14 May 2026
City of Ballarat
Strategic Planning Team
strategicplanning@ballarat.vic.gov.au

Dear Sir/Madam,

I am writing to formally object to Amendment C217ball (Ballarat 11 Waterways Planning Scheme Amendment) as it impacts [redacted] under the *Planning and Environment Act 1987 (Vic)*.

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1. Inadequate site-specific justification and evidentiary basis

The amendment relies on the Ballarat 11 Waterways Flood Study to support the proposed mapping changes. However, the exhibited material does not clearly show how broad modelling results have been converted into accurate controls for individual properties.

For 19 Signature Drive in particular:

- The modelling assumptions are not clearly tied to what is happening on the ground at the site.
- There is not enough evidence to show that local drainage infrastructure has been properly considered in the final mapping.

Without that detail, it is not possible to be confident that the proposed overlay reflects the actual flood risk at this property.

I made this point in my original submission (15 July 2024) - in my view, the flood modelling has not been sufficiently smoothed or trimmed to better reflect site conditions – rather it mirrors a "saw toothed", which does not reflect reality. If there was further sensitivity analysis **the property at [redacted] should be excluded from the Ballarat 11 Waterways Planning Scheme Amendment.**

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2. Inconsistency with the Ballarat Planning Scheme (Clause 02 – Municipal Planning Strategy)

The Municipal Planning Strategy requires that planning decisions:

- Respond to local context and conditions
- Ensure land use controls are evidence-based and appropriately targeted
- Support orderly and sustainable development of established residential areas

Applying flood controls to [redacted] appears inconsistent with these objectives because the exhibited material does not clearly show a level of flood risk that justifies the proposed controls.

There also appears to be too little supporting data and sensitivity testing to properly refine the contours and avoid including properties at the margins.

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3. Planning Policy Framework considerations

Clause 13.01 (Floodplains and natural hazards)

This clause requires that planning authorities:

- Identify flood risk based on **accurate and reliable information**
- Ensure planning responses are proportionate to the level of risk

The current mapping does not clearly show that this [redacted] is affected by flooding in a way that justifies a flood overlay. It appears to rely heavily on broad strategic modelling inputs (as Fixed model inputs) without enough refinement at the individual property level. As an example, the Manning's (n) coefficient does not appear to have been adjusted to reflect the actual conditions. This also applies to the Routing Parameter (kc) and the Average Reach Distance (Dav) adopted for the RORB modelling - noting that both these factors are based on estimates. As the final flood overlays are settled, the coefficient and modelling factors should be further refined to match real site conditions and **meet practical outcomes**. In doing so, **the property at [redacted] should be excluded from the Ballarat 11 Waterways Planning Scheme Amendment.**

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4. Misalignment with Clause 44.03 and Clause 44.04 overlay purposes

The Land Subject to Inundation Overlay (LSIO) and Floodway Overlay (FO) are intended to apply only where land:

- Is subject to inundation; or
- Performs a functional role in flood storage or conveyance

The property at [redacted] does meet these criteria to a degree that justifies these controls. The exhibited material does not clearly show:

- That it provides meaningful flood storage function
- That the hazard level is sufficient to warrant statutory control

This concern is supported by:

- Appendix 1 - C217ball_FloodOverlayMap1_[redacted].pdf and
- Appendix 2 - C217ball_FloodOverlayMap2_[redacted].pdf

These documents show only minimal flood intrusion, with the area under the flood contour measuring just 1.38 m2 and 5.93 m2 respectively.

For that reason, there is a real concern that the proposed overlay goes beyond its intended planning purpose. In the case of 19 Signature Drive Alfredton, the exhibited material does not clearly establish that the property meets the relevant criteria, creating a real risk that controls are being applied where they are not warranted. As such **the property at [redacted] should be excluded from the Ballarat 11 Waterways Planning Scheme Amendment.**

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5. Disproportionate impact and lack of net community benefit

Applying a flood overlay has significant practical consequences, including:

- Additional planning permit requirements for buildings and works
- Increased compliance costs
- Potential impacts on property value and
- Increase in insurance premiums

Those impacts should be weighed against the level of flood risk that has actually been shown. In this case, the amendment does not adequately demonstrate that the benefit of applying the overlay to [redacted] outweighs the social and economic cost. Again, I refer to:

Appendix 1 - C217ball_FloodOverlayMap1_[redacted].pdf and
Appendix 2 - C217ball_FloodOverlayMap2_[redacted].pdf

These documents show only minimal flood intrusion, with the area under the flood contour measuring just 1.38 m2 and 5.93 m2 respectively.

On that basis, the amendment does not clearly show the **net community benefit** required by the broader planning framework and therefore **the property at [redacted] should be excluded from the Ballarat 11 Waterways Planning Scheme Amendment.**

6. Conclusion

As exhibited and specifically in reference to [redacted], the amendment does not adequately show that it aligns with the City of Ballarat Planning Scheme, including:

- The Municipal Planning Strategy (Clause 02)
- The Planning Policy Framework (Clause13.01)
- The proper application of overlay controls (Clauses 44.03 and 44.04)

In short, the proposed controls risk being imprecise, disproportionate, and inconsistent with established planning policy and statutory intent. **For [redacted] the benefit of applying the overlay does not outweigh the factors outlined in sections 1 to 5 above.**

I therefore respectfully request that:

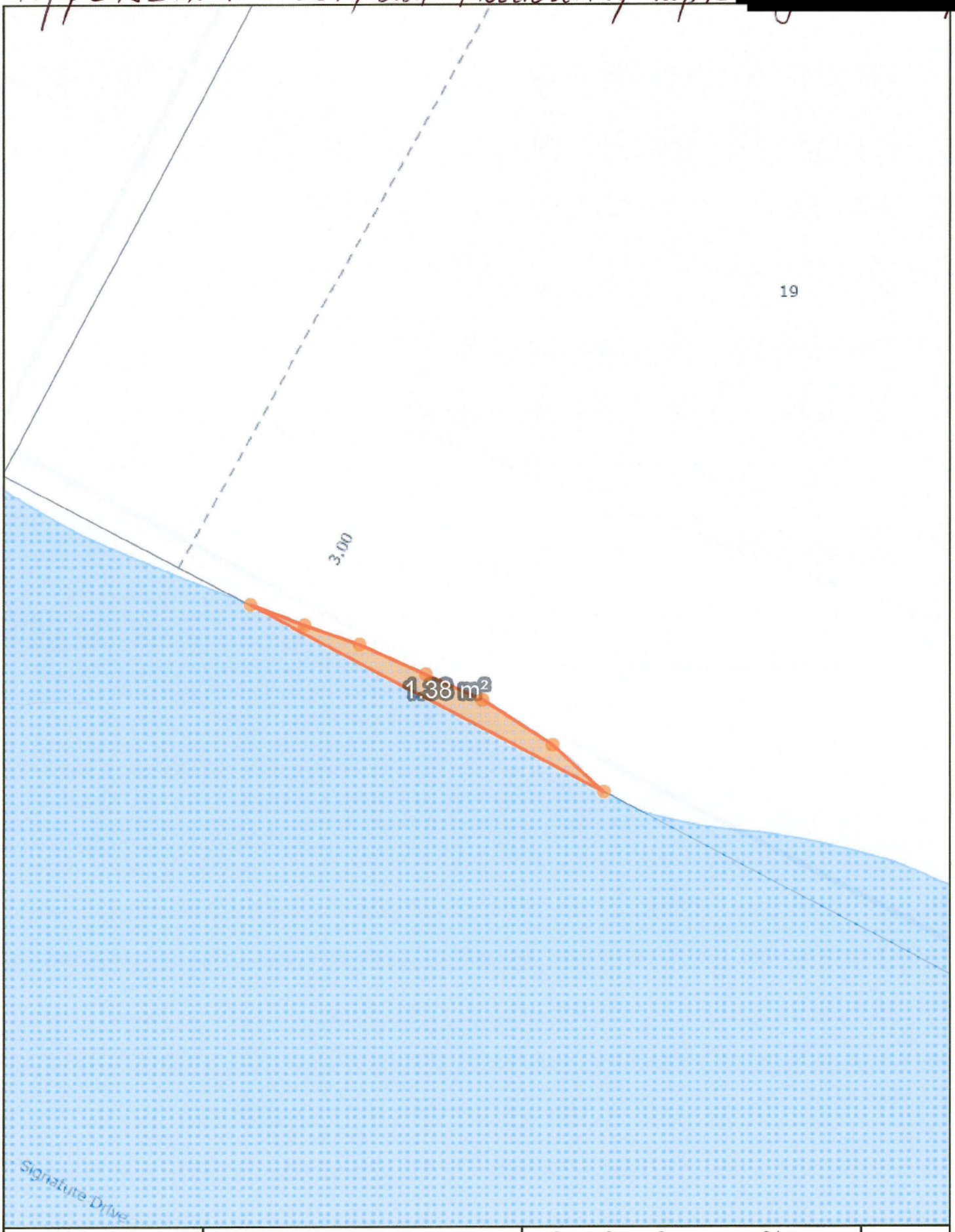
- The overlay mapping be reviewed and refined to exclude [redacted]

For these reasons, the overlay **should not be applied to** [redacted], and hence I maintain my objection to Amendment C217ball in its current form.

Yours faithfully,

[redacted]

APPENDIX 1 - C217ball – FloodOverlayMap1 – [redacted]



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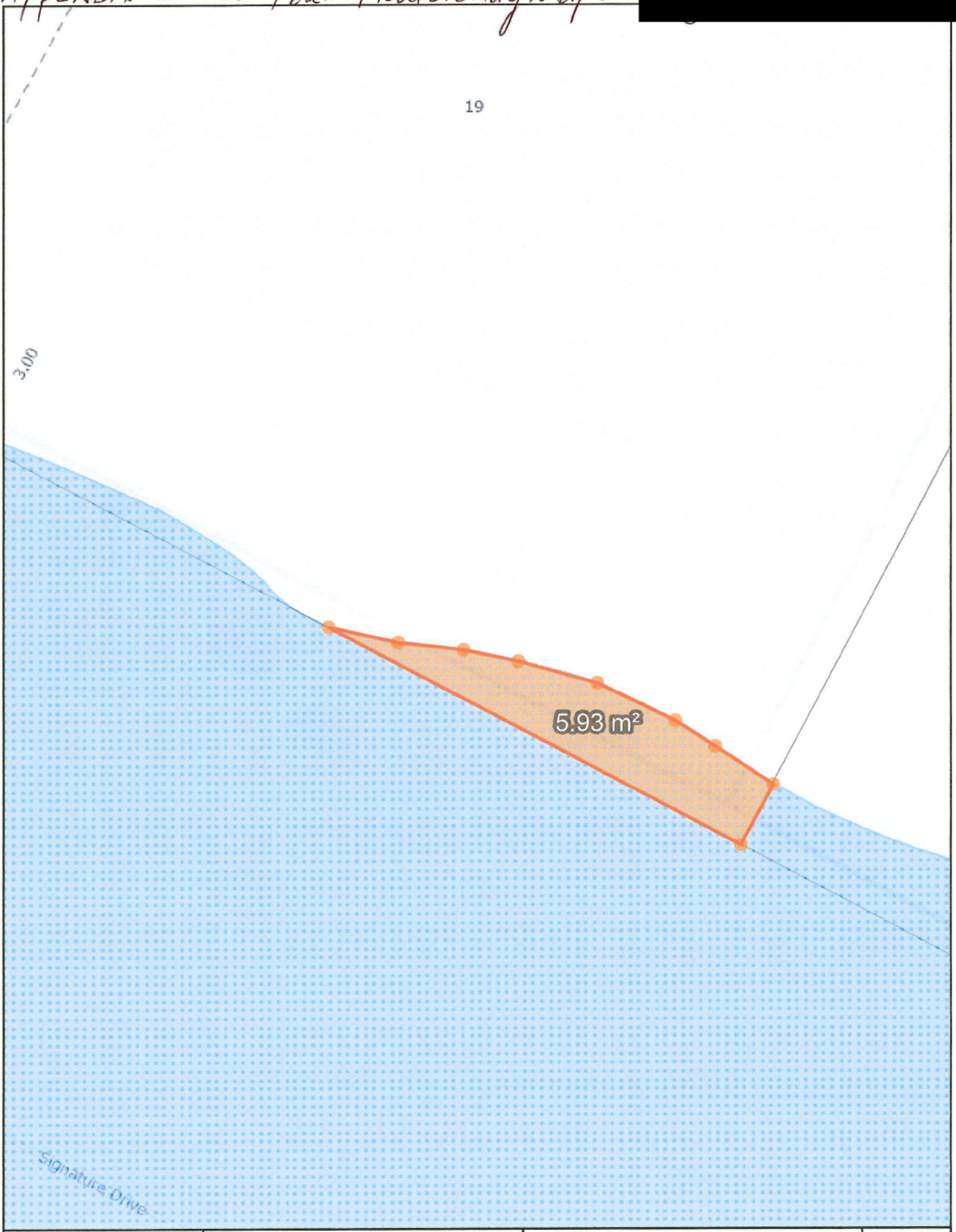
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12/05/2026 11:42 AM

Prepared by: GMSA-GIS-Prod$

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Appendix 2 – C217ball – Flood Overlay Map 2 – [redacted]



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12/05/2026 11:43 AM

Prepared by: GMSA-GIS-Prod$

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From: [redacted]
To: Strategic Planning
Subject: Re: Email_C217ball Exhibition_Flood Depth and Overlay Maps [redacted] [SEC=OFFICIAL]
Date: Tuesday, 19 May 2026 11:56:21 AM
Attachments: image001.png
image003.png
image004.png
image005.png
Amendment C217ball_[redacted]

OFFICIAL

Your attachments have been security checked by Mimecast Attachment Protection. Files where no threat or malware was detected are attached.

Hi Susie

Thanks you for your previous email

In relation to Ballarat 11 Waterways Planning Scheme Amendment (Amendment C217ball), please find attached our formal submission.

Regards, [redacted]

OFFICIAL

On Tue, May 12, 2026 at 12:38 PM Strategic Planning <strategicplanning@ballarat.vic.gov.au> wrote:

> OFFICIAL
>
> Hi [redacted]
>
> Thank you for your time on the phone last week.
>
> Please find attached the maps you requested:
>
> - Map of the maximum distance the flood mapping reaches into your property showing flood depths as contours.
>
> - Two maps showing the Overlay and a measure of the areas of the overlay incursion.
>
> Please reply email if you have any further questions or requests, or to make a formal submission in relation to the proposed Planning Scheme Amendment (PSA).
>
> Kind regards
>
> [redacted]

Strategic Planning

W: ballarat.vic.gov.au



Latest news | mysay.ballarat.vic.gov.au |

The City of Ballarat acknowledges the Traditional Owners of the land we live and work on, the Wadawurrung and Dja Dja Wurrung Peoples, and recognises their continuing connection to the land and waterways. We pay our respects to their Elders past and present and extend this to all Aboriginal and Torres Strait Islander Peoples

OFFICIAL

From: Paul Donohue [redacted]>
Sent: Monday, 4 May 2026 5:10 PM
To: Strategic Planning <strategicplanning@ballarat.vic.gov.au
Subject: Re: Ballarat 11 Waterways – C217ball Planning Scheme Amendment - Exhibition Now Open [SEC=OFFICIAL]

OFFICIAL

Warning: This message has originated outside the City of Ballarat. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Hi

In reference to the below, can you please call me to discuss the property [redacted]. I am available after 4pm tomorrow.

Thanks [redacted]

[redacted]

OFFICIAL

On Thu, 30 Apr 2026 at 2:37 pm, Strategic Planning <strategicplanning@ballarat.vic.gov.au> wrote:

> OFFICIAL
>
> Dear Submitters and Interested Parties,
>
> We are writing to let you know that the Ballarat 11 Waterways Planning Scheme Amendment (Amendment C217ball) has now commenced formal public exhibition.
>
> You are receiving this email because you previously made a submission during the Ballarat 11 Waterways Flood Study community engagement or have otherwise registered an interest in the project.
>
> **What is being exhibited?**
>
> The Planning Scheme Amendment proposes to apply updated flood and stormwater planning overlays to land affected by flooding across eleven waterways in Ballarat. The amendment is based on the completed Ballarat 11 Waterways Flood Study, prepared by the City of Ballarat in partnership with the Corangamite Catchment Management Authority.
>
> **Have I received a letter?**
>
> Owners and occupiers of land directly affected by the proposed overlays are being notified in writing by post as part of the statutory process.
> If you are currently an owner or occupier of affected land, you may already have received — or will shortly receive — a formal notice letter.
>
> This email is provided as an additional update for people who previously engaged with the project or requested to be kept informed.
>
> **How can I find out more?**
>
> All amendment documents, including maps, the Explanatory Report, and information on how to make a submission, are available on the project's MySay page:
> https://mysay.ballarat.vic.gov.au/ballarat-11-waterways-flood-modelling

Making a submission

Any person may make a formal submission during the exhibition period.
Details on how to do this, including submission closing dates, are available on MySay Ballarat and in the formal notice letters.

If you have questions about the amendment, the exhibition process, or how to make a submission, you can contact the City of Ballarat Strategic Planning team via reply email.

Thank you again for your interest and engagement in flood planning for Ballarat.

Kind regards,
Strategic Planning Team

Strategic Planning

W: ballarat.vic.gov.au



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The City of Ballarat acknowledges the Traditional Owners of the land we live and work on, the Wadawurrung and Dja Dja Wurrung Peoples, and recognises their continuing connection to the land and waterways. We pay our respects to their Elders past and present and extend this to all Aboriginal and Torres Strait Islander Peoples

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