

Our reference: ECM 875836 SE/MB

13 August 2026

Mr Craig Holden
Chair
State Planning Commission
GPO Box 1815,
Adelaide SA 5001

Emailed: PlanSASubmissions@sa.gov.au

Dear Mr Holden

Submission on Draft State-Wide Flood Hazard Code Amendment

LGA South Australia (LGA) appreciates the opportunity to provide feedback on the draft State - wide Flood Hazard Code Amendment (draft Code Amendment) released for public consultation on 21 May 2026.

LGA supports the broad intent of the proposed reforms to establish a consistent, state-wide approach to flood hazard mapping and policy while providing a more streamlined and responsive process for maintaining and updating flood hazard overlays within the Planning and Design Code (the Code). Effective and contemporary flood hazard mapping is critical to supporting informed land use planning, managing risk to communities and infrastructure and providing greater certainty for councils, communities and the development industry.

Streamlined Code Amendment Process and Flood Hazard Practice Direction

LGA is supportive of the proposed amendments to Part 1 of the Planning and Design Code which enables an overlay to be amended in accordance with a practice direction under section 42 of the *Planning, Development and Infrastructure Act 2016* (the Act).

This approach will facilitate timely amendments to the flood overlays, negating the need for an onerous and costly code amendment. This approach also supports the federal government's directive for more streamlined planning processes.

In support of this initiative, LGA recommends that a Practice Direction be prepared in partnership with the local government sector and LGA. The Practice Direction should specify the procedural requirements, including the evidence and documentation required to initiate the amendment, allocation of responsibilities for the endorsement and approval of the amendment and procedural timeframes for both the applicant and the Minister for Planning.

At a minimum, the Practice Direction should be a consultable draft before finalising the Code Amendment.

Flood Hazard Overlay Policy

LGA acknowledges that there has been significant undertaking by the State Planning Commission in preparing the draft Code Amendment, including updated planning policy and flood hazard mapping. However, LGA notes that there is a misalignment between proposed policy and the flood hazard vulnerability curves (*UNSW Water Research Laboratory, G.P. Smith, N.M. McLuckie, and R.J. Cox (2014)*) which informed the updated flood hazard mapping.

To facilitate a transparent, risk-based planning approach, LGA recommends that the policy regime be reviewed with the intent of decoupling hazard classifications and preparing planning policy that is commensurate with the level of risk. The broad approach to planning policy proposed in each of the Overlays does not provide adequate flood mitigation or protection for people and property. While this may require additional policy or overlays, LGA believes this is necessary to accurately reflect flood risk and facilitate appropriate planning policy responses to mitigate and manage flooding events in our communities.

Definitions

The Code Amendment proposes new terminology and definitions in the overlay policy as reflected in Attachment C5. A further technical review of the new terms is required and this should consider consistency with similar terms in other overlays, policy relevance and reliance for development assessment.

Spatial Representation of the Flood Hazard Overlays

The code amendment mapping represents the spatial extent of the Overlays rather than a detailed indication of the level of flood risk. LGA recommends that the hazard classification mapping (flood depth / velocity) be made available as a reference layer on the South Australian Property and Planning Atlas (SAPPA). In addition, the relevant GIS files of the hazard classifications should be provided to councils for use in their local flood hazard and stormwater planning and spatial analysis processes. Publishing the depth/velocity layers and standardised GIS outputs also supports transparency and consistent application.

Climate Change Considerations

LGA understands that the flood studies procured for the Flood Hazard Mapping Project incorporated climate change considerations predating the Australian Rainfall and Runoff (ARR) August 2024 update. For flood hazard policy and mapping to remain current and representative of future flood risk, documentation prepared to guide future flood hazard studies should reflect the most current climate change considerations, including ARR version 4.2 and be modelled to a 2100 flood scenario.

Recognition of the Australian Disaster Resilience Guideline 7-3 Flood Hazard 2017

LGA acknowledges that regulation 19 prescribes bodies that have prepared or published a policy or other document that may be referred to in the Code (as a planning instrument) for the purpose of section 71(b) of the Act. LGA supports amendments to Regulation 19 to include the Australian Institute for Disaster Resilience as a prescribed body for the purpose of section 71(b) of the Act, who publish the *Australian Disaster Resilience Guideline 7-3 Flood Hazard 2017*.

Practice Guideline

LGA is aware that DHUD is currently preparing guidelines that will be outside of the statutory planning framework. LGA recommends that a Practice Guideline be prepared to assist in the interpretation of policy where there are dual overlays applying to the same allotment. This is particularly important where there are overlays with contradictory policy or misalignment for managing specific policy matters such as Technical and Numerical Variations (TNVs).

LGA is committed to working with SPC and DHUD on progressing this Code Amendment and drafting of the corresponding Practice Direction and Practice Guideline. If you have questions, please contact me or Sarah Elding, Planning Lead on 8224 2093 or sarah.elding@lga.sa.gov.au

Yours sincerely



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