

Medium Flood Risk Case Study: Hospital planning proposal

Practical application of planning circular PS 24-001: Update on addressing flood risk in planning decisions

In line with the recommendations of the 2022 NSW Flood Inquiry, the department's planning circular PS 24-001 recommends planning authorities apply a risk-based approach to assessing proposals involving flood-affected land. This includes planning proposals, local and regional development applications, State significant development and State significant infrastructure.

The risk-based approach includes ensuring that:

- the level of assessment undertaken for a planning proposal or development proposal is proportionate to the likely impacts of the proposal, including taking into account the flood risk profile of the proposal
- planning decisions are based on a balanced consideration of the merits, risks and impacts of a given proposal, and that appropriate measures are in place to achieve a tolerable flood risk level for flood-affected proposals.

The approach should take into account the flood risk profile of each proposal, including consideration of the flood characteristics for the location, the nature and type of development and any impacts on the existing community and surrounding properties.

The following case study shows how the circular can be applied in the assessment of a medium flood risk planning proposal for health services facilities on flood prone land.

Proposal Overview

A planning proposal for health services facilities was lodged with the department for Gateway determination. The planning proposal was to amend Councils Local Environmental Plan to allow redevelopment of the hospital and expand health services facilities in the precinct. The proposal will rezone land from R3 Medium Density Residential and B5 Business Development to SP2 Infrastructure (Health Service Facilities). It will also amend the height of buildings from 10 m to 18 m and will remove the floor space ratio to facilitate the redevelopment of the 2 sites for a hospital and associated medical uses.

Flood risk associated with the proposal

Flooding at the subject sites and surrounds is derived from overland flooding. The site is also mapped as flood storage and sits adjacent to a floodway (up to the probable maximum flood).

The planning proposal was identified by the department as medium flood risk because the development is located in a high-risk catchment as identified in the NSW Flood Inquiry. The flood risk for the streets within the development were identified in council mapping as low-to-medium risk, and surrounding streets were shown as high risk.

For these reasons, the department determined it needed further information to better understand the behaviour and risks of floodwater on the sites.

Additional consideration of flood matters

Consistent with circular PS 24-001, the department sought additional information and technical advice to inform its assessment, including consistency checks against Section 9.1 Ministerial Direction 4.1 Flooding.

The advice provided was based on the following considerations:

- hospitals being a sensitive land use in respect to flood risk, noting, there are existing health facilities on the sites with recent improvements completed
- increase in height will cause an overall intensification of land use
- both sites have a second level located above the PMF level of 6.7m (AHD), which potentially could be used for onsite refuge in a flood event
- development controls would be applied to ensure that risk to property and life associated with the flood behaviour is managed.

The flood advice concluded that, while it is not ideal for the proposed uses to be located in a flood-prone area, the planning proposal would not impact the existing flood risk to the ground floor of the facility. Additionally, the proposal would provide increased floor space above the probable maximum flood level which could be utilised as a refuge in the event of a major flood. Therefore, the proposal could proceed to finalisation.

In recommending that the planning proposal proceed to finalisation, the department weighed up the relative flood risk with the strategic and site-specific merit of the planning proposal, including the benefits it will provide to the local community. It also determined the inconsistency with Section 9.1 Direction 4.1 Flooding was of a minor nature.

The department found that appropriate mitigation measures would manage flood risks to a tolerable level and would need to be incorporated into the future design of the health service facility at the development application stage. Relevant plans, including a flood emergency response plan, would need to be submitted as part of any future development application.