

18 December 2015

Plan Melbourne Refresh Taskforce

For submission on-line

Dear Sir or Madam

Moorabbin Airport – Submission to Plan Melbourne Refresh Discussion Paper

Tract represents Moorabbin Airport Corporation Limited (**MAC**). MAC is the Airport Lessee Company (from the Commonwealth) of Moorabbin Airport and operates the Airport as an important centre of flight training, general aviation, employment and economic activity within south-eastern metropolitan Melbourne.

We provide this letter, and the accompanying submission, in response to the Plan Melbourne Refresh Discussion Paper (October 2015).

1. Moorabbin Airport today

Moorabbin Airport is Australia's leading flight training airport; a critical Victorian transport gateway which meets the needs of civil aviation users; and a centre of investment, employment and economic activity within the City of Kingston, the Melbourne metropolitan area and the state of Victoria.

The Airport is located 21 kilometres south-east of Melbourne's CBD, and has a land area of 294 hectares. The Airport's aviation-related infrastructure includes:

- 5 runways (2 lit, with standby power), 2 helipads, and taxiways, amounting to 320,000m² of asphalt, plus 10 kilometres of sealed internal roads;
- an Air Traffic Control Tower operated by Airservices Australia;
- advanced weather reporting and communications infrastructure;
- comprehensive drains and storm water retention facilities; and
- security fencing and access gates between landside and airside areas.

This infrastructure is used to support the Airport's role as Australia's third-busiest airport by aircraft movement numbers – some 230,000 in 2014. Of these, some 175,000 flight movements are associated with flight training operations, with around 800 students from Australia and overseas trained at the Airport every year.

Consistent with the *Airports Act 1996* (Commonwealth) and with successive Master Plans approved for the Airport by the Commonwealth Government, a range of successful, high-quality non-aviation land uses, compatible with the Airport's ongoing aviation functions, have been established at the Airport. These include:

- DFO (formerly Direct Factory Outlets), a distinctive retail format drawing customers from a wide catchment area;
- Kingston Central Plaza, a centre providing for a range of day-to-day and specialist retail needs which is currently the subject of a proposed expansion;

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- Chifley Business Park, a campus-style business park operating in the north-eastern sector of the Airport since the early 2000s; and
- Costco, a wholesale, warehouse-type retail outlet which opened in November 2015 within the Airport's eastern boundary, and which is expected to attract customers from across large parts of Melbourne's southern and eastern suburbs.

2. Moorabbin Airport in the future

The Airport's Draft 2015 Master Plan is currently being considered by the Commonwealth Minister for Infrastructure and Regional Development. The Airport's Master Plan is the document which establishes planning and land use controls for the Airport. Once approved the 2015 Master Plan will set out a strategic and land use planning framework for the next 20 years of the Airport's development.

It is expected that over the 20-year planning period during which the Draft 2015 Master Plan will be implemented, Moorabbin Airport will:

- Secure and enhance its national and international prominence as a centre of flight training, with 1,600 to 2,000 flight training students by 2035.
- Build on this success to become a place of learning, training, education and research in a wide range of aviation-related activities.
- Fulfill its recognised role as a Transport Gateway and a place of State significance within Melbourne and Victoria.
- Play an increasingly important economic role within the City of Kingston and the Southern Subregion of metropolitan Melbourne, as the heart of a diverse, integrated economic and employment precinct, with direct employment at the Airport increasing to 8,500 by 2035 and indirect employment of more than 15,000.
- Accommodate large-scale, master planned development, including retail, industrial and office activities of a scale not readily accommodated elsewhere in the region, with total investment of \$570 million (in 2014 dollars) by 2035.

3. Moorabbin Airport under Plan Melbourne 2014

As mentioned above, Plan Melbourne 2014 recognises Moorabbin Airport as a Transport Gateway and a Place of State Significance within metropolitan Melbourne's Southern Subregion. It expressly recognises the general aviation, scenic and commercial operations of the Airport, and the importance of its aviation training function.

4. Submissions in relation to Plan Melbourne Refresh

Recognition of the Airport within Plan Melbourne 2014 is appropriate, but the Plan Melbourne Refresh process offers the opportunity to reinforce the important place of the Airport within the transport, employment and economic frameworks of metropolitan Melbourne and Victoria.

The following table summarises MAC's submissions, as set out in more detail in the submission template which follows.

Discussion Paper ref/issue	MAC submission
1 – Opportunities and	The opportunity should be taken to better recognise

Discussion Paper ref/issue	MAC submission
challenges	<p>strategic opportunities for growth and innovation which are presented by Moorabbin Airport as a Transport Gateway, a Place of State Significance and a centre of investment, economic activity and employment within the established south-eastern suburbs of</p> <p>Melbourne, and with strong links to Melbourne’s growth corridors and to regional Victoria.</p>
3 – Urban Growth Boundary	While there should be a permanent urban growth boundary (UGB), it should be modified so that Moorabbin Airport is within the UGB.
4 – Green Wedge and peri-urban areas	Plan Melbourne should better articulate the values of green wedge and peri-urban areas by more clearly distinguishing between those areas which are reserved for their landscape, conservation or agricultural values – the true “green wedge” – and those originally designated as being inappropriate for urban development for other reasons, for example because of the existence of mineral resources or constraints such as airport-related noise.
5 – Elements of concept map for Melbourne	Moorabbin Airport agrees that the proposed high-level 2050 concept map should include National Employment Clusters, Transport Gateways and the other elements described above. In addition, it should recognise the potential for Transport Gateways to build on links with nearby National Employment Clusters to realise the potential to provide city-shaping outcomes and to function as places of investment and employment.
6 – Polycentric city and 20-minute neighbourhoods	Plan Melbourne should recognise the ability of State-significant elements within the Metropolitan Melbourne Structure Plan – including Transport Gateways such as Moorabbin Airport – to contribute directly to the objectives for a polycentric city with 20-minute neighbourhoods.
9 – Delivering jobs and investment; roles of National Employment Clusters	Plan Melbourne 2016 should recognise the potential for centres of innovation and knowledge-based employment which are outside, but have strong connections with, designated National Employment Clusters to contribute to the objectives of delivering jobs and investment.
10 – Options for National Employment Clusters	Plan Melbourne 2016 should take the broader approach to planning for National Employment Clusters.

Discussion Paper ref/issue	MAC submission
13 – Criteria for Activity Centres	Plan Melbourne 2016 should define the activity centre hierarchy in a practical, realistic and flexible way which recognises that commercial and demographic forces over time will affect the role that each designated centre (and others which may not be designated) assumes within the hierarchy.
19 – Comments on Chapter 4 (A more connected Melbourne)	<p>The current role of Moorabbin Airport including its provision of flight training is appropriate, notwithstanding that it may on some interpretations be located in Melbourne’s green wedge.</p> <p>Plan Melbourne should include a greater emphasis on anticipating the ground transport requirements and impacts of Transport Gateways and other Places of State Significance, and taking a forward planning approach to ensuring that roads and public transport networks have sufficient capacity to accommodate these requirements and impacts.</p>

On behalf of MAC, we thank you for this opportunity to respond to the Plan Melbourne Refresh Discussion Paper.

MAC looks forward to ongoing engagement in relation to the future strategic direction of metropolitan Melbourne, and to the Airport’s role as a centre both of specialised and diverse activities within the wider metropolitan area being reinforced and clarified in Plan Melbourne 2016.



Associate Town Planner
Tract Consultants Pty Ltd

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?*

The opportunity should be taken to better recognise strategic opportunities for growth and innovation which are presented by Moorabbin Airport as a Transport Gateway, a Place of State Significance and a centre of investment, economic activity and employment within the established south-eastern suburbs of Melbourne, and with strong links to Melbourne’s growth corridors and to regional Victoria.

Plan Melbourne 2014 designates Moorabbin Airport as an existing Transport Gateway, one of only 2 (the other being the Port of Hastings) in the Southern Subregion of metropolitan Melbourne. This designation carries with it the recognition that the Airport is a place of State significance because of its potential to provide city-shaping outcomes and its function as a place of investment and employment. Plan Melbourne 2014 recognises the interest that all Victorians have in these places achieving their potential to contribute to productivity and economic growth. It notes that the State Government (through the Metropolitan Planning Authority) and local government will have direct involvement in the planning of these places.

Plan Melbourne 2014 sets the strategic direction for Transport Gateways including to secure adequate gateway capacity for passengers and freight into and out of Victoria, and protecting them from incompatible land uses while encouraging adjacent complementary uses and employment-generating activity.

However the “stand alone” designation of the Airport as a Transport Gateway does not capture the existing role of the Airport as a centre of diverse retail and commercial activity, which has evolved over the past 25 years. It does not reflect the strong links and integration between the Airport and its surrounding areas, including National Employment Clusters at Dandenong South and Monash, and areas of existing economic activity and employment to the north-west and south-east of the Airport. It does not establish a clear framework for further developing and strengthening those links.

Plan Melbourne 2014 refers to future job growth in the Southern Subregion of between 110,000 and 150,000 by 2031. As some traditional industry sectors (such as the automotive components industry) decline in their absolute and relative contribution to jobs and economic activity, it is important to take every available opportunity to build on the competitive strengths of other sectors and the potential linkages between them.

250 companies are already located on the Airport grounds employing around 3,300 workers. Beyond the Airport’s boundaries, but close to the Airport and connected to it by existing and likely future transport links, a range of businesses of all sizes contribute to the diversity and competitive strengths of the Airport and its surrounds as a business and employment hub.

Economic analysis prepared for the purpose of the Airport’s Draft 2015 Master Plan estimates that on-Airport jobs will increase from 3,300 in 2014 to 8,500 in 2035. These additional 5,200 jobs represent up to 3% of the total new jobs which are required in the Southern Subregion by 2031.

The regional employment importance of the area including and surrounding the Airport calls for an innovative, coherent and integrated strategic planning approach to maximise the benefits for

metropolitan Melbourne and for Victoria as a whole.

Moorabbin Airport has been in discussion with the City of Kingston and the Metropolitan Planning Authority in relation to the concept of a “Kingston Central and Braeside Economic Precinct” which will include the Airport and its successful retail and commercial areas; established industrial areas such as Redwood Gardens and areas around Woodlands Drive and Governor and Boundary Roads; and smaller industrial areas west and south of the Airport. It may potentially extend to existing industrial areas to the north-west of the Airport.

It is estimated that at least 19,700 jobs, up to 30% of employment within the City of Kingston, are within the boundaries of the Kingston Central and Braeside Economic Precinct. These direct jobs are in addition to flow-on employment created through the multiplier effect, a significant proportion of which can be expected to benefit residents of the City of Kingston and other areas close to the Airport.

The success of businesses within this Precinct will build on ease of access to the worker and customer base in extensive residential areas of south-eastern Melbourne, and its proximity and ease of connection to this wider area.

Plan Melbourne 2016 should expressly recognise the existing and likely future contribution of Moorabbin Airport to shaping metropolitan Melbourne – not only through its transport links to regional Victoria and beyond, but through its contributions to employment growth, economic activity, training and innovation and the provision of goods and services at local, regional and metropolitan levels. Further detail in relation to how this recognition can be made is provided in the response to items 5, 6, 9, 10 and 13 in this submission.

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:

No response on this element.

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:

While there should be a permanent urban growth boundary (UGB), it should be modified so that Moorabbin Airport is within the UGB.

When the UGB was established in 2002, areas beyond the boundary were not intended to be “all green”. Those areas were intended to accommodate not only agricultural activity and conservation, but important natural resources and “urban-related” uses, including airports.

As initially implemented, parts of the Airport to the east and west of the runways were included within the UGB. Kingston Planning Scheme Amendment C38, which took effect in November 2003, revised the UGB so that all of the Airport was excluded from the UGB. Before Amendment C38 took effect, it was submitted that the Airport should be within the UGB. The then-Department of Sustainability and Environment rejected that submission, noting that the Airport “should not be included in the UGB as the land is owned by the Commonwealth Government and is not subject to strategic planning controls”.

While this is technically correct, the exclusion of the Airport from the UGB does not recognise the current and future role of Moorabbin Airport (as approved by the Commonwealth for the purposes of the *Airports Act 1996*) in the Airport’s Master Plans of 1994, 2004 and 2010. It causes confusion and concern to local residents as to the appropriate or authorised use of land at Moorabbin Airport and establishes a false expectation that areas not used for aviation facilities must remain as undeveloped open space. The Airport’s Master Plan is the document which determines how land is developed and used at the Airport.

If the present UGB is “locked in” it will inevitably be seen as securing the use of land outside the boundary for agricultural, biodiversity, recreation and other, purely “open space” or passive purposes. It is submitted that it was not and should not be the purpose of the UGB to proscribe or prevent land use which is well established and which has strategic support both from State and Commonwealth governments.

Together with a clearer recognition within Plan Melbourne 2016 of the role and potential of Moorabbin Airport and its contribution to State and metropolitan activities, the establishment of a permanent UGB that includes the Airport within it will assist residents and other stakeholders to appreciate that the Airport is a centre of activity which is an integral part of metropolitan Melbourne, albeit one where some activities (such as aviation) mean that special land use planning consideration must be given to impacts which may be experienced off-Airport.

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?

Plan Melbourne should better articulate the values of green wedge and peri-urban areas by more clearly distinguishing between those areas which are reserved for their landscape, conservation or agricultural values – the true “green wedge” – and those originally designated as being inappropriate for urban development for other reasons, for example because of the existence of mineral resources or constraints such as airport-related noise.

Over time, the role of green wedge areas has changed. In the 1971 Metropolitan Plan, for example, land in the vicinity of the Airport was identified as being constrained for the purpose of urban development by high noise levels associated with the Airport. Much of the same land was also identified as being constrained by the existence of proven stone resources (coarse concrete sands) and as having “adverse” terrain.

In 2003, the Minister’s second-reading speech when introducing the *Planning and Environment (Metropolitan Green Wedge Protection) Bill* – to insert Part 3AA into the *Planning and Environment*

Act 1987, requiring Parliamentary scrutiny of any change to land use in green wedge zones – referred to green wedges as providing for “valuable agricultural activity; important natural resources which must be protected for future use; significant areas of native vegetation; protection for water catchments”.

Importantly, the speech also noted that green wedge areas were never intended to be “all green”, and that as well as conservation and low-impact farming use, they are also the appropriate location for urban-related uses which should not be located in a built-up area – including airports.

In Melbourne@5 Million (2008), green wedges are described as providing “important protection of areas of environmental sensitivity and strategic locations that require separation from residential areas and agricultural purposes”. It was also noted that Melbourne 2030 always contemplated the need for areas adjacent to growth areas to be considered for future urban use.

The opportunity should be taken in Plan Melbourne 2016 to clearly define, and articulate the value of, green wedge areas for environmental, agricultural and tourism purposes. It should also more clearly distinguish these “true” green wedge areas from other “peri-urban” areas (whether those areas are within or outside the UGB) which, because of specific recognised constraints may not necessarily be suitable for residential or other sensitive land uses, but are still well placed to contribute to metropolitan strategic objectives in relation to infrastructure, investment and employment and the provision of goods and services at local, regional and metropolitan levels.

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?**

Moorabbin Airport agrees that the proposed high-level 2050 concept map should include National Employment Clusters, Transport Gateways and the other elements described above. In addition, it should recognise the potential for Transport Gateways to build on links with nearby National Employment Clusters to realise the potential to provide city-shaping outcomes and to function as places of investment and employment.

Plan Melbourne 2014 outlines the strategic direction for National Employment Clusters as centres with a diversity of employment opportunities and knowledge jobs; the growth of business activity and jobs of national significance; and the ability of businesses to leverage off their export and innovation potential to grow jobs in other industry sectors.

Moorabbin Airport has strong links, through its relative proximity, through existing and proposed transport corridors, and through economic, employment and complementary activities, with the National Employment Clusters at Monash and Dandenong South. One important example is the existing and potential future linkages between flight training and other technical and specialist education that occurs at the Airport, and the Monash cluster of education, research and commercialisation. Flight training and related activity at Monash is of national and international significance, is a significant contributor of export income and has the potential for significant innovation and cross-industry benefits.

While these complementary functions and linkages may be difficult to present in a concept map or plan, it is submitted that explanatory text should be included which recognises the potential for linkages between National Employment Clusters and other State-significant elements (including Transport Gateways) to take advantage of clusters of innovation, training, specialist employment and investment.

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:

Plan Melbourne should recognise the ability of State-significant elements within the Metropolitan Melbourne Structure Plan – including Transport Gateways such as Moorabbin Airport – to contribute directly to the objectives for a polycentric city with 20-minute neighbourhoods.

Plan Melbourne 2014 sets a strategic direction in relation to Activity Centres (which are Local-Significant Elements of the metropolitan Structure Plan) that they should enable 20-minute neighbourhoods by providing access to a wide range of goods and services. These centres will provide employment and vibrant local economies, with some serving larger subregional catchments. Through the removal of retail floorspace and office caps, Activity Centres may grow unrestricted.

A more localised contribution to the 20-minute neighbourhoods objective is described for Neighbourhood Centres, by providing neighbourhood access to local goods, services and employment opportunities.

The opportunity should be taken in Plan Melbourne to recognise the existing contribution of Moorabbin Airport (and other State-significant sites) to the 20-minute neighbourhood objectives, and their potential to build further on these roles. For example, it is estimated that 60% of on-Airport workers are located within a 20-minute drive of their employment.

The Airport has in recent years emerged as a significant centre for the provision of retail goods and services at a local level (for example through Kingston Central Plaza) and at a wider sub-regional level (DFO). Chifley Business Park at the Airport is an office and warehouse precinct of regional significance in south-eastern metropolitan Melbourne. Costco, which opened at the Airport in November 2015, is also of regional significance, with a catchment extending across a large part of Melbourne’s southern and eastern suburbs.

It follows that even where the “20-minute neighbourhood” is defined as “the ability to meet your everyday (non-work) needs locally, primarily within a 20-minute walk”, Moorabbin Airport and other State-significant elements have the ability to fulfil these objectives for significant parts of metropolitan Melbourne.

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:

No response on this element.

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

No further comments about chapter 2.

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?

Plan Melbourne 2016 should recognise the potential for centres of innovation and knowledge-based employment which are outside, but have strong connections with, designated National Employment Clusters to contribute to the objectives of delivering jobs and investment.

Moorabbin Airport is Australia's leading flight training airport, with 16 flight training organisations and 800 students trained every year by 670 people employed in the aviation industry. In addition, 400 flight training instructors are based at the Airport. 30% of flight training students are from countries other than Australia, including China, India, Singapore, Indonesia, Sri Lanka, Malaysia, Papua New Guinea and New Zealand.

25% of students training at the Airport are currently undertaking university studies at 2 Victorian universities that are well represented at the Airport. With skills and training an increased focus of all levels of government, the Airport is working with flight training businesses to continue to work with tertiary institutions offering, or considering aviation-related courses.

In addition to this flight training role, training for aircraft maintenance and related areas has the potential to be expanded at the Airport.

Moorabbin Airport is committed to building on these existing and potential strengths to forge links with tertiary education institutions and fully realise its potential as an aviation training centre of excellence. Recognition within Plan Melbourne 2016 that specialised innovation and knowledge-based employment may occur outside a designated National Employment Cluster, but still contribute to the development of innovation and knowledge-based employment across metropolitan Melbourne, will support and reinforce the development of these links.

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:

Plan Melbourne 2016 should take the broader approach to planning for National Employment Clusters.

For reasons outlined in response to Items 5 and 9, Plan Melbourne should look beyond the core institutions and businesses to recognise that there are strong existing and potential future linkages between the National Employment Clusters, and other State-significant elements including Transport Gateways.

By encouraging the further development of these linkages, Plan Melbourne can more effectively promote the development of National Employment Clusters as centres with a diversity of employment opportunities and knowledge jobs; with growing business activity and jobs of national significance; and with the ability for businesses to leverage off their export and innovation potential to grow jobs in other industry sectors.

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 on this element.

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 on this element.

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?

Plan Melbourne 2016 should define the activity centre hierarchy in a practical, realistic and flexible way which recognises that commercial and demographic forces over time will affect the role that each designated centre (and others which may not be designated) assumes within the hierarchy.

The Discussion Paper recognises that activity centres are “vibrant hubs where people shop, work, meet, relax and often live”. It is proposed to include the network of centres as an incorporated document in the Victoria Planning Provisions. While it is recognised that planning certainty is achieved by listing activity centres, there should also be recognition that on occasions commercial or demographic factors will dictate outcomes that may not be consistent with the established hierarchy.

Plan Melbourne 2014 identifies 3 criteria for identifying new activity centres:

- the centre should be well served by a range of transport options, including public transport;
- the centre should have capacity to establish a wider mix of uses and subsequently develop into an activity centre; and
- the centre should increase the density and diversity of housing in a walkable catchment, where appropriate.

The Advisory Committee report that preceded the Discussion Paper added to additional requirements:

- that the centre meets an identified market gap; and
- that the centre contributes to the delivery of a network of 20-minute neighbourhoods.

These additional requirements are supported.

Moorabbin Airport is a recognised Transport Gateway in Plan Melbourne 2014, and supports the continuation of this recognition in Plan Melbourne 2016. For reasons outlined in items 1, 5, 6 and 9 of this submission, however, Plan Melbourne 2016 should better facilitate and support the ability of Transport Gateways and, where appropriate, other State-significant elements, to advance many of the objectives associated with designated activity centres.

This view is reinforced by the fact that Moorabbin Airport achieves 4 of the 5 existing and proposed new criteria for identifying new activity centres, with the exception being that increased density and diversity of housing in the walkable catchment of the Airport is not appropriate given the Airport’s specialist aviation and flight training functions.

Moorabbin Airport does not support a revision to the strategic direction for Activity Centres which would remove reference to growth associated with the removal of floorspace caps for retail and office development.

- 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?***

No response on this element.

- 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 response on this element.

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

No further comments on Chapter 3.

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?

No response on this element.

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 on this element.

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

The current role of Moorabbin Airport including its provision of flight training is appropriate, notwithstanding that it may on some interpretations be located in Melbourne's green wedge.

Page 41 of the Discussion Paper includes the statement that "Further attention will be given to future demands for secondary airports and the role of Essendon, Moorabbin and Point Cook. The provision of training airports in Melbourne's green wedges also needs consideration".

This statement is difficult to respond to because it does not describe the nature of the further attention or consideration. Plan Melbourne 2014 recognises Moorabbin Airport as a Transport Gateway and Place of State Significance. It expressly recognises the Airport's general aviation, scenic and commercial operations of the Airport, and the importance of its aviation training function. This recognition is appropriate and should be carried through to Plan Melbourne 2016.

For reasons set out in response to item 4, above, it is only recently that there has been any policy which might suggest that green wedge areas should be preserved exclusively for environmental, tourism or agricultural purposes. The opportunity exists in Plan Melbourne 2016 to clearly distinguish "true" green wedge areas where it is appropriate to protect environmental, tourism or agricultural values, from other areas which are not the subject of contiguous development but are still important locations for important urban-related activities and infrastructure such as airports.

Clarification of this kind would greatly assist in minimising existing confusion and give a more accurate set of expectations to residents and other stakeholders as to how the Airport is likely to grow and develop in coming years.

Plan Melbourne should include a greater emphasis on anticipating the ground transport requirements and impacts of Transport Gateways and other Places of State Significance, and taking a forward planning approach to ensuring that roads and public transport networks have sufficient

capacity to accommodate these requirements and impacts.

Recent transport investigations undertaken for the Airport have found that the existing arterial road network serving the Airport and its vicinity has sufficient capacity for current and projected development. The network will be augmented by projects currently underway and proposed for the future which will assist in meeting the demand for passenger and goods access to and from the Airport.

However, Plan Melbourne 2016 should specifically provide for regular reviews of road network capacity and demand on a regional basis to ensure that the expansion of retail, commercial and other employment-generating activity, as well as residential development, does not run ahead of the ability of the road network to accommodate it. In the case of the Airport and the area surrounding it, developments such as the Hawthorn Football Club's Dingley base; proposed residential and commercial development at Thrift Park; and proposed residential subdivision of the Kingswood Golf Club all have potential to significantly increase demand on the road network. Increased levels of demand should be anticipated and addressed by network improvements in a timely fashion.

While public transport does not presently meet a large share of the transport needs of those who work at or visit the Airport, the Airport has expressed an ongoing interest in working with Public Transport Victoria and other authorities with the objective of increasing public transport services to and within the Airport, so that workers and other visitors to the Airport will in future have the choice of using this mode of transport.

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?

No response on this element.

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

No response on this element.

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?

No response on this element.

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?

No response on this element.

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?

No response on this element.

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?

No response on this element.

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?

No response on this element.

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 on this element.

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?*

No response on this element.

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 on this element.

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

No further comments about chapter 5.

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?

No response on this element.

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?

No response on this element.

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?

No response on this element.

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?

No response on this element.

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?

No response on this element.

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?

No response on this element.

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?

No response on this element.

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 on this element.

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 on this element.

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?

No response on this element.

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

No further comments about chapter 6.

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 on this element.

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?*

No response on this element.

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

No further comments about chapter 7.

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?

No response on this element.

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

No response on this element.

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

No further comments about chapter 8.