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?*

> **A key challenge for Victoria is population growth.** A public debate on population growth has never occurred. It's time it did, instead of business and government simply 'going with the flow' and assuming infinite growth. There are limits to *sustainable* growth; some think Victoria has already passed the tipping point.
>
> **Addressing climate change is critical, but so too** is preserving and protecting environmental and natural resource values, particularly in Green Wedge and peri-urban areas (and Victoria). These challenges need equal emphasis.
>
> **"Flexible" and "discretionary", generic planning schemes** are also a major challenge, along with the trend towards "tick box" planning. They are pre-disposed towards development, fail to provide scope to adequately allow differences to be recognized or respond to local context, require competing objectives to be "balanced" which often sees economics prevail over planning and sustainability principles, and most decisions using these schemes are made by people with no experience in or understanding of planning where exercising discretion can be interpreted as being able to write your own rules. The VPP's generic template approach and restricted zones (e.g. one environmental zone for Victoria) limits strategic responses and results in the same outcomes being replicated across the State. One size doesn't fit all.

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:

> Many of the UN goals reflect "triple bottom line" objectives – sustainability principles, plus governance – which are particularly relevant to planning.
>
> Sustainability principles need to be embedded, and prioritized, in Plan Melbourne, State policy and the planning system. There is no real point saying Plan Melbourne *references* the UN sustainability goals, if the rest of the system fails to implement them.

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
X ☐ Strongly Agree

Please explain your response:

To date, a "permanent" boundary has proven elusive. Recent expansions of the Urban Growth Boundary are taking us towards the headline, *"Suburban sprawl reaches Swan Hill".*

Green Wedges and peri-urban areas are non-renewable resources. Preserving and protecting them provides more benefits and services to Victoria and Melbourne than turning them into housing estates.

Our preference would be for the UGB to be moved back from Macedon Ranges Shire before it is 'locked in'. Recent advertising for 5,000 acres at Darraweit Guim claimed it was a superb land-banking opportunity, ear-marked to accommodate metropolitan growth, and in the area of the Urban Growth Boundary.

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?*

Recognize Green Wedge and peri-urban areas are non-renewable natural resources, with non-renewable values that provide environmental, social and economic benefits to Melbourne and Victoria, not least because of their close proximity to metropolitan and suburban populations.

Recognise natural resources and services such as soils, drinking water and agricultural production, groundwater, waterways, clean air, geological and scientific values, rural landscapes, native flora, fauna and ecosystems, and open breathing spaces that provide contrast with Melbourne.

Recognise the inter-generational environmental, social and economic cost and detriment if we allow them to be lost. We must value, not exploit, these areas and stop seeing them as so much empty land waiting to be developed or as a dumping ground for 'stuff' that doesn't belong there. Protected from over-development, these areas provide far more pleasure, resources and benefits to far more people than the few who are served by unlimited development.

> **Recognise threats** – abusing and using the environment and rural land (particularly large commercial/tourism development) for financial advantage instead of protecting it, compromising agricultural production with housing, non-agricultural and large scale commercial development, rural living development.
>
> **Recognise constraints**, particularly potable water catchments, flora and fauna, habitats and ecosystems, fire.
>
> **Recognise Macedon Ranges** as more than 'peri-urban'. Processes have begun to produce legislation to protect this area's State level significance, natural environment and resources.
>
> **Delete Gisborne** from being a peri-urban growth town on the 2014 Plan Melbourne map of peri-urban areas.

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?*

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:

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
   X ☐ Agree
   ☐ Strongly Agree

Please explain your response:

> Would have been "strongly agree" except these concepts *don't* include a discrete environment theme (particularly important if these concepts extend to peri-urban areas), but *do* include partnerships with local government.
>
> Recognise that partnerships with local government, on occasions, do not automatically translate into partnerships with that Council's community. Before leaping into partnerships with local government, consider the consequences of partnering with a rogue council that does not represent its community's interests.

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

> We hold concerns about which parts of Plan Melbourne apply to 'peri-urban' areas, and which don't. This needs to be made clearer.
>
> Our experience of Melbourne 2030 was that its 'urban / metropolitan elements' were liberally applied outside the metropolitan area (e.g. dwelling density) while the "rural elements" (e.g. prohibiting rural living development, setting which towns would grow) were not.
>
> Planning in Victoria is Melbourne-centric. State policy does not include policy specific to rural areas, and Victoria does not have a "rural" ResCode. Proposed inclusion of over-arching Regional Growth Plan policy (source unknown) in the Planning Policy Framework (PPF) won't help. 'What's good for Melbourne' is repeatedly exported across the State, even when it produces damaging outcomes in the local rural context. Generic planning schemes promote suburban values and standards, offer a limited suite of zones, with overlays that only address development and Development Plan Overlays that extinguish third party rights whether or not an approved development plan exists.
>
> All of this, and ResCode, has had devastating impacts upon character and resulted in inappropriate development and over-development.
>
> When contemplating change in response to metropolitan issues (e.g. Neighbourhood Residential Zone), keep in mind that many controls and policies also apply **State-wide**. Changes that benefit or respond to Melbourne's circumstances often disadvantage, or don't produce acceptable outcomes in, rural areas.

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?*

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:

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?

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?

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?*

Please stop identification of rural town 'High Streets' as activity centres.

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?*

Victoria has been waiting years for controls that specifically protect rural land – and open special water supply catchments. Current closest-fit controls don't prioritise protection of either of these, they are just something else that has to be 'balanced' against other objectives using zones and overlays that aren't capable of adequately prioritizing protection of these non-renewable resources.

Water production, and food and fibre production (e.g. as opposed to equine activities), are dependent, in the first instance, upon rural land being available. On-going encroachment of residential and other non-rural activities undermines agricultural capacity and adds contaminating factors, often also compromising biodiversity and landscape values as well.

Even in this document, rural land is addressed as an economic resource (Delivering Jobs and Investment) instead of being recognized for the range of values and services it provides.

Introduce new, specific zones, overlays and/or particular provisions that recognize compatible use and development and prohibit everything else. Restrict/exclude activities and development not directly related to food and fibre production or which threaten water quality, including houses and hobby farms. Restrict 'superannuation' aspirations by prohibiting subdivision and reinstating tenement controls. Prohibit use, development and activities that are driven by economics rather than a sustainable relationship with the land and resource. Protect these resources, or lose them.

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?*

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

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?

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?*

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

Peri-urban context? Transport options may not exist or be very limited.

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?

    See comment at Question 8 regarding metro changes, and impacts in a rural context.

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

    See comment at Question 8 regarding metro changes, and impacts in a rural context.

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
    X ☐ Agree (in principle)
    ☐ Strongly Agree

    Why?

    Macedon Ranges Shire is proposing to apply the Urban Growth Zone at Riddells Creek. How would these changes play out in a rural context?

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 comment at Question 8 regarding metro changes, and impacts in a rural context.

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?

See comment at Question 8 regarding metro changes, and impacts in a rural context.

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?*

See comment at Question 8 regarding metro changes, and impacts in a rural context.

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?*

See comment at Question 8 regarding metro changes, and impacts in a rural context.

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
X ☐ Other

Why?

This zone is also applied outside metropolitan Melbourne, where circumstances, including character, infrastructure and services, can be very different to the circumstances being discussed here.   Before making changes that suit Melbourne, consider the effect and impacts of changes in rural areas.

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?*

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?

See comment at Question 8 regarding metro changes, and impacts in a rural context.

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

Community resistance to "housing diversity" largely reflects the greed, over-development and poor outcomes produced by the current planning system.

Before changing Statewide controls, consider impacts in rural areas. Victoria does not have a 'rural' ResCode, and it shows with character-damaging metro style development and over-development rural areas have been forced to take.

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
X ☐ Strongly Agree

Why?

Also recognize the need to comprehensively protect Special Water Supply Catchments in peri-urban areas, along with impacts of car dependency, reliance upon wood heating, and impacts of ongoing vegetation removal, including bushfire buffers for development.

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
X ☐ Strongly Agree

Why?

Introduction of the VPP has clearly demonstrated that 'discretion' and conflicting State policies do not produce good or acceptable outcomes in the face of economic proposals, pressure for development and lack of prescriptive planning language.

Overlays only address development, not use, and neither overlays nor policy say 'must', or prohibit.

There is also, in some quarters, a perception that both strategic (e.g. landscape scale) assessment and statutory issues are adequately addressed by Bushfire Management Overlay provisions, even in extreme hazard areas. Even though areas outside BMOs are increasingly vulnerable, if there isn't a BMO, there isn't a hazard.

Memorandums of Understanding should be reviewed or removed to ensure every proposal in hazard areas is addressed on its merits.

Referral authorities must be provided with a right of veto.

33. **The discussion paper includes options (options 48 and 49, page72) 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?*

Supported. The problem is, how are these findings to be implemented so they can't be ignored or circumvented?

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
X☐ Strongly Agree

Why?

Existing requirements are often seen as not binding: "just policy", only says "should", not mandatory, one more won't hurt. If this situation can be improved, it is supported.

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
X☐ Strongly Agree

Why?

Don't stop at major infrastructure projects. New infrastructure including infrastructure associated with residential subdivision and development e.g. drainage requirements, are often set at standards that have been in place for years. Worse, new infrastructure is often connected to systems that are even older, and at times themselves failing.

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
X☐ Strongly Agree

Why?

These are being consumed, damaged and destroyed by thoughtless, greedy and inappropriate uses and developments, including loss for fire prevention measures when development is allowed in high risk areas.

The weakness in what's proposed is that it focuses only on "high priority" and "key" – prioritize and protect them all.

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?*

Less people.

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
X ☐ Strongly Agree

Why?

Care is needed that this isn't translated into promoting wind farms and towering turbines in high value landscape, and high bushfire hazard, areas.

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
X ☐ Strongly Agree

Why?

Sustainability.

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
X ☐ Agree
☐ Strongly Agree

Why?

Would not support this if it becomes solely the provence of building. These matters need to be first addressed at planning stage.

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

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?*

Not supported. Fails to take account of local context. 'Tick box approach' makes for lazy planning.

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

It's time for the planning system to recognize rural areas are different to Melbourne, and generic planning schemes and controls are eroding the character of Victoria. The limited suite of zones available and inability to craft controls to achieve fully strategic outcomes in the local context allows inappropriate land use and development to flourish, undermining important resources and values.

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)?

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| |