

From: [REDACTED]
To: [REDACTED] [Merrimu PSP \(DTP\)](#)
Cc: [REDACTED]
Subject: [EXTERNAL] Merrimu PSP - Landowner Submission - [REDACTED] - Drainage
[24612E]
Date: Thursday, 9 April 2026 6:26:41 PM
Attachments: [image001.png](#)
[24612E-Merrimu PSP-drainage-submission_April 2026_v0.pdf](#)

Dear [REDACTED] Merrimu PSP team,

LANDOWNER SUBMISSION: Merrimu PSP

[REDACTED]

TITLE DETAILS: [REDACTED]

We refer to the above matter and attach the initial landowner submission on behalf of [REDACTED], which is focused on the stormwater management issues.

Should you have any queries, please contact the undersigned.

Please confirm receipt of this submission.

[REDACTED]

[REDACTED] [REDACTED]



[REDACTED]

[REDACTED]

Our Ref: 24612E

9th April 2026

By email: Merrimu@transport.vic.gov.au

Dear Sir/Madam,

LANDOWNER DRAINAGE SUBMISSION: MERRIMU PRECINCT STRUCTURE PLAN (PSP)

LANDOWNER:

LAND:

We refer to the above matter and write on behalf of the landowner, [REDACTED] in relation to land identified as [REDACTED] within the exhibited draft Merrimu Precinct Structure Plan (PSP). We represent the landowner in relation to the landholding shown in Figure 1 below.

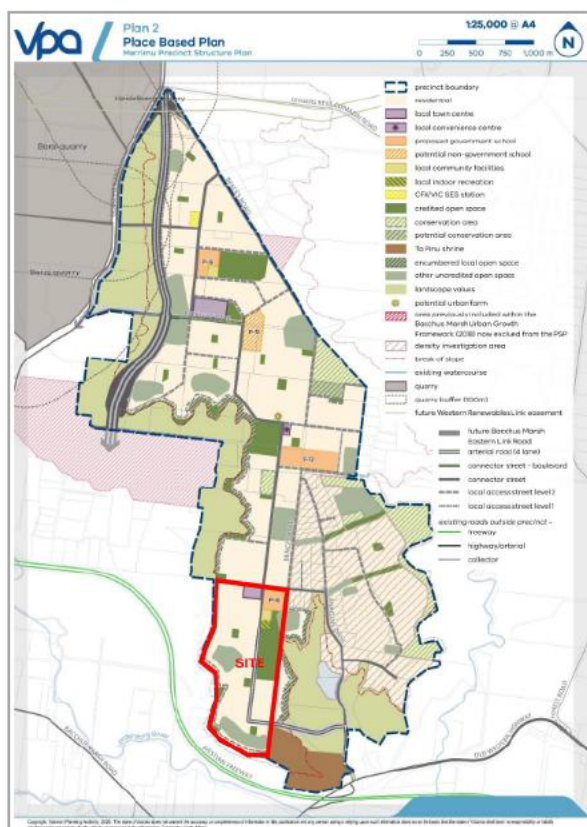


Figure 1: Subject Land within Merrimu PSP

Source: PSP Plan 2 – Place Based Plan (with subject land highlighted)

This submission focuses on drainage-related matters affecting the land. It represents a high-level position based on currently available information, noting that:

Accordingly, this submission is made on the basis of incomplete and evolving information, which materially limits the ability to properly assess the PSP.

Issue 1: PSP is based on outdated drainage strategy and incomplete information**VPA Summary:**

The exhibited draft PSP is based on outdated drainage assumptions and has been released without supporting modelling; it must be updated and re-exhibited once the drainage strategy is finalised.

Position Statement:

The PSP cannot be relied upon in its current form, as it does not reflect the current drainage strategy or supporting technical evidence.

Issue:

The drainage layout shown in PSP Plan 10 is not consistent with Melbourne Water's current drainage strategy. At the landowner workshop held on 1st April 2026, Melbourne Water confirmed that the exhibited PSP relies on superseded assumptions and that a revised drainage scheme is still being prepared.

No supporting drainage reports or modelling for the revised strategy have been exhibited. Landowners are therefore being asked to comment on a drainage outcome that is known to be incomplete and subject to change. In its current form, the PSP does not provide a reliable basis to assess:

- drainage land take and reserve sizing
- outfall strategy and servicing approach
- impact on net developable area (NDA)

Request 1:

VPA and Melbourne Water must release the relevant drainage reports and modelling, update PSP Plan 10 to reflect the current drainage strategy, clearly demonstrate the impact on land take and NDA, and allow landowners an opportunity to review and respond before the Directions Hearing.

Issue 2: Drainage reserves are not justified and are likely oversized**VPA Summary:**

Drainage reserves (including WL-12, WL-13 and WL-14) are based on outdated assumptions and are likely oversized; reserve extents must be reviewed and justified using updated modelling.

Position Statement:

We object to the exhibited drainage reserve areas, which are not supported by current technical justification and materially overstate land take. We request that suitable technical reports and information are provided to review our position.

Issue:

The PSP identifies multiple drainage reserves on the subject land, including WL-12, WL-13 and WL-14. These appear to be based on an earlier infiltration and aquifer recharge approach that is no longer being pursued. As currently shown, there is no clear justification for:

- the size of the reserves
- the number of wetlands proposed
- whether consolidation has been properly considered
- their location within the site

Given the site's topography, these reserves will require significant battering and result in substantial land take, directly impacting development yield.

Request 2:

VPA and Melbourne Water must revise the exhibited drainage reserve areas, provide updated modelling to justify their size and location, reduce the drainage footprint where appropriate, and allow landowners to review and respond prior to the Directions Hearing.

Issue 3: Outfall strategy is unclear and not supported by technical justification**VPA Summary:**

Outfalls (OUT5, OUT8 and OUT9) are not justified and are poorly aligned with topography and the road network; their form and function must be confirmed.

Position Statement:

We object to the exhibited outfall strategy, which is not technically justified and does not represent a coordinated or deliverable drainage solution. We request that suitable technical reports and information are provided to review our position.

Issue:

PSP Plan 13 identifies outfalls OUT5, OUT8 and OUT9, however no technical justification is provided for their alignment or function. While Melbourne Water indicated these may be piped, this is not confirmed in the exhibited PSP. From the exhibited plans, the current layout:

- does not appear to follow natural flow paths
- is not coordinated with the road network (PSP Plan 4)
- does not demonstrate an efficient or logical drainage outcome

This creates unacceptable uncertainty regarding constructability, cost and land take requirements.

Request 3:

VPA and Melbourne Water must provide technical justification for these outfalls, confirm they will be piped (not waterways), define their capacity, revise alignments to integrate with topography and roads, and confirm they are reimbursable.

Issue 4: External catchments are being directed through the site without justification**VPA Summary:**

External catchments are directed through the subject land without justification, resulting in an inequitable drainage burden.

Position Statement:

We object to the current external catchment management as exhibited in the draft PSP due to absence of adequate technical justification for this approach. The current drainage approach which imposes an unjustified and disproportionate servicing burden.

Issue:

The PSP requires the subject land to accommodate flows from upstream properties and support infrastructure servicing external catchments. This does not reflect natural drainage patterns and is not justified.

This approach:

- unfairly allocates drainage burden on this land
- increases land take and reduces development efficiency
- does not demonstrate why alternative upstream solutions are not feasible

Request 4:

VPA and Melbourne Water must clearly justify this approach. Where flows do not naturally drain through the land, they should be managed upstream. Drainage infrastructure should be distributed more equitably across the PSP.

Issue 5: Drainage and road design are not properly coordinated**VPA Summary:**

Drainage outfall infrastructure is not coordinated with the road network, resulting in inefficient, unresolved design and increased cost.

Position Statement:

The PSP does not demonstrate an integrated or coordinated approach between drainage outfalls and road alignments and is not resolved to a deliverable standard. The layout must be revised.

Issue:

The exhibited PSP does not demonstrate a coordinated relationship between trunk drainage infrastructure and the road network. In particular, the alignment of trunk drainage outfalls is not integrated with the Access Street Level 2 or collector street network, which is likely to result in servicing conflicts and delivery constraints.

As shown, the current road layout:

- does not follow natural low points,
- does not use road corridors to convey major flows,
- does not demonstrate that drainage and other services can be accommodated without conflict

This results in inefficient drainage design, increased infrastructure costs, and reliance on oversized pipe systems. Overall, this indicates that the drainage strategy and road layout have not been properly coordinated or resolved. This lack of coordination is illustrated in Figure 2, where the outfall alignments do not correspond with the proposed road network.



Figure 2 - Drainage outfalls OUT5 and OUT6 not aligned with the local road network

Source: Left - PSP Plan 4 (Movement Network), Right – PSP Plan 13 (Infrastructure and Development Staging)

Request 5:

The PSP must be revised to properly integrate drainage and road design. This includes aligning trunk drainage infrastructure with road corridors, coordinating road alignments with natural flow paths, and ensuring that major flows can be conveyed within the road reserves where appropriate.

CONCLUSION

This submission identifies a number of fundamental issues with the exhibited Merrimu PSP, particularly in relation to the drainage strategy, supporting technical information and the allocation of drainage infrastructure across affected landholdings.

For clarity, we object to the drainage layout exhibited in its current form, including the drainage reserve areas, outfall strategy and the routing of external catchments through the subject land. These elements are not sufficiently justified or coordinated and require further refinement.

In its current form, the PSP does not provide a reliable or justified basis for assessing drainage impacts. It is evident that further work is required to align the PSP with Melbourne Water's current drainage strategy and supporting modelling.

The matters raised in this submission are not minor refinements, but go to the fundamental stormwater management principles underpinning the PSP, including impacts on land take, servicing and net developable area.

Notwithstanding the above, we are broadly supportive of the PSP and the outcomes it seeks to achieve. Our intent is not to delay or frustrate the process, but to ensure that the drainage framework is properly resolved, coordinated and supported by appropriate technical evidence prior to finalisation.

We therefore request that the PSP be reviewed and updated to address the issues raised, and that landowners are provided with a further opportunity to review and respond once the drainage strategy has been finalised and properly documented.

This submission represents a preliminary position based on currently available information. [REDACTED] Pty Ltd reserves the right to provide further submissions and supporting technical evidence as additional information becomes available, including through the Standing Advisory Committee process if required.

We welcome the opportunity to continue working with the VPA and Melbourne Water to resolve these matters and achieve a coordinated, efficient and equitable outcome for the Merrimu PSP.

Please contact the undersigned should you wish to discuss any aspect of this submission.

