

20 April 2007

Mr Bruce Rush
Flood Management and Drainage Strategy
Melbourne Water
PO Box 4342
MELBOURNE VIC 3001

Dear Mr Rush

**Comments on Discussion Paper
Flood Management and Drainage Strategy**

Thank you for your invitation to comment on the Flood Management and Drainage Strategy Discussion Paper for the Port Phillip and Westernport Region and for arranging the discussion forums to allow stakeholders to actively contribute to this process.

I note that the discussion paper has a bias against the implementation of physical measures to mitigate flooding. Given the inner suburban nature of Boroondara and other areas of pre 1975 urban development, planning and education alone are unlikely to satisfy the community's requirements of reducing flooding to a tolerable level. It is appreciated that the construction of an underground drainage system is expensive and can be compromised by localised blockages in storm events. A program of establishing detention systems and provision of overland flow paths may be a more appropriate mechanism to address the impacts of the lack of a 100 year flow path and the incidence of increasingly intense rainfall. The provision of detention systems may be able to be implemented in conjunction with stormwater harvesting projects that see issues relating to alternative water sources being considered alongside the flood mitigation project to increase the overall benefits of the project.

The availability of funding directed to flood mitigation projects is a barrier to any form of accelerated upgrade program of receiving systems managed by Melbourne Water. The relevant importance of social and financial impacts of flooding is not commensurate with the funding provision when compared to the funding made available for environmental projects. For example, there has been \$600M provided for the Yarra River Action Plan to tackle stormwater pollution, leaking sewers, litter, and agricultural run-off including an additional \$20 million to tackle stormwater pollution, including \$10m specifically allocated to the Lower Yarra. The current annual expenditure on flood mitigation works by Melbourne Water is \$2.5M. From a local government perspective, affected communities are more concerned with the likelihood of future flooding events than litter in the lower Yarra River.

Local governments currently lack the legislative ability to positively control overland flow paths that are protected by drainage easements. This includes the ability to impose fencing restrictions (type and location) where title boundaries intersect a continuous easement.

To assist local governments in protecting drainage assets and flow paths, a legislative prohibition on building over easements created for the purposes of drainage should be considered. Currently local governments have the ability to reject a request to build over an easement, however it is contended that the mere ability for application to build over an easements creates an expectation that this will be allowed.

The positive impact of the effects of on site detention systems on peak flows should be investigated as a planning or building permit requirement triggering a referral to Melbourne Water. While the majority of development where this type of activity will occur is within the drainage system managed by local governments, the ultimate destination of the stormwater will impact on the major drainage system. At source stormwater detention may be the only available opportunity to reduce peak flows in some fully developed catchments.

Further research should be completed to establish the extent of areas liable to flooding and establishing a hierarchy of impact based on what is established as tolerable and intolerable risk. The current assessment of habitable floor flooding as being intolerable would seem appropriate with other flooding tolerable unless there is an identified serious physical or social impact. Flooding areas where there is a safety risk due to water depth, velocity or location (school, child care centre, aged care facility, etc) should be classed as intolerable. This research would then facilitate effective identification of risk areas and allow communication with those affected properties and programming of mitigation works to reduce the intolerable risk.

I look forward to the next phase in development of the Flood Management and Drainage Strategy. Please contact me on 9278 4530 if you require any further information.

Yours sincerely

Steven White
Manager Projects & Strategy