



18 December 2015

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

**PLAN MELBOURNE REFRESH – removed**

**MOUNT COTTRELL**

We welcome the opportunity to contribute to the Refresh of Plan Melbourne outlined in the Discussion Paper released by the Minister for Planning in October 2015.

Wolfdene is one of Melbourne's leading Greenfield property developers. Our niche is our ability to deliver both integrated housing and land within our neighbourhood scale projects.

This submission is lodged by Wolfdene on behalf of the removed who own rem hectares of contiguous land at , Mount Cottrell, and particularly focuses on **Chapter 2: Growth, challenges, fundamental principles and key concepts** and **Chapter 5: Housing** as set out in the standard submission form.

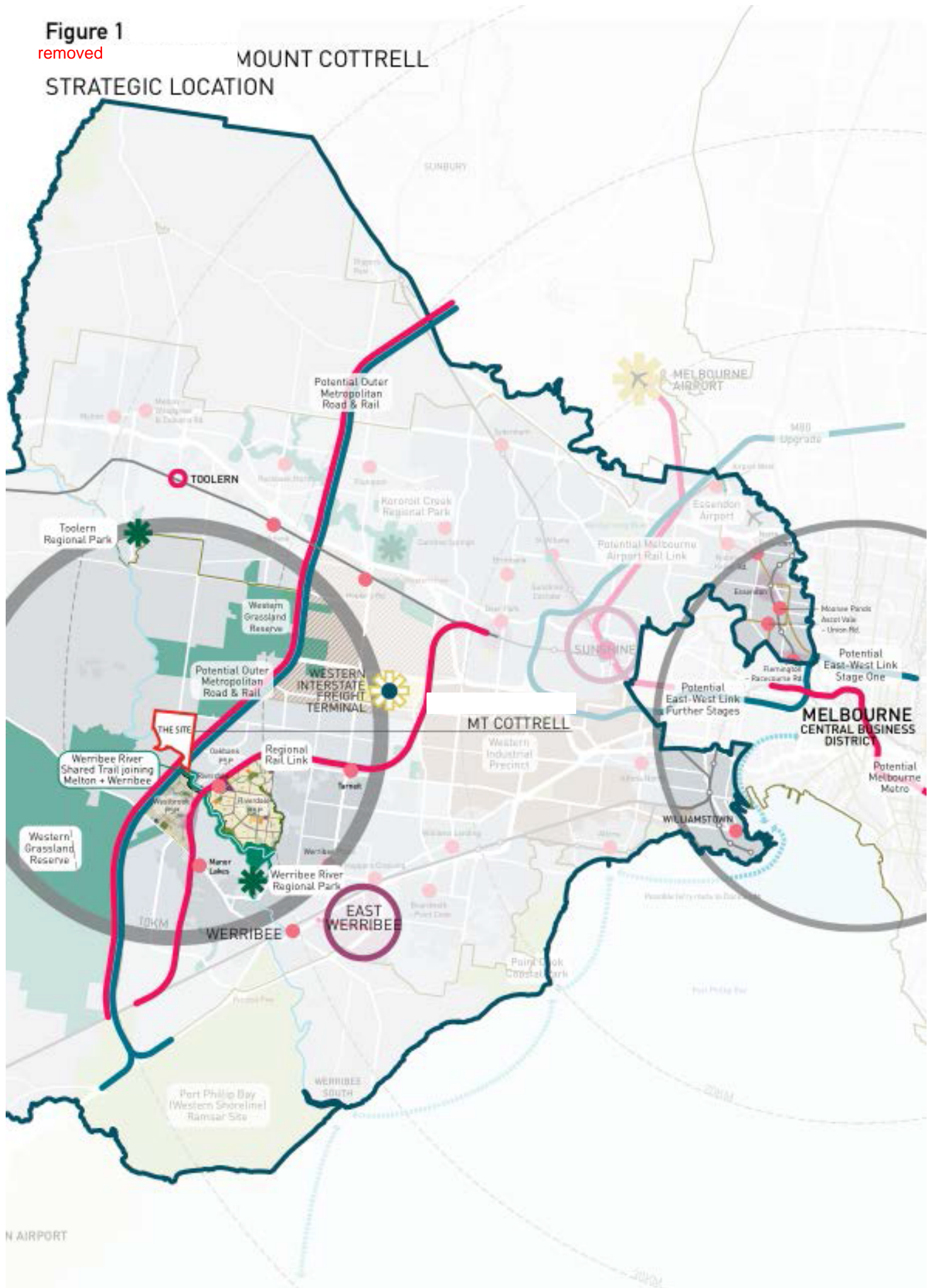
Wolfdene welcomes the opportunity to further engage and share its development experience with the Victorian State Government to ensure that Melbourne retains its' status as the world's most liveable city.

Yours faithfully,

Figure 1

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## MOUNT COTTRELL STRATEGIC LOCATION



## 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?*

Another opportunity that should be included in Box 1 is reference to the delivery of sufficient urban land to achieve infrastructure and funding efficiencies thereby securing the effective and viable delivery of key transport infrastructure.

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:*

As expressed

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:*

Sufficient land should be included in Melbourne's Urban Growth Boundary (UGB) to ensure that efficiencies are achieved in the funding and use of major transport infrastructure. The suggested mechanism set out in Initiative 6.1.1. of Plan Melbourne 2014 provides for this consideration to be taken into account by supporting a mechanism for locking down a permanent urban growth boundary that has regard to Melbourne's natural values and topographical features, and boundaries formed by major infrastructure.

To achieve efficiencies in delivery of major infrastructure, it is recommended that in locking down a permanent boundary, land should be included that enables development to occur along the alignment of both sides of key transport infrastructure such as the Outer Metropolitan Ring Road.

Rather than the OMR, the Werribee River is the appropriate boundary for the urban area.

As shown in Figure 1 attached to this submission, Mount Cottrell is an example of land that should logically be included in the Urban Growth Boundary for this reason. Further, there are no extraordinary planning constraints affecting development of the site. In fact, its characteristics make it appropriate for urban development subject to the usual approach to urban design and structure planning prescribed by the PSP Guidelines.

Whilst there are a number of overlays affecting the site, the site does not comprise part of the Western Grasslands, and its inclusion within Melbourne's Urban Growth Boundary would secure the delivery of a critical section of the proposed Werribee River shared trail extension that runs through private land. The Werribee River Shared Trail is strongly supported by Park Victoria and the Melton and Wyndham Councils to link key assets and provide a natural, cultural, recreation, and tourism focus for current and future residents of the rapidly expanding western growth corridor.

Further, the site's location within close proximity to the Riverdale Activity Centre and Rail station (4km) and the proposed expanded Western Industrial Precinct (5km) makes it particularly appropriate for inclusion within Melbourne's urban area. The site is close to high order employment, social and transport infrastructure and promotes the 20-minute city principles.

In addition, the Mount Cottrell land is affected by the Outer Metropolitan Ring Road and Rail alignments with Public Acquisition Overlay 5 directly affecting areas within three of five titles comprising the site. Further, the proposed extension of Leakes Road into Mount Cottrell Road as shown in the Growth Area Plans passes through the site. This road extension is planned to connect into a four-way diamond interchange with the OMR. The Leakes Road extension provides further logic to include the site within Melbourne's Urban Growth Boundary.

In terms of locking down a permanent UGB for Melbourne whereby only green wedge land lies outside of the UGB, the existing provisions of the *Planning and Environment Act 1987* already provide an appropriate balance between the uncertainty of the future and securing the city's boundary. Any change to the UGB requires positive ratification of both Houses of Parliament. This mechanism is sufficient to ensure that any changes are subject to the closest scrutiny by Government.

- 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?***

It is considered that the existing Green Wedge, Rural Conservation, and Special Use Zones are satisfactory planning tools to enable the values of green wedge and peri-urban areas to be clearly articulated and protected.

- 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?***

The concept of a Metropolitan Structure Plan is supported. It should show State Significant transport

infrastructure, activity centres, national employment clusters, and the current Urban Growth Boundary

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:

No comment

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

No comment

### 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?*

No comment

**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:***

[No comment](#)

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

☐ Strongly Disagree

☐ Disagree

☐ Agree

☐ Strongly Agree

***Why?***

[No comment](#)

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

☐ Strongly Disagree

☐ Disagree

☐ Agree

☐ Strongly Agree

***Why?***

[No comment](#)

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?*

No comment

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

No comment

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

No comment

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

No comment

## 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?*

It will assist in reducing dependence on the car as the primary mode of transport for Melburnians.

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

No comment

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

No comment

## 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?*

A 70/30 target is simplistic and could have the adverse effect of reducing affordability of housing in Melbourne. The target makes an assumption about the type of housing the community wants to live in. Instead of setting a target, the planning system should facilitate housing on land where on consideration of the planning merits, it is appropriate for housing to proceed.

Instead of focusing on a particular housing target, Government's planning focus should instead be on providing for the effective and efficient delivery of infrastructure within the existing urban area and the cost-effective delivery of new infrastructure to support growth areas. This focus will assist in providing for healthy market-led competition, and a diversity of housing choice whilst maintaining housing affordability.

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

No comment.

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

- ☐ Strongly Disagree  
☐ Disagree

- ☐ Agree  
☐ Strongly Agree

**Why?**

No comment

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

- ☐ Strongly Disagree  
☐ Disagree  
☐ Agree  
☐ Strongly Agree

**Why?**

No comment

**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?**

As set out above, instead of setting housing targets, the planning system should facilitate housing on land where on consideration of the planning merits, it is appropriate to do so.

Government's planning focus should be on providing for the effective delivery and use of infrastructure within the existing urban area, and facilitating the supply of land within Melbourne to provide for healthy market-led competition, and a diversity of housing choice. This approach will maintain housing affordability, and ensure the delivery of housing to meet market demand.

**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?**

Areas where higher scales of change are supported should be those areas that are not subject to cultural, heritage, or environmental constraints.

- 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?**

[See response to question 25.](#)

- 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?**

[This extent of regulation is unnecessary at a State level](#)

- 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?**

[Allowing sufficient flexibility in the planning system to support merits based assessment of proposed development](#)

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

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

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

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

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

[No comment](#)

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

No comment

## 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?**

It is critical to maintaining Melbourne's status as the world's most livable city that environmental principles are delivered by all development.

**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?**

A policy review would ensure that hazard management planning tools take into account the latest thinking in relation to climate change

**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?**

Same response to question 32 above.

**34. The discussion paper includes the option (option 50, page 73) to incorporate natural hazard management criteria into Victorian planning schemes to improve planning in areas exposed to climate change and environmental risks. Do you agree with this idea? Choose one option:**

- ☐ Strongly Disagree  
☐ Disagree

- ☐ Agree  
☐ Strongly Agree

**Why?**

No comment

**35. The discussion paper includes the option (option 51, page 75) to investigate consideration of climate change risks in infrastructure planning in the land use planning system, including consideration of an 'infrastructure resilience test'. Do you agree that a more structured approach to consideration of climate change risks in infrastructure planning has merit? Choose one option:**

- ☐ Strongly Disagree  
☐ Disagree  
☐ Agree  
☐ Strongly Agree

**Why?**

No comment

**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?**

Melbourne's Green Wedge (excluding land that does not qualify as such) and the establishment of large conservation areas under the Biodiversity Conservation Strategy is the preferred approach to promoting the long-term health of key flora and fauna habitat.

Where there are opportunities to formalize habitat corridors, however, these should be acted upon. The Werribee River Shared Trail provides an example of such an opportunity. As set out in the Werribee River Shared Trail Strategy (April 2013) removed

the Werribee River Shared Trail has the strong potential to provide a new publicly accessible open space along the Werribee River that will provide a natural, cultural, recreation and tourism focus for current and future residents of the rapidly expanding Western growth corridor. In order to formalize the corridor, it is logical for the Werribee River to form the outer edge of Melbourne's western urban growth boundary so that public access can be formalized through the precinct structure planning process.

37. The discussion paper includes options (options 53 and 54, pages 78 and 79) to introduce strategies to cool our city including: increasing tree canopy, vegetated ground cover and permeable surfaces; use of Water Sensitive Urban Design and irrigation; and encouraging the uptake of green roofs, facades and walls, as appropriate materials used for pavements and buildings with low heat-absorption properties. *What other strategies could be beneficial for cooling our built environment?*

No comment

38. The discussion paper includes the option (option 56A, page 80) to investigate opportunities in the land use planning system, such as strong supporting planning policy, to facilitate the increased uptake of renewable and low-emission energy in Melbourne and its peri-urban areas. *Do you agree that stronger land use planning policies are needed to facilitate the uptake of renewable and low-emission energy? Choose one option:*

- ☐ Strongly Disagree  
☐ Disagree  
☐ Agree  
☐ Strongly Agree

*Why?*

No comment

39. The discussion paper includes options (options 56B and 56C, page 80) to strengthen the structure planning process to facilitate future renewable and low-emission energy generation technologies in greenfield and urban renewal precincts and require consideration of the costs and benefits of renewable or low-emission energy options across a precinct. *Do you agree that the structure planning process should facilitate the uptake of renewable and low-emission technologies in greenfield and urban renewal precincts? Choose one option:*

- ☐ Strongly Disagree  
☐ Disagree  
☐ Agree  
☐ Strongly Agree

*Why?*

No comment

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?**

It would increase the cost of planning without the certainty that a development will be approved.

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

No comment

## Chapter 7: New planning tools

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

No comment

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

No comment

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

No comment

## 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

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

It should be flexible to adapt to changing circumstances over time.

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

No comment