



CMA Reference No: CCMA-F-2025-00376
Document No: 02
Date: 23 December 2025

Victorian Planning Authority
1 Spring Street
Melbourne Vic 3000

Dear [REDACTED],

RE: Submission for Public consultation on the Greater Avalon Employment Precinct (GAEP), and draft amendment c477ggee to the Greater Geelong planning scheme

I refer to your referral received at Corangamite Catchment Management Authority (Corangamite CMA) on 13 November 2025 in accordance with the provisions of *Section 19 of the Planning and Environment Act 1987*. I apologise for the delay to our response. Corangamite CMA has made an amendment to its previous response dated 23 December 2025 (CCMA reference CCMA-F-2025-00376-01). This response supersedes our previous response.

Corangamite Catchment Management Authority (Corangamite CMA) has previously provided a response to the VPA on 16 May 2025 (CMA reference CCMA-F-2025-00376) in regard to the following matters, as well as providing additional commentary about the biodiversity values and considerations within and surrounding this site. Matters previously responded to included:

1. Does the CMA support the drainage position paper?
2. Does the DPO schedule address all the documentation requirements for the drainage and servicing elements of the future development plans?
3. Does the draft DPO provide sufficient opportunity for Corangamite CMA to provide comment on future development plan applications?

Corangamite CMA would however, like to take this opportunity to reiterate and acknowledge, that we support an employment-led precinct, provided that the drainage, water quality, and ecological safeguards are demonstrably achieved before staging—particularly where discharges affect the Avalon Coastal Reserve (ACR) and the Port Phillip Bay (Western Shoreline) & Bellarine Peninsula Ramsar site.

With the recent addition of an Integrated Water Officer at Corangamite CMA, we can offer the following additional comments and considerations regarding Integrated Waterway Management (IWM) related matters.

While the framework is workable, some key considerations to continue to work through remain around:

- Environmental flow regimes to the ACR
- Outfall locations and receiving environment sensitivity
- Industrial WSUD targets and wildlife hazard mitigation near Avalon Airport
- Flood and tailwater constraints in a flat, tidally influenced landscape

Some recommendations to address the gaps before approvals through an IWM lens are as follows:

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1. Drainage Strategy & Outfalls

- Recommend a staged, precinct-wide IWM assessment before final outfall decisions, comparing ACR vs Hovells Creek using LAC metrics and climate scenarios.
- Assess interface design and invert levels to avoid risk transfer between landholders and into the neighbouring landholders.
- Set precinct IWM targets (e.g., $\geq 80\%$ TSS, $\geq 45\%$ TP, $\geq 45\text{--}60\%$ TN removal through designed IWM facilities—wetlands alone may not be adequate) plus industrial source controls and on-site treatment; require certification and audits.
- Include first-flush isolation for relatively high-risk future landholders or tenants.

Requirements on targets being defined for the precinct up front is best practice, noting also that wetlands alone may not meet those targets.

2. Environmental Flows to ACR

- Define baseflow and key flow parameters ranges to sustain ACR values; include monitoring and adaptive triggers.
- Establish annual reporting and audit systems.

3. Governance & Monitoring

- Develop a Precinct IWM Governance Plan with clear roles, monitoring sites, data standards, annual reporting, and adaptive management triggers.

Thank you again for the opportunity to be involved in the early stages of this project.

Should you have any queries, please do not hesitate to contact our office at [REDACTED]. To assist the CMA in handling any enquiries please quote **CCMA-F-2025-00376** in your correspondence with us.

Yours sincerely,



Definitions and Disclaimers

1. Corangamite CMA has assessed this application in accordance with its functions as the Floodplain Management Authority for Corangamite Waterway Management District in accordance with Sections 201 to 212 of the *Water Act 1989*.
2. Applications are assessed on their merits considering the flooding characteristics of each site. Applications are not assessed in comparison with other development applications within the area and existing precedence should not be used as an argument to allow new development to occur.
3. The Guidelines for development in flood affected areas (DELWP, February 2019) and Floodplain Development Guidelines, guidelines for development in flood prone areas (Corangamite CMA, 2022) outline the key principles used to assess development in floodplains.
4. The area referred to in this letter as the 'proposed development location' is the land parcel(s) that, according to Corangamite CMA's assessment, most closely represent(s) the location identified by the applicant. The identification of the 'proposed development location' on Corangamite CMA's GIS has been done in good faith and in accordance with the information given to Corangamite CMA by the applicant(s) and/or Council.
5. While every endeavour has been made by Corangamite CMA to identify the proposed development location on its GIS using VicMap Parcel and Address data, Corangamite CMA accepts no responsibility for or makes no warranty regarding the accuracy or naming of this proposed development location according to its official land title description.

6. **AEP** as Annual Exceedance Probability – is the likelihood of occurrence of a flood of given size or larger occurring in any one year. AEP is expressed as a percentage (%) risk and may be expressed as the reciprocal of ARI (Average Recurrence Interval).
Please note that the 1% probability flood is not the probable maximum flood (PMF). There is always a possibility that a flood larger in height and extent than the 1% probability flood may occur in the future.
7. **AHD** as Australian Height Datum - is the adopted national height datum that generally relates to height above mean sea level. Elevation is in metres.
8. **ARI** as Average Recurrence Interval - is the likelihood of occurrence, expressed in terms of the long-term average number of years, between flood events as large as or larger than the design flood event. For example, floods with a discharge as large as or larger than the 100-year ARI flood will occur on average once every 100 years.
9. **LiDAR** (Light Detection And Ranging) is an optical remote sensing technology which measures the height of the ground surface using pulses from a laser. LiDAR can be used to create a topographical map of the land and highly detailed and accurate models of the land surface.
10. **Finished Floor Level (FFL)** - the uppermost surface of the finished floor, not including any floor covering such as carpet, tiles and the like (source: Australian Building Codes Board Standard for buildings in flood hazard areas).
11. No warranty is made as to the accuracy or liability of any studies, estimates, calculations, opinions, conclusions, recommendations (which may change without notice) or other information contained in this letter and, to the maximum extent permitted by law, Corangamite CMA disclaims all liability and responsibility for any direct or indirect loss or damage which may be suffered by any recipient or other person through relying on anything contained in or omitted from this letter.
12. This letter has been prepared for the sole use by the party to whom it is addressed, and no responsibility is accepted by Corangamite CMA regarding any third-party use of the whole or of any part of its contents.
13. Neither the whole nor any part of this letter or any reference thereto may be included in any document, circular or statement without Corangamite CMA's written approval of the form and context in which it would appear.
14. The flood information provided represents the best estimates based on currently available information. This information is subject to change as new information becomes available and as further studies are carried out.

References

- [Guidelines for Development in Flood Affected Areas, Department of Environment, Land, Water and Planning, 2019.](#)
- [Floodplain Development Guidelines, Guidelines for Development in Flood prone areas, Corangamite CMA 2022.](#)
- [Construction of buildings in flood hazard areas | NCC](#)
- [Australian Rainfall and Runoff Revision Project 10 – Appropriate Safety Criteria for People April 2010.](#)
- [Australian Rainfall and Runoff Revision Project 10 – Appropriate Safety Criteria for Vehicles February 2011.](#)
- [Victorian Floodplain Management Strategy 2016](#)
- [Corangamite Regional Floodplain Management Strategy 2018-2028](#)
- [Ministerial-Direction-13-Managing-Coastal-Hazards.](#)
- [Guidelines for Coastal Catchment Management Authorities: Assessing Development in relation to Sea Level Rise](#)
- [Victorian planning schemes](#)
- [PPN11: Applying for a planning permit under the flood provisions](#)