

From: [REDACTED]
To: [Strategic Planning](#)
Subject: Submission Regarding Ballarat Planning Scheme Amendment C217ball
Date: Friday, 29 May 2026 1:32:55 PM

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Submission to Ballarat Planning Scheme Amendment C217ball - Proposed LSIO2 Mapping Affecting Property on Whitefield Street

Submitter: [REDACTED]
Submitter's Email: [REDACTED]
Property affected: [REDACTED]

Dear City of Ballarat - Strategic Planning,

As the property owner of [REDACTED], I object to the proposed application and extent of the Land Subject to Inundation Overlay (LSIO2) affecting my property on [REDACTED].

I acknowledge that the exhibited mapping identifies a river/waterway corridor in the vicinity of the property. However, I am concerned that the proposed overlay extent may be influenced not only by inherent river flood behaviour, but also by existing deficiencies in local public drainage and road infrastructure.

The affected residential area has been established and occupied for many decades. The dwelling has existed as part of a long-standing residential area, and to my knowledge there has been no history of internal dwelling inundation despite numerous significant rainfall events over many years.

In these circumstances, I am concerned that the amendment may impose substantial and ongoing planning constraints on established residential land without adequately distinguishing between natural river flooding, overland stormwater runoff, road reserve flow paths, and inundation behaviour that may be caused or worsened by inadequate public drainage infrastructure.

The proposed overlay has potentially significant consequences for affected landowners, including impacts on future building works, extensions, renovations, subdivision potential, redevelopment opportunities, insurance availability and cost, property value, and the long-term use and development expectations of established residential land.

The road reserve adjoining the property is unsealed, lacks formal kerb and channel drainage, lacks underground stormwater infrastructure, and appears to operate at least partly as an uncontrolled overland flow path during rainfall events.

It is therefore unclear whether the current modelling has appropriately distinguished between natural river flooding and stormwater behaviour caused or exacerbated by the lack of formal drainage infrastructure in the road reserve.

I am concerned that the modelling may effectively attribute flood storage or conveyance functions to private residential land because public drainage infrastructure has either not been installed, not been upgraded, or is otherwise inadequate to manage runoff within the road network.

If this is occurring, the amendment risks transferring the consequences of public infrastructure shortcomings onto existing private landowners through the application of permanent planning controls.

The exhibited flood study material acknowledges that stormwater infrastructure can play a controlling role in inundation behaviour within urban areas. It also recognises that road reserves can function as overland flow paths during flood events and that floodwaters may travel through developed areas via road reserves and surrounding land.

Those matters are particularly relevant to the [REDACTED] area based on local conditions, where formal drainage infrastructure appears limited or absent and where the adjoining road reserve appears to function as part of the local overland flow path during rainfall events.

I am also concerned by the extent to which the modelling relies on drainage assumptions rather than complete verified infrastructure information. The Water Technology material notes that gaps existed within drainage network datasets, that pit and pipe invert information was often missing, and that some invert levels were inferred using assumptions, topographical information, engineering judgement and other indirect methods.

These limitations are particularly significant in an area such as [REDACTED] where drainage infrastructure appears minimal, informal or absent altogether.

The reports also acknowledge that hydraulic controls and infrastructure conditions can materially alter flood modelling outcomes. In particular, the modelling material shows that inclusion or exclusion of hydraulic controls can significantly alter modelled flow behaviour in other parts of the municipality.

This raises a legitimate concern that localised road reserve behaviour, drainage limitations and infrastructure assumptions may materially influence the exhibited inundation extent affecting my property.

I further note that the exhibited LSIO mapping is based on modelled flood outcomes, including a 1% AEP flood event under year 2100 climate change scenarios, including RCP 8.5 assumptions. While future climate resilience is an important planning consideration, the overlay therefore appears to reflect a highly conservative future-climate modelling scenario rather than demonstrated present-day flooding impacts to established dwellings.

The exhibited overlay boundaries have also been refined and smoothed from raw modelling outputs as part of the planning overlay generation process. This indicates that the final overlay boundaries are not purely fixed or absolute representations of flood behaviour and may be capable of further refinement where local conditions warrant closer review.

I acknowledge that the flood modelling has been undertaken at a detailed municipal scale and that it has been peer reviewed. However, the study material also records that methodological differences were identified during peer review and that sensitivity testing produced different flood levels and extents, even if those differences were described as minor. This reinforces the need for caution and localised review where established residential dwellings are affected at the fringe of mapped inundation.

The affected land forms part of an established residential environment rather than undeveloped floodplain land. The property contains a long-established dwelling that has functioned as residential land for many decades without known internal flooding impacts to the dwelling itself.

Based on the exhibited mapping available to me, there also appears to be a distinction between the broader lot-based inundation extent and the actual location of the established dwelling. The principal flood conveyance appears to be within the river/waterway corridor, while the dwelling appears to sit on the fringe of the mapped inundation extent.

This raises the question of whether the exhibited overlay appropriately differentiates between the main flood corridor, flood fringe areas, road reserve flow behaviour, and established dwelling envelopes.

Given the long-standing residential occupation of the land, I request that Council carefully consider whether the proposed overlay extent is proportionate to the actual demonstrated level of risk affecting the existing dwelling.

The amendment should not operate as a substitute for necessary public drainage or stormwater infrastructure upgrades where practical mitigation measures may materially alter the extent of inundation mapping.

I also note that Council consultation material states that the flood modelling will inform future flood mitigation measures, including stormwater infrastructure upgrades. This raises a concern that parts of the exhibited overlay extent may be influenced by existing

infrastructure limitations that Council itself anticipates may require improvement or mitigation.

Despite this, I have been unable to identify any specific drainage upgrade or mitigation works proposed for the [REDACTED] area, despite the apparent influence of local road and drainage conditions on inundation behaviour.

In circumstances where the adjoining road reserve lacks formal drainage infrastructure and appears to function as an overland flow path, I respectfully submit that further localised engineering assessment should occur before permanent planning controls are applied to established residential land.

It is unclear whether the currently exhibited overlay boundaries represent enduring natural river floodplain behaviour or conditions associated with incomplete or constrained drainage infrastructure.

I respectfully submit that established residential land should not be subject to unnecessarily broad or permanent planning constraints where future stormwater or drainage mitigation works may materially alter inundation behaviour and associated flood mapping outcomes.

I also note that the study material recommends regular review of flood mapping, including periodic review and future updates where further information becomes available. This supports my request that the [REDACTED] area be reviewed at a local level before the overlay extent is finalised.

I respectfully request that Council undertake further review of the modelling assumptions applicable to this area, including consideration of the extent to which existing drainage deficiencies and road conditions may be influencing the mapped inundation outcomes.

In particular, I request further consideration of:

- the absence of formal drainage infrastructure within the road reserve;
- whether the road reserve is functioning as an artificial stormwater conveyance channel;
- whether practical drainage or stormwater infrastructure upgrades could materially reduce the mapped inundation extent;
- whether the overlay boundaries appropriately reflect actual flood risk to the established dwelling;
- whether established dwelling envelopes and residential lots should be treated differently within the final overlay mapping;
- whether the modelling has assessed future infrastructure upgrade scenarios as opposed to relying substantially on existing drainage limitations;
- whether more localised assessment is warranted for established residential land situated on the fringe of mapped inundation areas;
- whether the exhibited mapping may overstate risk to established dwellings due to broad-scale catchment modelling assumptions and infrastructure-related flow behaviour.

I respectfully request that Council:

1. Reassess the LSIO2 mapping affecting my property on [REDACTED];
2. Review whether the current overlay extent is materially influenced by deficient public drainage infrastructure;
3. Consider refinement or reduction of the overlay boundary where appropriate;
4. Consider whether the established dwelling envelope should be excluded or differently treated;
5. Undertake further local engineering and drainage review prior to finalising the amendment;
6. Consider whether practical infrastructure mitigation measures should be evaluated

before imposing permanent planning controls over established residential land;

7. Undertake more localised assessment of the established dwelling area on [REDACTED] before finalising the exhibited overlay boundary;
8. Consider whether future drainage or stormwater infrastructure upgrades may materially alter the extent of inundation affecting the area.

I reserve the right to provide additional information, including independent engineering or drainage evidence, should the amendment proceed further.

Kind Regards,

[REDACTED]