*

<sup>11</sup> Kayla Osborne and Jess Layt 5 July 2022 *Devastation returns to Camden in fourth flood of year* The Rural  
Available at <https://www.therural.com.au/story/7806624/devastation-returns-in-fourth-flood-of-year/>

We cannot be confident that the studies and mapping included in this Exhibition are up to date. The cover pages of the documentation, upon which the draft Policy is based, are headed up as 2022, when the effective report dates are earlier and prior to the floods of 2021 and to date of 2022. For instance

- > *Nepean River Floodplain Risk Management Study & Plan Including Narellan Creek (Final Draft Report)* is dated 20 September 2019;
- > *Nepean River Floodplain Risk Management Study & Plan Including Narellan Creek: Appendix A – June 2016 Event Assessment (Final Draft Report)* is dated 7 April 2017;
  - > *Appendix B: Nepean River FRMSP Flood Behaviour* is dated 24 September 2020;
- > *Appendix C – Arr 2016 Assessment (Final Draft Report)* is dated 8 August 2019 and other appendices D to J are dated mainly August 2019

No explanation has been provided in the exhibition as to how the latest frequent flood events have been factored into the draft Policy. It was good luck not good management that Camden experienced successive moderate floods, not a major flood or potentially a flood event like Lismore's. A major flood this year is considered likely in Camden.

We also cannot find any documentation to show that the local community was interviewed and consulted to provide valuable lived experience data, of which there is a wealth within the Camden community, and which would have provided another level of assurance that the modelling was based on all available evidence.

***(17) Why doesn't the exhibition include all available and up-to date information and/or explain how it has been collected and used to inform flood policy and floodplain management?***

## CLIMATE CHANGE HAS NOT BEEN PROPERLY CONSIDERED

We must question the scientific foundation of the assumptions used to account for climate change and its extreme weather events in the documentation.

We note that the data of the studies did not predict the recent and unusual floods.

*Final Draft Risk Management Study and Plan* (20 September 2019, 9.11) notes that Council does not have a formal climate change policy. It provides no explanation for the blanket adjustment in climate effects of 10%.

It is unlikely that Mother Nature is aware of that neatly rounded percentage constraint on rainfall and flooding events over Camden.

This study (9.11) also states: *Under the 10% rainfall increase, levels increased by 0.5m to 0.75m at Camden CBD, with levels increasing downstream to over 1.5 at the confluence of Bringelly Creek.*

The freeboard requirement in the HCA, most of Camden's CBD is 0.5m, certainly not 0.75m.

***(18) Again, we ask, how is the HCA/CBD concessional development clause reasonable and who benefits?***

***(19) How is the flood risk in the HCA/CBD managed?***

The LGA's usual FPL freeboard of 0.5m, in a worst-case scenario could be subsumed by 2030 (Table 9.6) based on the unexplained 10% climate change effect.

In seeking answers to our question on how climate change was modelled we were also told that the FPL freeboard would accommodate increased flood levels. As is clear from the discussion (9.11), this answer is wishful thinking not an adaptation to climate change based on any scientific risk assessment or modelling.

***(20) How is this responsibly preparing for the future of climate change on the floodplain?***

The draft Policy creates extra confusion about how Camden Council intends to adapt to climate change. For instance:

### ***Addressing Climate Change Impacts***

*Potential impacts from climate change were assessed by modelling the flood behaviour arising from increase in rainfall intensities through the flood risk management process as identified in Council's up-to-date Flood Study/Plan. The results showed that the Nepean River catchment is prone to large flood level increases as a result of the increased rainfall intensities from climate change. Under the climate change scenario, the flood levels increased by up to and over 1.5m within the catchment. (Part 3, 2.4)*

- (21) Is this potential flood impact from climate change captured by the 10% adjustment and accommodated by the FPL freeboard?*
- (22) Is and how is potential flood impact from climate change incorporated into the mapping?*
- (23) Is the additional risk of flooding from climate change already incorporated into areas subject to concessional development, or can those risky areas be expected to expand?*
- (24) As the climate change impacts do not seem to be modelled scientifically what are the risks that development will be approved on areas that were not previously mapped as flood affected (as occurred in Lismore this year)?*

The lack of explanation and assurance in the documentation must lead us to conclude that the draft Policy is quite possibly based on questionable data and mapping, is not faithfully complying with the NSW directive that climate change must be considered and is putting the community at unnecessary risk.

## **LACK OF EXPLANATION and COMMUNITY ENGAGEMENT**

Unfortunately, no clarification is included in the exhibition about how the large amount of detail in the studies, including maps, informed the draft Policy. The exhibition does not explain in direct understandable terms how the policy and studies interrelate. They are presented in different windows with their own facilities for comment, which makes comment difficult.

***(25) Why wasn't an overarching explanation provided in the Exhibition, in plain English, as to what the practical effects of findings of the studies were and their implications for the update of the policy and floodplain management?***

The exhibition provided Camden Council's telephone number for enquiries and attempts to reach the Floodplain Team through the switchboard were not always successful.

CRAG received questions from both members and non-members about what the draft Policy and revised floodplain management means in practical terms for residents and businesses. The great number of documents and level of detail, much of it technical, was difficult to navigate and raised as many questions as it answered. People, including the many who were personally affected by the recent floods, remain not only confused and overwhelmed by the detail of the exhibition but are understandably concerned about how the draft Policy addresses unsafe conditions and mitigates property damage and the congestion experienced in evacuation of large numbers of households and businesses<sup>12</sup>.

Answers to common questions of why the HCA development concession does not account for floodplain risk, and how evacuation of Camden's HCA/CBD is to be managed given choke points and early closure of roads and bridges were not apparent. Residents of the HCA have questions about how their homes and environment will be affected by the HCA concessional development clause and fear the worst.

Residents and other businesses, including in Camden's HCA/CBD, have questions about potential mitigation strategies including possible levees and if and how they will redirect floodwaters to other properties. People have questions about the cadastral mapping resolution made available which is not sufficient to determine floodway boundaries and risks to individual properties.

How evacuation of the floodplain is to be managed is a common question, especially given the road closures and traffic congestion, already experienced four times this year. The only evacuation centre on the Camden side of the river under consideration is Camden High School to which access is limited during a flood and completely cut off in a PMF.

<sup>12</sup> Channel 9 February 2022 *Camden locals flee as floodwaters force evacuation* A Current Affair Available at <https://9now.nine.com.au/a-current-affair/nsw-floods-camden-locals-receive-evacuation-order/28c4399e-b932-4c01-8cc9-d634b2208349>

Yet a centre in Camden township which has many residents, including many seniors, and where there is a hospital, food and other services is not under consideration. In any case the Narellan centre made available this year is impractical as there is only one lane over the Macarthur bridge, which quickly becomes backed up, and even that would potentially be closed in a major flood.

We consider that what people needed in this exhibition and the answers that they would seek are foreseeable and the documentation should have easily provided them.

It was commonly expressed that it is a reasonable expectation that the exhibition be accompanied or preceded by public consultation, information and question and answer sessions.

Our understanding from reading the NSW Floodplain Manual (2005, 2022) is that the process of flood risk management includes engagement with the community.

***(26) Why wasn't the community afforded information and question and answer sessions and otherwise engaged prior to the exhibition?***

On 17 August 2022, CRAG requested a meeting with the Floodplain Team and/or Planners involved so that an overarching explanation of the findings of the studies and how they informed the draft Policy could be provided and questions answered and disseminated (Appendix). As this was not possible a Councillor was approached and a meeting was then arranged on 19 August 2022 with a Director and Manager, which was much appreciated. At this meeting the submission period was extended to 11.59pm Friday 26 August 2022. The Manager took notes of the questions and issues raised to be submitted to the Floodplain Team.

We understand that there is some urgency in complying with the 2021 NSW requirements, particularly as the Camden Flood Risk Management Policy has not been updated since 2006. But unusual flood events also trigger the need for review<sup>13</sup>.

The community certainly expects that recent NSW flood events, including those that Camden has endured, be recognised and factored into how the floodplain is managed. Lived experience should inform policy.

We also submit that providing the opportunity for the community to recount their lived experiences is a prerequisite of maintaining faith with the community. No accommodation was made to consult the many Camden residents and businesses who have long dealt with flood behaviour and recovery. They can provide extremely valuable information about issues with evacuations and what is different with the recent series of floods, coming after a long drought period that has seen so much new development and increased traffic congestion.

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<sup>13</sup> NSW 2005 Floodplain Development Manual, 2.7

The community finds it insensitive that the exhibition makes no reference the very recent and potentially ongoing difficult period of flooding and that answers to their recent problems were not found.

***(27) Why is there no reference to recent and unusual flood events?***

***(28) Why wasn't the community consulted and why weren't the recent experiences of the 2022 flood events included in the data collected and used to inform policy?***

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In conclusion, the draft Policy is unclear and raises many questions. It should of course be a source of unmistakable intent and direction that the community accepts and understands.

Instead, it is apparently dismissive of the community's views and Camden Council policy on conservation of Camden's unique heritage. The HCA concessional development clause is inexplicable and indefensible. IT MUST BE DELETED.

Lack of consistency with the NSW Government response to the 2022 flooding events, including in Camden, makes no sense to the community. It does not meet community expectations that a major and definitive change in government direction is ignored.

There has been no attempt to engage the community which is directly affected by the draft Policy.

Very importantly the draft Policy does not sufficiently address safe and timely evacuation of Camden's floodplain, including Camden HCA/CBD which contains many sensitive uses including schools and senior's living.

The studies and mapping do not show how they are based on up-to-date data. They also do not incorporate long-lived and first-hand experience as valuable information on changes in flood patterns and behaviour, real-life evacuation issues and how they may be resolved.

The studies also do not explain logically, in accordance with climate science, how FPLs and concessional development are consistent with predicted climate change. It seems that Camden Council does not have a formal climate change policy. The climate change approach is out of step with societal expectations and the unexplained 10% blanket adjustment is disturbing.

It is not apparent how the studies relate to the draft Policy. The very practical issues that Camden faces are somehow lost or unaddressed in their overwhelming amount of detail. It follows that the community cannot have confidence in the draft Policy.

Camden's Flood Risk Management Policy needs to readily understood by the community. It needs to be informed by lived experience and solve problems that residents and businesses have encountered this year. It must reference recent unusual events. Community engagement is required, as well as the opportunity to have questions answered. This is essential for people to feel respected and to accept the Policy as being in the best public interest of protecting lives and property.

We trust that our questions throughout this submission will, as promised<sup>14</sup>, be answered as explanations provided and actions taken and not by assertions.

However, given their number (28) and fundamental nature we must conclude and submit that the Exhibition as it stands can only be withdrawn.

Camden's Flood Risk Management Policy must be reformulated to exclude the HCA concessional development clause, be based on current information and be understandable and acceptable to the community.

Yours sincerely

President

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<sup>14</sup> See Appendix



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**From:** Flood Plains <[Floodplains@camden.nsw.gov.au](mailto:Floodplains@camden.nsw.gov.au)>  
**Sent:** Thursday, 18 August 2022 1:16 PM  
**To:** Flood Plains  
**Cc:** [admin@crag.org.au](mailto:admin@crag.org.au)  
**Subject:** RE: Floodplain management exhibition and request

Dear  
Thank you for your email.  
Please submit all your concerns as a submission. We will address them. If required, a meeting will be arranged later.  
If maps are not clear, please call 'Floodplain Management Team' of the Council, they will direct you to maps.

The flood related development controls are outcomes of 'Floodplain Risk Management Study and Plans (FRMSP)'. For Nepean River it is in public exhibition. The Upper South Creek FRMSP was adopted by the Council in 2019 (after public exhibition). Part of it was further reviewed under the updated Upper South Creek Flood Study (currently in public exhibition).

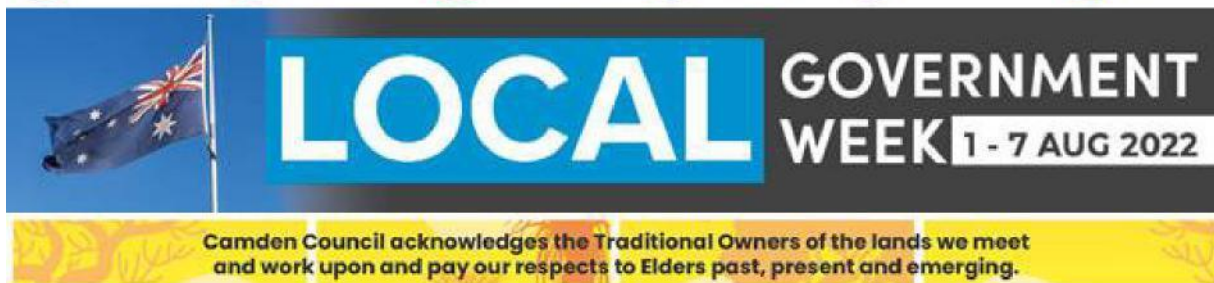
Regards

## Camden Council



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**From:**  
**Sent:** Wednesday, 17 August 2022 11:54 AM  
**To:** Flood Plains <[Floodplains@camden.nsw.gov.au](mailto:Floodplains@camden.nsw.gov.au)>  
**Cc:** [admin@crag.org.au](mailto:admin@crag.org.au)  
**Subject:** RE: Floodplain management exhibition and request

Warning - This email originates from an external organisation

Dear Floodplain team,

Thank you for your time yesterday and explanations which I have passed on to our membership. Also thank you for extending the submission date to Monday, much appreciated.

Feedback from CRAG was swift and I have summarised below the main points fed back so far. Many have expressed difficulty in getting their heads around the great number of documents and how they interconnect and asked why there are two submissions, one for policy and one for plans. Also that the mapping needs to be of higher resolution so that property boundaries in relation to flood ways and flood levels can be established. It is difficult to make a submission when there are so many exhibition documents and how they are used to inform the draft policy is not explained.

They go on to say that we need the opportunity to attend an information session so that questions can be answered and that a full overarching explanation of what the changes entail and mean going forward can be provided.

An information session would be appreciated, but if that is not possible given the timeframe, a number of people are asking for at least a meeting with Planners so that specific questions can be answered. Could this be arranged for tomorrow or Friday? If so that would be much appreciated.

Kind regards

Glenda  
cc CRAG Membership

Feedback so far as follows:

- The Heritage Conservation Area clause is not acceptable as it is really an invitation to demolish cottages and other fabric and replace them with inappropriate constructions that do not tell the story of Camden in NSW and Australian history. It is a listed conservation area, not an area for redevelopment. The first two concession categories with perhaps some tweaking are sufficient and would help protect heritage, lives and properties. We do not want a repeat of Lismore. It is foolhardy to increase development on the floodplain. Government is talking about buybacks in Lismore, Windsor etc. This is not consistent with the argument that land cannot be sterilised, yet this Policy permits more building in flood prone areas of Camden. The 1840 Macarthur town is contributory as a cultural centre, a small area of the Municipality and is very important to the community as it stands. It does not need to be overdeveloped or redeveloped to be useful. In fact that would destroy its point of difference and economic advantage. The question of who benefits by the special clause needs to be answered.
- Residents of the conservation area, many in the flood areas, need to be reassured that their homes and environment will not be destroyed by the concessional clause. They invested in good faith, relying on the planning instruments, that the area would be conserved not redeveloped. More recently the 2018 CTC Urban Design Framework also recommended that residential be included in the zoning so that the vibrancy of the town and foot traffic would be enhanced. The 2020 Local Strategic Planning Statement which aligns with the WCD Plan also has as a priority that *Local Priority L2 Celebrating and respecting Camden's proud heritage. These initiatives will ensure that Camden's valued heritage is protected from the impacts of development and can continue to be celebrated by the community.* (p. 45). We do not believe from the information to hand that the special clause is consistent with what the community wants or other Council policy.

- Residents, particularly those in Alpha Rd want to understand more about the levee options, and the likelihood of them being considered and what would be the effect of displaced floodwaters on other properties.
- How evacuation is to be managed is a big issue and needs to be explained. It seems the only evacuation centre on the Camden side of the river even being considered is Camden High School. Which would be completely cut off in a PMF, and limited access in any flood event, either to get there from Camden, or to get out to anywhere else. There is no suggestion of an evacuation centre in Camden township - where many people would be, and there are services, food and supplies, and a hospital. This is unsafe and unacceptable. Next closest would be Mawarra and Spring Farm PS, but they would be needed for people in those areas in a major event. And no good if the bypass is closed, which as experience tells us in any case becomes clogged and not everyone can necessarily reach Narellan in good time.
- There is confusion about how the effects of climate change are incorporated into the policy. Again we do not want a repeat of Lismore. The Policy at 2.4 was noted:

***Addressing Climate Change Impacts***

*Potential impacts from climate change were assessed by modelling the flood behaviour arising from increase in rainfall intensities through the flood risk management process as identified in Council's up-to-date Flood Study/Plan. The results showed that the Nepean River catchment is prone to large flood level increases as a result of the increased rainfall intensities from climate change. Under the climate change scenario, the flood levels increased by up to and over 1.5m within the catchment.*

Is this incorporated into the mapping and would this increase the concessional areas? It is not clear given the mapping is dated 2019. Again it is expressed that it is foolhardy to develop the floodplain, especially when there is ample flood free land in the LGA.

---

**From:**

**Sent:** Tuesday, 16 August 2022 1:39 PM

**To:** '[floodplains@camden.nsw.gov.au](mailto:floodplains@camden.nsw.gov.au)' <[floodplains@camden.nsw.gov.au](mailto:floodplains@camden.nsw.gov.au)>

**Cc:** '[admin@crag.org.au](mailto:admin@crag.org.au)' <[admin@crag.org.au](mailto:admin@crag.org.au)>

**Subject:** Floodplain management exhibition

Dear Floodplain team,

Could you advise whether we will be able to discuss questions from our membership today and if so could you provide an approximate time, many thanks

President

Camden Residents' Action Group Inc

Cc CRAG Committee

**Nepean River Floodplain Risk Management Study  
and Plan**

**Public Exhibition Submission**

**02\_Submission 10\_Attachment 1**

26<sup>th</sup> August 2022  
Floodplain Management Team  
Camden Council,  
PO Box 183  
Camden NSW 2570  
[mail@camden.nsw.gov.au](mailto:mail@camden.nsw.gov.au)  
[floodplains@camden.nsw.gov.au](mailto:floodplains@camden.nsw.gov.au)

**RE: Floodplain Management Exhibition**

Thank you for the opportunity to comment on this exhibition, and the extension of time to make a submission.

My comments relate to elements of the Nepean River Floodplain Risk Management Study and Plan and the updated revision of Council's Flood Risk Management Policy. I have not addressed the Upper South Creek Flood Study. Given the large volume of documents in this exhibition, I have not been able to address all aspects and I will not attempt to address the more technical elements. I appreciate the need for these studies to be updated as a priority, though obviously the recent floods and the response to the NSW Flood Inquiry will impact on the policies, and updated studies will be required.

My primary area of concern is the impacts within the township of Camden and surrounding areas. Like many locals I observed the recent 2022 flood events, and despite knowing the history of flooding, and seeing pictures, it was another thing to see the speed, scale, reach and impact of this series of moderate flood events.

We were particularly fortunate not to have a major event on at least two occasions. There was more heavy rain heading towards us when the flood was at its peak, which fortunately for this area moved towards the north and avoided the Camden area and its catchment. The experience around other areas of NSW this year tells us that floods can exceed previous records and major floods can occur multiple times a year.

I would like to see more local knowledge included in the flood policy. The volume and format of the documents may have made it difficult for many locals with firsthand experience to know how they could contribute. Community information sessions should have been held, and should be planned in the future, to allow locals to share their thoughts and experiences.

I am concerned about several aspects of the draft plan and policy, in particular: **Evacuation routes**

The nature of Camden's location, with wide stretches of flood plain and the loops of the Nepean River, make travel around the area very difficult during flood events. Most roads out of Camden rely on low level bridges to leave the area. In a moderate flood, the only access road for Camden, Camden South, all the areas to the west of Camden, and parts of Elderslie, becomes the Camden Bypass. During a flood emergency this makes evacuation difficult, hazardous, and time-consuming. In the days following it impacts the ability for everyone to travel to work, school, medical services, and access shopping and other services. Roads such as the bypass and Burragorang Rd are at a standstill, with short trips taking hours.

We accept that this is a consequence of living in this rural area, where the flood plains are the reason much of the area has remained rural and less populated. Options for high level roads and bridges are limited by the extent of the flood plain. Any further development in the area will add to the cumulative impact on evacuation routes, and this must be carefully considered.

#### **Evacuation centres**

One issue that was evident during this year's floods was the lack of a local emergency centre. Eventually one was set up in Narellan, but by then it was very difficult for anyone in a flood prone area to get there.

In the *Nepean River Floodplain Risk Management Study & Plan Including Narellan Creek (Final Draft Report)* potential evacuation centres are proposed. Many are some distance from the population that would need them.

What is needed is an evacuation shelter within Camden township. The only potential shelter identified south of the Nepean River is Camden High School. In my opinion (and I know the area well) this is a very unsuitable location. Cawdor Road to the north and south floods quickly and is cut off in even minor floods. The only way out is Burragorang Rd which is liable to flooding in major events, and in any flood event traffic in the area is often at a standstill and there is limited access. The Camden high school site would be completely cut off in a PMF, either to get there from Camden, or to get out to anywhere else. It is only accessible by vehicles, and not within walking distance of anyone needing to evacuate.

There must be a pre-planned evacuation centre in Camden township - where many people live and would be trying to evacuate from low lying areas in the town, and where there are services, food and supplies, and a hospital.

#### **Flood mitigation measures**

Among the mitigation measures considered are high levees at various places around the flood prone edges of Camden and Camden south. These would only mitigate less severe floods, provide a false sense of security, and encourage more properties in flood prone areas. Those that live in these locations often do so for the rural views across the flood

plains and have accepted the flood risk. I doubt they would want high mounds of dirt across their back fences.

It would make more sense to look at buy back schemes than to attempt to surround large areas of Camden and Camden South with expensive and unattractive levee banks in an attempt to mitigate floods for a small number of properties.

### **Flood warnings and emergency events**

An improved system for flood warnings is needed. The earliest and most thorough and reliable information during this year's flood events was that which was shared by locals on social media. People did not know where to go for official information. Updates from council were mostly reposts from the SES page. Updates on road closures were sometimes delayed and unreliable. Locals asked to evacuate were unsure where to evacuate to, and in the early stages advised to go as far as Cabramatta. An improved information service from council during the flood event is necessary, so that a reliable and timely source of official local information is available both on social media and on the website.

Given how flood prone the Camden area is, very early official weather and flood warnings are essential so that animals, stock, equipment, and possessions can be moved as early as possible, to prevent these movements being conducted during the flood peak, when people are trying to evacuate. By the time evacuation orders are issued it is too late to move property and animals, and attempted removals and animal rescues place people in danger.

Flood gauges should be updated and reliable (the Camden weir gauge was out of action several times during recent flood events). The most accurate way to predict what would happen in terms of flooding during the recent flood events, was by looking at the gauge levels from Camden and upstream, and the rainfall in the catchment areas. Sharing this information more broadly would allow everyone to be more prepared. More local warning signs are required, as well as more updates from council after flood events and easier availability of flood data.

### **Loss of property**

Any construction on highly flood prone land will suffer loss in flood events. It is not sustainable for small businesses such as restaurants and service stations to lose everything to flood multiple times, as has occurred this year. Even farms and sports fields lose buildings, valuable equipment, landscaping, soil, fencing, and crops, as well as damage to surfaces. There should be very minimal new development at all in these areas. The land is not sterilised because it is not developed into something. The flood plain has remained primarily farmland and undeveloped for hundreds of years because of the flood risk. No significant construction should be permitted below the 1% AEP level including commercial and industrial. There is no merit in developing these areas. There is no merit in allowing alternate floor levels for any new commercial and industrial only within the Camden CBD. Why should property loss in this area be of less importance than elsewhere?

It does not solve the problem to raise these constructions on stilts over the flood level, as there are still potential losses on ground level and damage to infrastructure including the

supports. And access issues would be a major problem from raised areas, if the only access is highly flood prone, especially if they are substantial constructions, or tall buildings. Such constructions are unacceptable in any case in heritage areas such as Camden township. Underground basement storage should not be allowed in highly flood prone areas, give the risk of substantial loss.

### **Concessional development in Camden Heritage Conservation Area**

Given the above points, the well-known flood history of Camden, and the maps provided which indicate the extent of flooding within the historic centre of the township, there does not appear to be any logic in including a special clause for “concessional” development in Camden Township and its Heritage Conservation Area. It is unclear what is intended by this clause. The linked maps of floodways and high-risk areas for the Nepean are hard to read and it is impossible to see the detail for individual properties, but it is clear substantial areas of the HCA are high risk, and parts of the HCA are in floodways.

Obviously work to preserve and maintain historic buildings and heritage sites is needed regardless of flood risk. But only minor additions and improvements should be considered in flood prone areas, a contingency which is already covered by the first two concessional clauses.

NO substantial new development, especially residential of any type, can be supported in the high hazard flood prone areas of Camden. Much of the surrounding area and most access roads are inundated in a minor flood, and properties including homes and businesses are already impacted in a moderate flood. There should not be any new constructions or substantial additions allowed in these areas.

The area is NOT a region of active redevelopment. It is a Heritage Conservation Area. Some development and new buildings are permitted but there should be only small amounts of low scale infill in non-flood prone areas. It is not a choice between building either new flood prone buildings or building over the permitted height (over 7 metres) in the Heritage Conservation Area. The third option is to maintain current heritage and contributory buildings in flood prone areas, but do not allow further new development - for the sake of both heritage and flood safety.

The redevelopment of the old High School site is already much higher density than should likely have been permitted, and means many more people, (mostly seniors) are living in and surrounded by a flood zone. This development will place much more strain on evacuation centres and evacuation routes as it progresses. The inclusion of basement parking and storage in this development will lead to high losses when the area is flooded in a major flood. No further residential development should be allowed in any flood prone areas of Camden township.

Commercial and industrial development should not be permitted either. The heartbreaking losses local businesses suffered over the repeated floods of 2022 showed that these should not be constructed in high-risk flood zones. These developments can also bring people into



a high hazard area during a flood - people place themselves at risk attempting to remove goods and stock, and clog evacuation routes.

Camden is as it is because it is surrounded by flood plains. This has restricted development within and surrounding the town. It has been declared a conservation area because it has remained less developed, and still has many heritage buildings and retained its rural character. This land is not being "sterilised" because it is not developed. It is highly valued as it is, for its heritage, and as farmland and open space.

It is not acceptable, and it is not good policy, to include a clause that specifically appears to encourage new development, either residential or commercial/industrial, in a particularly flood prone area. The concessional clause for the Camden Heritage Conservation Area, should be removed from this flood policy.

Thank you again for the opportunity to comment on this policy.

Yours sincerely,

**Nepean River Floodplain Risk Management Study  
and Plan**

**Public Exhibition Submission**

**02\_Submission 11\_Attachment 1**

Camden Council  
70 Central Avenue  
Oran Park 2570

Email: [floodplains@camden.nsw.gov.au](mailto:floodplains@camden.nsw.gov.au)  
[mail@camden.nsw.gov.au](mailto:mail@camden.nsw.gov.au)

26 August 2022

Dear General Manager

**Re: 2022 Exhibition**

**Flood Risk Management Policy**

**Nepean River Flood plains Risk Management Study and plan**

I am writing to oppose the above draft **Flood Risk Management Policy** in its current form.

The first obvious objection to the document is that the most recent data referred to dates back to 2019. This year Camden has experienced three floods of considerable impact, (though many locals refer to them as relatively small despite the amount of damage caused.) There is a further flood predicted and again based on local experience, the coming flood may indeed be larger and more damaging. In light of this I am astonished that a draft **Flood Risk Management Policy** is issued at this time rather than waiting for at least an interim report to be available as a relevant document of high import.

Such a report should include wide public involvement, noting both historical and recent experiences. The draft on Exhibition shows no evidence that there has been any consultation with the community at any stage in its development. No residents in the Camden CBD were consulted and this is a resource of great importance. The omission is striking. Many have vivid memories stretching back over a lifetime with a wealth of knowledge that is a valuable resource.

The NSW Government is now considering the report (*NSW Government Response to the NSW Independent Flood Inquiry*) specifically about the Lismore disaster but a report with important implications to any area effected by floods, including Camden.

In part the report states:

*Of the 28 recommendations, the NSW Government has supported 6 recommendations and supported in principle 22 recommendations. Of those supported in principle, further work will be undertaken on implementation including consultation with key stakeholders. Further detail on the implementation of all 28 recommendations will be released later this year.*

One recommendation is:

*19. Disaster Adaptation Plans for All Towns*

*That, to establish realistic expectations of safe spaces to live and deliver much needed housing quickly, Government through NSWRA working with local government:*

- *build a disaster adaptation plan for each city and town, with planning instruments discouraging (and in many cases forbidding) development in disaster-likely areas ...*

... *These plans should be developed under the NSW Climate Change Adaptation Strategy.*

It makes little sense to rush ahead and produce a document based on historic information that ignores recent events, and that may well be out of date when the State's plans are released. It would also help if Council developed a climate change policy, something that seems relevant when drafting a flood policy.

### *Sterilized Land*

The dictionary offers several definitions, but perhaps the most relevant is *Unfruitful, unproductive*. To describe land that is not built upon as *sterile* is provocative. Tell that to farmers and gardeners and run the risk of ridicule. Green spaces are not only necessary but in an environ like Camden are essential to the character of the township. And this brings me to the most important objection in the whole policy: **Concessional Development**. Three categories are nominated in the draft Policy (7.3.7). Of these it is the third where things are turned up-side down. An area defined as an HCA is by definition an area to be *Conserved*. This document, without explanation, ring fences it as the one area *for all categories of concessional development*.

This document was either hastily prepared or mischievously constructed. If it benefits anyone it is certainly not the town's folk. Indeed, its implications are decidedly deleterious. A new policy needs to be developed that is cognizant of local knowledge, consistent with NSW Government policies as they are developed and reflect and respect local needs, especially within the HCA.

Thank you

**Nepean River Floodplain Risk Management Study  
and Plan**

**Public Exhibition Submission**

**02\_Submission 12\_Attachment 1**

**Attachment to Submission re Floodplain Management Policy (submitted earlier today):**

Although I could find no mention of it in the papers that I dealt with in trying to grasp the directions of the proposed policy, I don't feel it is right to discuss Floodplain Management without addressing a clear 'elephant in the room', the issue of raw sewage being discharged into the Equestrian Park and the subsequent impact.

***Could you please answer the following questions?***

- Why is this being done (raw sewage discharge into public land)?
- Why have the public not been informed or given the chance to debate the matter?
- \* Where are the issues around this to be dealt with in the floodplain management documents?
- \* Is this the reason that the Equestrian Park has been closed to the public for time well beyond what the drying out of pathways etc require?
- What are the remediation plans to date? What is the time scale for same?

I would argue that this is a serious matter and must be dealt with, not 'hidden' and avoided.

I sincerely await your answers.