From: [redacted]
To: Strategic Planning
Cc: [redacted]
Subject: Ballarat Planning Scheme Amendment C217ball
Date: Wednesday, 10 June 2026 3:52:52 PM
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Submission Objecting to Proposed Flood Overlay.pdf

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To whom it may concern;

As discussed [redacted] wish to lodge an objection to the proposed amendment above as per attached letter. We understand that it is technically past the closing date of 29th May 2026 however is still within the window of Stage 3 'Consider Submissions' of the Planning Scheme Amendment Process and therefore would be very grateful if this application can be viewed alongside the other applications during this window.

Should you have any further queries please do not hesitate to contact myself on [redacted].

Kind Regards [redacted]

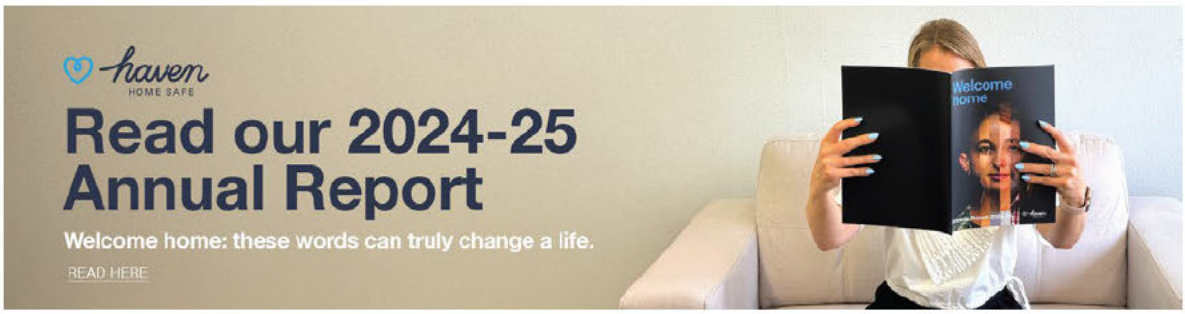
[redacted]
Head of Assets

[redacted]

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[redacted]

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[redacted]

10 June 2026

Strategic Planning Unit
City of Ballarat
25 Armstrong Street South
Ballarat VIC 3350

Re: Submission objecting to Amendment C217ball – proposed flood overlay affecting [redacted] properties listed below;

- [redacted]

Dear Sir/Madam,

[redacted] objects to Amendment C217ball to the Ballarat Planning Scheme insofar as it proposes to apply a flood overlay to the social housing properties listed above.

[redacted]

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[redacted] is a registered Affordable Housing Association and the owner and manager of these properties. The affected dwellings provide essential social and affordable housing for vulnerable members of the Ballarat community.

Our objection is framed around the potential impact of the proposed overlay on the ongoing provision, management and financial sustainability of social housing.

The affected properties were lawfully developed, approved and constructed in accordance with the planning controls and requirements that applied at the time of development. They now form part of [redacted] long-term social housing portfolio and represent an important community asset.

The proposed overlay may create significant and ongoing financial impacts for [redacted] including increased insurance premiums, higher insurance excesses, reduced insurer appetite, increased compliance costs, and potential impacts on asset valuation and future financing arrangements.

As a not-for-profit social housing provider, [redacted] has limited resources that must be directed toward maintaining existing homes, supporting tenants, and delivering additional housing for people in need. Any increase in operating costs associated with these properties directly reduces the resources available for those purposes.

The affected properties are not speculative development sites. They are existing homes occupied or available for occupation by people who rely on social and affordable housing. The broader social impact of applying new planning controls to existing social housing assets should therefore be carefully considered.

[redacted] is concerned that the proposed overlay may have unintended consequences for the long-term viability and management of these homes, including:

- increased costs to insure and maintain existing social housing dwellings;
- reduced capacity to reinvest in the affected properties;
- potential limitations on future upgrades, renewal or redevelopment of social housing assets;
- additional administrative and compliance costs;
- impacts on asset values and borrowing capacity; and
- reduced ability to deliver or expand social housing within the municipality.

These impacts are particularly concerning given the current demand for social and affordable housing. Planning decisions that increase the cost of holding, maintaining or renewing

[redacted]

[redacted]

existing social housing stock should be approached with caution and should give proper weight to the public benefit delivered by these homes.

[redacted] acknowledges the importance of responsible planning and risk management. However, where proposed planning controls affect existing social housing assets, the social and financial consequences should be expressly considered as part of the amendment process.

Accordingly, [redacted] requests that the planning authority:

• remove the proposed flood overlay from the social housing properties listed above; or
• otherwise exempt existing social housing assets from any unreasonable financial or administrative burden arising from the proposed overlay; or
• defer application of the overlay to these properties pending further consultation with [redacted] regarding the social housing impacts.

Should this matter proceed to a Planning Panel hearing, [redacted] requests the opportunity to be heard in support of this submission.

Please direct any correspondence regarding this submission to:

[redacted]

Yours sincerely,

[redacted]

[redacted]