From: [redacted]
To: Strategic Planning
Cc: [redacted]
Subject: Integra Submission to C217ball
Date: Friday, 29 May 2026 3:58:30 PM
Attachments: image001.png
image002.png
image003.png
image004.png
Integra Submission C217ball Final.pdf

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Good afternoon

Please find attached submission to draft Amendment C217ball.

Regards

[redacted]
Project Development and Planning Facilitation

Integra
a better lifestyle

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29 May 2026

City of Ballarat – Strategic Planning
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Ballarat VIC 3353

strategicplanning@ballarat.vic.gov.au

Dear Strategic Planners

RE: Submission to Amendment C217ball

1. Introduction

Thank you for the opportunity to make a submission to Amendment C217ball, which proposes to introduce flood overlay controls arising from the *Ballarat 11 Waterways Flood Study* (Water Technology, 2025).

This submission is made by Integra, acting on behalf of the landowners and development partners controlling the following land (see Figure 1):

- Property A - [redacted]); and
- Property B - [redacted])
- Property C - [redacted]

Figure 1 Integra Controlled Land



Integra acknowledges that the preparation of a comprehensive flood study and associated amendment documentation is a complex and challenging process. Integra also supports the principle of maintaining up-to-date flood controls.

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However, Integra has identified significant concerns with the accuracy of the underlying data, modelling inputs, and mapping outcomes, and the resulting impact of the proposed controls on the subject land.

For these reasons, we **strongly object** to the Amendment as exhibited.

2. Key Issues

It is submitted that:

- current climate change science has evolved since the adoption of the RCP 8.5 scenario, with recent guidance reducing reliance on this extreme emissions pathway. The use of such a conservative scenario is therefore likely to result in an overstatement of flood extents, and the modelling should be reviewed to ensure it reflects contemporary and more relevant climate change projections;
- the flood modelling does not adequately account for recently constructed drainage infrastructure, including works undertaken post 2023, nor does it reflect key future infrastructure identified within the Ballarat West PSP and DCP. For example,
    - DCP Pipe 117 within Property A has been excluded from the modelling, which therefore overstates flooding along its frontage.
    - The open drain extending south from Wetland RB3 within the Winter Valley Rise Estate appears to have been omitted, contributing to increased inundation across Properties B and C.

  Accordingly, the modelling is not based on current or complete conditions;
- the Amendment will impose significant economic impacts and materially constrain the development potential of strategically significant land identified for infill and future urban growth;
- there has been a long-standing history of drainage issues affecting Property A, which are well known to Council. The extent of the proposed flood overlays is materially influenced by the non-delivery of planned drainage infrastructure, resulting in the transfer of cost and burden to landowners; and
- unresolved drainage issues should be addressed prior to the application of permanent flood controls, noting the significant impact of the overlays and the complexity and cost associated with their subsequent removal.

3. Recommendation Summary

Accordingly, it is recommended that:

- the flood modelling be reviewed and updated for all Integra-controlled land, having regard to:
    - the use of current and contemporary climate change projections, replacing overly conservative assumptions;
    - planned infrastructure identified in the Ballarat West PSP and DCP; and

- existing drainage infrastructure within the Winter Valley Rise Estate, including the open drain from the RB3 wetland basin, which has not been incorporated into the modelling and results in an inaccurate flood extent;

- the Floodway Overlay be removed from Property A and Property C, having regard to its significant planning implications and the ability for these sites to be appropriately re-engineered in the future to manage flood risk;

- Subject to remodelling any inundation should be managed through the LSIO, which provides a more appropriate and proportionate control. This would allow flood risk to be suitably addressed and, where feasible, mitigated through the preparation of a stormwater management plan during a future development application.

- Council, Water Technology and Integra work collaboratively to undertake a site-specific review and resolve the issues identified.

Subject to the above matters being satisfactorily resolved, Integra would be willing to reconsider its objection.

4. Property A - [redacted])

The property is located in Alfredton, on the western growth interface of Ballarat.
The land has the following key characteristics:

- it is approximately 32 hectares and is currently undeveloped, consisting of a cleared open paddock;
- it is bisected by Kensington Creek, which divides the land into distinct eastern and western portions;
- it has frontage to Ballarat–Carngham Road, which is partly affected by a Public Acquisition Overlay (PAO); and
- it performs an important buffer and transition function between established industrial land to the east and residential land to the west.

The strategic significance of the site for infill development is reinforced by the following policy:

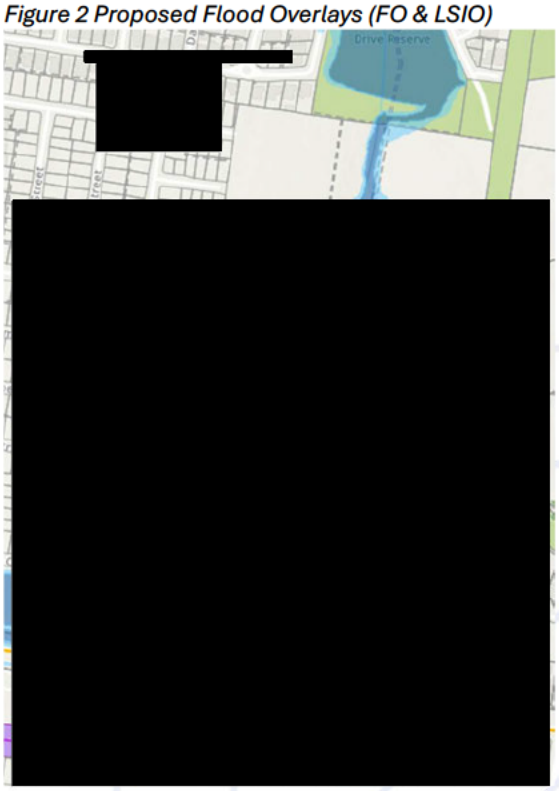
- the *Ballarat Housing Strategy 2041* identifies the site as one of a limited number of areas capable of accommodating substantial change. The land is located within a broader urban renewal area associated with the La Trobe Street Saleyards Precinct, with recognised potential to support increased residential density and urban transition.

Effect of Amendment C217ball
Amendment C217ball proposes to apply the Floodway Overlay (dark blue shading) and the Land Subject to Inundation Overlay (light blue shading) to the property as shown in Figure 2.

The effect of these controls is significant and includes:

- a significant encumbrance on development potential particularly where the FO is applied
- a substantial reduction in developable area;
- constraints on subdivision design and yield; and
- compromised access and frontage outcomes by constraining access arrangements and preventing direct access to Ballarat-Carngham Road on the west side of the creek

Figure 2 Proposed Flood Overlays (FO & LSIO)



Previous History

In January 2024, Integra met with the Chief Executive Officer and the Director of Planning to escalate longstanding concerns regarding drainage issues affecting the site. During this meeting, supporting material was presented, including:

- correspondence from Council Engineer [redacted] (1989);
- letters from former Director of Planning [redacted] 2015 and 2016);
- correspondence from Wright Civil Engineering to Director of Planning [redacted] (2021); and
- correspondence from Director of Planning [redacted] (2021).

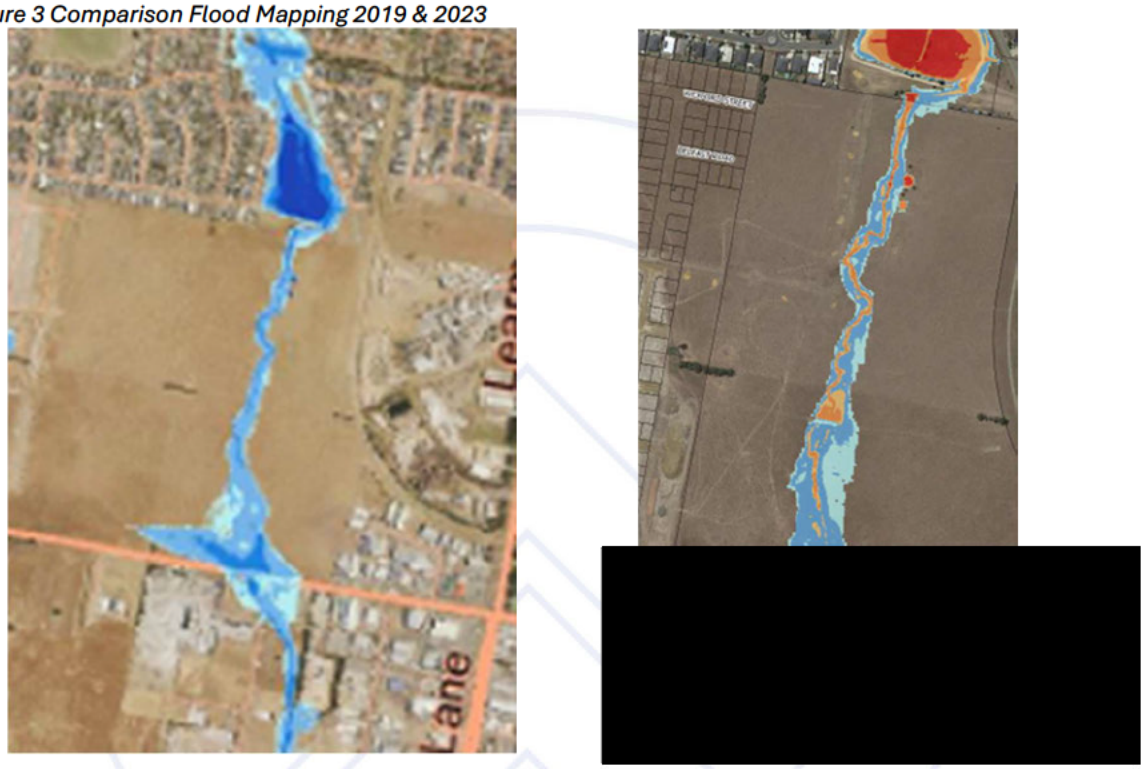
At the meeting, the Chief Executive Officer acknowledged the issues raised and indicated a willingness to take a leading role in resolving them. However, shortly thereafter, [redacted] passed away and his estate was subsequently frozen, which has delayed further progress.

The estate of [redacted] is now in a position to progress these matters. The estate has commenced the transfer of the [redacted] to Council and is seeking to resolve the outstanding drainage issues, particularly in light of the significance of Amendment C217ball and its impact on the land.

Drainage Issues Discussion

The increased inundation and flooding extents on Property A (see Figure 3) which compares 2019 flood mapping is primarily the result of the inability of the existing upstream wetland/basin in [redacted] to the north to cater for the increased flows generated from the revised criteria, particularly the extreme Climate Change considerations of the Kensington Creek modelling.

Figure 3 Comparison Flood Mapping 2019 & 2023



We understand due to the large-scale extent of the study area that modelling was limited to works completed/scheduled by late 2023. However, considering the importance and regulatory implications of the proposed Planning Scheme amendment every effort should be implemented to ensure the extents of inundation and flooding is limited.

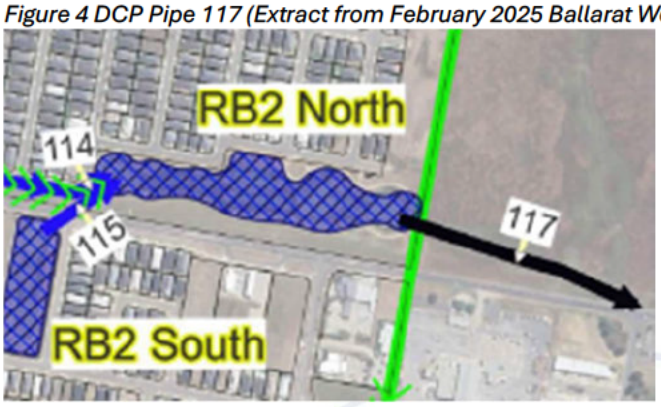
Property A is a prime example of this assessment. The current Ballarat West Precinct Structure DCP Infrastructure Plan delivers an outlet pipe (117) form the existing [redacted] basin to the existing [redacted] culvert (see Figure 4). This pipe is approximately on the alignment of the existing open channel.

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Figure 4 DCP Pipe 117 (Extract from February 2025 Ballarat West Precinct Structure Plan)



Simply by considering the implementation of BWPSP pipe 117 it is anticipated that the flood extents between the [redacted] basin and the [redacted] culvert will be eliminated.

There has been considerable correspondence and dialogue with Council representatives since 2015 regarding the on-going degradation of the existing open channel due to the discharge from the [redacted] and the probable remedial works on the waterway that traverses south through land Property A. Thie discussions have included additional funding, circa $1Million to assist in the remediation.

With an extremely cautious 2100 Climate Change scenario and a resampled surface terrain used in the Kensington Creek modelling it is extremely likely that a conservative bias in inundation prediction has been presented on Property A.

It should be acknowledged that any future development and potential rezoning of this parcel will require detailed stormwater modelling, analysis and management. The outcome of a stormwater management plan for the development of the site will certainly require the provision of detention and water quality initiatives which could assessed to include the extent of any inundation.

Recommendation:

1. **Revise the modelling to include BWPSP pipe 117 that traverses the existing [redacted] basin to the existing [redacted] culvert and the remedial improvements to the north-south open channel.**

2. **Remove the Floodway Overlay. Subject to remodelling any inundation that remains on this land should be managed through the LSIO, which provides a more appropriate and proportionate control. This would allow flood risk to be suitably addressed and, where feasible, mitigated through the preparation of a stormwater management plan during a future development application**

5. Properties [redacted], [redacted] ([redacted]) and [redacted].

Properties B and C are located within the Farming Zone, immediately south of [redacted] and directly adjoin the [redacted] Estate.

The properties are situated within the Ballarat Western Growth Area, encompassing parts of Bunkers Hill, Lucas and Smythes Creek, which is identified to accommodate approximately 13,000 to 17,000 dwellings over the long term.

Both parcels:

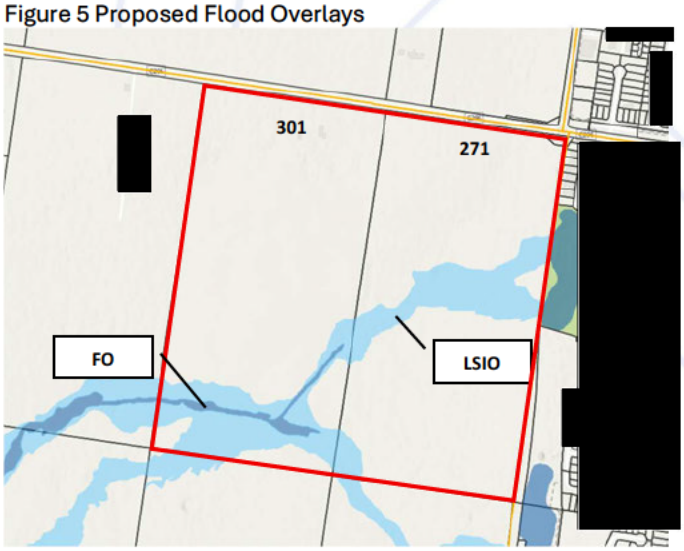
- have a rectangular configuration and an area of approximately 33 hectares each;
- are currently developed with a rural dwelling; and
- are otherwise utilised for open farmland purposes.

The properties are also influenced by the Chase Waterway, which traverses the broader area and contributes to drainage patterns and flood behaviour within the locality.

Effect of Amendment C217ball

Amendment C217ball proposes to apply the Floodway Overlay (dark blue shading) and the Land Subject to Inundation Overlay (light blue shading) to the properties as shown in Figure 5.

Figure 5 Proposed Flood Overlays

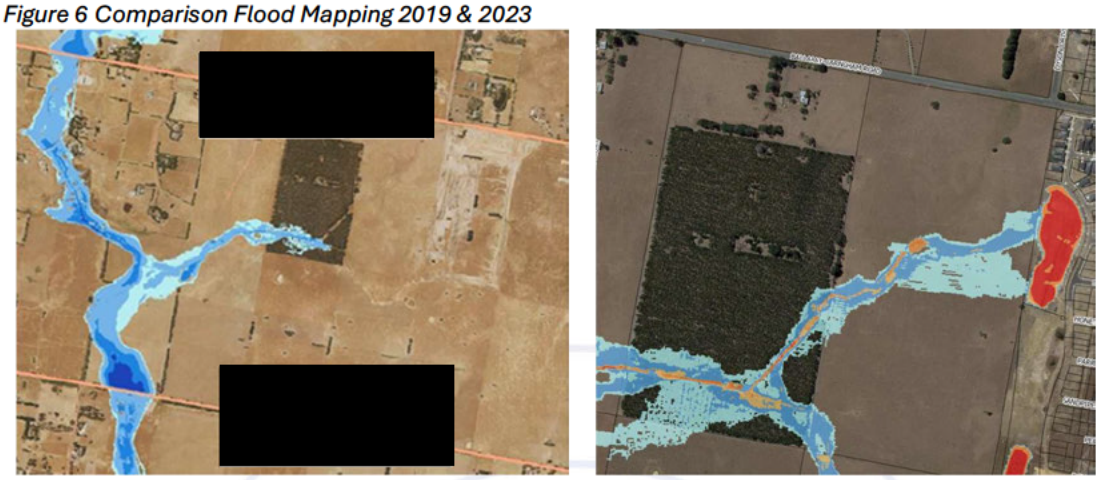


The impacts of the proposed overlays are similar to those described for Property A, with application of the FO of greatest concern.

Drainage Issues Discussion

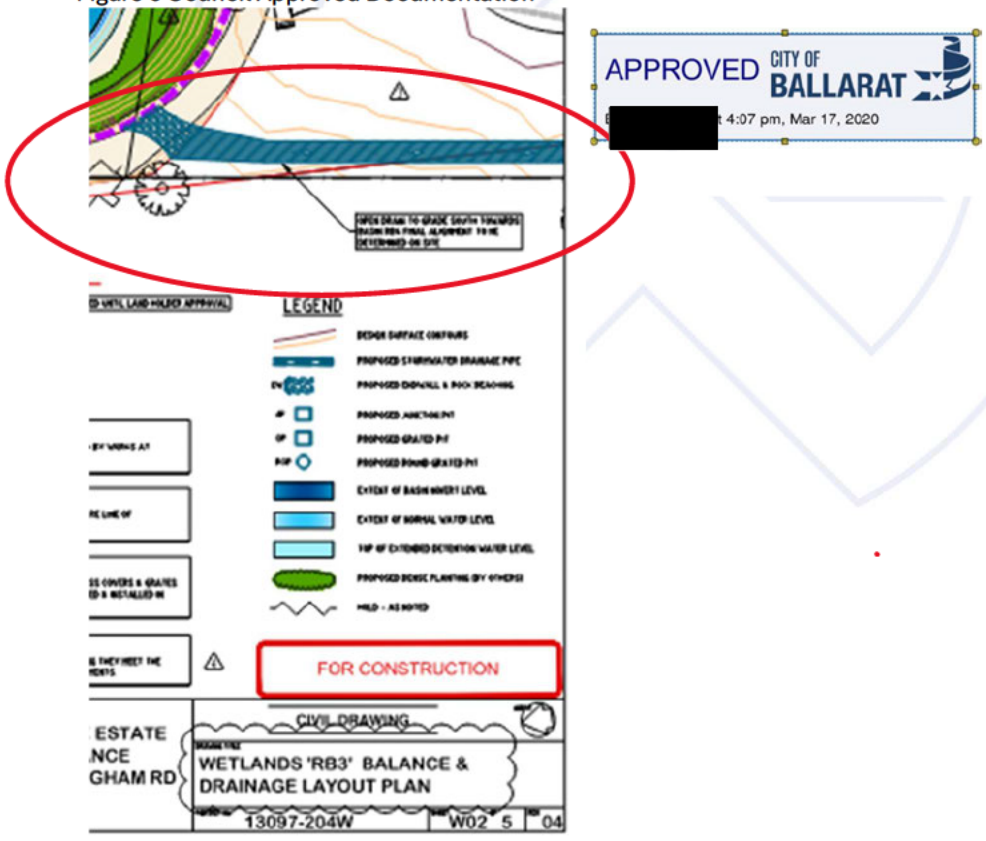
The increased inundation extents on land Property B and the increased inundation and flooding extents on land Property C (see Figure 6 for comparison flood mapping) is primarily the result of the inability of the [redacted] estate basin RB3 to cater for the increased flows generated from the revised criteria, particularly the extreme Climate Change considerations of The Chase Waterway modelling.

Figure 6 Comparison Flood Mapping 2019 & 2023



Whilst we acknowledge that the existing pipe network linking the [redacted] basins has been included in The Chase flood modelling analysis we question as to whether the open drain discharging to the south which formed part of the endorsed RB3 wetland basin has been considered.

Figure 6 Council Approved Documentation



The inclusion of the open drain would clearly reduce the inundation impact on Property B and potentially both the inundation and flood extents on Property C.

We understand that a Land Subjection to Inundation Overlay is more manageable than a flood overlay which is particularly relevant when considering these future growth land parcels in a Precinct Structure Plan context. In addition, the future Link Road will form an integral and important component of the future stormwater modelling, analysis and management of the inundation and flooding of Parcels A and B and with a continued emphasis on bringing this project to fruition it would be prudent to include modelling outcomes.

Recommendation:

3. **Revise the flood modelling to incorporate the open drain extending south from Wetland RB3, consistent with the Council-endorsed drainage documentation.**

4. **Remove the Floodway Overlay. Subject to remodelling any inundation that remains on this land should be managed through the LSIO, which provides a more appropriate and proportionate control. This would allow flood risk to be suitably addressed and, where feasible, mitigated through a future PSP/DCP process, including infrastructure delivery such as the proposed Link Road, consistent with the land's role within Council's future Growth Area.**

5. **Alternatively, mitigation works on the western embankment of wetland RB3 could be implemented to increase the detention storage capacity and remove the overland inundation immediately to the west.**

6. Conclusion

In conclusion, while Integra supports the intent of introducing updated flood controls, the exhibited Amendment relies on modelling that does not adequately reflect current or planned drainage conditions. This results in an overstatement of flood extent and the application of planning controls that impose a significant constraint on strategically significant growth land. A review and refinement of the modelling and overlay application is required to ensure a fair and proportionate outcome. Integra remains committed to working collaboratively with Council and Water Technology to resolve these issues.

Should you require any further information, please do not hesitate to contact me on [redacted] or via email at [redacted].

Regards

[redacted]

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Director of Land Development

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