

Introduction

Please find following key information about making a submission.

Who can make a submission?

Anyone is able to comment and make submissions on the Plan Melbourne refresh discussion paper.

How will submissions be used?

We want a Plan Melbourne to reflect the community's views, particularly in relation to housing affordability and diversity, energy efficiency and climate change. All submissions received will be reviewed and inform Plan Melbourne 2016.

Will submissions be publicly available?

Written submissions will be publicly available and will be able to be read by others, unless you have requested and been granted confidentiality status.

Why do I have to register to make a submission or comment online?

The information provided in the registration form will help us analyse the responses and help us know which issues are of concern to residents in which areas of Melbourne or to particular community groups.

Can I provide a submission in another format?

Given the high volume of submissions anticipated it is strongly preferred that the online form or the downloadable template be used. This will ensure the most effective evaluation of the issues raised in submissions.

How do I make a submission?

You will need to register to make a submission. Submissions and comments will close at 5.00pm AEDST Friday 18 December 2015. Once registered, there are two ways to make a submission:

- Complete the [online submission form](#)
- [Upload](#) your submission using this submission template. Note that the preferred format is MS Word,

As part of making a submission, you will need to agree to the privacy collection notice and statement of confidentiality. These are outlined in both the online submission and upload forms.

Do I have to respond to all of the questions in the submission form for my views to be heard?

Not at all. You are welcome to respond to as many, or as few, of the questions on the Plan Melbourne refresh discussion paper as you would like.

Can I comment on other areas not addressed in the Plan Melbourne refresh discussion Paper?

This refresh is not intended to comprehensively revise Plan Melbourne 2014. It builds on the extensive work and consultation underpinning Plan Melbourne 2014. Much of Plan Melbourne 2014 enjoys bi-partisan support and will not change.

The Plan Melbourne refresh discussion paper and consultation process is asking Melburnians to take another look at particular aspects of Plan Melbourne 2014 that need revision such as the key issues of housing supply, diversity and affordability, and climate change and will reflect the Government's transport network priorities.

Submission Template

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

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

A. Prioritize the Building of Resilience of Communities to Disasters.

In particular,

- reference to and consideration of the implications of the Hyogo Framework for Action 2005 -2015 and its successor, the Sendai Framework, to which Australia has commitments in particular:
 - Identifying, assessing and monitoring disaster risks within and adjoining the footprint of Plan Melbourne and Plan Melbourne Refresh
 - Reducing underlying risk factors
 - Adopting or modifying legislation, where necessary, to support disaster risk reduction, including regulations and mechanisms that encourage compliance and that promote incentives for undertaking risk reduction and mitigation activities
 - developing and implementing better land-use planning and development activities to reduce risk and vulnerabilities,
 - development and implementation of building codes that foster disaster – resistant structures
- The National Strategy for Disaster Resilience 2011, which identified that resilient communities would have in place –
 - Land use planning systems and building control arrangements that reduce, as far as is practicable, community exposure to unreasonable risks from known hazards, and suitable arrangements are implemented to protect life and property. Further to this,
 - Planning approaches that anticipate likely risk factors and the vulnerability of the population can reduce future possible impact of disasters. Responsible land use planning can prevent or reduce the likelihood of hazards impacting communities. Building standards can mitigate the likelihood of loss of life, as well as damage to and/or destruction of property and infrastructure.

B. Avoiding development in locations where there is an intersection between high hazard (e.g. for bushfire) and high environmental values, where the resolution of competing imperatives may be problematic and result in compromises that achieve neither hazard mitigation nor environmental protection adequately. This links very well to the strategic settlement planning principles included in the Regional Growth Plans.

- Direct development to locations of lower bushfire risk.
- Carefully consider development in locations where there is significant bushfire risk that cannot be avoided.
- Avoid development in locations of extreme bushfire risk.
- Avoid development in areas where planned bushfire protection measures may be incompatible with other environmental objectives

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

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

Please explain your response:

The sustainable development goals are largely consistent with the Planning and Environment Act and are certainly consistent with the Hyogo Framework.

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

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

Please explain your response:

This will give more certainty as to the areas to be developed over time and allows for better long term planning for delivery of services, including emergency services. CFA supports locking down the urban growth boundary and directing new development into strategic locations and the concept of encouraging infill development. This will add certainty to our Service Delivery Planning.

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?*

In addition, it should more clearly articulate the constraints that such designations require no response and/or imply

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?*

No response

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:

No response

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

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

Please explain your response:

These key concepts are essential components in focusing on creating strong resilient communities. Climate change in particular, should lead to an increased focus on bushfire, storm, flood and heat.

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

These are covered off in CFA's response to question 1.

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?*

No response

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:

No response

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?

No response

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 response

- 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?***

There needs to be, in addition to other relevant matters, consideration of and planning to account for hazards and hazard driven events that might interact with people, businesses and infrastructure to reduce, as far as is practicable, community exposure to unreasonable risks from known hazards, and to ensure suitable arrangements are implemented to protect life and property.

- 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?***

CFA's doesn't have a view about the types of agricultural land and activities that need to be protected. However, protecting agricultural land by locating new development in high bushfire risk environments such as forests would be contrary to the Hyogo Framework Principles and the State Planning Policy Framework (clause 13.05 Bushfire)

- 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?***

No

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

None

Chapter 4: A more connected Melbourne

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

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

Why?

This would limit the expansion of the development footprint and the consequent demand for new infrastructure and emergency service locations.

In addition,

It is interesting to note that the Government's comments (page 41) regarding the Port of Hastings and that they are not committing to it at this time. A second port (in our response area) would have service delivery implications that would need to be worked through.

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?

No response

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

None

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?

This would limit the expansion of the development footprint and the consequent demand for new infrastructure and emergency service locations at the outer edge.

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

No response

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?

Plan Melbourne 2014 talks about a 15 year land planning horizon in this context. It would be desirable to couple the sequencing and density with planning for new infrastructure / emergency services (eg: CFA) required to support this growth.

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

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

See comments above

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

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

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

Which option do you prefer? Choose one option:

Option 37A

Option 37B

Other

Why?

Provides for greater opportunity to understand local opportunities and constraints, informed by local inputs and knowledge to identify:

- the most appropriate housing types
- the required quantity of those types

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?

From a fire perspective, locations with high environmental values and high bushfire risk should be protected from inappropriate developments as it can be very difficult to reconcile the competing imperatives of life safety, property protection and environmental values and services

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

See previous comment

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?

No response

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?*

Identifying opportunities for linking safety strategies such as household sprinklers to support housing diversity that caters for 'aging in place' where older citizens, who might not have the ability to quickly respond to house fire events, choose to remain in their homes instead going into institutions while they are still independent.

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?

No response

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

Just a cautionary comment that safety of residents should not be compromised – the most vulnerable people with the lowest ability to prepare themselves and their properties for bushfires should not be forced into the highest risk areas (usually outer peri urban) by costs.

Chapter 6: A more resilient and environmentally sustainable Melbourne

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

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

They take account of the natural and climate change hazards. The proper application of those principles as set out in the discussion paper would support the previous comments and cautionary advice provide by CFA.

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

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

The flexibility and agility necessary to deal with climate change (irrespective of arguments about the cause of climatic variations or long term changes needs to be considered in the construction and scope of hazard management planning tools. It would be useful to include a range of Emergency Service Organisations in the land use planning process with a view to mitigating risk through design, rather than having to deal with it as an issue later.

33. The discussion paper includes options (options 48 and 49, page72) to update hazard mapping to promote resilience and avoid unacceptable risk, and update periodically the planning system and supporting legislative and policy frameworks to reflect best available climate change science and data. Do you have any comments on these options?

CFA advocates for the implementation of the updated BMO mapping which was based on science and developed collaboratively (DELWP, CFA, MAV) and has been signed off by the Bushfires Royal Commission Implementation Monitor, to ensure that the bushfire hazard is accurately identified across Victoria. There are currently areas that are not covered by the BMO that were affected by the 2009 bushfires (Murrindindi) and there are large areas of vegetation that meet the BMO mapping criteria as outlined in Advisory Note 46 that are not covered by the BMO. CFA supports the identification of climate change as one of the key issues to be included in this document and considerations arising from evolving climate change science and data as critical triggers and inputs in monitoring and reviewing legislative and policy frameworks.

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

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

- These criteria are well balanced and reflect a considered risk management approach that would provide an excellent overarching framework for integrated hazard management planning within the planning and building regulatory systems. These could be most easily incorporated within the State Planning Policy Framework. The inclusion of Bushfire Hazard Management Criteria in the planning system this will increase the focus on bushfire, by local government & the planning department when strategic planning decisions are made, thus avoiding replicating mistakes of the past that provided major legacy issues in managing bushfire risk.
- There should be explicit and considered connection between the planning and building regulatory systems and EMV's State Bushfire Plan for integrated risk management and whole of government approach.

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

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

Regardless of whether it is accepted that climate change is being driven by human activity and acknowledging that political ideology can influence that acceptance and/or what that means for society and governments, infrastructure resilience to climatic variations and/or change is critical to proper functioning of business, community amenity and safety. It is recommended, therefore, that a precautionary approach be adopted and at the very least, consideration of climatic impacts upon existing and proposed infrastructure be undertaken in a structured and systematic way.

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

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

As a principle, this is supported. However, it should not occur at the expense of safety or increased bushfire risk to residents.

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?*

Comments :

- Any strategies should ensure that the tree canopy does not inhibit the ability of emergency service vehicles from being able to respond to incidents to building structures. Additional tree canopy may also result in more maintenance by local councils, possible entanglement with overhead power lines and additional storm / wind damage for SES.
- increasing connectivity and continuity with forests or woodlands can provide substantial fingers of fuel and bushfire risk into residential developments than would otherwise be the case. this could have significant impacts on safety on peri urban areas.

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?

No response

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?

No response

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

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

Many of the difficulties, tensions and delays surrounding development proposals arise because hazard considerations are only brought to the fore late in the development process. An integrated approach could incorporate these considerations from the earliest stages of development proposals and avoid the difficulties for proponents and regulators that their late consideration leads to.

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

CFA advocates that in relation to bushfire , it supports MAC recommendation : *'ensure settlement planning in growth areas and peri-urban regions responds to natural hazards' including grassland.* Preventing house loss & reducing rebuilds will add to Melbourne's environmental sustainability

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?*

No response

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?*

If we choose to go the codified route, with increased deregulation, need to ensure that there is a robust auditing, monitor and review and enforcement regime to address identified non-compliance. This needs to be supplemented by suitable engagement communication and development of practitioners as well as ensuring that the public understand their rights and how to escalate issues to the appropriate monitor or regulator.

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

None

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?

Yes. This will provide clarity to stakeholders

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

Effective consultation that facilitates ownership and acceptance by those affected by it.

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

None