



18 December 2015

The Hon Richard Wynne MP  
Minister for Planning  
[planmelbourne@delwp.vic.gov.au](mailto:planmelbourne@delwp.vic.gov.au)

Ask for: Natalie Walker  
Phone: 9932 1096  
Our Ref: A2282997

Dear Minister,

**Plan Melbourne Refresh: Discussion Paper**

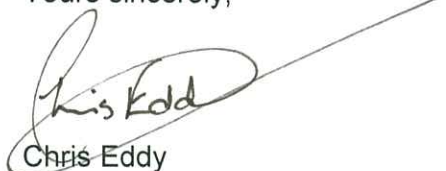
Thank you for the opportunity to provide feedback to the Plan Melbourne Refresh: Discussion Paper.

Hobsons Bay City Council is generally supportive of the options for discussion particularly those relating to housing and climate change. Housing affordability and climate change adaptation are key issues identified in Council's Advocacy Strategy 2014-18. Subsequently Council has been advocating for a State led approach to these issues.

Council welcomes the Plan Melbourne Refresh: Discussion Paper and looks forward to working with the Victorian Government to implement the plan. Comments are provided in an attachment to this letter.

If you would like to discuss this submission further please contact Natalie Walker, Director Strategic Development on 9932 1096 or email, [nwalker@hobsonsbay.vic.gov.au](mailto:nwalker@hobsonsbay.vic.gov.au).

Yours sincerely,



Chris Eddy  
Chief Executive Officer



*Below is the submission provided by Hobsons Bay City Council. The submission responds to the options proposed within the Plan Melbourne Refresh discussion paper (Plan Melbourne 2016) that affect the Municipality and the Western Subregion.*

## **Chapter 2: Growth, challenges, fundamental principles and key concepts**

This chapter sets out the overarching principles for the development of a revised Strategy, and articulates the requirement for an enduring Strategy.

### **Option 5**

**Better define the key opportunities and challenges for developing comprising:**

- **growth and changing demographics**
- **a changing economy**
- **moving people and goods**
- **housing affordability**
- **providing services and infrastructure for communities**
- **low suburban density**
- **climate change**

Council is supportive of the option to better define the key opportunities and challenges provided in the Plan Melbourne 2016. These principles are vital to the growth of Melbourne, any opportunities to provide greater clarity on these issues is welcomed and are discussed further below.

### **Option 6**

**Include the United Nations Sustainable Development Goals comprising economic prosperity, social inclusion and environmental sustainability in Plan Melbourne 2016.**

Council agrees in principle to including the UN Sustainable Development Goals as part of Plan Melbourne 2016 however Plan Melbourne 2016 should not just replicate these goals it should seek to apply them in a local context. In addition, as a mature City within a well established nation, Melbourne should look to exceed them where appropriate.

### **Option 7**

**Lock down the existing urban growth boundary and modify the actions under Initiative 6.1.1.1 in Plan Melbourne 2014 to reflect this.**

The Urban Growth Boundary (UGB) has been 'permanent' for a number of years however numerous amendments have been undertaken by the Victorian Government to expand the UGB and there is concern this may continue to occur. Although not a growth area, Hobsons Bay does have a small portion of land outside the UGB and



Council is supportive of strengthening the UGB. Any future proposed changes to the UGB should require the consent of the municipality where it is being changed, but also seek input into

### **Option 9**

#### **Remove the concept of an Integrated Economic Triangle and replace it with a high-level 2050 concept map for Melbourne.**

Council is supportive of creating a 2050 concept map for Melbourne. Elements that should be included are:

- expanded central city
- national employment clusters
- metropolitan activity centres
- port facilities
- airport facilities
- freight rail
- freeways

The identification of state significant industrial areas should also be included as part of this map however, it should target specific sites or sectors i.e. the petrochemical industry or freight terminal and not industrial areas in general. For example the map for the western subregion on p.176 Plan Melbourne 2014 identifies the entire western industrial precinct as being of state significance. While small business makes a significant contribution to the economic prosperity of Victoria, it is questionable as to whether they are of state significance.

Any map prepared should be clear and easy to read and subject to further consultation before becoming part of Plan Melbourne 2016.

### **Option 10**

#### **Better define the concept of Melbourne as a polycentric city with 20-minute neighbourhood.**

A polycentric city is a city based around a small number of clusters and service centres; this will help with increasing public transport and reducing traffic congestion. This concept is based around 20 minute neighbourhoods. The 20-minute neighbourhoods have been further clarified as providing the ability to meet everyday (non-work) needs locally, primarily within a 20-minute walk.

Council is supportive of an improved and simplified definition of the polycentric city and the 20 minute neighbourhood. The previous version of the 20 minute neighbourhood was ambiguous and difficult to define, whilst the current version is much clearer. However, for those areas of Melbourne with good access to employment, the definition



should identify this and encourage greater pedestrian access to these centres primarily within a 20 minute walking perimeter.

### **Option 11**

#### **Strengthen housing affordability and choice as a key concept and better explain the linkages throughout Plan Melbourne 2016.**

Plan Melbourne 2016 proposes to recognise the role of planning in addressing social and affordable housing needs, providing a stronger focus, particularly on how the planning system might facilitate its supply.

Council agrees that more weight is required on how the planning system might combat the supply of social and affordable housing. However, the current discussion paper does not identify mechanisms and tools in identifying how this supply is to be improved.

### **Options 12 and 13**

#### **Include climate change as a key concept and define how the city can best mitigate, adapt and respond to its projected impacts.**

HBCC is supportive of climate change being included as a key concept and suggests it should also acknowledge the importance of building design and Environmentally Sustainable Design (ESD) in addition to transport and location as important factors to help reduce greenhouse gas emissions. This should be supported by a direction to provide clear policy within the Victorian Planning Provisions, similar to the recently approved local planning policies at Moreland, Port Phillip, Stonnington, Whitehorse and Yarra Councils.

### **Options 14, 15 and 16**

#### **Include the importance of people in Melbourne's identity and place making as key concepts in Plan Melbourne 2016 and update the directions relating to 'Place and Identity'. This includes recognition of the contribution of Aboriginal values and perspectives to the planning of the built and natural environment.**

Plan Melbourne 2016 identifies an opportunity to adjust Plan Melbourne 2014 to provide more of a focus on place and identity, recognising Melbourne's broad range of interests in our community that determine how Melbourne evolves, how it shapes places that meet people's needs, how opportunities are capitalised upon and how future challenges are met.

This concept is supported by Council. As stated in Plan Melbourne 2016, Melbourne's people are its greatest asset and planning for its future should be underpinned by community involvement.



Recognition of Aboriginal values and perspectives in planning is also supported. However, the current legislative framework for requiring Cultural Heritage Management Plans is ambiguous and creates confusion. If there is a clear direction in acknowledging Aboriginal values and perspectives, the planning framework should be altered to accommodate this.

### **Option 17**

#### **Recognise and reinforce the importance of partnership with local government in sub-regional planning and implementing Plan Melbourne 2016.**

The discussion paper identifies partnerships with State Government as being vital to delivering housing and community infrastructure critical for 20-minute neighbourhoods and coordinating people's involvement in planning.

Council looks forward to working with the Victorian Government in sub-regional planning and the implementation of Plan Melbourne 2016. However, there is some concern that this may involve cost shifting onto local government, particularly in a period of rate capping.

In addition, State Government intervention is required in resolving one of the main issues for Council when trying to implement the 20-minute neighbourhood – being planning around pipelines. Hobsons Bay has 13 pipeline operators and 43 pipelines running through its municipality, many through existing activity centres resulting in reduced density and an inability to provide some community services (such as child care facilities).

#### **Other Comments about Chapter 2 'Growth, challenges, fundamental principles and key concepts'**

The application of the new residential zones has been varied, different approaches have been undertaken by various Councils and this has resulted in an ad hoc approach. Plan Melbourne 2016 should provide Councils with better guidance and clarity on the implementation of the new residential zones and Council welcomes the review of the residential zones which should align with Plan Melbourne 2016.



### **Chapter 3: Delivering jobs and investment**

Proposes to create a city that drives productivity, supports investment through certainty and creates additional jobs. The refresh seeks to build on this by providing a number of options for discussion.

#### **Option 20**

**Revise the ‘Delivering Jobs and Investment chapter’ 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?**

Greater definition of the role of National Employment Clusters (NECs), explanation of how NECs and key industries support wider state and federal level economic growth objectives, and potential use of examples or case studies of how clusters can foster innovation and growth would strengthen this section of Plan Melbourne.

In addition, successful business clusters cannot be created solely through land use planning but through a range of supporting initiatives and funding programs. For example, an economic growth framework could be developed across NECs to stimulate and maximise innovation, technology transfer and commercial spin-offs from research organisations to new start ups.

In addition, small, flexible office space or laboratories are often crucial in these circumstances to grow small businesses. Direction within Plan Melbourne 2016 on the range and type of commercial spaces and premises required to support the growth of NECs would be welcomed. These requirements may differ according to the specific context and individual character of the different NECs.

#### **Option 21**

**Comprises two options for 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**

Council supports option 21B, if NECs are to provide the catalyst for sustainable economic development, the broader spatial context of these areas needs to be considered. Not only in terms of ensuring the adequate supply of commercial/industrial land for growth but also to provide vitally important public transport infrastructure to allow equitable access to jobs in these locations. The provision of homes and services in proximity or within the NECs will also be critical to creating sustainable development patterns.



Within the context of creating growth of the NECs, core institutions and businesses should form the focus as key anchors and catalysts however they should be supported by other businesses. They will also require support from the Victorian Government and Councils across a range of regulatory and non-regulatory services (not just planning) to maximise their economic potential and multiplier effects for the wider economy.

### **Option 22**

**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.**

Council is supportive of the East Werribee National Employment Cluster as a catalyst for jobs, investment and growth within Melbourne's West. Council is keen to work closely with the MPA and Wyndham City Council to ensure that residents and businesses within Hobsons Bay can access and benefit from the major economic opportunities presented by the NEC.

It would appear sensible for the NEC to leverage off the existing Werribee Activity Centre within the Cluster to ensure that planning for the NEC takes into account the established centre and opportunities for investment.

The synergy between the proposed NEC and the Werribee Park Tourism Precinct is less clear but investment in transport infrastructure to improve access to the precinct would be welcomed to support the continued growth of the Precinct as a popular tourism destination.

### **Option 24**

**Update the Metropolitan Structure Plan to remove any anomalies and include a list of activity centres into the Victoria Planning Provisions and Planning Schemes.**

Council has three activity centres located within its municipality, being Williamstown, Altona and Altona Gate. It would assist if higher order activity centres are identified within the planning scheme to provide more guidance and certainty for future planning.

### **Options 27 and 28**

**Separately list emerging activity centres and revise the strategic direction for activity centres to remove reference to growth associated with the removal of floorspace caps for retail and office development.**

The continued vitality of activity centres in Hobsons Bay is a critical factor to the overall economic performance and wellbeing of the municipality as well as providing important economic hubs in their own right. Council is supportive of the new criteria for new



activity centres but further clarity is sought on the nature and scope of an 'identified market gap' in order to ensure that the development of new and emerging centres does not impact adversely on the viability of existing centres.

### **Option 31**

#### **Evaluate the range of planning mechanisms available to protect strategic agricultural land.**

Hobsons Bay has no agricultural land however a strengthened UGB could help protect agricultural land and increase food security.

#### **Other comments about Chapter 3 'Delivering jobs and investment'**

There is an identified gap in strategy and policy concerning the development of the NECs from an economic growth perspective. An economic growth framework for the NECs should be developed that covers both spatial and non-spatial aspects of developing successful employment and innovation clusters that coordinates and aligns the actions and funding of the public, private and education sectors.

In addition, business clusters do not necessarily have to be confined to a specific spatial location. There are likely to be synergies and opportunities between businesses across the NECs and outside the NECs in Metropolitan Melbourne and beyond. Investment in public transport infrastructure to physically connect the NECs with the central city as well as the roll out of fibre optic broadband across the NECs will be critical to the future success and competitiveness of knowledge based businesses within Melbourne and should be priority actions for Plan Melbourne 2016.

Sunshine was identified as a NEC in Plan Melbourne 2014 and Council suggest that Footscray could compliment Sunshine by also being classified as a NEC in the central subregion. Footscray has better public transport connections to Hobsons Bay, Moonee Valley and Wyndham, than Sunshine. Footscray is also accessible from Melton and Brimbank.

In addition, Plan Melbourne 2016 provides an opportunity to realign the boundary of the Western State Significant Industrial Precinct to take into account a recent rezoning. Amendment C96 to the Hobsons Bay Planning Scheme rezoned land from Industrial 1 Zone to the General Residential Zone at 222-238 (Hobsons Bay Caravan Park) and 240-258 Kororoit Creek Road, Williamstown North.





## **Chapter 4: A more connected Melbourne**

Plan Melbourne 2016 proposes to provide an integrated transport system connecting people to jobs and services. The refresh seeks to build on this by providing a number of options for discussion.

### **Option 34**

#### **Include the Principal Public Transport Network in Plan Melbourne 2016.**

Land use and transport planning are inter-twined and the Principle Public Transport Network (particularly fixed rail infrastructure) should assist in informing land use choice and decisions. Council supports increased public transport services and seeks the reinstatement of all day direct city services on the 'Altona Loop' (Laverton to Newport shuttle service).

Rail infrastructure is highly visible and by nature is more permanent than bus routes. Consequently the community has a better understanding of rail services. There is greater awareness as to where railway stations are located, when trains will arrive, depart and the route that they will travel. Bus routes and stops are less visible than rail lines and railway stations and can be easily changed. This may undermine the confidence that the community has in the bus network / service.

Public transport options should also incorporate universal design principles to allow those with limited mobility and disabilities to access services.

### **Option 35**

#### **Incorporate references to Active Transport Victoria, which aims to increase participation and safety among cyclists and pedestrians, in Plan Melbourne 2016.**

The Victorian Government has announced a new Active Transport Victoria unit to increase participation and safety among cyclists and pedestrians.

Walking and cycling networks should be highly integrated with land use planning particularly at a neighbourly level to link in the concept of the 20 minute neighbourhood. Walking and cycling should also be a feature of activity centres and take priority over private motorized traffic in centre development. Walking and cycling paths along with buses and trains should be accessible and provide for the safe movement of people.

#### **Other comments about Chapter 4 'A more connected Melbourne.'**

Within the list of rail and road projects that are proposed to be updated in Plan Melbourne 2016, the Western Distributor or the West Gate Distributor have been identified subject to the outcome of assessments underway. Council has advocated for



the prioritisation of the Western Distributor (subject to further improvements) over the previous West Gate Distributor as it provides a better route to the Port, together with less intrusion on the surrounding community.

In addition, Plan Melbourne 2016 should recognise the Western Metropolitan Regional Trails Strategic Plan which is currently being drafted and will provide a defined network of regional trails within the Western Metropolitan Melbourne, specifically referencing the gaps in this provision to address connectivity.



## **Chapter 5: Housing**

Housing diversity in defined locations that are close to services is an important element in Plan Melbourne 2016. The refresh seeks to build on this by providing a number of options for discussion.

### **Option 36**

**Increase established area housing supply by one or more of:**

- **Option 36A: 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.**
- **Option 36B: Investigate a mechanism to manage the sequence and density of the remaining Precinct Structure Plans based on land supply needs.**
- **Option 36C: Focus metropolitan planning on unlocking housing supply in established areas, particularly within areas specifically targeted for growth and intensification.**
- **Option 36D: Identify planning tools and reforms to boost established area housing supply**

The discussion paper recommends that Plan Melbourne 2016 introduce a target to deliver 70 per cent of new housing in Melbourne's established areas and 30 per cent in Greenfield growth areas.

The majority of new residential development should be directed to established locations with good access to existing infrastructure and services. The 70/30 target is roughly in line with what is already occurring however an emphasis should be on the development of infill development being located close to goods and services and not just established areas. The Victorian Government will need to influence the balance of established and Greenfield growth area housing supply to achieve a 70/30 balance, otherwise the actual split is likely to follow the Victoria in Future (VIF) 2015 projections of a 60/40 split.

The city's middle ring suburbs have been identified as a key focus for the 70/30 target. Whilst the middle ring suburbs already support a high proportion of existing housing supply, the use of the Neighbourhood Residential Zone in these areas has 'locked' the majority of land from medium to high density development. Consequently it may be difficult to realise the population/housing projections in these areas.

Precinct Structure Plans are master plans for Greenfield development for whole communities which usually cater for between 10,000 to 30,000 people. They lay out roads, shopping centres, schools, parks, housing, employment the connections to transport and generally resolve the complex issues of biodiversity, cultural heritage, infrastructure provision and council charges. Currently, there are approximately 317,320 lots in approved precinct structure plans which are sufficient to satisfy current demand to at least 2030 and potentially longer.



The most effective method for achieving the 70/30 balance is to exercise greater control on the timing and sequencing of greenfield land release. However, this needs to be carefully balanced with impacts on housing affordability, together with implications and capacity on existing and new infrastructure.

It is unclear what is meant by 'unlocking housing supply' and what this option may entail. Further clarity is required on the '...areas specifically targeted for growth and intensification' to determine if this is referring to land zoned for Residential Growth (RGZ) or underutilised commercial and industrial sites which could be considered for future residential opportunities.

Greyfield renewal (residential areas where the building stock is near or ending its physical life and land values make redevelopment attractive) is discussed as a new initiative at p.57 with Recommendation 21 containing an action (2.2.4-2) to identify ways of unlocking greyfield precincts for medium density housing. Clarification as to whether the action on 'unlocking housing supply in established areas' includes greyfield renewal should be provided.

### **Option 37**

**Comprises two options to better define and communicate Melbourne's housing being:**

- **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.**

Housing targets would define a range of housing outcomes including aggregate housing supply, the mix of housing types needed and preferably housing affordability outcomes. A Housing Strategy that includes a Housing Plan might provide detailed housing information and include preferred housing scenarios for sub-regions, particularly for activity centres and NEC.

Council supports an option which combines elements of Options 37A and 37B.

Option 37A is too reliant on sub-regional aggregate housing targets. As noted in the discussion paper, past attempts at implementing housing targets in Victoria have failed and there is no guarantee that housing targets necessarily achieve their aim. Sub-regional housing targets are too broad based and don't capture the housing needs at the local scale which can vary widely within the sub-regions.

Council is concerned with the reliance on the Victoria In Future data (for housing and population projections) which the current Plan Melbourne 2014 sub-regional targets are based on, as they are usually much higher than what is being experienced at the local level. Council (like many other Councils) use the .ID profiles and forecasts to plan for



population and housing needs and these are usually lower than Victoria In Future projections but better reflect what is being experienced in the municipality.

Whilst there is a concern regarding the use of housing targets, there is a role for housing targets in local housing strategies. Housing targets are useful at the local level as they help identify and quantify current and future housing needs which assists Council's when planning for future housing provisions. However, housing targets are not the only consideration when planning for population growth and housing needs. Information on housing types and affordability is also important as identified in Option 37B. Developing a Metropolitan Housing Strategy that includes a Housing Plan is likely to address housing needs in more detail but must also be done in conjunction with local governments to ensure local level housing requirements/issues are captured.

If a sub-regional approach to housing is to be adopted then it needs to be driven by information and evidence from the local level (a bottom up approach) as this is more likely to reflect housing needs in each area.

### **Option 38**

**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.**

Historically strategic plans for Metropolitan Melbourne have utilised a 400 metre walkable catchment to public transport services and activity centres. While a 400 metre walkable catchment needs to be considered in conjunction with other factors, it provides guidance as to where growth could occur.

Plan Melbourne 2016 should recognise planning tools such as zoning or overlays that accommodate growth or warrant protection. Higher density zones that allow for residential development such as the Activity Centre Zone, Mixed Use Zone, Commercial 1 Zone and Comprehensive Development Zone should be applied to locations where higher scales of change are sought.

Plan Melbourne 2016 should provide a better framework for the application of these tools to better direct growth across Melbourne. To date the roll out of the new residential zones has been inconsistent, with numerous Councils taking different approaches and this has resulted in haphazard outcomes. In a number of instances areas that have been well served by public transport and services have been granted the Neighbourhood Residential Zone, resulting in areas with poorer access to services and public transport being under pressure to accommodate more growth.

The identification of sites where growth could be accommodated cannot be a 'tick box' approach and a variety of factors need to be included as part of any strategic justification.



### **Option 39**

#### **Clarify the direction to 'protect the suburbs'.**

Plan Melbourne 2014 includes a vision to 'protect Melbourne's suburbs'. However, this statement is contradicted throughout the strategy through some directions such as 'plan for jobs close to where people live' which suggests greater density is desirable.

Clarifying the direction to 'protect the suburbs' is a positive change to the current strategy. Planning Practice Note 78 (PPN78) assists Councils in applying the residential zones. As part of the refresh, Plan Melbourne 2016 should build on PPN78 to specifically identify various controls such as the 'character' overlays (i.e. Neighbourhood Character and Heritage) or 'environmental' overlays (i.e. Environmental Significance, Land Subject to Inundation) that warrant protection from inappropriate development.

In addition to this, areas with poor access to services including public transport should be protected from inappropriate development however, a tick box approach cannot be used. In some instances additional development may result in the provision of extra services which could be beneficial to an area.

### **Option 40**

#### **Comprises two options to clarify the action to apply the Neighbourhood Residential Zone to at least 50 per cent of residential land being:**

- **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.**

Plan Melbourne 2014 includes a direction to 'Deliver the Neighbourhood Residential Zone across at least 50 per cent of Melbourne's residential-zoned land.

Council supports the option to delete action 40A. The requirement to apply the Neighbourhood Residential Zone to at least 50 per cent of residential land appears to be arbitrary and included without any strategic basis. It is also at odds with the notion that the new residential zones should be applied based on sound strategic planning rather than aiming for a certain percentage (as discussed on p.57).



## Option 42

**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.**

Council recommends that the action also includes investigating the principles of universal design not just adaptable/flexible design. Dwellings which are universally designed can be used by all people to the greatest extent possible regardless of their age and ability. They are built to meet the changing needs of residents across their lifecycle and allow people to age in place. Additionally Plan Melbourne 2016 could seek to introduce housing diversity targets for larger developments (i.e. over 20 dwellings). Such an approach could include minimum and maximum percentages based on the number of bedrooms i.e. one and two bedroom dwellings should account for between 30-60 per cent of dwellings, three bedroom dwellings should account for 20-50 percent while four or more bedroom dwellings should account for a minimum of five percent of the total stock. These figures are arbitrary and would need to be explored by the department however, this approach provides flexibility for a developer to adapt to the local market while compelling them to provide a certain level of diversity for the community.

## Option 45

**Outlines a number of options to improve housing affordability being:**

- **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.**

Council is currently reviewing and updating its current Improved Housing Choices for Residents on Low Incomes (Affordable Housing) Policy Statement. The outcome of this process will provide direction and clarity for future development and land rezoning within Hobsons Bay.

First and foremost, the definition of affordable housing needs to be determined. Currently the paper is interchanging it with housing affordability which is a very different concept. The plan indicates that it will have an enabling role: this includes facilitating achievement of policy relating to social housing and supporting private development sector to meet housing objectives. This also needs to include support for local government, including legislative changes and frameworks to aid councils in



implementing affordable housing. Council is supportive of the use of Inclusionary Zoning as a measure to delivering affordable housing outcomes.

Council has created a draft definition of affordable housing to assist it in preparing the revised document. The current definition (which is subject to change) is:

***Market Housing***

*Private home ownership where the purchaser's mortgage costs do not exceed 30 per cent of the gross income of the occupant.*

*Rental housing that is owned and managed by private individuals or corporations and where rent does not exceed 30 per cent of the gross income of the household.*

*Both of which are occupied by households in the lower 40 per cent of the income distribution scale.*

***Non-market housing***

*Rental housing that is owned and managed by the Director of Housing, that is occupied by households in the lower 40 per cent of the income distribution scale, and that is managed under tenant selection and rent-setting policies that ensure that occupants do not pay more than 30 per cent of their income in rent.*

*Rental housing that is owned and managed by a not for profit housing organisation, that is occupied by households in the lower 40 per cent of the income distribution scale, and that is managed under tenant selection and rent-setting policies that ensure that occupants do not pay more than 30 per cent of their income in rent.*

*providing*

*Housing choices, which are of appropriate size, liveable, accessible, secure in tenure and located in good proximity to employment services and critical infrastructure such as transport.*

*and is*

*Delivered and managed by not for profit organisations in a manner intended to implement the aims of Council's Health and Wellbeing Plan as amended from time to time.*

There has been a market failure to provide affordable market housing for lower income residents of Hobsons Bay however; Council has a limited role and few policy levers to influence housing markets. Council's Affordable Housing Policy therefore has a primary focus on non-market housing. The way in which Council aims to implement affordable housing is outlined in the guiding actions.





More clarity is also required in Plan Melbourne 2016 regarding affordable housing implementation and exploring the mechanisms available for developers to produce outcomes, particularly the role of Housing Providers.

Empty homes are an issue that can impact on housing affordability. Empty homes are a wasted resource especially in areas where there is demand for housing and the rates of homelessness are increasing. A study undertaken in 2014 by *Prosper Australia* (for the Speculative Vacancies Report 2014) identified over 64,000 properties in Melbourne that were sitting empty. Empty homes create more housing demand and fuel the 'under supply' of housing and impact on affordability. It is recommended that this issue be investigated along with disincentives for homeowners keeping their homes unoccupied for long periods of time. In the UK the Government released a national strategy in 2011 to tackle empty homes 'Laying the Foundations: A Housing Strategy' which outlined a number of incentives and disincentives to help improve the issue.

#### **Other comments about Chapter 5 'Housing'**

Restrictive covenant that either limit one dwelling per lot or mandate minimum house to lot ratios / floor areas, stifle urban consolidation and can impact on housing affordability. These requirements are beyond the scope of Plan Melbourne 2016 however they need to be considered and reviewed.



## **Chapter 6: A more resilient and environmentally sustainable Melbourne**

This chapter is about creating a sustainable city that protects natural assets, better plans water and energy consumption waste management is supported in Plan Melbourne 2016. The refresh seeks to build on this by providing a number of options for discussion

### **Option 46**

#### **Introduce Strategic Environmental Principles in Plan Melbourne 2016 to guide implementation of environment, climate change and water initiatives.**

The Victorian Government is committed to playing a stronger role in helping communities, businesses and government reduce greenhouse gas emissions and respond to the impacts of climate change. Key environmental principles including:

- reducing energy consumption
- optimising water efficiency
- greening the city
- minimising waste
- sustainable urban development

Council is supportive of the Victorian Governments commitment to include environmental, climate change and water initiatives in Plan Melbourne 2016 as they accord with a suite of policies adopted by Council including a Corporate and Community Greenhouse Action Plan, Climate Change Adaptation Plan and Water Management Plan.

The principles including the reduction in energy consumption, minimising waste, responding to climate change are supported by Council however, it is suggested that the principle to optimise water and energy efficiency and minimise waste should be expanded to refer to all fit-for-purpose uses.

### **Option 47**

#### **Review policy and hazard management planning tools (such as overlays) to ensure the planning system responds to climate change challenges.**

Plan Melbourne 2016 proposes an update to the planning system to adapt to the risks of extreme climate events.

Hazard management tools such as overlays and existing policies need to be reviewed and applied appropriately. Some parts of Melbourne are located in high risk areas and there may be the need to actively retreat as hazards increase.



## **Options 48 and 49**

### **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.**

Plan Melbourne 2016 proposes the identification of risk areas and reduces their vulnerability to the risks of extreme climate events.

The planning system should always be informed by the latest data and evidence. Hobsons Bay is a coastal municipality and is affected by foreshore flooding and sea level rise, however the extent of flooding is still unknown as there has yet to be a third pass assessment of the bay. Areas of high risk should be identified and subject to limited growth or protected through planning mechanisms such as overlays. In extreme cases this could result in retreating from certain areas.

## **Option 50**

### **Incorporate natural hazard management criteria into Victorian planning schemes to improve planning in areas exposed to climate change and environmental risks.**

The Victorian Government acknowledges that integrated hazard management planning is essential to improving the capacity to respond to future risks. Plan Melbourne 2016 proposes to introduce a hazard management criteria and response hierarchy to deal with relevant hazards.

The inclusion of management criteria and subsequent planning controls would enable Council to better plan for, protect and manage the impacts of climate change. Any management options should be manageable and not be onerous or unreasonably burden Councils.

## **Option 51**

### **Investigate consideration of climate change risks in infrastructure planning in the land use planning system, including consideration of an 'infrastructure resilience test'.**

The Victorian Government has amended the *Emergency Management Act 2013* to help build resilience of critical infrastructure in Victoria and this is supported by the Critical Infrastructure Resilience Strategy. Plan Melbourne 2016 can support the strategy's implementation by encouraging consideration of climate change hazards.

Similarly to the above, this approach would enable Council to better plan for, protect and manage the impacts of climate change.



Climate change risks should not be limited to ‘shocks’ but consideration should also be given to prolonged exposure (such as higher than average temperatures). There could also be a reference to material selection and research required for development of more resistant options and support for business cases assessing whole of life costs of designs as opposed to a limited focused approach.

### **Option 52**

#### **Strengthen high-priority habitat corridors throughout Melbourne and its peri-urban areas to improve long-term health of key flora and fauna habitat.**

Urban development is causing the loss and endangerment of native species and this can be avoidable if biodiversity is considered when designing new suburbs. Council is an active member of Greening the West and supports this initiative.

### **Options 53 and 54**

#### **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.**

Council is supportive of the abovementioned strategies and suggests that tree canopy should mention both the private and public realms. Strengthened landscape requirements for developments would be welcomed. Another option for consideration could be the use of various materials that include reflective and light coloured surfaces to reduce the urban heat island effect.

### **Option 56A**

#### **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.**

The development of new and renewal of urban precincts provides an opportunity to reduce greenhouse gas emissions by encouraging low-emission and renewable energy use and ensuring the future urban structure supports local living and active transport over car travel.



## **Options 56B and 56C**

**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.**

The Precinct Structure Planning process determines the layout of roads, location of schools, open space and connections to other things. This process could be strengthened to more effectively identify opportunities or locations where the roll out of distributed generation would be cost effective.

Council is supportive of this approach however Council require the appropriate tools to undertake this would be required.

Council suggests that Option 56B be amended to read: 'strengthen the structure planning process to require future renewable and low emission energy generation technologies in Greenfield and urban renewal precincts.'

## **Option 57**

**Take an integrated approach to planning and building to strengthen Environmentally Sustainable Design (ESD), including consideration of costs and benefits.**

The planning system can encourage more energy-efficient buildings by orientating the building and internal layout in a way that maximises shade in summer and solar access in winter. The building system sets minimum standards for elements of a building to reduce energy consumption.

Consequently there is an overlap between the role that the planning and building systems play in ESD. The building regulatory system is generally not involved at the initial design stage of development where many of the key opportunities of incorporating ESD into buildings occur. The building system also only deals with the thermal energy rating of the building envelope and not the wider area of environmental sustainability. There is also currently a limited role that the planning system has in achieving ESD outcomes in new residential development. There is a need to integrate the planning and building approach to ESD and this should include water and energy security.



## **Chapter 7: New planning tools**

The Victorian Government is also evaluating a number of different planning tools to determine if there are opportunities to streamline the planning process and encourage more certainty.

### **Options 58A and 58B**

**Evaluate whether new or existing planning tools (zones and overlays) could be applied to National Employment Clusters and urban renewal areas.**

The right planning tools for the NECs and strategic redevelopment of urban renewal sites will depend on the area's size, location, history of use, urban context and the complexity of development to be facilitated.

The current suite of zones and overlays can support NECs and urban renewal areas however there may be the need to look at developing vertical zoning (where different levels within a building have different zonings) to better mandate a mix of uses in an area rather than the highest land use value.

### **Option 59**

**Comprises two options to evaluate the merits of code assessment for multi-unit development, taking into account the findings from the 'Better Apartments' process being:**

- **Option 59A Replace ResCode with a codified process for multi-unit development**
- **Option 59B Identify ResCode standards that can be codified. Do you have any comments on the merits of code assessment for multi-unit development**

The Victorian Government introduced VicSmart, a code assess planning permit application process to streamline minor buildings and works applications. There is a proposal to expand and adapt the process to cover multi unit developments.

Council supports a code assess approach in principle as it may reduce costs for Council (i.e. reduction in the number of VCAT hearings) however there is some concern in protecting neighbouring amenity, neighbourhood character and how such a process would work. Any codified process must be tangible and ensure there is limited impact detrimental to adjacent properties. Standards must not be ambiguous to ensure it is clear that a development proposal meets or does not meet the code. When assessing multi-unit developments, neighbourhood character is an important amenity element however it is unclear how such a consideration could be code assessed.



### **Other comments about Chapter 7 'New planning tools'**

Council suggests that the Victorian Government consider developing a range of new planning tools that provide a variety of land use outcomes.

These include:

- inclusionary zoning
- a hazard management overlay
- vertical zoning

Inclusionary Zoning could assist with the delivery of affordable housing. A Hazard Management Overlay could address planning in areas subject to hazards such as coastal climate change, major hazard facilities or pipelines. Vertical zoning may assist Councils in achieving a broader mix of uses in activity centres.



## **Chapter 8: Implementation**

This chapter reviews the implementation plan for Plan Melbourne 2014 and identifies opportunities for more effective implementation.

### **Options 60 and 62**

**Propose Plan Melbourne 2016 as being an enduring strategy with a long-term focus supported by a 'rolling' implementation plan.**

Plan Melbourne 2014 was developed as a long term, whole of government, implementation-focused land use and transport strategy containing 117 initiatives and 334 actions (284 short term, 44 medium term and six long term actions). A long term land use strategy with a separate implementation plan containing a shorter time frame could create a more enduring strategy. It is therefore supported by Council.

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

To make any implementation plan effective it must contain tangible goals that can be monitored and delivered. Any regular monitoring of the implementation should not largely impact on the direction of Plan Melbourne 2016 as others will be working towards these directions. In relation to the indication of local government's role in the implementation, a review of resources and potential changes in legislation (e.g. adoption of a state affordable housing framework) may be needed if local government is to be a key implementer. In addition, if local governments are required to report on their actions towards the plan, methods will need to be considered and accounted for within existing resources.

### **Other comments about Chapter 8 'Implementation'**

Plan Melbourne 2016 indicates that the Victorian Government would like to increase partnerships with Councils to support implementation however; the Victorian Government is proposing to introduce rate capping for Councils. Rate capping could impact on the ability of Councils to implement Plan Melbourne 2016 with many Councils needing to focus on the renewal of current assets and infrastructure and the provision of services. Councils will require resourcing to implement Plan Melbourne 2016 and support from the Victorian Government in the preparation and delivery of developer contribution plans would be welcomed.