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23 October 2026

The Hon. Sonya Kilkenny MP
Minister for Planning
Minister for Finance

Flood Resilient Design Guidelines Public Consultation Draft

We welcome the opportunity to provide a joint submission on the draft *Flood Resilient Design Guidelines*.

As design professionals focused on urban design, sustainability, accessibility and inclusion, we support the Victorian Government's efforts to strengthen climate resilience and improve the response to increasing flood risk. We recognise the value of practical guidance that supports safer, more resilient and better designed communities.

Flood resilience should support broader design outcomes

The Guidelines provide valuable guidance on site-level flood response and contain a range of useful strategies relating to landscape design, water sensitive urban design, access arrangements and the integration of level changes.

However, flood adaptation measures should also support broader objectives for accessibility, inclusion, sustainability, urban quality and public realm performance. Climate resilience outcomes should be achieved alongside dignified access, active frontages, well-integrated level changes and high-quality streets and public places.

Implementation and policy integration

We recommend further clarification regarding the role of the Guidelines within the broader planning, regulatory and infrastructure framework.

The relationship between these Guidelines, deemed-to-comply pathways such as the Mid-Rise Code, and existing guidance documents requires greater clarity. Consideration should also be given to whether key urban design objectives require greater weight to support consistent implementation and assessment outcomes.

While the Code addresses matters such as street integration, permeability and stormwater management, these provisions do not necessarily resolve the interface challenges created by flood protection measures. The Guidelines should clarify how outcomes will be assessed where proposals satisfy technical requirements but provide a poor response to the street, public realm or accessibility objectives.

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We also note that successful implementation will require closer alignment with regulatory authorities and infrastructure providers. For larger developments, flood resilience outcomes are often influenced by authority requirements, including those relating to substations, switchboards, fire indicator panels, lift infrastructure, electrical services and other critical building systems. Further guidance regarding these interfaces would assist practitioners in applying the recommendations in practice.

Universal Access and Emergency Resilience

The Guidelines should establish universal design as a core objective and accessibility compliance as the minimum benchmark.

Flood resilient development must work for all Victorians, including older people, people with disabilities and those who rely on lifts, powered mobility devices or assistive technologies. Flood adaptation measures should not create inequitable access arrangements or barriers to independent movement.

Greater consideration should also be given to emergency access, evacuation and continuity of essential building services during flood events, particularly within higher density residential and high-dependency uses.

Public realm and precinct outcomes

While the Guidelines appropriately focus on individual development sites, greater emphasis should be placed on cumulative impacts on streets, centres and neighbourhoods.

Flood protection measures should support active frontages, dignified access and positive pedestrian experiences. Development under flood-resilient provisions should achieve flood protection alongside well-integrated level changes, usable activation spaces and positive relationships with surrounding streets.

The preference for ground-level or podium parking should be accompanied by stronger guidance regarding sleeving and active interfaces to ensure flood adaptation measures do not undermine street quality. Guidance should also distinguish between genuinely usable activation spaces and residual circulation areas that may not meaningfully contribute to street life.

The Guidelines would also benefit from greater consideration of coordinated precinct-scale responses, including shared access arrangements, integrated level transitions and opportunities for adjoining landowners, infrastructure providers and public authorities to work together.

Basements are also likely to remain a common component of development in many urban locations. While dry-proofing approaches are supported, further guidance regarding wet-proofing, recovery planning and post-flood resilience would strengthen the practical application of the document.

Consultation and next steps

Several scenarios and illustrations remain incomplete. We recommend that stakeholders be given an opportunity to review the completed document prior to finalisation.

Recommendations

We respectfully request that the Department:

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1. **Clarify the role of the Guidelines within the broader planning, regulatory and flood adaptation framework**, including their relationship with deemed-to-comply pathways, existing flood-related guidance, authority requirements and infrastructure approval processes.

2. **Strengthen accessibility, inclusion and universal design outcomes throughout the document**, establishing universal design as a core objective and ensuring flood adaptation measures do not create unintended barriers for people with disabilities, older people and others with mobility limitations.

3. **Provide greater guidance regarding emergency access, evacuation and continuity of essential building services during flood events**, including consideration of lift operation, backup power, shelter-in-place strategies and the needs of high-dependency building uses.

4. **Strengthen guidance relating to public realm quality, activation and street interface outcomes**, ensuring flood protection measures support dignified access, active frontages, usable activation spaces, integrated level transitions and positive pedestrian experiences.

5. **Expand consideration of precinct-scale adaptation and coordinated responses**, including integration with public infrastructure, emergency management planning, existing building stock and opportunities for adjoining developments and public authorities to work together.

6. **Provide a further opportunity for stakeholder review once all scenarios and supporting illustrations are complete**, ensuring the final document can be comprehensively assessed prior to adoption.

Delivering resilient and inclusive places

The challenge of adapting Victoria's built environment to increasing flood risk presents a significant opportunity. With further refinement, these guidelines can support development that is safer, more resilient, more accessible and more positively integrated into the public realm.

We look forward to continued engagement with the Department as the guidelines progress.



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Forum

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Appendix A

Technical Matters and Recommended Guidance

This appendix records technical matters identified through review of the draft *Flood Resilient Design Guidelines* by the Victorian Enabling Architecture Committee (VEAC), Urban Design Forum Australia (UDF) and Sustainable Architecture Committee (SAC).

The recommendations below are intended to support refinement of the final Guidelines and improve the integration of flood resilience, accessibility, sustainability and urban design outcomes.

A1. Strategic Context and Scope (VEAC)

Matter

VEAC notes that it is not entirely clear how the Guidelines fit within the broader framework of flood adaptation or support a comprehensive response to flooding, including:

- projected sea level rise;
- storm-driven surge;
- overland inundation;
- permanent flooding impacts; and
- temporary flooding impacts.

Further clarity is sought regarding how policy intends to address public realm outcomes.

VEAC also notes that the focus on buildings between four and six storeys and above leaves a range of building types outside the scope of the document, including:

- existing buildings;
- new single dwellings;
- townhouse developments; and
- buildings in areas subject to significant flood risk.

Reference is made to the *Guidelines for Development in Flood Affected Areas (2026)*, however VEAC notes that this document does not appear to address broader precinct-scale remedies for existing housing stock or other excluded building categories.

VEAC also notes that examples from the United Kingdom, Ireland and the Netherlands demonstrate a broader range of adaptation responses beyond solely raising ground floor levels.

A2. General Accessibility Considerations

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VEAC notes that increasing numbers of people with disabilities are living within multi-level accommodation.

Many residents rely on:

- lifts;
- wheelchair charging infrastructure;
- hoists; and
- other powered assistive technologies.

People who use wheelchairs cannot independently utilise alternative means of egress such as fire escape stairs.

VEAC considers that the requirements of people with disabilities should be addressed as a fundamental consideration throughout the Guidelines.

VEAC also recommends reconsideration of the term "vulnerable users" throughout the document and suggests:

- use of people-first language;
- reference to specific user groups, including people with disabilities and people who use wheelchairs; or
- reference to specific risk factors.

A3. Section 1.1

VEAC questions why the Guidelines are limited to mid-rise and high-rise development.

The Committee notes that:

- accessibility issues arise across all building typologies;
- insurance and cost implications are not limited to larger developments; and
- accessibility challenges may be greater on smaller sites where lot dimensions are constrained.

VEAC notes that the purpose statement implies consideration of access and egress between street level, building entries and internal building environments.

A4. Section 2.2

VEAC seeks clarification regarding assumptions around how people with disabilities and older people will access or leave properties where surrounding land remains below the nominated flood level.

Questions are raised regarding:

- disaster planning;

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- public infrastructure planning; and
- coordination with local government and emergency authorities.

VEAC notes concern regarding guidance suggesting that 300mm of water may represent a safe depth where vulnerable users are present, observing that this depth may not be safe for wheelchair users.

VEAC also seeks further guidance regarding evacuation and sheltering requirements where:

- flooding may reach 600mm depth;
- lifts may be unavailable; and
- power supplies may be interrupted.

The Committee notes that loss of power may create significant issues for occupants who rely on:

- wheelchair charging;
- hoists;
- automatic doors;
- lighting controls; and
- other assistive technologies.

A5. Section 3.2

VEAC supports the recommendation to locate services above the nominated flood planning level.

The Committee notes the importance of maintaining:

- lift operation;
- lighting;
- power supplies; and
- accessibility-related services.

VEAC suggests consideration of:

- backup generators;
- emergency power provisions; and
- increased duration of emergency lighting systems.

A6. Section 3.3

Section 3.3.2

VEAC recommends that where pathways are located adjacent to steps or level changes, appropriate kerbs or barriers should be provided to reduce the risk of wheelchair users travelling beyond the pathway edge.

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Section 3.3.6

VEAC notes that permeable surfaces should remain suitable for use by:

- wheelchair users; and
- ambulant people with disabilities.

The Committee recommends consideration of accessibility requirements contained within AS 1428.1.

A7. Section 4.1

VEAC recommends inclusion of:

- AS 1428.1; and
- the Disability (Access to Premises - Buildings) Standards

within the list of relevant requirements.

The Committee also notes:

- preferred terminology changes relating to mobility impairment;
- concerns regarding examples that involve complex level changes;
- concerns regarding open stair risers;
- the importance of lift reliability;
- consideration of backup power for lifts; and
- consideration of stair widths and handrails to support assisted movement during emergency evacuation.

A8. Section 4.2

VEAC notes that several examples encourage split-level arrangements within:

- cafés;
- hotel foyers;
- retail environments; and
- tenancy layouts.

The Committee observes that these arrangements may reduce accessibility and could create barriers for employees, residents, visitors or customers with disabilities.

Particular concern is raised regarding:

- split-level internal arrangements;
- communal platform lift solutions; and
- stair-based tenancy entries.

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VEAC also notes concerns regarding Photo 4.2g and recommends consideration of imagery that more clearly demonstrates accessible design outcomes.

A9. Sections 4.5, 4.6 and 4.7

Section 4.5

VEAC reiterates comments regarding:

- lift operation;
- emergency power; and
- provision of power within dwellings.

Section 4.6

VEAC notes that operable components such as windows and cabinetry should remain within accessible reach ranges.

Section 4.7

VEAC recommends that guidance relating to temporary flood barriers should explicitly consider accessibility and safe access for people with disabilities.

A10. Illustrations and Scenarios

VEAC notes that a number of sectional diagrams and illustrations do not visibly demonstrate accessible elements including:

- ramps;
- handrail details; and
- other accessibility measures.

The Committee recommends that future diagrams clearly illustrate equitable access outcomes.

VEAC also notes that the following scenarios remain unavailable for review:

- Scenario 6 - Tall Apartment;
- Scenario 7 - Tall Residential Hotel;
- Scenario 8 - Mid-Rise Residential Aged Care;
- Scenario 9 - Mid-Rise Primary School;
- Scenario 11 - Taller Office Building; and
- Scenario 12 - Taller Office Building.

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VEAC considers further review of these scenarios important due to the accessibility implications associated with these building types.

A11. Glossary

Permeable Surfaces

VEAC notes that some examples included within the proposed definition may not provide accessible pathways for wheelchair users.

Examples identified include:

- gravel;
- grassed areas;
- garden areas; and
- widely spaced paving systems.

Vulnerable People

VEAC recommends review of the proposed definition and terminology.

The Committee notes that language such as "vulnerable" and "infirm" is not preferred and recommends the use of people-first language and more specific descriptions of affected user groups.

A12. Images

VEAC notes that several images appear to depict environments that may not satisfy contemporary accessibility expectations.

Examples cited include:

- stair-only access arrangements;
- stairs without handrails; and
- stairs without compliant nosings.

The Committee recommends consideration of alternative imagery that better demonstrates accessible and inclusive design outcomes.

A13. Urban Design and Public Realm Outcomes (UDF)

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Implementation of Urban Design Objectives

UDF notes that the Guidelines do not affect deemed-to-comply pathways such as the Mid-Rise Code. This may create circumstances where proposals satisfy prescribed standards while delivering poor urban design outcomes.

Particular consideration should be given to:

- how urban design outcomes will be assessed where flood protection measures affect the street interface;
- whether selected objectives should carry greater weight within assessment processes;
- the relationship between the Guidelines and the *Good Design Guide for Buildings in Flood Affected Areas in Fishermans Bend, Arden and Macaulay*; and
- monitoring the quality of built outcomes arising from implementation of the Guidelines.

Public Realm and Activation

UDF supports the intent of the Guidelines but considers stronger guidance is required regarding:

- dignified access;
- active frontages;
- integration of level changes;
- usable activation spaces; and
- positive street interfaces.

The distinction between active frontage outcomes and residual circulation space should be more clearly articulated.

Parking Interfaces

Where ground-level or podium parking is preferred over basement parking, stronger guidance should be provided regarding:

- sleeving of parking areas;
- treatment of public-facing edges;
- pedestrian laneways; and
- activation of street frontages.

Where sleeving is considered impractical, proponents should demonstrate that alternative approaches have been explored and that a positive public realm outcome can still be achieved.

Precinct-Scale Response

UDF notes that the Guidelines predominantly focus on individual sites.

Further consideration could be given to:

- shared access arrangements;
- coordinated level transitions;
- interface conditions between adjoining properties; and

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- opportunities for coordinated public realm outcomes across multiple sites.

A14. Building Services, Infrastructure and Authority Requirements (SAC)

SAC supports the inclusion of guidance relating to landscape design, water sensitive urban design, services and integration of levels.

However, SAC notes that the treatment of building services and infrastructure is currently limited in scope relative to the scale and complexity of most mid-rise and larger developments.

Critical Building Infrastructure

Further consideration is recommended regarding:

- substations;
- switchboards;
- fire indicator panels;
- lift pits;
- communications infrastructure;
- mechanical plant; and
- other critical building systems.

The examples currently provided focus largely on smaller-scale services and do not reflect the infrastructure requirements typically associated with larger residential or mixed-use developments.

Coordination with Authorities

Flood resilience outcomes for larger developments are often heavily influenced by authority requirements and approval processes.

SAC notes the importance of considering:

- utility provider requirements;
- emergency services requirements;
- infrastructure authority requirements;
- National Construction Code requirements; and
- interactions between potentially competing regulatory obligations.

Additional guidance regarding these interfaces would assist practitioners in applying the Guidelines in practice.

A15. Basement Design, Recovery and Resilience (SAC)

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SAC supports the use of dry-proofing approaches where appropriate but notes that basements remain highly susceptible to flooding during extreme events.

Additional consideration could be given to:

- wet-proofing strategies;
- recoverability and reinstatement following flood events;
- protection of building services within basement environments;
- post-flood clean-up requirements; and
- design measures that support rapid reoccupation and recovery.

The document would benefit from greater discussion of resilience and recovery where inundation occurs despite preventative measures.