



Discussion Paper Submission

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?***

The Australian Institute of Landscape Architects (AILA) is the national advocacy body for landscape architects. AILA represents 2,500 active and engaged landscape architects, promoting their crucial role in shaping the world around us. Our membership covers a diverse range of professional services including strategic planning, urban design, building settings, public realm and open space design and natural resource management working across all levels of government and within the private sector.

AILA fundamentally believes that green (or living) infrastructure provides a key for Melbourne to enhance human health and liveability and to provide greater resilience across our built and natural systems. Green Infrastructure also has an important role to play in enhancing social sustainability by providing spaces and settings for human interaction.

Green infrastructure is defined as *'The network of natural and built landscape assets, including green spaces and water systems within and between settlements. Individual components of this environmental network, such as gardens, parks, recreation areas, highway verges and waterways, are sometimes referred to as 'green infrastructure assets' (Australian Standard 5334-2013 : Climate change adaptation for settlements and infrastructure - A risk based approach).* Green infrastructure has been shown to reduce air pollution, air-borne particulates and greenhouse gas emissions. It also can also protect against flooding, excessive heat (urban heat island impact) and other climatic variables, and can be effective in managing stormwater. Green infrastructure supports biodiversity and provides the critical connections within and between ecosystems. It also provides enhanced visual amenity which is important for the liveability, character and identity of Melbourne.

Melbourne's natural assets, its green wedges and open spaces are also key to tackling the major social issues such as an ageing population, climbing obesity and diabetes rates, reduced fitness particularly in young children, social exclusion and the increasing importance of positive mental health, major transportation challenges, and heat related death. The physical and mental health benefits of regular engagement with natural environments are well known. Creating a city that encourages people to be more active and connected with their community is a powerful preventative health measure and as a result can reduce escalating health care costs. Well-designed streets and open spaces reduce the barriers of people walking or riding, instead of using a car, by providing well connected path and cycle networks.

AILA advocates for the importance of green infrastructure to be elevated as a key opportunity in Plan Melbourne 2016, to enable the densification of the urban areas, while still maintaining the liveability of our city and supporting the health and well-being of our citizens. Investment in, and

management of, existing green infrastructure systems as well as strategically planning for new networks of public open space must be a deliberate part of delivering future Melbourne.

With the above in mind AILA makes the following comments regarding the key opportunities and challenges identified in Box 1 under each heading.

Growth and changing demographics

Directing Melbourne's growth in a way that capitalises on the city's existing infrastructure is logical and necessary. However when considering existing infrastructure it is important that Melbourne's green infrastructure, public spaces and streets are also considered, and that we not only 'capitalise on existing infrastructure' but also protect, enhance and invest in these important assets. In addition, existing infrastructure will need to be supplemented to respond to the needs of a growing population with diverse needs.

AILA advocates for the recognition of Melbourne's green infrastructure as a key contributor to the City's infrastructure assets. Existing green infrastructure assets need investment to improve their quality and ability to cope with intensive use, and more green spaces are required in strategic locations to support density increase.

AILA advocates for each municipality to work across boundaries to develop green space and urban forest strategies to future-proof their urban areas and the liveability of their communities.

Moving people and goods

A missing key opportunity is reference to building sustainable public transport infrastructure and supporting initiatives that reduce car dependency.

AILA advocates for the inclusion of a Melbourne wide sustainable transport strategy that consistently preferences public transport over private.

Housing affordability

A clear explanation of what housing affordability is, and how Plan Melbourne 2016 will address it, is required. While AILA supports the inclusion of a plan to achieve housing affordability, it is also recommended that Plan Melbourne 2016 address and acknowledge the issue of growing homelessness and increasing need for adequate social housing. Affordable and social housing should coincide with access to services and public transport to reduce vehicle dependency and social isolation. Clear articulation of state government policy in this area is absolutely necessary to achieve this outcome.

AILA advocates for inclusionary zoning for affordable housing on large well-located sites and in urban renewal areas. AILA encourages Government to adopt and adapt successful affordable housing strategies from London and Europe and to use all the levers at their disposal to ensure the city remains accessible to key workers and all socio-economic groups.

Providing services and infrastructure for communities

The plan for the city's ongoing development needs to incorporate measures that not only protect the capacity of the Melbourne's green infrastructure assets to continue to support urban life, but to ensure that the essential amenity and services provided by open spaces throughout the city is

retained. These community assets provide economic, social, cultural and environmental value.

AILA asserts that well-designed public realm is critical to a resilient and liveable city. AILA therefore recommends that ‘quality outdoor spaces’ is added as follows:

- **‘New communities take time to form and it is important for all Melburnians to access to health, education, public transport, quality open space, retail and community facilities and services.’**

Low suburban density

It is acknowledged that Melbourne’s urban footprint is one of the largest in the world, and limiting the city’s urban sprawl is vital to the future success and sustainability of the city. AILA agrees that the urban growth boundary should be fixed. AILA also suggests that the value and importance of the edge-of-city landscape, and the role it plays in supporting the urban conurbation, needs to be recognised and elevated in public consciousness.

Increased density in existing urban areas should also consider proximity to essential amenities such as quality open space to homes, as well as transport and jobs. Quality open spaces are critical to the city’s future liveability.

AILA supports the densification of the inner and middle ring, the ‘grey-fields’, but this transition must be enabled by sustained investment in high quality public realm and an increase of the landscape amenity of our suburbs. Suburban transformation has to be deliberate and strategic, and seek to define places with identity, character and a sense of place. Intensification of the middle ring provides the opportunity for true urban renewal and must not be seen as just ‘development’. This requires careful and contextual master planning and high quality urban design and public authorities to adopt a more proactive approach to unlocking the potential of established suburbs.

Climate change

Climate change presents one of the greatest risks, if not the greatest risk to the city’s infrastructure assets. We should not only be aiming for a low carbon future, but also be seeking to mitigate and manage the risks and impacts caused by a changing climate, such as rising sea levels and coastal inundation, water scarcity, severe weather events, urban heat island effect and biodiversity loss.

It is also noted that the ‘resilience’ of Melbourne to physical, social and economic challenges is not referred to in the key challenges. Resilience goes beyond climate change; and is the ability of people, property and infrastructure within our communities to anticipate, avoid, adapt, and otherwise mitigate and bounce back from the shocks and stresses that will become increasingly prevalent throughout the 21st Century, in a manner that minimises any governance, social, economic and environmental burden.

AILA recommends that the ‘resilience’ of Melbourne to physical, social and economic challenges be added to the ‘key challenges’.

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:

AILA supports the reference and alignment of the UN Sustainable Development Goals (SDGs) within Plan Melbourne 2016. The Strategy's acknowledgement and inclusion of the SDGs should be made apparent in the document's introduction. It would be valuable if each of the 17 SDGs were referenced under the relevant Objectives and Outcomes section and expanded upon as a direction in order to clarify how each SDG can be achieved for Melbourne.

Other upcoming Federal Government policies may also be relevant to Plan Melbourne 2016 and/or referenced include the Urban Design Protocol for Australian Cities and the 15 Year Australian Infrastructure Plan.

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:

It is critical for the health and future success of Melbourne that the Victorian Government and all related bodies take a strong stance on establishing a fixed, non-negotiable urban growth boundary. Acknowledging that there has been much movement in the urban growth boundary within recent years, it is perhaps even more important to articulate the objectives that dictate how the boundary is defined and what the proposed triggers for adjustment are.

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?

Melbourne is consistently voted as one of the world's most liveable cities. The AILA considers that the green wedge zones created under the long-term vision of former premier Sir Rupert Hamer in the 1970's are major contributors to our liveability and landscape quality, and have well stood the test of time. Our concern with Melbourne 2014 was that it appeared to imply that the city's green wedges be exchanged for creating a green edge to the metropolitan boundary of the city. This does not address the need to maintain and improve the quality of natural environments within the city.

AILA agrees that the values of green wedge and peri-urban areas need to be identified by Plan Melbourne 2016 to better preserve these important fringe zones from outward expansion and inappropriate development. In particular, areas with significant natural character and resources, agricultural and rural industries, and environmental features need to be recognised. Consultation with local councils needs to be undertaken to review existing values of green wedge and peri-urban areas.

- Preserving and managing ecological areas and important landscapes both within the city and within close proximity to the city is crucial. These spaces are a critical part of the liveability of our cities and provide a range of health and wellbeing roles which are essential to ensuring that our society has happy, healthy and productive people contributing in a positive way to our society.
- Melbourne 2016 metropolitan strategy must recognise that natural environmental systems are integral to the health and function of the city.

AILA agrees that the value of the edge-of-city landscape, green wedges and peri-urban areas needs to be recognised and elevated in public consciousness, clarifying its importance as a productive, recreational or environmental asset. A good first step in raising the value of the 'green wedge' and 'peri-urban areas' may be to rename them, in plain English, to be more descriptive of their higher order use. In the Ruhr in Germany, the concept of a 'landscape park' was established to define the connected system of landscape, which included rural and agricultural, industrial uses, recreational assets and environmental corridors. This connected the landscapes on the edge of the conurbations and the strategic landscape and water corridors, 'green wedges' and significant formal park assets.

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 AILA agrees that the Economic Triangle concept plan is vague and road-focused. The proposed elements for a 2050 concept map appear suitable and should include greater detail regarding active and public transport connections for the proposed clusters, precincts, and activity centres. Strategic and significant landscape corridors should be identified.

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:

The notion of a 20-minute neighbourhood is powerful but certainly requires clarity. The proposed definition and example image is an improvement on the existing explanation; however further detail is required if the principles are to be successfully applied.

- A high quality public realm is essential to the success of the 20-minute concept and should be emphasised strongly in the strategy. Well-designed streets, squares and parks help create inviting, safe and vibrant urban environments which are essential for healthy and connected communities and strong economies. Public realm and green infrastructure needs to be planned for and invested in early.
- The creation of quality public places as an intrinsic part of the suburbs is important if we are to create distinctive places, rather than monotonous outer suburban sprawl, and encourage people out of their cars.
- It is critical that suburbs throughout Melbourne are walkable, have a strong sense of place and an inviting, safe public realm to foster cohesive communities and strong economic activity in neighbourhood centres and high streets.

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:

AILA agrees that the proposed inclusions would strengthen Plan Melbourne and offers the following for consideration.

- AILA strongly supports the inclusion of climate change as a key concept within Plan Melbourne 2016. The AILA recommends ensuring that there is a strategic action plan to ensure the city evolves in response to future environmental challenges. The effects of climate change, including an increase in the intensity and frequency of extreme weather events, average air temperatures and rising sea levels may have significant environmental and economic impacts for Melbourne in the future. Consultation needs to be undertaken with industry experts to ensure there are appropriate guidelines in place to help the city adapt responsively.
- Globally, there is a transition away from single function 'grey infrastructure' (such as roads or sewers), to more multi-purpose 'green infrastructure' (living network of green spaces, water and environmental systems). As described earlier green infrastructure offers a working landscape and a sustainable alternative to traditional engineering. Plan Melbourne should consider highlighting the critical role that green infrastructure, open spaces and natural

resources play in addressing climate change impacts - and that embedding landscape led design thinking in all projects will provide greater resilience across built and natural systems.

- Many of the issues tabled at the Plan Melbourne 2016 Workshop attended by AILA in relation to climate change focused on fringe/peri-urban areas. If 70% of development occurs within existing areas then AILA believes greater focus needs to be placed on urban renewal.
- The inclusion of 'People Place and Identity' as a new chapter is supported, in particular the recognition and incorporation of Indigenous cultural values into the planning system. It is also agreed that place, identity, and good design should not just apply to neighbourhoods, but to all types of infrastructure and built environment projects.
- Partnership with local government is critical to the successful implementation of the initiatives set out in Plan Melbourne and is an important inclusion within the Strategy. By their nature, local government have a fuller understanding of their local environments, challenges and opportunities and should not be excluded from major decisions that will impact their communities.
- AILA promotes the importance of achieving high quality design and believes that all significant public interventions and projects are designed to achieve maximum public benefit for the public of Victoria. Policies at a state and local level should define design excellence more clearly. It is essential that multi-disciplinary independent expert design review of significant public projects, urban renewal and urban growth master plans, and private sector proposals of high impact, is undertaken from the early stages of projects. This will ensure they realise their full potential and achieve best value for the Victorian public.

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

Plan Melbourne 2016 should advocate for strategic planning and design of new activity hubs to aid integration of surrounding areas, reinforce existing neighbourhood character and provide placemaking opportunities to strengthen the identity of local communities.

AILA advocates for green space and urban forest strategies to be undertaken in every municipality, with consideration of anticipated future population growth. These strategies will ensure the right quantity, quality and diversity (scale, typology, character) of public space is being provided as a connected public space network for all urban areas. City of Melbourne has piloted a model that is now being taken up by other Local Authorities. Working across the boundaries of municipalities is essential to reflect how people live and to deliver green space in the right location.

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?*

Crucial to the success of innovation and knowledge-based clusters is the quality of the built environment that defines the setting for employment and mixed use. A spatial vision that proposes the quality and form of place is essential to attract investment.

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:

AILA suggests that while core institutions and businesses may be the 'anchors' of the National Employment and Innovation Clusters, these areas must offer opportunity for all scales and types of economic activity and seek to be truly mixed use. Quality of place is essential to attract core institutions and businesses, as well as accessibility to markets.

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?

While we agree that the Werribee National Employment Cluster include the Werribee Activity Centre and Werribee Park Tourism Precinct, AILA strongly advocates for strong public transport connections to be enabled between the existing employment cluster and the central area. Planning mechanisms must ensure that the higher order corporate and civic institutions, and regional retail uses are

prioritised for the central area and not the employment precinct. The role and function of each of these places should be strongly defined so that they work in a beneficial and non-competitive way. Investment in connecting infrastructure is essential.

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?

AILA supports the broadening of the Dandenong National South Employment Cluster to include the Dandenong Metropolitan Activity Centre and the tertiary and knowledge-based organisations that exist or may be attracted to Dandenong. We advocate for sustained investment in significant infrastructure to connect the expansive and highly important manufacturing area to the central area. If Dandenong is to be Melbourne's 2nd city or the City of the South, there needs to be a continued commitment to bring corporate, regional retail and core institutions into the central area. The previous investment into Dandenong Metropolitan Activity Centre by State Government and facilitation of business and government institutions should be continued, to ensure the primacy of the City Centre and enable its role as a major centre. The urban hierarchy, role and function of each of these places should be strongly defined so that they work in a beneficial and non-competitive way.

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?

AILA supports the proposal to develop clearer policy and tools for identifying and establishing activity centres. Modification of the existing criteria to include consideration of activity centres in the delivery of "a network of 20-minute neighbourhoods" is logical.

- This strategy should overlap with housing policy to articulate preferred building scale and level of intensification.
- It is important that the strategy clearly defines specific locations for higher density living. Without this, ad hoc and dispersed high density residential development can quickly diminish valued characteristics of cities. Sydney suffers from this and has a poor urban form in parts resulting from this more market driven approach. Melbourne does not want to follow in Sydney's footsteps and diminish many of the qualities which define it as a highly liveable city.
- AILA advocates for design-led master planning to propose the future urban form and structure of neighbourhoods and offer a clear vision to the community of their future suburb. Height and built form should not be contested on a site-by-site basis, but determined through

contextually responsive, 3-dimensional propositions at the neighbourhood/ municipality scale led by public agencies.

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?*

ALLA supports the proposal to protect strategic agricultural land recommends that a proportion of this land is absorbed within the UGB and protected from development. We note, and are concerned by, the fact that many of Melbourne's food producing areas were included in the latest expansion of the growth boundary.

Agricultural areas absorbed within the UGB could feasibly form pockets of productive green space within the city, providing employment opportunities, minimising transport distances for food supply, and providing sources of food production if supply chains to the city from further afield are affected.

There are opportunities for integration of infrastructure as part of future development in these areas to support agriculture. Werribee may be a good example of this, where food production is linked with the treatment plant.

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)?

It is critical than Melbourne invests in new infrastructure early, especially as part of major urban renewal projects. The role of Infrastructure Victoria should be highlighted to ensure infrastructure decisions are taken out of the political cycle. Transport infrastructure should unlock housing and economic opportunity.

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?

AILA notes that if the strategies set out in Plan Melbourne 2016 such as the 20-minute neighbourhood and poly-centric city are to succeed, it is critical that the Principle Public Transport Network should inform land use choices and decisions. The 20 minute neighbourhood approach will create compact, mixed-use communities near transit where people enjoy easy access to jobs and services. These neighbourhoods will be desirable places to live, work and visit that feature amenities like entertainment venues, parks, retail, restaurants, an improved pedestrian environment and diverse housing choices.

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?

It is imperative that Plan Melbourne 2016 identifies strategic connections for pedestrians and cyclists in order to achieve many of the stated outcomes within the metropolitan strategy. Integration of walking and cycling networks with land use should be guided by the following principles in order to achieve the best possible outcomes for Melbourne.

Walking and cycling networks should:

- Function as integral components of local and regional multi-modal transport networks, guided by relevant urban design and planning strategies.
- Capitalise on the potential for integrated design of 'grey' and 'green' infrastructure networks (as described earlier) to deliver multi-functional performance outcomes – e.g. combining transport, access and services provisioning, energy efficiency, climate adaptation, habitat connectivity, economic opportunity, recreational potential, air and water quality benefits and artistic/cultural expression within the design solution.
- Deliver a public realm which contributes to the improved viability of commercial premises located along transport routes.
- Provide active transport networks that enhance mobility, connectivity and reduce congestion within and between our cities and settlements.
- Support safe, attractive, convenient and accessible mobility options for all members of the community - including pedestrians, cyclists, children and the elderly.

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

How does Plan Melbourne 2016 capture the outcomes of the 15 year Australian Infrastructure Plan?

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?

AILA agrees in principle with a 70/30 housing supply target, although suggest more could be delivered in established areas.

When considering increased density within established areas, AILA advocates for retaining and enhancing significant quality open spaces which contribute to a neighbourhood's unique sense of place. AILA recommends defining a network of public open spaces, informed by a green space strategy (as previously outlined). In some cases, it may be possible to enlarge existing parks, repurpose streets or redesign open spaces within established urban areas to maximise their flexibility and robustness to meet the needs of a larger and more diverse population. Opportunities for new public spaces should also be enabled.

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

AILA recommends limiting the supply of land on the periphery.

While not a planning reform, AILA also advocates for public agencies (State and Local) to work collectively to unlock urban renewal opportunities through master planning, planning frameworks and processes, which provide certainty and clarity to the market.

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?

AILA agree that the sequence and density of the Precinct Structure Plans (PSPs) should be managed

Plan Melbourne Refresh: Discussion Paper Submission

carefully. The lack of constraint and complexity on greenfield sites relative to inner urban renewal, particularly where there are existing communities, means that greenfields will always be an easier option for volume housing. Constraining supply is one way to enable alternative housing models.

A key concern is that in many growth area contexts, housing is provided well in advance of the crucial facilities that are required to develop good neighbourhoods and suburbs. AILA advocates for Government to purchase key strategic sites in growth area town centres and neighbourhood centres, and to bring forward delivery of key community and civic facilities.

AILA also advocates that the two dimensional nature of PSPs needs to be addressed and that a more place specific and three-dimensional approach is required to enable places with a strong urban structure and identity.

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?

If many strategies within Plan Melbourne 2016 are to succeed it is critical that specific locations are identified for growth and intensification within established areas. Not only is this a logical way to capitalise on existing infrastructure in a methodical way and direct development towards a poly-centric city, but these locations must be planned and designed well in advance to ensure future infrastructure needs, including quality public realm and open space, can be adequately planned for and met.

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?

Housing targets need to be set for metropolitan Melbourne, and each region should demonstrate how it intends to deliver its share of housing, based on the land opportunity and contextual issues in each municipality and region. Targets should be monitored and reassessed biannually to respond to

changing contexts and incentives for achieving housing targets may be offered. AILA advocates for targets to be translated spatially. Municipalities should demonstrate through urban design frameworks and contextually responsive master plans, the form and structure of development proposed across their municipality and establish planning controls to provide certainty and clarity about yield and design outcomes.

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?

AILA notes that the defining of locations for growth and planning protection must be evidence-based. These decisions have to be informed by rigorous and expert urban design and heritage assessments and strategies on a municipal level.

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?

The protection of suburbs from inappropriate development needs to be evidence based and not be blanket overlays across large areas. While it is essential that communities are engaged in decision-making about their neighbourhoods, there needs to be strong leadership in demonstrating the opportunities of increased density, rigorous spatial and character analysis to inform appropriate locations for development, and great design to realise high quality outcomes that do not undermine the underlying assets of each place.

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?

AILA suggests that housing diversity targets should be set across municipal areas or relative to the scale of development, detailing potential percentage splits of different typologies/bedrooms/lifetime homes etc.

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?

In the UK, Housing Associations have played an increasing role in providing both private sale and social housing, and were supported centrally by the Housing Corporation (now Homes and Communities Agency). More support is needed to enable Housing Associations to play a larger role in the Victorian market.

In areas in London, all development over a certain scale (over 10 dwellings) had to provide a percentage of affordable housing. This may be achieved through partnerships with a Housing Association. There are also many 'key-worker initiatives' in the UK, which may provide valuable references.

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

The setting of high quality design and sustainability housing standards is essential. AILA outlined their support for Better Apartment standards in a formal submission to DELWP. Design review should play an important role in supporting better outcomes in multi-unit residential projects. If higher density projects are to be accepted at a local level, they need to demonstrate contextually responsive and high quality design. The cumulative effect of poor quality higher density development could have negative effect on local land values and more community resistance to future intensification.

AILA also advocates for the introduction of more diverse housing typologies across Melbourne. The podium tower has become a standard model. Planning controls should ensure that they encourage contextually specific responses rather than mandate a formal envelope or typology.

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?

The AILA supports the inclusion of environmental principles in Plan Melbourne 2016 to provide more detailed guidance as to how environmental sustainability can be integrated into planning considerations.

- An integrated approach to environmental management across Melbourne is essential for optimal environmental outcomes.
- This is also an opportunity to incorporate the UN Sustainable Development Goals into Plan Melbourne 2016.

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?

AILA strongly agrees it is important for planning tools to reflect hazards accurately so that decisions are well informed to mitigate and manage these risks. Explicitly acknowledging the challenges of climate change and the associated hazards and risks is important to encourage development of programs for their mitigation and/or management and inclusion of necessary costs in budgets.

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?

Given the uncertainty around future climate change impacts and the rapidly changing population and growth of the city, it is necessary for the planning system to be regularly updated to reflect best practice and latest research data to support effective planning decisions for our communities' future well-being.

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?

The criteria proposed provide a good reference document of hazard considerations and how to respond and may better inform decisions and design outcomes. Active management of areas exposed to natural hazards is essential, to anticipate risks and avoid or mitigate them. In addition:

- The integration of an updated State Water Plan and associated planning framework into Plan Melbourne 2016 is critical in articulating the important role water has in ensuring a liveable and sustainable city into the future. AILA supports integrated water management that extends from catchment scale to the fine scale of urban landscapes.
- Community resilience, sustainability and liveability will depend on a hybrid of urban water systems comprising multiple water sources at multiple scales, using multiple technologies. Green infrastructure will have an important role.
- AILA supports the integration of water planning and land use planning to allow the creation of multifunctional landscapes created through the application of water sensitive urban design.

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?

AILA supports the inclusion of an infrastructure resilience test within the Strategy that is applied to all existing and new infrastructure and capital works projects. AILA suggest that achieving more integrated outcomes in all new infrastructure – considering technical, urban design, architecture and public realm, rather than just civil works, may improve their resilience.

AILA agrees with the concept of planning authorities applying a new Australian Standard for Climate Change Risk Approach - across both levels of government. This resilience test should also incorporate the principles of 'green infrastructure.' Embedding nature into our traditional 'grey infrastructure' systems (i.e. road and rail networks and port development) is not a new concept. In addition to the amenity, health and well-being benefits, green infrastructure can protect against flooding, excessive heat (urban heat island impact) and other climatic variables, and can provide alternative water

sources to supplement potable water supply.

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?

Urbanisation is a major cause of habitat loss; biodiversity protection in our cities is essential. AILA strongly advocates for improved habitat and biodiversity outcomes across the city and peri-urban areas. Habitat corridors are one way of achieving this. Other strategies might also be effective, including conservation of non-key habitat areas to ensure continuity of habitat, and management strategies to support wildlife (e.g. dog and cat bans). As proposed, a new Victorian Biodiversity Strategy is critical and should be a priority to ensure protection and enhancement of our natural resources and significant environments. AILA is interested to see what the new Victorian Biodiversity Strategy will cover.

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?

- AILA recommends that Green Infrastructure be explicitly referenced in the Plan Melbourne 2016 or any future implementation plans to ensure Green Infrastructure is given due consideration in the planning and design process and the required investment.
- Strategies to cool cities should be broadened to include all 'green infrastructure' including open space provision, waterways, trees, state/national parks - in addition to green roofs and facades.
- Street trees across all Melbourne must be healthy, functioning trees with a quality canopy cover that ensures maximises shade provision. This could be supported by the development of a Shade Policy for Melbourne and a change in practices that impact on the shape and functionality of street trees. A cost benefit/risk benefit analysis needs to consider the long term benefit of canopy trees in ensuring liveability versus current guidelines that seek risk mitigation for events that rarely occur in the city (i.e. fire and death by electrocution).
- AILA strongly supports increased tree canopy in both public and private realms, and advocates for the establishment of ambitious future targets for canopy cover in each municipality, building on a mapped baseline of existing cover. There should also be reference to the greenhouse gas reduction properties of trees via carbon sequestration.
- AILA recommends that key greening initiatives such as the 'Greening The West' project and

the proposed Melbourne Boulevard Strategy are supported. This will ensure that street trees are considered and valued by all, including service and other state government authorities that have guidance relating to tree planting.

- Providing vegetation cover and adopting Water Sensitive Urban Design (WSUD) approaches (including permeable ground surfaces throughout urban development) is critical to balance the environmental impacts of increased density and to support a resilient, liveable and productive city. AILA advocates for WSUD requirements being included in a state-wide planning policy as there are significant gaps in developments that are not triggered by the existing provisions.

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?

Planning policy should support and encourage reduced emissions and increased development of renewable energy to address climate change risks and ensure a healthier future for our communities. In addition, as other industries decline, there is great potential for economic and job growth in low-emission and renewable energy industries. Further, policies should highlight opportunities to support low carbon strategies within local government that contain programs and projects with CO2 reduction targets (e.g. take-up of solar water heaters, photovoltaic systems, and retrofit of commercial buildings).

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?

AILA agrees that the structure planning process should facilitate the uptake of renewable and low-emission technologies; however we believe the definition should be expanded from “in greenfield and urban renewal precincts” - as it should apply to all of Victoria.

Where development of scale is occurring, whether it is a large site, urban renewal precinct or urban

growth area, precinct-wide systems should be incentivised.

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?

- AILA advocates for stronger mandatory ESD standards via the planning scheme and/or building regulations in line with international standards.
- There is a strong case for state controls around this issue rather than relying on individual councils to develop their own standards. An integrated approach across Melbourne (and Victoria) is essential.
- The private market is already leading in this area, and Australia is typically behind when compared to international standards around ecologically sustainable development (ESD) and energy efficiency. Victoria should seek to be the leader in Australia.
- Consideration should be given to deleting the phrase "...including consideration of costs and benefits" as it implies ESD is more expensive.

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

AILA supports continuation of the development of the Metropolitan Open Spaces Strategy and Melbourne Boulevard Strategy. Increased populations will place greater demand on existing open spaces. Meeting needs for the health and well-being of the population will require creating new open spaces and investing in improved management of existing spaces to maintain and increase amenity. To best integrate open space development with the growth of Melbourne, a metropolitan open space strategy should be coupled with the Metropolitan Planning Strategy.

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?*

Once appropriate standards are in place to uplift the basic amenity of apartments, it is essential that Local Authorities be supported in their assessment of multi-unit residential applications, to ensure contextually responsive and high quality design – leading to a better acceptance of higher density development by the general community.

In Sydney, independent design review panels seek to support Councils in their decision-making regarding design quality, and also aim to expedite the application process. In the UK, the Building for Life standard defined a set of criteria to meet in terms of housing quality, but individual assessors provided assessments of whether a certain standard was achieved.

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

Melbourne is known as a 'design city', and it is currently part of its competitive edge. Plan Melbourne 2016 should elevate the importance of achieving design quality and promote processes which support high quality and integrated design outcomes, such as building design capacity in Councils and expanding the use of independent expert design review panels.

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?

AILA advocates for the following:

- Clarity about how each task is contributing to the high level ambitions of Plan Melbourne 2016.
- Bi-Partisan support to provide those delivering Plan Melbourne 2016 confidence to deliver.
- Political leadership and courage at a state and local level.
- Exemplar projects which demonstrate high quality design outcomes.
- Clearly defined responsibilities and time-lines.
- Time-lines that reflect the complexity of tasks and importance of getting it right in terms of outcome.
- Engaging the planning, development and design industry to partner with public agencies to deliver future Melbourne.
- Engaging the community in creative and informed processes.
- Monitoring, celebrating and communicating progress.

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

- Effective implementation relies on all the government agencies working together to achieve the same outcomes. At present there is a large degree of 'siloing' which can prevent beneficial outcomes from being realised.
- The role of local governments in assessing quality design outcomes should be reviewed and strengthened. The role of the established Victorian Design Review Panel should be strengthened for significant public and private projects.
- A requirement for good design should be embedded more strongly within planning legislation, so that good design is a key pillar of Melbourne's growth and is incorporated into projects with a wide variety of scales.
- A series of urban indicators which can be easily and clearly communicated to the Melbourne community is vital in measuring success and providing a basis for ongoing debate and commitment to direction.

Plan Melbourne Refresh: Discussion Paper Submission

- AILA sees great value in setting ambitious targets regarding canopy cover, biodiversity, urban structure (eg 100% of houses will be X mins walk from a green space or public transport connection). Without clear and ambitious targets, a business as usual approach may be the outcome.