
**MAV SUBMISSION TO THE
DISCUSSION PAPER – PORT PHILLIP AND WESTERNPORT
FLOOD MANAGEMENT AND DRAINAGE STRATEGY**

APRIL 2007

INTRODUCTION

The Municipal Association of Victoria (MAV) is the peak body for local government in the State of Victoria. Under the *Municipal Association Act 1907*, the MAV is required to represent all 79 local governments in the state.

The MAV welcomes the opportunity to provide comment and inform the development of the Discussion Paper for the Port Phillip and Westernport Flood Management and Drainage Strategy. The MAV considers the development of the Strategy important; recognising the increased frequency and intensity of major flood events across the catchment. This submission is made by the MAV as part of an ongoing commitment to support the role of local government in flood management and drainage; as a statutory planning authority, public land and asset manager, and as a community leader and educator.

The MAV is broadly supportive of the directions being pursued in the Discussion Paper, however, raises herein some particular areas of interest and concern of our membership. The MAV recognises the need for the State Government and municipal councils to work together, and with the community, to identify the actions necessary for achieving reduced flood risk into the long-term future.

The MAV commends Melbourne Water for the efforts to date to engage councils in the development of the Discussion Paper through the council workshop series and participation on the Project Steering Committee. The Association is keen to see further opportunities for involvement of councils of the Port Phillip and Westernport region in the finalisation of the Strategy, and in particular the development of any accompanying implementation plan, to ensure that the sector has confidence in the process and decisions made in the strategy.

The MAV also encourages the State Government to avail itself of the opportunity to learn from the local government sector's experience in flood management and drainage across the region; such that the options progressed in the development of the Port Phillip and Westernport Flood Management and Drainage Strategy are well grounded and practical in their application.

RECOMMENDATIONS

- ❑ The MAV calls for a substantially accelerated program of funding to manage the risks, starting with those properties deemed as being at 'intolerable risk'. An accelerated funding program would need to be committed as recurring for the next ten years.
- ❑ In determining how funds are allocated to the management of risk, the MAV considers it appropriate that the focus for structural works is on those works that remove 'intolerable' risks. However, this must be concurrent with non-structural responses that support communities to understand and prepare for 'tolerable' flood events, and importantly, 'intolerable' flood events in the intervening period before the risk is removed.
- ❑ To ensure acceptance of the balance between structural works and non-structural measures the MAV encourages a dedicated and extensive dialogue with all stakeholders including 'at risk' communities.

- ❑ In considering how the required level of response to risk is funded, the MAV calls on the State Government through its central budget to resource Melbourne Water, local government and other agencies to undertake the necessary activities. Whilst the community can and does pay for a level of flood mitigation it is not reasonable to expect communities to have the capacity or willingness to pay for the acceleration of works, be that through Melbourne Water administered charges or municipal rates.
- ❑ The MAV considers an improved knowledge base is critical to enable an appropriate regard for and response to flooding risk. In collecting this data it is essential that a consistent methodology be used. The determination of risk and mapping of 'at risk' locations must have regard for the potential impacts of climate change. Further, the knowledge base must encompass a quantitative and qualitative assessment of the social impact of flooding, both in terms of preparedness and recovery of communities to flood events.
- ❑ Prior to adding to the knowledge base it is essential that there is an agreed standard on the scale of mapping, such that all flood managers are working with a common and locally informative data set. Further, this agreed standard should be applied statewide and not just in the Melbourne Water region of responsibility.
- ❑ As new information becomes available about the severity and location of properties at risk from flooding, this should be made available to relevant councils for inclusion in the local planning schemes. Any associated planning scheme amendments should be facilitated and funded by the State Government to avoid delay in this process.
- ❑ The MAV encourages that responsibility for the coordination and delivery of community education, flood awareness and preparedness vests with a single State Government agency able to become the centre for expertise on flooding and flood communication. The State Emergency Service of Victoria (VICSES) may be one such appropriate agency. The VICSES, or other coordinating agency, would need to be provided with sufficient human and financial resource to undertake this role.
- ❑ Further to the previous point, whilst councils do not have the resources or necessarily expertise to have a lead role in community education and preparedness, a complimentary role could be negotiated with the local government sector.
- ❑ In designing and delivering programs for community it is imperative that those agencies communicating the risk and response messages are consistent and honest with the community.
- ❑ The MAV encourages debate on the expectations and responsibilities of the various flood management agencies. As part of the development of the Port Phillip and Westernport Flood Management and Drainage Strategy the questions should be asked: are the current arrangements the most appropriate to take forward?; is the delineation between Melbourne Water and council management of sub-catchments the most effective way to achieve a reduction in flooding risk?; and should there be a single regional, or statewide, flood management and drainage authority?
- ❑ The MAV also seeks that the development of the strategy be mindful of the impacts or unintended consequences of proposed directions on other regions and the state as a whole.

COMMENTS ON THE DRAFT STRATEGY

The following comments, under relevant headings, are offered for consideration in the finalisation of the Port Phillip and Westernport Flood Management and Drainage Strategy. The issues and ideas presented herein are a reflection of the diversity of matters that the MAV's membership has raised with the Association.

ISSUE 1 – AN AGREED APPROACH TO MANAGING EXISTING REGIONAL FLOOD PROBLEMS

The Discussion Paper states there are more than 100,000 properties in the Port Phillip and Westernport region that are at risk of flooding in up to a 1% annual exceedence probability event. The MAV is concerned that current investment by the State Government, through Melbourne Water, to reduce the consequence of these flood events is having little impact on reducing the actual number of 'at risk' properties. Further, that the current level of funding is not commensurate with the social and financial impacts of flooding.

The MAV calls for a substantially accelerated program of funding to manage the risks, starting with those properties deemed as being at 'intolerable risk'. An accelerated funding program would need to be committed as recurring for the next ten years.

In considering the definition of 'tolerable' and 'intolerable' risk the MAV is supportive of the definitions proposed by Wyndham City Council, with minor additions. That is, 'intolerable' is where flooding threatens public safety, inundates the floors of houses and/or places of business and priority amenities that service vulnerable members of the community such as medical facilities, schools, kindergartens/ child care centres or aged care facilities. Further, 'intolerable' is in part a measure of the severity of dislocation. 'Tolerable' could be defined as flooding of external areas surrounding properties, including landscaped areas, car parks and roadways.

The MAV acknowledges that infrastructure based flood mitigation projects and engineering solutions will never remove all flooding risk, nor in the short to medium term future mitigate all 'intolerable' risks. Therefore, effort and funding must also be made available to improve community preparedness for flood events, as addressed in the MAV's response to Issue 4.

Achieving an acceptable balance between structural works and non-structural measures and levels of protection will be a key challenge in the development of the Port Phillip and Westernport Flood Management and Drainage Strategy. In determining how funds are allocated to the management of risk, the MAV considers it appropriate that the focus for structural works is on those works that remove 'intolerable' risks. However, this must be concurrent with non-structural responses that support communities to understand and prepare for 'tolerable' flood events, and importantly, 'intolerable' flood events in the intervening period before the risk is removed.

To ensure acceptance of the balance between structural works and non-structural measures the MAV encourages a dedicated and extensive dialogue with all stakeholders including 'at risk' communities. It must be acknowledged that, broadly speaking, everyone thinks that their own potential flood impact is intolerable, whereas communities must be supported to understand that there is a continuum of tolerability from 'inconvenient' through to 'intolerable'. Only when these communities have an understanding of the rationale for the efforts of governments will they be likely to deem the definitions and response to risk as acceptable.

In considering how the required level of response to risk is funded, the MAV calls on the State Government through its central budget to resource Melbourne Water, local government and other agencies to undertake the necessary activities. Whilst the community can and does pay for a level of flood mitigation it is not reasonable to expect communities to have the capacity or

willingness to pay for the acceleration of works, be that through Melbourne Water administered charges or municipal rates. A reliance on existing funding streams will not be able to accommodate the required removal of intolerable risk.

ISSUE 2 – COMPLETING THE KNOWLEDGE BASE

The Discussion Paper states that flood mapping and an understanding of communities affected by flooding is necessary to assist in the benefit-cost analysis for flood mitigation works and community awareness / preparedness efforts. The MAV agrees that an improved knowledge base is critical to enable an appropriate regard for and response to flooding risk. A priority action in the development of the Port Phillip and Westernport Flood Management and Drainage Strategy must be to complete the knowledge base, with funding coming from the State Government and coordination through one of its agencies that operates statewide.

In collecting this data it is essential that a consistent methodology be used. The determination of risk and mapping of ‘at risk’ locations must have regard for the potential impacts of climate change. Further, the knowledge base must encompass a quantitative and qualitative assessment of the social impact of flooding, both in terms of preparedness and recovery of communities to flood events. It must be recognised that recovery is not only about the reconstruction of physical infrastructure, but also the restoration of the emotional, social, economic and physical wellbeing of communities; these latter areas are a substantial gap in current knowledge about flooding.

A further knowledge gap, and directly influenced by climate change, is the flood risk to bayside and coastal councils from storm surge events.

Prior to adding to the knowledge base it is essential that there is an agreed standard on the scale of mapping, such that all flood managers are working with a common and locally informative data set. Further, this agreed standard should be applied statewide and not just in the Melbourne Water region of responsibility.

As new information becomes available about the severity and location of properties at risk from flooding, this should be made available to relevant councils for inclusion in the local planning schemes. Any associated planning scheme amendments should be facilitated and funded by the State Government to avoid delay in this process. As the Discussion Paper states in Issue 4 it is costly and time-consuming to councils to undertake planning scheme amendments and councils have expressed concern about their capacity to administer the amendments and associated permit processes. Absence of resource being made available to councils for this activity will impede the inclusion of flood information in planning schemes.

Information about flooding risk must also be readily available to property owners and those considering the purchase of property.

As part of the development of the Port Phillip and Westernport Flood Management and Drainage Strategy, the MAV encourages the State Government through Melbourne Water to explore the role of the insurance industry in contributing expertise and resources to the research and mapping for a complete knowledge base.

The MAV supports the development of an on-going flood impact research program and considers a State Government agency modelled on the Country Fire Authority’s approach to fire should be established. This would create a centre of flood expertise and enable this agency to provide information to the public and all flood managers on ‘at risk’ areas and appropriate management and preparedness response.

ISSUE 3 – POTENTIAL LONG TERM FUTURE PRESSURES ON THE EXISTING DRAINAGE SYSTEM

As stated in the Discussion Paper it is projected that between 2006 and 2031 the population of Melbourne will increase by approximately 860,000 adding over 510,000 new households to the metropolitan area. With the promotion of greater urban density and in-fill through the State Government's Melbourne 2030 Strategy, there must be subsequent regard for potential increased pressures placed on the existing drainage system in the Port Phillip and Westernport Region.

The knowledge gap on the location of flooding risks must be swiftly completed to inform the development approvals processes for these new and in-fill developments, for example, the determination of floor levels.

The MAV commends that Melbourne Water is preparing strategies for individual catchments where significant redevelopment is occurring, to identify the potential impact on drainage services, what additional infrastructure may be required and the cost associated with these works. Whilst a portion of these costs may be levied from developers and communities, through current charges and rates, this will not be sufficient to enable all required infrastructure works. As such, the previously mentioned commitment of State Government central budget will be required to accelerate these works.

ISSUE 4 – ENHANCED COMMUNITY EDUCATION, FLOOD AWARENESS AND PREPARATION

The MAV shares the view expressed in the Discussion Paper that there is a significant gap between community awareness and agency flood knowledge. As stated in the Discussion Paper the risks associated with flooding and urban flash flooding, in particular, are poorly understood in the community. This lack of understanding limits the effectiveness of flood warning systems and the community's ability to prepare and respond to emergencies.

The MAV encourages that responsibility for the coordination and delivery of community education, flood awareness and preparedness vests with a single State Government agency able to become the centre for expertise on flooding and flood communication. The State Emergency Service of Victoria (VICSES) may be one such appropriate agency. The VICSES, or other coordinating agency, would need to be provided with sufficient human and financial resource to undertake this role.

Local government could reinforce the efforts of a central coordination agency; recognising that municipal councils are often the first point of contact for community seeking flood information and advice and already provide a range of services in times of flooding events:

- Coordination and provision of personal support services
- Volunteer coordination
- Community communications
- Identification and support of vulnerable populations

Whilst councils do not have the resources or necessarily expertise to have a lead role in community education and preparedness, a complimentary role could be negotiated with the local government sector.

In undertaking the enhancement of current community education and preparedness activities it is recommended that the State Government adapt the highly successful Country Fire Authority model for working with communities on fire risk and preparedness. Programs such as Community Fireguard and Bushfire Blitz have demonstrated the ability and willingness of community members to take responsibility for the preparedness and protection of their personal safety and

assets for fire events. As a goal it would be desirable for the community to also assume responsibility for preparedness and response during flood events.

In the development of the Port Phillip and Westernport Flood Management and Drainage Strategy the MAV encourages Melbourne Water to look at what is being developed by the VICSES, Benalla Rural City Council and the Rural City of Wodonga as a community flood / storm awareness and education program. This program is modelled on aspects of the NSWSES FloodSmart and StormSmart programs with elements drawn from the CFA and South Australia Country Fire Service's Bushfire Blitz and CFA/DSE/MFESB's FireSafe Victoria programs as well as other community flood management programs internationally.

In designing and delivering programs for community it is imperative that those agencies communicating the risk and response messages are consistent and honest with the community. Further, the messages should be provided with regular reinforcement.

ISSUE 5 – AGREED RESPONSIBILITIES AND IMPROVED COLLABORATION BETWEEN FLOOD MANAGEMENT AGENCIES

The MAV shares the view put forward in the Discussion Paper that collaboration between flood management agencies is essential for developing coordinated and integrated flood management programs and activities. Collaboration also optimises the efficient and effective delivery of flood management responses; particularly in the context of limited resources available to undertake this work. A pre-cursor to collaboration is clear articulation of formal responsibilities and assumed roles, as well as mutual expectations and capacities. Where there are identified inconsistencies in expectations and responsibilities the regulatory framework for flood management and drainage should be examined to determine if at that regulatory level the inconsistencies or inadequacies arise. Where this is the case, these must be resolved through a regulatory reform process.

The MAV encourages debate on the expectations and responsibilities of the various flood management agencies. As part of the development of the Port Phillip and Westernport Flood Management and Drainage Strategy the questions should be asked: are the current arrangements the most appropriate to take forward?; is the delineation between Melbourne Water and council management of sub-catchments the most effective way to achieve a reduction in flooding risk?; and should there be a single regional, or statewide, flood management and drainage authority?

The MAV also seeks that the development of the strategy be mindful of the impacts or unintended consequences of proposed directions on other regions and the state as a whole.

CONCLUSION

In conclusion the Municipal Association of Victoria welcomes the opportunity to provide comment on the development of the Port Phillip and Westernport Flood Management and Drainage Strategy. The Association is keen to see further opportunities for involvement of municipal councils in the finalisation of the strategy, to ensure that the local government sector has confidence in the process and decisions made.

Critical to achieving support for the finalisation and implementation of the Strategy will be the ability of the State Government to clearly articulate the respective roles, responsibilities and resourcing needs and capacities of the various implementation agents; including local government, water and drainage authorities, government departments and agencies, and Catchment Management Authorities. The MAV is particularly interested in working with the State

Government to identify how it is anticipated that local government will play a role in implementation of the Strategy's actions, and in line with this, how the State Government proposes to secure the funds and additional resources to enable implementation of required actions.

The MAV looks forward to further dialogue with the State Government and its agencies in the development of the strategy.

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