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Q1. I am entitled to deal with the intellectual property rights (including copyright) of all material (and third party's) in my submission and have obtained the necessary consent(s) from any and all third parties. I agree

Q2. Where personal information about other people (including photos) is included in my submission, I have notified them of the contents of the Privacy Collection Notice and obtained their consent to their personal information being disclosed to the Plan Melbourne refresh and published. I agree

Q3. Name of organisation West of Elgar Residents Association Inc

Q4. Please select from one of the options below I am making this submission on behalf of an organisation. Submissions by organisations will be published including the name of the organisation.

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Q8. I have read the relevant terms of use and consent to the conditions outlined within these. Yes

Q9. Please note that submissions where the relevant terms of use have not been agreed to may not be considered as part of the Plan Melbourne Refresh. Please describe below your reasons for submitting despite together with any specific reasons for not agreeing to the terms outlined above.

not answered

Q10. The discussion paper includes the option (option 5, page16) 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?

Rapid population growth and the impact of climate change are the most significant factors impacting on Melbourne's development in the near future. These factors will in turn generate unsustainable demands for water, the escalation of significant loss of biodiversity in the city and its environs and a significant decrease in community well being. The key to managing development is to reduce the rate of growth.

Q11. **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?** Strongly Agree

Q12. **Please explain your response**

Sustainable development acknowledges that the impact of increased population and urban infrastructure comes at an environmental and social cost. Although sustainable development is often claimed to be possible, the reality of the property development market is such that these goals are often paid lip service. They should be incorporated into the VPP so they are legally binding

Q13. **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?** Agree

Q14. **Please explain your response**

the continued expansion of suburbia into arable farmland and green wedges should be limited by an urban growth boundary which should also restrict the opportunity to limit speculative profits from changing land uses.

Q15. **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 wedges and peri-urban areas?**

Plan Melbourne can protect these areas by applying environmental protection overlays in the VPP so that there is a legislative protection for green wedges and overlays on peri-urban areas which will protect farming and restrict sub-division in these areas. The restriction on third party rights in relation to environmental protection issues also needs to be removed

Q16. **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 other elements should be included in a 2050 concept map for Melbourne?**

environmental protection and green infrastructure elements should be included in a 2050 concept map based on projected population growth for Melbourne. In order for increased density or high rise development to be approved, local councils and VCAT need to take account of the areas to be reserved to provide a minimum acceptable per capita access to green open space, however this is to be funded.

Q17. The discussion paper includes the option (option 10, pages 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 proposed definitions adequately clarify the concepts?

Agree

Q18. Please explain your response

The current proposal is not feasible or realistic and the 20 minute concept needs to be more clearly defined. From which point is the 20 minute city to be measured and to what extent are the Neighbourhood and current Major Activity Centres already meeting this need? The proposed definitions presented in the Plan do not adequately clarify the concept or how it would be retro-fitted across Melbourne

Q19. 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?

Agree

Q20. Please explain your response

The inclusion of climate people place and identity and local government partnerships are supported but not housing. Housing is an element which is more appropriately dealt with at the local council level unless housing principles such as sustainability, accessibility across the life span and the regulation of housing build quality are included.

Q21. Any other comments about chapter 2 (growth, challenges, fundamental principles and key concepts)?

The fundamental principle of requiring middle ring suburbs to provide more housing capacity is unrealistic as is the idea that increasing housing supply in these suburbs will increase housing affordability. Demographic studies indicate that greyfield development will not occur as older residents age in place and the greatest demand in future housing will be from young families not wishing to live in high rise towers

Q22. Climate change comments

Climate change will exacerbate the impact of too rapid population growth, particularly in relation to water supply. Extensive periods of drought will require a significant investment in recycling of water and more water efficient urban design, and the need for alternative energy sources for cooling as temperatures soar.

Q23. 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?

It is not clear how a strategic plan for Melbourne land use will generate innovation and knowledge management growth. There are already clusters across the city and the role of the National Employment Clusters is yet to be explained. How will urban planning generate the activities which are being proposed? This is not explained.

Q24. 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

Q25. Please explain why you have chosen your preferred option

If you must include this element then it would be more logical to consider Victoria and Melbourne's strategic and competitive advantage and the historic development of employment and knowledge hubs. The decline of manufacturing in Melbourne should be a catalyst to generating alternative industries but this is a largely economic issue rather than a matter of town planning.

Q26. The discussion paper includes the option (option 22, pages 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?

Agree

Q27. Why?

On the assumption that changing the name will result in more economic development opportunities in that region then this is supported. However, the link between precinct planning and economic development is never explained

Q28. **The discussion paper includes the option (option 23, pages 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?**

not answered

Q29. **Why?**

see above

Q30. **The discussion paper includes options (options 24 to 30, pages 34-35) 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?**

The 20 minute city concept does not integrate with the current Activity Centres as identified in Melbourne 2030. They cannot be reconciled as they are based on opposing concepts. Current Centres should have their boundaries clearly defined and fixed. They should be required to provide transport and open space resources to support their higher populations. Future centres should be located near public transport or planned future public transport

Q31. **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?**

This is supported. the outcome of an independent review would identify whether current planning mechanisms are adequate and how the planning system could better protect agricultural land and activities.

Q32. **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? Reference page 36.**

This is not supported

Q33. **Any other comments about chapter 3 (delivering jobs and investment)?**

These plans count for little if they are not supported by detailed transport, economic development and investment strategies by Government

Q34. **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?**

Strongly Agree

Q35. Why?

There has been little significant investment in Melbourne's public transport system for the last 50 years compared to 19th century Melbourne. Sustainable population growth cannot be supported by increased road transport for passengers and freight and transport links should be in place before more intensive development precincts are established especially in outer Melbourne

Q36. 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?

There should be a statewide strategy to support and resource walking and cycling networks and this should be included in the VPP with resourcing from the State Government.

Q37. Any other comments about chapter 4 (a more connected Melbourne)?

The under-investment in public transport in Melbourne is already generating unacceptable congestion and productivity costs. A decentralisation policy which would see more economic and population growth in regional centres depends on fast rail links between these centres and the CBD

Q38. The discussion paper includes the option (option 36A, pages 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? Strongly Disagree

Q39. Why?

the target for established areas is strongly rejected. Meeting this target would require high density development in areas where it is not appropriate. This proposal is premised on the idea that "greyfields" areas will yield additional land on which to generate an increased supply of medium to higher density housing. Senior residents are ageing in place; land values in these areas make housing unaffordable for most people and the highest future demand for housing will be from families for whom medium to higher density housing is inappropriate

Q40. What, if any, planning reforms are necessary to achieve a 70/30 target?

This target is not supported and it is difficult to see how it could be mandated without setting housing and population targets for each LGA

Q41. 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? Agree

Q42. Why?

This would ensure that Precinct Structure Plans are generated in a timeframe driven by demographic trends and land supply needs

Q43. 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? Strongly Disagree

Q44. Why?

As outlined above this strategy will not achieve increased affordable housing supply at least in the next 10-15 years as older residents remain in detached housing for preference and increased supply does not generate more affordable housing given the prevailing land values.

Q45. 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? Other

Q46. 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?

The intention of Activity Centres was to locate more intensive population and housing growth in areas which had the infrastructure to support them. These high change areas have already been identified but investment has generally preferred to target overseas buyers, investors or middle ring unit subdivision. The planning zone reform was intended to protect areas of valuable character but with limited success because all councils had to meet a housing and population target.

Q47. 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?

Remove the requirement in the VPP (and M2030) that all planning decisions must address urban consolidation objectives and increased housing capacity regardless of where the proposed development occurs. Allow councils to set permeability, site coverage, height and distance from boundary measures. These alone can protect Melbourne from development which is inappropriate in scale- height or scale and which removes tree canopy and vegetation coverage (not by lot but by local area).

Q48. 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?

Option 40B

Q49. 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?

This is an issue of building quality and standards which should be addressed by the Building Authority of Victoria. It should also be a requirement in all housing policies in the local planning scheme that dwellings must meet certain minimum standards for light, access and egress, energy conservation, mobility and ventilation

Q50. 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?

Housing affordability is generally driven by land value. One of the consequences of limiting land supply is to increase the value of the land which is available for development. Melbourne has a generous quantity of supply available within the urban boundary although outer urban development has limited economic and transport options. none of the above options above are supported

Q51. Any other comments about chapter 5 (housing)?

There is a shortage of affordable supply of housing in the inner and middle ring suburbs. This is the direct result of dramatic population growth which is fuelling massive investment in high rise and other development. The housing industry responds to market conditions. Unless government becomes involved again in public housing it is unlikely that increasing supply in these areas will increase affordability

Q52. 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?

Strongly Agree

Q53. **Why?**

These principles should be the first consideration in any development or land use proposal. Strategic Environmental Principles should have legal status in the VPP and inform all other levels of planning including VCAT's role in the planning system

Q54. **The discussion paper includes the option (option 47, page 72) proposes 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 proposal?** Agree

Q55. **Why?**

I principle this is supported although how overlays are used in this way is not explained.

Q56. **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?**

This is supported for the reasons outlined above

Q57. **The discussion paper includes the option (option 50, pages 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?** Agree

Q58. **Why?**

in principle agreement although the detail of this proposal would need to be provided assuming that the overlay process for these purposes would follow the same process as any other overlay?

Q59. **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?** Strongly agree

Q60. **Why?**

We support this proposal because the planning system takes a very limited and localised approach to environmental protection which does not take account of future climate change risks or expected population growth. The current approach works well with areas to be protected, but where residential or other development is proposed there is little requirement to consider infrastructure resilience because of the piecemeal approach to planning for urban development

Q61. **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 proposal?** Strongly agree

Q62. **Why?**

This is supported although there is no explanation of how these corridors and peri-urban areas will be protected. There would need to be a strong regulatory approach rather than a general commitment to protection

Q63. **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 above strategies are supported but increasing tree canopy and vegetation does not work well with increased densification as implemented to date. The loss of private gardens is a significant factor in the creation of urban heat sinks and there is little requirement for high rise development to include sufficient green open space to provide appropriate access to the inhabitants. Permeable surfaces are not generally associated with sub-division, boundary to boundary development as practised now and McMansions on small lots with no private open space

Q64. **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?** Agree

Q65. **Why?**

Agree that this is desirable but only in the context of a consideration of the overall sustainability and environmental protection of designated precincts. It is difficult to see how this could be mandated in the planning system. What does facilitation involve?

Q66. **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?**

Agree

Q67. **Why?**

This is an appropriate consideration for structure planning in green fields sites

Q68. **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?**

Agree

Q69. **Why?**

environmental building design does not offset the destruction of the local environment including the protection of and planting of trees to deal with carbon minimisation. The externalities of the development or other land use proposal needs to be considered in the context of its contribution or diminution of the total environmental assets or value in a local area

Q70. **Any other comments about chapter 6 (a more resilient and environmentally sustainable Melbourne)?**

There is a fundamental conflict between increased population, increased urban densification and environmental sustainability given the current mechanisms and market operations in Australia

Q71. **Please provide your feedback on 'Chapter 7. New planning tools' below. If you do not want to provide feedback on this chapter please selected 'save & continue'.**

not answered

Q72. 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?

Planning tools for urban renewal areas already exist. The local planning authority, within agreed statewide planning frameworks, has the responsibility to plan for urban renewal. However, the current approaches give little weight to the concerns and needs of the existing residents and more consideration to the needs of future residents. Given the assumption that projected growth is manageable this proposal may involve more stringent requirements for infill development in middle suburbs which is not supported. How are urban renewal areas to be identified?

Q73. 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?

We do not support code assessment processes for multi-unit development because these developments generally pose greater challenges to minimising the off site impacts on residents and to protecting the remnant trees and vegetation or requiring the planting of new ones to replace those which have been bulldozed prior to the planning application process.

Q74. Any other comments about chapter 7 (new planning tools)?

The experience of the recent planning zones reform in Whitehorse has generated much cynicism about the role of planning tools in achieving more appropriate developments and minimising environmental and other externalities from urban renewal. Councils were unable to apply the NRZ code and amend the ResCode schedules as they were originally promised.

Q75. 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?

A strategic plan should be a blueprint with a long term focus. M2030, Plan Melbourne and Plan Melbourne Refreshed reflect the priorities of particular state governments. In principle separating the longer term strategy from shorter term implementation planning is supported provided that there is widespread community support and legislative debate about the strategic framework and changes to the planning legislative framework

Q76. If a separate implementation plan is developed for Plan Melbourne 2016 what will make it effective?

community support for the blueprint is a pre-requisite and as no state election has even been fought on such a planning framework it is difficult to test whether there is general and bipartisan support for Plan Melbourne. The majority of the community are unaware of the implications of planning changes for Melbourne and since they are unable to vote on this matter, feel disenfranchised

Q77. Any other comments about chapter 8 (implementation)?

not answered
