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**ATTENTION: Plan Melbourne refresh taskforce**

At this time of year, and with 3 submissions all closing today, it has not been possible to submit these comments earlier. I trust you will still be able to include them with other Plan Melbourne refresh submissions.

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President,  
Save Our Suburbs

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## "Plan Melbourne Refresh"

**This is a comment by Save Our Suburbs Inc. on the underlying factors and drivers of land use planning in Melbourne, rather than an attempt to evaluate the myriad details within Plan Melbourne.**

Our basic premise is that Plan Melbourne and related legislation must adopt a new focus because more intensive land use development to cater for a doubling in population by 2050 is neither necessary nor desirable, for many reasons including:

First and foremost, and most serious, the Limits to Growth model revisited in 2009 in the US and by in 2014 has accurately predicted general global economic, environmental and population trends for decades now, including climate trends. Most significantly, it also shows that continuation of the "business-as-usual" scenario will lead to global economic, environmental and population collapse before 2050, with the beginning of the economic decline becoming evident in 2015. Dealing with this decline will necessitate a rapid transition away from our business-as-usual path towards a non-carbon, steady-state economy while we still have some flexibility to make choices:  
[http://espas.eu/orbis/sites/default/files/generated/document/en/MSSI-ResearchPaper-4\\_Turner\\_2014.pdf](http://espas.eu/orbis/sites/default/files/generated/document/en/MSSI-ResearchPaper-4_Turner_2014.pdf)

An increasing population growth rate makes it much more difficult to fund both the current backlog and the necessary increase in infrastructure and services, and to simultaneously reduce our carbon footprint to meet increasingly stringent climate change goals (see Dr Jane O'Sullivan: <http://www.onlineopinion.com.au/view.asp?article=10137>)

Fol request by Glen Eira planning activists revealed that the implementation of the new residential zones in Glen Eira (the blueprint for the rest of Melbourne) has the potential to provide for nearly 90 years' worth of extra housing (over 100yrs if the residential component of the new commercial zones is included) This is absolute overkill and is already starting to occur in areas of Carnegie and Bentleigh, as local Member ..... is well aware.

Dr Paul Mees' research shows that a greater number of more dispersed bus routes and light rail, all integrated to allow rapid commuting, is quite feasible even in an existing city as spread out as ours (Mees 2009: [http://atrf.info/papers/2009/2009\\_Mees.pdf](http://atrf.info/papers/2009/2009_Mees.pdf)) and cheaper to achieve than rebuilding large tracts of the middle and inner suburbs. Greatly increased densification along public transport routes and in activity centres is not necessary to meet likely housing demand and would destroy local heritage character.

There is a glut of unoccupied dwellings in Melbourne (up to 20% of city apartments). Government housing, tax and supply policies have allowed widespread residential and commercial vacancies in Melbourne. See recent Prosper Australia report by Catherine Cashmore: <http://catherinecashmore.com.au/wp/?p=706>

the economic and health benefits of retaining green open space and crown trees need to be formally recognised and provided for under planning policies and regulations – this is more critical now in a higher density city with global

warming: <http://treenetmedia.com/up/pdf/2009/2009%20urban%20trees%20worth%20more%20than%20they%20cost%20dr%20greg%20moore.pdf>

- There is a lack of real strategic thinking across transport and land use - see the following research papers:

Trams and Light Rail in Melbourne's Transport Future:

<http://www.railfutures.org.au/files/TramsLightRailMelbourne.pdf>

Future Proofing Melbourne: Integrating Metropolitan Land Use and Transport Planning:

<http://www.railfutures.org.au/files/150725PlanningPaperFinalDraft.pdf>

Melbourne at 8 Million: Matching Land Supply to Dwelling Demand:

<http://mams.rmit.edu.au/hy6qxqe0fuwiz.pdf>

These transport and land use papers alone suggest that the draft "Plan Melbourne Refresh" still fails to address many key sustainability & planning issues, including:

-->Failure to adequately integrate land use & transport

-->Inadequate statutory planning tools (such as mandatory planning requirements) including levies and taxes to capture value from land re-zoned for residential subdivision so as to provide services and infrastructure (the worst example being the lack of value capture for Fishermans Bend)

]-->Lack of rail routes to major destinations like Tullamarine airport, Chadstone & the Monash activity centre

-->Linking level crossing removal to urban renewal projects to not only resolve rail & road congestion but provide affordable housing and also meet much of the cost of the upgrade instead of selling the Port of Melbourne

-->Failure to facilitate residential growth in regional areas by any new means – rail services have been improved but need further upgrading

]-->The new residential zones were introduced before Plan Melbourne was developed – the wrong way round: zones should be designed to help achieve the goals of the city planning blueprint

Despite the reasons outlined above, the goal of 8 million people in Melbourne by 2050 could theoretically be met without further urban sprawl or damaging heritage and suburban amenity. As the RMIT paper demonstrates, this goal could be met via residential development within the General Residential Zone but allowing no medium density development (apartment blocks) on lots less than 1000m<sup>2</sup>. There are also massive brownfield sites around the CBD which could be developed according to the European model (only 5–6 storeys with pedestrian access and good public transport). Heritage protection (buildings prior to 1945) and amenity protection are the key issues.

But achieving this would require specific integrated policies and more regulation, not less – and this can only come from the government guided by the community, not from the market (which never acts primarily in the public interest).

So while the RMIT paper may be a debate catalyst, residents don't want this increased level of development - and it isn't even necessary. Current trends for the economy, climate change, infrastructure backlog, falling GDP per person, glut of empty investor apartments, lack of affordable housing and a current trend towards a decrease in population growth rate suggest that the Melbourne population projections of 8 million by 2050 are unlikely to eventuate.

Nor can the state keep the economy going on the back of an unstable construction boom that is already showing signs of shrinking.

All this highlights the urgent need for more mandatory regulations to guide optimal identified development, and for more interactive deliberative consultation with communities.

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*President SOS*  
*December 2015*

Footnote:

The highly restrictive format of the "Plan Melbourne Refresh" submission process, while streamlined for analysis by the bureaucracy, made it more difficult and time-consuming to make comments, let alone provide basic criticisms outside of the existing structure and assumptions of Plan Melbourne.