



CONSULTATION REPORT

Response to submissions received on the draft Ipswich Plan 2024 – Flooding

PREPARED FOR
IPSWICH CITY COUNCIL

January 2024

REVISION SCHEDULE

Rev No.	Date	Description	Prepared by	Checked by	Reviewed by	Approved by
1	27/09/2023	Draft	KK / RS		SD	SD
2	10/12/2023	Draft including changes in response to Council comments	KK		SD	SD
3	13/12/2023	Final	KK			KK
4	15/01/2024	Final, minor edits to update statistics with an additional submission	KK / RMS			KK

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Executive Summary

Following a multi-year period of preparation, the draft Ipswich Plan 2024 (draft Ipswich Plan) was publicly notified by Ipswich City Council (Council) from 15 May to 16 July 2023. Of the 500 formal submissions received on the draft Ipswich Plan, 43 included comments on matters relating to flooding. This represents only 8% of the total submission cohort.

The desire to strengthen the resilience of Ipswich's communities to natural hazards and the changing climate was a core theme for the development of the draft Ipswich Plan. Council is required to address flood risk within the draft Ipswich Plan in accordance with the Natural hazards, risk and resilience state interest policies pursuant to the State Planning Policy (SPP). The SPP sets out the requirements for Councils to address flood risk through their planning schemes, including via flood risk mapping, zoning, and development controls.

The draft Ipswich Plan is an important implementation tool in Council's broader flood risk management program, underpinned by the recently adopted Ipswich Integrated Catchment Plan (IICP).

A risk-based approach has been adopted in the preparation of the draft Flood Risk and Overland Flow Overlay, zoning, and broader development controls related to flood, consistent with the requirements of the SPP. The approach is consistent with the findings of the 2012 Flood Commission of Inquiry, the Brisbane River Strategic Floodplain Management Plan, and the land use planning recommendations from the IICP.

Key issues raised in submissions

The dominant issues raised within the flood-related submission related to three core concerns:

- **Accuracy of mapping** – both in terms of how the mapped areas related to lived experience, and the revised extents used in the draft mapping suite to that included in the current Ipswich City Planning Scheme;
- **Concern for property value loss** – this was particularly raised by property owners who may not have been mapped within the flood overlay of the current Ipswich City Planning Scheme; and
- **Concern for increased insurance premiums** – again, particularly for those property owners who may not have been mapped within the flood overlay of the current Ipswich City Planning Scheme.

The table below provides a summary of the top 10 themes raised by submitters.

Table 1-1: Summary of top 10 themes raised in submissions related to flooding and overland flow

Top 10	Themes	No. (n)	Perc. (%)
1	Concern with the accuracy of the Flood risk and overland flow mapping	32	74%
2	Concern for loss of property value as a result of the identification of the property in the flood risk and overland flow overlay mapping or rezoning of the land	21	49%
3	Concern for the increase in insurance premiums as a result of the identification of the property in the flood risk and overland flow overlay mapping	15	35%

4	Concern with regulating development in the Low flood risk categories	9	21%
5	Comments on a specific code provisions	7	16%
6	Concern that development approvals and site works to mitigate flood risk have not been considered in the flood mapping data	7	16%
7	Concern with strict and inflexible requirements, limiting opportunity for future improvements to a dwelling	7	16%
8	Social injustice as a result of the identification of the property in the flood risk and overland flow overlay mapping or rezoning of the land	6	14%
9	Plain English information needs to be provided to the community on what the terminology means	6	14%
10	It is ambiguous and there is not enough information for residents to fully comprehend all the impacts of the change	6	14%

Summary of policy considerations for Council

The core concerns raised by submitters related heavily to the revised risk-based flood mapping approach used in the draft Ipswich Plan, and potential or perceived financial implications of this mapping change. Considerations for Council in relation to this in finalising the draft Ipswich Plan include:

1. The commitment to / process for refining the creek flooding mapping approach drawn from Rain on Grid (RoG) models and the overland flow path mapping approach more generally – both city-wide and in specific locations (such as Rosewood and Newtown); and
2. The manner in which lower risk categories (particularly the Very Low Risk category) are visualised and described in the mapping suite – to better articulate the limited role they play in development control for uses other than hazard vulnerable uses.

A summary of other policy and practice considerations for Council include:

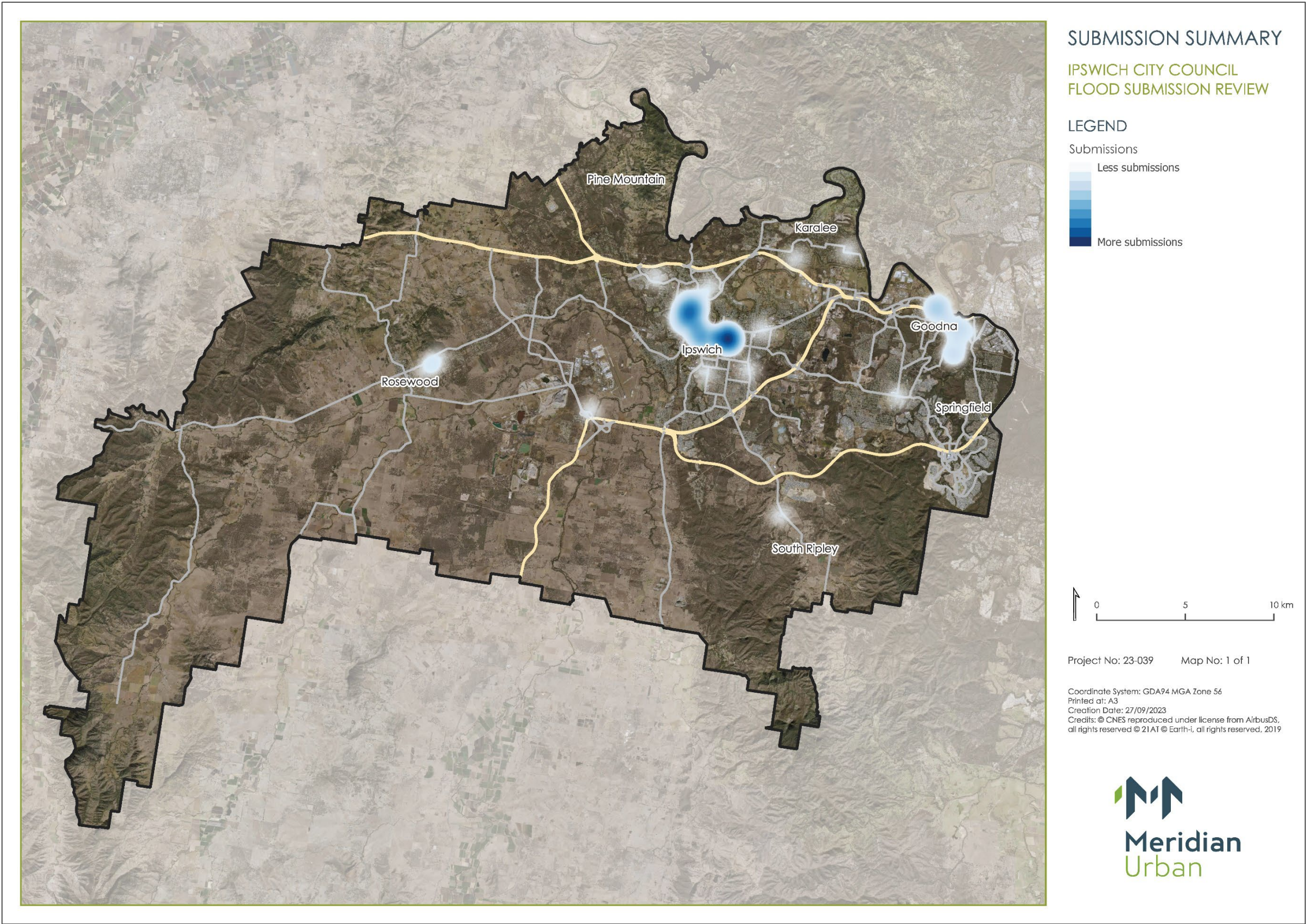
1. Addressing minor provision drafting updates for better clarity and consistency with Council's adopted policy approach;
2. Refinements to the workability and triggering of development to ensure development regulation is reasonable relative to risk;
3. Further examining the role of evacuation capability in known areas of evacuation limitation in development regulation; and
4. Possible revisions to zoning for specific sites based on existing approvals and development intents.

Geographic spread of submissions

The majority of submissions were received in relation to properties in central Ipswich, including suburbs such as Newtown, Woodend, Sadliers Crossing, and the Ipswich CBD. Goodna was another location from which multiple submissions were received.

Other locations from which submissions were received included Amberley, Barallen Point, Bellbird Park, Booval, Brassall, Camira, Coalfalls, Karalee, Raceview, Redbank, Ripley, Rosewood, and Tivoli.

A heatmap showing concentrations of submissions across the Ipswich LGA is provided below.



Ipswich City Council

Response to submissions received on the draft Ipswich Plan 2024 – Flooding

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1 Introduction

Ipswich City Council (Council) has been preparing a new planning scheme, the Ipswich Plan 2024, to help plan for their growing and changing city of the next 20 years. The draft Ipswich Plan 2024 (draft Ipswich Plan) was publicly notified from 15 May to 16 July 2023. Over 500 formal submissions were received on the draft Ipswich Plan, an increase of 250% on the submissions that were received in the current planning scheme. Of those submissions, over 40, or around 8% of the submissions, included comments on matters relating to flooding.

Council is now in the process of reviewing and considering each submission received from the community and preparing a report on the consultation.

1.1 Project purpose

As part of the consideration of submissions, Council has sought advice from Meridian Urban together with Water Technology, on the response to matters raised in relation to flooding in the submissions. Technical assistance was required as follows:

- **Recommendations on draft responses to submissions** covering the range of submitter issues which include but not limited to:
 - local flood studies and in particular the identification of 'flood risk' where previous instruments have only identified an overland flow path existed, resulting in a changed perception of 'flooding'. A major locality issue is identified but may also be applicable in similar circumstances outside of the riverine and creek models currently;
 - Limited development zoning and the 'need' to change from Residential zoning with an overlay, to Limited development zone and additional overlays;
 - changing the zoning as an appropriate response to managing risk e.g., link to Feasible Alternatives Assessment Report (FAAR) relevant matters;
 - addressing a potential 'building matters' gap – review and provide clarity that the chain of referrals and operation with the building code matters are sufficient and provide advice notes or otherwise to ensure clarity to end users. May need advice on additional notes or required outcomes changes;
 - consideration of non-scheme matters including:
 - implications noted on insurance, property values, resale and ability to undertake renovations (material change of use (MCU) versus building work);
 - 'compensations' for perceived loss of value e.g., differential rating and recommendations and loss of value for future compensation claims; and
 - social justice matters.
- **Recommendations forming a 'roadmap' of planning scheme amendments** to address submitter issues raised including any relevant:
 - statutory and procedural matters arising from compliance with the Ministers Guidelines and Rules (MGR) or resulting from changes to the FAAR; and

- o notes the availability of explanatory notes, relevant material and guidance to enable the implementation of the requirements of the planning scheme for flood risk.
- **Technical review and assessment of the mapped flood risk categories** and any accompanying technical statement against that allocation of risk to ensure consistency in planning policy as outlined in the Ipswich Integrated Catchment Plan – Strategic and Action Plan, 2021 (IICP).

1.2 Report

The purpose of this report is to:

- Provide the responses to the matters raised in relation to flooding in the submissions on the draft Ipswich Plan;
- Identify proposed changes or actions required in response to the matters raised relating to flooding, including determining whether the proposed change or action would result in significantly different local planning instrument; and
- Provide a road map for undertaking the proposed changes or actions.

1.3 Summary of public consultation

The state government sets statutory requirements for the preparation of a planning scheme including its public consultation process through the *Planning Act 2016*, MGR and an approved Chief Executive Notice (including a mandatory communications strategy). Council identified two main desired outcomes for engagement on the draft Ipswich Plan, which were addressed in two phases.

1. **Phase 1: Raise awareness and educate the Ipswich community** on what a planning scheme is, the importance of having a draft new planning scheme, how the new planning scheme may impact their property or lifestyle and how to make meaningful contributions during the formal public consultation phase.
2. **Phase 2: Consult the Ipswich community on the draft new planning scheme** to identify concerns, opportunities and gather feedback on the draft new planning scheme, both informally and as formal 'properly made' submissions.

Phase 1 began in December 2022 with the launch of the 'New Ipswich Planning Scheme' website on Shape Your Ipswich. This provided accessible, user-friendly content on key planning topics and the draft new planning scheme. More than 50 unique education materials were developed for both current and future use, including fact sheets, videos and infographics.

Phase 2 covered the public consultation period for the draft scheme. Consultation ran for approximately 8 weeks, from 15 May 2023 to 16 July 2023. As part of Phase 2, 190 enquiries were received during public consultation, with 25% of the enquires related to the planning scheme theme of 'Resilient communities.' These enquiries primarily related to the updated Flood Risk and Overland Flow and Bushfire Risk Overlays.

This theme was also directly addressed through the focused community sessions held in Karalee, Rosewood and Goodna, which provided information specific to the updated hazard overlays and their potential impact. Some enquiries more specifically raised the Limited development zone and QRA Buyback Scheme. For example:

- Contests that a property did not flood in past flooding events including 2011 (that no water came onto the property); and
- Raised concerns with the application of the Limited Development Zone to land in Goodna and its effect on existing use rights, ability to rebuild an existing dwelling and reduction in market value.

2 Key issues raised in submissions and recommended response

2.1 Summary of submissions

Of the 502 submissions received, 43 submissions raised matters related to flooding and overland flow. Each submission has been reviewed, and the matters raised identified as key themes.

Of the submissions that raised matters related to flooding and overland flow, the majority of them raised concerns with the accuracy of the flood risk and overland flow mapping shown over particular properties (see **Figure 2-1** and **Table 2-1**). This was followed by a concern related to the change in zoning to the Limited development zone for some properties. Related to the proposed changes in mapping and rezoning of land, concerns were expressed with the loss of property value and increase in insurance premiums as a result of the change.

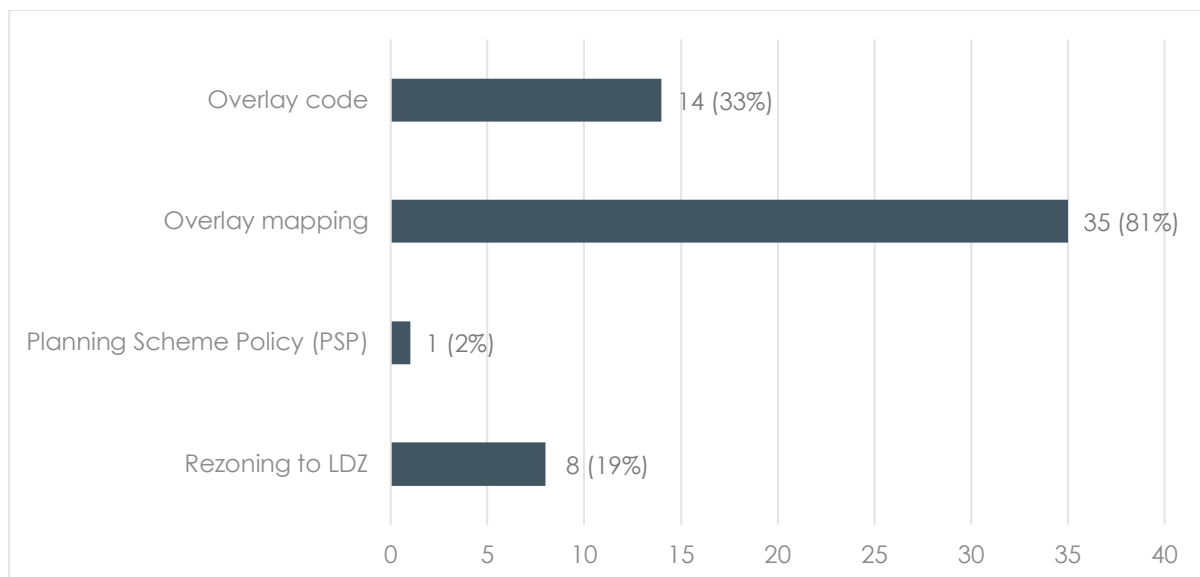


Figure 2-1: Number of submissions by comments on the draft Ipswich Plan (% is by total number of submission)

Table 2-1: Summary of top 10 themes raised in submissions related to flooding and overland flow

Top 10	Themes	No. (n)	Perc. (%)
1	Concern with the accuracy of the Flood risk and overland flow mapping	32	74%
2	Concern for loss of property value as a result of the identification of the property in the flood risk and overland flow overlay mapping or rezoning of the land	21	49%
3	Concern for the increase in insurance premiums as a result of the identification of the property in the flood risk and overland flow overlay mapping	15	35%
4	Concern with regulating development in the Low flood risk categories	9	21%

5	Comments on a specific code provisions	7	16%
6	Concern that development approvals and site works to mitigate flood risk have not been considered in the flood mapping data	7	16%
7	Concern with strict and inflexible requirements, limiting opportunity for future improvements to a dwelling	7	16%
8	Social injustice as a result of the identification of the property in the flood risk and overland flow overlay mapping or rezoning of the land	6	14%
9	Plain English information needs to be provided to the community on what the terminology means	6	14%
10	It is ambiguous and there is not enough information for residents to fully comprehend all the impacts of the change	6	14%

The next section of the report provides an overview of the themes raised in the submissions, across the following key areas of the draft Ipswich Plan:

- Flood risk and overland flow overlay code and planning scheme policy provisions (see **Section 2.2**);
- Flood risk and overland flow overlay mapping (see **Section 2.3**);
- Rezoning of properties to the Limited development zone (see **Section 2.4**);
- Feasible Alternatives Assessment Report (FAAR) (see **Section 2.5**);
- Other matters (see **Section 2.6**).

2.2 Summary of comments on the Flood risk and overland flow overlay code and planning scheme policy

Several submissions made comments seek clarification of policy matters in the Flood risk and overland flow overlay code and/or associated planning scheme policy provisions.

The top 10 themes to emerge from a review of the comments on the Flood risk overland flow overlay code and planning scheme policy provisions are provided in **Table 2-2**.

Table 2-2: Summary of top 10 themes raised in submissions related to the Flood risk and overland flow overlay code and planning scheme policy

Top 8	Themes	No. (n)	Perc. (%)
1	Comments on a specific code provisions	7	16%
2	Concern with strict and inflexible requirements, limiting opportunity for future improvements to a dwelling	7	16%
3	Confusion was expressed with the terminology and a request for clarity of definitions	4	9%
4	Concern with requirements related to the enclosure of areas below the flood planning level	2	5%

5	Concern with onerous requirements for sites subject to previous development approvals	2	5%
6	Expressed need to retain the opportunity to rebuild	2	5%
7	Request for a mechanism to be provided to correct mapping errors in draft Ipswich Plan	1	2%
8	Comments on specific planning scheme policy provisions	1	2%

A breakdown of the key themes raised in submissions related to comments on the Flood risk and overland flow overlay code and planning scheme policy provisions is provided below.

2.2.1 Clarification of policy matters

Clarification of policy matters in the Flood risk and overland flow overlay code

13 submissions made comments on the Flood and overland flow overlay code in the draft Ipswich Plan, including:

- Review the levels of assessment for certain types of development to ensure that they do not require a development approval unnecessarily, including:
 - change of uses which do not involve building work;
 - buildings works, involving an extension or renovation to a dwelling house, or where undertaken in accordance with an existing approval;
 - development located above the design flood level; and
 - on sites which have an existing approval which has involved operational work to ensure development occurs above the flood planning level.
- Clarification that the provisions related to the parts of the land included in the Medium to Extreme flood risk categories will not override the other provisions that relate to Very low to Low flood risk categories, and subsequently apply to the entire property;
- Clarification on what the flood planning level / defined flood level is for individual properties;
- Concerns the strict avoidance policy for development on land in the High and Extreme flood risk categories will unnecessarily limit subdivision of residential zoned land (refer to PO1.2);
- Clarification of the application of the flood storage and conveyance provisions, including:
 - request to remove item PO5.1(e) as this is a naturally occurring process and not practical for implementation;
 - providing the flexibility for minor earthworks (i.e., where ground levels are not greatly altered) to occur in the High to Extreme flood risk areas (refer to AO5.1.1);
 - further clarification of the application of development maintaining the flood storage capacity of the premises up to the defined flood level (refer to AO5.1.2);
 - whether a hydraulic impact assessment is required for all development within the floodplain up to the PMF (refer to AO5.1.2); and

- Alignment review and clarification of Priority evacuation area code provisions and broad Flood risk code provisions.

Proposed response

Council notes the clarifications and suggestions on proposed amendments to the draft Flood risk and overland flow overlay code. In response to these comments, Council intends to review the Flood risk and overland flow overlay code to ensure clarity of policy, and practicality with implementation, and undertake minor changes where required. In particular:

- Clarify that building work on lands with approved finished lot levels above the flood planning level (where in accordance with those approved lot levels), is not triggered for assessment by the draft overlay, in the same vein as operational work;
- Ensure that reference is made to 'hazard vulnerable uses' rather than just 'vulnerable use' throughout the code;
- Review the provisions related to reconfiguring a lot to ensure that all lots are designed to accommodate the development envisaged by the intended use, and that the intensification of land through the creation of additional lots is avoided in the high to extreme flood risk categories; and
- Clarify the application of the flood storage and conveyance provisions, including the requirement for a Hydraulic Impact Assessment where filling or excavation is proposed in the floodplain.

Recommended actions

- Review the Flood risk and overland flow overlay code to ensure clarity of policy, and practicality with implementation, and undertake minor changes where required.
- Consider including current flood planning levels / defined flood level in the property report available from Council's online planning scheme mapping.

2.2.2 Comments on the Flood risk and overland flow planning scheme policy

Clarification of policy matters in the Flood and overland flow overlay code planning scheme policy

One (1) submission from the Urban Development Institute of Australia (UDIA) has sought clarification of several matters in the Flood risk and overland flow planning scheme policy, including:

- Review and clarification of the requirements related to the Site based (localised) overland flow report, to ensure consistency and practicality of requirements; and
- Policy alignment review between Flood storage and conveyance provisions in the Flood risk and overland flow overlay code and the earthworks in the floodplain provisions in the Flood risk and overland flow planning scheme policy to ensure consistency and remove duplication.

Proposed response

Council notes the clarifications and suggestions on proposed amendments to the draft Flood risk and overland flow planning scheme policy. In response to these comments, Council intends to review the Flood risk and overland flow planning scheme policy to ensure clarity

of policy, and alignment with the Flood risk and overland flow overlay code, and undertake minor changes where required.

With particular regard to the provisions related to earthworks in the floodplain in the Flood risk and overland flow planning scheme policy, Council considers that these provide sufficient clarity of where filling should not adversely impact on the characteristics of the floodway or floodplain storage, i.e., up to the defined flood level. Council also notes it is sufficiently clear that the requirement for no morphological impact resulting from flow characteristic changes relates to the impact from the compensatory earthworks that would be assessed as part of the Hydraulic Impact Assessment, rather than that related to a broader catchment scale.

For clarity, Council is considering amending clause (e) to state:

6.11.16(6)(e). *no morphological impact resulting from flow characteristic changes from the compensatory earthworks.*

In relation to the requirements for maximum overland flow velocity and depth specified by 6.11.8 (4)(b), Council notes the criteria includes maximum velocity (only) and depth (only) criteria, in addition to depth-velocity product criteria in accordance with QUDM referenced in 6.11.8 (4)(e). For clarity, Council is considering the addition of the depth-velocity product.

Recommended action

- Review the Flood risk and overland flow planning scheme policy to ensure alignment and clarity of policy intent and remove duplication with the Flood risk and overland flow overlay code.

Clarification of policy matters in the Flood and overland flow overlay code and associated planning scheme policy

One (1) submission requested the inclusion of a process to instigate the review and update in the overlay mapping, where inaccuracies are found.

Proposed response

Council intends to undertake a systematic, citywide review and update of all flood modelling information and will update the flood overlay based on revised input data including updates to topographic information.

Recommended action

- Undertake a systematic review of the data (including LiDAR updates) and update region-wide modelling and flood mapping over time.

2.3 Summary of comments on the Flood risk and overland flow overlay mapping

A number of the submissions raised concerns relating to the accuracy of the Flood risk and overland flow mapping. The following **Table 2-3** provides an overview of the key themes raised in submissions related to the Flood risk and overland flow overlay mapping.

Table 2-3: Summary of issues for Flood overlay mapping

Top 6	Themes	No. (n)	Perc. (%)
1	Concern with the accuracy of the Flood risk and overland flow mapping	32	74%
3	Concern with regulating development in the Low flood risk categories	9	21%
4	Concern that development approvals and site works to mitigate flood risk have not been considered in the flood mapping data	7	16%
5	The mapped flood risk areas should be defined	4	9%
6	Concern with the inclusion of the PMF extent	2	5%
7	Concern with the accuracy of the Priority evacuation area mapping	2	5%

A breakdown of the key themes raised in submissions related to the accuracy of the Flood risk and overland flow mapping is provided below.

Concerns with the accuracy of the Flood risk mapping and flood studies

31 submissions raised concerns with the accuracy of the Flood risk mapping including comments:

- That the specific property has never been subject to flooding, and question the accuracy of the data used.
- Raising concerns that existing approvals and consequential flood mitigation improvements have not been recognised in the Flood risk mapping; and
- Seeking clarifications of the flood studies and flood information, such as through ground truthing.

Proposed response

Council is required to address flood risk within its draft planning scheme in accordance with the Natural hazards, risk and resilience state interest policies pursuant to the State Planning Policy (SPP). The SPP sets out the requirements for Councils to address flood risk through their planning schemes, including via flood risk mapping, zoning, and development controls.

Council used flood data based on modelled outputs and flood studies based on the best available information at the time of the study. The base topography of the models was based on most recent available LiDAR datasets which was captured in 2014 (BMTWBM 2019) and does not represent any filling or major earthwork activity after this date. As with all flood models significant effort has been invested in model calibration and sensitivity testing as far as practicable with the study scope to minimise uncertainty, however unquantified uncertainty remains. The study output remains fit for purpose, that is, as a trigger for development to further understand the risk and exposure of a site to overland flow.

Council intends to undertake a systematic, citywide review and update of all flood modelling information and will update the flood overlay based on revised input data including updates to topographic information.

Recommended action

- Undertake a systematic review of the data (including LiDAR updates) and update region-wide modelling and flood mapping over time.
- Undertake possible revisions to mapping for specific sites based on updated information since the release of the draft Ipswich Plan.

Concerns with the accuracy of the Overland flow mapping

Approximately seven (7) submissions raised concerns with the accuracy of the overland flow mapping across the specified property, noting changed ground conditions, site modifications and installation of drainage structures over time.

Proposed response

The overland flow path category represents the extent of the 2% AEP event based on Council's citywide Overland Flow Study undertaken in 2022. The base topography of the models was based on most recent available LiDAR datasets which was captured in 2014 (BMTWBM 2019) and does not represent any filling or major earthwork activity after this date. As with all flood models significant effort has been invested in model calibration and sensitivity testing as far as practicable with the study scope to minimise uncertainty, however unquantified uncertainty remains. The study output remains fit for purpose, that is, as a trigger for development to further understand the risk and exposure of a site to overland flow.

The risk allocation attributed to the overland flow study is to be reviewed by Council to reflect the citywide risk assessment in the Ipswich Integrated Catchment Plan.

Council intends to undertake a systematic, citywide review and update of all flood modelling information and will update the flood overlay based on revised input data including updates to topographic information in the future.

Recommended actions

- As part of a future citywide review and update:
 - investigate options for updating the flood risk and overland flow mapping to ensure the mapping reflects the different sources of flooding; and
 - undertake an alignment policy review of the Flood risk and overland flow overlay code and associated planning scheme policy to ensure it reflects any policy and mapping updates as required.

Concerns with the identification of properties in the Very low to Low flood risk categories

Approximately 10 submissions raised concerns about properties being included in the Very low and Low flood risk categories, noting the specific property has not experienced flooding since purchase and raising concerns with regards to limitations for future improvements to a dwelling, and data not recognising property modifications and changes in site levels.

Proposed response

Council is required to address flood risk within its draft planning scheme in accordance with the Natural hazards, risk and resilience state interest policies pursuant to the SPP. The SPP sets

out the requirements for Councils to address flood risk through their planning schemes, including via flood risk mapping, zoning, and development controls.

The Very low risk category is based on the Probable Maximum Flood (PMF) with a likelihood recurrence of 0.00001% in any given year OR 1 in 100,000 (BMTWBM, 2017). A PMF is the largest flood that could conceivably occur at a particular location, usually estimated from probable maximum precipitation with the worst flood-producing catchment conditions. The PMF defines the extent of flood-prone land – the floodplain. In accordance with best practice national flood risk management practice, it is important to consider a range of events including events of a magnitude not previously seen to understand a broad spectrum of risk across the floodplain. The Low risk category includes floods up to the 1 in 2,000 year flood event.

Being mapped in the Very low risk category has no impact on earthworks and residential uses as the assessment benchmarks in the draft Flood risk and overland flow overlay code are not triggered for residential uses. The core purpose of the Very low risk category is to trigger the application of the building assessment provisions for flooding as part of an application for a building approval (or building permit), and to manage flood risk associated with vulnerable uses like hospitals. The flood planning levels specified by Table 8.2.10.3.4 — Minimum food immunity standards are not triggered for residential development within the Very low risk category. Residential uses are also permitted on land within the Low risk category where they comply with the requirements for the Flood risk and overland flow overlay code which relate to building design including minimum floor level requirements.

Recommended actions

- Investigate minor formatting changes to the Very low (PMF) and low flood risk categories on the Flood risk and overland flow overlay map.
- Review the rain-on-grid models and associated flood overlay mapping to refine the mapping in accordance with latest mapping approaches (i.e., filter out the noise).
- Investigate refinements to Table 1.5.1 – Building assessment provisions to ensure appropriate triggering of the building assessment provisions (particularly application of MP3.5), including:
 - designation of a natural hazard management area (flood) refers to the Flood risk and overland flow overlay map (and particularly the key risk categorisations of interest within it) (not the code);
 - declaration of the maximum flow velocity of water needs to be linked to the Flood information reports of Council.

Concerns with the accuracy of the Priority evacuation areas mapping

Three (3) submissions raised concerns with the extent of the Priority evacuation areas and a potential misalignment between the technical supporting report and the final polygon shapes. The submissions further questioned:

- The necessity of the Priority evacuation area where direct road frontage above flood risk is provided; and
- Why over 2360 properties within the Feasible Alternatives Assessment Report (FAAR) which are nominated as Residential Density Reduction Candidates, solely

on the basis of being contained within an Priority evacuation area, noting that this is incorrect based on the inaccurate mapping.

Proposed response

Priority evacuation areas are nominated groups of properties that are subjected to an accumulation of flood risk factors including long duration of inundation, high hydraulic risk categories and short time to inundation (meaning short to no flood warning time in localised flood events). The properties identified in the submissions as being in a Priority evacuation area are mapped as affected by flooding from the Brisbane River, Bremer River or Bundamba Creek.

The Priority evacuation areas were developed as part of the Ipswich Integrated Catchment Plan, released in 2021, which is part of Council's ongoing commitment to understanding and preparing for floods. These areas have been identified based on best available information at the time of the study.

It is noted that an Evacuation Capability Assessment was undertaken for only the high Priority evacuation areas as part of the Technical Evidence Report (Water Technology, 2020) for the IICP. The Evacuation Capability Assessment in the study included the development of a methodology to prioritise high risk areas based on exposure to the multiple layers of flood risk data. Using a GIS approach to map across the Ipswich local government area (LGA), critical infrastructure, evacuation route, flood warning and isolation risk data were included in the methodology. The methodology focused on prioritising the most at-risk properties and communities. An evacuation capability assessment looks at the priority 'clusters' of the most at-risk properties based on similar geographic characteristics that may share evacuation routes to higher ground.

Recommended actions

- Adjust the Priority evacuation area boundary for submissions that raised concerns with the accuracy of the Priority evacuation areas mapped extent.
- Review the Priority evacuation areas mapping and consider whether to include all Priority evacuation areas in the Flood risk and overland flow overlay map, or just those with noted evacuation limitations in the IICP TER. Consideration should also be given to any consequential changes where properties were identified for a density change (i.e., rezoning to arrest any further intensification of development on the site) as a result of the inclusion of the properties in a Priority evacuation area.
- Clarify how or whether the Residential density reduction candidate sites referred to within the FAAR received a reduced development limitation, such as via a zoning change or density reduction within the draft Ipswich Plan.
- Undertake evacuation capability assessments for all Priority evacuation area clusters to inform the review and update of the associated Priority evacuation area mapping in the Ipswich Plan, having regard to property boundaries and blocks of properties over time.

Comments in relation to the recognition of climate change

Three (3) submissions raised concerns in relation to the applied rainfall intensity indexing used for the listed flood models in response to climate change, noting that RCP8.5 (2100) is viewed by international and national communities as a probable "worst case scenario" and unlikely.

Proposed response

In relation to the inclusion of climate change considerations within the Defined flood event and level, Council notes that there is no specific guidance or policy set by the State government in relation to the Representative Concentration Pathway (RCP) benchmark that should be adopted for flood studies used for land use planning purposes.

As noted in clause 6.11.5 of the Flood risk and overland flow planning scheme policy, the methodology adopted for climate change for the Technical Evidence Report – Ipswich Integrated Catchment Plan (Water Technology, 2020) is in accordance with the Inland Flooding Study report (DNRM, 2010). This correlates with Australian Rainfall and Runoff (AR&R) 1987 methodologies which infers for every degree of global warming apply a 5% increase in rainfall intensity within the models. This is also considered to align with the Intergovernmental Panel on Climate Change's 'Representative Concentration Pathway' (RCP) 8.5 which assumes a sea level rise of 0.8 meters and a 20% increase in rainfall intensity for the year 2090. The adoption of RCP8.5 is therefore in line with adopted Representative Concentration Pathways reported by the Intergovernmental Panel on Climate Change. Consideration of RCP8.5 as a basis of future climate conditions is a conservative (yet possible) planning position and also ensures that there is no reduction in existing flood immunity across the LGA.

Recommended action

No proposed actions.

2.3.1 Comments on the flood risk and overland flow overlay mapping by specific areas

A number of the submissions raised concerns relating to the accuracy of the flood risk and overland flow mapping across particular areas, including:

- Camira;
- Newtown;
- Rosewood;
- Woodend; and
- Goodna.

A total of 25 were place specific as shown in **Figure 2-2**.

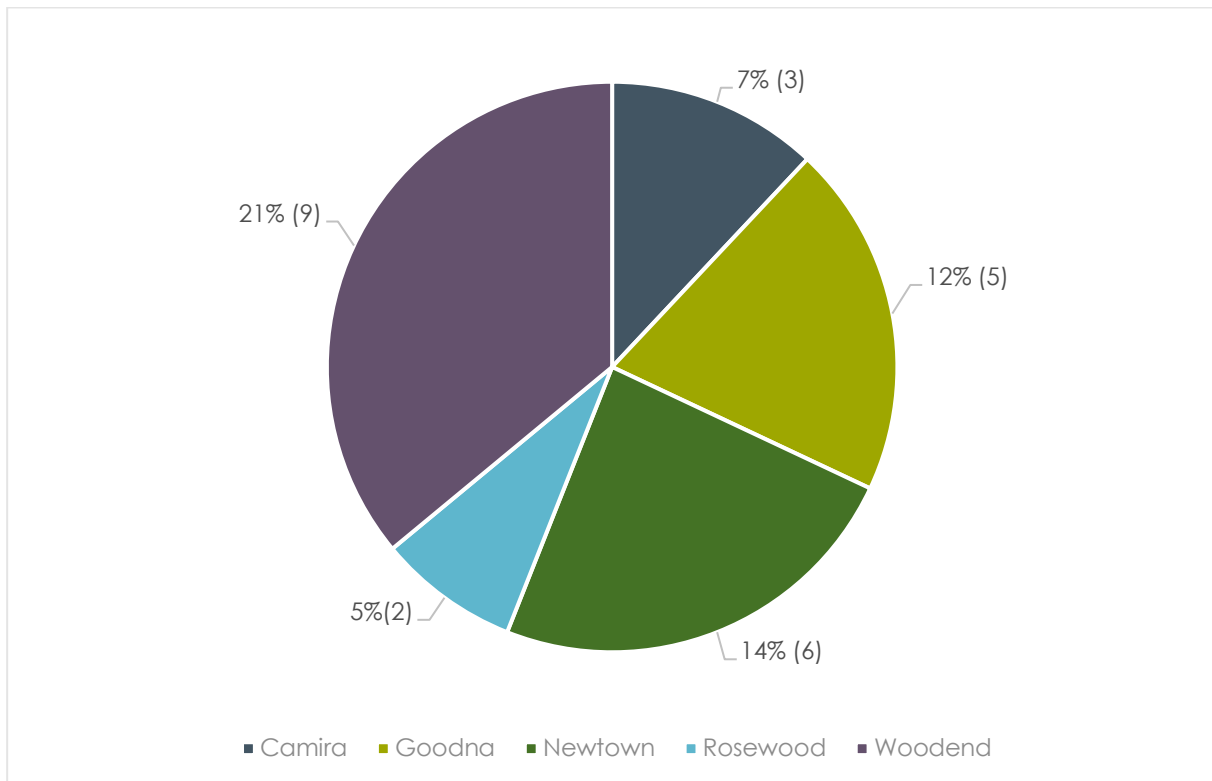


Figure 2-2: Submissions by locality (if relevant)

The following tables provide an overview of the key themes raised in submissions related to the specific places. Please note that comments in relation to Goodna are included in Section 2.4 of this report, as comments relate to a concern for the identification of these properties in the Limited development zone.

With regards to the three (3) submissions received in relation to properties located in Camira, concerns related to the identification of properties in a flood risk category, including concerns with the accuracy of the flood risk mapping. **Table 2-4** shows the top 10 themes raised in these submissions.

Table 2-4: Top 10 themes raised in submissions related to flooding and overland flow - Camira

Top 10	Themes	No. (n)	Perc. (%)
1	Concern for loss of property value as a result of the identification of the property in the flood risk and overland flow overlay mapping	3	100%
2	Concern with the accuracy of the Flood risk and overland flow mapping	2	67%
3	Concern with regulating development in the Low flood risk categories	2	67%
4	Concern for the increase in insurance premiums as a result of the identification of the property in the flood risk and overland flow overlay mapping	2	67%
5	Comments on a specific code provisions	1	33%

6	The mapped flood risk areas should be defined	1	33%
7	Plain English information needs to be provided to the community on what the terminology means	1	33%
8	Mental stress was expressed as a result of the proposed changes	1	33%
9	Concerns with requirements related to the enclosure of areas below the flood planning level	1	33%
10	Confusion was expressed with the terminology and a request for clarity of definitions	1	33%

A breakdown of the key themes raised in submissions related to Camira is provided below.

Concerns with the accuracy of the flood risk overlay mapping in Camira

Three (3) submissions were received which raised concerns in relation to the accuracy of the flood risk and overland flow overlay mapping across properties in Camira.

Proposed response

Council is required to address flood risk within its draft planning scheme in accordance with the Natural hazards, risk and resilience state interest policies pursuant to the SPP. The SPP sets out the requirements for councils to address flood risk through their planning schemes, including via flood risk mapping, zoning, and development controls.

The properties identified area included within the Very low, Low, Medium, High and/or Extreme flood risk categories. This is representative of a wide range of flooding events and magnitudes, from frequent and hazardous to very rare. In accordance with best practice national flood risk management practice, it is important to consider a range of events including events of magnitude not previously seen to understand a broad spectrum of risk across the floodplain.

The flood data is either based on the Woogaroo Creek Flood Study Update undertaken in 2019 which replaced the previous flood study undertaken in 2017 or the Brisbane River Catchment Flood Study undertaken in 2019 by Queensland State Government, which represent the best available information at the time of the study.

Council intends to undertake a systematic review and update of all flood modelling information, citywide and will update the flood overlay based on revised input data including updates to topographic information.

Recommended action

- Undertake a systematic review of the data (including LiDAR updates) and update region-wide modelling and flood mapping over time.
- Review the rain-on-grid models and associated flood overlay mapping to refine the mapping in accordance with latest mapping approaches (i.e., filter out the noise).
- Review and update the flood risk overlay mapping for HR2(a) from medium risk to low risk.

With regards to the six (6) submissions received in relation to the properties located in Newtown, concerns primarily related to the identification of flood risk across properties where the previous planning scheme has only identified an overland flow path existed. **Table 2-5** shows the top eight (8) themes raised in these submissions.

Table 2-5: Top 8 themes raised in submissions related to flooding and overland flow - Newtown

Top 8	Themes	No. (n)	Perc. (%)
1	Concern with the accuracy of the Flood risk and overland flow mapping	6	100%
2	Concern for loss of property value as a result of the identification of the property in the flood risk and overland flow overlay mapping	3	50%
3	Concern for the increase in insurance premiums as a result of the identification of the property in the flood risk and overland flow overlay mapping	3	50%
4	Lack of consultation with property owners	2	33%
5	Social injustice as a result of the identification of the property in the flood risk and overland flow overlay mapping or rezoning of the land	1	17%
6	Alternate mitigation needs to be considered as opposed to rezoning of the land	1	17%
7	Concern with regulating development in the Low flood risk categories	1	17%
8	The mapped flood risk areas should be defined	1	17%

A breakdown of the key themes raised in submissions related to Newtown is provided below.

Concerns with the accuracy of the flood risk overlay mapping in Newtown

Six (6) submissions were received which raised concerns in relation to the accuracy of the flood risk overlay mapping across properties located in Newtown. In particular, concerns were raised about the identification of flood risk across the properties where previous instruments have only identified an overland flow path existed, resulting in a changed perception of 'flooding'. A major locality issue is identified but may also be applicable in similar circumstances outside of the riverine and creek models currently.

Proposed response

Council is required to address flood risk within its draft planning scheme in accordance with the Natural hazards, risk and resilience state interest policies pursuant to the SPP. The SPP sets out the requirements for councils to address flood risk through their planning schemes, including via flood risk mapping, zoning, and development controls.

Properties were identified within the Very low, Low and/or Medium flood risk categories of the draft Flood risk and overland flow overlay mapping, and sometimes also partially within the Overland flow path category. The flood data used to inform the development of the Flood risk overlay mapping was based on the Newtown and East Ipswich (Kendall St) Flood Study undertaken in 2015 and represents the best available information at the time. The

pixelated nature of the flood mapping represents the conveyance of floodwaters on the wider floodplain and represents flow paths that form during extreme rainfall events.

Council also intends to undertake a systematic, citywide review and update of all flood modelling information and will update the flood overlay based on revised data in due course. Further, the risk allocation is to be reviewed by Council to reflect the citywide risk assessment in the Ipswich Integrated Catchment Plan.

Recommended actions

- As part of a future citywide review and update:
 - investigate options for updating the flood risk and overland flow mapping to ensure the mapping reflects the different sources of flooding; and
 - undertake an alignment policy review of the Flood risk and overland flow overlay code and associated planning scheme policy to ensure it reflects any policy and mapping updates as required.
- Review and update the flood risk overlay mapping for HR2(a) from medium risk to low risk.

With regards to the two (2) submissions received in relation to the properties located in Rosewood, concerns primarily related to the accuracy of the flood risk and overland flow overlay mapping across properties in Rosewood. **Table 2-6** shows the four (4) themes raised in these submissions.

Table 2-6: Top 4 themes raised in submissions related to flooding and overland flow - Rosewood

Top 4	Themes	No. (n)	Perc. (%)
1	Concern with the accuracy of the Flood risk and overland flow mapping	2	100%
2	Concern with strict and inflexible requirements, limiting opportunity for future improvements to a dwelling	2	100%
3	Comments on a specific code provisions	2	100%
4	Existing development approvals and site works to mitigate flood have not been considered in the flood risk and overland flow mapping	2	100%

A breakdown of the key themes raised in submissions related to Rosewood is provided below.

Concerns with the accuracy of the flood risk overlay mapping in Rosewood

Two (2) submissions were received which raised concerns in relation to the accuracy of the flood risk and overland flow overlay mapping across properties in Rosewood, noting:

- That the flood risk categories are different to what has been experienced in major flood events previously in Rosewood; and
- Concerns that modifications as part of development approvals have not been recognised.

Proposed response

Council is required to address flood risk within its draft planning scheme in accordance with the Natural hazards, risk and resilience state interest policies pursuant to the SPP. The SPP sets out the requirements for councils to address flood risk through their planning schemes, including via flood risk mapping, zoning, and development controls.

The flood data is based on the Rosewood-Thagoona Flood Study Update undertaken in 2019 as part of the Ipswich Rivers Flood Studies Update replacing modelled output from previous flood studies undertaken in the early 2000's and represents the best available information at the time.

The base topography of the models was based on most recent available LiDAR datasets which was captured in 2009 (BMTWBM Rosewood, 2019) and does not represent any filling or major earthwork activity after this date. Council intends to undertake a systematic review and update of all flood modelling information, citywide and will update the flood overlay based on revised input data including updates to topographic information.

Overland flow mapping represents the extent of the 2% AEP event based on Council's Citywide Overland Flow Study undertaken in 2022. Again, the base topography of the models was based on most recent available LiDAR datasets which was captured in 2009 and does not represent any filling or major earthwork activity after this date.

The risk allocation is to be reviewed by Council to reflect the citywide risk assessment in the Ipswich Integrated Catchment Plan.

Recommended actions

- Review and update the flood risk overlay mapping for HR2(a) from medium risk to low risk.
- Undertake a systematic review of the data (including LiDAR updates) and update region-wide modelling and flood mapping over time.

With regards to the nine (9) submissions received in relation to the properties located in Woodend, concerns primarily related to the accuracy of the flood risk overlay mapping, with submissions noting that flooding has not been experienced across many of these properties previously. **Table 2-7** shows the seven (7) themes raised in these submissions.

Table 2-7: Top 7 themes raised in submissions related to flooding and overland flow - Woodend

Top 7	Themes	No. (n)	Perc. (%)
1	Concern with the accuracy of the Flood risk and overland flow mapping	8	89%
2	Concern for loss of property value as a result of the identification of the property in the flood risk and overland flow overlay mapping	5	56%
3	Concern for the increase in insurance premiums as a result of the identification of the property in the flood risk and overland flow overlay mapping	4	44%
4	Concern with regulating development in the Low flood risk categories	2	22%
5	Lack of consultation with property owners	1	11%

6	Social injustice as a result of the identification of the property in the flood risk and overland flow overlay mapping or rezoning of the land	1	11%
7	Concern with the accuracy of the Priority evacuation area mapping	1	11%

A breakdown of the key themes raised in submissions related to Woodend is provided below.

Concerns with the accuracy of the flood risk overlay mapping in Woodend

Nine (9) submissions were received which raised concerns in relation to the accuracy of the flood risk overlay mapping across properties located in Woodend, with submissions noting that flooding has not been experienced across many of these properties previously.

Proposed response

Council is required to address flood risk within its draft planning scheme in accordance with the Natural hazards, risk and resilience state interest policies pursuant to the SPP. The SPP sets out the requirements for councils to address flood risk through their planning schemes, including via flood risk mapping, zoning, and development controls.

The properties are mapped within the Very low, Low, Medium, High and/or Extreme risk categories. This is representative of a wide range of flooding events and magnitudes, from frequent and hazardous to rare.

The Very low risk category represents the extent of the Probable Maximum Flood (PMF) with a likelihood recurrence of 0.00001% in any given year OR 1 in 100,000 (BMTWBM, 2017). A PMF is the largest flood that could conceivably occur at a particular location, usually estimated from probable maximum precipitation with the worst flood-producing catchment conditions. The PMF defines the extent of flood-prone land - the floodplain. In accordance with best practice national flood risk management practice, it is important to consider a range of events including events of a magnitude not previously seen to understand a broad spectrum of risk across the floodplain.

The flood data is based on the Ipswich Rivers Flood Studies Update which models the Bremer River catchment from Moogerah Dam to the Brisbane River confluence (BMTWBM, 2019). The Ipswich Rivers Flood Studies Update was undertaken in 2019 and replaced modelled output from previous flood studies undertaken in the early 2000's and represents the best available information at the time of the study.

Being mapped in the Very low risk category has no impact on residential uses as the assessment benchmarks in the draft Flood risk and overland flow overlay code are not triggered for residential uses. The core purpose of the Very low risk category is to trigger the application of the building assessment provisions for flooding as part of an application for a building approval (or building permit), and to manage flood risk associated with vulnerable uses like hospitals. The flood planning levels specified by Table 8.2.10.3.4 — Minimum flood immunity standards are not triggered for residential development within the Very low risk category. Residential uses are also permitted on land within the Low and Medium risk categories where they comply with the requirements for the Flood risk and overland flow overlay code.

To understand a property's individual flood planning level, please contact Council to extract the relevant level for the property.

Recommended action

- Investigate minor formatting changes to the Very low (PMF) and Low flood risk categories on the Flood risk and overland flow overlay map.

2.4 Summary of comments on the proposed rezoning of properties to the Limited development zone

Four (4) submissions raised concerns relating to the proposed rezoning of properties to the Limited development zone, specifically in relation to properties located in Goodna. **Table 2-8** shows the top 10 themes raised in these submissions.

Table 2-8: Top 10 themes raised in submissions related to flooding and overland flow, and rezoning - Goodna

Top 10	Themes	No. (n)	Perc. (%)
1	Concern for loss of property value as a result of the identification of the property in the flood risk and overland flow overlay mapping	4	80%
2	Concern with rezoning the property to the Limited development zone	4	80%
3	It is ambiguous and there is not enough information for residents to fully comprehend all the impacts of the change	4	80%
4	Social injustice as a result of the identification of the property in the flood risk and overland flow overlay mapping or rezoning of the land	3	60%
5	Plain English information needs to be provided to the community on what terminology means	3	60%
6	Concern with the accuracy of the food risk and overland flow mapping	2	40%
7	Concern for the increase in insurance premiums as a result of the identification of the property in the flood risk and overland flow overlay mapping	2	40%
8	Mental stress was expressed as a result of the proposed changes	2	40%
9	Alternate mitigation needs to be considered as opposed to rezoning of the land	2	40%
10	Rezoning does not help mitigate potential flooding nor ease any evacuations	2	40%

A breakdown of the key themes raised in submissions related to Goodna is provided below.

Concerns with the change from a Residential zone to a Limited development zone in Goodna

Four (4) submissions were received which raised concerns with the rezoning of properties to the Limited development zone in Goodna, particularly along Brisbane Terrace. Submissions raised the following comments:

- The current Residential zoning should be maintained;

- The proposed rezoning will not help mitigate potential flooding of residences; Management of flood water controls and dam releases has reduced the risk of flooding;
- Alternatives to rezoning should be considered including investment in personnel / residential flood evacuation plans so residents know what to do in a flood event;
- Provision of flood evacuation infrastructure, noting that evacuation paths were not planned for as part of the construction of the Ipswich motorway;
- Concerns with loss of use rights with dwelling houses, multiple dwellings, educational establishments, child care centres, and tourist centres not permitted.

Proposed response

Council is required to address flood risk within its draft planning scheme in accordance with the Natural hazards, risk and resilience state interest policies pursuant to the SPP. The SPP sets out the requirements for councils to address flood risk through their planning schemes, including via flood risk mapping, zoning, and development controls.

There are a range of planning policy responses that can be used including:

- avoiding areas impacted;
- minimising change in areas impacted;
- including requirements to make new development more resilient to flooding; or
- changing the planning expectations to avoid the risk of flooding.

The Limited development zone is based on a combination of isolation risk from flood events, long durations of flood inundation of greater than 36 hours in rare events and very short flood warning times. These flood risk and land use planning criteria used to allocate properties into the Limited development zone were based on the best available flood risk data, are consistent with the SPP state interest requirements for Natural hazards, risk and resilience, and have been applied to all properties across the LGA that exhibit these risk characteristics. The nature of flood risk identified for the properties that fit the criteria was defined by Council as intolerable, and therefore requiring the zoning change.

Each flood event can differ and that is why flood events with specific probabilities (likelihoods) and the consequences of those events are sourced from robust flood studies. These flood studies are calibrated to historical flood events prior to modelling of design flood events - the likes of which are used as the basis for the Ipswich flood risk overlay mapping. The flood data is based on the Brisbane River Catchment Flood Study undertaken in 2019 by Queensland State Government and represents the best available information at the time the of the study and the preparation of the Flood Overlay Code and flood overlay map. Flood risk is mapped due to the frequency and hazard of flooding that may impact the floodplain in the vicinity of the property (not whether it has flooded historically).

Flood warning time as detailed in the Bureau of Meteorology service level specification is approximately 12 hours for the Ipswich city gauge (040831) (BOM, 2022), which allows enough time to evacuate the residents in Brisbane Terrace to higher ground. There are two possible routes i) via Old Logan Road to the east of Brisbane Terrace and ii) via Church Street which heads under the Ipswich motorway. Once roads are untrafficable (i.e., greater than 300mm) residential properties in Brisbane Terrace become isolated with floodwaters inundating the area for greater than 36 hours.

Building work (which includes building, repairing, altering, underpinning, moving or demolishing a building) in the Limited development zone is permitted where it complies with the requirements of the Dwelling house code and the Flood risk and overland flow overlay

code. Development for a new Dwelling which will result in the intensification of development and people living in the area is unlikely to be supported.

However, the triggering process between Tables 5.7.1, 5.9.10 and Table 8.2.10.3.1 may create unintended confusion regarding the level of assessment for certain types of Building Work – particularly for what types of Building Work a development application is required.

Recommended action

- Investigate the manner in which certain building work is triggered (such as Minor building work versus building work) between the various tables of assessment in Part 5 of the draft Ipswich Plan and their interaction with Table 8.2.10.3.1 – Benchmarks for accepted development subject to requirements and update as required.

2.5 Comments on the Feasible Alternatives Assessment Report (FAAR)

A concern relating to whether the FAAR followed due process in accordance with the Minister's Guidelines and Rules was also raised. A breakdown of this issue is provided below.

Concerns that all feasible alternatives were not considered

One (1) submission received raising concerns that the Minister's Guidelines and Rules under the Planning Act has not been met, noting that all feasible alternatives have not been considered, including the consideration of alternative flood mitigation options and the impact of not making the proposed planning change.

Proposed response

The MGR provides the process for making a change to reduce a material risk of serious harm to persons or property from natural hazards. A Feasible Alternatives Assessment Report (FAAR) must be prepared in accordance with Part 2 of Chapter 2 of the MGR when a change is made to a local planning instrument to reduce a material risk of serious harm to persons or property on the premises from natural events or processes.

The FAAR must include, amongst other matters, details of the proposed planning change and the resultant intended outcomes under the planning scheme, as well as the feasible alternatives that do not involve making a planning change, including doing nothing.

The IICP was prepared following the regionally consistent approach established in the SFMP for catchments of the Bremer River, Brisbane River and the local creeks within the bounds of the Ipswich.

The IICP is a non-statutory integrated floodplain management document which assessed and characterised the nature of flood risk across the Ipswich LGA and considers a range of options and associated recommendations and actions for how to manage flood risk across the Ipswich LGA, including :

Ipswich integrated Catchment Plan	
1. Define and reduce the flood risk	Understand the risk
2. Achieve sustainable flood mitigation through physical intervention	Council lead mitigation
3. Plan for development outcomes that are risk-informed	Minimise flood risk through land use planning
4. Promote flood-resilient built form	Property specific actions
5. Enable our community to anticipate, respond and adapt to floods and flooding	Community awareness, preparedness and responsiveness
6. Deliver emergency response and recovery decisions that are intelligence based	Disaster management

These options are consistent with the full suite of mitigation options identified in the subsequently released Queensland Flood Risk Management Framework and were sourced from previous Council flood studies and floodplain management plans and include dams, detention basins, permanent and temporary levees, flood gates and backflow prevention devices, high flow bypass channels/diversions; and Natural Floodplain Mitigation (NFM) measures, such as revegetation and floodplain re-engagement. Furthermore, three regional options shortlisted for further investigation during the SFMP have been assessed against other floodplain mitigation options developed as part of the IICP.

The SFMP recommendations included in the IICP were:

1. SO3 Upper catchment dry flood mitigation dams
2. SO5 Ipswich CBD flood gate; and
3. SO7 Goodna CBD levee.

(Water Tech, 2020).

For the purposes of preparing a FAAR, these management tools broadly represent the 'alternatives' that may be considered feasible as part of the process required by the MGR for reducing the level of risk of serious harm to persons or property from flood hazard.

Whilst some tools involve different regulatory and operational responses, it is important to note that they are highly integrated and complementary of each other in terms of minimising risks, building community resilience, and decreasing the burden for emergency management.

The tools collectively form an integrated delivery system for risk management – they do not and cannot work in isolation of each other, nor can they independently manage the full range of flood risk the city is exposed to.

The land use planning recommendations from the IICP were considered and informed the preparation of the proposed planning scheme changes for the draft Ipswich Plan.

The FAAR also addressed the option of 'do nothing' – to accept the risk or transfer it noting that other mitigation measures exist outside the planning process.

| Recommended action | |
| No proposed action. | |

2.6 Comments on other matters

A number of the submissions raised concerns relating to the implications of the changes on property values and resale, increase in insurance premiums, social injustice and inadequate public consultation and engagement with property owners. The following **Table 2-9** provides an overview of the key themes raised in submissions related to these other matters.

Table 2-9: Top 7 themes raised in submissions related to other matters

Top 7	Themes	No. (n)	Perc. (%)
1	Concern for loss of property value as a result of the identification of the property in the flood risk and overland flow overlay mapping or rezoning of the land	21	49%
2	Concern for the increase in insurance premiums as a result of the identification of the property in the flood risk and overland flow overlay mapping	15	35%
3	Social injustice as a result of the identification of the property in the flood risk and overland flow overlay mapping or rezoning of the land	6	14%
4	Plain English information needs to be provided to the community on what the terminology means	6	14%
5	It is ambiguous and there is not enough information for residents to fully comprehend all the impacts of the change	6	14%
6	Mental stress was expressed as a result of the proposed changes	4	9%
7	Lack of consultation with property owners	4	9%

A breakdown of the key themes raised in submissions related to other matters is provided below.

Concerns with the implications on property values and resale, and the increase in insurance premiums as a result of the identification of the property in the flood risk and overland flow overlay mapping, or rezoning of the land

Related to the proposed changes in mapping and rezoning of land, concerns were expressed across submissions with the loss of property value and increase in insurance premiums as a result of the change. In particular, the following concerns were raised:

- The Flood risk and overland flow overlay mapping will complicate any financial dealings with the property as financial institutions will not be keen to finance a property that has these restrictions – the property will not be able to be sold openly on the market without restrictions on its use;
- The valuation of the property will be diminished and in comparison, with other areas that do not have these restrictions, would be in the vicinity of \$100-\$200,000.00 lost in value;
- Does the council envisage a compensation scheme to redress the lost property value created by the implementation of the planning changes;

- Insurance premiums will substantially increase and any renovations (if any allowed) will be required to incorporate water resilient materials which will also increase costs on property owners.

Proposed response

Property value is determined by the market. Changes in property value will occur based on many factors, including general market demand, sentiment, population growth, interest rates, site-specific characteristics and constraints, financiality metrics set by financial institutions, and development regulation. Council has a responsibility to both owners and prospective property purchasers of the known levels of flood risk on a property so that all parties can understand this risk and make informed decisions. This was a particular area of focus of the 2012 Queensland Floods Commission of Inquiry, including recommendations 2.16, 8.1, and 8.2.

Insurance companies have had access to the flood data on which the flood overlay is based prior to the release of the draft Ipswich Pan by Council such as the Brisbane River Flood Study Released by Queensland State Government in 2019. Prior to the completion of the Flood Study, insurance companies have historically made decisions about insurance premiums based on their own internal flood modelling data, the frequency of flooding and historic flood events.

Recommended action

No proposed action.

Concerns with social injustice as a result of the identification of the property in the Flood risk and overland flow overlay mapping or rezoning of the land

Four (4) submissions raised concerns with social injustice as a result of the identification of properties in the Flood risk and overland flow overlay mapping or rezoning. In particular, the following concerns were raised:

- Rezoning to Limited development zone would primarily favour more affluent areas while neglecting the needs of lower income Ipswich communities. It is crucial to ensure equitable access to housing opportunities for all residents, regardless of their economic status;
- The rezoning will impact those in lower-economic areas considerably given the limits to development, whilst helping minimise the impact of flooding on people and property in the District Centre. This can be seen as Council prioritising central Ipswich residents (who have more wealth, resources and live closer to the more well-off District Centre), as opposed to lower income families living downstream of the city centre;
- Potential consequences of rezoning land owned by the most vulnerable members of the community should be considered. Low-income families, who often struggle to find affordable housing options, would face increased difficulties in securing stable and accessible housing if the limited development zoning is enacted. This could result in displacement, reduced access to education and healthcare, and a deepening of existing social inequalities;
- Further detailed planning is required before any change in zoning can be undertaken. This will give the residents a plan for their homes, lives and an adequate timeframe to make alternative living/residential arrangements.

Proposed response

Council is required to address flood risk within its draft planning scheme in accordance with the Natural hazards, risk and resilience state interest policies pursuant to the SPP. The SPP sets out the requirements for councils to address flood risk through their planning schemes, including via flood risk mapping, zoning, and development controls.

In accordance with the SPP, planning must consider, in the context of flooding, whether the zone allocated can reflect the land use capacity of that land commensurate with the flood risk. In this way there is no misunderstanding about how the land can be used. The SPP states that (emphasis added):

“Overlays should be compatible with and not operate either individually or cumulatively to prevent or restrict land from being used for the purpose for which it has been zoned”.

There are a range of planning policy responses that can be used including:

- avoiding areas impacted;
- minimising change in areas impacted;
- including requirements to make new development more resilient to flooding; or
- changing the planning expectations to avoid the risk of flooding.

The Limited development zone is based on a combination of isolation risk from flood events, long durations of flood inundation of greater than 36 hours in rare events and very short flood warning times. These flood risk and land use planning criteria used to allocate properties into the Limited development zone were based on the best available flood risk data, are consistent with the SPP state interest requirements for Natural hazards, risk and resilience, and have been applied to all properties across the LGA that exhibit these risk characteristics. The nature of flood risk identified for the properties that fit the criteria was defined by Council as intolerable, and therefore requiring the zoning change.

Council to consider the connection and alignment between the IICP and possible future buy-back programs of state or local government and implications for the zoning of land noting that there is uncertainty related to future rollout of these programs.

Recommended action

No proposed action.

Concerns that inadequate consultation with affected property owners has been undertaken

Four (4) submissions raised concerns about inadequate consultation occurring with affected property owners for proposed flood related changes in the draft Ipswich Plans, especially in those areas substantially effected and suggested actions such as:

- notice through invitation to a community forum, or by letter should have been provided to affected residents; and
- library access, meetings and website space is not the same as discussing flood related changes with each affected property owner face to face to ensure affected property owners are fully informed.

Proposed response

The state government sets statutory requirements for the preparation of a planning scheme including its public consultation process through the *Planning Act 2016*, Ministers Guidelines and Rules and an approved Chief Executive Notice (including a mandatory communications strategy. With regards to public consultation of a proposed draft Ipswich

Plan, as a minimum, Council is required to place a public notice in a newspaper circulating in the LGA, as well as on the Council's website.

As part of the public consultation of the draft Ipswich Plan, Council undertook an extensive engagement process, which included the following two phases:

1. **Phase 1: Raise awareness and educate the Ipswich community** on what a planning scheme is, the importance of having a draft new planning scheme, how the new planning scheme may impact their property or lifestyle and how to make meaningful contributions during the formal public consultation phase.

Phase 1 began in December 2022 with the launch of the 'New Ipswich Planning Scheme' website on Shape Your Ipswich. This provided accessible, user-friendly content on key planning topics and the draft new planning scheme. More than 50 unique education materials were developed for both current and future use, including fact sheets, videos and infographics.

2. **Phase 2: Consult the Ipswich community on the draft new planning scheme** to identify concerns, opportunities and gather feedback on the draft new planning scheme, both informally and as formal 'properly made' submissions.

Phase 2 covered the statutory public consultation period for the draft Ipswich Plan and ran for approximately 8 weeks, from 15 May 2023 to 16 July 2023.

In accordance with statutory consultation requirements, more than 78,000 letters were sent to all ratepayers in the Ipswich LGA, and a copy placed on Council's website for the duration of the consultation period, which included the following information:

- The dates for public consultation;
- Explained how the draft new planning scheme, including a Feasible Alternative Assessment Report (FAAR), might affect residents and directed them to the Shape Your Ipswich project page;
- Outlined the different ways to make a submission (online, via email or via post);
- Provided a QR code leading to the draft Ipswich Plan to ensure residents could easily access the draft scheme; and
- FAQs to ensure all information provided to residents was clear and understandable.

Notice was also placed in several locally circulating newspapers and newsletter publications including *Ipswich in Winter*, *Ipswich 60 and Better*, *Ipswich Local News Magazine*, *Local Ipswich News*, *Ipswich News Today*, *Ipswich Tribune* and *Moreton Border News*.

To further support public consultation, Council prepared education materials which were made available on their website and provided in a printed format as part of consultation events, including:

- **Zone cards** – to help the community better understand the zones in the draft Ipswich Plan, including a zone card on the Limited development zone;
- **Fact sheets** – to explain the key differences between the draft Ipswich Plan and the current planning scheme, including a fact sheet on the updated mapping for the Flood risk and overland flow overlay, as well as a fact sheet on flood risk mapping;
- **Videos** – to communicate high-level information on key planning topics including a video on Flooding, resilience and planning in Ipswich, and a video on Resilient communities; and
- **Shape Your Ipswich project webpage** – which housed the range of education material for access by the community.

Various forms of communication were also utilised to encourage residents to have their say on the draft Ipswich Plan and to also raise awareness of the consultation activities, including:

- **Social media** – which included a series of Facebook advertisements;
- **E-alerts** – which were sent out to subscribers on the Shape Your Ipswich project page;
- **Ipswich First** – where included banners, prominent advertisement spaces and EDMs;
- **Internal marketing** – which included email signature banners used by Ipswich City Council staff;
- **Postcards and posters** – which were distributed across businesses;
- **Signage** – which included a print billboard located in Bremer Street, bus shelter panel displays, digital signage at local shopping centres and pull-up banners at Ipswich libraries;
- **Print media** – which included media releases; and
- **Radio** – which included Mayor Teresa promoting consultation of the draft Ipswich Plan during a weekly segment.

A range of engagement activities were also delivered during the Phase 2 public consultation period to provide opportunities for residents to speak directly with Council planners about the draft Ipswich Plan, educate and engage with residents on key changes, and to address specific areas, such as flooding, bushfire and biodiversity, including:

- Hosting a **public consultation launch event**;
- Dedicated **hotline, email enquiry address and enquiry desk**;
- Hosting a **pavilion stall at the Ipswich Show**;
- Undertaking three **live webinars** via Zoom;
- Hosting **talk to a planner sessions** in local libraries;
- **Attending the community sessions and meetings**, including attending the Stronger Communities Masterclass (facilitated by Volunteering Queensland) and three community meetings within the Karalee Residents Association, Marburg and Districts Residents Association and Pine Mountain Progress Association;
- Undertaking three **community information sessions in Goodna, Rosewood and Karalee**, which provided information specific to the updated hazard overlays and their potential impact;
- **Presenting at a UDIA industry breakfast**, which provided an Ipswich Planning Scheme Industry Update; and
- **Engaging with working groups**, including the Aboriginal and Torres Strait Islander Employee Working Group.

Recommended action

No proposed action.

3 Proposed changes in response to matters raised in the submissions

The following section of this report identifies the proposed changes and/or actions in response to the matters raised in submissions relating to flooding.

3.1 Policy considerations for proposed changes

3.1.1 Determining if a proposed local planning instrument is significantly different

Schedule 2 of the *Minister's Guidelines and Rules under the Planning Act 2016, Version 2.0* (MGR) provides that Council may make changes to the draft Ipswich Plan after the proposed local planning instrument has undertaken public consultation.

However, Council is required to consider whether the changes to the draft Ipswich Plan after public consultation, are significantly different.

In considering whether the proposed changes would result in a significantly different local planning instrument, the following matters must be given consideration in terms of:

- the change's intent, extent and effect on both the land use outcomes as well as assessment requirements on individuals; and
- if the change has affected or altered any of the following:
 - (a) a material planning issue, such as a policy position;
 - (b) a significant proportion of the area or landowners covered by the proposed planning instrument;
 - (c) a matter which is of public interest;
 - (d) levels of assessment;
 - (e) the proposed instrument or proposed amendment, so that it is quite different to the version which was released for public consultation; or
 - (f) any other matter the local government considers relevant.

Notwithstanding, the MGR provides that if the change to the Ipswich Plan includes new or amended natural hazard mapping, the proposed instrument is not significantly different if the local government advises each landowner who is affected by the new or amended natural hazard mapping about the meaning of the mapping and how to obtain further advice by—

- (a) **sending a letter to each affected property owner when the number of affected owners is relatively low (for example, in the hundreds or less); or**
- (b) sending a brochure to all property owners in the local government's area when the number of affected owners is high (for example, in the thousands or more).

3.1.2 Process for making a planning change to reduce a material risk of serious harm to persons or property from natural hazards

The MGR provides the process for making a change to reduce a material risk of serious harm to persons or property from natural hazards (see **Table 3-1**). A Feasible Alternatives Assessment Report (FAAR) must be prepared in accordance with Part 2 of Chapter 2 of the MGR when a change is made to a local planning instrument to reduce a material risk of serious harm to persons or property on the premises from natural events or processes.

Table 3-1: Process for making a planning change and preparation of a FAAR

Process for making a planning change to reduce a material risk of serious harm to persons or property from natural hazards	Completed
Preparation of a draft FAAR	✓
Copy of the draft FAAR and list of affected property owners given to the Minister	✓
Notice of the proposed planning change given to all affected property owners	✓
Consideration of properly made submissions about the proposed change and preparation of a consultation report	
Copy of the consultation report to be provided to each submitter and a copy made available to publicly	
Finalisation of the FAAR considering submissions on the proposed planning change	
Copy of the final FAAR and list of affected property owners given to the Minister	
Notice of the planning change given to every property owner who received notice as part of public consultation	

3.1.2.1 Notice of the proposed planning change

As part of the preparation of a FAAR, in accordance with the MGR, under section 18 of the Planning Act, Council is required to give the draft FAAR to the Minister together with details of every property affected by the planning change, with a notice requesting a state interest review.

For the draft Ipswich Plan, Council gave notice to the Minister together with a copy of the draft FAAR and details of every property affected by the planning change requesting a state interest review and approval to proceed to public consultation.

Chapter 4 of the MGR also requires that in addition to the notice requirements under the Planning Act for a new planning scheme, **notice is given to every property owner affected by the proposed planning change:**

- (a) **advising the property owner about the meaning of the proposed planning change;**
- (b) **advising that the proposed planning change is an aspect of the proposed planning scheme and the person may make a submission about the proposed planning change during public consultation;**
- (c) **be given at the same time or before the commencement of the public consultation on the proposed planning scheme; and**
- (d) **include—**
 - (i) **the public notice requirements listed in section 1(a) to (i) of Schedule 4 of the MGR; and**
 - (ii) information on how to obtain a copy of the draft FAAR.

As part of public consultation on the draft Ipswich Plan, more than 78,000 letters were sent to all ratepayers which included the following information:

- The dates for public consultation;
- Explained how the draft new planning scheme, including a Feasible Alternative Assessment Report (FAAR), might affect residents and directed them to the Shape Your Ipswich project page;
- Outlined the different ways to make a submission (online, via email or via post);
- Provided a QR code leading to the draft Ipswich Plan to ensure residents could easily access the draft scheme; and
- Included FAQs to ensure all information provided to residents was clear and understandable.

Notice was also placed in several locally circulating newspapers and newsletter publications including *Ipswich in Winter*, *Ipswich 60 and Better*, *Ipswich Local News Magazine*, *Local Ipswich News*, *Ipswich News Today*, *Ipswich Tribune* and *Moreton Border News*.

In addition, Council also made the FAAR available during the consultation period and accessible from Council's Shape Your Ipswich project webpage. To provide further additional support and information on the draft Ipswich Plan, including the proposed changes for flooding and overland flow, and to encourage residents to get involved, Council made available:

- **Zone cards** – to help the community better understand the zones in the draft Ipswich Plan, including a zone card on the Limited development zone;
- **Fact sheets** – to explain the key differences between the Draft Ipswich Plan and the current planning scheme, including a fact sheet on the updated mapping for the Flood risk and overland flow overlay, as well a fact sheet on flood risk mapping;
- **Videos** – to communicate high-level information on key planning topics including a video on Flooding, resilience and planning in Ipswich, and a video on Resilient communities; and

- **Advertisements** – which were sent out through social media; e-alerts; the placement of signage and banners in prominent places including billboards, bus shelters, shopping centres and libraries; internal marketing with the use of email signature banners; postcards and posters distributed to businesses, preparation of print media and radio segments.

A range of engagement activities were also delivered during the consultation period to provide opportunities for residents to speak directly with Council planners about the draft Ipswich Plan, educate and engage with residents on key changes, and to address specific matters, such as flooding and overland flow, including a dedicated hotline, email enquiry and enquiry desk; webinars, pop-up stalls and planner sessions across the city; and attending community and industry sessions.

With regards to engagement sessions specifically related to the flooding changes, Council undertook three community information sessions in Goodna, Rosewood and Karalee, which provided information specific to the updated hazard overlays and their potential impact and also attended three community meetings within the Karalee Residents Association, Marburg and Districts Residents Association and Pine Mountain Progress Association.

3.1.2.2 Next steps in the FAAR process

Preparation of a consultation report considering submissions about the proposed planning change

In accordance with Chapter 4 of the MGR, at the end of the public consultation period, Council must—

- (a) consider every properly made submission about the proposed planning change; and
- (b) include the consideration of every properly made submission about the proposed planning change in a consultation report.

Consultation report provided to submitters and made publicly available

A copy of the consultation report must be—

- (a) provided to each person who made a properly made submission about the proposed planning change; and
- (b) available to view and download on the local government's website; or
- (c) available to inspect and purchase in each of the local government's offices.

Finalisation of the FAAR and copy provided to Minister

After completing the consultation report Council must finalise the FAAR, considering any properly made submission from a property owner affected by the proposed planning change and any changed circumstances, including advances in technology and scientific knowledge that occur prior to the feasible alternatives report being finalised.

A copy of the final FAAR must be given the Minister as part of the process for adopting the new planning scheme, including—

- (a) details of the affected premises; and

- (b) any relevant supporting information, including sufficient information to demonstrate that the requirements of section 30(5) of the Act have been met.

Notice of the planning change to reduce a material risk of serious harm to persons or property from natural hazards

Council must also give notice to every property owner who received notice as part of the public consultation of the Ipswich Plan, following Council's decision to adopt or not proceed with the proposed planning scheme. The notice must include:

- (a) details of the planning change; and
- (b) a copy of the notice required under section 1 of Schedule 5.

Section 1 of Schedule 5 relates to the local government publishing a public notice about the decision of the local government to adopt or not proceed with an amendment to the planning scheme.

3.2 Recommendations road map

This section of the report identifies the key issues raised in the flood related submissions on the draft Ipswich Plan and the proposed actions for addressing the issues (see **Table 3-3**).

The following priority ranking and timing is identified for the proposed actions:

Table 3-2: Criteria used to rank recommendations

Priority for action ranking		Timeframe for action
★★★	High priority <ul style="list-style-type: none"> The issue is of a substantial scale that requires attention The issue is in response to regulatory requirements 	Short term <ul style="list-style-type: none"> Updates as part of the finalisation of the Ipswich Plan
★★	Medium priority <ul style="list-style-type: none"> The issue is complex The issue is of a scale that requires attention 	Medium term <ul style="list-style-type: none"> Changes actionable over the next 1 to 2 years Changes actionable as part of a future amendment to the Ipswich Plan
★	Minor priority <ul style="list-style-type: none"> The issue is minor in nature and does not relate to a policy change The issue relates to clarifying the intent of the advertised policy 	Long term <ul style="list-style-type: none"> Longer term systematic changes occur over time

The recommendations are grouped into the following pathway stages:

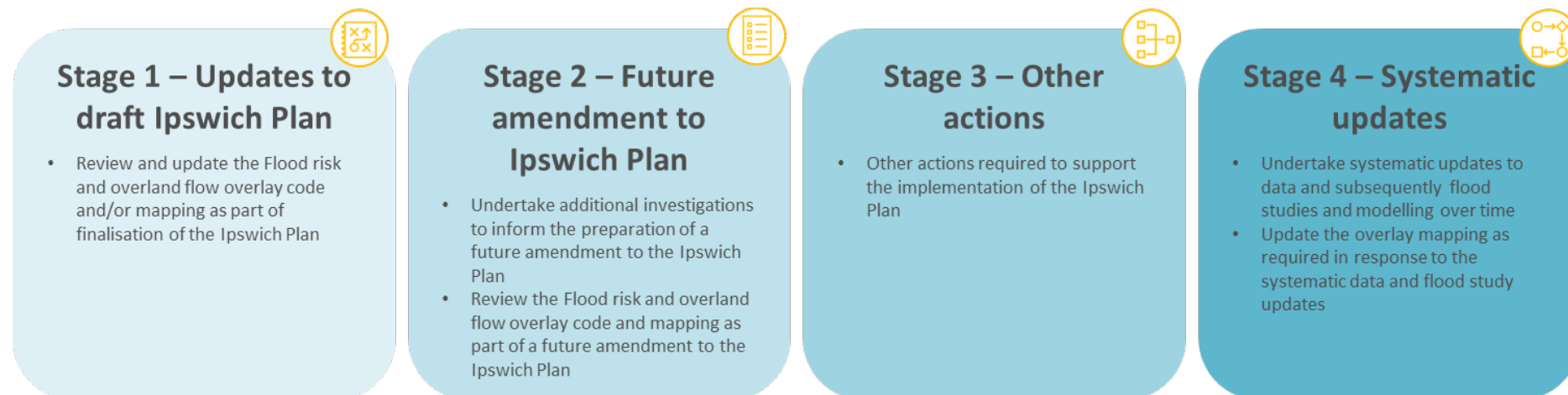


















Table 3-3: Recommendations for proposed actions for addressing key issues raised in flood related submissions to the draft Ipswich Plan





No.	Issue	Proposed actions	Stage	Significantly different test <i>(only applies to stage 1 updates)</i>	FAAR update required	Priority for action	Timing
1. Flood risk and overland flow overlay code							
1.1	Clarification of policy matters	Review the Flood risk and overland flow overlay code to ensure clarity of policy, and practicality with implementation, and undertake minor changes where required.	 Stage 1	The changes to clarify policy matters in the Flood risk and overland flow overlay code do not result in a significantly different change as they: <ul style="list-style-type: none"> only seek to clarify the advertised policy position and do not introduce a new policy position. 	✓	★	Short term <i>(6 to 12 months)</i>
1.2	Concerns with the identification of	Investigate refinements to Table 1.5.1 – Building assessment provisions to ensure		The changes clarify regulatory requirements related to building work		★★★	Short term


No.	Issue	Proposed actions	Stage	Significantly different test (only applies to stage 1 updates)	FAAR update required	Priority for action	Timing
	properties in the Very low and Low flood risk categories	appropriate triggering of the building assessment provisions (particularly application of MP3.5), including: <ul style="list-style-type: none"> Designation of a natural hazard management area (flood) refers to the Flood risk and overland flow overlay map (and particularly the key risk categorisations of interest within it) (not the code); Declaration of the maximum flow velocity of water needs to be linked to the Flood information reports of Council. 	Stage 1	regulated under the planning scheme do not introduce a new policy position.			(6 to 12 months)
1.3	Concerns with the change from a Residential zone to a Limited development zone	Investigate the manner in which certain building work is triggered (such as Minor building work versus building work) between the various tables of assessment in Part 5 of the draft Ipswich Plan and their interaction with Table 8.2.10.3.1 - Benchmarks for accepted development subject to requirements and update as required.	 Stage 1	The changes to clarify the triggering of building work across the draft Ipswich Plan do not result in a significantly different change as they: <ul style="list-style-type: none"> only seek to clarify the advertised policy position and do not introduce a new policy position. 		★	Short term (6 to 12 months)
1.4	Comments on the Flood risk and overland flow planning scheme policy	Review the Flood risk and overland flow planning scheme policy to ensure alignment and clarity of policy intent, and remove duplication with the Flood risk and overland flow overlay code.	 Stage 1	The changes to clarify policy matters in the Flood risk and overland flow planning scheme policy do not result in a significantly different change as they:		★	Short term (6 to 12 months)

No.	Issue	Proposed actions	Stage	Significantly different test (only applies to stage 1 updates)	FAAR update required	Priority for action	Timing
				<ul style="list-style-type: none"> only seek to clarify the advertised policy position and do not introduce a new policy position. 			
1.5	Concerns with the accuracy of the Overland flow mapping	As part of a future citywide review and update, undertake an alignment policy review of the Flood risk and overland flow overlay code and associated planning scheme policy to ensure it reflects any policy and mapping updates as required.	 Stage 2	Not applicable. Subject of a potential future amendment to the Ipswich Plan.		★★★	Medium term (1 to 2 years)
2. Flood and overland flow mapping							
2.1	Concern with identification of properties in Very low and Low flood risk categories	Investigate minor formatting changes to the Very low (PMF) and Low flood risk categories on the flood risk and overland flow overlay map.	 Stage 1	Change relates to a minor clarification update to the natural hazard mapping which does not result in a change to the mapping extent.	✓	★	Short term (6 to 12 months)
2.2	Concerns with the allocations of hydraulic hazard into specific flood risk categories	Review and update the flood risk overlay mapping for HR2(a) from medium risk to low risk.	 Stage 1	Change relates to updates to the natural hazard mapping to correct identified errors. In accordance with the MGR, changes to natural hazard mapping is not significantly different if Council gives notice to each landowner who is affected by the updated mapping about the meaning of the mapping and how to obtain further advice. This can be proposed as part of the process of giving a copy of the consultation report to each submitter.	✓	★★★	Short term (6 to 12 months)

No.	Issue	Proposed actions	Stage	Significantly different test (only applies to stage 1 updates)	FAAR update required	Priority for action	Timing
2.3	Clarification of flood risk versus overland flow mapping	As part of a future citywide review and update, investigate options for updating the flood risk and overland flow mapping to ensure the mapping reflects the different sources of flooding.	 Stage 2	Not applicable. Subject of a potential future amendment to the Ipswich Plan.		★★★	Medium term (1 to 2 years)
2.4	Concerns with the accuracy of the flood mapping	Review the rain-on-grid models and associated flood overlay mapping to refine the mapping in accordance with latest mapping approaches (i.e., filter out the noise).	 Stage 2	Not applicable. Subject of a potential future amendment to the Ipswich Plan.		★★★	Medium term (1 to 2 years)
2.5	Concerns with the accuracy of the flood overlay mapping not reflecting recent topography changes from development approvals	Undertake a systematic review of the data (including LiDAR updates) and update region-wide modelling and flood mapping over time.	 Stage 4	Not applicable. Subject of a potential future amendments to the Ipswich Plan over time.		★★	Long term (over time)
2.6		Undertake possible revisions to mapping for specific sites based on updated information since the release of the draft Ipswich Plan.	 Stage 1	Change relates to updates to the natural hazard mapping to reflect current models. In accordance with the MGR, changes to natural hazard mapping is not significantly different if Council gives notice to each landowner who is affected by the updated mapping about the meaning of the mapping and how to obtain further advice. This can be proposed as part of the process of giving a copy of the consultation report to each submitter.		★★	Short term (6 to 12 months)

No.	Issue	Proposed actions	Stage	Significantly different test (only applies to stage 1 updates)	FAAR update required	Priority for action	Timing
2.7	Concerns with the accuracy of the Priority evacuation areas	Adjust the Priority evacuation area boundary for submissions that raised concerns with the accuracy of the Priority evacuation areas mapped extent.	 Stage 1	Change relates to updates to the natural hazard mapping to correct identified errors. In accordance with the MGR, changes to natural hazard mapping is not significantly different if Council gives notice to each landowner who is affected by the updated mapping about the meaning of the mapping and how to obtain further advice. This can be proposed as part of the process of giving a copy of the consultation report to each submitter.		★★	Short term (6 to 12 months)
2.8	Concerns with the accuracy of the Priority evacuation areas	Review the Priority evacuation areas mapping and consider whether to include all Priority evacuation areas in the Flood risk and overland flow overlay map, or just those with noted evacuation limitations in the IICP TER. Consideration should also be given to any consequential changes where properties were identified for a density change (i.e., rezoning to arrest any further intensification of development on the site) as a result of the inclusion of the properties in a Priority evacuation area.	 Stage 2	Not applicable. Subject of a potential future amendment to the Ipswich Plan.		★★★	Medium term (1 to 2 years)
2.9	Concerns with the accuracy of the	Undertake evacuation capability assessments for all Priority evacuation area clusters to inform the review and		Not applicable. Subject of a potential future amendment to the Ipswich Plan.		★★	Long term




No.	Issue	Proposed actions	Stage	Significantly different test (only applies to stage 1 updates)	FAAR update required	Priority for action	Timing
	Priority evacuation areas	update of the associated Priority evacuation area mapping in the Ipswich Plan, having regard to property boundaries and blocks of properties over time.	Stage 4				(over time)
2.10	Concerns with the accuracy of the zoning mapping changes	Clarify how or whether the Residential density reduction candidate sites referred to within the FAAR received a reduced development limitation, such as via a zoning change or density reduction within the draft Ipswich Plan.	 Stage 1	Change relates to updates to the natural hazard mapping to correct identified errors. In accordance with the MGR, changes to natural hazard mapping is not significantly different if Council gives notice to each landowner who is affected by the updated mapping about the meaning of the mapping and how to obtain further advice. This can be proposed as part of the process of giving a copy of the consultation report to each submitter.		***	Short term (6 to 12 months)
3. Process for making a planning change to reduce a material risk of serious harm to persons or property from natural hazards							
3.1	Preparation of a consultation report	Prepare a consultation report considering submissions made about the proposed change and provide a copy of the report to each submitter and make a copy publicly available.	 Stage 1	Not applicable. This relates to plan making process matters.		***	Short term (6 to 12 months)
3.2	Finalisation of the FAAR	Update and finalise the FAAR, reflecting any changes made to the Flood risk and overland flow overlay code and mapping in response to	 Stage 1	Not applicable. This includes updates as part of the finalisation of the FAAR, which is not a local planning instrument.		***	Short term (6 to 12 months)

No.	Issue	Proposed actions	Stage	Significantly different test (only applies to stage 1 updates)	FAAR update required	Priority for action	Timing
		matters raised in submissions, where appropriate.					
4. Other matters							
4.1	Clarifications of flood studies and information	Consider including current flood planning levels in the property report available from Council's online planning scheme mapping.	 Stage 3	Not applicable. Relates to supporting implementation material.		★	Short term <i>(6 to 12 months)</i>

3.3 Consideration of changes to the FAAR

Council has sought advice on a number of matters related to consequential changes to the FAAR in response to matters raised in submissions. The following **Table 3-4** provides an overview of potential consequential changes in response to matters raised in submissions, and the resultant impact on the FAAR for Council's consideration.

Table 3-4: Consideration of changes as part of the finalisation of the FAAR

No.	Issue	Significantly different test	Stage	FAAR requirements	FAAR update required	Recommendation
1	A number of matters raised in submissions may result in changing the zoning of a property back to the existing zone under the current Ipswich City Planning Scheme.	A change back to a property's existing zone under the current Ipswich City Planning Scheme is not considered significantly different as it is consistent with the existing zoning policy intent for that property.	 Stage 1	Updates as part of the finalisation of the FAAR will be required to remove any affected properties identified for a rezoning under the draft new planning scheme, which are being changed back to their existing zone as part of the finalisation of the new planning scheme.		Update the FAAR as part of the finalisation of the new planning scheme to remove any affected properties changing back to their existing zoning.
2	The identification of additional properties requiring a zoning change to a Limited development zone or Environmental management zone given the nature of flood risk across the site	A change to back zone a property from an existing Residential zone (for example) which was not included as part of the public consultation of the draft Ipswich Plan, is likely to be considered a significantly different change as it will alter the levels of assessment for existing uses provided by that zone.	 Stage 2	A changes to back zone a property to a Limited development zone, or Environmental management zone, for example, to reduce a material risk of serious harm to persons and property from natural events or processes, is likely to be considered an adverse planning change, for which a FAAR will be required.		A FAAR would be required as part of any future amendment to rezone properties to reduce a material risk of serious harm to persons and property from natural events or processes.

3	Retention of existing Recreation or Environmental management split zones where the property is also impacted by flood risk	Not applicable. The retention of existing Recreation or Environmental split zones were publicly consulted as part of the draft Ipswich Plan.	Not applicable	The retention of existing Recreation or Environmental management split zones does not result in changes to a property to reduce a material risk of serious harm to persons and property from natural events or processes, as the property is already included in a Recreation or Environmental management split zone.		No changes required.
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