To: strategicplanning@ballarat.vic.gov.au
Subject: Submission – Amendment C217ball – [redacted]

Dear Strategic Planning Team,

I write to lodge a submission regarding **Amendment C217ball** as it applies to my property at [redacted]

While I support the intent of incorporating updated flood information into the planning scheme, I have significant concerns that the proposed identification of my property as "affected" does not accurately reflect site conditions or the nature of flood behaviour in this location.

1. Site Topography and Flow Direction

Based on site inspection and mapping (including VicPlan and aerial imagery), my property:

- Exhibits a **consistent fall toward the adjoining road and downstream drainage network**, and
- Sits **upslope of the defined overland flow paths and minor waterways associated with the Chase Waterway system**

This indicates that the property functions as a **runoff source area**, rather than a location where floodwaters accumulate or are conveyed.

There is no clear evidence that the property lies within a natural drainage depression, flood storage area, or primary overland flow path.

2. Inconsistency with Modelled Flood Behaviour

The **Chase Waterway Flood Mapping Report (2023)** identifies that:

- Flooding in residential areas is generally **confined to defined overland flow paths and drainage corridors**, and
- Depths are typically **very shallow (less than 0.1 m in the 1% AEP event)**

Given the clear direction of fall across my property toward the road and waterway, it is difficult to reconcile how the property itself would experience meaningful inundation, rather than simply contributing runoff to downstream systems.

3. Likely Overgeneralisation of Catchment Modelling

The broader Ballarat 11 Waterways modelling applies a **catchment-scale hydraulic model**, which is appropriate for regional planning purposes but may:

- **Overgeneralise flow extents at a lot-by-lot scale**, and
- Capture properties that are **hydrologically connected but not actually subject to inundation**

Given the relatively coarse resolution and reliance on assumptions in ungauged areas, it is reasonable to expect that some properties may be **incorrectly included within flood overlay extents**.

4. Distinction Between Flow Contribution and Flood Risk

It is important to distinguish between:

- Land that **contributes runoff to the drainage system**, and
- Land that is **subject to inundation and associated hazard**

My property clearly falls into the former category.

Applying a flood overlay to land that is not subject to inundation would impose **unwarranted planning constraints** that are not proportionate to actual risk.

5. Request for Review and Refinement

In light of the above, I respectfully request that Council:

- **Review and verify the inclusion of [redacted] within any proposed flood overlay, including confirmation of whether modelled flood extents or depths materially intersect the property**
- Where necessary, **refine overlay boundaries to exclude land that is not subject to inundation**

If any mapping indicates minor or peripheral impact, I request that this be limited strictly to the affected portion of the land and reflect the **low hazard nature** of any such impact.

6. Supporting Site Plan (attached)

A site plan has been prepared using publicly available mapping (VicPlan and aerial imagery, attachment 1) to illustrate the relationship between the subject property and the surrounding drainage network. Attachment 1 demonstrates that the subject

property is located upslope of the identified drainage corridor, with the general direction of surface runoff flowing away from the dwelling toward lower-lying areas where flow is likely to concentrate.

This plan demonstrates that:

- The land falls **away from the dwelling and toward the road and downstream drainage lines**, and
- The subject property is **positioned upslope of identified overland flow paths**, which are located within lower-lying corridors adjacent to the Chase Waterway system

The plan supports the conclusion that the property is **not located within a natural flow path or flood storage area**, but rather contributes runoff to downstream systems.

7. Consistency with Clause 13.01-1S (Floodplain Management)

Clause 13.01-1S of the Planning Policy Framework requires that planning decisions:

- **Identify and manage flood risk based on the best available information, and**
- **Avoid development in areas of high flood hazard, while ensuring that responses are proportionate to the level of risk**

The Clause also emphasises the importance of:

- **Accurate identification of flood-prone land,** and
- Ensuring that planning controls are **commensurate with the nature and severity of the hazard**

Based on the available evidence, including the Chase Waterway Flood Mapping Report and the site context illustrated in Attachment 1, the subject property:

- Is **not located within a defined overland flow path or flood storage area,**
- Is **topographically positioned upslope of identified drainage corridors, and**
- Is unlikely to experience **meaningful inundation or flood hazard** during modelled events

In this context, the application of a flood overlay to the property would not represent a **proportionate or risk-based response,** as required by Clause 13.01-1S.

I therefore request that Council ensure that any planning controls applied are:

- **Directly aligned with actual flood hazard,** and
- Do not extend to land where the level of risk is negligible or unsupported by site-specific conditions

8. Conclusion

The available evidence indicates that my property is:

- **Topographically elevated relative to local drainage paths**,
- **Draining away from, rather than receiving, flood flows**, and
- **Unlikely to experience meaningful inundation during modelled flood events**

Accordingly, I request that Council carefully reconsider the classification of this property to ensure that any planning controls are **accurate, proportionate, and evidence-based**.

Thank you for considering this submission.

Yours sincerely,

[redacted]

Attachment 1 – Site context and flow direction plan*



*Annotations are indicative only and based on publicly available mapping and observed site conditions.