COUNCIL REPORT

Committee
Planning, Development and Services Committee

Presenter
Cr Ng

Purpose

1. To seek Council approval to make the submission, attached to the Management Report, in response to Melbourne 2030, to the Department of Sustainability and Environment.

Recommendation

2. That Council:

   2.1. approve, subject to any necessary amendment, the submission attached to the Management Report, to the Department of Sustainability and Environment on Melbourne 2030 and the implementation plans; and

   2.2. by instrument of delegation sealed by the Council pursuant to Section 98 (1) of the Local Government Act 1958, delegate to the Manager Sustainable Policy & Planning, or the person from time to time acting in that position, the power to:

       2.2.1. make any necessary amendments to the submission;

       2.2.2. approve the final submission; and

       2.2.3. sign the submission on behalf of Council.
MELBOURNE 2030 – PLANNING FOR SUSTAINABLE GROWTH

Division   Sustainable Development & Strategy

Presenter  Mark Woodland, Manager Sustainable Policy and Planning

Purpose

The purpose of this report is to seek the approval of the Planning, Development and Services Committee to make the attached submission in response to Melbourne 2030, to the Department of Sustainability and Environment.

Time Frame

Submissions on Melbourne 2030 and the associated implementation plans are required to be submitted to the Department of Sustainability and Environment by the 14 February 2003.

Finance

Preparation of a response to the Metropolitan Strategy was included as an item in the Business Plan. Funds are available from the Department of Sustainability and Environment to assist Councils in the preparation of a response to the submission ($30,000) and in the implementation of Melbourne 2030 (up to $70,000 on agreement of a work program). A report regarding these funds was presented to Committee in November 2002.

Legal

There are no direct legal implications arising from the recommendation contained in this report.

Sustainability

Melbourne 2030 has been developed as a plan for the sustainable growth of Melbourne over the next thirty years. It contains policies and initiatives addressing economic, social and environmental matters.
Recommendation

That the Planning, Development and Services Committee recommend that Council:

- approve, subject to any necessary amendment, the submission to the Department of Sustainability and Environment on Melbourne 2030 and the implementation plans; and

- by instrument of delegation sealed by the Council pursuant to Section 98 (1) of the Act, delegate to the Manager Sustainable Policy and Planning, or person from time to time acting in that position the power to:
  
  - make any necessary amendments to the submission;
  
  - approve the final submission; and
  
  - sign the submission on behalf of Council.

Attachment:

1. Melbourne 2030 submission
The purpose of this report is to seek the approval of the Planning, Development and Services Committee to make the attached submission in response to Melbourne 2030, to the Department of Sustainability and Environment.

2. On 8 October 2002, the State Government released Melbourne 2030, a strategy that will guide metropolitan Melbourne’s growth and development over the next thirty years. The plan was released as a statement of government intent and was accompanied by five draft implementation plans covering housing, activity centres, green wedges, growth areas and the urban growth boundary. The State Government has recently released the sixth draft implementation plan on integrated transport. In addition the Government released a document entitled “Implementation in the Planning System” which contains guidance on the use of Melbourne 2030 and a draft provision for the State Planning Policy Framework of planning schemes to give statutory effect to Melbourne 2030.

3. A detailed report was presented to the Planning, Development and Services Committee in December 2002. The report provided specific reference to relevant issues, policy directions and initiatives of Melbourne 2030 and highlighted issues that would form the basis of Council’s submission. This report does not intend to repeat information provided in the report presented in December 2002 rather update Council on what has taken place since December 2002 and seek approval for the submission prepared in response to Melbourne 2030.

4. The vision for Melbourne 2030 is:

   “in the next thirty years, Melbourne will grow by up to one million people and will consolidate its reputation as one of the most liveable, attractive and prosperous areas in the world for residents, business and visitors”.

5. The strategy’s primary focus in on guiding and managing the change that will occur in metropolitan Melbourne over the next thirty years:

   “its clear focus is the management of future growth land use and infrastructure investment”.

6. Consequently Melbourne 2030 is primarily a land use strategy. Further, the strategy acknowledges that local government has a major responsibility for implementing Melbourne 2030.
7. Since December 2002 a number of actions have been undertaken to assist in the preparation of Council’s submission including:

7.1. Melbourne 2030 has been reviewed against key Council policies and strategies including City Plan 2010, the revised Municipal Strategic Statement (MSS), the Municipal Public Health Plan, the Social Housing Strategy, the Zero Emissions Strategy, and the draft Sustainable Water Strategy;

7.2. Council officers have met with representatives from other inner region municipalities to discuss the strategy and identify issues common issues and responses;

7.3. input from a broad cross section of officers within the organisation; and

7.4. Council officers have attended various workshops held by the Department of Sustainability and Environment and Municipal Association of Victoria.

Issues

8. Melbourne 2030 raises a number of significant issues for the City of Melbourne. In general Melbourne 2030 contains many policy directions and initiatives that will be positive for the long term development and growth of Melbourne.

9. While the document is largely consistent with the directions of City Plan 2010 and the revised Melbourne MSS there are a number of more detailed issues associated with the implementation of the directions of the strategy that require further consideration. The submission outlines the Council’s response to the draft implementation plans, the draft Clause 12 as well as other issues of importance included within the Melbourne 2030 document itself. In particular attention is given to activity centres and housing.

10. Council’s submission provides overall comments on the strategy, comments and recommendations for each of the relevant policy directions and identifies some gaps that are considered as being important for the strategy to address. A brief summary of the submission is outlined below.

Overall Comments

Sustainability

11. Melbourne 2030 contains many initiatives and directions that will help create a more sustainable city. One of the main principles of the strategy is sustainability and this is welcomed given Council’s goal of becoming a Thriving and Sustainable City. In a broad sense sustainability should be seen as being the overarching framework and driver of the strategy. Increasing the emphasis on sustainability by elevating it status and bringing it to the front of the document, rather than sitting within the Greener City chapter is considered essential, and is also reflective of the broader intent of sustainability embracing economic, social and environmental aspects.

Implementation

12. As Melbourne 2030 is primarily focussed on the management of urban growth the implementation plans primarily focus on urban planning matters. Many other elements and initiatives of the strategy are equally important in achieving the directions of Melbourne 2030 and whole of government implementation plans for state and other agencies should be prepared addressing these other actions.
Policy Directions

Policy Direction 1 - A more compact city

13. This policy direction articulates an overall direction of a more compact city as a means of managing and guiding metropolitan growth. Council’s earlier submission to the Challenge Melbourne Discussion Paper in December 2000 paper advocated a:

“spread of activity centres that provide for employment, shopping and recreational and community building activities throughout metropolitan Melbourne with open space and public transport linkages”.

14. The policy directions for a more compact city, including using activity centres as a focus for activity and broadening the land use base of centres that are dominated by shopping to provide for a greater diversity of services and employment opportunities is welcome.

15. The are however a number of issues particularly relevant to the City of Melbourne in this policy direction which are responded to in detail within the submission including:

15.1. a recommendation for greater recognition and definition of the function of activity centres within the City of Melbourne which include the Central Activities District and Lygon Street as a Major Activity Centre. It is considered that more direction is required with regard the boundaries and functions of these designated Activity Centres within Melbourne;

15.2. in particular with respect to Lygon Street, the submission recommends that the activity centre designation should apply to a broader area in South Carlton (to the south of Grattan Street), rather then be restricted to Lygon Street. The submission recommends that in designating this broader area as a Major Activity Centre clear direction regarding the need to enhance the education, research, institutional and business uses of this precinct whilst also allowing for some residential development that complements and does not jeopardise these other functions needs to be set. Recently adopted height controls for this area (through Amendment C20) have acknowledged the future role of this area and will enable a scale of development appropriate to its designation;

15.3. further, consideration is also requested for some areas in the City of Melbourne that have not been recognised in the strategy, specifically it is recommended that the Fisherman’s Bend area should be included as a Specialist Activity Centre and St Kilda Road should be recognised for its business function; and

15.4. the role of Mixed Use Areas outside designated activity centres as legitimate places for commercial activity is not adequately addressed in the strategy.

Policy Direction 2 - Better management of metropolitan growth

16. This policy direction details the adoption an urban growth boundary as a way of delineating the extent of outward expansion of metropolitan Melbourne, providing certainty for landowners at the urban/rural interface and in enabling better planning and co-ordination of urban development.

17. The submission highlights that whilst this policy is supported greater attention should be given to the need to plan for new development within existing established urban areas in terms of additional infrastructure that may be required to support a larger and potentially different community in terms of demographic characteristics. The extent of growth that is occurring within City of Melbourne also requires a planned and co-ordinated approach to provision of infrastructure. Assessment of the most recent development approvals data indicates that within the City of Melbourne (including the Docklands area) there are in excess of 24,500 dwellings that are either planned, approved, mooted or under construction, this alone would represent close to an additional 50,000 people within the municipality, which is almost the same as our existing population.
18. With increased densities in the inner region and less undeveloped space, new models for provision of facilities such as schools and other social and recreational infrastructure will be needed.

19. To manage a forecast growth of one million people (620,000 households) Melbourne 2030 splits Melbourne into 5 regions and apportions the forecast growth across each region. Specifically, 90,000 households are to be accommodated in the “Inner Melbourne” region, which comprises the municipalities of Melbourne, Port Phillip, Yarra and part of Stonnington (Prahran). This figure has been reviewed in conjunction with the City of Yarra and City of Port Phillip. Preliminary analysis of development approvals throughout the municipality and future development potential based on planning policy and controls (such as height and heritage overlays) indicates that the figure of 90,000 households for the inner region is considered to be achievable over a thirty year timeframe within the existing policy and planning scheme provision framework. More detail on this is provided in the submission, however this analysis reinforces the appropriateness of the existing planning scheme provisions to provide for the future growth anticipated in Melbourne 2030.

20. Overall in regard to this direction the submission calls for greater recognition of the need for planning of social and community infrastructure within established areas as well as new growth areas, and the greater use of social needs assessments as an input into activity centre plans.

Policy Direction 3 - Networks with regional cities

21. This policy direction addresses greater links with the regional cities and the role of the capital city in supporting regional cities, which Council would be supportive.

Policy Direction 4 - A more prosperous city

22. This policy direction focuses on strengthening capital city functions, enhancing Victoria’s position as the premier logistics centre, innovation and the knowledge economy. Council supports the policies contained within this direction, especially those relating to enhancing Central Melbourne’s Capital City function, enhancement of gateway infrastructure, positioning within the knowledge economy, enhanced broadband infrastructure and broadband access.

23. A key initiative of this direction is the development of a Central Melbourne Plan, which is supported and the submission recommends that work should commence straightaway on this plan as a partnership between the Council and State Government. The submission also recommends that City Plan 2010 should be used as a basis for the Central Melbourne Plan.

24. Key issues outlined in the submission include the need for better definition of the Central City area and of capital city functions so that there is consistency between Council and State Government definitions. The submission also recommends that greater emphasis be given to the need to revitalise the retail core.

Policy Direction 5 - A great place to be

25. This section provides policy direction addressing urban design, cultural identity, community safety and heritage. Council welcomes the policy directions outlined in this section specifically in relation to urban design principles, recognition of neighbourhood centres, protection of open space as essential policies to achieve a more inclusive and engaging city.

26. It is considered however that with greater densities and increased population in the inner region and associated with Melbourne’s recent and projected continued growth additional open space and high quality urban spaces will be required to meet the needs of the community.
Policy Direction 6 - A fairer city

27. This policy direction addresses issues such as affordable housing, community infrastructure, development sequencing and cultural facilities. Council broadly supports the policy directions outlined in this section as essential policies to achieve a more inclusive city.

28. In particular Council supports:

28.1. the need for increased and well located affordable housing;

28.2. the planning, co-ordination and provision of social infrastructure in a more equitable and timely manner; and

28.3. the development of a strong cultural environment and increasing access to arts, recreation and other cultural facilities.

29. The submission calls for a higher level of State Government commitment to the funding of social housing and an increased range of mechanisms that can be available to secure provision of affordable and social housing.

Policy Direction 7 - A greener city

30. This policy direction addresses issues such as water use, energy use, waste, greenhouse gas emissions and biodiversity.

31. The strategy contains initiatives for more sustainable use of water resources, which are also consistent with actions contained within its draft Sustainable Water Management Strategy. The submission recommends that greater links should be made between Melbourne 2030 and the State Government Water Resources Strategy in terms of targets and strategies for driving decreases in water use and improved efficiency.

32. The submission recommends that the initiatives relating to greenhouse gas emissions should be strengthened to do more than simply encourage the inclusion of energy efficiency standards for office buildings into the BCA. The introduction of five star energy ratings for commercial buildings, as well as other buildings, is essential.

Policy Direction 8 - Better transport links

33. This policy direction focuses on improvements to the principal public transport network, planning urban development to make jobs and community services more accessible, integration of the public transport system, management of the road system to make the most of existing infrastructure and giving more priority to cycling and walking. The strategy acknowledges that the road system will remain the key element of the regions transport system.

34. The draft transport implementation plan details a list of actions, the majority of which are to conduct or complete specific plans or strategies such as the Bus Plan, Tram Plan, Train Plan, and various area strategies such as the inner west strategy. The implementation plan in itself does not paint a clear picture of the transport initiatives that will occur or be required across Melbourne. In short the strategy and implementation plan provide insufficient detail of the transport initiatives required to support the population and economic growth anticipated under Melbourne 2030.

35. The policies and initiatives relating to transport are fairly general in nature and require further consideration. The submission highlights that the implementation plan does not go far enough in identifying and supporting known improvements to the transport network and highlighting areas where significant improvements are required and recommends that a revised plan be released following completion of some of these key studies.
36. The submission also recommends that greater emphasis should be given to the need to ensure that the metropolitan transport network maximises access to the Central City given its capital city functions and metropolitan significance as a major attractor.

**Gaps**

37. Aside from issues listed above the main gap identified of Melbourne 2030 is the lack of any ongoing and future monitoring. It is considered that the strategy should contain a monitoring framework that will track changes over time associated with the implementation of the Strategy. Ideally the monitoring framework could provide a consistent basis for Council’s to use in the monitoring sections of their MSS’s enabling a picture to be built up of growth and development in Melbourne.

**City Plan 2010 / Municipal Strategic Statement**

38. At a policy objectives level there is a high degree of consistency between Melbourne 2030 and both City Plan 2010 and the revised Melbourne MSS.

**Relation to Council Policy**

39. Melbourne 2030 is a high level strategy and at an objective/policy level there is a high degree of consistency between various Council policies including the Municipal Public Health Plan, the Social Housing Strategy, the Zero Emissions Strategy, draft Sustainable Water Strategy and City Plan 2010.

**Consultation**

40. The submission is part of the consultation period on Melbourne 2030 and the draft implementation plans. The State Government has held public information sessions in the Town Hall, as well as others throughout the metropolitan area. There has also been an extensive promotional campaign in local papers to increase awareness of Melbourne 2030.

**Government Relations**

41. The State Government sees implementation of Melbourne 2030 as a partnership, with local government being a significant player in the implementation of the directions of the strategy. The implementation plans contain actions (future work items) many of which will need to occur over the next few years and will lead to a number of additional items on the work program. In addition to the $30,000 available to Council to assist in preparation of a submission to Melbourne 2030, $70,000 will be made available to Council later in 2003 following receipt of a submission from the Council and to contribute to future work that will be needed flowing from the strategy. A work program will need to be agreed with the Department of Sustainability and Environment regarding expenditure of these funds.
Recommendation

42. That the Planning, Development and Services Committee recommend that Council:

42.1. approve, subject to any necessary amendment, the submission to the Department of Sustainability and Environment on Melbourne 2030 and the implementation plans; and

42.2. by instrument of delegation sealed by the Council pursuant to Section 98 (1) of the Act, delegate to the Manager Sustainable Policy and Planning, or person from time to time acting in that position the power to:

42.2.1. make any necessary amendments to the submission;

42.2.2. approve the final submission; and

42.2.3. sign the submission on behalf of Council.
Submission to Melbourne 2030

Melbourne City Council

February 2003

DRAFT
1. Introduction

Melbourne City Council welcomes the release of *Melbourne 2030 – Planning for Sustainable Growth* and its associated implementation plans as a necessary framework to guide and coordinate the future development of Melbourne and its immediate surrounds. The plans are considered to contain many positive elements and initiatives. Councils’ own policies and objectives are substantially consistent with Melbourne 2030 regarding the future role of the City of Melbourne as the capital city of Victoria.

This submission outlines the Council’s response to the draft implementation plans, the draft Clause 12 as well as other issues of importance included within the Melbourne 2030 document itself. In particular attention will be given to the City of Melbourne’s capital city role, activity centres, housing and transport. This submission also provides feedback regarding the implementation plans and recommends new initiatives or changes that would assist in its effective implementation.

2. Vision for City of Melbourne

City Plan 2010 is Melbourne City Council’s primary planning strategy. It sets out what Council believes must happen over the next ten years to achieve the vision for Melbourne. The vision of City Plan 2010 is for Melbourne to be a Thriving and Sustainable City. Council has adopted a set of strategic directions to realise this vision. These directions are organised around four themes addressing the following issues:

**Connected and Accessible City**
- World competitive gateway transport infrastructure
- ICT infrastructure
- Alliances and networks
- Corporate citizeenships
- Sustainable and integrated transport systems
- Increased public transport usage and service quality
- Integrated and connected parks system
- Enhanced connections between Docklands, Central City and the Yarra

**Innovative and Business City**
- Knowledge City
- Innovative business culture
- Principal centre for commerce, professional, business and financial services
- World class retail core
- Small and medium businesses
- Advanced Manufacturing and logistics clusters

**Inclusive and Engaging City**
- Participation in City life
- Provision of services and facilities to residents, visitors and workers
- Melbourne as a city for the arts and a sporting capital
- Increasing the City’s residential population
- Protecting Melbourne’s distinctive physical character and developing a strong sense of place and identity
- Creating an exemplary urban environment and enhancing the quality of the built form
- Developing the Yarra River corridor as the City’s primary recreational and leisure feature
• Increased tourism
• Attracting and facilitating events and festivals

*Environmentally Responsible City*
• Reducing greenhouse gas emissions
• Encourage efficient resource use and waste reduction
• Protecting and enhancing the City’s biodiversity
• Environmental leadership
• Creation of a sustainable built form

3. Overall Comments

Overall at the strategic level there is a high degree of consistency between the directions of Melbourne 2030 and the directions of City Plan 2010 and many other Council strategies.

*Sustainability*

Melbourne 2030 contains many initiatives and directions that will help create a more sustainable city. One of the main principles of the strategy is sustainability, and this is welcomed by the City of Melbourne which is committed to creating a Thriving and Sustainable City. In a broad sense sustainability should be seen as being the overarching framework and driver of the strategy. The opportunity exists to be more explicit in terms of the connections between initiatives and how they contribute to Melbourne becoming more sustainable – this will help increase awareness of sustainability and make the link between actions and the goal more explicit.

Increasing the emphasis on sustainability by elevating its status and bringing it to the front of the document, rather than sitting within the Greener City chapter is considered essential, and is also reflective of the broader intent of sustainability embracing economic, social and environmental aspects. The recently released draft Western Australian State Sustainability Strategy is considered to be a good example of how sustainability can be used as a framework for driving action and real outcomes on the ground.

*Capital City*

As the capital city, the City of Melbourne contains and is distinguished from other centres throughout the metropolitan area by the mix of uses located within it, their role and relationships at a metropolitan, national and international level, as well as high visitation levels. More than half a million people come to the City of Melbourne each day for work, business, shopping, education and leisure, making it the key attractor within Melbourne.

The City of Melbourne believes that an attractive, vibrant, accessible and sustainable capital city is important to the whole metropolitan area and the State.

It is considered that Melbourne 2030, the draft Activity Centre Implementation Plan and draft Clause 12 do not provide a clear direction regarding the relationship between the Central Activities District and other activity centres throughout Melbourne and how this may be realised through the nature and scale of developments approved within each centre. The Council believes that planning for all activity centres should complement the specialist nature of the Central Activities District and its capital city functions. It is therefore recommended that greater guidance on the relationship between the CAD and other centres be given prior to the commencement of detailed structure planning and that this be reflected in Melbourne 2030 and the proposed Clause 12.
Melbourne 2030 Implementation

Clause 12

The draft Clause 12 is considered to be a comprehensive reflection of the directions of the Strategy. Some comments are provided through the main body of the submission and more detailed comments on Clause 12 can be found in Attachment One.

Implementation Plans

As Melbourne 2030 is primarily focussed on the management of urban growth the implementation plans released to date primarily focus on planning matters (with the exception of the draft Transport Implementation Plan). The other elements and initiatives of the strategy are considered equally important in achieving the sustainable development and growth of Melbourne and greater links should be made between the non planning actions via implementation plans for state agencies. As the strategy is a statement of government intent and there is no funding commitment to all initiatives it is unclear what the priority actions for the State Government will be.

As a result it is recommended that more implementation/action plans be prepared, providing an indication of what government action will be on implementation of the Melbourne 2030 initiatives over the next five years and highlighting opportunities for partnerships with local government and other groups. As a long term strategy it is important that the implementation framework provide for detailed action plans to be developed every five years.

In recognition of the importance of the capital city the Central Melbourne Plan, should contain a list of actions and implementation strategies, similar to other implementation plans that form part of Melbourne 2030. It is recommended that work commence straight away as a partnership between the State Government and City of Melbourne to develop this plan, using City Plan 2010 as its basis.

There are a range of actions listed in the Housing and Activity Centre Implementation Plans that call for a review of existing policies, strategies and plans that may have been developed. Many Councils have prepared local area plans, structure plans and housing strategies and there is a need for acknowledgment of current strategic planning work that may have occurred. Some kind of auditing/review of existing policies, plans and strategies for consistency with Melbourne 2030 directions is recommended as a first step.

There is also a clear need to ensure that time is allowed for the detailed strategic planning envisaged in Melbourne 2030 to be completed before any approval of major development which might potentially undermine/compromise the outcomes of such work.

Development Guidance

The opportunity exists to adopt a “precautionary principle” approach to consideration of proposals so that developments which are considered by the Responsible Authority, to be consistent with or would be premature prior to more detailed work occurring, would not be approved prior to the structure plans and relevant guidelines being in place.

For instance Council has already experienced applicants using the housing directions and population forecasts as a means to support development that may be inconsistent with planning scheme provisions such as height controls. As it will take some time to complete housing strategies and activity centre structure plans (which are short and medium term actions) it is anticipated that there will be ongoing and considerable pressure from developers to approve large residential developments in order to meet the population forecasts. This is of
concern and it is considered that greater guidance is needed from the Department to the development sector regarding the way in which the draft Clause 12 and Melbourne 2030 are to be used in the consideration of planning proposals.

Monitoring

It is considered that the strategy should contain a monitoring framework that will track changes over time associated with the implementation of the Strategy. Ideally the monitoring framework could provide a consistent basis for Council’s to use in the monitoring sections of their MSS’s enabling a picture to be built up of growth and development in Melbourne.

**Recommendations:**

- That additional whole of government implementation plans and five year action plans be prepared addressing the full suite of Melbourne 2030 initiatives and actions.
- That a whole of government five year capital city action plan based on City Plan 2010 be included within the suite of Melbourne 2030 implementation plans.
- Greater guidance on the relationship between the CAD and other centres be given prior to the commencement of detailed structure planning for activity centres and that this be reflected in Melbourne 2030, the draft Activity centre Implementation Plan and the proposed Clause 12.
- Guidelines should be developed, adopting a “precautionary principle” approach to development around activity centres and other areas to ensure that major developments that raise major strategic planning issues do not proceed prior to the completion of any relevant structure plans, housing strategies or other studies are completed.
- An initial action for Councils should be to audit/benchmark existing strategies, plans and policies against Melbourne 2030 directions prior to identifying the need to do any additional work.
- That a monitoring framework for Melbourne 2030 be developed.

4. Policy Direction 1 – A more compact city

*Comment*

The overall direction of a more compact city as a means of managing and guiding metropolitan growth is supported. Councils earlier submission to the Challenge Melbourne paper advocated a “spread of activity centres that provide for employment, shopping and recreational and community building activities throughout metropolitan Melbourne with open space and public transport linkages”¹. Council therefore welcomes the policy directions for a more compact city, including using activity centres as a focus for activity and broadening the land use base of centres that are dominated by shopping to provide for a greater diversity of services and employment opportunities.

Designation of Activity Centres

Central Activities District

Council welcomes the reconfirmation and designation of the Central Activities District as metropolitan Melbourne’s largest centre of activity with the greatest diversity of uses and functions and most intense concentration of development. The strategic role of the Central City as identified in Council’s revised draft MSS is “for the Central City to be the primary place of business finance entertainment, cultural activities and retail in Victoria and a place that can facilitate the growth of innovative business activity. A 24 hour city attracting visitors from a wide catchment and providing for high-density inner city residential development that complements but does not detract from its other primary functions”. The strategic framework plan included in the revised MSS indicates that for the central city area our overall direction is to strengthen and enhance the capital city role of the City of Melbourne, and strengthen it as the primary place for business and commerce.

More comments regarding the CAD are provided in discussion of Policy Direction 4, however the Council supports the primary functions of the Central City being its business, cultural, retail and entertainment functions. The role of housing within the Central City should be seen as secondary to and complementary to these other activities. The role of the CAD as a location for significant further housing growth is unclear in the strategy and requires further discussion. City of Melbourne is already experiencing evidence of the tension between the CAD entertainment function and housing growth. The capacity of the CAD to accommodate significant further growth of housing should be tempered by the desire to promote its entertainment, tourism and leisure roles.

Major Activity Centres

There is confusion in the strategy regarding the status/designation of the South Carlton (south of Grattan Street) area. It is unclear whether the area south of Grattan Street (and the universities to the north) is included within the Knowledge Precinct and is therefore part of the Central Activities District; or whether it is part of the Parkville Specialist Activity Centre (using the definition in the State Government Biotechnology Strategy); or whether it is intended to be part of the Lygon Street Major Activity Centre. Definition of the Knowledge Precinct is required.

The St Kilda Road area, which is a major business and residential precinct, located on the principal public transport network is not identified in the activity centre network. While the central city office market is changing with the development of Docklands and the unique opportunities it offers, the Council believes that St Kilda Road will continue to play a significant business role and that it deserves greater recognition in Melbourne 2030.

Lygon Street as a major activity centre

Council adopted Carlton 2010 in 2001 as an integrated local area plan for Carlton. This plan is used as the primary land use strategy for Carlton and has influenced land use policy in the revised MSS and local policies. The aim for the Lygon Street precinct is “to promote the Lygon Street area as a mixed use commercial and residential area while protecting the 19th century streetscape”. Carlton 2010 indicates that with respect to land use and built form the area can “accommodate only minimal change” and that “there is scope for extensions and limited infill development of non-heritage sites and a small number of significant development opportunities”. Carlton 2010 also acknowledges the dual role of Lygon Street as a regional

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2 Carlton 2010 – Integrated Local Area Plan, 2001
and national tourist destination and providing an important local service function, especially
the area north of Grattan Street.

A large part of the Lygon Street area is covered by heritage controls limiting the extent of
development that is able to occur. The recently approved Amendment C20 introduced built
form controls to parts of the municipality equivalent to a 3 storey mandatory height control to
the north of Grattan Street and a 4 storey discretionary height control south of Grattan Street.

To the north of Grattan Street Council’s policies emphasise the need to enhance the provision
of local services on Lygon Street – the revised draft MSS has an objective to “manage the
local role played by the Lygon and Elgin Street areas north of Grattan Street and the regional
retail and tourism role south of Grattan Street”.

In the South Carlton precinct Carlton 2010 has an aim to “develop the South Carlton area as
a mixed use education, research and development area with a dynamic new built form and a
high quality public environment.” The plan acknowledges the area can accommodate
substantial change and that the “focus is on the growth and expansion of institutional and
associated activities which are of regional and national significance”\(^3\). Residential
development, along with educational uses is encouraged along Swanston Street. Height
controls that would enable 9 storey development along Swanston Street and 8 storey
development in the South Carlton precinct are in place.

These directions have been reflected in the revised draft MSS, which also includes a provision
for monitoring the level of residential development in the South Carlton area to ensure that
the amount of residential development in the area does not affect its primary function for
education, research and development.

While there may be housing growth within South Carlton, Council has concerns that
substantial growth may affect the other functions of the area and conflict with its heritage and
built form controls. The broader South Carlton area with its universities, hospitals, business,
entertainment and retail opportunities along Lygon Street and potential for housing growth
may be considered a major activity centre in a broader sense, however the role of the activity
centre is to maintain this broader mix of functions and not be jeopardised by increased
housing. Lygon Street of itself is not considered to be a major activity centre.

While certain parts of Carlton are on the principal public transport network, such as Swanston
Street, there is a need to enhance public transport in this area. Carlton 2010 has an aim to
increase public transport use and improved public transport services and amenities in Carlton.
It contains an initiative regarding the need to investigate the improvement of public transport
infrastructure to Carlton, “including the feasibility of the extension of the underground rail
loop to Carlton and improved east west links”\(^4\).

It is therefore recommended that the strategy highlight South Carlton (south of Grattan Street)
as a major activity centre rather then Lygon Street. In designating this area as a Major
Activity Centre clear direction needs to be set regarding the need to enhance the education,
research and institutional uses of this precinct, encouraging businesses that support these
major uses, and allowing for some residential development that complements and does not
jeopardise these other functions. Carlton 2010 and Amendment C20 provide a broad but very
sound land use and development framework for this area.

\(^3\) Carlton 2010, P 39
Specialist Activity Centres

Council supports designation of specialist activity centres throughout Melbourne in recognition of the role that these uses and facilities play. Councils own strategy and policy documents such as City Plan 2010, the revised draft MSS, Port Melbourne Structure Plan, Knowledge City Strategy and others recognise the important roles of the Parkville Biomedical Precinct, the Alfred Medical Precinct, the Knowledge precinct in South Carlton and the Port Melbourne/Fishermans Bend advanced manufacturing and research and development precinct.

Of these four precincts only two are recognised in Melbourne 2030 as Specialised Activity Centres. Council believes that the Fisherman’s Bend area which is recognised in the State Government Innovation Strategy as an emerging aerospace and automotive cluster should be treated as a Specialised Activity Centre. The area contains a tertiary education and research facility (RMIT Aerospace) and many large organisations. The Port Melbourne Structure Plan (2000) indicates a potential employment base of 20,000 people by 2020. The benefits of recognising Fisherman’s Bend/Port Melbourne as a specialist activity centre revolve around the clustering effects and the attraction of like business to the area, as well as promotion of the precinct as a whole. Council believes that the area should be designated as a Specialist Activity Centre in light of its future employment potential and its role.

The Innovation Strategy also lists the Docklands as a new media, games, digital design, film and TV cluster and greater recognition of this should occur in the strategy.

The Parkville Medical and Bioscience Precinct as defined in the State Biotechnology Strategy is primarily centred on Parkville but also includes groups within a 3 kilometre radius of Parkville including the City, Carlton, Fitzroy, and East Melbourne. Within Parkville itself biomedical research and development uses are found in different locations including the Bio 21 precinct on Flemington Road, the Monash Pharmacy College on Royal Parade and the CSL site to the north of Royal Park. As such it is not a discrete precinct found on a particular site but rather a series of uses located/clustered in close proximity to each other. With this pattern it is difficult to see how some of the directions of Melbourne 2030 regarding complementary uses are relevant to this centre and require further consideration.

Greater definition is needed in the strategy, or associated implementation mechanisms (such as Clause 12) on the geographic definition of the Parkville area. Some of the performance criteria for activity centres such as listed on Page 53 of Melbourne 2030 are not applicable to Specialist Activity Centres.

Treatment of Mixed Use Areas

Within the City of Melbourne there are many areas in Carlton, North and West Melbourne and Southbank that are within the Mixed Use Zone. These areas have accommodated a mix of commercial and other uses since the original settlement of these suburbs. Council’s objectives for each of these areas varies however in a broad sense are supportive of the retention of existing businesses and the establishment of new businesses within them. For example the area immediately adjacent to the Central City, south of Dudley Street and west of Flagstaff Gardens has been identified in the revised draft MSS as an area that will contain businesses that will support the Central City and Docklands areas. The same is true for other areas in the City of Melbourne such as St Kilda Road and East Melbourne that are within business zones. Other inner city municipalities have a similar pattern of land use and objectives concerning land use mix.

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5 Victorian Government Innovation Statement October 2002
Melbourne 2030 does not provide direction on the role of these areas. Using the network of activity centres within the City of Melbourne, only Lygon Street has been identified as a major activity centre. The draft Clause 12 actively discourages uses, particularly commercial uses, outside of activity centres, stating “ensure that proposals or expansion of activities outside activity centres are discouraged”. Interpretation of this policy could mean that in parts of North and West Melbourne where there are substantial areas of land within the mixed use zone, which has an objective to “provide for a range of residential, commercial, industrial and other uses that complement the mixed use function of the locality”, businesses would be discouraged. Given Council’s objectives for the area it is inappropriate to treat commercial uses as “out of centre” and to apply the proposed out of centre guidelines to proposals in this area.

The approach adopted in Melbourne 2030 for activity centres is more relevant to areas where there is a discrete business/retail area such as a stand-alone centre or small strip centre surrounded by residential development. In areas where there is a more extensive and diverse mix of land uses, the objectives and policy directions of the Strategy should be amended.

Regional Housing Forecasts

Over a 10 year period the inner region housing forecast equates to an additional 34,000 households. Analysis of recent development approvals in the City of Melbourne indicates that approximately 24,500 dwellings are in the planning permit, construction, completion or mooted phases. Taking into account the Docklands (8,000), Yarra, Port Phillip and part of Stonnington, the amount of development approved is roughly equivalent to this 10 year forecast. While all development may not occur within the ten year period, it is clear that the level of development activity approvals is able to provide for the forecast short term growth.

Preliminary analysis of development approvals throughout the municipality and future development potential based on planning policy and controls (such and height and heritage overlays) indicates that the figure of 90,000 households for the inner region is considered to be achievable over a thirty year timeframe within the existing policy and planning scheme provision framework. This analysis reinforces the appropriateness of the existing planning scheme provisions to provide for the future growth anticipated in Melbourne 2030.

Given this, and the actions listed in the draft Housing and Activity Centre Implementation Plans requiring preparation of local housing strategies, and activity centre structure plans which are short and medium term actions the importance of applying a precautionary principle approach to development and is reinforced.

Implementation mechanisms

Council supports Initiative 1.1.5 to review existing business zones with a view to creating specific zones to implement the activity centre policy. The need for a second Mixed Use Zone within the Victorian Planning Provisions has been highlighted several times in Panel Reports and by Council most recently in the MSS Three Year Review Report in December 2001 and the C20 panel in November 2001. The C20 Panel report recommended that:

“DOI should review the way in which the Mixed Use Zone is operating, any problems associated with it, and whether it should remain within the suite of residential zones in the VPPs or be included in a category of its own”. 
The MSS Three Year review Report recommended that the DOI:

“review the Mixed Use Zone to determine the appropriateness of dwellings remaining a section 1 use and the type of level and guidance provided for decision making in respect to interface and amenity issues”.

Many inner city Councils are also experiencing this same issue and investigating ways to manage and achieve a true desired mix. Such a zone would contain stronger objectives regarding land use mix and would include residential uses as a discretionary use requiring a planning permit. In October 2002 Council resolved to enter into discussions with other inner city councils in relation to the preparation of a joint submission to the Minister for Planning requesting the introduction of a new mixed use zone within the Victorian Planning Provisions.

Council also welcomes Initiative 1.2.4 to further develop and improve the Melbourne Cricket Ground/Sports and Entertainment precinct as the major sporting precinct for Melbourne and ensure that other major sporting facilities are well located for public transport. City Plan 2010 has an objective to support and enhance the major sports and entertainment facilities, and associated transport facilities in recognition of their national significance, and to support enhanced links with the precinct and the Central City and Richmond Station. In enhancing the Sports and Entertainment Precinct attention also needs to be given to the protection of the parkland values of Yarra Park including the reduction of vehicle access and car parking on grassed areas as new opportunities arise.

Clause 12

In relation to the Central Activities District (Policy 1.1) the proposed Clause 12 does not contain reference to the entertainment, cultural and sporting facilities in the Central Activities District whereas Melbourne 2030 (p80) as does the current SPPF has this as a direction. Clause 12 should therefore be amended to reflect this.

In relation to Major Activity Centres reference is made to “a potential to grow and support intensive housing development without conflicting with surrounding land uses”. One of the difficulties experienced by the City of Melbourne recently has been an increasing tension between residential and non-residential uses within mixed-use areas and the central city (Capital City Zone) itself. The existing mixed use zone and potentially capital city zone provisions are considered to be inadequate to ensure this occurs. The approach adopted most recently by the City of Melbourne in its revised draft MSS has been to indicate the nature of uses that will occur within an area and then indicate that residential development will occur within that context.

The definition of “higher density housing” included in Melbourne 2030 does not provide guidance to Councils nor assistance in implementing the strategy – if an area has an average density of 10 dwellings/ Ha then higher density could mean 11 dwellings /ha – this does not necessarily achieve the outcomes of the strategy, nor is there much guidance in the proposed Clause 12 to assist in determining whether that figure is appropriate.

Within Policy 1.2 – the implementation strategy of “ensuring that proposals or expansion of activities outside activity centres are discouraged”, will create difficulties for establishment of businesses in the mixed use and business areas in North and West Melbourne, Southbank, St Kilda Rd, Carlton and East Melbourne and should be amended.
**Recommendations:**

- Greater definition/clarification is needed in the strategy and associated implementation mechanisms (such as Clause 12) on the geographic extent of the Parkville Specialist Activity Centre.
- Greater recognition needs to be given to the existing areas that are located within the mixed use or business zones and the content of Clause 12 amended to not conflict with the objectives of those zones.
- That Fisherman’s Bend be designated as a Specialist Activity Centre.
- That St Kilda Road be identified as continuing to play an important role as a premier commercial and residential area.
- That Council and the State Government jointly revise the definition of the Central Activities District/Central City to ensure consistency.
- That the appropriateness of designating Lygon Street per se as a Major Activity Centre be reviewed in light of the broader land use objectives for the South Carlton area.
- In existing urban areas where there is an established, extensive and diverse mix of land uses, the strategy should be amended to provide a positive framework for business uses to occur.
- Definition of the Knowledge Precinct is required and a clear statement be provided as to what activity centre it is part of.
- An additional initiative/action should be added regarding implementation of a new Mixed Use Zone - such a zone would contain stronger objectives regarding land use mix and would include residential uses as a discretionary use requiring a planning permit.
- Recognition of the parkland values of Yarra Park and the need to reduce car parking on grassed/open space areas should be given in the development of the Sports and Entertainment Precinct.

**5. Policy Direction 2 - Better Management of Metropolitan growth**

**Comment**

The Council supports the adoption of an urban growth boundary as a way of delineating the extent of outward expansion of metropolitan Melbourne, providing certainty for landowners at the urban/rural interface and in enabling better planning and co-ordination of urban development. Council also supports the designation of green wedges and the articulation of features and values for each green wedge.

Policy 2.3 discusses the better management and sequencing of development in growth areas so that services are provided when required by communities. This policy is supported, however greater attention should be given to the need to plan for new development within existing areas in terms of additional infrastructure that may be required to support a larger and
potentially different community in terms of demographic characteristics. Recognition of this shift in population growth in established areas is important for the strategy given that approximately 70% of population growth will occur within established areas.

The extent of growth that is occurring within City of Melbourne also requires a planned and co-ordinated approach to provision of infrastructure. The City of Melbourne has been experiencing rapid population growth. In the year to 2001, the City of Melbourne population grew by 10%, the fastest growth of any local government in Australia. Whilst it may not be the greatest in terms of additional people, in the 5 years to 2001 City of Melbourne growth of 12,401 additional residents is comparable with some other Councils including some in the growth areas such as Brimbank – 14,255, Knox – 11,029, Melton - 12,583, Whittlesea – 12,080, and Wyndham – 11,402. The amount of known mooted, planned and dwellings under construction in City of Melbourne (24,500 dwellings) represents close to a doubling of the current population.

An example of the nature of this change is Southbank where substantial residential growth has occurred in an area that was not previously used for residential purposes – in 1996 the population was 2239 people, in 2001 the population was 4399 people, representing a doubling of the population in 5 years. To address this essentially new residential community Council has recently commenced a social needs audit which will identify social needs within the area.

With increased densities in the inner region and less undeveloped space, new models for provision of facilities such as schools and other social and recreational infrastructure are needed. The Central City, Southbank and Docklands will contain substantial residential populations requiring greater consideration of how to support this population and manage reasonable amenity expectations given the role of these areas. Managing a much more intensive type of development is a challenge for all. It is recommended that an additional initiative/task be added to the Strategy and implementation to investigate construction methods and develop standards to ensure that residential dwellings that are being constructed in activity centres, the central city and other mixed use areas are designed and constructed in a way that is suitable for a high density mixed use area.

**Recommendations:**

- **In recognition of the shift of housing growth to established areas, a new initiative should be added to Melbourne 2030 to require a detailed growth framework for inner urban areas that are undergoing substantial growth**

- **Social Needs Assessments should be a fundamental component of structure planning for activity centres and an integral part of regional and local housing strategies.**

- **An additional initiative/task be added to the Strategy and implementation to investigate construction methods and develop standards to ensure that residential dwellings that are being constructed in activity centres, the central city and other mixed use areas are designed and constructed in a way that is suitable for a high density mixed use area.**

### 6. Policy Direction 3 – Networks with the regional cities

Council is supportive of greater links with the regional cities and the role of the capital city in supporting regional cities.

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7 Source: Australian Bureau of Statistics
7. Policy Direction 4 – A more prosperous city

Council supports the policies contained within this direction, especially those relating to enhancing Central Melbourne’s capital city function, enhancement of gateway infrastructure, positioning within the knowledge economy, enhanced broadband infrastructure and broadband access.

Capital City Role and Central Melbourne

City Plan 2010 and the revised Melbourne MSS both support the development of the City of Melbourne as the capital city. Strengthening and enhancing Melbourne’s capital city role is a priority of the revised MSS, which states:

“Strengthening and enhancing the capital city role of the City of Melbourne is a priority of the Council and supported by the State Planning Policy Framework. Melbourne’s capital city role includes:

• Government & corporate centre—decision making functions such as seat of government, corporate, non-government and regional headquarters.
• Intellectual centre—nurturing intellectual capacity and innovation, through clustering of education, medical and research institutions and arts activity.
• Centre for the State’s primary civic facilities—Museum, Art Gallery, State Theatre, State Library.
• Trade gateway—providing national and international links through services and facilities such as Exhibition and Convention Centres, brokering relationships and providing services for the region and international markets, including through a civic host role.
• Centre for entertainment, arts, leisure and sport—theatres, cinemas, concert venues, restaurants, aquarium, and key sporting facilities such as the Melbourne Cricket Ground, Tennis Centre, Docklands Stadium, and major metropolitan parks and gardens.
• Major Victorian focus in retail activity,
• Tourism and visitor gateway and home of major international events and festivals.
• Transport hub—for people and freight movement, locally, regionally and internationally.
• Primary place of employment in the State and the primary location for higher order business activities in Victoria, containing national and international company headquarters, primarily in the Central City but also in Docklands and St Kilda Road.
• Provision of higher order/specialist services eg health services and hospitals”.

The approach adopted in the revised Melbourne MSS is to map the capital city functions and to indicate those parts of the municipality that are not considered to serve a capital city function as such. This will ensure that when development applications are considered a clear direction is provided on the role of these areas with respect to capital city functions. This can then be used as an important input into the Central Melbourne Plan. It is recommended that capital city functions/role be defined using the definition listed above and mapped in the strategy.

Melbourne 2030 uses several terms to describe the central city area, including Central Melbourne, Central Activities District, Central Business District and Capital City Functions. The definitions used in Melbourne 2030 differ slightly from those used by Council in City Plan 2010 and the revised Melbourne MSS, and it is recommended that the number of definitions can be streamlined. It would also be preferable for the definition of the CAD / Central City to be consistent.

The City of Melbourne submission to the Challenge Melbourne paper recommended the “development of a new Capital City Policy in partnership with the City of Melbourne which
reinforces the role of the capital city”. Council therefore welcomes Initiative 4.2.1 and actions listed in the Activity Centre Implementation Plan (to review existing central city policies and develop an action plan) and looks forward to working with the State Government and other key stakeholders on this plan. Council believes that the Central Melbourne Plan should focus on enhancement of capital city functions. The recently developed City Plan 2010 in conjunction with Melbourne 2030 provides a basis for the development of the Central Melbourne Plan.

Using the definition of capital city functions outlined above it is clear that the majority of these functions occur within the City of Melbourne. Based on this it is believed that development of the plan should occur primarily as a partnership between the State Government and the City of Melbourne.

With current rates of planning and building approvals the Central City is set to become the municipalities primary residential precinct (refer Table 1). As stated previously direction on the role of housing in Central Melbourne/CAD is unclear. The revised MSS and City Plan 2010 are clear in indicating that housing is secondary to its other functions and that the level of residential amenity in the Central City is commensurate with its 24 hour function. This should be emphasised in the Strategy and Clause 12.

<table>
<thead>
<tr>
<th></th>
<th>Existing Dwellings</th>
<th>Proposed Dwellings</th>
<th>Total Dwellings</th>
</tr>
</thead>
<tbody>
<tr>
<td>CBD</td>
<td>5440</td>
<td>7233</td>
<td>12673</td>
</tr>
<tr>
<td>Docklands</td>
<td>75</td>
<td>7925</td>
<td>8000</td>
</tr>
<tr>
<td>Southbank</td>
<td>2548</td>
<td>6723</td>
<td>9271</td>
</tr>
<tr>
<td>St Kilda Rd/Sth Yarra/Melbourne remainder</td>
<td>3152</td>
<td>520</td>
<td>3672</td>
</tr>
<tr>
<td>East Melbourne &amp; Jolimont</td>
<td>2163</td>
<td>909</td>
<td>3072</td>
</tr>
<tr>
<td>Carlton</td>
<td>5087</td>
<td>3497</td>
<td>8584</td>
</tr>
<tr>
<td>North Melbourne</td>
<td>3464</td>
<td>1022</td>
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</tr>
<tr>
<td>West Melbourne</td>
<td>1007</td>
<td>697</td>
<td>1704</td>
</tr>
<tr>
<td>Parkville</td>
<td>1705</td>
<td>1171</td>
<td>2876</td>
</tr>
<tr>
<td>Kensington</td>
<td>2295</td>
<td>1367</td>
<td>3662</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>26936</strong></td>
<td><strong>31064</strong></td>
<td><strong>58000</strong></td>
</tr>
</tbody>
</table>

Initiatives 4.2.2, 4.2.3 and 4.2.4 are also supported. The need for improved tram links to Fisherman’s Bend is highlighted in both City Plan 2010 and the revised draft MSS, as is the need to improve public transport to Southbank and Docklands.

Retail Core

Council has recently developed a Retail Core Revitalisation Strategy, a major element of which is the redevelopment of the Bourke Street Mall. In December 2002 the Premier wrote to Council indicating that revitalisation of the retail core was an important element of the Melbourne 2030 vision, in strengthening Melbourne’s capital city functions.

Council fully concurs with the Premiers statement and it is consider that greater reference should be made in the strategy within Policy Direction 4.2 to the need to revitalise the retail

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8 Existing dwelling data from 2001 Census, Proposed Dwelling data based on recent development approvals data
Core. Currently the only direct reference to the retail core revitalisation occurs in Policy Direction 5.10 which deals with Melbourne as a Tourist Destination. Greater emphasis should be made on the role of the retail core in strengthening the CAD.

Knowledge Economy

City Plan 2010 and Council’s Towards a Knowledge City Strategy (2002) aim to “grow Melbourne’s competencies as a globally-recognised, entrepreneurial and competitive knowledge city”. This is reflected in the revised Melbourne MSS.

The initiatives listed for Policy 4.4 are supported and it is welcomed that the links between the State’s biotechnology and innovation strategies and the Metropolitan Strategy have been made. Changes to the VPP’s (such as that highlighted in 4.4.2) are considered important to better reflect the needs of modern advanced manufacturing businesses.

Transport Gateways

The need for enhanced transport gateways within the City is supported by Council. City Plan 2010 contains a strategic direction to “ensure that the City’s transport infrastructure is world competitive and supports the Victorian economy”. Some specific opportunities highlighted in the plan include:

• improve rail access to the Port of Melbourne;
• link the Port with the rail freight network via the Dynon Hub area;
• enhance channels to facilitate port operation; and
• develop a CBD – airport rail/transit link.

Council’s Transport Program, draft MSS and the draft City West End Study all recognise the key gateway role of the Port. Improved rail access to the Port and links with Dynon hub are also supported, especially to increase the percentage of freight on rail and to reduce the volume of traffic on surrounding roads.

The strategy (Initiative 4.3.2) discusses the need to protect the port area by adequate buffers to prevent land use conflict and to enable future development of the Port. While this is supported in principle greater clarification is needed as to what this means on the ground in terms of land use and development of areas around the Port. The concept of a buffer is undefined in the strategy, and should be considered in the actions listed in the draft Transport Implementation Plan regarding port capacity.

The proposed Clause 12 (4.3) contains a policy direction to “ensure planning and development of the Fisherman’s Bend precinct does not jeopardise the needs of the Port of Melbourne as a working port and as one of the State’s most important gateways”. Council does not believe that the Fisherman’s Bend precinct should be specifically highlighted in the way that it has in the draft Clause 12 and recommends removal of this statement. Other statements in Clause 12 that would apply more generally around the Port should be adequate for this area.

As outlined previously in this submission Council has a vision for the development of Port Melbourne as an advanced manufacturing, research and development precinct. The Innovation Statement also highlights this area as an emerging automotive and aerospace cluster.

Whilst wanting to protect the integrity and capacity of the port, recognition must be given (as in Initiative 4.4.2) to the changing needs of advanced manufacturing business many of which are seeking to operate from high quality, high amenity areas. The Activity Centre Policy
Review conducted as part of the background work associated with the Metropolitan Strategy acknowledges that “in many industrial areas of Melbourne, there has been a blurring of traditional distinctions between ‘office’ and ‘industry' with buildings accommodating advanced industrial operations becoming indistinguishable from office buildings”\(^9\).

Recently there has been increasing interest for the establishment of some office developments within the Fisherman’s Bend precinct. In light of the changes in the way modern manufacturing occurs and the comments in the Activity Centre Review, it is not as clear cut as assuming that office developments do not contain nor support the advanced manufacturing uses of the larger precinct.

Council, the Department of Sustainability and Environment and Melbourne Ports Corporation have recently agreed to commission a joint project that will investigate land use issues within the Fisherman’s Bend precinct. The study seeks to developing a better understanding of the needs of the Port, the established businesses in the area, and importantly the nature and needs of businesses that are likely to establish within the Fisherman’s Bend precinct. Developing a better understanding of the needs of advanced manufacturing businesses is a part of this study. The joint study will be of assistance in determining appropriate zones/scheme provisions for such areas – and Council would be willing to participate in any future work in this area. This should provide greater guidance for this area and may also provide greater clarity for the proposed Clause 12.

Communications

Council supports the policy direction regarding continual deployment of broadband services and infrastructure.

**Recommendations:**

- A clear definition of capital city functions is required and this should be mapped to enable consolidation and enhancement of these functions and conversely the role and character of the areas in Central Melbourne that do not fulfil a capital city role to be treated differently.

- *Investigation into the buffer requirements of the port and compatible surrounding land use should occur*

- *Melbourne 2030 should provide a clearly state that housing within the CAD is secondary to its principal uses and the level of residential amenity is to be commensurate with that of a 24 hour city.*

- *Removal of the statement regarding Fisherman’s Bend in Clause 12 (4.3)*

- *Support for the revitalisation of the retail core should be made in Policy Direction 4.2.*

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8. Policy Direction 5 – A great place to be

Comment

Council supports/welcomes the policy directions outlined in this section as essential policies to achieve a more inclusive and engaging city.

Urban Design

Council supports the promotion of good urban design and the urban design directions of Melbourne 2030. The additional direction and priority regarding community safety is also supported – as part of the recent MSS Review Council has increased attention to safety in the revised MSS and local policies.

Neighbourhood Activity Centres

The revised MSS and City Plan 2010 indicate a series of local centres (comparable with neighbourhood activity centres) in the municipality – these include Errol Street, North Melbourne, Domain Road, South Yarra, Wellington Parade, East Melbourne, Sturt Street, Southbank, Macaulay Road, Kensington and Lygon Street in Carlton. All of these centres are served by public transport.

The majority of the City of Melbourne is located within 400-500m distance of one of these centres with the exception of parts of North and West Melbourne, Parkville, South Yarra and parts of Kensington Banks. In some of these centres within the 400m radius there tends to be a diversity of uses however they are not always co-located or in clusters reflecting historical development patterns. Therefore work needs to be done to enhance these centres and encourage and facilitate pedestrian access and promote walking in these neighbourhoods.

Open Space

Council welcomes initiatives 5.7.2, 5.7.4 and 5.7.5 regarding protection of open space values of the Yarra and Maribyrnong Rivers and improved recreational and tourism potential of these corridors. These initiatives are broadly consistent with the strategic direction and opportunities contained within City plan 2010. Unlike the Moonee Ponds Creek or Merri Creek, the Maribyrnong River does not have a co-ordinated management model and this should be considered given its recognition in the strategy.

Some specific opportunities highlighted in City Plan 2010 include enhanced landscaping and recreational access along the Maribyrnong River, integration of the open space system of Docklands with the surrounding open space network, enhanced links to areas, provision of additional open space in areas such as Port Melbourne, North and West Melbourne and Southbank.

With greater densities and increased population in the inner region and associated with Melbourne’s recent and projected continued growth – additional open space will be required to meet the needs of the community. For example in Southbank, the population has increased but there has not been any additional land set aside for open space. Recent consultation conducted as part of the Social Needs Audit indicated that residents believe the area lacks open space, especially local and smaller open spaces. City Plan 2010 indicates that opportunities to develop local open space should be pursued for North and West Melbourne, Southbank, and the Port Melbourne area (for workers).
Council also has a policy of no net loss of open space consistent with the policy outlined in Clause 12 (5.6) and ensuring this occurs will be critical given the increased demand that will be placed on existing open space associated with population increases. The cost of acquisition of open space in the inner city areas is considerable and opportunities for unencumbered/undeveloped open space rare. Preparation of open space strategies to identify opportunities for additional open space in areas undergoing growth is a suggested additional initiative.

The ability to secure land in areas that are already largely developed is also more difficult, putting greater pressure on existing parks and making acquisition/creation of new open space more expensive.

**Recommendation:**

- An additional initiative should be included in Melbourne 2030 regarding the preparation of open space strategies to identify opportunities for additional open space in areas undergoing growth and that this work is an integral part of the “growth planning framework” for inner urban areas.

9. Policy Direction 6 – A fairer city

**Comment**

Council supports/welcomes the policy directions outlined in this section as essential policies to achieve a more inclusive city.

**Social and Affordable Housing**

In particular Council supports the need for increased and well located affordable housing. Within City Plan 2010 it has an objective to “encourage a diverse range of housing options, including affordable housing across the inner Melbourne area and the City of Melbourne to increase the residential population and to meet the housing needs of the community”. The revised MSS also includes this objective. The vision of the Melbourne Social Housing Strategy *Linking People Homes and Communities* (2000) is that “Melbourne is a community that supports individuals, diverse housing options and builds strong and inclusive communities”\(^\text{10}\).

Council is committed to social housing and has worked to achieve the establishment of social housing in the inner city through the Inner City Social Housing Company (ICSHC) which was established in 2000 following a grant from the Council, as well as the provision of direct funding to various housing projects.

Since its establishment the ICSHC has had difficulties attracting additional public or private funding that would enable significant provision of affordable housing. Such funding is important to enable funds for the purchase/development of properties as well as to cover operational costs. Securing funds on the market is difficult. With the various models of social housing provision, all models have at least one thing in common – the net return from social housing operations, that is rent after operating and maintenance costs, is well below the market cost of funds raised through either debt or equity mechanisms. The gap between what social housing operations can support by way of capital servicing and what the providers of private capital require must be made up by some form of subsidy.

\(^\text{10}\) Social Housing Strategy, P8.
The March 2001 Rental Report produced by the Department of Human Services indicates that only 2% of housing stock in the City of Melbourne is affordable (and the median cost is continuing to increase).

It is considered that the initiatives in Melbourne 2030 do not go far enough to seriously increase the supply of affordable and social housing in Melbourne, especially in the inner region where housing costs are high.

Initiative 6.1.5 is to develop and implement initiatives to increase the supply of affordable housing throughout the metropolitan area. This issue has been studied many times in Australia and internationally and most recently in March 2002 in the final report of the State and Local Government Affordable Housing Steering Committee. There have been repeated calls for provision of social housing and it is considered that on the ground mechanisms to achieve this should be developed rather then the need for further investigation.

The Planning Institute of Australia’s Liveable Communities National Agenda calls for action on affordable housing at all levels of government and it is important that if the policy direction regarding an increase in the supply of affordable housing is to be achieved the State Government must commit to funding such increases. A range of mechanisms including mechanisms for local government need to be provided so that Councils have the ability, if they chose, to act to increase the supply of affordable/social housing in their municipality.

Ways of pursuing affordable housing must be dealt with in regional and local housing strategies. The draft Housing Implementation Plan contains the development of regional housing strategies as short term action, yet the action regarding increase the supply of affordable housing is a medium term action. This should be elevated in priority so that Councils have tools available to achieve affordable housing when preparing local housing strategies.

The strategy and its initiatives rely heavily on the Urban and Regional Land Corporation and Office of Housing programs to increase the supply of affordable housing. It is considered that this will be inadequate and has shown to be inadequate in the past with issues of affordability again escalating.

The proposed wording for Clause 12 of the SPPF (12.05-6) regarding social housing is unclear and not considered achievable without greater capacity of local government through the planning system to access funds or ensure the direct provision of affordable housing as part of development. The proposed Clause 12 states that a “significant proportion” of new development should be affordable housing – what is significant and how is this to be achieved? Using current proportions as a guide, with the current level of public housing provision in the City of Melbourne of 8% – this would mean that 7,200 households of the forecast population growth of 90,000 households for the inner region would need to be provided with social housing.

**Recommendations:**

- **That investigation into mechanisms to achieve an increase in affordable housing, become a short term priority of the Housing Implementation Plan rather then a medium priority including mechanisms such as levying development contributions for affordable housing through the Planning and Environment Act.**

- **Local and Regional Housing Strategies be required to contain strategies to address affordable and social housing provision.**
• State Government agencies, such as the Office of Housing and the URLC be party to the preparation and implementation of local and regional housing strategies

• An affordable/social housing target be set for each region and that the State Government commit to funding/develop strategies to ensure provision of social housing that is proportional to the growth that is forecast to occur in each region.

• That the State Government work with the Planning Institute of Australia at a national level as part of the Liveable Communities National Agenda (2000) to gain Federal Government action on affordable housing.

• That Clause 12.05-6 6.1 be amended to clarify what a “significant proportion of development……. be affordable to households on low to moderate incomes” is.

Social Infrastructure Provision

Policy 6.2 and 6.3 support the planning, co-ordination and provision of social infrastructure in a more equitable and timely manner. While these policies focus primarily on outer areas and newly developing communities on the urban/rural interface, and is supported, again greater attention should also be paid to planning social infrastructure for changing and growing areas in inner Melbourne.

Initiative 6.2.1 is supported however there is no way of knowing how this will occur – the initiative (as is the case with many others) needs to more clearly linked in with an action or some other process to ensure that this occurs.

Recommendations:

• That planning for social infrastructure be an integral part of regional/local housing strategies and structure plans for all principal, major and neighbourhood activity centres.

• That Clause 12.05-6 6.2 be amended to ensure that gaps and deficiencies in social and cultural infrastructure are identified.

• That Clause 12.05-6 6.3 be amended to apply not only to new areas but to areas (within established suburbs) that are undergoing substantial increases in population.

Arts, Recreational and Cultural Facilities

Council supports the policy of developing a strong cultural environment and increasing access to arts, recreation and other cultural facilities. In particular initiatives 6.4.1 and 6.4.2 relating to the Yarra Arts Precinct and the Royal Melbourne Showgrounds are supported. Some specific arts, recreation and cultural facilities opportunities highlighted in City Plan 2010 include:

- Enhance the MCG and Sports and Entertainment Precinct
- Enhance the Northbank and Southbank and greater links between the facilities and venues within the Arts Precinct including Federation Square
- Develop a new Plenary Hall to augment the Convention Centre and the City’s ability to attract international conventions
- Pursue potential use of Melbourne Showgrounds for broader open space and recreational opportunities.
The opportunity also exists while retaining the Melbourne Showgrounds for major events and activities to better utilise this resource for broader open space and recreation opportunities – this should be considered in any redevelopment.

**Recommendations:**

- In the redevelopment of the Melbourne Showgrounds opportunities that may exist to utilise this space to serve local open space and recreational objectives should be explored at the same time as enhancing its role as a major year round recreational venue.

**Universal Access**

The strategy should contain an initiative to enhance building code provisions regarding universal access.

**10. Policy Direction 7 – A greener city**

**Comment**

One of the main directions in City Plan 2010 to help achieve the overall vision of sustainability is for Melbourne to be an Environmentally Responsible City. Four strategic directions have been developed by the Council to work towards this. They are to:

- Reduce greenhouse gas emissions generated in the City
- Encourage efficiencies in resource use and waste reduction within the City
- Protect and enhance the City’s biodiversity
- Encourage environmental leadership opportunities for Melbourne’s business community; and

- Create a sustainable built form for the City

Council is committed to reducing its own greenhouse gas emissions to 30% by 2010 and those throughout the municipality by 20% by 2010. We have recently adopted a zero emissions strategy to increase our actions within this arena and to work towards zero emissions by 2020. A draft Sustainable Water Management Strategy (2002) has also been prepared which has a potable water reduction target for the municipality as whole of 15% by 2020. As a part of this Council itself would be committing to reducing its water consumption by 20%. Council’s Waste Management Strategy is seeking to reduce the level of waste by 10% over 2002-05.

Council therefore supports the policy direction of a greener city and the policies and initiatives contained within it.

**Water**

Council supports the initiatives listed for more sustainable use of water resources, especially 7.1.2 and 7.1.4 which are also consistent with actions contained within its draft Sustainable Water Management Strategy. The recently prepared Ecologically Sustainable Buildings local policy also contains objectives to encourage new developments to maximise water efficiency and to encourage new development to minimise stormwater runoff by reusing rainwater and recycling waste water. It is intended that the policy will be updated at a later date once detailed provisions/standards and systems are available that are able to be used in the assessment of planning permit applications.
Greater links should be made between Melbourne 2030 and the State Government Water Resources Strategy in terms of targets and actions to drive decreases in water use and improved efficiency.

In relation to stormwater management and water sensitive urban design (Initiative 7.4.6) with the shift to development in established areas primarily strategic redevelopment sites greater attention should be given to the inclusion of water sensitive urban design treatments into multi unit developments and redevelopment of existing buildings. There are many examples available of the application of Water Sensitive Urban Design principles in unit dwellings and greater recognition/promotion of this should occur.

The opportunity exists to ensure that Activity Centre Structure Plans and potentially housing strategies address water sensitive urban design opportunities and stormwater issues. These matters should be considered as inputs to structure plans.

**Greenhouse Gas emissions**

Initiative 7.3.1 should be strengthened to do more than simply encourage the inclusion of energy efficiency standards for office buildings into the BCA. Council’s recently prepared Ecologically Sustainable Buildings Policy sets energy efficiency standard for office premises at 4 stars using the Australian Building Greenhouse Rating Scheme. The introduction of five star energy ratings for commercial buildings, as well as other buildings is essential.

**Clause 12**

Policy 7.3 – the implementation strategy regarding protection of greenhouse sinks, whilst positive, is not considered to be clear in its current wording. The term greenhouse sink is not defined in Melbourne 2030 and sinks as such are not clearly identifiable in any government strategy. The strategy is essentially about preventing land clearance and it would be clearer to indicate that.

**Recommendations:**

- A new initiative be added to include provisions/performance criteria in the SPPF that indicate what steps would be undertaken to achieve greater water efficiency in developments.

- Strengthen initiative 7.3.1 to change the Building Code of Australia to drive the inclusion and introduction of energy rating for all new office buildings.

- A new initiative should be added to amend Clause 54 and 55 of the VPP’s to include water sensitive urban design criteria when considering the design of single and multi-unit residential developments.

- Activity Centre Structure Plans and potentially housing strategies address water sensitive urban design opportunities and stormwater issues.

- That the term greenhouse sinks in Clause 12 be defined and these sinks be identified, or the policy statement be amended to provide guidance on land clearance.
11. Policy Direction 8 – Better transport links

Comment

City Plan 2010 contains three main strategic directions regarding transport:

- Ensure that the City’s transport infrastructure is world competitive and supports the Victorian economy.
- Ensure a sustainable and highly integrated transport system services city needs and links key assets.
- Increase public transport services and use.

As the capital city it is essential that the transport network maximise access across the metropolitan area to the Central City in an efficient, equitable and sustainable manner. Over half a million people travel to the Central City on a daily basis for business, shopping, education and leisure making it the key attractor within Melbourne. Throughout the metropolitan network there are specific deficiencies that limit access and mode choice to the City and these should be addressed – for example access to the City from the west via public transport is limited. It is important that in preparing transport plans for growth areas opportunities to improve transport choice to not only nearby activity centres but also the Central City are maximised. Overall the transport directions and implementation plans do not recognise this need.

The policies and initiatives contained in the Strategy and draft Transport Implementation Plan are fairly general in nature and are not specific enough to address known improvements or bottlenecks within the transport network. The draft Transport Implementation Plan does not add benefit to the overall Strategy. Without detailed strategies regarding transport improvements it is difficult to provide comment on the draft implementation plan and the transport directions of the strategy.

Road Network

The recognition that road reserves are finite resources that need to be managed in an efficient manner is welcome. In determining the most sustainable use of this resource consideration must be given to the different development patterns and types throughout Melbourne – for example in parts of the inner city many older terraces do not have off street parking or loading facilities and therefore rely on access to on street facilities. Recognition must therefore be given to the fact that arterial roads in the inner area perform a multifunctional role – i.e. carrying through traffic, local traffic and servicing abutting properties.

Support is given to the intention to increase the percentage of freight that is moved by rail, and any freight that is moved by road should be restricted to arterial roads as opposed to local roads such as Kensington Road, Macaulay Road and Gatehouse Street.

Greater recognition is needed regarding known bottlenecks in the transport system. The Infrastructure Planning Council report recommended studies into the Westgate Corridor and the expansion of the underground loop – neither of these issues have been recognised in the strategy.

The stated bias in the draft Transport Implementation Plan (Page 11) of focusing road investment in outer suburbs is of concern and is premature prior to the completion of the various plans and studies listed in the draft Implementation Plan – such as the metropolitan road and traffic management strategy, and the various public transport plans.
Page 7 of the Transport Implementation Plan contains an estimated cost of road congestion by 2020 – details should be provided of how this figure was determined.

With recognition in the strategy that the road network will remain the key element of the region’s transport network in terms of private vehicle use and freight, the strategy should contain an initiative to support/fund research and development into improvements in emissions reduction and use of alternative fuel sources.

**Public Transport Improvements**

In supporting increased transport use and greater bus usage across metropolitan Melbourne greater planning for bus/transport interchanges is needed including within the Central City. Currently within the Central City there is not a co-ordinated bus train/tram interchange and opportunities such as the redevelopment of the Spencer Street station should be utilised to meet this need. Development of the Bus Plan (Action 1 of the Transport Implementation Plan) should address this need.

Specific improvements to the public transport network within the City of Melbourne that Council would support include:

- Improved public transport services to Port Melbourne/Fisherman’s Bend employment area.
- Improved public transport links with the Docklands

The provision and reliability of public transport is a critical issue. In particular out of hours operating times and on weekends. Safety and comfort on public transport must be improved as well as provision of real time information.

Water transport is an initiative supported by the City of Melbourne and has not been adequately recognised as a potential complementary transport mode that should be investigated especially with increasing emphasis on the Yarra River and the enhancement of major attractors within this corridor eg Docklands and the Sports and Entertainment precinct.

Enhancement of the Richmond station is an opportunity highlighted in City Plan 2010 and the Yarra Plan that should be recognised as a major enhancement to public transport infrastructure.

**Parking**

Recognition and support should be given to the parking limitation policies that exist in the Melbourne Transport Strategy (1997) and in Melbourne planning scheme. The existing policy objective of maximising access to meet the needs of shoppers and short term visitors and encouraging commuters to use public transport is still valid and the review referred to in initiative 8.8.5 should focus on effective implementation mechanisms rather than the policy basis/objectives. The initiative to regarding review of car parking policies in principal and major activity centres is also supported. Linked with the Melbourne 2030 initiatives to enhance public transport provision to activity centres, the policy of discouraging unnecessary commuter car parking should also apply to principal and major activity centres through the metropolitan area. Additionally, support should be given to the creation of park and ride schemes outside of the City of Melbourne, to support access to the Central Activities District.

Other then this initiative (8.8.5) Melbourne 2030 does not adequately provide policy direction regarding car parking or the way car parking is to be dealt with in planning schemes, especially in the light of the other initiatives regarding travel demand management and integrated transport plans for major new developments. In parking reviews, consideration should also be given to motorcycle parking. It is anticipated that their use will grow as a...
convenient mode of travel in dense city environment and provision for parking needs to be recognised in all activity centres.

Bicycles

While the initiatives on cycling are welcome a clearer statement is needed on the role of cycling as a transport mode. The policy to give “more priority” to cycling and walking is not a clear policy statement when compared with the policy objective to achieve 20% of vehicle trips being on public transport by 2020 and comparable targets for freight. The role of cycling consequently is unclear and opportunities to strengthen cycling as a main stream transport mode are not fully realised through the strategy.

This lack of clarity is seen in the proposed Clause 12 where greater direction on the need for provision of cycle facilities and the cycle network are unclear – for example there is a statement to “improve roads in developing outer-suburban areas to cater for car, public transport and freight, commercial and service users” – yet no mention is made of provisions for cycles. Terms such as “more priority” are not particularly helpful in a statutory sense. In conjunction with the proposed changes in Clause 12 other parts of the SPPF (Clause 18) require amending as they only require cycle facilities to certain types of uses. This should be updated.

Initiatives 8.7.1-8.7.5 are supported. As part of Amendment C60 to the Melbourne Planning Scheme Council has recently proposed the introduction of a new local policy dealing with Bicycle Parking and Facilities in recognition of the need to adequately provide for and encourage cycling and walking.

A new initiative should be added to ensure that activity centres are not only connected to public transport but also to a network of bicycle lanes through an expanded and revamped Principal Bicycle Network that reflects the activity centre network.

Integrated Transport Studies

Associated with the Flinders Street west urban development, Council and the State Government have agreed to co-operate in the development of a transport strategy for the Yarra Precinct including access to and from the south west part of the City. The Transport Implementation Plan should acknowledge this agreement.

Various area specific studies are referred to in the draft implementation plan; as well as modal studies eg tram plan. It is important that this information feeds into and forms part of an overall metropolitan transport plan that complements the implementation plan.

Clause 12

Policy direction 8.7 – give “more priority” to cycling and walking in planning urban development does not provide clear policy direction – is it more priority than currently more priority than other modes?

Recommendations:

- That the strategy be amended to recognise the need to improve access to the central city.
- That a revised implementation plan be prepared containing greater detail on initiatives and improvements following the completion of the various plans/studies outlined in the draft implementation plan.

An implementation plan is required for this policy direction. In order for this policy direction to be given maximum effect, it is also critical that priorities are identified for the initiatives described.

The direction promotes a broad range of initiatives including education, training, certification, use of technology, review of the planning system, monitoring program, etc. All of these are worthy but require commitment of resources and a timeframe from the State Government in order to ensure their delivery.

Given the range of initiatives suggested for improving the performance and quality of outcomes under the planning system, perhaps there is the case for establishing an independent standing advisory committee to oversee the implementation of Direction 9.

Implementation of Initiative 9.2.2 (improved decision making processes) should build on the recommendations of the ‘Whitney Report’ on local planning policy (October 2002).

Whilst initiative 9.1.3 (reducing the need for planning approvals) is supported in principle, it is unclear how this initiative will be progressed. There is a case for ‘freeing up’ the planning system from having to deal with very minor buildings and works applications. However, a representative process for undertaking such a review should be outlined in the strategy or any subsequent implementation plan.

Policy 9.3 (keeping Melbourne 2030 up to date) is admirable but lacks specificity. Whilst annual reporting on ‘achievements’ arising from the plan is a start, what is really needed is a comprehensive and rigorous monitoring framework. The absence of a detailed monitoring section in Melbourne 2030 is a significant gap.

Policy 9.4 (local government partnerships) is supported in principal. However, as previously stated by the local government sector, a genuine partnership must be more than ‘we tell, you do’. For example, whilst the forthcoming local government funding program is supported, it is important to recognise that:

- The local government sector has already undertaken significant, high quality strategic planning work. For instance, many local governments are well advanced in implementing local structure plans for activity centres.
- Many local governments have already identified local priority planning issues facing their communities, and the forthcoming discussion in respect to ‘local government planning work programs’ should respect this fact.
- Before detailed discussions can occur about local government implementing Melbourne 2030, we expect that any comments made in respect to the Strategy will be seriously considered by the State Government. As that strategy acknowledges, (page 164) strategy setting and implementation can and should be an iterative process.

Policy 9.5 (community involvement) lacks substance and requires further detailed commitments to give it legitimacy. Community building and place management is potentially powerful techniques to engage local communities. However, really good working examples are few and far between – the words appear far more frequently than practical actions do.

Some form of a decision making and accountability framework is required to make this more legitimate. For instance what guidelines will be applied to guide government on when it is appropriate to invite community input to major projects, what government structures will be put in place to support ‘place management’.
Recommendations:

- An implementation plan should be prepared for the initiatives described in policy 9.

- Consideration should be given to establishing a Standing Advisory Committee to guide government on the implementation of Direction 9.

- Any implementation Plan for Direction 9 should enable the key recommendations of the ‘Whitney Report’ on local planning policy (October 2002) to be implemented.

- A representative process for reviewing the planning permit requirements under the VPPs should be established.

- A detailed monitoring program should be established for Melbourne 2030.

- The partnership with local government outlined in policy 9.4 should fully recognise the current state of play within local government, namely that;
  - many local governments have undertaken significant strategic planning work over the past five years;
  - local governments’ current capacity to undertake significant new strategic planning work in the near future is limited and;
  - local government has its own views on what the most significant strategic planning issues are within its local communities.

- Further work should be done to establish a decision making and accountability framework to support policy 9.5.

13. Conclusion

Council welcomes the release of Melbourne 2030 and looks forwarding to discussing the issues in the submission in more detail and working to achieve a more thriving and sustainable Melbourne.
Attachment 1

Comments on the Draft Clause 12

These comments are aimed to assist in the useability and clarity of the proposed Clause 12 of the SPPF.

Clause 12.04

- The principles provide a useful snapshot of the underlying principles of the Metropolitan Strategy. However, it is unclear how the principles will be used in decision making as they are very broad.

- The definition of sustainability should be regarding the pursuit or progression of economic, social and environmental matters, rather then simply their consideration. Whilst consideration of these three elements would lead to a better outcome, in order to be more proactive in working towards sustainability decisions should aim to progress all three elements.

Policy 1.1

- 12.05-1 – Direction 1 – A more compact city – It is not clear from the direction that a more compact city is envisaged. It is unclear what “take full advantage of” means on the ground.

- Policy 1.1 – The term “build up” could be misinterpreted as meaning high rise development.

- By only having activity centres as the focuses for business, shopping, working, leisure and community facilities – this doesn’t adequately take into account areas within the City of Melbourne such as West Melbourne, East Melbourne, St Kilda Road and other areas where there would still be business uses.

- Reference should be added to the entertainment, cultural and sporting role of the Central Activities District.

- In the points under Major Activity Centres reference is made to the potential to grow and support intensive housing developments without conflicting with surrounding land uses. One of the issues that City of Melbourne has been dealing with is how to facilitate increased residential development in a way that does not lead to conflict with existing and potentially future uses such as bars and nightclubs. With the zones that are available in the VPP’s this policy may be difficult to achieve.

- Under Specialised Activity Centres, the policy does not recognise that mixed uses may not be appropriate in all specialised centres. The policy does not recognise the importance of amenity issues especially for residential activities.

- Under Specialised Activity Centres, the fourth policy is not clear. Reads as though Specialised Activity Centres should be moved to be on the Principal Public Transport Network. Policy should apply to new centres or existing centres should be linked to the Principal Public Transport Network.
• Under Neighbourhood activity centres, the policies do not address the issue of the loss of retailing in many neighbourhood centres eg the loss of banks.

Policy 1.2

• The policy to discourage proposals for expansion of activities outside of activity centres will create difficulties for the City of Melbourne and should be amended.

Policy 1.3

• Some of the preferred locations for higher density housing developments are unclear. For example, “In or beside Neighbourhood Centres...”.

Policy 2.2

• Greater clarification is needed as to what “significantly higher then 10 dwellings per hectare” means. 10 dwellings per hectare is also a fairly conservative figure and less then what currently happens.

Policy 2.3

• Policy direction on infrastructure provision should also be provided for the established urban areas where 70% of the population growth that will occur over the next 30 years is to be housed.

Policy 4.1

• The policy regarding prevention of loss of industrial land to uses that are better located in activity centres is supported. However it is considered that there needs to be a better understanding of recent and emerging trends in industrial development that may differ from uses that have traditionally located in industrial zones.

Policy 4.2

• Capital city functions should be defined
• The Yarra River precinct should be defined
• Unclear what “mixed residential and commercial precincts” are.
• Reference is made to the Parkville precinct but not to the Knowledge Precinct or the Alfred precinct. These areas also need to be defined to create greater certainty in the implementation of the policy.
• Reference to the revitalisation of the Retail Core should be added.

Policy 4.3

• Greater clarification and definition is required to set clear direction as to what an “adequate buffer” around the port would be.
• The policy statement regarding land use and development in Fisherman’s Bend is unclear and is not considered easy to implement. All agencies involved in planning and land uses in the Port and Fisherman’s Bend should consider this issue and provide clearer direction regarding the needs of the Port and also the land use opportunities in Fisherman’s Bend.
• Many of the intermodal freight terminal locations are known and should be listed to increase awareness of their location.
Policy 4.5

- Greater direction should be given in policy 4.5 as to how broadband infrastructure could be provided through development.

Policy 5.1

- Not clear what “diversity and choice” in the first bullet point is referring to. Is it referring to housing or something broader?
- Rivers and creeks should also be listed as sensitive landscape areas.
- The concept of transport corridors should be further defined.

Policy 5.2

- There is a high degree of repetition with Policy 5.1 – there may be the opportunity to link these two policy statements.
- Term “distinctive urban form” should be better explained. Not clear if this is referring to a particular building or a broader area.

Policy 5.6

- Reference should also be added to ensuring that any commercial activities that occur in parks are linked with the management objectives of the park.
- The term “transfer” of open space is used in this policy – it is unclear what the term transfer means and whether it is different to the usual processes of acquisition and designation of open space.
- Ensure that public access is also provided along river banks as well as stream banks and foreshores.

Policy 5.7

- Definition of the “lower Yarra River” is needed.

Policy 5.10

- Recognition of the role of city precincts and promenades is positive, however the current working of Policy 5.10 does not give any clear direction as to how or why they should be developed – ie to enhance the individual character and roles of the different precincts.

Policy 6.1

- Clarification is required as to what a “significant proportion of new development to be affordable for households on low to moderate incomes” actually is. The term significant is not helpful in terms of implementation and interpretation of this Clause – a target would be more helpful.
- The policy of a significant proportion is also considered to be unachievable given the current provisions of the Planning and Environment Act and the development contributions framework.

Policy 6.3

- Reference should also been made to the provision of infrastructure in existing areas as well as new development areas.
Policy 7.1

- Opportunities for greywater and/or effluent recycling on large sites should also be highlighted/sought.

Policy 7.3

- The term greenhouse sink isn’t defined in Melbourne 2030 and the location of the sinks are not shown.

Policy 7.6

- This policy does not add any new material. The notion of integration of land use and transport is important for the whole strategy, and should be listed as a principal up front in Clause 12.04.
- Alternative modes of transport eg walking and cycling should be promoted.

Policy 7.7

- Regional Catchment Strategies should also inform and guide planning schemes and their provisions as well as landcare project, whole farm plans etc.
- Reference should also be made to the nationally significant grasslands located to the north and north west of Melbourne.

Policy 8.3

- More guidance is needed on what size development triggers the need for an integrated transport plan.

Policy 8.5

- Not clear what managing the road system to achieve “balance” means.
- Reference should also be made to improving roads in outer suburban areas to cater for bikes as well as cars, public transport etc.
- There does not appear to be clear direction on the preferred treatments for bicycles – eg opportunities should be sought to provide for both on road and off road bicycle paths.

Policy 8.6

- The implementation methods should be enhanced. For example, the environmental impacts of transport infrastructure should be considered during development.

Policy 8.7

- The policy requires that more priority be given to cycling and walking in planning urban development. The term “more priority” is not particularly useful in terms of providing direction of the level of bicycle and walking infrastructure that would be satisfactory.

Policy 8.8

- The policy to “Promote the use of sustainable personal transport options.” Requires clarification.
FINANCE ATTACHMENT

MELBOURNE 2030 – PLANNING FOR SUSTAINABLE GROWTH

A grant of $30,000 has been received from the Department of Sustainability and Environment to assist Council in the preparation of a response to the submission.

Joe Groher
Manager Financial Services
LEGAL ATTACHMENT

MELBOURNE 2030 – PLANNING FOR SUSTAINABLE GROWTH

There are no direct legal implications arising from the recommendation contained in this report.

Melbourne 2030 contained a number of draft implementation plans to which Council was requested to respond. This response has been prepared in accordance with this request.

Kim Wood
Acting Manager Governance Services