

17 December 2015

To whom it may concern,

RE: Plan Melbourne Refresh

I refer to the recent release of the Plan Melbourne Refresh Consultation Paper and the request for feedback.

Baw Baw Shire Council resolved at its 9 December 2015 Council meeting to make a submission to the consultation process based on the following key elements:

- i. the lost opportunity to acknowledge the importance of the Peri Urban Cities;
- ii. the failure of this key strategic planning and infrastructure document to link with the Regional Growth Plans; and
- iii. the need to heighten the importance of Peri Urban Cities in supporting population growth and the economic value they provide to the state.

The location of the Peri Urban Cities play a key role in supporting Metropolitan Melbourne. Its proximity and ease of access to the Metropolitan area has seen housing growth at rates greater than established Melbourne suburbs and in Baw Baw Shire's case growing faster and will be larger than the regional Gippsland City. Plan Melbourne has failed to provide context to the role of these important Peri Urban Cities which the Regional Growth Plan's also fail to appropriately recognise.

It is considered that there is an opportunity for the Plan Melbourne Refresh to provide the missing link between the State Governments Visioning Documents. This could include a statement in the Plan Melbourne document on the roles and importance of the Peri Urban Cities and additional details on each Peri Urban City (not dissimilar to the Employment and Emerging Employment Clusters).

In Addition to the above we have included a response in the form of the consultation template. It is considered that there is value in some of the points while a a number of propositions are considered to be problematic or floored.

Should you wish to discuss this matter further please feel free to contact me on .

Director Planning and Economic Development

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?*

Agreed. Though there is a need to consider these key challenges in context with the Regional Growth Plans and the role of Peri Urban Cities.

It is considered that many of the opportunities and challenges identified (Growth, Changing Economy, Moving People and Goods, Housing Affordability, Providing Infrastructure, Low suburban densities, and Climate Change) in Melbourne will either be relevant to the Peri Urban Cities or supported through the continued and rapid growth of these locations.

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?*

This idea is supported. However, it is considered that Plan Melbourne and the Refresh Discussion Paper only consider Peri Urban areas as the land located within the Metropolitan boundaries but outside the growth boundary.

It is considered that Plan Melbourne has missed the importance of the role Peri Urban Cities play in supporting the Metropolitan area through housing, employment, tourism, etc. The Plan Melbourne Refresh should look beyond the Interface Council's to also have regard to the importance of the Peri Urban Cities and the need for strong planning policy and infrastructure deliver.

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?*

Agree. However, it is considered that any map need to have regard to the Metropolitan areas and its relationship with the economic centers including the Peri Urban Cities.

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:

Whilst this is a strong aspiration and has identifiable benefits there are concerns how this will be implemented.

In order to retrofit a suburb and provide access to key infrastructure there will likely be significant costs escalation, particularly to Local Government in its provision of public open spaces, and rezoning land to enable new commercial centers. It is considered that while planning policy could encourage this aspiration the success will be driven by the private sector investment.

Furthermore, State Government will need to ensure those existing areas which are currently deprived of key infrastructure are not forgotten when implementation of this policy occurs.

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:

There is a need for planning policy to respond to the need for housing affordability. This needs to look beyond the supply of cheap metropolitan fringe housing or provision of apartments without the provision of car parking spaces.

Policy needs to be incorporated into the planning system to ensure that social or affordable housing is provided as part of housing developments (for example 10% or 20% of the dwellings provided as affordable or social housing) with the use of incentives like tax breaks or National Rental Affordability Scheme.

While people are important to the livability and make up of a place, it is considered that having this as a key concept will be difficult to achieve through what is essentially a land use and development policy document. It is considered that the concept of using a land use and development policy to set aspirations around people will be difficult to achieve.

Lastly, the recognition and reinforcement of the important partnership between Local Government in sub-regional planning is a critical requirement if Plan Melbourne is to be successful.

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

There is a need to ensure that the Plan Melbourne refresh has a clear alignment with other government strategies, policies and priorities. This will ensure it has a whole of government buy-in and support for the overall vision to be delivered.

Notwithstanding the above, it is critical that long term infrastructure projects that will be good for the State of Victoria are not lost with the change of government and their associated priorities. Plan Melbourne and policy documents before it have set out clear city shaping projects like East/West Link, Port of Hastings, and the completion of the originally Ring Road alignment which will be necessary to be delivered into the future to unlock the existing and long term challenges for Metropolitan Melbourne but will also create greater economic efficiencies for the entire state.

In addition to the above please note that Baw Baw Shire Council sees that the Plan Melbourne Refresh has:

- i. missed the opportunity to acknowledge the importance of the Peri Urban Cities;
- ii. failed to link of this key strategic planning and infrastructure document with the Regional Growth Plans; and
- iii. failed to acknowledge the importance of Peri Urban Cities in supporting population growth

and the economic value they provide to the state.

The location of the Peri Urban Cities play a key role in supporting Metropolitan Melbourne. Their proximity and ease of access to the Metropolitan area has seen housing growth at rates greater than established Melbourne suburbs and in Baw Baw Shire's case growing faster and will be larger than the regional Gippsland City. The importance of Plan Melbourne has failed to provide context to the role of these important Peri Urban Cities which the Regional Growth Plan's also fail to appropriately recognise.

It is considered that there is an opportunity for the Plan Melbourne Refresh to provide the missing link between the State Governments Visioning Documents. This could include a statement in the Plan Melbourne Document on the roles and importance of the Peri Urban Cities and additional details on each Peri Urban City (not dissimilar to the Employment and Emerging Employment Clusters).

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?*

It is considered this change will do little to change the existing Plan Melbourne policy.

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:

It is considered that option 21B will ensure a wider scope and opportunity for economic development to occur.

- 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?

It is considered this change will do little to change the existing Plan Melbourne policy.

- 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?

It is considered this change will do little to change the existing Plan Melbourne policy.

- 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?**

This is supported. However, it is considered that this also provides an opportunity to make reference to the Peri Urban Cities and their importance as residential and economic hubs.

It is considered that the removal of caps on floor space is necessary to enable those areas designated as Activity Centres to continue to expand and provide greater diversity of services.

- 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?**

It is considered that the Plan Melbourne Refresh needs to have regard to this matter in terms of not

only land in the green wedges but also in the Peri Urban Cities. This is a critical piece of work that must acknowledge how the management of agricultural land will be protected to ensure that the state has a strong and viable agricultural based economy.

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?

Agree

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

The Plan Melbourne Refresh is suggesting that in Urban Renewal Areas there is a need for key transport infrastructure to be delivered early to support the development of these new areas. While this is important it should not be at the expense to long and overdue transport infrastructure that will assist in decreasing congestion in the metropolitan area and improving productivity in established areas and regional areas.

It is considered that there is an opportunity for the Plan Melbourne Refresh to provide the missing link between the State Governments Visioning Documents. This could include a statement in the Plan Melbourne Document on the roles and importance of the Peri Urban Cities and additional details on each Peri Urban City (not dissimilar to the Employment and Emerging Employment Clusters).

The Peri Urban Cities play an important role in the economy which the Plan Melbourne Refresh has failed to acknowledge. Metropolitan Melbourne's benefit from the knowledge and skill base of Peri Urban Cities population commuting daily to support the employment and workforce need. Additionally, the existing Peri Urban Cities employment and economic contribution supports Metropolitan Melbourne both directly and indirectly. These Cities employ significant numbers from the Metropolitan Areas and produce products that support the the population (goods and services).

Infrastructure delivery as part of the Plan Melbourne needs to look beyond the Metropolitan boundaries. Infrastructure provided in the Metropolitan links the whole state and can have a significant impact on the State's ability to effectively get product to market and compete efficiently in a global economy.

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?

There is concern with the proposal to have housing density or population target through the use of the planning system. This is controversial proposal which is a significant departure from the community's wishes. The introduction of the new Residential Zones has seen many areas in Metropolitan Melbourne implement the Neighbourhood Residential Zones, restricting opportunity for housing or population growth.

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

It is considered that the locking down of the Urban Growth Boundary and having a cap on housing and population in the Metropolitan area could enable the State of the Cities objective to be achieved, ensuring growth in the Peri Urban Cities, and providing housing choice close to the Metropolitan fringe.

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?

The introduction of the new Residential Zones has seen many areas in Metropolitan Melbourne implement the Neighbourhood Residential Zones, restricting opportunity for housing or population growth. The ability for this to be achieved would be difficult and in the face of the communities wishes.

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?

It is considered option B is most appropriate. However, as stated above there could be other options including locking down of the Urban Growth Boundary and having a cap on housing and population in the Metropolitan area so to enable the State of the Cities objective to be achieved, ensuring growth in the Peri Urban Cities, and providing housing choice close to the Metropolitan fringe.

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?

Key locations need to be defined by location to high levels of infrastructure (Physical, Social, and Economic).

There is a need to consider the role of Peri Urban Cities in this strategy to ensure there is a clear integration and acknowledgement of the role Peri Urban Cities play.

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?

There is a clear view of many within the community that increased density is not welcomed. There is obviously a need to look at how the application of the Neighbourhood Residential Zone is applied, but if there is a new position in the application of such a zone then there should also be a review of the areas where the zone has already been implemented to ensure that there is equity across the entire state.

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?

As discussed above it is considered that there are opportunities to provide incentives as suggested by option 45A & B.

However, the proposed option 45C is considered to be inappropriate and not supported. There have been many examples where the Department of Housing has sought to construct substandard

dwellings on the basis they were for social housing purposes. All persons must be housed in dwellings that meet the same standards regardless if it is private or social housing.

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

Plan Melbourne Refresh make suggestions about Greyfield Housing. It is noted that the concept appears to have some value, however, this may also have significant social impacts on the community who live in these areas which could be defined as greyfields. Pushing communities out to enable redevelopment with better quality housing could result in displaced communities. The implementation of this concept is one that would need careful consideration and execution.

The discussion paper also makes reference to the Minister for Planning's role as the Responsible Authority for Social Housing. If this is supported it would be recommended that the relevant Local Government Authority should be a determining Authority with specific regard to neighbourhood character, the built form and compliance with ResCode. There have been many examples where the Department of Housing has sought to construct substandard dwellings on the basis they were for social housing purposes. All houses should seek to meet the same standards.

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?

There is a need for consistency across all of Victoria to ensure there is a clear policy position and expectation that land use and development outcomes will respond to this critical issue which affects all people globally.

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?

There is a need for policy and planning controls to assist in land management having regard to extreme weather events. Controls need to be simplified and clear to remove burden on the planning system. However, additional planning controls and obligations should not be imposed without further support and resourcing to assist Local Government implement.

Any introduction of new planning controls or requirements need to have complete regard to the Planning Fee Structure and the Rate Capped environment.

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?

There is a need for policy and planning controls to assist in land management having regard to extreme weather events. However, additional planning controls and obligations should not be imposed without further support and resourcing to assist Local Government implement.

Any introduction of new planning controls or requirements need to have complete regard to the Planning Fee Structure and the Rate Capped environment.

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?

There is a need to be balanced in how extra planning controls will be implemented through the relevant Planning Schemes. There is also a question as to whether the Planning Scheme is the appropriate tool to implement these controls.

There is an increasing trend that appears to place all manner of land use and development matters into the Local Planning Schemes.

This is having a significant impact on the planning systems ability to process applications in an efficient manner. This also places increasing burden on Local Government to have resources to manage the increasing number of applications or technical assessment required.

Any introduction of new planning controls or requirements need to have complete regard to the Planning Fee Structure and the Rate Capped environment.

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?

There is a need to be balanced in how extra planning controls will be implemented through the relevant Planning Schemes. There is also a question as to whether the Planning Scheme is the appropriate tool to implement these controls.

There is an increasing trend that appears to place all manner of land use and development matters into the Local Planning Schemes.

This is having a significant impact on the planning systems ability to process applications in an efficient manner. This also places increasing burden on Local Government to have resources to manage the increasing number of applications or technical assessment required.

There is considerable concerns regarding the impact this action will have on local government resourcing and capital works expenditure given the current financial restriction imposed by the freeze on Planning Fees and the Rate Capping to be introduced in 2016.

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?

However, Peri Urban Cities need to be also considered as part of this proposal.

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?

It is considered that many Local Government organisations are already implementing this idea. The introduction of State Policy will ensure there is a consistent approach across the state.

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?

The introduction of policy focusing on the reduction of our carbon footprint and the use of renewable energy is a positive direction. However, any policy needs to extend beyond the Metropolitan boundary and consider all of Victoria.

Furthermore, it is considered that the implementation of this directive may sit more appropriately within the Building Regulations which could provide a mandate on all development, not just those that trigger a planning permit.

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?

It is considered that the structure planning process is the inappropriate location for the implementation of renewable and low emission energy generation infrastructure. This should sit within the Building Permit process.

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?

Again it is reiterated that while there is a need for this to be delivered and supported, the increasing reliance on the Planning System to deliver these outcomes is likely to have a significant impact on the planning systems ability to process applications in an efficient manner, place increasing burden on Local Government to have resources to manage the increasing number of applications and/or technical assessment required to assess these matters.

Any introduction of new planning controls or requirements need to have complete regard to the Planning Fee Structure and the Rate Capped environment.

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?***

It is considered that the existing array of planning zones will be able to enable the desired outcome. There is no need for additional planning zones or overlays to be implemented.

- 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?***

It is considered that this would be an inappropriate step, resulting in poorer planning outcomes compared to those the current ResCode controls allow.

It is recommended that ResCode needs to be strengthened to ensure that under Planning Law the Objectives are given ultimate weight and standing instead of being considered subservient to the current Standards.

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

Any introduction of new planning controls or requirements need to have complete regard to the resourcing impacts on local government. There is a need to have full regard to the Planning Fee Freeze (of nine years) and the Rate Capped environment and Local Governments ability to fund or provide services in a financially constrained environment.

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?

It is strongly agreed that the State requires a long term planning and infrastructure policy document to assist in providing clarity in the ways growth will be managed into the future. There is a clear need to ensure all key projects (like East-West Link, The Ring Road as originally proposed, Port of Hastings, New and Upgraded Rail (Train and Tram), etc) are outlined in the document and committed to. All of these projects (regardless of Political Priorities) are important to unlocking Melbourne and Victoria and supporting the economy.

There is a need for the long term direction to be outlined with a short term delivery plan being developed to clearly articulate the delivery of project and the associated funding. Local Government has for a long time been delivering 10 year capital plans to ensure the appropriate funding is allocated annually, it is only appropriate that the State Government is as transparent and accountable.

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

Plan Melbourne Refresh has two key elements:

1. Planning and Policy to facilitate the Growth; and
2. Infrastructure Delivery

It is considered that the Planning and Policy is able to be facilitated through the State Planning Policy Framework and through zoning and overlay controls.

The delivery requires a whole of Government implementation Plan which will ensure that Water Management, Road and Rail infrastructure, Community and Education Facilities, etc are managed in a coordinated manner. The State Government needs a program (similar to Council's 10 year capital plans) which it can hold the State Government Departments accountable to deliver.

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