

Submission Template

Chapter 2: Growth, challenges, fundamental principles and key concepts

1. The discussion paper includes the option (option 5, page 16) that Plan Melbourne better define the key opportunities and challenges for developing Melbourne and outlines some key points for considerations in Box 1. *Are there any other opportunities or challenges that we should be aware of?*

(1) Infrastructure affordability. An economic model needs to be in place to ascertain the cost of infrastructure to the state vs revenue to the state for the current population growth rate. This needs to be then made explicit to the public. There is research which suggests that the cost of infrastructure (including retrofitting) to Melbourne at current rate of population growth exceeds the economic gains of current population growth. There is sufficient evidence to suggest that the state government will be unable to afford many of the infrastructure recommendations of the plan refresh. Additionally, the costs of infrastructure are certain to rise in the upcoming decades with increasing scarcity of finite resources.

(2) Population Growth. There is no mention in the refresh of why Melbourne is growing at ~ 100 000 per year, the push and pull factors involved, and the role of the Victorian State Government in influencing these factors. Population growth in Victoria is presented by the plan as mostly inevitable and given. The Productivity Commission however presents population growth as in large part generated through deliberate federal policies towards generating GDP growth. In recent years, this has been through the skilled migration channels at an expense of the humanitarian program. The Victorian state's capacity to lobby the government on politically engineered population growth must be made publically explicit, in addition to the state's contribution towards assisting politically engineered population growth. E.G. <http://www.liveinvictoria.vic.gov.au/> is an example of The Victorian Government actively promoting population growth into the state. The issue of the rate of Population growth should be democratic, with citizens actively involved in ascertaining deliberate population growth policies, both at state and federal levels.

(3) Regional development. The Productivity Commission has outlined problems for regional centres in retaining migrants increases in population due to difficulties in infrastructure and provision of employment and social services. The plan could be more specific as to how infrastructure and employment will be provided to regional centres to absorb population growth, and how this will be costed.

(4) The traditional custodians of the lands now occupied by Melbourne should be proactively invited to be involved in discussions as to the population and development policies in Melbourne, as they remain invested as caretakers for lands that we continue to occupy and develop. They may have specific views on population and development goals that should be carefully considered and adhered to.

(5) Decoupling town planning decisions from vested interest parties such as property developers and back into the community. This is particularly relevant as a recent Bill from the Greens to stop

donations from property developers in Victoria was recently turned down by the current Labor government. Whilst these vested interests continue to influence town planning decisions, it is unlikely that many of the ideas in Plan Melbourne will be properly implemented. Could the plan outline any recommendations on how this could be achieved?

2. The discussion paper includes the option (option 6, page 18) that the United Nations Sustainable Development Goals be included in Plan Melbourne 2016. Do you agree with this idea? If so, how should the goals be incorporated into Plan Melbourne 2016? Choose one option:

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

Please explain your response:

Anything that holds the Victorian State government accountable to environmental sustainability goals is welcome, as this is an area that has become increasingly problematic. That been said, it will be difficult to achieve sustainable environmental goals if the population continues to grow, even if per capita pollution were to go down. Therefore, an end point needs to be actively discussed (as Melbourne population growth will continue beyond 8 million if discussion on the matter is not actively facilitated).

3. The discussion paper includes the option (option 7, page 18) to lock down the existing urban growth boundary and modify the action (i.e. the action under Initiative 6.1.1.1 in Plan Melbourne 2014) to reflect this. Do you agree that there should be a permanent urban growth boundary based on the existing boundary? Choose one option:

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

Please explain your response:

The growth boundary should not be expanded further, however the growth boundary should be pulled back generally to:

- A) preserve our bordering market garden agricultural land
B) to discourage suburban sprawl along areas that do not have ready access to public transport such as train lines, as this will only increase car dependency into the future. Independently resourced regional centres along train routes that have easy access to Melbourne seems more logical if expansion is necessary. However, SPA recommends that population stabilization is the most effective way to preserve green boundaries. This can be achieved by ceasing politically engineered population growth policies to increase GDP growth, without having to affect natural increase and the humanitarian intake program.

4. The discussion paper includes the option (option 8, page 18) that Plan Melbourne 2016 should more clearly articulate the values of green wedge and peri-urban areas to be protected and safeguarded. How can Plan Melbourne 2016 better articulate the values of green wedge and peri-urban areas?

I believe the general community is cautious with any legislation regarding Green Wedges, as

successive city plans have been modified with the Green Wedges boundary continually expanded. A succinct legal framework as to how future governments will be held to account the safeguarding of green wedges legislation will be needed to be succinctly presented to the community in order to gain confidence.

It is hard to envision the Green Wedges boundary as it stands to be preserved indefinitely whilst population also rises indefinitely, especially with current pull factors to Melbourne and as population retention in regional centres remains problematic.

5. **The discussion paper includes the option (option 9, page 18) to remove the concept of an Integrated Economic Triangle and replace it with a high-level 2050 concept map for Melbourne (i.e. a map that shows the Expanded Central City, National Employment Clusters, Metropolitan Activity Centres, State-Significant Industrial Precincts, Transport Gateways, Health and Education Precincts and Urban Renewal Precincts). What elements should be included in a 2050 concept map for Melbourne?**

Parks and open space and proposed areas of open space to meet the needs of the residents.

6. **The discussion paper includes the option (option 10, page 18) that the concept of Melbourne as a polycentric city (i.e. a city with many centres) with 20-minute neighbourhoods (i.e. the ability to meet your everyday (non-work) needs locally, primarily within a 20-minute walk) be better defined. Do the definitions adequately clarify the concepts? Choose one option:**

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

Please explain your response:

The polycentric approach and 20 minutes neighbourhood are great ideas that are not currently realized. Much of the recent suburban sprawl, e.g. In Wyndam and Casey are serviced mainly by shopping centres and franchises that lack diversity, which means that residents are still being drawn towards the inner city areas for many essential services. Even central areas are struggling, e.g. The Docklands community is fighting for a primary school. So, not only do we need to vastly improve already existing centres, we also need these to keep up with a population growth per annum of 100,000 without resorting to ad hoc development which is currently the norm. A smaller or steady population growth rate would make this transition easier.

7. **The discussion paper includes options (options 11-17, pages 23 to 27) that identify housing, climate change, people place and identity and partnerships with local government as key concepts that need to be incorporated into Plan Melbourne 2016. Do you support the inclusion of these as key concepts in Plan Melbourne 2016?**

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

Please explain your response:

Strongly agree as these are all aspects that are impacted by population growth in conjunction with

unsound town planning decisions. Particularly point (16) in the refresh including Aboriginal values and perspectives. See box 1 for my perspective on aboriginal people being more actively invited in discussions involving Melbourne town planning decisions.

8. Any other comments about chapter 2 (growth, challenges, fundamental principles and key concepts)?

N/a

Chapter 3: Delivering jobs and investment

9. The discussion paper includes the option (option 20, page 30) to revise the Delivering Jobs and Investment chapter in Plan Melbourne 2014 to ensure the significance and roles of the National Employment Clusters as places of innovation and knowledge-based employment are clear. How can Plan Melbourne 2016 better articulate the significance and roles of the National Employment Clusters as places of innovation and knowledge-based employment?

A few areas of concern or need for further clarification:

- 1) Employment clusters will be more effective if there are efficient transport links between them as opposed to radial links from the CBD.
- 2) There needs to be careful planning as how job opportunities may keep up with population growth over the coming decades, at a time where the manufacturing industries are affected and most growth currently revolve around construction, property speculation and tertiary services.
- 3) Long term employment and training options are becoming increasingly difficult, particularly for the young job seeking demographic as tertiary training (e.g. TAFE) is being downsized and increasing number of job opportunities in the construction sector are taken by temporary contracts, often on temporary 457 visas. This affects job prospects for permanent residents, including permanent skilled migrants.
- 4) Points 2 and 3 are worth considering in order for any plan for employment clusters to be an effective investment long term.

10. The discussion paper includes two options (page 30) relating to National Employment Clusters, being:

Option 21A: Focus planning for National Employment Clusters on core institutions and businesses

Option 21B: Take a broader approach to planning for National Employment Clusters that looks beyond the core institutions and businesses

Which option do you prefer?

Option 21A

Option 21B

Please explain why you have chosen your preferred option:

N/a

11. The discussion paper includes the option (option 22, page 30) to broaden the East Werribee National Employment Cluster to call it the Werribee National Employment Cluster in order to encompass the full range of activities and employment activities that make up Werribee. This could include the Werribee Activity Centre and the Werribee Park Tourism Precinct. Do you agree with broadening the East Werribee Cluster? Choose one option:

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

N/a

12. The discussion paper includes the option (option 23, page 30) to broaden the Dandenong South National Employment Cluster to call it the Dandenong National Employment Cluster in order to encompass the full range of activities and employment activities that make up Dandenong. This could include the Dandenong Metropolitan Activity Centre and Chisholm Institute of TAFE. Do you agree with broadening the Dandenong South National Employment Cluster? Choose one option:

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

N/a

13. The discussion paper includes options (options 24 to 30, pages 33 and 34) that consider the designation of activity centres and criteria for new activity centres. Do you have any comments on the designation of activity centres or the criteria for new activity centres as outlined in the discussion paper?

In addition to the activity centres and services mentioned I would recommend a neighbourhood house and a community garden (e.g. Like Ceres) in every suburb. These prove to be essential hubs for bringing the community together and sharing essential skills. In my experience, community gardens are essential contributors to local community cohesion, sustainability and resilience.

14. The discussion paper includes the option (option 31, page 35) to evaluate the range of planning mechanisms available to protect strategic agricultural land. What types of agricultural land and agricultural activities need to be protected and how could the planning system better protect them?

All productive agricultural land close to the city is valuable and should be preserved to enable easy access to fresh produce with minimal food miles. Under the current population growth policies, fertile farmland near the cities is being lost. Many of our market gardens were run by previous or current generations of migrants so our current population policy is ironically doing a disservice to this sector of the community.

15. The discussion paper includes the option (option 32, page 36) to implement the outcomes of the Extractive Industries Taskforce through the planning scheme, including Regional Growth Plans, to affirm that extractive industries resources are protected to provide an economic supply of materials for construction and road industries. Do you have any comments in relation to extractive industries?

See Box 1 for concerns regarding provision of infrastructure to regional areas.

16. Any other comments about chapter 3 (delivering jobs and investment)?

There is evidence that the current rate of population growth in Melbourne is exceeding job availability, as ascertained by increasing unemployment figures and abandonment over the past decade of key manufacturing industries (e.g. Automobile). Our interpretation of the recent Productivity Commission draft report into skilled migration is that annual intake exceeds job availabilities, and at the expense of funding tertiary education facilitated (such as polytechnics and TAFE). This provides ongoing challenges with providing job opportunities into the future for all sectors of the community, including current residents, migrants through the humanitarian program, and indeed, permanent skilled migrants.

The “Live in Victoria” website is actively promoting the Significant Investment Visa stream. However, research from the Productivity Commission indicates that this has negligible affect on GDP or societal development so this should not be further promoted by the Victorian Government.

Chapter 4: A more connected Melbourne

17. The discussion paper includes the option (option 34, page 42) to include the Principal Public Transport Network in Plan Melbourne 2016. Do you agree that the Principal Public Transport Network should inform land use choices and decisions? Choose one option:

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

We need to ensure that we do not displace too many services with housing accommodation. In other words the emphasis needs to be as much on improving destinations on the public transport network as providing origins.

18. The discussion paper includes the option (option 35, page 43) to incorporate references to Active Transport Victoria (which aims to increase participation and safety among cyclists and pedestrians) in Plan Melbourne 2016. How should walking and cycling networks influence and integrate with land use?

Much more needs to be done to encourage people to cycle and walk in Melbourne and to reduce car use. While per- capita car use has reduced, congestion will continue to increase due to population growth.

There has been an increase in motor vehicle accidents, including injuries and deaths to cyclists. Whilst this is often attributed to careless driving, we believe density and congestion of traffic plays a more significant factor. When multi-use roads become increasingly congested, there is a decrease in the margin of error available to drivers before accidents occur. This will only increase where population growth in Victoria continues to be Melbourne based and where road infrastructure cannot keep up with population growth.

19. Any other comments about chapter 4 (a more connected Melbourne)?

n/a

Chapter 5: Housing

20. The discussion paper includes the option (option 36A, page 46) to establish a 70/30 target where established areas provide 70 per cent of Melbourne's new housing supply and greenfield growth areas provide 30 per cent. Do you agree with establishing a 70/30 target for housing supply? Choose one option:

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

Not at current rate of population growth, as the reality is that any compartmentalization of housing targets will be very difficult to manage, with both suburban sprawl, high rise, and brownfield sites all expanding rapidly. To put into perspective, Fishermen's Bend, a brownfield site that took years to plan, will absorb less than one year's worth of Melbourne's population growth. Greenfield growth needs to be less than 30 percent if we want to preserve our food bowl and native wildlife.

21. What, if any, planning reforms are necessary to achieve a 70/30 target?

- 1) A state-wide stable population target medium term until effective town planning policies are in place to ensure carefully planned and modest future growth can be affected. This will include state lobbying of federal population targets and abolishing state-based population growth promotion or incentives.
- 2) Housing decisions must be decoupled from vested interested parties with strong lobbying power (e.g. Property developers) and returned to local communities and local councils (ideally with a sustainable town planner in every LGA). This needs to be carried through state legislative reforms. Otherwise the pattern of housing will be determined by investment and profit returns, rather than what is best for local communities.

These planning reforms suggested are consistent with the remainder of the chapter 5 answers.

22. The discussion paper includes the option (option 36B, page 46) to investigate a mechanism to manage the sequence and density of the remaining Precinct Structure Plans based on land supply needs. Do you agree with this idea? Choose one option:

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

See above for main points.

23. The discussion paper includes the option (option 36C, page 46) to focus metropolitan planning on unlocking housing supply in established areas, particularly within areas specifically targeted for growth and intensification. Do you agree with this idea? Choose one option:

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

See above

24. The discussion paper includes options (option 37, page 50) to better define and communicate Melbourne's housing needs by either:

Option 37A: Setting housing targets for metropolitan Melbourne and each sub-region relating to housing diversity, supply and affordability.

Option 37B: Developing a metropolitan Housing Strategy that includes a Housing Plan.

Which option do you prefer? Choose one option:

- Option 37A
- Option 37B
- Other

Why?

25. The discussion paper includes the option (option 38, page 52) to introduce a policy statement in Plan Melbourne 2016 to support population and housing growth in defined locations and acknowledge that some areas within defined locations will require planning protection based on their valued character. How could Plan Melbourne 2016 clarify those locations in which higher scales of change are supported?

As above mentioned, this will require a decoupling of state town planning from vested interests, a restructure of (for example) VCAT, and town planning decisions made more democratic via LGA councils.

26. The discussion paper includes the option (option 39, page 52) to clarify the direction to 'protect the suburbs'. How could Plan Melbourne 2016 clarify the direction to protect Melbourne and its suburbs from inappropriate development?

As above.

27. The discussion paper includes the option (option 40, page 56) to clarify the action to apply the Neighbourhood Residential Zone to at least 50 per cent of residential land by:

Option 40A: Deleting the action and replacing it with a direction that clarifies how the residential zones should be applied to respect valued character and deliver housing diversity.

Option 40B: Retain at least 50 per cent as a guide but expand the criteria to enable variations between municipalities.

Which option do you prefer? Choose one option:

- Option 40A
- Option 40B
- Other

Why?

28. The discussion paper includes the option (option 42, page 58) to include an action in Plan Melbourne 2016 to investigate how the building and planning system can facilitate housing that readily adapts to the changing needs of households over the life of a dwelling. *In what other ways can Plan Melbourne 2016 support greater housing diversity?*

We recommend a greater investment and research into eco-house designs so that households are more self-sufficient, carbon neutral and resilient into the future with increasing temperature extremes and scarcity of resources. Most current high rise and suburban home designs are built to meet short-term investment goals rather than long term livability and resilience. This is occurring in a housing climate that promotes property speculation and negative gearing alongside high population growth.

29. A number of options are outlined in the discussion paper (page 58) to improve housing affordability, including:

Option 45A: Consider introducing planning tools that mandate or facilitate or provide incentives to increase social and affordable housing supply.

Option 45B: Evaluate the affordable housing initiative pilot for land sold by government to determine whether to extend this to other suitable land sold by government.

Option 45C: Identify planning scheme requirements that could be waived or reduced without compromising the amenity of social and affordable housing or neighbouring properties.

What other ideas do you have for how Plan Melbourne 2016 can improve housing affordability?

The current population growth of Melbourne (around 100 000 per annum) ensures that housing demand will always exceed supply of new or existing housing. This operates within an economic climate that promotes tax concessions on property acquisitions and rising land prices for profiteering purposes for those with land capital. From here, housing can only become more unaffordable into the medium term until a housing bubble/crash occurs. To avoid this, housing supply needs to exceed population growth and the economy needs to steer away from tax breaks on property and property speculation.

30. Any other comments about chapter 5 (housing)?

Chapter 6: A more resilient and environmentally sustainable Melbourne

31. The discussion paper includes the option (option 46, page 69) to introduce Strategic Environmental Principles in Plan Melbourne 2016 to guide implementation of environment, climate change and water initiatives. Do you agree with the inclusion of Strategic Environmental Principles in Plan Melbourne 2016? Choose one option:

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

Why?

32. The discussion paper includes the option (option 47, page 72) to review policy and hazard management planning tools (such as overlays) to ensure the planning system responds to climate change challenges. Do you agree with this idea? Choose one option:

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

Why?

33. The discussion paper includes options (options 48 and 49, page 72) to update hazard mapping to promote resilience and avoid unacceptable risk, and update periodically the planning system and supporting legislative and policy frameworks to reflect best available climate change science and data. Do you have any comments on these options?

Models needs to include the population carrying capacity in climate change scenarios with reduced rainfall and associated loss of arable land and water supply.
Homes and communities need to be carefully planned to be structurally resilient and more self-sustainable, with less reliance on motor vehicle travel, food miles, with water tanks, solar panels, community gardens etc.
A significant portion of per capita emissions in Melbourne arise from town planning design and the patterns of resource use that are pre-determined. To transition towards more eco-friendly homes and communities, careful town planning legislation is required that is difficult to achieve with a state population growth rate of around 100 000 per annum.

34. The discussion paper includes the option (option 50, page 73) to incorporate natural hazard management criteria into Victorian planning schemes to improve planning in areas exposed to climate change and environmental risks. Do you agree with this idea? Choose one option:

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

As above

35. The discussion paper includes the option (option 51, page 75) to investigate consideration of climate change risks in infrastructure planning in the land use planning system, including consideration of an 'infrastructure resilience test'. Do you agree that a more structured approach to consideration of climate change risks in infrastructure planning has merit? Choose one option:

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

As above

36. The discussion paper includes the option (option 52, page 76) to strengthen high-priority habitat corridors throughout Melbourne and its peri-urban areas to improve long-term health of key flora and fauna habitat. Do you agree with this idea? Choose one option:

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

Very high priority from the perspective of SPA where we have ongoing concerns regarding our coastal and urban fringe wildlife as our cities expand, especially Melbourne.

Wildlife corridors are essential for ensuring that Melbourne's wildlife habitat does not become even more fragmented. Wildlife corridors also provide microclimates and passive recreation for residents. Local people can also connect more to their community by helping to regenerate and plant them. These cannot be achieved with ad hoc town planning that struggles to keep up with current population growth patterns.

- 37. The discussion paper includes options (options 53 and 54, pages 78 and 79) to introduce strategies to cool our city including: increasing tree canopy, vegetated ground cover and permeable surfaces; use of Water Sensitive Urban Design and irrigation; and encouraging the uptake of green roofs, facades and walls, as appropriate materials used for pavements and buildings with low heat-absorption properties. *What other strategies could be beneficial for cooling our built environment?***

The approval of high rise apartments needs to be slowed. Currently, there is a tendency to replace existing dwellings with high rise pre-fab concrete apartments with the removal of most of the existing vegetation. Areas such as the CBD are generally warmer than in suburbs with existing greenery. In order to meet the objective listed above, the design of high rise building needs to be completely re-examined if it is to be built at all to accommodate population growth.

- 38. The discussion paper includes the option (option 56A, page 80) to investigate opportunities in the land use planning system, such as strong supporting planning policy, to facilitate the increased uptake of renewable and low-emission energy in Melbourne and its peri-urban areas. *Do you agree that stronger land use planning policies are needed to facilitate the uptake of renewable and low-emission energy? Choose one option:***

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

Why?

- 39. The discussion paper includes options (options 56B and 56C, page 80) to strengthen the structure planning process to facilitate future renewable and low-emission energy generation technologies in greenfield and urban renewal precincts and require consideration of the costs and benefits of renewable or low-emission energy options across a precinct. *Do you agree that the structure planning process should facilitate the uptake of renewable and low-emission technologies in greenfield and urban renewal precincts? Choose one option:***

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

Why?

- 40. The discussion paper includes the option (option 57, page 81) to take an integrated approach to planning and building to strengthen Environmentally Sustainable Design, including consideration of costs and benefits. *Do you agree that an integrated planning and building approach would strengthen Environmentally Sustainable Design? Choose one option:***

- Strongly Disagree
 Disagree

- Agree
 Strongly Agree

Why?

41. Any other comments about chapter 6 (a more resilient and environmentally sustainable Melbourne)?

The number of dwellings that will be needed to accommodate a doubling of our population over the next few decades will likely negate many improvements in environmentally sustainable designs and land use, as this magnitude of housing will nonetheless require vast amounts of resources, fossil fuels and adjoining infrastructure to be built.

Chapter 7: New planning tools

- 42. The discussion paper includes options (options 58A and 58B, page 84) to evaluate whether new or existing planning tools (zones and overlays) could be applied to National Employment Clusters and urban renewal areas. *Do you have any comments on the planning tools (zones and overlays) needed for National Employment Clusters and urban renewal areas?***

- 43. The discussion paper includes options (options 59A and 59B, page 84) to evaluate the merits of code assessment for multi-unit development, taking into account the findings from the 'Better Apartments' process, to either replace ResCode with a codified process for multi-unit development or identify ResCode standards that can be codified. *Do you have any comments on the merits of code assessment for multi-unit development?***

See above comments regarding our concerns for high rise developments in the context of high population growth.

- 44. Any other comments about chapter 7 (new planning tools)?**

Chapter 8: Implementation

45. The discussion paper includes the option (options 1 and 61, pages 14 and 90) of Plan Melbourne being an enduring strategy with a long-term focus supported by a 'rolling' implementation plan. *Do you agree that separating the long-term strategy from a shorter-term supporting implementation plan is a good idea?*

46. *If a separate implementation plan is developed for Plan Melbourne 2016 what will make it effective?*

47. *Any other comments about chapter 8 (implementation)?*