



050 HC 4/1/16

## Office of the Mayor Cr Neil Pilling

22 December 2015

Plan Melbourne  
Department of Environment, Land, Water & Planning  
GPO Box 2392  
MELBOURNE VIC 3001

Dear Sir / Madam

### PLAN MELBOURNE REFRESH DISCUSSION PAPER GLEN EIRA CITY COUNCIL SUBMISSION TO "PLAN MELBOURNE REFRESH"

Glen Eira understands that the Plan Melbourne Refresh is not intended to comprehensively revise Plan Melbourne 2014. Instead it seeks to update Plan Melbourne according to current transport and State Government commitments as well as strengthening a focus on housing affordability, climate change and energy efficiency.

Glen Eira supports the retention of the main priorities of Plan Melbourne 2014:

- *More jobs in the central city and designated locations across the suburbs*
- *An efficient transport system across the metropolitan region that links to regional cities*
- *A fixed urban boundary and compact urban form*
- *Housing growth and greater density in the right locations*
- *Protected natural and agricultural values on the city's fringe.*

The move to better define the opportunities and challenges for developing Melbourne is commended. Glen Eira also supports Government's attempt to better articulating competing objectives and how it intends to resolve the inherent tensions between these. For example, providing diverse and affordable housing for Melbourne's booming population, whilst maintaining Melbourne's liveability and character.

The following comments are provided in response to the key principles:

#### Housing

The focus on providing more social and affordable housing is supported; and the continued lead role that the Victorian Government plays. Plan Melbourne 2016 would benefit from clear definitions for social housing, affordable housing, and housing diversity.

Glen Eira City Council

80 MCGs of parklands  
enough footpaths to reach Sydney  
enough drains to reach Mildura  
enough roads to reach South Australia  
\$500m of town planning projects  
2,000 food safety inspections  
4,000 off-street car spaces  
23,000 tonnes of recycling  
32,000 tonnes of waste  
one million library loans  
care for 4,500 elderly  
services for 8,000 children  
9,000 immunisations  
67 school crossings  
46,000 street trees  
8,500 street lights  
45 sportsgrounds  
47 playgrounds  
and much more

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Bentleigh • Bentleigh East • Brighton East • Carnegie  
Caulfield • Elsternwick • Gardenvale • Glen Huntly  
McKinnon • Murrumbeena • Ormond • St Kilda East

It is proposed to accommodate the majority of new housing in Melbourne's established areas, rather than in the growth areas. Glen Eira adequately accommodates population growth through its longstanding housing policies and suite of residential zones. These serve to co-locate higher densities of housing with public transport. A balance has been achieved in maintaining low scale residential areas and channelling housing into locations that can best support change.

We have obtained government approval for maximum heights over all residentially zoned land where there were no limits before. Any move through Plan Melbourne 2016 to dilute the protection that Glen Eira has over its residentially zoned land will not be supported.

Plan Melbourne 2016 is progressing in conjunction with Government's review of residential zones. Glen Eira looks forward to a full consultation process, as foreshadowed by the Minister for Planning, including the opportunity for Council, community and all stakeholders to make Submissions on the application of the zones in their local contexts.

### *A More Resilient and Environmentally Sustainable Melbourne*

Glen Eira supports investigating how the planning system can help reduce greenhouse gas emissions and build Melbourne's resilience to climate change impacts.

The 'Better Apartments' review of multi-dwelling development requirements is a step in the right direction. The discussion paper contains environmentally sustainable design elements that are absent from the current ResCode, such as: landscaped roofs, optimising resource and energy use during construction and through the life of the building, and sustainable waste management within the building.

Glen Eira maintains that a Government led approach to climate change and environmentally sustainable design is preferable to individual policies produced by local government. Glen Eira has long advocated for a Statewide approach to ESD implementation, including changes to the Building Code of Australia (Victoria) which can then capture all new development and not just buildings that require planning permission.

### *New Planning Tools*

Introducing greater certainty in the planning process would benefit all participants; the community, applicants, and decision makers. Codifying minimum housing design standards, for example, is one way to achieve this. However, such an approach must not conflict with the range of outcomes envisaged with the various residential zones. Housing preferences in a Neighbourhood Residential Zone are very different to a Residential Growth Zone.

The 'Code Assess' framework provides the necessary certainty for an array of minor development applications. However, multi-dwelling development applications continue to pose potential impacts on neighbourhood character, and the amenity of neighbours. Any proposal to remove the community's input in the planning process is not supported.

Greater certainty in the planning process can also be achieved through legislative change compelling VCAT to apply Council policy for every decision, rather than just taking them into account. This will create more consistency and therefore, more certainty and transparency in the town planning decision making process. Without legislative change, VCAT will continue to make contradictory and inconsistent decisions on similar applications.

Investigation of new planning tools should also include an increase in town planning application fees.

Ratepayers are subsidising multi-unit property developers by a significant amount each year to administer planning applications which are not funded by planning application fees.

The fees are set by State government and have not been increased at all in the last six years under both Coalition and ALP governments.

Processing applications is costly and time consuming. It involves: seeking specialist advice, consulting with the community and considering objections; conducting public meetings; enforcing conditions of permits; and taking part in Victorian Civil and Administrative Tribunal appeals or mediations (for which Council receives no fee).

By contrast, VCAT is funded by State government. To offset government costs, appeal fees have been increased greatly over the same period. Developers are covering a high proportion of State costs but a low proportion of local costs.

For a multi-storey development with a cost of \$10m where Council makes a decision and it is appealed to VCAT, typical fees would be:

- Council \$4,939
- VCAT \$10,261 (State)
- Metropolitan Planning Levy \$13,000 (State).

Typically, Council does about 90% of the work and receives about 20% of total fees.

The fault does not lie with individual developers. They pay the fee which State governments have set.

Fees for projects up to \$500k could remain as they are. Fees for projects of \$500k or more should be set at full cost recovery.

In this Council significantly more than \$1m pa of rates goes to administering planning applications not funded by planning application fees.

The State Government controls both planning application fees and Council rates (rate capping). Therefore, the Government will need to consider whether to increase application fees or whether to increase rates.

### *A More Connected Melbourne*

Glen Eira supports the alignment of the “20-minute neighbourhood” concept to sustainable forms of transport such as walking and cycling. Various Council strategies contribute to this concept: Open Space, Walking, Cycling, and Sustainable Transport.

In order to achieve a genuine “20-minute neighbourhood”, co-operation from State public authorities is necessary to provide the necessary infrastructure that they are responsible for. For example, Vic Roads is responsible for pedestrian operated signals and traffic safety infrastructure on roads it manages. Often, the lack of these facilities create a safety gap or barrier for walking and cycling routes.

Improvements to the rail and road network are supported (level crossing removals), as are improvements to the cycling and walking networks, and the bus network. There is no mention of tram improvements and whether the existing tram initiatives listed in Plan Melbourne 2014 will remain.

The development of the smart bus network, especially to improve circumferential movement between modes of public transport is highly desirable. The implementation of Active Transport Victoria to improve cycling and pedestrian infrastructure is supported.

I thank you for the opportunity to participate in the formulation of Plan Melbourne 2016.

Yours sincerely

A handwritten signature in black ink, reading "Neil R Pilling". The signature is written in a cursive, flowing style.

CR NEIL PILLING  
**MAYOR**