

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?*

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:

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:

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?*

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?*

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:

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

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?**

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?

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?

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?

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?

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?

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?

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?

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?

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?

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?

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?

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

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

As the web site and registration process was 'down' we were not able to provide submissions as per the template. If we were provided with an extension, sufficient time, and advice on the formats we could 'silo' our comments into the above disconnected categories. As such we provide our general comments as below.

The Flemington Association is a residents group that has actively represented Flemington, including Newmarket and Travancore, for more than 40 years. Information regarding the Association can be found on our website.

The Association submits that "Flemington-Newmarket" should not be categorised as an Urban Renewal Precinct for the following reasons:

1. Flemington is the only precinct identified other than Footscray where an entire suburb is to be subjected to urban renewal. No justification has been given, nor is any readily identifiable, as to why Flemington has been singled out.
2. Flemington-Newmarket is the only precinct that follows a road corridor. This is contrary to the purported aim of Plan Melbourne to identify potential urban renewal precincts close to rail.
3. Unlike all other areas set aside for urban renewal, Flemington substantially comprises residential housing of established, consistent character. Most of this is covered by heritage overlay and has traditionally been protected from intensive and inappropriate development. There is no reason as to why this should now change.
4. The only exceptions to the established residential/heritage overlay areas are the Housing Estate and a small area along the northwest of Racecourse Road and Epsom Road. This comprises only a small percentage of the area designated for urban renewal. These areas are

contained and do not justify all of Flemington being prescribed for development. Importantly, any changes to the Flemington Housing Estate will be covered by a specific plan in consultation with the Department of Housing.

5. No reason has been identified for why only one side of Racecourse Road should be subject to "urban renewal" other than the arbitrary boundary of one side being Flemington. This is at odds with having consistent planning for similar, adjacent areas and again seems to have no justification.
6. The fact that the precinct includes Newmarket Train Station does not justify the whole of Flemington being targeted for development. Other established inner city areas adjacent to Flemington, such as Kensington, Ascot Vale and North Melbourne, have train stations but are not identified as urban renewal precincts. Newmarket Station does not, and apparently cannot, accommodate the peak hour regularity of train services that are provided at other nearby stations such as Moonee Ponds and Essendon.
7. Flemington is an established, residential area comprising primarily Victorian and Edwardian homes on comparatively small parcels of land. It already has intensive development on the Flemington Housing Estate, and the nearby Lombards buildings. There is approval for a 22-storey tower at 1 Ascot Vale Road. It is anticipated that there will be development by the VRC at Flemington Racecourse (outside the URP). None of this requires Flemington, which is otherwise an established residential area, to be zoned for urban renewal.
8. Other inner city precincts identified for urban renewal are capable of sustaining more intensive development, where there are less established homes and scope for utilising industrial and/or other vacant sites.
9. Moonee Valley City Council recently responded to overwhelming public concerns over a proposed Structure Plan for "Racecourse Road" (covering part of the area proposed to be designated for urban renewal). Many hundreds of residents objected to the categorisation of Flemington as a Major Activity Centre and fears of over-development of an established, local neighbourhood centre. This should not be reversed, particularly without any explanation.
10. Appropriate development is welcome, particularly on sites that can accommodate more intensive housing. But defining a whole suburb, particularly one of predominantly established, residential homes, as an Urban Renewal Precinct is likely to result in inappropriate development and potentially undermine the community, heritage and other positive attributes of Flemington. This surely cannot be an objective of "Plan Melbourne".

In support of our submission, we attach our submission to Moonee Valley City Council on the proposed Racecourse Road Structure Plan, which was later abandoned by Council. This sets out other cogent reasons as to why the area designated in "Plan Melbourne" is not appropriate to be designated an Urban Renewal

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