

# Council submission



## Melbourne Water's mapping program for its main drainage areas in Merri-bek

November 2025



**Merri-bek City Council acknowledges the Wurundjeri Woi-wurrung people as the Traditional Custodians of the lands and waterways in the area now known as Merri-bek. We pay respect to their Elders, past and present, as well as to all First Nations communities who significantly contribute to the life of the area.**

## Introduction

Council acknowledges Melbourne Water's (MW's) leadership as the regional drainage and floodplain management authority for metropolitan Melbourne. We support MW's work to update its stormwater (flood) map for Merri-bek's main drainage areas and welcome the chance to provide feedback on MW's Mapping Program.

Mapping 1-in-100-year storm events is essential. This information must be clear, shared, and used by the community, councils, and other authorities.

This submission supports MW's work in producing updated stormwater maps for its main drainage areas in Merri-bek and outlines our key asks – which primarily relate to transparency, community engagement, funding commitments, and clarity on how these maps will be maintained. A summary of these asks is in Appendix 1.

## Background

In Merri-bek, MW's 2025 consultation is for its main drainage areas only. Council has separately completed consultation for its separate drainage areas, where it is the local drainage authority.

Council's own mapping was supported by MW and independent experts, with staged community engagement from 2021 to 2025. Figure 1 gives our engagement metrics.

Council's map is now designated under the Building Regulations 2018 and will become part of the Merri-bek Planning Scheme (Planning Scheme) through Amendment C196, as Special Building Overlay Schedule 2 (SBO2). Council adopted C196 in August 2025 and has referred it to the State Government for final approval. Council has given its local catchment mapping data to MW.

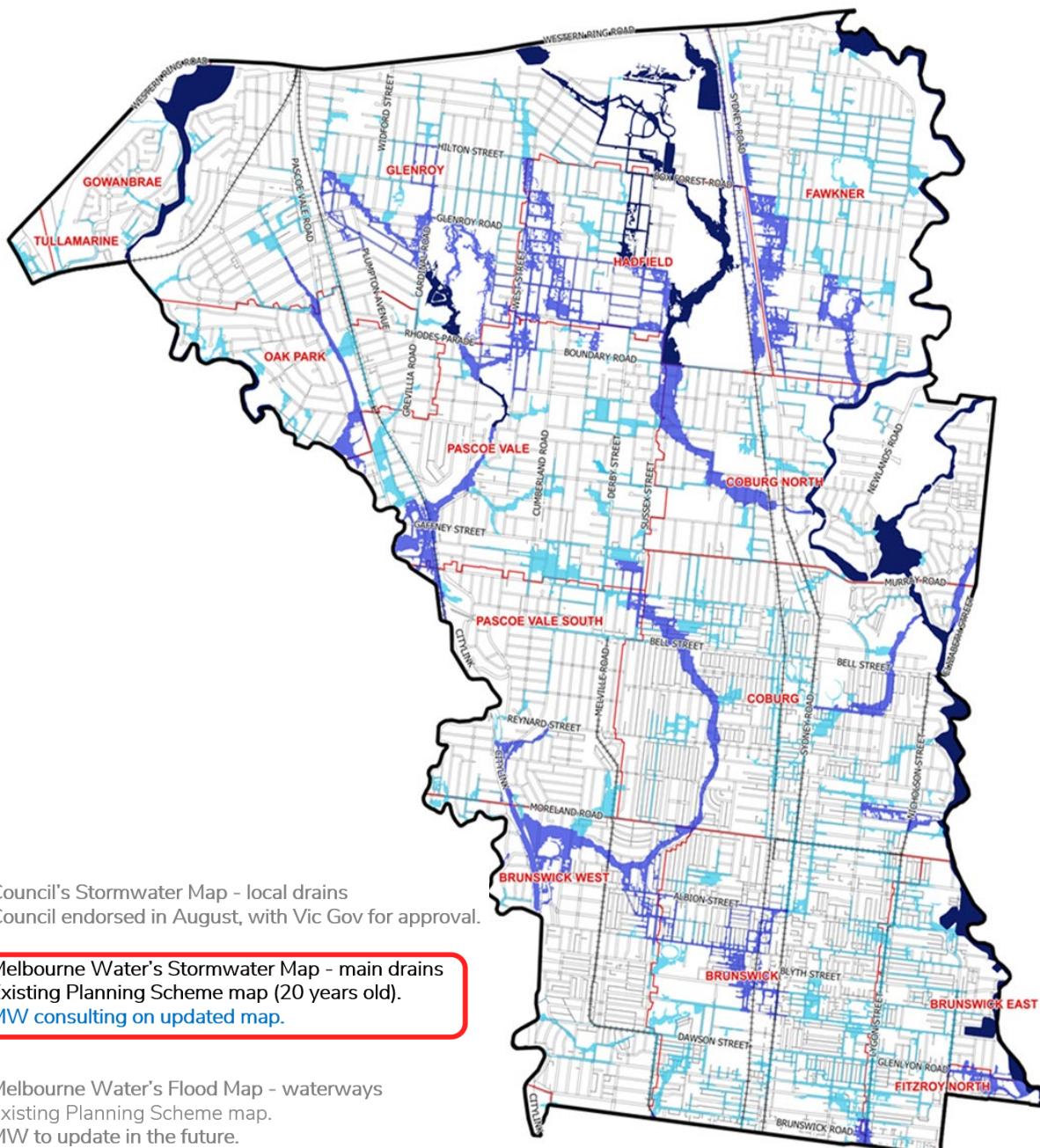
Engagement Activities	
Time spent doing engagement	28 weeks
Letters and brochures sent	42,500
Visits to the council's website	2,500
Information sessions hosted	6
Telephone conversations	350
Face-to-face meetings	80
Email and website contributions	300
Site visits and walking tours	220

**Figure 1: Merri-bek's Engagement Metrics**

Map 1 shows combined Council and MW mapping in Merri-bek. It has three components:

- Council local drainage areas – local drainage mapping completed, adopted via Amendment C196 (SBO2), and now being used for building permits.
- MW main drainage areas – current community consultation ahead of replacing Special Building Overlay Schedule 1 (SBO1), first introduced 20 years ago.
- MW waterway floodplain areas – mapping in the Planning Scheme via a Land Subject to Inundation Overlay, which MW intends to review in the future.

Council also has a Drainage Improvement Plan guiding upgrades to its local drainage network. This plan reduces stormwater flood hazards where the Council is the drainage authority. Council uses this plan to inform its budgeting and capital works program for drainage works to be done.



Map 1: Combined Council and MW Merri-bek Map (excludes current draft MW stormwater map)

## 1. Community consultation

Council's 2025 stormwater map was developed from staged community consultation over several years. Landowners had multiple opportunities to provide map input. We found that affected landowners valued Council's map review process for their nominated locations, especially along map edges where only small parts of properties were affected. In these cases, features like retaining walls or landscaping could only be confirmed through site visits, photographs, or survey plans. This review approach was also supported by an independent Planning Panel in 2025.

We encourage MW to continue working with affected landowners so the 'Year 2100 flooding' map can be checked at nominated locations. Doing this would facilitate improved community awareness for the map version, intended for future statutory use for land development decision-making.

Currently, it appears MW's consultation is geared to the 'Current flooding' map. Whilst we welcome MW's engagement approach, we recommend that all landowner-nominated sites be visited to confirm on-the-ground features that may refine the final 'Year 2100 flooding' map.

During Council's community engagement, we found it useful to release the technical flood study. Doing this helped affected landowners to understand the technical processes and decision-making that informed the map's creation.

### Key asks

#### 1. MW provides a written response that:

- Indicates it will pursue a robust map review process so any affected Merri-bek landowner can have their property checked before the final 'Year 2100 flooding' map is used for land development decision-making.
- Considers publicly releasing any technical flood study report that underpins its 'Year 2100 flooding' map.

## 2. Planning scheme amendment

Council has completed extensive engagement for its local drainage areas, leading to Amendment C196 (SBO2). With this done, we welcome MW's leadership in updating stormwater mapping for its main drainage areas.

On 3 October 2025, the State Government announced a new State-led approach to facilitate planning scheme amendments for MW's flood studies, stating that:

"We'll be working closely with floodplain management authorities and local governments to translate flood risk information into planning controls through a planning scheme amendment process."

Source: [www.planning.vic.gov.au](http://www.planning.vic.gov.au) | [Updating maps and development controls to better manage flood risk](#)

Council supports the Minister for Planning acting as the Planning Authority for MW's program. A Minister-led process, backed by the Flood-related Amendments Standing Advisory Committee, has the potential to enable timely and transparent updates across metropolitan Melbourne.

However, to make this process equitable and inclusive, it should:

- Allow property owners, occupiers, councils, and authorities, to make submissions and present at a public hearing, using powers under section 20(5) of the Act.
- Require the committee's report to be published before the Minister for Planning makes a decision.

#### Key asks

##### 2. MW provides a written response that:

- Acknowledges Council's support for a Minister-led Planning Scheme amendment, with transparent hearings and reporting.
- Allows councils to give input to any drafted Planning Scheme amendment.

## 3. Drainage upgrades

MW's mapping highlights higher hazard areas where land development could be more significantly affected. Council addresses "hot spots" in its own drainage area through a Drainage Improvement Plan. For MW's regional drainage area, we request more information on long-term upgrades to help reduce the mapped hazards. To this end, Council would support MW's advocacy for increased State Government investment in a more significant long-term drainage upgrade program for metropolitan Melbourne.

#### Key asks

##### 3. MW provides a written response that:

- Informs Council of its drainage upgrade program, including locations, timing, and description of 'hazard reduction' works planned over the next 10 years in Merri-bek.
- Advises how it might enhance its drainage upgrade program, to achieve more upgrades for greater 'hazard reduction' at more locations across metropolitan Melbourne.

## 4. Developer contributions

Council seeks transparency on how MW uses development contributions collected from Merri-bek subdivisions. To date, little information has been shared about how these funds support drainage upgrades for hazard reduction in Merri-bek's main drainage areas where MW is the drainage authority.

#### Key asks

##### 4. MW provides a written response that informs how it:

- Allocates development contributions across metropolitan Melbourne.
- Invests collected contributions from Merri-bek subdivisions back into local upgrades.

## 5. Future map reviews

Urban stormwater mapping needs regular updates to reflect changing land levels, guidelines, specifications, and data. MW is best placed to lead and fund this work, with support from the State

Government. Council believes MW and the State Government should fully fund future map reviews for all Merri-bek drainage areas, because:

- MW's floodplain management role covers all catchments in Merri-bek.
- Flood mapping should be the responsibility of the floodplain management authority.
- MW is both the statutory referral authority and the owner of 100-year flood maps, making it the floodplain management decision-maker for development in flood-affected areas.

With government support, MW should deliver and fully fund metropolitan flood mapping. Councils need to focus on their local drainage infrastructure responsibilities.

#### Key asks

5. MW provides a written response for its commitment to a regular map review and planning scheme amendment cycle for all maps, including clarity for:

- Frequency and timing of reviews.
- Funding commitments for future reviews for all Merri-bek catchments.

## 6. Local floodplain development plans

At present, flood risk is usually managed on a site-by-site basis at the planning permit stage, typically by requiring elevated finished floor levels. While this addresses individual applications, it results in a piecemeal approach that does not provide a forward-thinking, precinct-level floodplain management framework to support broader housing growth and development.

Unfortunately, the generic [Guidelines for Development in Flood Affected Areas \(Vic Gov, 2019\)](#) do not give enough place-based clarity for priority housing growth areas (including activity centres), where urban stormwater hazard needs to be carefully resolved for land development. In these areas, MW should lead the preparation of local floodplain development plans in collaboration with the State Government and with councils involved.

#### Key asks

6. MW provides a written response to it:

- Exploring the scope (i.e. business case) of a local floodplain development plan program.
- Advocating for State Government funding to support this program.

## 7. Floodplain development plan for Centres

The State Government is progressing a program to facilitate housing growth in areas close to transport and services. The Brunswick and Coburg Train and Tram Activity Centres, included in this program, are priority growth locations but are also significantly affected by floodplain management implications.

A tailored floodplain development plan would give clear direction for:

- Siting new or extended buildings to resolve any adverse floodplain management concerns, in locations where there are already many existing buildings.

- Any preferred locations and preferred cross-sectional design for basement entries, and their ramps from streets, to manage flood hazards.
- Achieving raised ground floor levels, whilst managing associated implications for building heights, which might otherwise impinge on other planning or building controls for development.
- Exploring the scope of transitional shopfront/commercial spaces to enable easy access between the public realm and raised building floors, in shopping streets and railway station precincts, where there are flood hazards at the public/private realm interface.

#### Key asks

##### 7. MW provides a written response to it:

- Leading the creation of a floodplain development plan for the Brunswick and Coburg Train and Tram Activity Centres.
- If unable to lead for timely progress, provide clarity on how it will apply the State Government floodplain management guidelines for the listed topics in this submission, for managing the flood hazards in these Centres.

## 8. Statutory planning

Council, as the Responsible Authority for the Planning Scheme, regularly works with MW, which is a Referral Authority for considering planning permit applications on flood-affected land. This involves Council receiving applications for proposals affected by a floodplain management control in the Planning Scheme and giving them to MW. MW's decision-making and turnaround times influence Council's ability to issue permits and work constructively with applicants. Council has noticed some issues with:

- Applicants needing to contact MW for clarification.
- Inconsistent MW referral responses.
- MW's appearance at VCAT, when its conditions are challenged.

Council understands the final 'Yr 2100 flooding' map will be added to the Planning Scheme, with new provisions still to come. The map is expected to overlap with other overlays, such as the Heritage Overlay. Protecting heritage significance during development is important, including floors and features that could be affected by flooding. Council asks MW to advise how heritage affects its floodplain assessments, for a balanced approach that's consistent with the Planning and Environment Act 1987 objective to conserve and enhance places of historic interest.

#### Key asks

##### 8. MW provides a written response that explains how it is:

- Improving customer contact for permit applicants.
- Improving consistency of advice to councils and applicants.
- Enabling its participation in VCAT hearings.
- Considering floodplain management implications for heritage places.

## 9. Public open space

Council is a public land manager for the city's open space network. Some of this network is affected by the MW map. Council wants to know how MW's hazard mapping affects its floodplain management input to public works projects that aim to improve the city's open space network.

### Key asks

9. MW provide a written response to explain how its hazard mapping relates to Council's public open space networks, with a focus on intended floodplain management decision-making for public works.

## 10. Government and other authority land

MW's hazard mapping shows that higher hazards exist for the central section of the stormwater overland flow paths within MW's main drainage catchments. Existing land uses in and near these locations may include schools, public housing, and other publicly used buildings.

Council appreciates that MW is sharing its hazard mapping with landowners. Some affected land will be managed by a government department or another authority. More information about 'hazard awareness raising' and the need for new/updated site emergency management planning for these publicly affected properties would be appreciated.

### Key asks

10. MW provide a written response to clarify how its hazard mapping is being shared and discussed with government departments and other authorities, where their land is affected by the map.

## Conclusion

Council supports MW's program and 2025 community engagement. We ask that MW provide a written response to the key asks described in this submission, which are summarised in **Appendix 1**.

## **Appendix 1 – Summary of Key Asks**

## Merri-bek City Council – Summary of Key Asks

Theme	Key Asks
<b>1. Community consultation</b>	MW provides a written response that: <ul style="list-style-type: none"> <li>○ Indicates it will pursue a robust map review process so any affected Merri-bek landowner can have their property checked before the final 'Year 2100 Flooding' map is used for land development decision-making.</li> <li>○ Considers publicly releasing any technical flood study report that underpins its 'Year 2100 Flooding' map.</li> </ul>
<b>2. Planning scheme amendment</b>	MW provides a written response that: <ul style="list-style-type: none"> <li>○ Acknowledges Council's support for a Minister-led planning scheme amendment, with transparent hearings and reporting.</li> <li>○ Allows councils to give input to any drafted planning scheme amendment.</li> </ul>
<b>3. Drainage upgrades</b>	MW provides a written response that: <ul style="list-style-type: none"> <li>○ Informs on its drainage upgrade program, including locations, timing, and description of 'hazard reduction' works over the next 10 years in Merri-bek.</li> <li>○ Advises how it might enhance its drainage upgrade program, to achieve more upgrades for greater 'hazard reduction' at more locations across metropolitan Melbourne.</li> </ul>
<b>4. Developer contributions</b>	MW provides a written response that informs how it: <ul style="list-style-type: none"> <li>○ Allocates development contributions across metropolitan Melbourne.</li> <li>○ Invests collected contributions from Merri-bek subdivisions back into local upgrades.</li> </ul>
<b>5. Future map reviews</b>	MW provides a written response for its commitment to a regular map review and planning scheme amendment cycle for all maps, including clarity for: <ul style="list-style-type: none"> <li>○ Frequency and timing of reviews.</li> <li>○ Funding commitments for future reviews for all Merri-bek catchments.</li> </ul>
<b>6. Local floodplain development plans</b>	MW provides a written response to it: <ul style="list-style-type: none"> <li>○ Exploring the scope (i.e. business case) of a local floodplain development plan program.</li> <li>○ Advocating for State Government funding to support this program.</li> </ul>
<b>7. Floodplain development plan for Centres</b>	MW provides a written response to it: <ul style="list-style-type: none"> <li>○ Leading the creation of a floodplain development plan for the Brunswick and Coburg Train and Tram Activity Centres.</li> <li>○ If unable to lead for timely progress, provide clarity on how it will apply the State Government floodplain management guidelines for the listed topics in this submission, in the Centres.</li> </ul>
<b>8. Statutory planning</b>	MW provides a written response that explains how it is: <ul style="list-style-type: none"> <li>○ Improving customer contact for permit applicants.</li> <li>○ Improving consistency of advice to councils and applicants.</li> <li>○ Enabling its participation in VCAT hearings.</li> <li>○ Considering floodplain management implications for heritage places.</li> </ul>
<b>9. Public open space</b>	MW provide a written response to explain how its hazard mapping relates to Council's public open space networks, with a focus on floodplain management decision-making implications for public works.
<b>10. Government and other authority land</b>	MW provide a written response to clarify how its hazard mapping is being shared and discussed with government departments and other authorities, where their land is affected by the map.