

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 coast is a major contributor to Melbourne's liveability today. It provides a special places to visit, work, holiday and live. Melbourne's two bays support its role as a freight hub and contribute to its economic prosperity. As the city grows the bays will come under increasing pressure. Protecting their environmental values is essential in planning for the city's growth.

The Central Coastal Board (CCB) recommends that 'blue edge' values be better articulated in Plan Melbourne Refresh, similar to what is required for green wedge and peri-urban areas.

The Board's response to the questions in this template indicate how we think Plan Melbourne Refresh could better recognise the coast as a priceless limited resource and how a long-term framework is required for its sustainable management particularly in the context of pressures for development and use and the impacts of climate change.

In Box 1 Key opportunities and challenges for Melbourne

- a) Growth and changing demographics – Melbourne's strong population growth is projected to continue and Plan Melbourne 2016 needs to direct the way the city grows to create places that capitalize on existing infrastructure and natural attractions to increase Melburnian's access to the opportunities the city offers.
- b) Climate change – To move Melbourne towards a low-carbon future we need to shift to low emission transport modes, green our city and implement other resource, urban and coastal management initiatives.

Reason for inclusion of additional words: a) The coast (blue edge) and green wedges are major contributors to Melbourne's liveability today and should be embraced (i.e. collectively by natural attractions) in the opportunities the city offers, b) climate change will have fundamental impacts on the coast – coastal management needs to be included in the statement on management initiatives needed.

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:

Excellent opportunity for Victoria to take a 'climate ready' leadership approach in urban planning.

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:

It is important to retain defined settlement boundaries and breaks of open space/coast between Melbourne and its many nearby towns otherwise the diversity of place and lifestyles is challenged by the imposition of suburbia. Pressure for development can threaten the very essence of what is important to many people.

4. The discussion paper includes the option (option 8, page 18) that Plan Melbourne 2016 should more clearly articulate the values of green wedge and peri-urban areas to be protected and safeguarded. *How can Plan Melbourne 2016 better articulate the values of green wedge and peri-urban areas?*

The values of green wedge, peri-urban and 'blue edge' (i.e. the bay) areas include:

- places to connect emotionally and enjoy the outdoors
- places to recreate and enjoy a 'healthy' lifestyle embraced by many
- opportunity to escape from pressures of city living
- opportunity for an alternative lifestyle and diversity of place
- natural areas for the protection of flora and fauna habitats.

The Central Coastal Board would like to ensure that 'blue-edge' values are considered in Plan Melbourne as well as those of peri-urban and green wedge areas.

The coast is one of Melbourne's most beautiful and diverse natural assets. Melburnian's have a strong connection with it. It is a special place to visit, work, holiday and live. It has major tourism attractions and commercial use. However, pressures on it are increasing and careful planning and management are needed to protect and safeguard the very essence of what is important to us all.

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?*

Port Phillip and Western Port bays – the bays are a priceless resource – people love to live near the coast, use its resources and recreate there.

6. The discussion paper includes the option (option 10, page 18) that the concept of Melbourne as a polycentric city (i.e. a city with many centres) with 20-minute neighbourhoods (i.e. the ability to meet your everyday (non-work) needs locally, primarily within a 20-minute walk) be better defined. *Do the definitions adequately clarify the concepts? Choose one option:*

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

Please explain your response:

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

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

Please explain your response:

The Central Coastal Board strongly supports the inclusion of climate change as a key concept and one that requires active response and an adaptation focus to maintain Melbourne's liveability (see comments on chapter 6).

Strong support for People, Place and Identity as a key concept:

- Direction 4.6 Create More Great Public Places Throughout Melbourne - to include blue-edge values (see Q4)
- Direction 4.7 Respect our Heritage as We Build for the Future – to include legislative obligations and commitments to the management of Aboriginal heritage and appropriate alignment with a revised Aboriginal Cultural Heritage Act.

NOTE: the review of the Aboriginal Cultural Heritage Act is omitted from the section on, Aligning with

other strategies and policy reviews (p11 of Discussion Paper).

We strongly support improved partnerships with local government as they are close to local communities and the people directly affected by risk. For example, in responding to climate change they can increase community understanding of the risks and engage with them in developing adaptation responses within a region.

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

Aligning Plan Melbourne 2016 and the implementation plan with current government strategies, priorities and policy reviews –p 11 of the Discussion Paper. Under Environment and Energy include:

- Review of the *Coastal Management Act 1995*
- Victorian Coastal Strategy 2014
- Central Regional Coastal Plan 2015-2020

It may be noted that a priority action in the Central Regional Coastal Plan is developing a Visitation Level of Service Framework to help plan for the sustainable use and development of tourism opportunities on the coast.

Chapter 3: Delivering jobs and investment Please go to Q31 for CCB comments

9. The discussion paper includes the option (option 20, page 30) to revise the Delivering Jobs and Investment chapter in Plan Melbourne 2014 to ensure the significance and roles of the National Employment Clusters as places of innovation and knowledge-based employment are clear. How can Plan Melbourne 2016 better articulate the significance and roles of the National Employment Clusters as places of innovation and knowledge-based employment?

10. The discussion paper includes two options (page 30) relating to National Employment Clusters, being:

Option 21A: Focus planning for National Employment Clusters on core institutions and businesses

Option 21B: Take a broader approach to planning for National Employment Clusters that looks beyond the core institutions and businesses

Which option do you prefer?

- Option 21A
 Option 21B

Please explain why you have chosen your preferred option:

11. The discussion paper includes the option (option 22, page 30) to broaden the East Werribee National Employment Cluster to call it the Werribee National Employment Cluster in order to encompass the full range of activities and employment activities that make up Werribee. This could include the Werribee Activity Centre and the Werribee Park Tourism Precinct. *Do you agree with broadening the East Werribee Cluster? Choose one option:*

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

12. The discussion paper includes the option (option 23, page 30) to broaden the Dandenong South National Employment Cluster to call it the Dandenong National Employment Cluster in order to encompass the full range of activities and employment activities that make up Dandenong. This could include the Dandenong Metropolitan Activity Centre and Chisholm Institute of TAFE. *Do you agree with broadening the Dandenong South National Employment Cluster? Choose one option:*

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

13. The discussion paper includes options (options 24 to 30, pages 33 and 34) that consider the designation of activity centres and criteria for new activity centres. *Do you have any comments on the designation of activity centres or the criteria for new activity centres as outlined in the discussion paper?*

14. The discussion paper includes the option (option 31, page 35) to evaluate the range of planning mechanisms available to protect strategic agricultural land. *What types of agricultural land and agricultural activities need to be protected and how could the planning system better protect them?*

15. The discussion paper includes the option (option 32, page 36) to implement the outcomes of the Extractive Industries Taskforce through the planning scheme, including Regional Growth Plans, to affirm that extractive industries resources are protected to provide an economic supply of materials for construction and road industries. *Do you have any comments in relation to extractive industries?*

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

Chapter 4: A more connected Melbourne

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

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

18. The discussion paper includes the option (option 35, page 43) to incorporate references to Active Transport Victoria (which aims to increase participation and safety among cyclists and pedestrians) in Plan Melbourne 2016. *How should walking and cycling networks influence and integrate with land use?*

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

Chapter 5: Housing

20. The discussion paper includes the option (option 36A, page 46) to establish a 70/30 target where established areas provide 70 per cent of Melbourne's new housing supply and greenfield growth areas provide 30 per cent. *Do you agree with establishing a 70/30 target for housing supply? Choose one option:*

- Strongly Disagree
- Disagree

- Agree
- Strongly Agree

Why?

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

22. The discussion paper includes the option (option 36B, page 46) to investigate a mechanism to manage the sequence and density of the remaining Precinct Structure Plans based on land supply needs. Do you agree with this idea? Choose one option:

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

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

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

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

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

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

Which option do you prefer? Choose one option:

- Option 37A
- Option 37B
- Other

Why?

25. The discussion paper includes the option (option 38, page 52) to introduce a policy statement in Plan Melbourne 2016 to support population and housing growth in defined locations and acknowledge that some areas within defined locations will require planning protection based on their valued character. *How could Plan Melbourne 2016 clarify those locations in which higher scales of change are supported?*

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

27. The discussion paper includes the option (option 40, page 56) to clarify the action to apply the Neighbourhood Residential Zone to at least 50 per cent of residential land by:

Option 40A: Deleting the action and replacing it with a direction that clarifies how the residential zones should be applied to respect valued character and deliver housing diversity.

Option 40B: Retain at least 50 per cent as a guide but expand the criteria to enable variations between municipalities.

Which option do you prefer? Choose one option:

- Option 40A
- Option 40B
- Other

Why?

28. The discussion paper includes the option (option 42, page 58) to include an action in Plan Melbourne 2016 to investigate how the building and planning system can facilitate housing that readily adapts to the changing needs of households over the life of a dwelling. *In what other ways can Plan Melbourne 2016 support greater housing diversity?*

29. A number of options are outlined in the discussion paper (page 58) to improve housing affordability, including:

Option 45A: Consider introducing planning tools that mandate or facilitate or provide incentives to increase social and affordable housing supply.

Option 45B: Evaluate the affordable housing initiative pilot for land sold by government to determine whether to extend this to other suitable land sold by government.

Option 45C: Identify planning scheme requirements that could be waived or reduced without compromising the amenity of social and affordable housing or neighbouring properties.

What other ideas do you have for how Plan Melbourne 2016 can improve housing affordability?

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

Chapter 6: A more resilient and environmentally sustainable Melbourne

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

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

They help outline the vision for Melbourne as a resilient city prepared for climate change.

Text for 4th principle would gain from mention of coasts i.e. enhancing natural values across neighbourhoods, waterways *and the bays*

e.g. Melbourne Water used the title *Better Bays and Waterways* to refer to the condition of our creeks, rivers, estuaries and marine waters.

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 Central Coastal Board strongly supports better alignment of the planning system to climate change challenges.

As a first step we strongly encourage use of a **Coastal** Hazard Overlay to communicate known and potential risk from outputs of hazard studies and detailed vulnerability assessments along the coast. It could cover all relevant climate change hazards (flooding and coastal recession) and remove the need for applying multiple overlays.

While the introduction of a hazard overlay is a good first step, we would like to see a more comprehensive approach for coasts based on the extensive work done by the Coastal Climate Change Advisory Committee in 2010. This work is still very relevant but more urgent. It would include:

- Updating the SPPF to refer to the VCS 2014 and the Central Regional Coastal Plan 2015-2020.
- Outlining the specific nature of the coastal climate change hazards that exist in an area in the MSS and include a strategic response in terms of priorities for development of adaptation plans. The concept of setbacks and buffers should be introduced as part of MSS policy and aligned with appropriate zones and overlays.
- Introducing a Coastal Hazard Overlay (see above)
- Using a new Coastal Zone to control use of development of both private and public land in vulnerable areas.
- Introducing a Coastal Transition Zone to enable planned relocation of areas judged to be unviable in the longer term.

Under current planning legislation, it would also be desirable to identify a referral agency for coastal erosion and ocean-based inundation.

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?

While we strongly agree with Options 48 and 49, we make the point that; for coasts these actions could be stated more simply as:

- Complete detailed vulnerability assessments along the coast.
- Update planning schemes to respond to best science and the most recent detailed mapping of hazard areas.

For Option 49, we do not believe that updating the legislative and policy framework is needed to

ensure the best climate science at regional and local scales is incorporated into the planning system.

The policy framework for coasts is updated every five years with the revision of the Victorian Coastal Strategy, similarly the Victorian Climate Change Adaptation Plan has a regular review period.

Legislation for coasts and climate change is currently being reviewed but this is not the necessary prerequisite for the changes that could and should be made to the planning system.

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?

Hazard management planning tools can play a critical role in HOW vulnerability and risk assessment is reflected in, or used in, the planning system. For example, a new 'Coastal Hazard Overlay' should be introduced to communicate known or potential risk of sea level rise and climate change and provide a trigger for consideration of vulnerability. This would include the risk of flooding and coastal recession and remove the need for applying multiple overlays.

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?

An infrastructure resilience test could potentially improve clarity of process and consistency in the assessment of infrastructure development and inclusion of climate change risks. Coastal areas particularly require structures to be designed and sited in ways that take into account local coastal processes and predicted impacts of climate change.

However, if such an approach is adopted one of the more critical elements is the design life attributed to each category of building. An observation is that residential use is often considered relatively short term i.e. 30 years. If this were applied to new development (as distinct from urban infill) it may mean that there is only a narrow buffer strip. The VCS policy direction of planning for possible sea level rise of not less than 0.8 m by 2100, and allowing for local coastal processes and conditions, requires a greater setback for the predicted impacts of climate change (unless a

timeframe of over +80 years is used).

An adaptation approach is required where there is a need to address the legacy of earlier landuse decisions. This situation comes back to a need for better information on coastal hazards at a more detailed local scale and the need to engage local communities in developing adaptation responses within the region.

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?

The importance and value of habitat corridors is well researched and they represent an important component of planning for a more resilient and environmentally sustainable Melbourne.

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?

Bring communities 'on-board' and provide information on these initiatives and why they are being undertaken.

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?

Yes, there is a need to actively manage emissions, particularly with Melbourne's population forecast and as part of a global responsibility to address climate change.

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?

See above

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?

This action will gain from government support to make it happen.

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

Chapter 7: New planning tools

42. The discussion paper includes options (options 58A and 58B, page 84) to evaluate whether new or existing planning tools (zones and overlays) could be applied to National Employment Clusters and urban renewal areas. *Do you have any comments on the planning tools (zones and overlays) needed for National Employment Clusters and urban renewal areas?*

43. The discussion paper includes options (options 59A and 59B, page 84) to evaluate the merits of code assessment for multi-unit development, taking into account the findings from the 'Better Apartments' process, to either replace ResCode with a codified process for multi-unit development or identify ResCode standards that can be codified. *Do you have any comments on the merits of code assessment for multi-unit development?*

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

Chapter 8: Implementation

45. The discussion paper includes the option (options 1 and 61, pages 14 and 90) of Plan Melbourne being an enduring strategy with a long-term focus supported by a 'rolling' implementation plan. Do you agree that separating the long-term strategy from a shorter-term supporting implementation plan is a good idea?

Yes, it is the best approach to achieve priority actions over a realistic timeframe keeping in mind a long-term vision/focus.

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

Ensuring:

- effective consultation in preparing the plan so that it has identified key issues and priorities for action
- lead and partner agencies have been identified for priority actions and the timeframe for actions are shown
- there is agreement between agencies to contribute to implementation of the plan
- appropriate funding is available
- regular reporting on progress and keeping stakeholders informed.

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

17 December 2015

Ref: CBCO 1147

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RE: Central Coastal Board Submission on Plan Melbourne Refresh

The Central Coastal Board (CCB) welcomes this opportunity to submit to *Plan Melbourne Refresh* and its focus for a more resilient and environmentally sustainable Melbourne. Please see our completed submission form attached.

The role of the CCB, under the *Coastal Management Act 1995* (the Act), is to provide government with advice about the central coast, from Breamlea to Inverloch, to work with the Victorian Coastal Council in implementing the Victorian Coastal Strategy 2014 in the region, and to facilitate and engage coastal managers and the public in ensuring a better future for the coast. Our submission emphasizes the importance of the coast for *Plan Melbourne*.

The CCB recommends that the values of 'blue edge' areas should be better articulated in Plan Melbourne Refresh.

The coast is a major contributor to Melbourne's liveability today. By responding to the submission template we have shown many places where reference to the bays (Port Phillip and Western Port) and natural attractions should be included. In question 4 we list the values of blue-edge, green-wedge and peri-urban areas as:

- places to connect emotionally and enjoy the outdoors
- places to recreate and enjoy a 'healthy' lifestyle embraced by many
- opportunity to escape from pressures of city living
- opportunity for an alternative lifestyle and diversity of place
- natural areas for the protection of flora and fauna habitats.

Melburnians have a strong connection with their coast as a special place to visit, work, holiday and live. A key point of the discussion paper is that the importance of people, place and identity should be better explained and given greater prominence. The coast should be an integral part of this.

In the introductory chapter of the Discussion Paper we draw attention to the fact that aligning with other strategies and policy reviews should include the Victorian Coastal Strategy 2014 and review of the *Coastal Management Act 1995* and review of the *Aboriginal Heritage Act 2006*.

In Q 8, we recommend reference to the Central Regional Coastal Plan 2015-2020. One of the priority actions in this plan is to develop a Visitation Level of Service Framework to help plan for sustainable use and the development of tourism opportunities on the coast.

The CCB recommends that better planning tools are developed to respond to climate change challenges, particularly with respect to coastal planning.

We would like to see a comprehensive approach in developing the planning tools to provide more direction and clarity on land use planning and development controls that can best support Government policy for managing coastal impacts of climate change.

The extensive work done by the Coastal Climate Change Advisory Committee in 2010 provides a good basis for this, namely:

- Outlining the specific nature of the coastal climate change hazards that exist in an area in the MSS and include a strategic response in terms of priorities for development of adaptation plans. The concept of setbacks and buffers should be introduced as part of MSS policy and aligned with appropriate zones and overlays.
- Introducing a Coastal Hazard Overlay to communicate known and potential risk from outputs of hazard studies and detailed vulnerability assessments along the coast. It could cover all relevant climate change hazards (flooding and coastal recession) and remove the need for applying multiple overlays.
- Using a new Coastal Zone to control use of development of both private and public land in vulnerable areas.
- Introducing a Coastal Transition Zone to enable planned relocation of areas judged to be unviable in the longer term.

This work is still very relevant, though perhaps more urgent. Under current legislation there is also a need to identify a referral agency for coastal erosion and ocean-based inundation.

The CCB recommends that the priority actions to plan for and manage coastal impacts of climate change are a) to complete detailed vulnerability assessments along the coast b) update coastal planning schemes to include best science and the most recent mapping of hazard areas and c) ensure the planning system has appropriate tools to address climate change risk and vulnerability (as outlined above).

While we support options 47 to 51 in Plan Melbourne Refresh Discussion Paper, we would like to make the following points:

- An adaptation approach is required where there is a need to address the legacy of earlier land use decisions. It requires detailed hazard mapping at a local scale and includes the need to engage local communities in developing adaptation responses within a region.
- For Option 49, we do not believe that the legislative and policy framework has held up the planning system responding to the best climate science. The policy framework for coasts is updated every five years with the revision of the Victorian Coastal Strategy, similarly the Victorian Climate Change Adaptation Plan has a regular review period. Legislation for coasts and climate change is currently being reviewed but this is not the necessary prerequisite for the changes that could be made to the planning system now.
- An infrastructure resilience test could potentially improve clarity of process and consistency in the assessment of infrastructure development and inclusion of climate change risks, particularly for coastal areas. If such an approach is adopted one of the more critical elements is the design life attributed to each category of building. An observation is that residential use is often considered relatively short term i.e. 30 years and this may equate to a lesser setback. The VCS policy direction of planning for possible sea level rise of not less than 0.8 m by 2100, and allowing for local coastal processes and conditions, should be a minimum requirement for new development.

The CCB strongly supports improved partnerships with local government in sub-regional planning and the implementation of Plan Melbourne 2016.

In responding to climate change, local government can increase community understanding of the risks and engage with them in developing adaptation responses within a region. Plan Melbourne 2016 implementation will also benefit from its approach of a long-term focus supported by a rolling implementation plan. It will require partner agencies being 'on-board', funding, regular progress reporting and keeping stakeholders informed. We look forward to being part of this process.

The CCB has worked with the Victorian Coastal Council in preparing this submission, and have provided one another with our submissions.

If you would like to discuss any aspect of this submission please do not hesitate to email myself, or the Board's Project Support,

Yours sincerely