From: [redacted]
To: Strategic Planning
Subject: Flood Planning: Ballarat Planning Scheme Amendment C217ball
Date: Wednesday, 27 May 2026 2:31:51 PM

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Dear [redacted] and the BCC Strategic Planing Team,

I write to you in comment and conjecture to your most current Ballarat Waterways Flood Study (23010262_R01_V03.docx) in finding the details of your assumed modeling of 1% AEP RCP 8.5 (2100) and find this output for the regions tributaries and hydrology to be lacking in its range and focus areas, which inadvertently excludes a number of additional flow points with potential to exacerbate saturation across the region within the set durations, namely areas of Canadian Creek and Tributaries.

In reviewing your summary, specifically pages 35 to 37, it appears your modeling has excluded several key storage points (Dams) and additional existing tributaries known and recorded to be potentially impacted by inundation of excessive rain and storm water, as per CCMA 1% AEP (100 year ARI), see attached mapping from vic gov CCMA digital GiS.

My concerns here are that if BCC is applying this recent study to planning and mitigations strategies what implications does this diluted assessment have for potential and broader impacts for the community from future developments mitigations against flooding and storm water?

Does this recent report affect councils strategic planning and is there going to be a more comprehensive application of the following for broader mitigation against potential climate change as a result?

- **planning overlays/control maps** used by councils for statutory planning decisions, and
- broader **hydrological or inundation modelling** produced by the Victorian Government and CMAs such as the Corangamite Catchment Management Authority.

in reading the report it appears council flood overlay represents the area where a formal planning control has been adopted — not necessarily the full extent of land that modelling suggests could flood under certain scenarios. CCMA itself explicitly

states that “not all flood mapping has been identified in Council’s Planning Schemes.”

So if the Victorian Government / CCMA 1% AEP (100-year) mapping shows wider inundation extents than the local council overlay, this can absolutely affect:

- infrastructure planning,
- drainage upgrades,
- levee prioritisation,
- road maintenance,
- stormwater investment,
- emergency management,
- future rezoning decisions,
- developer obligations,
- and long-term mitigation funding.

The concern often raised by residents in other regions where council modeling has excluded these factors or limited the range of flow points (Flood reports Nationally) is that areas outside an adopted overlay can become a kind of “grey zone” becoming:

- not formally regulated as flood-prone,
- lacking in maintenance management planning and consultation with relevant stakeholders
- lacking in mitigation planning and emergency response planning
- yet still identified in technical modelling as vulnerable.

I feel council should further consider these additional layers and known waterways / tributaries as evident factors and matters in planning overlays and this study because they often trigger mandatory engineering responses, minimum floor levels, drainage conditions and permit scrutiny. If an area is excluded from the overlay, those controls may not automatically apply even where flood modelling indicates risk.

Importantly, the 1% AEP flood is itself only a planning benchmark — not the maximum possible flood extent. Even the Victorian Ombudsman and CCMA guidance note that land outside mapped 1% AEP overlays can still flood during larger or changing events.

As to *why* councils exclude areas, there are several common reasons:

1. **Planning overlays lag behind updated modelling**
   Hydrological modelling is often updated faster than planning schemes. A CMA may produce newer LiDAR-based or catchment-wide modelling, but councils can take years to formally amend overlays through planning scheme processes. CCMA notes newer detailed sub-catchment modelling is still being

rolled out and shared with councils.

2. **Threshold differences**
   Councils may only apply overlays where flood depth, velocity or hazard crosses certain planning thresholds. Some shallow inundation areas may appear in state modelling but not trigger overlay controls.
3. **Different flood types**
   One map may model:
   - riverine flooding,
   - stormwater flooding,
   - overland flow,
   - coastal inundation,
   - drainage surcharge,
   - or probable maximum flood scenarios.
4. Another may show only one category.

5. **Economic and planning considerations**
   Overlay expansion can materially affect:
   - land values,
   - development potential,
   - infrastructure liabilities,
   - and political pressure from landowners/developers.
6. Councils therefore often proceed cautiously before formally adopting expanded flood controls.

7. **Confidence and resolution of data**
   Some broader state models are intentionally conservative or preliminary. Councils may wait for local calibration studies before embedding them into statutory planning controls.

What is increasingly important, though, is that agencies can no longer realistically argue they were unaware of risk once modeling exists. If other government datasets and authorities (attached) identify potential inundation pathways, that information should influence councils own reports so as to further influence future liability discussions, infrastructure planning expectations and community consultation obligations — even where overlays have not yet been formally updated.

CCMA's own guidance is fairly revealing here, so why is BCC only focussing on a limited number of 11 Waterways and limited range?

"Flooding outside the flood overlays will still occur at some stage."

As a concerned resident I hope that councils strategic planning will further review this current report and give greater consideration to the overall regions tributaries, catch points, saturation levels, geology and have this independently reviewed for assurance that such risks to the community are fully considered and applied to any

future planning and development within the region.

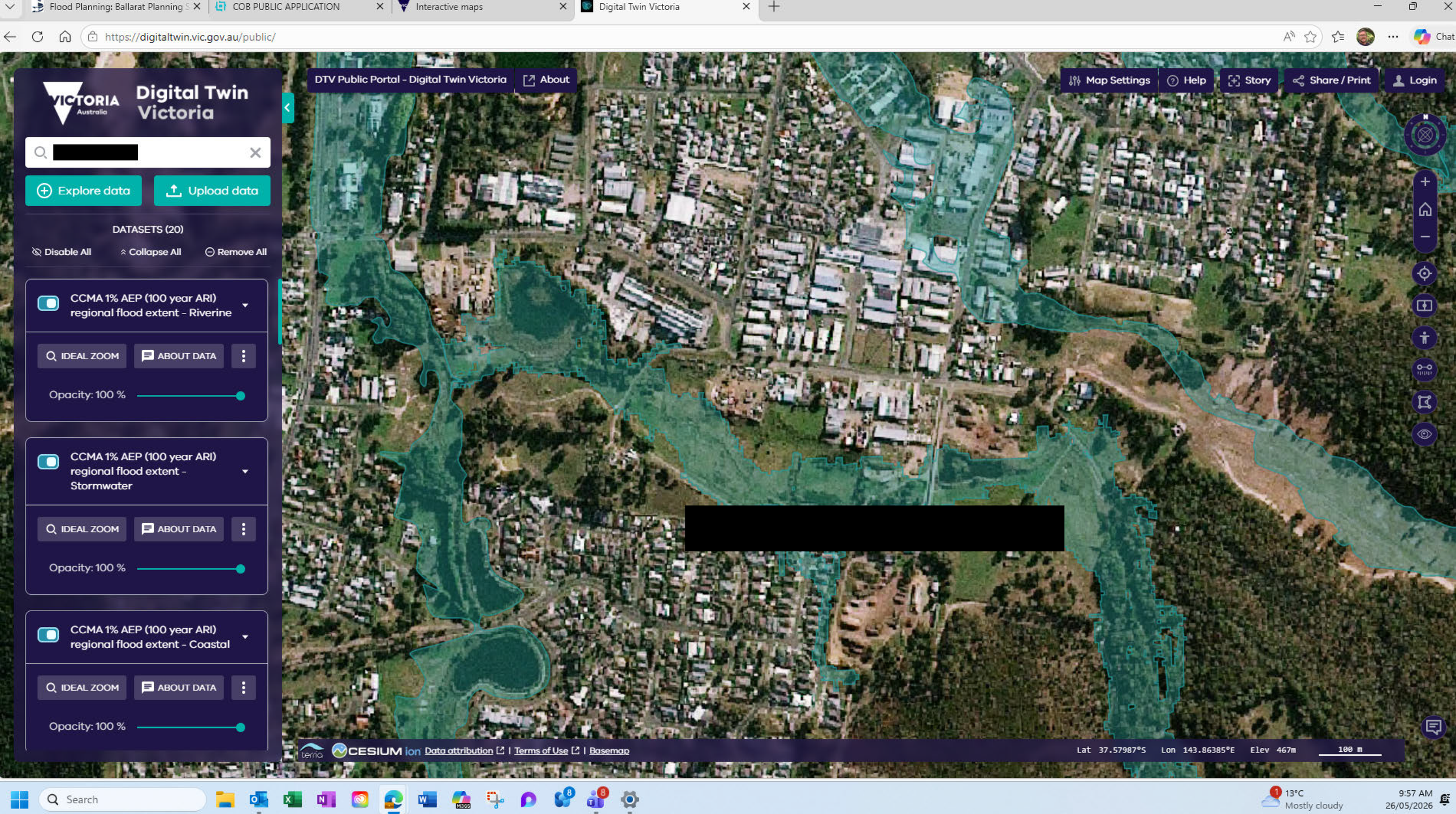
Kind regards,

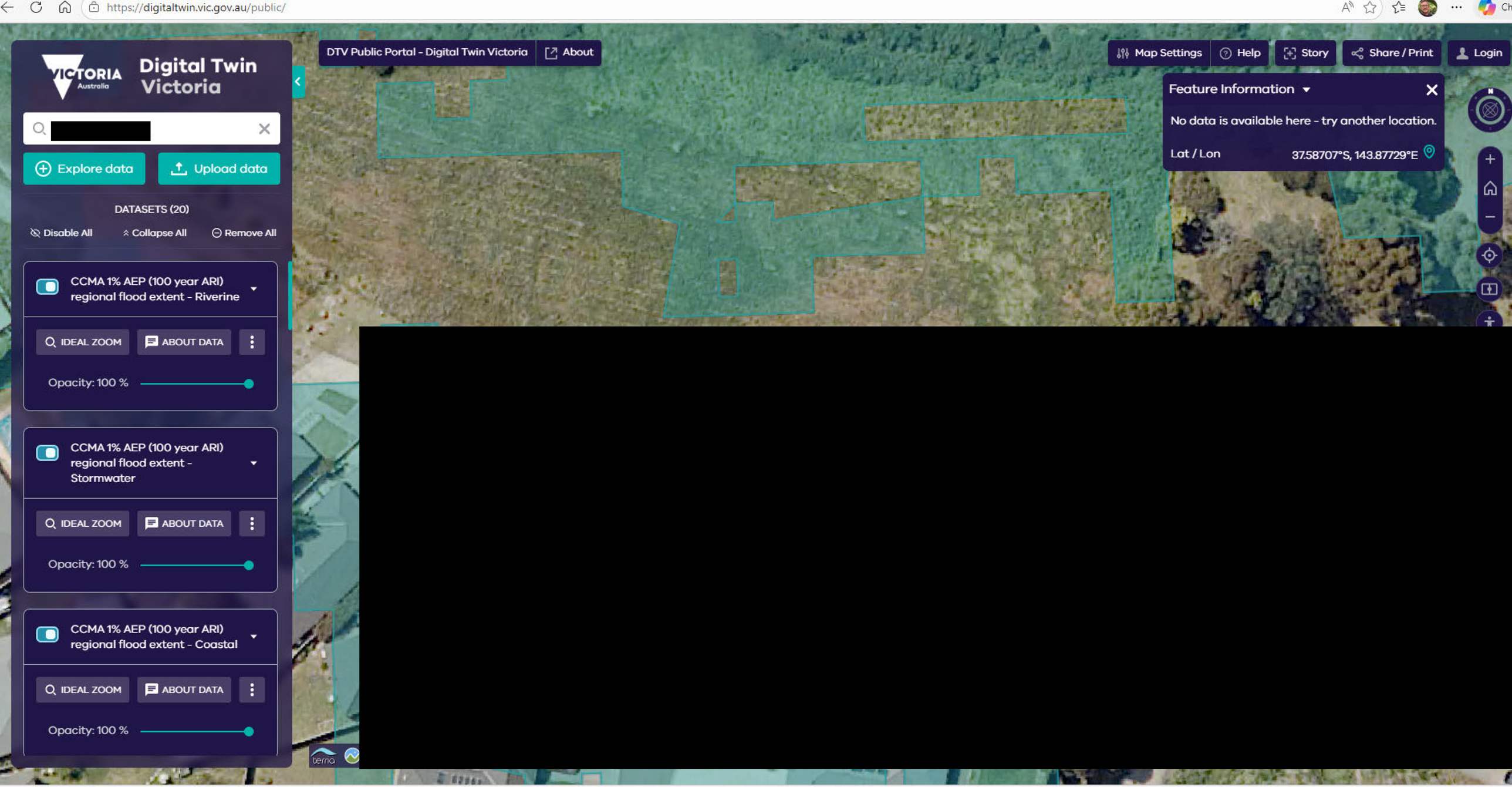
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Upload data
DATASETS (20)
Disable All
Collapse All
Remove All
CCMA 1% AEP (100 year ARI) regional flood extent - Riverine
IDEAL ZOOM
ABOUT DATA
Opacity: 100 %
CCMA 1% AEP (100 year ARI) regional flood extent - Stormwater
IDEAL ZOOM
ABOUT DATA
Opacity: 100 %
CCMA 1% AEP (100 year ARI) regional flood extent - Coastal
IDEAL ZOOM
ABOUT DATA
Opacity: 100 %
DTV Public Portal - Digital Twin Victoria
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CCMA 1% AEP (100 year ARI) regional flood extent - Riverine
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CCMA 1% AEP (100 year ARI) regional flood extent - Stormwater
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