Wyndham City Council Submission

Introduction

Thank you for the opportunity to submit comments on the Discussion paper ‘Plan Melbourne Refresh’.

Council wishes to commend the Minister for Planning for inviting discussion on core issues requiring further attention in the current Plan Melbourne metropolitan strategy.

As outlined in the following submission endorsed by Council at its Ordinary Council Meeting held on 14 December 2015, Wyndham City has identified 19 key opportunities and challenges for consideration in the current review of Plan Melbourne. A summary of these is provided at the head of the submission, with further detail in the body of the document, which has been prepared in accordance with the suggested template. The submission also includes a series of diagrams to help illustrate matters that have a spatial context.

If you wish to discuss any elements of the submission further, please contact

Yours faithfully,

Director Sustainable Development
**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?*

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**A well-considered plan**

Wyndham’s list of key opportunities and challenges that should be embraced in the “Refresh” of Plan Melbourne to “give our present and future citizens an even better quality of life, a higher standard of living and access to greater opportunities” include the following:

1. Leveraging the $4 Billion investment already made in the Regional Rail Link project as a significant driver of employment and employment diversification in Melbourne’s west and averting the development of a divided city (See Map 1)
2. Leveraging the $4 Billion investment already made in the Regional Rail Link project to deliver productivity opportunities for the western metropolitan region and Melbourne more broadly from the perspective of providing affordable living options and housing diversity opportunities with excellent access to job rich locations and averting the development of a divided city (See Map 1)
3. Rectifying the current imbalance in the polycentric constellation of Melbourne’s Metropolitan Activity Centres by designating the Werribee City Centre as a Metropolitan Activity Centre to complement and strengthen the Werribee National Employment and Innovation Centre (NEIC) (See Map 3)
4. Reframing Plan Melbourne as a ‘spatial plan’, ‘infrastructure plan’, ‘implementation plan’, and ‘monitoring and evaluation plan’, incorporating a ‘managing growth plan’ that sets out a strategy for delivering coordinated infrastructure across Melbourne including its growth areas and outer suburbs
5. The metropolitan strategy should not be predominantly based on planning by numbers (i.e. 70/30 split of development between established and outer urban areas or blanket 25 dwellings per hectare ratios) it should focus on the spatial distribution of opportunities that Melbourne provides, particularly opportunities like the Regional Rail Link project (See Map 1)
6. Timely delivery of railway stations and proposed spur line connection on the new Regional Rail Link and metro rail line to bring people and jobs closer together along the Geelong – Melbourne rail corridors (See Map 1)
7. Development of an alternative west-east crossing to the West Gate Bridge (i.e. Western Distributor proposal)
8. Averting the development of a divided city by supporting the National Employment and Innovation Clusters identified in Plan Melbourne, in particular at Werribee, Sunshine and La Trobe, to help deliver jobs and services to the middle and outer areas of Melbourne that are most likely to be affected by the closure of the car manufacturing industry and further contraction of manufacturing
9. Locking down a permanent Urban Growth Boundary that protects Melbourne’s remaining green wedges, biodiversity values, and agricultural land from urban encroachment
10. Supporting farming in the peri-urban areas by providing security of water supply, quality of supply (i.e. appropriate salinity levels), and appropriate water pricing
11. Developing an integrated water delivery network to ensure sustainable and secure access to water for Melbourne and integrating this with the urban development pattern of the metropolis, including making best use of all the existing and future water infrastructure of the State (including the role of the Wonthaggi desalination plant and the Western and
Eastern treatment plants in terms of the reuse of water) (See Map 10)
12. Giving due consideration to the findings and recommendations of the Senate Committee Inquiry into Affordable Housing, including inclusionary zoning
13. Continuing support for the development of Avalon as Melbourne’s second domestic and international airport
14. Reconsideration of the location of Melbourne’s secondary container port (Bay West proposal) to take advantage of the transport logistic advantages of the West Port Phillip district
15. Timely construction of the Outer Metropolitan Ring Transport Corridor to enhance Melbourne’s Freight handling capacity and facilitate the construction of the Western Intermodal Freight Terminal
16. Giving Melbourne a contemporary definition that is reflective of its spatial dynamic as a global trading city based on the shores of Port Phillip and integrated with the surrounding region (in particular, to the outer extent of the regional train myki zones), and beyond to the adjoining states (See Maps 2, 4-9)
17. Introduction of density and housing diversity guidelines in Precinct Structure Plans along the new Regional Rail Link corridor to ensure appropriate dwelling densities and diversity will be developed around current and new railway stations
18. Completing the Port Phillip Bay Trail between Werribee and Geelong to create a new global ecotourism attraction and marketing opportunity for Melbourne (See Map 2)
19. Enhancement of Plan Melbourne’s governance arrangements by including Geelong as a sixth sub-region of Melbourne, and inviting representation onto the MPA Board from metropolitan local government and Regional Cities Victoria, to improve its appreciation of local government issues and the metropolis’s interface with regional Victoria (See Map 9).

In reviewing Plan Melbourne, it is useful to reflect on the foreword of the Metropolitan Town Planning Commission’s 1929 Plan of Melbourne:

“If a city is to serve its true functions it must have guidance and control in development according to a well-considered plan. In this way only can economy in public expenditure as well as efficiency and comfort be enjoyed by the various classes of people who constitute its population.”

Commentary in support of the above recommendations is provided below and in the following sections of the template submission.
Map 1: Leveraging $4 Billion of New Regional Rail Link Infrastructure

Map 2: Port Phillip Bay Trail – Completion of Missing Geelong – Werribee Link to create new global ecotourism attraction that promotes active transport and markets Melbourne as a Livable City
Map 3: Werribee National Employment & Innovation Cluster, including Werribee Metropolitan Activity Centre

Map 4: Major Regional Towns at Extent of Myki Zones – Nearly 9 out of 10 Victorians (89%) live within 150km of the Melbourne Central City; 82% within 100km; and 75% within Greater Melbourne (Source: Melbourne Facts, November 2012)
Map 5: Regional Train Myki Zones

Map 6: The Greater Melbourne Capital City Statistical Area, upon which the construct of Metropolitan Melbourne and Plan Melbourne maps are primarily based, is not reflective of the modern dynamic of Melbourne as a functioning metropolis. It excludes Greater Geelong, and falls short of daily commuter patterns, including the extent of Myki train zones.
Map 7: Conveying the dynamic of the interdependent relationship between the Melbourne metropolis and its hinterland of green belt, peri-urban areas, and regional cities.


Map 8: Emphasizing Melbourne’s connection to regional Victoria is predominantly from the north-west

**Map 9:** Factoring in the Geelong Region as part of the metropolitan planning process is not a novel concept as demonstrated by this 1967 Town and Country Planning Board of Victoria proposal extracted from a report entitled “Organisation for Strategic Planning” showing possible regional units for physical planning of Melbourne within the context of the Melbourne Port Phillip District. Avalon Airport, Port Phillip Bay Trail, and potential Bay West container port proposal are metropolitan city shapers that support planning within the context of a Port Phillip District.

(Source: Organisation for Strategic Planning, A report to the Minister for Local Government in response to his letter of 3rd May 1966 on future growth of Melbourne, Town and Country Planning Board of Victoria, July 1967)

**Map 10:** The challenge of varied rainfall distribution over Greater Melbourne emphasizes the importance of developing an integrated water delivery network to ensure sustainable and secure access to water, particularly as Melbourne’s population grows towards 7.7 million people by 2050.

Socio-economic spatial analysis v Planning by numbers approach

The metropolitan strategy should be based on a spatial distribution of opportunities and accessibility and not on a planning by numbers approach (i.e. 70/30 split of development between established and outer urban areas or blanket 25 dwellings per hectare ratios) although it is recognized that targets have an important role to play in helping to steer direction towards desired sustainable outcomes. Plan Melbourne needs to be more strongly based on a socio-economic spatial analysis of the settlement pattern and current dynamic of Greater Melbourne’s function as a trading city in a global economy, which extends beyond the construct of the outdated Melbourne Statistical District (MSD) that is repeatedly used as a straight-jacket in defining the extent of the metropolis of Melbourne and its governance arrangements.

While the required spatial approach is largely reflected by the polycentric model already proposed by Plan Melbourne, this tends to stop at the boundaries of the MSD. What is required is a stronger visual representation of Melbourne as a settlement around Port Phillip, the connection between inner and outer Melbourne, and between Melbourne and its hinterland (in particular, up to the 150km arc of surrounding regional towns inside which 89% (nine out of ten) of Victoria’s population resides (Source: Melbourne Facts, Plan Melbourne, November 2012). It is important to emphasise that regional towns up to Geelong, Ballarat, Bendigo/Eaglehawk, Seymour and Traralgon are within the myki zone (see http://ptv.vic.gov.au/assets/PDFs/Maps/Network-maps/Regional-Network-Map_myki-zones_connections.pdf). This dynamic defines Melbourne as a city region, rather than just a metropolitan area.

The spatial consideration of the dynamics of our metropolis outside the construct of the MSD will help to identify wider confluences of opportunity for future prosperity; a better opportunity to leverage off existing infrastructure that is capable of delivering productivity and sustainability returns to the state; and guide decisions such as where Melbourne’s transport infrastructure development, transit oriented corridors and secondary container port should be concentrated. (See further comments in Section 5 below in response to Replace Integrated Economic Triangle with high level 2050 concept map of Melbourne.)

A Changing-economy and potential geographical inequalities

As appropriately identified by the Minister for Planning in his foreword to the Plan Melbourne Refresh Discussion Paper, Plan Melbourne needs to avoid the sorts of geographical inequalities that plague many of the world’s fastest growing cities. A significant challenge to be addressed is the continual contraction of manufacturing due to the creative destruction processes of globalization through the removal of tariff protection, the floating of currency on the international money market and the transfer of global manufacturing capital to nations of cheaper labour costs and greater government subsidy. Melbourne’s largest employment sector, which once represented 40% of all employment, has suffered a large gradual contraction over the past 60 years from 40% to 10.8% (2011). A further contraction of manufacturing is anticipated with the simultaneous departure of all three of Melbourne’s global car manufacturers (Toyota, Ford, and Holden) responsible for producing Victoria’s second largest manufacturing export, $1.257 billion, in 2012-13 (Department of Foreign Affairs and Trade, 2013). Economic analysis conducted by Adelaide University on the closure of the car manufacturing sector has estimated that by 2017, approximately 100,00 jobs in Melbourne (200,000 Australia wide) will be lost resulting in a negative annual shock to Victoria’s Gross Regional Product of $13.977 billion dollars in 2011 prices (Barbaro, Speohr and National Institute of Economic & Industry Research (NIEIR), 2014). As further acknowledged in What the departure of Toyota, Holden and Ford really means for workers by S. Weller, published by The Conversation in 2014, the loss of the total industry will present a significant spatial challenge to Melbourne as many of the jobs are concentrated in the traditional car manufacturing feeder suburbs of outer Melbourne. Analysis
by Barbaro, Speohr & NIEIR estimates that the impact is expected to be greatest in the outer growth area councils as shown in the Table 1. Below:

Table 1: The top ten Local Government Areas of Melbourne most affected by job losses in the car manufacturing industry (by residence of employee) -

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<tr>
<th>Order</th>
<th>Local Government Area</th>
<th>Estimated Jobs Lost</th>
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<tbody>
<tr>
<td>1</td>
<td>Casey</td>
<td>6,734</td>
</tr>
<tr>
<td>2</td>
<td>Greater Geelong</td>
<td>4,984</td>
</tr>
<tr>
<td>3</td>
<td>Hume</td>
<td>4,736</td>
</tr>
<tr>
<td>4</td>
<td>Brimbank</td>
<td>4,432</td>
</tr>
<tr>
<td>5</td>
<td>Wyndham</td>
<td>4,360</td>
</tr>
<tr>
<td>6</td>
<td>Whittlesea</td>
<td>3,453</td>
</tr>
<tr>
<td>7</td>
<td>Greater Dandenong</td>
<td>3,321</td>
</tr>
<tr>
<td>8</td>
<td>Knox</td>
<td>3,258</td>
</tr>
<tr>
<td>9</td>
<td>Kingston</td>
<td>3,176</td>
</tr>
<tr>
<td>10</td>
<td>Yarra Ranges</td>
<td>3,087</td>
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Further job losses are anticipated from the contraction of other manufacturing. What needs to be averted is the development of Melbourne as a divided city – a centre optimal in opportunity and choice, and a periphery where access to prosperity is further from reach. As documented by Fainstein in her book *The Just City*, the loss of social equity and social well-being is often the consequence of de-industrialisation and globalization for post-industrial cities where traditional jobs are lost and workers left with no other choice than to accept lower paid work.

Plan Melbourne’s role in addressing the above challenge should focus on the following key directions:

- Concerted effort on the development of the polycentric constellation of the National Employment and Innovation Clusters already identified in Plan Melbourne, in particular the establishment of the emerging clusters at Werribee, Sunshine, Dandenong and La Trobe to help deliver jobs and services to the middle and outer areas of Melbourne that are most affected by the closure of the car manufacturing industry and further contraction of manufacturing. With particular regard to the Werribee National Employment and Innovation Cluster (NEIC), an associated strategy is the designation of the adjacent Werribee City Centre as a Metropolitan Activity Centre (MAC), currently overlooked by Plan Melbourne and Plan Melbourne Refresh. The MAC designation is required to strengthen the Werribee polycentric node, as per the Sunshine and Dandenong MAC/NEIC.

- All National Employment Clusters should be serviced by excellent public transport availability. From a West Port Phillip perspective, the concept of the polycentric city and constellation of National Employment Clusters needs to acknowledge and embrace the dynamic of the new Regional Rail Link, existing metropolitan rail network, and future Avalon Rail connection that will bring people and jobs closer together within acceptable commuter travel time distances between Geelong CBD – Avalon Airport – Werribee National Employment and Innovation Cluster/Werribee City Centre – Sunshine National Employment and Innovation Cluster – Footscray – Melbourne CBD.

- A significant outcome of the new Regional Rail Link corridor in Wyndham is that upon the completion of all proposed future railway stations and associated connecting spur line joining the RRL and metro rail corridor, 95% of Wyndham’s urban development will be within 3km of...
a railway station. The early delivery of the proposed stations is as important as the current grade separation program to improving the productivity of the Melbourne metropolis.

- The development of infrastructure associated with enhancing Melbourne’s national and global transport logistics, i.e. the development of the outer Melbourne Intermodal Freight Terminals proposed in the Victorian Freight and Logistics Plan with a view to developing these areas as Logistics City National Employment Clusters based on the concept previously embraced by Freight Futures (Department of Transport, 2008).

- The further development of Avalon Airport as Melbourne’s second domestic and international airport. Airports are recognized as high agglomeration employment centres. Its geographic location between Geelong and Werribee makes it another important employment cluster for both Geelong and the west of Melbourne.

- A review of the previous government’s decision to relocate Melbourne’s secondary container port to the Port of Hastings against the Bay West container port proposal which potentially proposes a more cost effective solution based on a stronger confluence with the State’s existing freight network infrastructure, if a deeper port is not required as previously assumed. As noted by Parsons & Van Duyn in “Build it - but will they come?: A pre-mortem analysis of the Port of Hastings Development project to encourage alternative integrated planning” (2014), vessel sizes are not influenced by government policy but by the economics of freight volumes.

- Reviewing or initiating Cost-Benefit-Analysis evaluations on all major infrastructure projects contained in the current Metropolitan Strategy to ensure that the most effective and efficient expenditure of public funding is achieved – a role for Infrastructure Victoria.

- Exploring alternative forms of funding major projects, including Private Public Partnership, to extend the reach of public funds.

Planning horizon

As submitted in Council’s original submission to Plan Melbourne, the planning horizon for Plan Melbourne should be extended beyond 2051, ideally to the next 100 years, but at least to the 60-90 year horizon recommended by the 2008 report of the Audit Expert Group on Melbourne 2030, to increase the scope of the long-term planning of infrastructure maintenance and renewal.

Delivery of community infrastructure – early years facilities

Delivery of community infrastructure, early years facilities in particular, is essential for new communities. Whilst local government can control the sequencing of delivery of community centres, where such centres that incorporate early years hubs are co-located with schools, there is often a lag between when the community centre and kindergarten facilities are delivered and delivery of the school buildings. This limits integration opportunities. Whilst it is understood that school funding is subject to State Government budget processes, it would be desirable that delivery timelines are better aligned.

PSPs show the location of future community infrastructure, however, opportunities to master plan community precincts are limited and not necessarily prescribed in the PSP.
Housing Density and Diversity in Growth Area PSPs

Housing density targets in growth area PSPs are generally low (17 dwellings per hectare). More extensive use of TOD principles along principal transport routes, in particular along the new Regional Rail Link corridor, is an opportunity to deliver better urban design outcomes and improve walkability in growth areas. Developers should be encouraged to deliver higher density housing close to major transport nodes early in the PSP development, or mechanisms should be identified that enable the preservation of land surrounding future railway stations to ensure that residential development around them can be built at a much higher density than would be proposed otherwise. Where the latter approach is used, it is important that interim land uses do not compromise amenity and community safety in the meantime.

<table>
<thead>
<tr>
<th>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:</th>
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Please explain your response:

It is noted that the United Nations Sustainable Development Goals (UNSDGs) comprise 17 goals and 169 associated targets.

One view is that all 17 of the goals are relevant. Whilst developed countries such as Australia meet or exceed many of the UNSD goals, Australian cities still have a long way to go to ensure that outcomes such as Gender Equality, Affordable and Clean Energy, Reduced Inequalities, Sustainable Cities and Communities, Responsible Consumption and Production, Climate Action, Life Below Water, Life on Land, Peace Justice and Strong Institutions and Partnership for the Goals still require ongoing and concerted effort and attention.

A qualified position submitted by this response is that specific reference should be made to the most relevant goals and targets to be observed by a metropolis of the scale and maturity of development of Melbourne, i.e. Goal 5 (Gender Equality); Goal 11 (Sustainable Cities and Communities); Goal 13 (Climate Action); and Goal 15 (Life on Land). This could be facilitated by a gap analysis against the UNSDGs. Such an approach would help to focus concentration on areas that require further attention.

This submission strongly agrees with Plan Melbourne Refresh being aligned with the UNSDGs, however, for this to have a meaningful application to Melbourne’s continued development as a sustainable and livable city, specific reference should be made to those aspects and targets that require focused attention.
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:**

It is considered imperative that the current Urban Growth Boundary be locked down as intimated in the Discussion Paper to protect the remaining ‘green belt’ of ecological values, as well as agricultural land, natural resources, and state infrastructure from urban encroachment. As identified in the Discussion Paper, the remaining green belt should not be regarded as “vacant land awaiting urban development”.

A permanent UGB promotes efficient use of existing community and transport infrastructure within the UGB and limits speculation of land uses both inside and outside the UGB and in the longer term mitigates against spatial disadvantage between the urban fringe and the middle and inner ring suburbs. There are environmental, social, economic costs associated with an adjustable urban growth boundary.

There is currently more than ample land supply for residential development. Based on a conservative average density of 15 dwellings per hectare and average construction of 3,000 new dwellings per annum, Wyndham has over 30 years residential land supply. A significant challenge in managing Wyndham’s growth is that it is developing along multiple growth fronts with 34 active residential estates developing simultaneously, resulting in an inefficient roll out of infrastructure. This would be further exacerbated if the UGB was allowed to be expanded incrementally with the current abundance of residential land supply.

A contrary view is that the UGB should not be the driver. If Plan Melbourne achieves its density and city shape goals, the UGB is less necessary and is used as a fallback instead. The protection of land for agriculture and environment should be the priority rather than an arbitrary boundary that can never be breached. It has also been argued that what needs to be kept in mind is if we end up with dormant island communities outside of the Urban Growth Boundary where people still commute into Melbourne for work, this places an increased strain on infrastructure than if these communities were an extension of the current urban area. What has not been considered in this counter argument is the transformation of the shape of Melbourne away from the ‘starfish’ footprint advanced by Rupert Hamer in the 1960s along radial transport corridors that allowed the metropolis to evolve within the framework of its inherited natural environment. Instead nature is pushed out to the periphery with the former green wedges receding into the metropolis’s green belt.

A further converse position has been to designate certain defined outcomes that would trigger a review into the UGB. Areas that were outside of the UGB that then become part of the UGB should command a significant one-off payment for infrastructure on the sale of the land due to the significant increase of land value that occurs from the zoning change. However, recent history has shown that the value capture from the Growth Area Infrastructure Charge has been minimal (representing only 15% of State Infrastructure costs associated with servicing new residential land).

For the above reasons, this submission strongly agrees with Option 7 – lock down the existing urban growth boundary, which is understood to have bipartisan support.
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?

Agree with the option to more clearly articulate the values of green wedge and peri-urban areas to be protected and safeguarded. This can be assisted by a mapping of the areas to be protected.

More importantly, clarity needs to be sought on how these values are to be protected, and what the appropriate interface between development and green wedge land uses should be.

Expressing the values of green wedge and peri-urban areas is one thing, giving the planning community direction as to how to achieve this protection is more important (and should not be left to interpretation).

In effect, it is the degree of protection that articulates the value. A moveable UGB and lack of policy on the treatment of interface between the urban edge and the green belt suggests that the land is only valued for its green wedge and peri-urban qualities until it is needed for another use (“vacant land awaiting development”).

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 current “Integrated Economic Triangle” map has its shortcomings, it is critical that Plan Melbourne Refresh adopts a map or series of maps that adequately represent the total dynamic of the Melbourne metropolis as a city region and global trading city.

Firstly, at a regional scale, it is imperative that the metropolis be represented as a settlement around Port Phillip. This could be accentuated by the circumnavigation of the Port Phillip Bay Trail. The plan needs to show the current transport link across the heads via the Queenscliffe – Sorrento Ferry. It needs to show the radial road and rail network that serves the surrounding arc of regional cities, highlighting that 89 per cent of Victoria’s population resides within 150kms of the Melbourne CBD. Related to the latter is that the concept map should show the relationships between the outer areas of Melbourne and proximal regional centres (e.g. Werribee – Geelong, Melton – Ballarat, Sunbury-Bendigo etc).

The plan ought to also show the reach of the Port(s) of Melbourne to the planned inland ports and into regional Victoria, NSW, South Australia and Tasmania. With regard to the latter, Plan Melbourne should re-examine the most appropriate location for Melbourne’s secondary port. The spatial logistic pattern of the metropolis suggests that it should be in the western part of Port Phillip, not Hastings. This review should also consider the Logistics City Concept developed by Victoria University in 2008 to maximise the economic cluster of the logistics industry located in the western quarter of the Melbourne metropolis. The Plan also needs to highlight that the metropolis is served by two curfew free international airports, Melbourne (Tullamarine) and Avalon.
National Employment & Innovation Clusters, Metropolitan Activity Centres, Principal Activity Centres, Health and Education Precincts and Urban Renewal Precincts should also be identified.

Identification of major open space and environmentally significant areas would also be desirable i.e. including elements of Map 26 in Plan Melbourne 2014 – ‘Open Space, Natural Features and Biodiversity Conservation’.

The series of plans should also identify the location of Melbourne’s water supply assets, including the Desalination Plant, and the major sewage treatment facilities (i.e. Western Treatment Plant and Eastern Treatment Plant) which have a capacity to serve as secondary dams of recycled water supply.

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:

This submission strongly agrees with the concepts of the polycentric city and 20 minute neighbourhood. A significant opportunity exists to leverage the $4 Billion investment already made in the Regional Rail Link project as a significant driver of the 20 minute neighbourhood approach. The implementation of the 20 minute neighbourhood concept into the spatial distribution of Wyndham is strongly supported by the Regional Rail Link corridor and will expand affordable living options and housing diversity opportunities with excellent access to job rich locations averting the development of a divided city. It can also facilitate enhanced utilization of activity centres and future employment hubs at the centre of 20 minute neighbourhoods along the Regional Rail Link corridor.

The challenge, however, is how you implement this in the preliminary development (early years) of growth areas. There are examples in currently developing estates where you could currently walk for 20 minutes and not be able to access a school or shops. Greater density around key transport routes will help. However, many gazetted PSPs will not be able to achieve this aim as density guidelines have not been mandated around railway stations and activity centres. Attempts to do so were not supported in the tranche of PSPs delivered in 2014 in Wyndham West and Wyndham North. The issue of appropriate residential densities has been left to the market place within the context of applied land use zones. PSPs may require amendment should Plan Melbourne Refresh seek to introduce density guidelines to facilitate higher densities around transport nodes, in particular along the new Regional Rail Link corridor, and around activity centres. Rezoning of existing or proposed residential areas may be required, as well as rethinking co-location and existing support for integration of community facilities, i.e. large early years hubs as opposed to smaller standalone centres within walking distance of families.

Under housing policy, densification is recommended in areas where attributes of a 20 minute neighbourhood already exist. Encouraging additional population in areas planned for a certain density increases the demand on that infrastructure/service. Additional consideration needs to be included regarding open space contribution and community facility provision. This could be addressed by the previous proposal to introduce standard development contributions for new development in located established areas.
Distance to employment was probably the most important aspect of the 20 minute neighbourhood communities. There needs to be an option included to address distance to work and education as this is the most commonly travelled trip for most people. Bringing jobs (not including retail) closer to residential areas and residential areas closer to jobs is an extremely important aspect when considering the shape of the city. Maximising the opportunities of the new Regional Rail Link corridor and existing metropolitan rail network by the early delivery of railway stations is critical in this objective. As noted above in Section 1, it is iterated that:

- All National Employment Clusters should be serviced by excellent public transport availability. From a West Port Phillip perspective, the concept of the polycentric city and constellation of National Employment Clusters needs to acknowledge and embrace the dynamic of the new Regional Rail Link, existing metropolitan rail network, and future Avalon Rail connection that will bring people and jobs closer together within acceptable commuter travel time distances between Geelong CBD – Avalon Airport – East Werribee National Employment Cluster/Werribee City Centre – Sunshine National Employment Cluster – Footscray – Melbourne CBD.

- A significant outcome of the new Regional Rail Link corridor in Wyndham is that upon the completion of all proposed future railway stations and associated connecting spur line joining the RRL and metro rail corridor, 95% of Wyndham’s urban development will be within 3km of a railway station. The early delivery of the proposed stations is as important as the current grade separation program to improving the productivity of the Melbourne metropolis.

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:

This submission agrees with climate change, people place and identity and partnerships with local government as key concepts that need to be incorporated into Plan Melbourne.

Housing - Affordability and Diversity

Council’s position on housing affordability and diversity is outlined in its submission to the recent Senate Committee Inquiry into Housing Affordability, which is incorporated into this submission as an appendix via the following link:

The submission made by Wyndham City to the Senate Committee Housing Inquiry contained the following 10 recommendations:

1. Data analysis on housing affordability should be disaggregated in terms of growth area municipalities and non-growth area municipalities, alongside any other types of analysis.

2. Use of the term ‘housing affordability’ requires careful consideration when it is observed that, increasingly, less expensive housing is located in areas of low living affordability. In Wyndham, much ‘affordable housing’ is evidently unaffordable, evidenced by high eviction rates. Wyndham City also recommends broader use of the term ‘housing vulnerability’.

3. Allocation of resources for services that support people to maintain their housing should be based on current needs – focusing on inclusivity and livability at the community level – as opposed to historical approaches focused on inner city locations and at the metropolitan level. This should also include increased support in growth areas for services that address ‘pathways’ into homelessness – such as family violence, youth services, mental health, alcohol and other drugs.

4. An enforceable housing diversity target by the number of bedrooms is needed for growth areas to ensure that a diverse housing stock is delivered to meet the needs of current and future communities.

5. Further research should be undertaken into the role of market drivers in the delivery of housing diversity, including how regulatory and incentive-based approaches can assist Councils to advocate for housing diversity in new developments.

6. Mandated affordable and social housing targets and inclusionary zoning need to be introduced for real action and progress to occur.

7. The National Rental Affordability Scheme should be revived and growth areas included as priority areas for investment in all rounds.

8. Immediate action should be taken to address the absence of crisis accommodation in Wyndham.

9. Greater recognition and support for local government in providing housing vulnerability responses should be realised in future intergovernmental agreements and arrangements.

10. Greater support should be provided for integrated regional approaches that combine prevention and crisis responses based on innovative hub models such as that represented by the proposed H3 Wyndham Crisis Facility.

Consideration should also be given to the findings and range of recommendations of the Inquiry of the Senate Economics References Committee’s Report entitled “Out of reach? The Australian housing affordability challenge” (May 2015). This report has found a worsening of housing affordability as is reflected in declining home ownership rates. The Senate Committee has made a number of recommendations directed primarily toward improving home purchase affordability. The Senate Committee believes governments have a legitimate role, and indeed a responsibility, to use policy interventions to improve the efficiency, efficacy and, critically, the affordability of the housing market. The recommendations include “state governments phasing out conveyancing stamp duties, to be achieved through a transition to more efficient taxes, potentially including land taxation levied on a broader base than is currently the case. Other recommendations are directed at improving the efficiency, effectiveness and equity of infrastructure funding arrangements, which can have a strong influence on the cost of housing. Similarly, a number of recommendations are made with the
intention of ensuring land supply, urban planning and zoning processes have a positive effect on housing affordability.”

The report warns that policy interventions that add to demand without addressing or at least accounting for supply-side constraints risk inflating house prices and exacerbating affordability problems. Hence, direct grants to home owners, including First Home Owner Grants, need to be targeted carefully in order to be effective. The report believes that shared equity programs are a promising means of helping more Australians become homeowners, and consideration should be given to expanding such programs. The Committee also recommended the exploration of programs that help older Australians ‘age in place’ when they want to, or downsize (or ‘right size’) to meet their needs.

The Senate Committee also heard evidence that renting must be recognised as a mainstream, and for some, a permanent form of tenure in Australia’s housing system and must be placed on Australia’s national policy agenda as a key issue to address poverty. Further highlighted was the impact of existing tax arrangements for investment housing, in particular, negative gearing and the capital gains discount, which point to the need for a national approach to affordable housing as many of the key levers that shape the Australian housing market and housing affordability rest with the Commonwealth Government. Hence, there needs to be an acknowledgement of the significant non-planning influences on housing affordability.

An important direction from the Senate Committee is that the Council of Australian Governments (COAG) may provide the ideal structure within which the Commonwealth and states and territories can work together with representatives from key government agencies, the not-for-profit organisations, industry bodies and associations, academics and other housing experts.


Social Housing

Social housing makes up 3.8% of all housing in Victoria, however, in Wyndham this rate is 1.4%. As a general goal, Wyndham City supports the aim for social housing provision in growth areas to seek to achieve parity with the Victorian state average. In Wyndham, this represents a requirement for a total of 4,109 future social housing units in the municipality’s growth areas alone over the next 25 years. Wyndham’s rate of social housing provision is, however, declining. Increasing supply of social housing assists people who have difficulty entering the private rental market (i.e. a prevention measure) as well as being an ‘exit’ from homelessness. However, housing support services and other local governments note the difficulty of attracting social housing providers to outer metropolitan areas.

The facilitation of more affordable housing may need to go beyond incentive based planning models. A recent national survey found a third of local governments enforced targets in planning strategies. Direct action, in particular inclusionary zoning, such as the models introduced by the South Australian and the Australian Capital Territory governments that nominate a specified quantum of affordable housing in all new significant residential developments, should be considered. Successive rounds of the National Rental Affordability Scheme have delivered some gains in increased supply of affordable rental accommodation. This scheme should be revived and growth areas included as priority areas for investment in all rounds.
People place and Identity

Wyndham City has a District Planning model with District Advisory committees whose role it is to provide local input to Council decision making on a place-based basis.

**Option 16** on better recognition of the contribution of Aboriginal values and perspectives to the planning of built and natural environments is strongly endorsed.

Wyndham’s Statement of Commitment and developing Reconciliation Action Plan is an example of how local government can work in partnership with local Aboriginal communities.

Planning is underway to deliver a Wyndham Aboriginal Community Centre. This is a tangible expression of Wyndham’s commitment to work alongside its Aboriginal community and to provide culturally inclusive spaces and services.

**Option 17**, recognising and reinforcing the importance of partnership with local government in sub-regional planning and implementation of Plan Melbourne 2016, is strongly supported. Wyndham Council sees a very strong role for a partnership approach to the development of activity centres and employment clusters. The Council is establishing governance structures which will engage and involve the businesses and property owners within the centres, recognising that the combined strength of a council working with businesses and property owners towards a common vision is much stronger than what any of these parties can achieve independently. This approach builds on the Business Improvement District approach that has successfully being rolled out on the UK and USA, and mentioned as an area for evaluation in the Victorian State Government Budget papers 2014-15.

The success of a centre or a cluster will require much more than simply a set of planning provisions. Success relies equally on business development, marketing, strategic positioning, economic development and development facilitation. For this reason it is hoped that the state Government Department of Economic Development, Jobs, Resources and Transport can be engaged to a much greater degree in the implementation and delivery of Plan Melbourne initiatives.

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

City shape should be focused on new and existing major transport infrastructure.

Key future transport infrastructure must also be considered for a change in the urban environment. For example, the new Regional Rail Link between Geelong and Melbourne, via the City of Wyndham, should be taken advantage of to ensure a high Return on Investment for the infrastructure and to reduce travel times for all residents. (See Map 1)

Changes to the Building Code and other legislation is required to enable climate change responses involving housing.
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?

The benefits that flow from the concentration of activities within a Cluster could be highlighted (e.g. cross pollination of ideas and energy supporting innovation, increased attractiveness of a large Cluster to business/increased economic strength). The advantage of clusters having more direct connection and accessibility to their surrounding regions, businesses and population could also be accentuated.

Regarding the latter, the rail spur line connection between the Regional Rail Line and the metropolitan Rail Line in Wyndham (as per PAO6 in Wyndham Planning Scheme Map 14 Public Acquisition Overlays - http://planningschemes.dpcd.vic.gov.au/__data/assets/pdf_file/0006/195405/wyndham14pao.pdf is an essential connection for improving accessibility between Geelong and the Werribee City Centre/Werribee National Employment Cluster. Also important is the delivery of the proposed Derrimut Road Station to improve rail connection to the Werribee NEIC.

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:

Wyndham City supports Option 21B with some qualification.

Looking beyond the core institutions and businesses is important in planning for the growth of a National Employment and Innovation Cluster (NEIC).

Infrastructure is a key aspect that needs to be addressed, and this would not be picked up if the focus was on institutions and businesses alone. A case in point is the current development of the Sneydes Road diamond interchange and proposed future Derrimut Road rail station to improve transport access to and from the East Werribee NEIC. State Government must play a key role in facilitating the delivery of infrastructure for these clusters, but with appropriate input and guidance being provided by local government.

There also needs to be a protection against the provision of basic employment in the NEICs that
could easily be provided in other areas. Hence, a degree of concentration is still required on the
development of the core institutions and businesses that define the key theme(s) of the
NEICs. Having too large a boundary or too large an approach can have the effect of diluting available
resources and investment.

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?

Wyndham City Council strongly agrees with the idea to broaden the East Werribee National
Employment Cluster and to call it the Werribee National Employment and Innovation Cluster in order
to encompass the full range of activities and employment activities that make up Werribee. East Werribee and the Werribee Activity Centre, while each having their own unique characteristics, are interconnected. This interconnection should be recognized by the inclusion of the two areas in the Cluster. East Werribee is also interconnected with the Hoppers Crossing Town Centre via the Hoppers Crossing Station link. Hence, the Hoppers Crossing Town Centre should also be embraced within the boundary of the Cluster. Within the cluster these individual centres should still be recognized in their own right.

The Werribee City Centre has established infrastructure, a railway station, extensive commercial
development land (Activity Centre Zoned) ready for development, parking, established businesses, cultural, community and retail activities and a unique environmental location on the banks of the Werribee River, in the heart of Melbourne’s fastest growing area, the Wyndham Corridor. Its status should be elevated to that of a Metropolitan Activity Centre, as per the Sunshine NEIC and the Dandenong NEIC which have adjunct MACs. This is an important and critical dynamic for the successful development of the Werribee NEIC in attracting further knowledge based innovation enterprise. It is considered that the development of the Werribee City Centre as a focus for regional commerce, specialty retail, entertainment, leisure, and community services in the immediate and short term will assist East Werribee to achieve its longer term potential.

It also needs to be emphasised that State Government planning and management authority should be focused on the core area of the NEIC (East Werribee PSP) and not be extended to include the Werribee City Centre and Hoppers Crossing Town Centre. Council, places great significance on its role as the planning and development authority for the Werribee City Centre as a key component of its role in the future development of the Werribee City Centre.

Finally, inclusion of the Werribee Park Tourism Precinct, including Werribee Zoo, within the boundary of the Cluster is not recommended as it is geographically separate from East Werribee and the Werribee Activity Centre. However, its proximity to the NEIC should be acknowledged, as should the Werribee International Horse (Quarantine) Centre at the Werribee Race Course, which help to define the animal science innovation theme associated with the location of the Melbourne University Veterinary Science Precinct. A lateral reference should also be made to the Werribee South Intensive
Agriculture area to emphasise the Agricultural Science and Technology precinct within the Cluster. A map has been prepared to show how the boundary of the Werribee NEIC may be represented. (See Map 3)

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?

No comment is offered on the naming and boundaries of the Dandenong South NEC. However, it is observed that Dandenong South National Employment Cluster has the adjunct of the Dandenong Metropolitan Activity Centre. On the basis of this precedent and Sunshine, which has also received dual designation as a MAC and NEC, a similar co-designation is warranted for Werribee / East Werribee. No Metropolitan Activity Centre has been nominated in the outer west. The Werribee City Centre requires a MAC status to strengthen the potential of the Werribee-Geelong corridor and ensure a balanced network of polycentric nodes in the Melbourne metropolis.

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?

Regarding Option 24, update of the designation of activity centres, Table 1 and Map 8 of the Metropolitan Melbourne Structure Plan need to be amended to remove the anomaly of the Werribee City Centre not being recognized as a Metropolitan Activity Centre. Justification for this is presented in Section 12 above.

Regarding Option 25, Wyndham City supports the submission of Melton City to retain Future Emerging Metropolitan Activity Centre status for Toolern as this is an important catalyst for the attraction of investment and development of Toolern as an additional employment centre for Melton.

Regarding Option 26, Wyndham City supports the recognition of the Truganina Activity Centre which was overlooked in the hierarchy of activity centres recognized by Plan Melbourne.

Regarding Option 27, with respect to the separate listing of emerging activity centres, it is important that these also be mapped in Plan Melbourne in conjunction with the location of existing activity centres to facilitate the spatial planning of 20 minute neighbourhoods in the growth areas and to ensure that these sites are not undermined by the overdevelopment of other centres. This is
particularly important in a growth area context such as Wyndham.

Regarding Option 28, It is unclear from the wording what exactly is intended by Option 28. Wyndham City does not support proposals for the removal of floorspace guidance for retail and office development in growth areas. Floorspace guidance is a recognised planning tool to support and protect developing activity centres in Precinct Structure Plan areas. Currently a significant challenge exists in supporting the establishment of new growth area activity centres that are located in close proximity (in some cases opposite) to established urban areas where retail floor space is unregulated. The establishment of activity centres in new growth area communities is a critical element of the 20 minute neighbourhood concept. It is proposed that the tool of retail floor space guidance be permitted to be applied across both PSP areas and established areas within Growth Area municipalities, as necessary, to support the establishment of emerging activity centres in new residential communities.

Regarding Option 29, Wyndham City supports clearer activity centre policy and the drafting of a practice note for identification and establishment of new activity centres based on the final criteria included in Plan Melbourne, provided that such criteria addresses the support of emerging activity centres in growth areas.

Regarding Option 30, Wyndham City supports modifying the criteria for identifying new activity centres to explicitly include reference to meet identified market gaps and to contribute to the delivery of the 20 minute neighbourhoods.

As the criteria for identifying new activity centres and associated practice notes for same are yet to be released we request the opportunity to be consulted and comment on these before they are introduced.

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?

As emphasised by , former Acting Director of Planning, MMBW, in history of Melbourne’s Green Belt and Wedges (2005), one of the most difficult problems in protecting strategic agricultural land is at the fringe of the defined urban area where pressures will always exist to rezone the land. What is required are special measures. A “permanent” rural zone or “permanent” Urban Growth Boundary can only be effective provided it is firmly accepted by the community and successive governments and provided that land values in accordance with its existing use can be established. Hence, the locking down of the UGB is a critical first step. The notion of adjustable urban growth boundaries tends to fuel land speculation that raises the value of land beyond agricultural land use.

Unfortunately, as is supported by history, planning policy alone is inadequate. points to complementary solutions such as public acquisition of large tracts of land and leasing it for the purposes envisaged in the non-urban area, and/or acquisition of the potential development value in the land thus leaving it specifically with the existing use value.

It is also crucial that the sustainability of farming be maintained. Critical considerations in this regard are the security of water supply, quality of supply (appropriate salinity levels) and appropriate water pricing. Government action is required to deliver these outcomes including fast tracking of
modernisation of the water network to address current seepage losses (as high as 47% in the Werribee Irrigation District), a review of current water pricing arrangements, especially where water is not received on farm; integrated water grid management across the whole water supply network; and assistance/exit strategies for farmers during unviable periods.

It is also noted that Victoria currently has no established policy on the separation of agricultural precincts from urban encroachment or right to farm legislation as do other states, in particular Queensland, Western Australia and Tasmania. The important food production areas around Melbourne should be mapped for long term protection, and planning guidelines should be introduced to manage the separation of agricultural and residential land uses to inform how the green edges to Melbourne may be strengthened. These guidelines are necessary to inform future precinct structure plans, in particular, Aviators Field in Wyndham, which borders the Werribee Irrigation Intensive Agriculture Precinct. A whole of government policy approach is required.

Also critical is the implementation of the various recommendations of the 2010 State Parliamentary Inquiry into Sustainable Development of Agribusiness in Outer Suburban Melbourne. It is also worth reviewing the findings and recommendations of the 1977 MMBW Metropolitan Farming Study by Aberdeen & Hogg, which... cites as “the most valuable reference for any review of planning procedures relating to non-urban areas”.

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?

Transparent buffers and more guidance on appropriate interface treatments around quarries and waste management and resource recovery facilities are critical to protecting such facilities from urban encroachment. The State Government needs to continue to support current initiative 5.8.1. Separate Waste Management and Resource Recovery Facilities from Urban Encroachment and Assess Opportunities for New Waste Management Facilities.

The State Government is still yet to update the Growth Corridor Plans affected by the 2010 Logical Inclusion Urban Growth Boundary Review. The update of the Growth Corridor Plans is critical to the mapping of quarry sites and waste resource recovery facilities and the designation of appropriate land use zones to inform future Precinct Structure Plans.

Wyndham City has conducted a buffer study (Environmental Audit Report) to assess the impact of potential encroachment of the most recent Urban Growth Boundary on current quarry and landfill sites along the western growth front of the municipality. This report can be made available to the Extractive Industries Taskforce.

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

Distance to jobs is critical. There needs to be a plan to ensure employment areas are well connected by public transport and located in locations that are efficient and benefit residents. A suggestion could be to identify the catchment for residential areas where an appropriate number of jobs are planned/required to service that population.
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
- [x] Strongly Agree

**Why?**

Wyndham City strongly agrees with the Principal Public Transport Network (PPTN) informing land use choices and decisions. The leveraging of the $4 Billion investment in Regional Rail Link is in part premised on the capacity and opportunity this component of the PPTN provides. The PPTN also needs to inform other infrastructure provision. Also the identification of the capacity of the components of the network need to be recognised. (Melbourne Metro tunnel will carry more people per hour than a PPTN bus route in Wyndham.)

The location of the PPTN has informed the identification and designation of “substantial change” areas in the Wyndham Housing Strategy.

The preliminary response from DELWP to Recommendation 10 of the Ministerial Advisory Committee nominates the designation of strategic public transport corridors as being out of the scope of Plan Melbourne Refresh (see page 99 of Discussion Paper). This appears to be inconsistent with the strategic importance placed on public transport corridors by Option 34.

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?**

As well as neighbourhood shared pathways, continuous safe cycling and walking paths along major transport corridors are needed, together with adequate provision of cycling facilities at stations and other key destinations.

The walking and cycling network must connect to the PPTN, open space, community facilities, schools, employment and services and retail. This also ties in to the 20 minute neighbourhood concept.

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

**Principal Freight Network**

Need to mention implementing the Principal Freight Network under the freight section.
Principal Pedestrian and Bicycle Networks

Given the importance of the 20 minute neighbourhood concept, the Active Transport section needs to discuss the development of the Principal Pedestrian Network, as well as the Principal Bicycle Network.

Complete missing Werribee-Geelong link of Port Phillip Bay Trail

The importance of the completion of the Port Phillip Bay Trail, i.e. the Werribee –Geelong missing link, has been overlooked once again. This is a low cost infrastructure item that, in addition to promoting cycling in Melbourne, has the potential to create a new eco-tourism opportunity for Melbourne that has global appeal, help market Melbourne as a metropolis around Port Phillip, and deliver further tourism activity around the whole circumference of the Bay.

Connection of Greenfield growth areas

There needs to be a strong focus on increasing the connectivity of large redevelopment areas such as the new greenfield growth areas, Fisherman’s Bend, etc.
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?

Targets can lack nuance and a spatial balance.

While the intent of the 70/30 target is appreciated, i.e. that established areas need to take a greater load in the housing of Melbourne’s future population, planning decisions regarding the location of housing need to be more sophisticated than the application of an arbitrary aspirational target. Where to locate new housing supply must also be informed by the spatial pattern of Melbourne’s radial rail network which brings some “outer” growth areas within a 12 to 34 minute reach of job rich areas. A case in point is access to the recognised job rich centres / National Employment Clusters of Geelong, Sunshine, Footscray and Melbourne CBD from the Wyndham Regional Rail Link stations and Werribee metropolitan line. As noted above, when all stations are eventually delivered, 95% of Wyndham’s urban suburbs will be within 3km of a railway station. Urban areas like Wyndham have a greater capacity to deliver affordable housing and affordable living across the spectrum of socio-economic demographics of the metropolitan population. The market value of land in the inner and middle suburbs limits the delivery of affordable homes for family households and low income earners. Pressures against the redevelopment of inner and middle suburbs towards higher densities will also impact on the capacity to deliver on this target, unless the State Government is prepared to challenge the extent to which the Neighbourhood Character Zone has been implemented across the inner and middle suburbs. Housing supply options could be widened to embrace opportunities available in the regional towns within the 150km arc of the Melbourne GPO which one can travel to and from on the Myki Pass network (i.e. Geelong, Ballarat, Bendigo, Seymour, Warragul, La Trobe Valley).

The focus should be on where is the best location for new housing rather than meeting numerical targets. The focus as discussed above should look at other aspects, such as the location of jobs, open space, existing or planned transport etc. It is the design, location and density of housing that is more important than whether it is infill or not. In addition, if infill housing puts excessive strain on particular infrastructure where greenfield housing doesn’t, then the latter may be a preferred option.

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

Rezoning will be necessary in many areas, particularly in the inner and middle suburbs that have vastly adopted the Neighbourhood Residential Zone.

Covenants restricting lots to single dwellings also need to be removed in many recently developed areas.
Introduction of Development Contributions in established areas to fund additional infrastructure related to higher residential densities, i.e. community infrastructure, including open space, in infill areas linked to the degree of development permitted. Such contribution would be used to:

a) purchase land (in proximity to development – 400m),
b) embellish existing open space to facilitate more intensive use (in proximity to development – 400m) and/or

c) embellish higher order (district level or above) open space for more intensive use (in proximity to development – ~ 2500m).

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?

Sequencing of Development

Plan Melbourne Refresh makes reference on page 49 to a “Government Managing Growth Plan which sets out a plan for delivering coordinated infrastructure across Melbourne’s outer suburbs”. The preparation of such a plan is applauded, however, it is yet to be released for consultation with outer growth areas. Wyndham City has its own Residential Growth Management Strategy which is currently under review. A copy of the revised Wyndham Residential Growth Strategy will be provided as soon as it is adopted by Council. It is hoped that an opportunity will be provided to input into the Government’s Growth Management Plan prior to the finalization of Plan Melbourne Refresh.

Dwelling density in remaining PSPs

While Plan Melbourne Refresh’s proposal to increase average dwelling densities from 15 dwellings per hectare to 25 dwellings per hectare is supported in principle, the application of densities should relate to the location of the public transport network and activity centres and be guided by municipal housing strategies.

Wyndham City has recently completed its Wyndham Housing & Neighbourhood Character Strategy (September 2015) (See - http://www.wyndham.vic.gov.au/building_planning/town_planning/housingandneighbourhoodchar acerstrategy/housing_adopted_strategy/housing_and_neighbourhood_character_strategy_2015 ) which provides a framework to guide the growth and change of residential areas in the municipality. The strategy includes a housing framework plan that delineates and describes areas for substantial, incremental and limited change. These areas will provide the basis for the application of new residential zones, and other planning controls as appropriate.

Further, density guidelines need to be introduced not only in future PSPs, but also in recently gazetted Precinct Structure Plans that are currently silent on the designation of densities around railway stations and activity centres. This is particularly important for PSPs along the Regional Rail Link, otherwise the $4.3 billion expended on its construction will be a squandered opportunity.
Density guidelines were proposed in a series of Precinct Structure Plans in Wyndham West and Wyndham North but were removed.

There needs to be a mechanism to preserve land surrounding future railway stations to ensure that residential development around them can be built at a much higher density than would be proposed otherwise. As an example, developers are generally only constructing standard residential densities close to future station sites as there is no funding commitment or timing on when stations will be constructed. Once the station is built in the future, there will be few opportunities to develop higher densities within a 20 minute walk of the station from a base of average lot sizes of 417 m2. Such lots also tend to be the subject of covenants that restrict future densification of lots. The State Government needs to ensure (like Queensland has under Sections 87 and 349 of its Sustainable Planning Act 2009 - [https://www.legislation.qld.gov.au/legisltn/current/s/sustplana09.pdf](https://www.legislation.qld.gov.au/legisltn/current/s/sustplana09.pdf)) that covenants do not undermine the objectives of the State’s planning objectives. Information on the extent of the use of covenants in Wyndham is contained in Council’s submission to the Senate Committee Inquiry into Housing Affordability, which is appended to this submission (Appendix 1, p.14). Further detail is outlined in ‘Section 5.4 Covenants, p.90-91’ and ‘Appendix D’ of the “Wyndham Housing & Neighbourhood Character Strategy Issues and Opportunities Paper (August 2015)” which can be downloaded from Wyndham Council’s website: [http://www.wyndham.vic.gov.au/building_planning/town_planning/housingandneighbourhoodcharacterstrategy/project_background](http://www.wyndham.vic.gov.au/building_planning/town_planning/housingandneighbourhoodcharacterstrategy/project_background)

An exception to the above standard approach of development around railway station sites exists in Williams Landing where the site of a current large hardware retailer in Williams Landing has the capacity to be converted in the future to mixed use development near the Williams Landing railway station, but this will not be until the end of the life of the existing use.

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
- [x] Agree
- [ ] Strongly Agree

Why?

Unlocking housing supply in established areas definitely needs to be a component. Whether ‘focus’ is the correct word is debatable though. There are many important components that need to be balanced rather than a single focus. Please refer to comments made under Section 20 above.

Consideration also needs to be given to preventing the subdivision of growth areas from being fragmented to the extent that lot layout would prevent future high density growth.
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
- [x] Other

Why?

A Housing Strategy Plan incorporating housing targets based on the spatial pattern of Melbourne and access to job rich areas via the PPTN and support of the 20 minute neighbourhood concept may produce a more comprehensive approach. A case in point is leveraging of the $4 Billion investment in the Regional Rail Link as outlined above in Section 17 and illustrated in Map 1. Such a strategy requires a whole of government response.

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 commented above, the policy should be based on a spatial analysis of the location and access to jobs, open space, activity centres, and existing or planned transport. It is also paramount that the identification of those locations in which higher scales of change are supported by a neighbourhood character and housing strategy assessment, such as the one recently completed by the City of Wyndham. The Wyndham Housing and Neighbourhood Character Strategy provides a 20 year plan to manage housing growth and change within the municipality. It identifies and Designates limited change, incremental change and substantial change areas. It estimated that approximately 64,000 to 76,000 additional dwellings are required over the next 20 years to meet the demands of the City’s growing and changing population. The analysis estimated that there is capacity for 65,700 new dwellings within the approved PSP areas alone. There is also potential for the development of approximately 61,000 new dwellings within the established residential areas.

Greater emphasis is also required on housing design – including how a development looks and its internal amenity. Pressure to maximise yield has led to smaller lots, larger footprints, no eaves, no articulation.
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?

Plan Melbourne should establish rigorous criteria for the conduct of Neighbourhood Character and Housing Strategies. It could also review the outcomes of such strategies via a government commissioned peer review of the Neighbourhood Character Studies conducted by each municipality.

The factors considered and balanced in determining the location of future housing in Wyndham included:

- Wyndham’s role in contributing additional housing to accommodate expected population growth in metropolitan Melbourne
- Maximising access to public transport and activity centres
- Protection of heritage and neighbourhood character values
- Protection of significant environmental and ecological landscapes
- Improving housing choice and affordability
- Diversifying the mix of housing types and sizes across the city
- Retaining a mix of residential lot sizes across the City

In Wyndham’s case, the designation of limited change areas has been restricted to environmental, heritage and neighbourhood character values, including maintaining a mix of residential lot sizes across the city. Substantial change areas have been identified along public transport corridors, around railway stations and PPTN bus routes and around activity centres.

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?

It is important to maintain flexibility. If a council contains much of its employment to its southern boundary and only has 40% of residential land, the council to the south would have residents that may have better access to those services than the council they are in. Also, a council area with significant open space or environmental areas or containing a major institution such as a significant university or industry cluster may have a different zoning mix.
The neighbourhood zone implies that only areas that have significant character should be protected and this is very subjective. Wyndham sees the value in protecting areas where there are large lots – as a form of housing diversity – and from restricting development in areas that are not well serviced (i.e. access is limited).

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?

This submission recommends Universal Design approaches in the Building Code, as has been previously investigated and proposed in Victoria.

To avoid reinventing the wheel, it is worth investigating the Life Time Homes Standard that was developed in the early 1990s by a group of housing experts in the UK who identified 16 Design Criteria that can be universally applied to new homes at minimal cost. (See http://www.lifetimehomes.org.uk/index.php)

It is understood from the above website that many local planning policies in the UK already require the Lifetime Homes standard in new developments. For example, the London Plan. It is an existing requirement in Wales and Northern Ireland for new publicly funded homes to comply with the Lifetime Homes Standard.

Another relevant web site from the UK is http://www.medway.gov.uk/pdf/evaluating-housing-proposals.pdf

Australian based web sites include sites established by Universal Design Australia (http://universaldesignaustralia.net.au/) and Livable Housing Australia (http://www.livablehousingaustralia.org.au/)

Prescriptions in the Building system are necessary as often optional elements are often never taken on board. Prescribed elements are factored into the cost.

Incentives such as faster approvals may assist.

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?

Wyndham City supports each of the above options (45A, 45B, and 45C) as measures for increasing
Plan Melbourne Refresh is also referred to the recommendations on desired housing outcomes contained in the Wyndham Housing & Neighbourhood Character Strategy adopted by Council in September 2015 (http://www.wyndham.vic.gov.au/building_planning/town_planning/housingandneighbourhoodcharacterstrategy/housing_adopted_strategy/housing_and_neighbourhood_character_strategy_2015 which further support the above options. Relevant recommendations in the Wyndham Housing Strategy include:

- Advocate to State Government to develop enforceable powers and controls for Council to set targets for the inclusion of small dwellings and extra-large dwellings in key locations (based on number of bedrooms and/or floor area). In particular continue to explore avenues to develop inclusionary zoning and other housing diversity targets into the Victorian Planning provisions and Wyndham Planning Scheme.
- Negotiate with the MPA and developers through the PSP process to ensure opportunities for incorporating high density development close to activity centres, public transport and along the PPTN are maximized.

With regard to the last bullet point, the ability to “encourage” is extremely limited without stronger guidelines and/or enforceable powers and controls.

A complete list of actions is contained in the Implementation Section of the Housing Strategy (pp. 26-85).

What should also be considered is the provision of services in conjunction with development of social and affordable housing, e.g. Youth Foyer Housing Project conducted by Hanover Welfare Services, the Brotherhood of St Laurence and the Kangan Institute which caters for the education, employment and housing needs of young people who are homeless or at risk of homelessness. The concept is one that originated in the UK and meeting the needs of 10,000 young people per year. (http://hanover.org.au/wp-content/uploads/2012/07/foyer_infosheet-final_26042012.pdf)

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

Affordable housing is not just a planning issue. (See section 7 above).
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?

The inclusion of Strategic Environmental Principles (SEPs) in Plan Melbourne as set out on page 70 of the Discussion Paper is strongly supported. However, these should be aligned with the United Nations Development Goals (UNDGs) which are also proposed to be referenced in Plan Melbourne. An important aspect to be drawn from the UNDGs and SEPs is how they should inform the spatial pattern and urban form of the metropolis.

An additional principle that should be incorporated into the SEPs is to identify and respond to prevailing climatic conditions as well as responding to climate change hazards. Plan Melbourne should convey an appreciation of the variation of climatic conditions, in particular rainfall, across the breadth of the metropolis which should be factored into urban planning processes (See Map 10). The use of climatic information is an important step in the design of sustainable cities. It would be appropriate to include a rainfall distribution map of the metropolitan region, which identifies the climatic urban design challenges of the west compared to the east in regard to vegetation management. Greening strategies for the west need to take into consideration species able to survive the low rainfall climate and soil conditions. The map also highlights the importance and need for water sensitive urban design and the development of alternative water supply to support a greening strategy. With regard to the latter, the metropolitan strategy should explore the extent of the potential for the re-use of water from the Werribee Treatment Plant, which as a result of treating over 50% of Melbourne’s sewage, transfers a significant volume of water across the metropolis.

An additional principle that should be considered within the SEP, are the principles of adaption and resilience such as the consideration of flexibility, resilience or planned redundancy to account for a range of climate futures that are likely to impact key infrastructure and land-use planning.

Map 10: Rainfall Distribution – Greater Melbourne

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?

This submission supports the utilization of planning tools such as overlays as they present a visual translation and transparency which will help people to interpret and understand the risks and consequences associated with climate change as well as the mitigation measures needed to respond to climate change challenges.

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?

This submission supports the periodical updating of the planning system and supporting legislative and policy frameworks to reflect best available climate change data. The current commitment through the Climate Change Act (2010) to provide biennial reports on the science and data relevant to climate change in Victoria is useful. However, this needs to build upon and be integrated with planning mechanisms. The State Government should establish climate information at the level required to inform government decision making and this should be a first step towards including climate projections into various state government design guidelines and legislation.

In particular, the Planning and Environment Act 1987 will be important when it comes to potential action to protect our coastal land for native vegetation outcomes under climate change. The Planning and Environment Act 1987 will heavily influence how Wyndham’s coastal vegetation can be protected in light of development pressures.

Wyndham believes that the Planning and Environment Act 1987, is key legislation that must be informed by climate change. Flowing from this change, climate change must also be incorporated into State Government design guidelines and planning policy, to ensure the communities we build today, will be appropriate for tomorrow.

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?

In many instances, council’s decision making would be improved if there was clear state direction on climate change, how the state was responding and which climate projections to use. This commitment enables local
governments to better align their action with action by the State Government, and will also help to build consistency within the climate change response. It also provides a consistent message that can be communicated to communities.

In this regard climate change hazards need to be identified by the State against an appropriate standard and resolution for land use planning decision making. For example high level “bath tub” modeling of future coastal inundation and hazards is not adequate for land use planning. Local coastal hazard risk assessments are required that account for local infrastructure, storm surge and erosion. The coastal hazard risk assessments must be applied using a consistent method across the State in order for planning and decision making to also be undertaken in a consistent manner.

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?**

As noted above, this submission strongly supports a more structured approach to climate change risk consideration in infrastructure planning. Local government would greatly benefit from State Government providing clearer direction on how to respond to climate hazards and updating of state government design guidelines. As discussed above, the first step in doing so requires provision of information at a scale and resolution appropriate to local government decision making, followed by alignment of actions between local and state government, supported by legislation. An infrastructure resilience test could be considered to support decision making.

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?**

This submission strongly agrees with the proposition of Option 52. However, follow through funding is required to Parks Victoria if the ‘planning’ under Option 52 is to become an actuality. Of particular concern is the current delay in acquiring the native grasslands in Melbourne’s west. Greater transparency in the acquisition process including the roll out of the Habitat Compensation program is needed so that local governments can keep their community up to date on progress of these key future environmental assets.
Commentary on the history of Melbourne’s Green Wedges

It is unfortunate that the growth of the metropolis was permitted to drift away from the “starfish” footprint advanced by Rupert Hamer in the 1960s along radial transport corridors, as this was the urban shape and form that was most aligned with UNSDG Goal 15, in that the former green wedges allowed the metropolis to evolve within the framework of its inherited natural environment. Instead nature has been pushed out to the periphery.

Map 11: Melbourne’s Green Wedges prior to Melbourne 2030 and Melbourne@ 5 million, reflecting Hamer’s starfish pattern

![Green Wedges Areas](source)


Map 12: Spatial transformation of Green Wedges to a Green Belt surrounding an expanded metropolis

![Spatial transformation of Green Wedges to a Green Belt surrounding an expanded metropolis](source)

Although it is not possible to restore green wedges within the expanded UGB, tendrils of habitat corridors along waterways, road reserves, and existing conservation open spaces can still play a vital role in preserving some of Melbourne’s remaining biodiversity. It is critical to strengthen the protection of remaining high-priority habitat corridors throughout Melbourne and its peri-urban areas to improve long-term health of key flora and fauna habitat.

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?

Options 53 and 54 are supported by this submission.

As submitted by Council in its original submission to Plan Melbourne, the impacts of heat island effect on community health put pressure on our health facilities, as well as impacting on our carbon footprint through the increased use of cooling systems. It should be recognized that the urban heat island effect is not just limited to ‘dense’ urban areas but is experienced in the suburbs of Wyndham.

Wyndham City conducted a localized thermal imagery flyover in 2013 which revealed that certain features of Wyndham’s urban landscape result in lower sub-surface temperatures than the remainder of the landscape. These features include light coloured roofs, water, natural systems and canopy vegetation. As such, minimizing the heat island effect is not limited to the planting of canopy trees, but is also achieved through building design and the use of water in our neighbourhoods.

Within the Wyndham context, it is becoming more and more evident that the provision of any canopy trees is limited to the public realm, specifically street tree planting and open spaces. As such, the inclusion of requirements to create tree-lined streets and increased tree canopy coverage is supported. Plan Melbourne should ensure that the proposed network of boulevards previously proposed in Plan Melbourne is extensive enough to enable a difference to be achieved in our suburbs.

Wyndham currently experiences difficulties in accommodating trees in road reserves, as competing interests of developers maximizing residential land and servicing authorities requiring space in the road reserve, trees are left little room. In existing areas, the redevelopment of properties with two or more dwellings is increasing the number of crossovers required, also limiting areas for street trees. It is a growing concern that we are planning out the provision of good canopy trees.

In addition, there is further emphasis required on the ability to provide for canopy tree coverage, and other green infrastructure within the private realm as opportunities are being lost. Within the development of Melbourne’s growth areas, average lot sizes have fallen from 660 m2 in 2004 to 526 m2 in 2012 and more recently to 417 m2 in 2015. The most popular selling lot in 2012 was 376 - 400 m2. Despite the decreasing lot sizes, the average size of a house has not decreased. (Source: Oliver Hume Research)

Due attention is required on how canopy trees might be better encouraged within the private realm of the front yard and back yard and in the public realm of the road network.
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?

Option 56A is supported, and it is worth noting that Wyndham has some of the highest use of solar panels in Victoria with approximately 40% of Wyndham homes already generating solar energy. This has been achieved under current planning policy and previous incentive programs, however, further uptake can be encouraged through appropriate sustainable design planning triggers or PSP requirements that would allow Council to have a discussion about opportunities for renewables and a built form that would result in lower emission outcomes. For example: Banyule, Moreland, Port Phillip, Stonnington, Whitehorse and Yarra City Councils have recently had Local environmentally sustainable design (ESD) Policies gazette.

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?

With Wyndham expected to almost double in size over the coming 20 years, it is extremely important for our new suburbs to be designed to limit greenhouse gas emissions and to be able to respond to changes in our climate. This will ensure that they represent sustainable housing options into the future.

Currently, there are high levels of car dependency in our outer suburbs due to the location of many key services such as employment, retail and health and education facilities and limited public transport options. Car dependency results in not only higher emissions per household but also increases the vulnerability of outer suburb residents to the rising cost of petrol.

Wyndham also strongly supports the development of a low carbon economy in the region (see: https://lowcarbonwest.wordpress.com/), ensuring businesses are prepared for carbon pricing and have lower emissions. In this regard new commercial and industrial developments could benefit from planning controls and support for access to local renewable energy and other measures such as district heating and cooling to utilize waste heat in complimentary businesses.

Plan Melbourne can provide an excellent opportunity to strengthen these considerations through, for example, Precinct Structure Plans in greenfield and urban growth areas. This would provide the necessary mechanisms to
drive meaningful outcomes that are currently left to inadequate existing market forces.

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?**

This submission agrees that an integrated approach to ESD is necessary. Further work may be required to investigate the costs and benefits of Environmental Sustainable Design to allow an informed take up of ESD options. Cost/benefit analysis should adopt a lifecycle approach that includes the ongoing cost of living within a development area. Currently cost/benefit is too often assessed against the upfront capital cost only with insufficient consideration of long term livability and costs of maintenance.

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

Wyndham understands that Climate Change poses serious risks to people, business, natural environments and council operations in our municipality. Council is taking action both to help stop further climate change (i.e. by reducing greenhouse gas emissions) and to prepare for climate change that does occur (termed ‘adaptation’).

Council’s efforts to reduce greenhouse emissions are listed in its Environment and Sustainability Strategy and regionally via the Western Alliance for Greenhouse action (WAGA).

Appended to this submission via the following link is Council’s submission to the Review of the Climate Change Act 2010 which addresses a number of the issues raised in the Plan Melbourne Discussion Paper: [http://www.delwp.vic.gov.au/__data/assets/pdf_file/0017/311318/Wyndham-City-Council.pdf](http://www.delwp.vic.gov.au/__data/assets/pdf_file/0017/311318/Wyndham-City-Council.pdf)
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?

The existing planning tools are sufficient. The Activity Centre Zone is considered to be most relevant and best suited to the Clusters.

The Werribee City Centre has an Activity Centre Zone which is adequate to support the combined Werribee City Centre/ Werribee NEIC.

The Werribee NEIC has a Precinct Structure Plan and UGZ Schedule which allows the tweaking of land use zones. A proposal currently before the State Government for the development of an international “University City” may well require a review and amendment to the current PSP and UGZ Schedule. There is an opportunity to tailor the land use zones of the Werribee NEIC as required through a Planning Scheme Amendment. Nonetheless, the NEICs should be identified in Plan Melbourne’s Metropolitan Melbourne Structure Plan Map (Map 8, p.27 ) and in planning schemes of the host municipalities.

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?

Allowing for well-designed multi-unit development in appropriate areas should be made as easy as possible.

Hence, a code assess approach to multi-unit dwelling developments is supported. However, responsible authorities need to see the detail of what is actually proposed in this regard.

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

Buffer Protection for Metropolitan Waste Resource Recovery Centres

The State Government needs to continue its support for the development of tools under Plan Melbourne Initiative 5.8.1 for the separation of waste management and resource recovery from urban encroachment. Wyndham’s vision for its Wests Road landfill site is for the site and surrounding precinct to become a resource recovery hub at a metropolitan scale. This will require specific and careful planning including the reservation of land for complimentary land uses, and ensuring sensitive land uses do not encroach into key buffers. This approach is supported by the existing State Waste and Resource Recovery Implementation Plan. Important to this initiative is the update of the Growth Corridor Plans to incorporate the land use zone recommendations from the 2010 Logical Inclusions Urban Growth Boundary Review. The update of the Growth Corridor Plans is long overdue.
Planning near secondary airports (Point Cook)

It is noted that Plan Melbourne Refresh is to consider the future role of Essendon, Moorabbin and Point Cook airports, including the provision of training airports in Melbourne’s green wedges. Clarification on the extent of this review is sought. What is currently lacking in state planning policy is guidelines to inform how noise attenuation should be addressed in the preparation of Precinct Structure Plans for new residential areas located in close proximity to airports. While air noise from airports can impact on properties well outside the 20ANEF noise contour, there is no mandatory requirement on how prospective land purchasers should be informed of potential aircraft noise and what measures should be undertaken to mitigate aircraft noise in the design of new housing. This is an issue that will impact on the preparation of the Aviators Field PSP area adjacent to the Point Cook airbase.
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?

Plan Melbourne should be an enduring strategy that is comprised of a spatial plan, infrastructure plan, investment plan and monitoring and evaluation plan, incorporating a ‘managing growth plan’ that sets out a strategy for delivering coordinated infrastructure across Melbourne including its growth areas and outer suburbs.

It is suggested that extending the planning horizon for Plan Melbourne beyond 2050, as previously recommended by the Audit Expert Group on Melbourne 2030 (refer Section 46 below), would increase the scope of the long term planning of infrastructure maintenance and renewal.

The suggestion that the “Rolling Implementation Plan” be a separate, but linked document is supported in order to distinguish between Plan Melbourne Refresh as a high order Framework Plan that guides the future development of the metropolis and the “Rolling Implementation Plan” as a renewable set of actions that may be used to inform the State budget.

It is also critical that any “Rolling Implementation Plan” remains consistent with Plan Melbourne to ensure that implementation does not undermine the strategic intent of Plan Melbourne as a strategy.

To ensure successful implementation, it is recommended the State Government as a whole, views Plan Melbourne as a “Policy Shaping” document rather than a “Policy Taking” document. Plan Melbourne should drive policy and regulation outcomes in other departments that support the strategic intent of Plan Melbourne, not the other way around. By way of explanation, current Water Policy and pricing is one example where it could be argued runs counter to Plan Melbourne’s aim of protecting and sustaining peri-urban agricultural areas.

It is further suggested that extending the planning horizon for Plan Melbourne beyond 2050, as previously recommended by the Audit Expert Group on Melbourne 2030, would increase the scope of the long-term planning of infrastructure maintenance and renewal.

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

Identifying the infrastructure required to support the Plan and a timeline/plan for its roll-out.

As recommended previously by the Victorian Auditor General, “the Department of Transport, Planning and Local Infrastructure, in conjunction with Public Transport Victoria, VicRoads, and the Growth Areas Authority develop and implement:

- A state-wide framework for prioritising the delivery of transport infrastructure that reconciles broader state-wide priorities against the needs of growth areas;
• An implementation and funding strategy incorporating alternative financing options and innovative solutions to systematically address the transport backlog and meet the future needs of growth areas; and

• An associated monitoring and evaluation framework to assess whether the progressive delivery of transport infrastructure and services in growth areas is being achieved as planned and has been effective.”

The role of Infrastructure Victoria and how it should engage with the MPA and Local Government to inform itself of infrastructure priorities (as described in Section 47 below) is a critical element to making the Implementation Plan effective.

Also, targeting achievable outcomes, learning from past experiences and being bold.

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

Geelong as a Sixth-Sub-region of Greater Melbourne

As suggested in section 4 above under the sub-heading Integrated Economic Triangle, the spatial dynamic of the Melbourne metropolis warrants consideration of the inclusion of Geelong as the sixth sub-region of Greater Melbourne, while still recognising its dual role as a regional city.

Interface with Regional Cities and metropolitan growth councils

Further, to ensure adequate integration of the metropolis and its hinterland, representation on the Board of the Metropolitan Planning Authority should include a representative of Regional Cities Victoria, and a representative of Metropolitan Interface Councils/metropolitan growth councils to improve its appreciation of local government issues and the metropolis’s interface with regional Victoria.

Role of the MPA for the sub-regional planning groups in delivering Plan Melbourne

The role envisaged for the MPA is the coordination of Government departments and agencies into whole of government action in support of Plan Melbourne. It should play a coordinating role in a similar way for the Sub-Regional Planning Groups.

The preparation and review of PSPs and Development Contribution Plans for new residential and industrial communities should primarily be the role of councils in their capacity as planning authority, responsible authority, collection agency and development agency. The MPA should only assume the role of planning authority or responsible authority when expressly requested by the council that such role should be assumed by the MPA based on the circumstances of the PSP area.

The relationship of the MPA with local government should be in accordance with the Partnership Agreement negotiated by the MAV on behalf of growth area councils.

Its role should also accord with the Planning Minister’s statement of expectations of the Authority.
Role of Infrastructure Victoria and how it should engage with local government to inform itself of infrastructure priorities?

The role envisaged for Infrastructure Victoria is to conduct business case and cost benefit analysis of infrastructure identified by Plan Melbourne and then produce a Plan Melbourne Infrastructure Implementation Plan that ideally has a standing budget allocation. Infrastructure Victoria should also assume the role previously undertaken by the MPA to develop the sub-regional infrastructure plans in tight collaboration with other State departments, authorities and local government.

Infrastructure Victoria should also be given the task of identifying how Melbourne is best able to leverage off existing infrastructure. In this regard, a specific task should be to investigate the cost benefit analysis of bringing forward the delivery of proposed railway stations on the Regional Rail Link and Metropolitan network.

How can the governance of the MPA sub-regional planning groups be improved to drive the delivery of Plan Melbourne and sub-regional planning?

Representation on the sub-regional boards should include members of Treasury and Infrastructure Victoria to ensure alignment with State financial planning processes and informed cost benefit analysis of identified projects.

Any proceeds from Government land sales in National Employment Innovation Clusters should be reinvested into the development of those clusters or directly related infrastructure.

How can the MPA sub-regional planning group process better link to and align state and local government budget processes?

GAIC funds should be spent in the growth areas or sub-region in which funds have been raised.

The assistance of Infrastructure Victoria should be provided in order to assess the cost benefit of nominated projects to ensure that such funds are used to the ultimate community benefit. As noted above, this should be in tight collaboration with other State departments, authorities and local government and inform the preparation of a Plan Melbourne Infrastructure Implementation Plan that ideally has a standing budget allocation.

Appendix 1 – Wyndham City Submission to Senate Committee Enquiry into Housing Affordability (via the following link: http://www.google.com.au/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=0ahUKEwi12NjM4r7JAhVjraYKHZoZATAQFggeMAA&url=http%3A%2F%2Fwww.aph.gov.au%2FDocumentStore.ashx%3Fid%3D1330ac92-4f73-4263-9d8d-828e4d10c455%26subId%3D299041&usg=AFQjCNPhkhAnLTVVQnl3Z0kXuC5hRQh8psQ&bvm=bv.108538919,d.dGY