

18 December 2015

Plan Melbourne Team
Department of Environment, Land, Water and Planning
Plan Melbourne Refresh via Online Submission

Dear Plan Team

The Melbourne Airport Community Aviation Consultation Group (CACG) was formed in response to the Australian Government's National Aviation Policy White Paper at the commencement of 2011. Our group, which meets quarterly in open session, draws its membership from the community, government, and the aviation sector. We hear from the community first hand at our meetings regarding the importance of not allowing inappropriate development on land around Melbourne Airport and of the experience of residents living in areas impacted by aircraft noise and aviation.

The CACG is also keen to see the Melbourne Airport rail link constructed at the earliest opportunity to complement existing and proposed road infrastructure serving the airport.

Our submission to Plan Melbourne Refresh is attached. I am available to discuss its content at your convenience or otherwise assist if further explanation or development of options for consideration is required.

Yours sincerely

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?*

Airport Safeguarding

1. Melbourne Airport is identified in Plan Melbourne 2014 as one of a number of existing "Transport Gateways". These are recognised as a State Significant element and '*will be protected from incompatible land uses but adjacent complimentary uses and employment-generating activity will be encouraged.*' A short term initiative: '*Update the State Planning Policy Framework to strengthen airport safeguarding, consistent with the objectives of the National Safeguarding Framework*' was identified under Initiative 3.6.3. This has now occurred.

Notwithstanding this high level strategic policy position, which has bi-partisan support, the intention is not fully developed in Plan Melbourne 2014 or PM Refresh and consequently it has the potential to become a competing priority along with those more clearly articulated (eg the introduction of housing targets). As a consequence there is a risk it will be given less weight and the expressed intent may be compromised. Recent experience by the CACG suggests there has not been a high level of awareness or commitment to balancing the safeguarding requirement with other considerations, by local government and the Metropolitan Planning Authority. For example; changes have been made to planning controls in relatively recent times to permit more land to be developed for residential purposes and a proposal to allow increased densities at Diggers Rest was only averted at the "eleventh hour" following external intervention.

2. Melbourne Airport is situated on the boundary of two sub-regional groupings of councils and consequently there is a risk that consideration of matters relevant to safeguarding the airport will "fall through the cracks". In addition, Plan Melbourne 2014 identifies six National Employment Clusters (to be renamed National Employment and Innovation Clusters). While the area around Melbourne Airport is recognised as being an "Investment and Employment Opportunity", the importance of holistic and comprehensive planning of this area is not identified or addressed. The Melbourne Airport Master Plan 2013 addresses planning on the airport but clearly there is a gap in relation to adjacent areas, notwithstanding that the municipal planning schemes do cover these areas.

3. Aircraft approaches to Melbourne Airport from the west and north are within the green wedges, as is graphically demonstrated on Map 3 in Plan Melbourne 2014. Equally, the same map shows the approaches to the east and south as being developed and consequently, subject to pressures for redevelopment and increased densities over time. In theory, recognition of the National Safeguarding Framework in the SPPF should prevent this, however the CACG believes much greater thought needs to be given to how effective this will be.

The CACG regularly hears from residents who state the "liveability and amenity" of their neighbourhoods are impacted by aircraft noise. In some cases Melbourne Airport was constructed after the suburbs were developed but in other cases, bad planning decisions have permitted inappropriate development. What is clear is that the green wedges adjacent the airport must be protected and the "airport safeguarding" imperative associated with this should be clearly articulated. ie it is about more than protecting the environment and land for agriculture. In addition, urban densities in existing developed areas adjacent the airport should be managed to ensure they do not increase and every opportunity is take to reduce them by encouraging more appropriate land

uses when the opportunity arises.

The CACG believes:

- a. the text of Plan Melbourne 2016 should be reviewed at draft stage to consider how each of the policies/initiatives will be applied in those areas adjacent Melbourne Airport, how planners and government agencies will read/interpret/understand and apply the text and whether or not further clarity is required to emphasize the importance of airport safeguarding and its ranking in relation to competing policies.
- b. governance arrangements relating to planning around Melbourne Airport should be reviewed to consider if a more effective model could be developed.

Airport Rail Link

Protection of the corridor for the airport rail link is identified in PM Refresh but there is no indication of when this will occur. It had previously been identified in Plan Melbourne 2014 as being part of the Melbourne Rail Link but its current status is unclear. The CACG supports its construction at the earliest opportunity and believes some indication of timing ought to be given in Plan Melbourne 2016.

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:

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
- Yes Strongly Agree

Please explain your response:

Areas around the airport need to be protected from inappropriate development so that:

- a. future residents are not exposed to aircraft noise
- b. noise abatement procedures can be employed to lessen the impact on existing residents ie it is consistent with 'airport safeguarding' principles

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?*

The important role the green wedge plays in relation to safeguarding Melbourne Airport needs to be clearly articulated. It needs to emphasise this is a social issue - about safeguarding 'liveability and amenity' for those who live in proximity to the airport.

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?*

While the inclusion of Transport Gateways on a 2050 map is supported, it needs to be complemented by high level text which will drive the next level of work for ALL these precincts, including Melbourne Airport.

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
 Agree
 Strongly Agree

Please explain your response:

How a balance will be achieved between these key concepts and airport safeguarding needs to be

spelt out.

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

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?**

- 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?**

- 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)?

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?

The implementation of a 70/30 target needs to address protection of those areas around Melbourne Airport from increased housing densities. This goes beyond the existing MAEO boundaries, based on ANEF contours, which are included in the VPPs. Currently there is no mechanism for determining the extent of protection required and it is an urgent piece of work that needs to be done in conjunction with enhancing planning governance arrangements.

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

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?

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?

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?*

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?*

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?*

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?

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?

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?

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?

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?

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?

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)?*

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?***

As stated elsewhere, an enhance governance model is required to oversee planning around Melbourne Airport and, in particular, to ensure competing pressures are managed in an appropriate manner and airport safeguarding is not compromised.

- 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?***

- 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)?*