

CITY OF MELBOURNE COMMENTS ON PLAN MELBOURNE

December 2013

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1. EXECUTIVE SUMMARY

Thank you for the opportunity to provide Council's comments on *Plan Melbourne (‘the Plan’)*.

Council looks forward to the opportunity to work with the Victorian Government to progress the key areas of support for the Plan, address areas where we think priorities in the Plan need to be reconsidered and to provide assistance in areas where further work is required to finalise and implement the Plan.

A summary of our comments are outlined below.

Key Aspects of Plan Melbourne Supported

1. Alignment with City of Melbourne’s strategic directions for city growth

Plan Melbourne aligns strongly with the strategic directions of the City of Melbourne’s Municipal Strategic Statement, Transport Strategy and structure planning for the city’s urban renewal areas. Council appreciates that many of the ideas in the City of Melbourne’s submission to the discussion paper, ‘Melbourne, Let’s Talk about the Future’ have been incorporated in *Plan Melbourne* including the 1200 Buildings Program and the Future Living housing discussion paper.

2. Establishing a Metropolitan Planning Authority and Central City Subregion

Council supports the establishment of a Metropolitan Planning Authority (MPA) to coordinate government departments and agencies and work directly with local councils and communities to plan a pipeline of projects in the urban renewal areas, and the creation of a new Central Subregion comprising the five Inner Melbourne Action Plan (IMAP) municipalities of Melbourne, Port Phillip, Stonnington, Yarra and Maribyrnong, as one of five metropolitan sub-regions.

Together these provide a governance and administrative framework to support collaboration between state government and the IMAP group of councils to implement Plan Melbourne, coordinate their respective investment decisions and align these with government and private sector interests.

If the MPA is enabled to succeed as a bi-partisan authority that supports a long term strategic investment ‘pipeline’ for all sectors it will play a critical role in delivering a vibrant and sustainable future Melbourne.

3. Doing a Central Subregion strategic growth framework plan

Plan Melbourne’s proposal to do a strategic growth framework plan for the new Central Subregion will enable the City of Melbourne and the other IMAP councils of the Subregion to provide visionary leadership and direction in city-shaping initiatives to support sustainable and vibrant inner city growth.

4. Using value-capture to change the way city-shaping infrastructure is funded

This is critical in incentivising the private sector to invest in urban development and to more directly connect the costs of infrastructure delivery to those who benefit from it. This approach is used internationally to deliver significant infrastructure such as public transport and would help to secure the delivery of the necessary infrastructure outlined in the Plan.

Suggested Plan Melbourne priorities to review

5. Elevate the priority of social and affordable housing targets, definitions and delivery

The City of Melbourne has been involved in social and affordable housing initiatives for many years through the Inner Melbourne Action Plan, our recently released the *Future Living* housing discussion paper and now with the preparation of a Housing Strategy.

The aims of our MSS and structure plans for Southbank, City North and Arden-Macaulay is to accommodate new high-density residential communities and achieve better social and affordable housing outcomes in these urban renewal areas. However State Government's support and leadership is required to achieve these for the subregion. A joint Central Subregion plan should build on the work already done by the IMAP Councils to deliver substantial social and affordable housing outcomes using the State planning scheme framework and other policy initiatives.

6. Elevate the preparation of a Central Subregion plan to a short term priority

The establishment of a Central Subregion will facilitate a collaborative and strategic focus on this rapidly developing region. The area has a unique labour market, high job density, a distinctive profile of knowledge economy jobs, a characteristic pattern of medium and high density residential settlement, and a high degree of accessibility by public and private transport networks.

There is an immediate priority to prepare the proposed strategic growth framework plan (1.4.2) for the Central Subregion 'to accommodate at least one million jobs and nearly one million people'. This is crucial to inform key transport and community infrastructure investment and development decisions in the short term and to provide clear guidance to the community.

7. Elevate the Melbourne Metro rail project to a short term priority

A higher priority for the Melbourne Metro Rail project is critical so that its broad benefits flow across the transport network in the short term to underpin investor confidence and provide clear direction for stakeholders the inner urban renewal areas. This project is currently listed as commencing in the medium term (2017 – 2025) for completion in the long term (post 2025).

The delivery of the first stage of this project (from South Kensington to Domain) will significantly augment peak services and capacity of the metropolitan passenger rail system in the north and west. The development of Arden station in the Arden Macaulay urban renewal area and close to E-Gate urban renewal area is critical to support land use transition and service growth in these areas. The Melbourne Metro project is also acknowledged in the Plan as 'a vital pre-cursor to future rail extensions including to the Melbourne Airport, Doncaster and Rowville'.

8. Review priority for Part B of the East West Link

Commencing construction of Stage 1 of the East West Link is included as a short term action. On 27 August 2013 Council resolved to not support the East-West Link project as announced. This includes both Part A (from Hoddle Street to Parkville) and Part B (Parkville to the Port of Melbourne – Footscray Road). In addition the construction of Part B is considered premature as this section duplicates an existing freeway standard road that may well be able to service this same connection for the medium term and even beyond depending on the nature of the long term future patterns of activity and development in the city. At that time the nature of the transport task may have changed

and there are likely to be more technical options available for meeting that task including more sophisticated road traffic management techniques.

There are a number of more pressing transport infrastructure priorities in the short to medium term such as Melbourne Metro, Tram network development, Airport Rail and the Westlink section of East West Link.

In addition, the inclusion of Part B will have significant impacts on the urban renewal of the Arden-Macaulay area, which Plan Melbourne identifies as an area of strategic Central City growth. The construction of a new elevated freeway, or the reservation of this land for a future freeway, would have the effect of stalling growth in this area and compromise other objectives of Plan Melbourne.

Council's MSS and Open Space Strategy envision the development of the Moonee Ponds Creek as a high quality regional open space asset (see item 10 below) running through the Arden-Macaulay, E-Gate/Docklands urban renewal cluster. This will be substantially compromised by the construction of Part B as currently proposed.

9. Strengthen the climate change adaptation and environmental sustainability provisions

Climate change is increasing the likelihood and severity of extreme weather in Melbourne. Designing land use and transport systems for adaptation and resilience to climate change impacts is therefore critical for a sustainable future Melbourne. The Plan needs additional reference to initiatives on flood, heat and bushfire, sea level rise, and extreme weather events.

Provisions in the Plan to support energy efficient building upgrades should be addressed in the short term and the objective to have minimum energy, waste and water standards for all new buildings across greater Melbourne should be strengthened.

10. Give a higher priority to the development of the Moonee Ponds Creek corridor

The Moonee Ponds Creek corridor will provide a much needed green open space, biodiversity and improved bicycle and pedestrian connections through the high density Arden Macaulay/E-Gate/Docklands urban renewal cluster.

A high priority should be given to taking an integrated approach to planning Moonee Ponds Creek and its catchment as the urban renewal occurs in its lower reaches in Arden Macaulay/E-Gate/Docklands. This MPA should bring together all the relevant State Government stakeholders to address the whole of the urban catchment and an integrated water cycle management of the corridor.

Areas suggested for further work

As the Plan evolves and is implemented the City of Melbourne has identified the following areas where it could productively work closely with the MPA and the Central Sub-Regional group of local councils.

11. Develop a tourism strategy for Melbourne

A tourism strategy for Melbourne with input from all key stakeholders is critical for ensuring that this key sector capitalises on the growing international market interest in Melbourne as it continues to grow both its national status and as a truly 'must visit' global city.

12. Identify funding tools to deliver public infrastructure to lead development

Develop innovative tools and mechanisms to create greater funding certainty for the timely delivery of public transport and community infrastructure. This is critical for supporting private investment in job and population growth in the Central Subregion. The introduction of standard development levies of a size that will support infrastructure development would be a beneficial step forward to provide security for financing and eliminate wasteful variation between authorities.

13. Create a 'City of Cities'

Plan Melbourne focuses on the opportunity to grow the overall economic, social and environmental wealth of the metropolitan region and define Melbourne as Australia's leading city-region, and one of the most liveable and prosperous regions in the world. This is driven by the central idea of an 'integrated economic triangle' that connects employment clusters (including the Central City) to each other and to key city gateways, such as ports and airports.

This concept of a polycentric city model is strongly supported and can help to achieve many objectives of the Plan. It will facilitate an approach to better link a series of larger central urban districts to one another on the metropolitan scale. Each larger centre can grow and become a distinct centre, integrated into its specific and distinctive context. Greater clarity, however, is required on the long-term realisation of the 'integrated economic triangle' to ensure that it best achieves these outcomes. A longer term vision of metropolitan Melbourne will need to address the scale of development in each cluster, to potentially create a 'City of Cities' that integrates with the 20-minute city approach. This will require further work to fully understand the potential of this concept for future planning, design and infrastructure decisions for Melbourne.

14. A smart, evolving city

Technology has had a significant impact on the shape of cities in the past. Melbourne needs to embrace technology that can enhance the social, environmental and economic performance of the metropolitan region. It will be important to consider the technology changes that are likely to occur over the 30 year life of the plan and the anticipated effects these will have on the way we live, work and move about the city.

2. LIST OF RECOMMENDATIONS

- Recommendation 1: Include Adapting to Climate Change Impacts as a key concept for 'Planning for Melbourne's Future'
- Recommendation 2: Revise Initiative 1.4.2 to move the preparation of a framework plan for growth in the Central subregion from the medium term to the short term
- Recommendation 3: Add Direction 1.7 Develop a tourism strategy to ensure that this key sector capitalises on growing international market interest in Melbourne
- Recommendation 4: An urgent approach to improve housing design quality and amenity is required. The medium term action needs to be reprioritised as a short term action as a priority
- Recommendation 5: Include environmentally sustainable design features as part of the proposed work to 'improve the quality and amenity of residential apartments'
- Recommendation 6: Reprioritise the medium term action to investigate development bonuses for the delivery of infrastructure into the short term
- [Recommendation 7:](#) Remove Initiative 2.4.1 and focus on stronger planning provisions to achieve quality design and amenity outcomes, and invest in better resourcing of decision making and appeal mechanisms.
- Recommendation 8: Include an initiative to enhance resilience of transport system to accommodate forecast climate change impacts
- Recommendation 9: Review priority for Stage 1, Part B of the East West Link
- Recommendation 10: Bring forward the commencement of construction of the Melbourne Metro project into the short term
- Recommendation 11: Work with the City of Melbourne, stakeholders and supply chains to investigate options for improving central city 'last kilometre' delivery
- Recommendation 12: Adopt a (commonly accepted) performance tool to measure and assess the operation of the existing public transport system and to assess new proposals
- Recommendation 13: Define what is meant by 20-minute city living to enable the short-term progression on this important concept
- Recommendation 14: Strengthen 4.2.3 to cover inappropriate development in areas likely to experience increased flooding, or inundation due to climate change
- Recommendation 15: Give a higher priority for development and management of the Moonee Ponds Creek corridor as major open space recreation corridor serving the Arden-Macaulay area and E-Gate
- Recommendation 16: Enhance Direction 4.8 by adding 'environmentally or ecologically sustainable' design excellence as a core component of good design and strengthen planning scheme provisions to ensure the achievement of resource efficiency and renewable energy/clean energy objectives
- Recommendation 17: Expand the Victoria Design Review Panel role to include review of significant private sector developments

- Recommendation 18: Generally, ensure that all directions consider required climate change adaptation measures
- Recommendation 19: An integrated planning approach to the management of the Moonee Ponds Creek catchment needs to be a high priority
- Recommendation 20: Reprioritise actions to protect waterways and coastlines into the short term
- Recommendation 21: Enhance the food production capability of urban areas within Melbourne, particularly in new high-density suburbs
- Recommendation 22: Re-prioritise the amendment of the Local Government Act 1989 to facilitate the use of Environment Upgrade Agreements beyond the City of Melbourne to the short term
- Recommendation 23: Introduce mandatory minimum energy, waste and water standards for all new buildings across greater Melbourne
- Recommendation 24: Identify and remove regulatory and planning barriers impeding local embedded energy generation and precinct scale energy generation, including electricity and heating/cooling systems
- Recommendation 25: Support investigations into a high speed rail link on the east coast
- Recommendation 26: That standard development contribution levies appropriate to each region be introduced as soon as possible to enable the creation of public infrastructure to support the development objectives of Plan Melbourne.

Sections 3-10 that follow outline the City of Melbourne's comments on each chapter of Plan Melbourne and provide greater clarity on the overview provided above.

Recommendations for changes to the plan are included under the Directions established by Plan Melbourne.

3. INTRODUCTION

The introduction provides a useful overview of the challenges and key concepts for planning Melbourne's future. One gap however, is the lack of emphasis that climate change will have in planning the future of the city. Climate change is increasing the likelihood and severity of extreme weather events. The introduction should address impacts already underway (sea level rise, increase in heat waves and flooding) and introduce a section on adapting to climate change.

Recommendation 1: Include Adapting to Climate Change Impacts as a key concept for 'Planning for Melbourne's Future'

4. DELIVERING JOBS AND INVESTMENT

The City of Melbourne generally supports Plan Melbourne's directions and initiatives to deliver employment opportunities and increase investment in the city however, provides the following comments:

Direction 1.4. Plan for the expanded central city to become Australia's largest commercial and residential centre by 2040.

The expanded central city comprises a defined labour market, a high degree of employment job density, a characteristic profile of knowledge economy jobs, a distinct pattern of medium and high density residential settlement, and a high degree of accessibility afforded by its public transport network and road network. Due to the significant potential for urban renewal the Central Subregion will accommodate a significant amount of future city job and population growth over the lifetime of the Plan.

The employment forecasts in Plan Melbourne for 'Melbourne Central City' or the City of Melbourne area (p. 25) are substantially lower than what has been experienced in the past two decades and the level that the Council has forecast to 2031¹. It is understood that the Plan Melbourne's assumptions are based around a redistribution of employment growth into the emerging and existing 'national employment clusters'. If this occurs it will slow growth in the central city. This needs to be carefully considered in the sub-regional plans to ensure that Direction 1.4 is not undermined or compromised.

The preparation of a strategic growth framework plan (1.4.2) for the Central Subregion 'to accommodate at least one million jobs and nearly one million people' is crucial to inform key transport and community infrastructure investment and development decisions in the short term and to provide clear guidance to the community.

¹ City of Melbourne forecasts (in line with rate of past two decades) is for a growth of 12,000 jobs per annum. Plan Melbourne forecasts to 2051 a growth rate of 9,500 jobs per annum.

Council considers that this rapid growth, the need to understand where development will occur and the need to integrate this growth with the growing transport network drives the need to prepare the Central Subregional framework plan in the short term rather than the medium term.

Given the forecasts provided, it appears that much of the growth in the Central Sub-Region will be in the City of Melbourne area and that employment in other council areas will be relatively stable. This also reinforces the need to bring forward the Metro Rail project into the short-term delivery timeframe (see comments on Direction 3).

Recommendation 2: [Revise Initiative 1.4.2 to move the preparation of a framework plan for growth in the Central Subregion from the medium term to the short term.](#)

Need for additional direction to capitalise on tourism opportunities

Development of the tourism strategy should be a priority for Melbourne to ensure this sector² capitalises on growing international market interest. This should include: tourism planning and development (including accommodation, attractions and infrastructure); transport connections between Melbourne and major international, national and regional centres and the central city; capacity building (skilling the workforce); and investment requirements, policy and instruments.

A Metropolitan Tourism Strategy should include improved and integrated metropolitan-scale way finding system (particularly at tourist gateways) linked to the transport network. This will enable visitors to easily get around the city and ensure that the visitor economy benefits local businesses.

Recommendation 3: [Add Direction 1.7 Develop a tourism strategy to ensure that this key sector capitalises on growing international market interest in Melbourne.](#)

5. HOUSING CHOICE AND AFFORDABILITY

As referred to in Plan Melbourne the City of Melbourne has released *Future Living, A discussion paper identifying issues and options for housing our community, May 2103*. Our aspiration is for an inner and central city where housing is affordable, well-designed and meets the needs of our residents. Many of the directions and initiatives of Plan Melbourne are consistent with *Future Living, 2013* and Council welcomes the opportunity to improve housing choice and affordability in partnership with the State Government. The City of Melbourne is now preparing a Housing Strategy with a draft scheduled for public consultation in Autumn 2104.

While in-principle support is provided to the directions and initiatives in Plan Melbourne they are expressed at a high level and further detail is required to fully understand the Plan's implications and commitments.

There are key areas where the support and leadership of the State Government is now required to achieve better housing outcomes. Plan Melbourne could address this as follows:

² Deloitte's Access Economics forthcoming report on [Positioning for Prosperity: catching the next wave](#). The report says Victoria is well positioned for the next wave, and identifies tourism as one of the State's five 'super growth sectors'.

Direction 2.1 Understand and plan for expected housing needs**Initiative 2.1.2 - Investigate and plan for expected needs across Melbourne's five sub regions**

Council supports presenting housing data at the subregional level however more detail is required on the specific data requirements and its implications for the City of Melbourne and the Central Subregion.

Initiative 2.1.4 - Improve the quality and amenity of residential apartments

The City of Melbourne strongly supports this initiative and actions and will work closely with the State Government to make it happen. As quoted in Plan Melbourne,

"The City of Melbourne's discussion paper Future Living provides a comprehensive assessment of many of the issues that need to be addressed in terms of the quality, design and layout of multi-dwelling / apartment developments"

The City of Melbourne supports the approach of taking into account the New South Wales State Environmental Planning Policy 65 and building on the City of Melbourne' discussion paper *Future Living*, 2013.

Recommendation 4: An urgent approach to improve housing design quality and amenity is required. The medium term action needs to be reprioritised as a short term action as a priority.

Recommendation 5: Include environmentally sustainable design features as part of the proposed work to 'improve the quality and amenity of residential apartments'

Direction 2.2 Reduce the cost of living by increasing housing supply near services and public transport**Initiative 2.2.1 - Facilitate high-density residential development in Melbourne's expanded capital city zone**

The City of Melbourne supports new high-density residential communities in the urban renewal areas of Fishermans Bend, E-Gate and Arden Macaulay. The supply of housing must be matched with stronger control of design quality, amenity (initiative 2.1.4) and affordability.

It is important that the State Government partners with the City of Melbourne to implement its adopted structure plans and planning scheme amendments for the Southbank, City North and Arden Macaulay urban renewal areas. The City of Melbourne is committed to continuing to partner with the State Government on the planning for Fishermans Bend and E-Gate.

More clarity is required on what changes are needed to the current planning provisions. The existing Capital City Zone offers close to maximum development opportunities for high-density. The identified medium term action to investigate the development bonuses for the delivery of infrastructure should be a short term action particularly given the current work being done to reform the Developer Contributions Framework.

Recommendation 6: Reprioritise the medium term action to investigate development bonuses for the delivery of infrastructure into the short term.

Direction 2.3 Facilitate the supply of more social housing

Initiative 2.3.1 - Facilitate growth in the social housing sector.

Council has been involved in social and affordable housing since the mid-1990s when the Inner City Housing Trust (in partnership with the Victorian Government) was established. This Trust is now part of Housing Choices Australia. The City of Melbourne's Homelessness Strategy *Pathways 2011-2013* reflects Council's commitment to creating sustainable pathways out of homelessness.

The City of Melbourne also worked on the Affordable Housing Initiative through the Inner Melbourne Action Plan (IMAP) for many years and requires State Government leadership and support on this issue.

Council therefore supports this initiative and actions and urges the State Government and the Metropolitan Planning Authority to work in partnership with Council and to provide strong support and leadership to put in place mechanisms to achieve and improve social housing particularly in urban renewal precincts.

Direction 2.4 Facilitate the supply of more affordable housing

Initiative 2.4.1 Extend the VicSmart system to multi-unit development

Concern is raised with the proposal to apply VicSmart to multi-unit developments. Code assessment of multi-unit developments (and without third party involvement) cannot adequately address specific site context, the nature and form of development on abutting properties, local amenity impacts, good design principles and neighbourhood character; and it will lead to poor quality design outcomes.

The City of Melbourne recently submitted in relation to VicSmart: *'The City of Melbourne considers that the proposed VicSmart provisions are difficult to understand and sure to result in poor outcomes including needless refusals and appeals against failure to meet the ambitious 10-day time limit. It is our strong preference to work with DTPLI to refine planning schemes to conditionally exempt more matters from requiring a planning permit and to explore ways for all Councils to continually improve the quality of decision making and reduce timeframes to meet customer expectations. This can be done without changes to the relevant Acts or Regulations'*.

Recommendation 7: Remove Initiative 2.4.1 and focus on stronger planning provisions to achieve quality design and amenity outcomes, and invest in better resourcing of decision making and appeal mechanisms.

Initiative 2.4.2 - Increase our understanding of affordable housing in the context of changing household types and needs

Initiative 2.4.3 - Accelerate investment in affordable housing

Through the development of *Future Living*, 2013 the City of Melbourne found that the municipality is becoming a more expensive place to live with housing costs impacting households on incomes up to

\$100,000 per year (*Future Living, 2013*). It is important that the members of our community on which the functionality of the city depends have affordable housing convenient to where they work. These key workers can include emergency workers, nurses, teachers, police, hospitality workers and cleaners.

Council supports this initiative and action. However the policy concept of 'affordable housing' is too limiting. Instead the policy concept of 'affordable living' provides a much more complete and accurate framework for the full costs of living in a particular location, including the additional household costs of transportation.

Plan Melbourne could acknowledge the extensive work already undertaken with the development of *Future Living* and, particularly, by the Inner Melbourne Action Plan as a basis for achieving short term action on this Direction.

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6. A MORE CONNECTED MELBOURNE

The City of Melbourne generally supports the Plan Melbourne directions and initiatives to better connect people to each other and their jobs however provides the following comments:

Direction 3.1 Improve roads in growth areas and outer suburbs

Climate change is increasing the likelihood and severity of extreme weather events. Recent experience shows that the city's transport system is not robust during extremes of temperature and rainfall. Future transport planning and design at interchanges and access points needs to take account of this growing trend.

Recommendation 8: Include an initiative to enhance resilience of transport system to accommodate forecast climate change impacts

Melbourne needs more efficient and effective private vehicular travel and effective and efficient public transport. The development of transport infrastructure should proceed on the basis of the greatest benefit to the growing city. The Melbourne Metro Rail project and the Airport Rail Link are critical pieces of infrastructure needed to protect and enhance Melbourne's competitiveness and liveability and should be given greater priority in the Plan.

The integration of transport and projected population and job growth is not comprehensively addressed by either Plan Melbourne or the Victorian Freight and Logistics Plan. Further policy detail would provide confidence to facilitate sound infrastructure and development investment decisions. In particular, the important role that circumferential bus services could play to connect between Melbourne's radial fixed-rail system and augment tram services should be emphasised.

The provision of adequate public transport services to meet growing demand to both the City of Melbourne and across the whole of metropolitan Melbourne is vital to the success of *Plan Melbourne*. Constrained capacity will result in suppression of growth and increased costs of congestion.

Initiative 3.1.1 Build the East West Link as an integrated transport and land use project

Commencing construction of Stage 1 of the East West Link is included as a short term action. This includes both Part A (from Hoddle Street to Parkville) and Part B (Parkville to the Port of Melbourne – Footscray Road). Council considers the construction of Part B premature in the short term as this section duplicates an existing freeway standard road that may be able to service this same connection.

In addition, the inclusion of Part B will have significant impacts on the urban renewal of the Arden-Macaulay area, which is identified in Plan Melbourne as an area of strategic Central City growth. The construction of a new elevated freeway, or the reservation of this land for a future freeway, would have the effect of stalling growth in this area and compromise other objectives of Plan Melbourne.

Council's priority to improve the quality of the Moonee Ponds Creek as an open space asset (see item 10 below) will also be compromised by the construction of Part B as currently proposed.

Recommendation 9: Review priority for Stage 1, Part B of the East West Link

The City of Melbourne supports better on-road priority for Doncaster Area Rapid Transit (DART) and improvements to Spring Street and Victoria Street are important to achieve this (see City of Melbourne [submission](#) to the Doncaster Rail project).

Council also supports enhanced CBD operation for public transport enabled by changed traffic patterns. There is an opportunity to work with the various state government agencies to set up new processes and ways of improving the central city transport function. This is especially relevant for the operation of streets such as City Road, King Street, Spencer Street, Victoria Street which are now amid new urban growth areas and which now need to not act as barriers to people movement but as connectors between growing areas and as high streets generating economic and social activity.

SmartRoads can assist State and Local Government in the joint management and development of movement in the Central Subregion to give more priority to pedestrians and public transport vehicles.

Initiative 3.1.2 Move towards a metro-style rail system, starting with Melbourne Metro

The City of Melbourne strongly supports transforming the train system into a metro-style train system strongly integrated with urban land development. This position is set out in our [Transport Strategy 2012](#). Melbourne Metro is Council's highest priority transport infrastructure project. This is a critical component of achieving many of the other Directions in Plan Melbourne towards increasing the economic competitiveness and liveability of Melbourne.

Recommendation 10: Bring forward the commencement of construction of the Melbourne Metro project into the short term.

Initiative 3.1.5 Support walking and cycling in central Melbourne

Council supports these short and medium term actions and will work closely with State Government to help make it happen.

The City of Melbourne and the other IMAP Councils have significant expertise in the management and planning of cycling and walking. Council is keen to continue to take a leadership role in this process and work closely with VicRoads building on the City of Melbourne's Pedestrian Plan and Places for People.

Direction 3.3 Improve transport infrastructure and services in Melbourne's newer suburbs

Initiative 3.3.3 Assist the private sector to assess the potential for ferry services in the west of Port Phillip Bay

The planned ferry service across the Bay could have significant value for visitors and enhance tourism opportunities. This initiative is supported and should be integrated into the Tourism Strategy (see Recommendation 3 above).

Direction 3.5 Improve the efficiency of freight networks while protecting urban amenity

Initiative 3.5.3 Manage the impacts of freight movements on urban amenity

As the intensity of the Central City increases and the pedestrian role of streets increases, last kilometre freight delivery will need to be carefully planned so it does not affect amenity and is

efficiently delivered to support central city functions. The City of Melbourne will work with the State Government and supply chains to investigate options for improving central city delivery.

Recommendation 11: Work with the City of Melbourne, stakeholders and supply chains to investigate options for improving central city 'last kilometre' delivery.

Measuring the performance of public transport system

The performance of the public transport system should be measured by a tool that is accepted throughout government, industry and the community generally. An example of such a system is SNAMUTS (though it does not consider capacity). The use of such a tool allows the evaluation of the performance of the public transport system and the comparison of different public transport proposals in terms of how they improve the network.

The development of policy a 'go-anywhere anytime' public transport system for central Melbourne as outlined in the City of Melbourne's *Transport Strategy 2012* is specifically suited to the Central Subregion.

Recommendation 12: Adopt a (commonly accepted) performance tool to measure and assess the operation of the existing public transport system and to assess new proposals.

7. LIVABLE COMMUNITIES AND NEIGHBOURHOODS

The City of Melbourne generally supports the directions and initiatives included in Plan Melbourne to improve the quality of life for all city residents however provides the following comments:

Issues

'A liveable city today, and in the future' should cover issues of adaptation and resilience to climate change impacts.

Direction 4.1 Create a city of 20-minute neighbourhoods

The aspiration of a 20-minute city is strongly supported. However the mode of 20 minute trip is not defined – is this by foot, bike, public or private transport? Additional clarity around this direction, however, is essential to inform the delivery of many of the other objectives in the plan. In order to support and progress the initiatives in this Direction, further information is required.

Recommendation 13: Define what is meant by 20-minute city living to enable the short-term progression on this important concept

Direction 4.2 Protect Melbourne and its suburbs from inappropriate development

Climate change is increasing the likelihood and severity of extreme weather events. Additional reference to this change (including initiatives on flood, sea level rise and extreme weather) should be included in the Plan.

Recommendation 14: Strengthen 4.2.3 to cover inappropriate development in areas likely to experience increased flooding, or inundation due to climate change.

Direction 4.4 Plan for Future Social Infrastructure

Initiative 4.4.2 A Coordinated approach to the delivery of education, health, recreation and cultural facilities

A coordinated approach for social infrastructure delivery is positive but it is unclear how this will be achieved by the limited detail provided in the short term actions. In particular, the delivery of schools in the Central Subregion is critical to supporting family living. This needs to be a key objective of the Central Sub-Region Plan. The collaboration of the MPA and the Department of Education and Early Childhood to ensure integrated investment and planning decisions is essential. This can also link to the opportunity for development bonuses that is suggested in Recommendation 6 above.

Direction 4.5 Make our city greener

The Plan acknowledges the importance of protecting and restoring natural habitats and the value of the City's waterways including the Yarra River and Port Phillip and Western Port Bays. This should be strengthened by specifically highlighting the need and opportunity to restore and enhance waterways in the Central Subregion such as the Maribyrnong River and the Moonee Ponds Creek which will be highly valued recreational assets as the urban renewal intensifies around them.

The Moonee Ponds Creek corridor will play a significant role in the Arden Macaulay/E-Gate/Docklands urban renewal areas providing a much needed green corridor of open space, enhancing biodiversity and providing improved bicycle and pedestrian connections.

Air quality will be improved through city greening – this is not currently referenced in the Plan but would assist in supporting this concept.

Recommendation 15: Give a higher priority for development and management of the Moonee Ponds Creek corridor as major open space recreation corridor serving the Arden-Macaulay area and E-Gate

Direction 4.8 Achieve and promote design excellence

Designing for adaptation and resilience to climate change impacts including increasing weather extremes and in areas likely to experience increased flooding, or inundation, and enhancing the resilience of transport system to accommodate forecast climate change impacts is critical for a sustainable future Melbourne.

Provisions in the Plan to support energy efficient building upgrades should be addressed in the short term and minimum energy, waste and water standards for all new buildings across greater Melbourne should be strengthened.

Recommendation 16: Enhance Direction 4.8 by adding 'environmentally or ecologically sustainable' design excellence as a core component of good design and strengthen planning scheme provisions to ensure the achievement of resource efficiency and renewable energy/clean energy objectives.

Initiative 4.8.1 Promote Design Excellence

The expansion of the Victorian Design Review Panel is strongly supported. This would be even more beneficial if expanded to include significant private sector developments. This could be a requirement for sites or developments of a certain size, or strategic nature, to undergo this review process.

Recommendation 17: Expand the Victoria Design Review Panel role to include review of significant private sector developments.

8. ENVIRONMENT AND WATER

As documented through the State Government's Victorian Climate Change Adaptation Plan, the changing climate will continue to impact Melbourne. All actions within the Environment and Water chapter need to drive proactive adaptation responses to increases in extreme heat, urban heat island effect, bushfire reduced rainfall, increased flash flooding and flooding from sea level rise.

Issues

'Transforming to a More Sustainable City' and 'A Sustainable Urban Structure' should more specifically address adaptation and resilience to climate change impacts.

Recommendation 18: Generally, ensure that all directions consider required climate change adaptation measures.

Direction 5.2 Protect and restore natural habitats in urban and non-urban areas

An integrated planning approach to the management of the Moonee Ponds Creek catchment needs to be a high priority in its lower reaches in the E-Gate/Arden Macaulay/Docklands urban renewal cluster. This should be led by the State Government and address the whole of the urban catchment, include integrated water cycle management and involve all relevant stakeholders. Refer Recommendation 14 above.

Recommendation 19: An integrated planning approach to the management of the Moonee Ponds Creek catchment needs to be a high priority

Initiative 5.2.2 Protect the values of our waterways and 5.2.3 Protect the coastlines and waters of Port Phillip Bay and Western Port

Both of these actions should be reprioritised into the short term and inform the Central Subregion Framework Plan.

Recommendation 20: Reprioritise actions to protect waterways and coastlines into the short term.

Direction 5.3 Enhance the food production capability of Melbourne and its non-urban areas.

An additional initiative to promote food production in the urban area through active encouragement and facilitation should be included.

Recommendation 21: Enhance the food production capability of urban areas within Melbourne, particularly in new high-density suburbs

Direction 5.5 Integrate whole of water cycle management to deliver sustainable and resilient urban development

Include an action to consider areas at risk from sea level rise, king tides and extreme storm events and explore potential solutions. This could also be included in 5.1.2 related to Natural Hazards but expanded to include inner city issues of extreme storm events and flood.

The larger vision ought to be of creating a more resilient city region where the natural environment plays a fundamental role in the liveability for our communities including the benefits of regional networks of green spaces and the integration of green infrastructure within the public and private realms. This requires consideration of open spaces from the bay through our diverse urban areas to the rural hinterland, and includes how water is considered and best utilised within this network (including the permeability of our urban areas, and its collection and re-use of water).

This approach to delivering 'green infrastructure' can reduce the need for expensive 'grey infrastructure (traditional pipe networks etc.), reduce the heat island effect and enhance the wellbeing of communities. It will require a stronger focus on the integrated management of natural assets and water resources than is currently incorporated into the document. The short term goal to prepare a "metropolitan open space strategy" (p 107) is therefore strongly supported. This strategy must consider water management at a metropolitan scale and ensure that the sub-regional plans (which do not align with water catchment areas) consider the objectives of metropolitan wide strategy.

Direction 5.7 Reduce energy consumption and transition to clean energy

For greater clarity we suggest replacing 'clean energy' with 'renewable energy' as the current definition is broad and could be interpreted to include fossil fuels, which are derived from natural sources.

Specific actions are needed to ensure this Direction is achieved.

Land-use and planning play a role in providing clarity, certainty and support for local energy generation including:

- Protecting solar access for solar energy systems
- Zoning that supports local generation, district energy systems and micro-grids
- Supporting distribution of energy generation across boundaries
- Encouraging high levels of energy efficiency and solar system readiness in new buildings
- Providing clarity on heritage buildings and energy systems installations

Appropriate solar access will also help achieve other objectives such as improved energy efficiency of buildings, reduce peak energy demand, climate change adaptation, more green spaces, improved daylight access and general health and wellbeing.

Initiative 5.7.1 Support local governments and the private sector in their efforts to promote energy efficiency

The Local Government Act 1989 should be amended in the short term to enable the use of Environment Upgrade Agreements to expedite building upgrades and to deliver immediate benefits beyond the City of Melbourne.

Recommendation 22: Re-prioritise the amendment of the Local Government Act 1989 to facilitate the use of Environment Upgrade Agreements beyond the City of Melbourne to the short term

The second action relating to energy efficiency upgrades and incorporation of local generators should be strengthened to ensure delivery of high quality sustainable design.

Recommendation 23: Introduce mandatory minimum energy, waste and water standards for all new buildings across greater Melbourne.

There are several existing barriers to the delivery of local embedded energy generation and precinct scale energy generation, including electricity and heating/cooling systems. The identification and removal of existing regulatory barriers impeding this is strongly supported. This includes planning barriers to solar installations that export energy off-site, cogeneration located locally and distributing energy across title, and electricity market rules preventing sharing of locally generated electricity between adjoining buildings.

Recommendation 24: Identify and remove regulatory and planning barriers impeding local embedded energy generation and precinct scale energy generation, including electricity and heating/cooling systems.

9. A STATE OF CITIES

The City of Melbourne acknowledges its position and responsibilities at the focus of the network of a 'state of cities'. We are committed to continue to show leadership, provide direction and work collaboratively with all stakeholders and the broader community in support of a state of cities which delivers choice, opportunity and global competitiveness.

Initiative 6.4.1 Improve transport connections between Melbourne and regional cities

Improving connections between cities will include city-centre to city-centre connections particularly to facilitate business and service-related travel as well as access to entertainment, shopping, sporting and cultural activities which are concentrated in central Melbourne. This will require careful planning of transport hubs, particularly for V-Line train and bus services in the central city and consideration of future High Speed Rail (HSR) into Spencer Street. The HSR studies indicated that the metropolitan public transport system would provide the majority of access to a future HSR service. In the meantime much of the interchange between regional travel and destinations in Melbourne will occur at Southern Cross station.

The City of Melbourne has supported further investigation into a high speed rail link on the east coast. (See City of Melbourne submission on High Speed Rail). Given the timeline for Plan Melbourne, planning for this project could be an important consideration in the planning for Southern Cross Station and its surrounds.

Recommendation 25: Support investigations into a high speed rail link on the east coast.

10. IMPLEMENTATION: DELIVERING BETTER GOVERNANCE

The City of Melbourne has strong relationships with our community, with our key stakeholders, our investors and in-depth knowledge of capital city planning. We will continue to play a leadership role in guiding the planning outcomes of the central city. We are keen to work collaboratively with the new Metropolitan Planning Authority and would seek clarification on how decision making will occur between local government, the Central Subregion, the Metropolitan Planning Authority, the Department of Transport, Planning and Local Infrastructure and other state government departments and agencies. The successful implementation of Plan Melbourne will require proactive leadership to ensure that all decision makers in city planning are involved to ensure the best decisions for the city's future are made.

Early and timely delivery of transport and community infrastructure to service the rapid population and job growth planned for the Central Subregion and across metropolitan Melbourne will serve to underpin the successful implementation of Plan Melbourne. Without this, community and investor confidence will not be sustained at a level that is required to support the Plan's objectives and outcomes.

Further detail regarding feasible options, tools, models and mechanisms providing for new ways of funding the transport and community infrastructure is required. This will be essential to both attract and service the levels of projected population and job growth across the metropolitan area. This

needs to be a key priority of the MPA and State Government to gain community confidence for the direction and implementation of Plan Melbourne.

The release of the Standard Development Contributions Advisory Committee's report *'Report 2: Setting the Levies'* on the preferred new system for standard development contributions levies will enable a greater understanding of how this new system will achieve some of the objectives of Plan Melbourne.

Recommendation 26: That standard development contribution levies appropriate to each region be introduced as soon as possible to enable the creation of public infrastructure to support the development objectives of Plan Melbourne.

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