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To: Strategic Planning Unit

Ballarat City Council

RE: Objection and Submission to Amendment C217ball — Proposed LSIO2 Mapping Affecting Property Adjacent to [redacted] which are streets adjacent to river/waterway corridor - Land Subject to Inundation Overlay (LSIO2)

My Name is [redacted] and I wish to formally object to the proposed application and extent of the LSIO2 overlay affecting the property where I reside and surrounding residential land within the [redacted] area and provide the following in support of my objection and submission.

I am writing as a long-term resident of the [redacted] area who has lived in this neighbourhood for more than 25 years.

During that time, I have experienced the area through countless rainfall events, storms and periods of prolonged wet weather. My comments are based not on ownership or development interests, but on the practical observations that come from living in the neighbourhood over a long period and witnessing how the area behaves during major weather events.

Throughout more than two decades in this area, I have not observed the type of flooding that would lead an ordinary resident to conclude that the established homes within the affected section of [redacted] function as part of a natural floodplain. While water can collect and move through low-lying areas during heavy rain, there is a significant difference between temporary surface runoff and the level of flood risk that would justify the application of permanent planning controls over established residential land.

One of the defining characteristics of this area has always been the nature of the local road and drainage infrastructure. [redacted] remains majority unsealed and lacks the formal kerb and channel drainage systems commonly found in urban residential areas. During heavy rainfall, water naturally follows road reserves, low points and informal drainage paths.

From a resident's perspective, it appears that the movement of water within this locality is heavily influenced by the condition and capacity of public infrastructure rather than solely by flooding associated with the nearby creek corridor.

This raises an important concern. If public roads and drainage corridors are functioning as overland flow paths because of limited or absent drainage

infrastructure, then it is reasonable to question whether the exhibited mapping is identifying a natural floodplain risk or whether it is, at least in part, reflecting infrastructure constraints that could potentially be addressed through future works.

The flood study itself acknowledges that stormwater infrastructure can significantly influence inundation behaviour and recognises that road reserves can operate as overland flow paths during flood events. The study also notes that gaps existed within available drainage information and that certain drainage network details, including invert levels and culvert information, were inferred using engineering judgement and topographical interpretation. These acknowledged limitations are particularly relevant in locations such as [redacted] where formal drainage infrastructure is limited or absent.

As someone who has lived in this area for more than 25 years, I believe these factors warrant careful examination before permanent planning controls are imposed on long-established residential properties.

I am also concerned that the proposed overlay is based on modelling of a 1% Annual Exceedance Probability event under projected year-2100 climate change conditions. While planning authorities must consider future climate impacts, the proposed controls are therefore based on a highly conservative future scenario rather than demonstrated flooding impacts to existing homes under present-day conditions.

The exhibited flood study further notes that the overlay boundaries were refined and smoothed from raw modelling outputs as part of the overlay generation process. This suggests that the final planning boundaries are not fixed representations of flood behaviour and may warrant further local review where site-specific circumstances justify closer examination.

Council's consultation material indicates that the flood modelling will assist in identifying future flood mitigation measures, including stormwater infrastructure improvements. This is a particularly important consideration for residents of Whitefield Street.

If future drainage and stormwater upgrades may alter inundation behaviour, then it is reasonable to question whether permanent planning controls should be imposed before those mitigation opportunities have been fully investigated and assessed.

To date, I have been unable to identify any specific drainage improvement proposals for the Whitefield Street area despite the apparent role that local road and drainage conditions may be playing in the exhibited flood mapping.

The Whitefield Street area is a long-established residential neighbourhood. Families have lived here for decades and the surrounding homes have existed through numerous significant rainfall events without any widespread history of dwelling inundation. In my view, this history should be given appropriate weight when assessing whether the extent of the proposed overlay is proportionate to the actual level of risk experienced by residents.

I respectfully request that Council:

• Give appropriate consideration to the long-term observations of residents who have lived in the area through numerous major rainfall events.

- Review whether the exhibited inundation extent is being influenced by the absence of formal drainage infrastructure within the adjoining road reserve.
- Investigate whether the road reserve is effectively functioning as a stormwater conveyance path due to infrastructure limitations.
- Consider whether practical drainage or stormwater upgrades could materially reduce the extent of the mapped inundation area.
- Reassess whether the proposed overlay boundaries accurately reflect the level of risk to established homes within the area.
- Undertake further localised assessment before finalising permanent planning controls affecting long-established residential land.

My intention is not to oppose appropriate flood management measures. Rather, it is to ensure that planning decisions affecting established neighbourhoods are based on a complete understanding of local conditions, including the practical experience of residents who have observed the area over many years.

Thank you for considering my submission.

Yours faithfully,

[redacted]