

Report to the Future Melbourne Committee

Agenda item 6.4

City of Melbourne submission to the Victorian Government's Draft Inner Metro Land Use Framework Plan

Presenter: Sophie Handley, Director City Strategy

9 November 2021

Purpose and background

1. The purpose of this report is to seek endorsement of the City of Melbourne's submission to the Department of Environment, Land, Water and Planning (DELWP) on the Draft Inner Metro Land Use Framework Plan (IMLUF) (refer Attachment 2).
2. The Inner Metro includes the Cities of Melbourne, Port Phillip and Yarra. The IMLUF has been developed by DELWP to guide the application of Plan Melbourne's principles at a regional and local level. The IMLUF is a 30-year strategic vision which provides guidance on how the Inner Metro will: shape population and employment growth; inform service and infrastructure development; guide public and private investment; protect its distinctive and historic characteristics; and improve environmental resilience. A copy of the draft IMLUF is available on the Victorian Government's Engage Victoria website.
3. The IMLUF sets out how the Region will achieve the above under six key themes: productivity; housing choice; integrated transport; liveability; strong communities; and sustainability and resilience. The IMLUF was on public exhibition from 24 August until 24 October 2021. Council received an extension of time until 10 November to allow FMC consideration, provided that a draft officer level response was submitted before 24 October.

Key issues

4. The submission offers support for 59 per cent of the initiatives; in principle support with clarification required for 18 per cent of the initiatives; in principle support subject to addressing comments for 19 per cent of the initiatives and the submission does not support four per cent of the initiatives within the IMLUF. The following require further consideration:
 - 4.1. Clarify future consultation opportunities on the proposed planning scheme amendment to introduce the IMLUF into the Melbourne Planning Scheme.
 - 4.2. Regular revision of forecasts are required to ensure they remain relevant. Population forecasts have a direct impact on housing targets and will require revision to ensure accuracy post COVID.
 - 4.3. Precinct boundaries need to be clarified to ensure all maps are accurate. In particular, the removal of Royal Park from the Parkville NEIC and the correction of the boundaries of the Macaulay precinct.
 - 4.4. Information on the Docklands to Richmond renewal precinct is requested given the potential impact this will have on the City of Melbourne.
 - 4.5. Strengthening strategies that recommend the early provision of public transport and social infrastructure through appropriate actions. In the Inner Region active and sustainable transport plays a vital role in supporting vibrant employment precincts and catalysing change. All streets should be pedestrian and cycle friendly.
 - 4.6. Broadening the classification of social infrastructure to include arts and culture.
 - 4.7. Strengthening actions related to sustainability and environmentally sustainable design. Sustainable development requirements should be applied to all development and not be limited to activity centres and urban renewal areas, or specific sizes or types of development.
 - 4.8. There is a need for a mechanism in the planning scheme to enable Council to balance the provision of commercial and residential development in select locations.
 - 4.9. Good contextual design should be universal and not be limited to activity centres and urban renewal areas, or specific sizes or types of development.

5. Extensive internal consultation was undertaken across City of Melbourne. External stakeholder consultation involved officer discussion with the City of Yarra and City of Port Phillip, where there was alignment on the key items for consideration.

Recommendation from management

6. That the Future Melbourne Committee endorse management's submission to the Inner Metro Land Use Framework Plan (refer Attachment 2 of the report from management).

Attachments:

1. Supporting Attachment (Page 3 of 56)
2. City of Melbourne submission to Draft Inner Metro Land Use Framework Plan (Page 4 of 56)

Supporting Attachment

Legal

1. There are no legal implications associated with this submission process.

Finance

2. There are no financial implications associated with this submission.

Conflict of interest

3. No member of Council staff, or other person engaged under a contract, involved in advising on or preparing this report has declared a material or general conflict of interest in relation to the matter of the report.

Health and Safety

4. In developing this proposal, no Occupational Health and Safety issues or opportunities have been identified.

Stakeholder consultation

5. The City of Melbourne is responding to a DELWP consultation.

Relation to Council policy

6. In preparing this submission, City of Melbourne considered the policy positions established through:
 - Council Plan 2021-2025
 - Community Vision 2021-2031
 - Green our City Strategic Action Plan 2017-2021
 - COVID-19 Reaction and Recovery Plan 2020
 - Greenline Implementation Plan 2021
 - Municipal Integrated Water Management Plan 2017
 - Maribyrnong Waterfront: A way forward 2020
 - Yarra River – Birrarung Strategy 2019
 - Arts Infrastructure Framework 2016-2021
 - Economic Development Strategy 2031
 - Open Space Strategy 2012
 - Transport Strategy 2030
 - Affordable Housing Strategy 2030
 - Creative Strategy 2018-2028
 - Climate Change Adaptation Strategy Refresh 2017
 - Heritage Strategy 2013
 - Urban Forest Strategy 2012-2032
 - Submission to Infrastructure Victoria's Infrastructure Strategy 2021-2051

Environmental sustainability

7. Environmental sustainability was a specific area of focus within the IMLUFP and has been addressed accordingly.

Safe. Diverse. Empowered

Draft Inner Metro Draft Land Use Framework Plan

Submission by Melbourne City Council

Acknowledgement of Traditional Owners

The City of Melbourne respectfully acknowledges the Traditional Owners of the land, the Wurundjeri Woi Wurrung and Bunurong Boon Wurrung peoples of the Eastern Kulin and pays respect to their Elders past, present and emerging. We are committed to our reconciliation journey because, at its heart, reconciliation is about strengthening relationships between Aboriginal and non-Aboriginal peoples, for the benefit of all Victorians.

Melbourne.vic.gov.au

CITY OF MELBOURNE

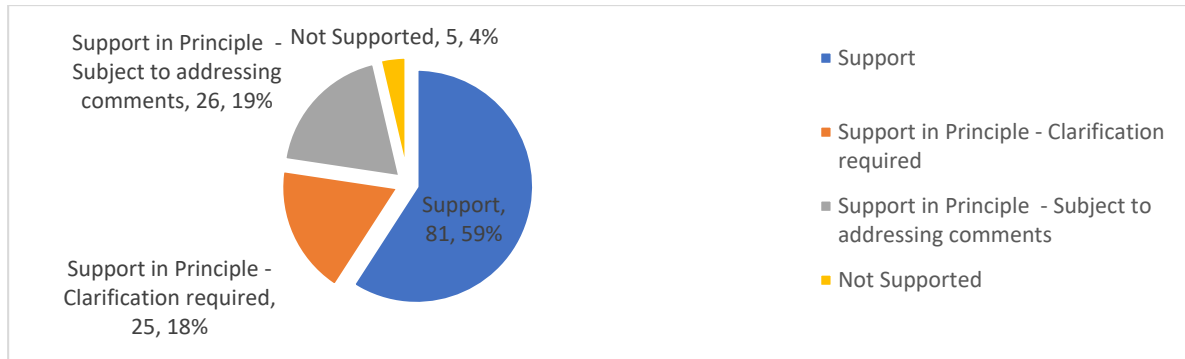
Draft Inner Metro Land Use Framework Plan Submission

Executive Summary

The following submission outlines the City of Melbourne's responses to the Inner Melbourne Land Use Framework Plan (IMLUF), which will guide planning for Inner Melbourne over the next 35 years.

The City of Melbourne submission outlines key considerations, as well as specific comments on each of the themes and their corresponding directions, strategies and actions.

Overall, the City of Melbourne maintains a level of support for the IMLUF, but identifies key areas requiring further consideration, which include:



- Clarifying future consultation opportunities on the proposed planning scheme amendment.
- Regular revision of forecasts to ensure they remain relevant for the purposes of the IMLUF. Population forecasts have direct impact on housing targets and will require revision to accommodate the Inner Metro region and to strengthen accuracy post COVID-19.
- Clarifying precinct boundaries to ensure all maps are accurate. In particular City of Melbourne requests the removal of Royal Park from the Parkville NEIC and the correction of the boundaries of the Macaulay precinct.
- Information on the Docklands to Richmond renewal precinct is requested given the potential impact this will have on the City of Melbourne.
- Strengthening strategies that recommend the early provision of public transport and social infrastructure through appropriate actions. In the Inner Region active and sustainable transport plays a vital role in supporting vibrant employment precincts and catalysing change. All streets should be pedestrian and cycle friendly.
- Broadening the classification of social infrastructure to include arts and culture.
- Strengthening actions related to sustainability and environmentally sustainable design. Sustainable development should be universal and not be limited to activity centres and urban renewal areas, or specific sizes or types of development.
- The need for a mechanism in the planning scheme to enable Council's to balance the provision of commercial and residential development in specific location.
- Good contextual design should be universal and not be limited to activity centres and urban renewal areas, or specific sizes or types of development.

The City of Melbourne recognises the value of a regional approach and requests that DELWP reinforces the importance of the Inner Metro Region as the centre of economic and cultural infrastructure and for a wide diversity of uses 24 hours a day, 7 days a week including office and commercial, cultural, leisure, entertainment, research, educational and residential uses.

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

The City is the venue for many major events and festivals attracting visitors from the metropolitan area, Victoria, interstate and globally.

As a result, it is important that DEWLP broaden its definition of social infrastructure to encompass arts and culture, as well as recreation more broadly in recognition of the value these activities provide across Metropolitan Melbourne.

The City of Melbourne welcomes further opportunities for feedback as DELWP finalises the IMPLUFP.

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

Contents

Executive Summary	3
1. Introduction	7
1.1. Submission Structure	7
1.2. Referenced Policies	7
2. General Considerations.....	9
2.1. Clarification of scope.....	9
2.1. Maps and Precincts	9
2.1. Variability with Forecasts.....	11
2.2. United Nations Sustainable Development Goals.....	12
2.3. Implementation Schedule	12
3. Productivity Theme.....	13
3.1. Review of Directions, Strategies and Actions	15
3.2. Additional Considerations.....	23
4. Housing Choice Theme	24
4.1. Review of Directions, Strategies and Actions	25
5. Integrated Transport Theme.....	31
5.1. Review of Directions, Strategies and Actions	32
5.1. Additional Considerations.....	36
6. Liveability Theme	37
6.1. Review of Directions, Strategies and Actions	37
7. Strong Communities	42
7.1. Review of Directions, Strategies and Actions	43
7.2. Additional Considerations.....	46
8. Sustainability and Resilience.....	47
8.1. Review of Directions, Strategies and Actions	48
9. Conclusion.....	53

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

List of Tables and Figures

Table 1-1 Definition of City of Melbourne responses.....	7
Figure 1-3 Precinct maps as IMLUPF.....	9
Figure 1-4 City of Melbourne municipality map with precincts identified.....	10
Figure 1-2 City of Melbourne COVID-19 Reactivation and Recovery phases.....	11
Figure 1-1 United Nations Sustainable Development Goals (SDGs).....	12
Figure 2-1 Contribution to Gross State Product by Region.....	13
Figure 2-2 City Analytics and Spatial Network Analysis for Multimodal Urban Transport Systems.....	14
Figure 2-3 Summary of City of Melbourne responses to Productivity Theme.....	15
Table 2-1 Comments on Directions, Strategies and Actions for Productivity Theme.....	23
Figure 3-1 City of Melbourne Affordable Housing Shortfall.....	24
Figure 3-2 Net benefit from community housing.....	25
Figure 3-3 Summary of City of Melbourne responses to Housing Choice Theme.....	25
Table 3-1 Comments on Directions, Strategies and Actions for Housing Choice Theme.....	30
Figure 4-1 City of Melbourne 2030 Proposed Integrated Transport Network.....	31
Figure 4-2 Summary of City of Melbourne responses to Transport Theme.....	32
Table 4-1 Comments on Directions, Strategies and Actions for Housing Choice Theme.....	36
Figure 5-1 Summary of City of Melbourne responses to Liveability Theme.....	37
Table 5-1 Comments on Directions, Strategies and Actions for Housing Choice Theme.....	41
Figure 6-1 Summary of City of Melbourne responses to Strong Communities Theme.....	43
Table 6-1 Comments on Directions, Strategies and Actions for Strong Communities Theme.....	46
Figure 7-1 Emissions by sector within the City of Melbourne (2017).....	47
Figure 7-2 Summary of City of Melbourne responses to Sustainability and Resilience Theme.....	48
Table 7-1 Comments on Directions, Strategies and Actions for Sustainability and Resilience Theme.....	52
Table 1-1 Definition of City of Melbourne responses.....	53
Figure 8-1 Overall level of support from City of Melbourne for the Draft IMLUPF.....	53

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

1. Introduction

The City of Melbourne has taken this opportunity to provide feedback on the Draft Inner Metro Land Use Framework Plan (IMLUF) and acknowledges the consultation that has been undertaken to date.

This submission seeks to reaffirm the City of Melbourne's feedback to Department of Environment, Land, Water and Planning (DELWP) across the previous consultation phases where comment was sought on a series of Power Point presentations which highlighted the main points of the IMLUF, as well as provide a formal response to the IMLUF through this consultation process.

1.1. Submission Structure

This submission is structured as per the six key themes of the IMLUF:

- Productivity
- Housing Choice
- Integrated Transport
- Liveability
- Strong Communities
- Sustainability and Resilience

The City of Melbourne has provided an overview of key considerations within each theme and in turn has assessed each of the Directions, Strategies and Actions to elaborate on its position based upon existing Council policy.

Specific feedback has been categorised as follows:

Response	Definition
Supported	The initiative is supported as is by the City of Melbourne
Support in Principle – Clarification required	Clarification is required but City of Melbourne is supportive overall of the initiative.
Support in Principle - Subject to addressing comments	Substantive revision is required to support this initiative.
Not Supported	City of Melbourne does not support this initiative as it is contrary to its established position.

Table 1-1 Definition of City of Melbourne responses

General feedback, which is not exclusively specific to the individual themes, is included within the section of the submission.

1.2. Referenced Policies

The following City of Melbourne policies and documents have formed the basis of this submission:

- Council Plan 2021-2025
- Community Vision 2021-2031
- Green our City Strategic Action Plan 2017-2021
- COVID-19 Reaction and Recovery Plan 2020
- Greenline Implementation Plan 2021
- Municipal Integrated Water Management Plan 2017
- Maribyrnong Waterfront: A way forward 2020
- Yarra River – Birrarung Strategy 2019
- Arts Infrastructure Framework 2016-2021

- Economic Development Strategy 2031
- Open Space Strategy 2012
- Transport Strategy 2030
- Affordable Housing Strategy 2030
- Creative Strategy 2018-2028
- Climate Change Adaptation Strategy Refresh 2017
- Heritage Strategy 2013
- Urban Forest Strategy 2012-2032
- Submission to Infrastructure Victoria's Infrastructure Strategy 2021-2051

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

2. General Considerations

This section provides an overview of general comments provided by the City of Melbourne that are not specific to the individual themes, but relate to the overall context of the IMLUFP.

2.1. Clarification of scope

The City of Melbourne is unclear on the processes following potential Ministerial approval in Stage 6 of the IMLUFP timeline and the level of future consultation that will occur.

The City of Melbourne therefore requests consultation on any planning scheme amendment that may result from the IMLUFP.

2.1. Maps and Precincts

The City of Melbourne is particularly concerned over inaccuracies evident within the precinct maps, including the Parkville NEIC which appears to encompass open space such as Royal Park. In addition, the boundaries of the Macaulay renewal precinct differ to City of Melbourne boundaries for the precinct.

Map 2: Inner Metro Region productivity 2050

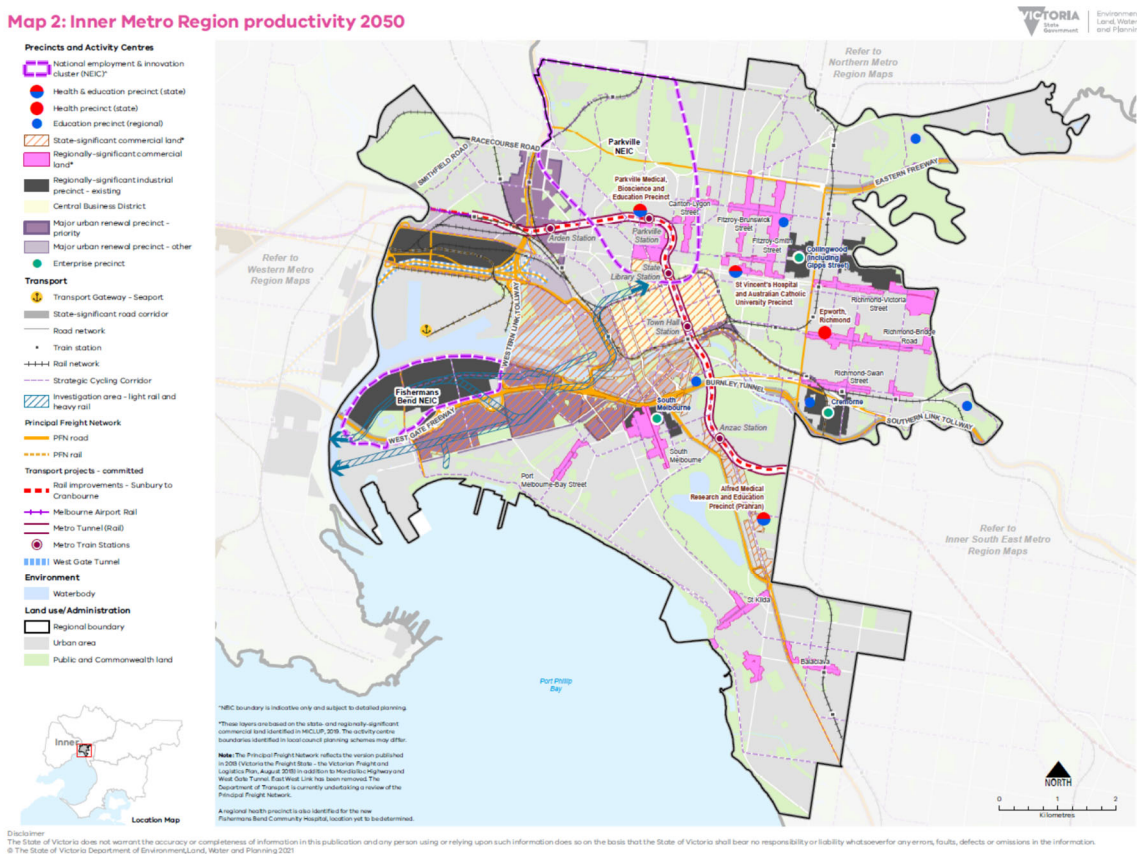


Figure 2-1 Precinct maps as IMLUFP

Given that the IMLUFP will form the basis of an amendment to introduce a Regional section into the planning schemes of the affected Councils, it is essential that all maps are accurate.

The City of Melbourne also requests specific precinct boundaries within mapping, rather than indicative areas.

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

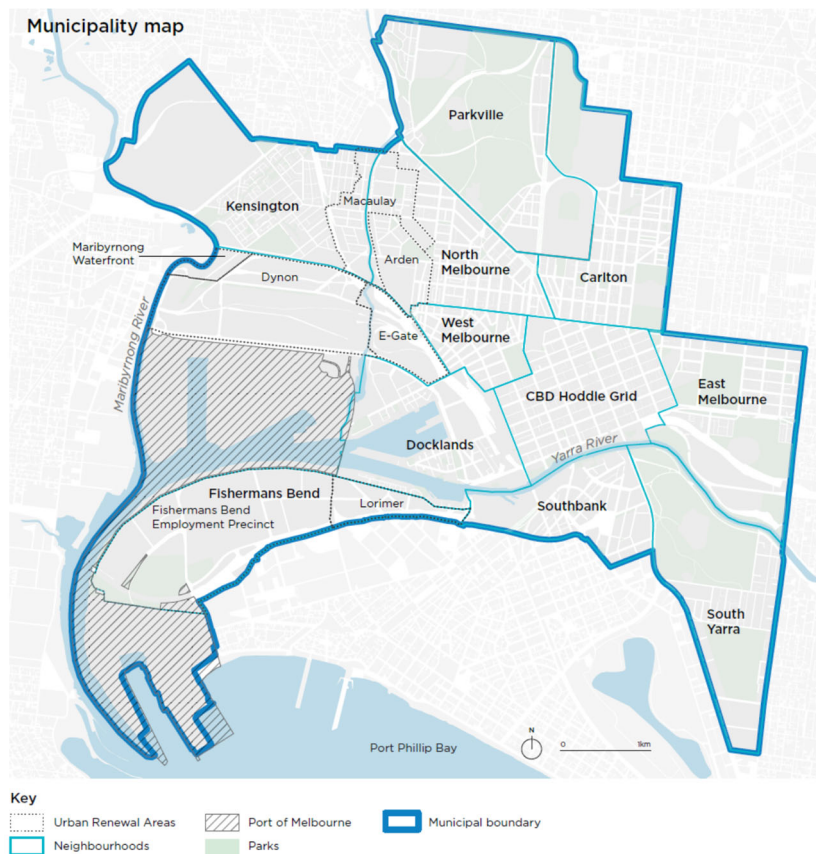


Figure 2-2 City of Melbourne municipality map with precincts identified

Clarification of precincts is also required, given that St Kilda Road in the City of Melbourne is not a renewal precinct. The distinctions between Southbank and Fishermans Bend also need to be maintained. Macaulay is a City of Melbourne led project, and is not led by the Victorian Government.

The City of Melbourne currently lacks suitable information on the Docklands to Richmond renewal precinct, despite its inclusion within the IMLUPF. Given the potential impact of this precinct it is imperative City of Melbourne is informed on the land use planning for this precinct.

The City of Melbourne requests the following modifications:

- Removal of Royal Park from the Parkville NEIC
- Corrections to the boundary of Macaulay
- Further information on the Docklands to Richmond renewal precinct
- Specific precinct boundaries within mapping, rather than indicative areas

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

2.1. Variability with Forecasts

The effects of COVID-19 will reshape the Inner Metro Region, as well as Victoria more broadly.

Prior to COVID-19, Melbourne's Central City had a daytime population of nearly a million people and contributed \$104 billion to Gross Local Product. In September 2020 Council endorsed the Covid-19 Reactivation and Recovery Plan identifies four key phases in the aftermath of COVID-19.

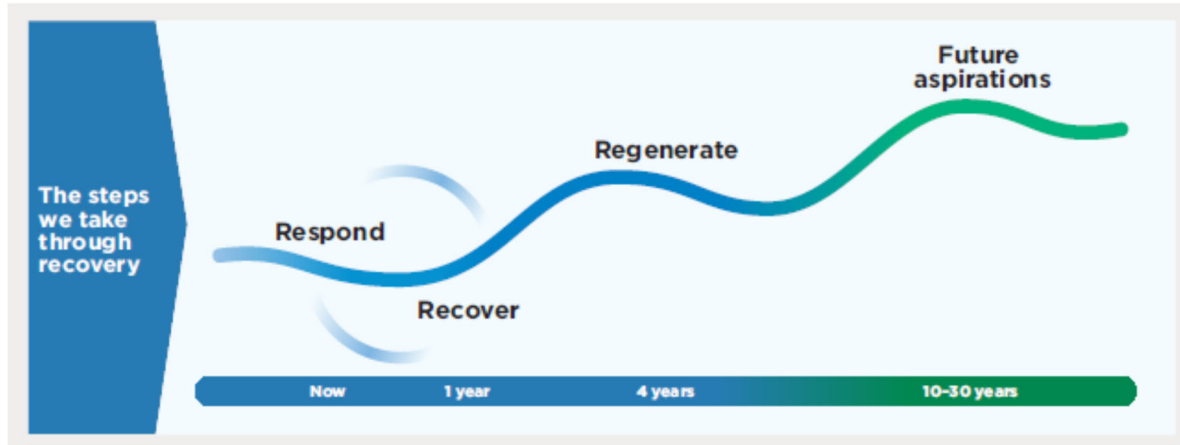


Figure 2-3 City of Melbourne COVID-19 Reactivation and Recovery phases

COVID-19 has altered behaviours in housing preferences, as well as work through work from home arrangements. Currently, the magnitude and permanency of these behavioural changes is unclear in terms of impact over the next 30 years.

There is a relatively high level of uncertainty around the accuracy of forecasts and interconnected trends. The City of Melbourne, therefore suggests that DELWP periodically revise forecasts to ensure the IMLUPF accurately reflects relevant conditions.

This document uses population forecasts from 2019. Since that time, due to COVID-19 there has been a profound impact on Victoria's population growth. Without taking this into account, the analysis of activity centres and housing provision is flawed.

COVID-19 has seen Victoria's population actually reduce. This would have been seen as unprecedented prior to the closure of the borders. An event like this must to be taken into account when planning for Melbourne's future.

Population forecasts have a direct impact on housing targets, impacting the accuracy of information used to inform the IMLUPF. The City of Melbourne requests further clarification on population targets and an understanding of the inputs used to inform this data. Clarification on how population targets were assigned to the different regions and how within the Inner Melbourne Region targets were assigned to each Council.

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

2.2. United Nations Sustainable Development Goals

The City of Melbourne supports the United Nations Sustainable Development Goals (SDGs) given that more than half of the world's population now lives in cities. It is currently unclear whether the SDGs have been considered in the context of the IMLUFP.

Urban dwellers account for a disproportionate share of economic production, consumption, and associated waste.

The 17 Sustainable Development Goals



Figure 2-4 United Nations Sustainable Development Goals (SDGs)

Implementation of the 2030 Agenda within urban areas is critical the success of the SDGs and should be considered appropriately as DELWP finalises the IMLUFP.

2.3. Implementation Schedule

The IMLUFP provides a 30-year vision of Melbourne's land use, yet the implementation schedule covers just the first five years of this timeframe. Identifying longer-term actions will assist in realising the ongoing vision presented through the IMLUFP and provide certainty for the final plan.

A detailed implementation plan covering the lifecycle of the IMLUFP will also provide a greater degree of certainty for local government in considering DELWP and Victorian Government priorities.

The City of Melbourne would welcome the opportunity to work with DELWP to determine suitable implementation timelines for longer term objectives within the IMLUFP.

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

3. Productivity Theme

The City of Melbourne and in particular the Hoddle Grid, Southbank, Docklands and Fishermans Bend, is a significant contributor to the economy of Metropolitan Melbourne and Victoria as a whole.

In 2019 the City of Melbourne contributed \$104 billion in Gross Local Product and is forecast to contribute \$150 billion by 2031. As such, the City of Melbourne contributes 88% of the Gross Regional Product, equating to 31% of Metropolitan Melbourne's economy and the most sizeable component of the 35% contribution to Gross State Product shared across the Inner Metro Region.

It is therefore important that the significance of the City of Melbourne's contribution to productivity is sufficiently recognised and supported.

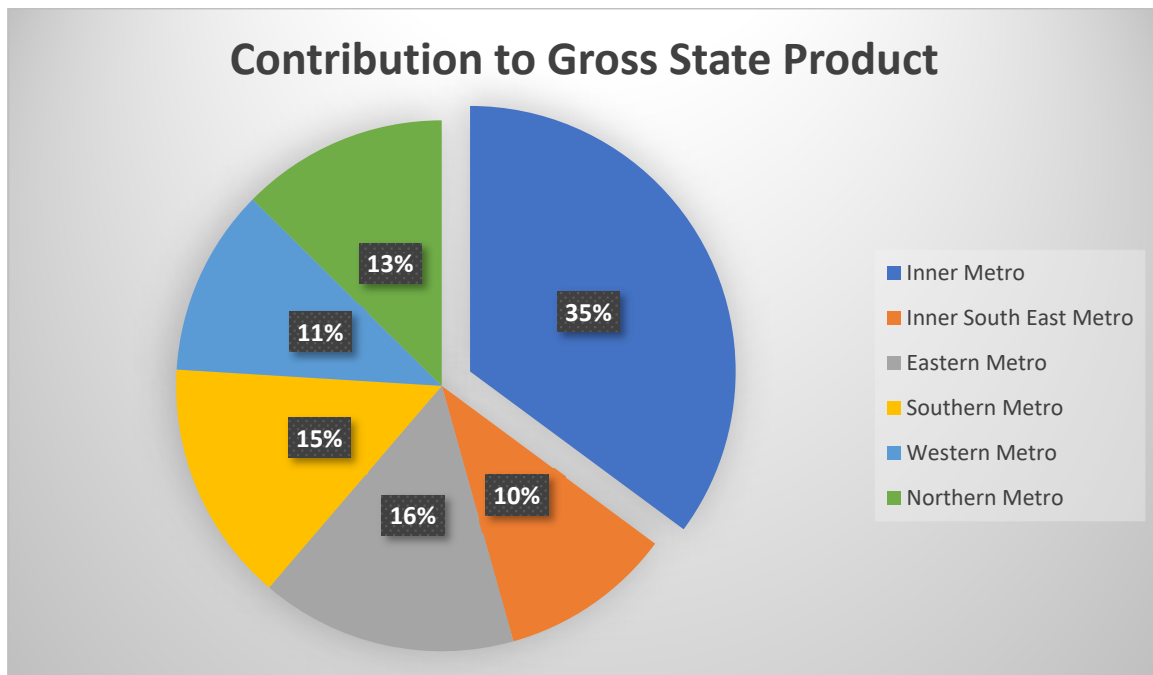


Figure 3-1 Contribution to Gross State Product by Region

While the vision statement adequately identifies the importance of the Central City as a 'principal centre for commerce, professional, business and financial services', the statement should be expanded to recognise the network of innovation and enterprise precincts with sector specialisations, as well as activity centres and high streets providing local services and jobs, and contributing to Inner Melbourne's distinctive character.

The productivity theme also needs to recognise the role of active and sustainable transport in supporting vibrant employment precincts and catalysing change. For example, the Fishermans Bend NEIC lacks public transport connectivity, which impacts the level of access from across Metropolitan Melbourne to employment within this precinct.

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

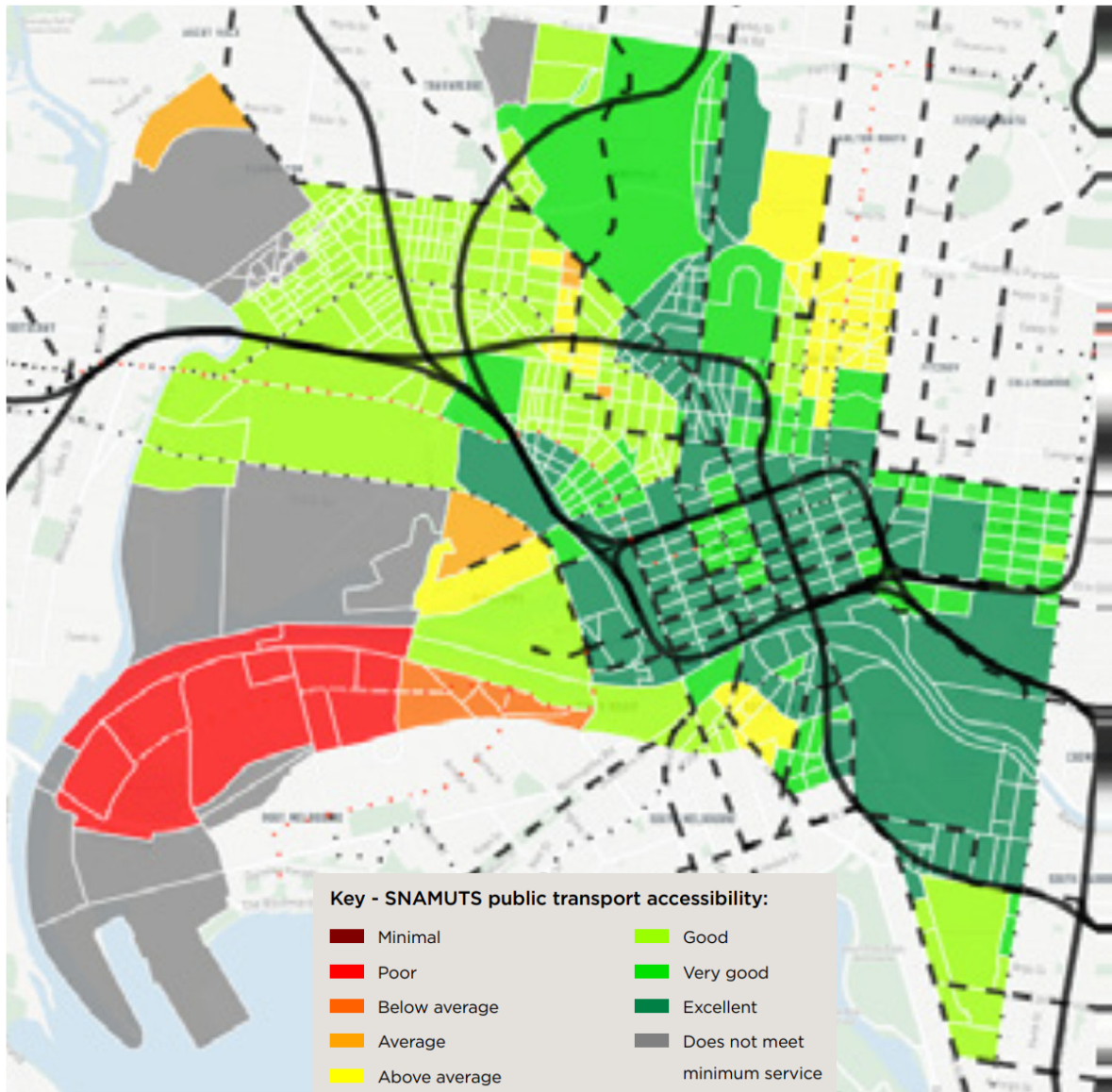


Figure 3-2 City Analytics and Spatial Network Analysis for Multimodal Urban Transport Systems

The role of sustainable transport is particularly important in the Inner Metro region.

As demonstrated in Figure 2-2, Fishermans Bend currently lacks suitable provisioning of public transport infrastructure, which in turn will impact its growth and renewal potential. Given that the Fishermans Bend Employment precinct is of State significance and serves a catchment from across Metropolitan Melbourne, provision of heavy and light rail for the precinct should be a priority action in the Framework Plan.

The need for public transport infrastructure for Fishermans Bend was recognised through Infrastructure Victoria's Strategy 2021 – 2051, which supported the City of Melbourne's view of immediate tram extensions into Fishermans Bend and for planning of Melbourne Metro 2 to commence.

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

3.1. Review of Directions, Strategies and Actions

Productivity underpins Plan Melbourne Outcome 1: Melbourne is a productive city that attracts investment, supports innovation and creates jobs.

Overall, the City of Melbourne is supportive of the strategies, actions and directions in this theme, but notes several areas where comments need to be addressed.

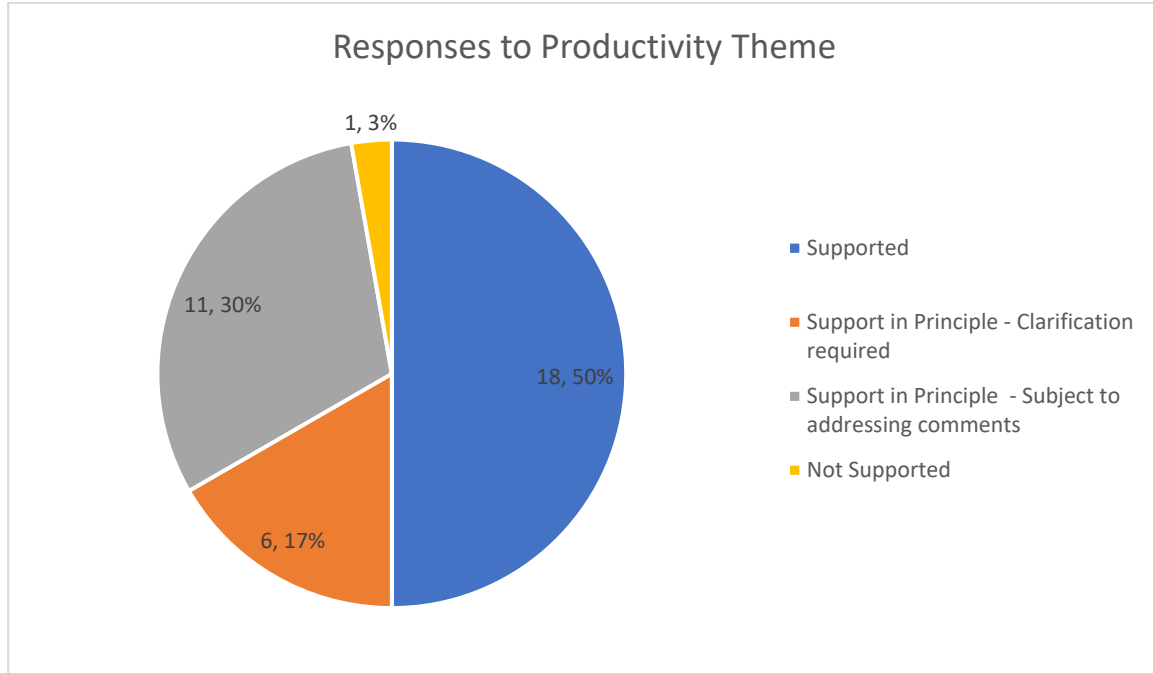


Figure 3-3 Summary of City of Melbourne responses to Productivity Theme

Specific feedback on the directions, strategies and actions includes:

Draft Framework Strategy/Action	Comments from City of Melbourne	City of Melbourne Position
Direction 1: Support the Central City to become the pre-eminent and largest commercial centre in Australia by 2050	Supporting discussion should recognise the role of the walking economy in the central city, with the need to plan and prioritise space for active transport. Reactivating the Hoddle Grid and Central City will be critical in supporting recovery from COVID-19.	Support in Principle – Subject to addressing comments
Strategy 1: Improve land use arrangements, amenities, public transport and sustainable transport connectivity in the Central City to support agglomeration and productivity benefits for the knowledge and services sectors	The strategy is vague and attempts to cover a broad remit of land use, amenity, transport and connectivity. It is not clear what is meant by “improve land use arrangements” and therefore whether this can be supported. There is merit in separating each of these aspects into separate strategies to fully support their intent.	Support in Principle – Subject to addressing comments

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

Strategy 2: Strengthen connections to destinations around the Central City, including major activity centres, major urban renewal precincts and health and/or education precincts, to support the success of the Central City.	This strategy should explicitly identify tram and rail connections to Fishermans Bend as a priority. In addition, it should also emphasis the role of walking and cycling as the most effective mode of transport within the Central City.	Support in Principle – Subject to addressing comments
Strategy 3: Provide affordable and diverse workspaces to build an innovative and resilient Central City.	Consistent with City of Melbourne position. However no mechanism is offered to demonstrate how this can be achieved.	Supported
Strategy 4: Balance planning for industrial and commercial areas with pressure for ongoing residential development.	Local government is best placed to understand the needs of its community and balance planning outcomes across commercial, industrial and residential needs.	Support in Principle – Clarification required
Direction 2: Strengthen the Inner Metro Region as a local and international destination for sport, arts, culture and entertainment to attract investment and visitors	Consistent with City of Melbourne position.	Supported
Strategy 5: Grow the visitor economy, night-time economy, sport and entertainment uses, and uses in the creative sector that contribute to local and international tourism in the Inner Metro Region.	Consistent with City of Melbourne position.	Supported
Strategy 6: Retain existing entertainment and cultural activity spaces in the region and encourage a diversity of complementary uses to ensure the provision of	There is a need to not only retain, but also increase entertainment and cultural activity spaces, where possible. Live music is now recognised within the Planning Policy Framework (Clause 13.07 3S)	Support in Principle - Subject to addressing comments

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

venues serve industry and community needs.	which means there is merit in explicitly recognising live music within this strategy.	
Strategy 7: Provide affordable spaces for cultural production and performance to support the local creative and cultural industry and to attract and host international touring creatives.	Consistent with City of Melbourne position. However no mechanism is offered to demonstrate how this can be achieved.	Supported
Direction 3: Facilitate the development of the Parkville and Fishermans Bend NEICs as major economic contributors for the regional and national economy supported by increased transport connectivity	Fishermans Bend needs to reference the University of Melbourne campus and to note that the light and heavy rail is critical to catalyse change.	Supported in Principle – Clarification required
Strategy 8: Strengthen Parkville NEIC as Melbourne’s premier location for biomedical, education, health, research, professional and technical industries in the Inner Metro Region.	The City of Melbourne suggests addressing the poor public realm experience, and significant amount of heritage protection in the area. The area also supports a significant startup sector and NGO sector clustered around the Lygon Street area.	Support in Principle – Subject to addressing comments
Strategy 9: Prioritise Parkville NEIC’s main role for economic, education and research activities, and ensure residential uses do not compromise its primary function. Residential development should be associated with and benefit the institutions in the NEIC.	The Parkville NEIC is the premier Australian destination for international students and is characterised by a high density of student accommodation. To an extent this development has already crowded out valuable commercial and industry floorspace. Further residential development needs to be considered in relation to the floorspace needs of innovation uses.	Support in Principle – Subject to addressing comments

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

Strategy 10: Develop the Fishermans Bend NEIC as a leading location for innovation in design, engineering and advanced manufacturing.	Consistent with City of Melbourne position.	Supported
Strategy 11: Protect land in the Fishermans Bend NEIC for advanced manufacturing and industrial uses.	Consistent with City of Melbourne position.	Supported
Strategy 12: Provide public transport connections to Fishermans Bend NEIC (and major urban renewal precinct) to support investment and support future employment and population needs.	Consistent with City of Melbourne position. As stated above, public transport connections need to be prioritised.	Supported
Direction 4: Enhance the Inner Metro Region's vibrant and diverse activity centres and their contribution to the identity of the region	Consistent with City of Melbourne position.	Supported
Strategy 13: Ensure the region's activity centres provide adequate jobs, services and opportunities for recreation and entertainment to service workers and visitors from across metropolitan Melbourne.	Consistent with City of Melbourne position.	Supported
Strategy 14: Retain existing commercial zoned land and identify areas that can support future demand for commercial floorspace and new investment with a focus on major activity	There is very little commercial zoned land in the City of Melbourne where other zones such as the Capital City Zone, Dockland Zone and Special Use Zone provide opportunities for commercial development. It is agreed that land for commercial development needs to be retained.	Supported in Principle – subject to addressing comments

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

centres and major urban renewal areas.	<p>There is a need to review planning mechanisms available to facilitate and manage the delivery of commercial floorspace and ensure a balance with residential uses.</p> <p>Currently MUZ and CZ1 are not effective or fit for purpose, resulting in the use of SUZ zoning.</p>	
<p>Strategy 15: Encourage a diversity of employment uses in major activity centres and facilitate the provision of key services to complement other employment precincts within the Inner Metro Region.</p>	Consistent with City of Melbourne position.	Supported
<p>Direction 5: Retain existing and support emerging employment areas, including industrial and enterprise precincts, across the Inner Metro Region</p>	<p>The text should address the changing nature of industrial land uses, including shifts in typologies (e.g. ecommerce, data warehouses.) It is also important to retain service industry within the Inner Region.</p> <p>The current description of Arden is incorrect, given the vision for this precinct is an innovation precinct which will provide floorspace for health, life science, education and technology.</p>	Support in Principle - Subject to addressing comments
<p>Strategy 16: Support the development of enterprise precincts in Cremorne, South Melbourne, Arden and Collingwood and encourage their continued development as key locations for creative industry uses.</p>	<p>Clarification of this strategy is required regarding the difference between enterprise precincts, precincts for advanced manufacturing and industrial uses (Fishermans Bend) and precincts for biomedical, education, health, research, professional and technical industries (Parkville).</p> <p>Arden has been earmarked for a diverse range of uses, not just creative industries.</p> <p>Furthermore, this strategy does not include Fishermans Bend, despite existing work also supporting enterprise and creative industries.</p>	Support in Principle – Subject to addressing comments
Strategy 17:	Consistent with City of Melbourne position.	Supported

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

Maintain a variety of uses and lot sizes in enterprise precincts to retain commercial affordability for start-ups and small businesses and ensure the agglomeration of complementary uses.	See comment under Strategy 16 above	
Strategy 18: Retain regionally-significant industrial land by managing encroachment by other uses that would cause fragmentation and may compromise the development and efficient operation of existing businesses.	It is uncertain whether this implies that industrial areas not identified in this strategy should not be retained. Further investigation is needed to determine the future of industrial floorspace needs.	Support in Principle - Clarification required
Strategy 19: Identify and plan for areas that can support future demand for employment uses and new investment.	Consistent with City of Melbourne position.	Supported
Direction 6: Facilitate well-designed, high-amenity and quality medium- and higher-density environments in major urban renewal precincts to provide employment growth	Consistent with City of Melbourne position.	Supported
Strategy 20: Support employment uses in Arden that complement adjacent and nearby employment uses, including the Parkville NEIC.	Consistent with City of Melbourne position, noting earlier comments on employment use within the Arden and Parkville NEICs.	Supported
Strategy 21: Encourage development that is consistent with the specialised	Consistent with City of Melbourne position noting earlier comments on employment use within Fishermans Bend.	Supported

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

employment role of Fishermans Bend Urban Renewal Area and Arden major urban renewal precinct		
Strategy 22: Maintain the current industrial roles of Dynon and E-Gate major urban renewal precincts while recognising their longer-term urban renewal opportunities.	Extensive investigation of Dynon and E-Gate needs to be undertaken before any urban renewal opportunities can be recognised. Need to explore the significant inundation challenges associated with Dynon and E-Gate and to assess the ongoing role and need for current uses.	Not Supported – Clarification required
Strategy 23: Ensure the mixed-use precincts within the Fishermans Bend Urban Renewal Area provide adequate land for employment purposes which complement or service the adjacent Fishermans Bend NEIC.	Consistent with City of Melbourne position. See Strategy 14 above.	Supported
Strategy 24: Deliver a high-quality public realm and urban design in major urban renewal precincts, and through the region's employment precincts including activity centres and enterprise precincts	High quality public realm should be delivered everywhere and not confined to specific types of areas.	Support in Principle – Clarification required
Direction 7: The Port of Melbourne will continue to be a nationally significant distribution and transport gateway	There is the potential for conflict between this direction and the Fishermans Bend renewal area.	Support in Principle – Clarification required
Strategy 25: Protect the critical operations of the Port of Melbourne and freight movements from the encroachment of surrounding incompatible land uses.	The proposed alignment of the port freight rail link is not shown. The preferred route needs to be the one that minimises the impact on Lorimer, Westgate Park, Moonee Ponds Creek, Sandridge Beach and the Yarra River. The link also needs to be acoustically treated so that it does not undermine the amenity of nearby residential development.	Support in Principle - Subject to addressing comments

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

Strategy 26: Balance freight movement with the need to protect the amenity of the Fishermans Bend Urban Renewal Area.	As mentioned, there is potential for conflict between Fishermans Bend and freight movement from the Port of Melbourne which will need to be well managed. See Strategy25 above.	Supported
Strategy 27: Support increased freight movements on rail.	Consistent with City of Melbourne position. See Strategy 25 above.	Supported
Actions		
Action 1: Identify precincts and opportunities where new commercial land can be supplied which can help to accommodate future needs. This may include intensification of commercial uses within existing commercial zoned land, or the rezoning of existing land for commercial uses.	Except for the low rise residential areas, the concept of single use areas is outdated and does not fit with the reality of development in the inner region as discussed above.	Not Supported
Action 2: Implement a program of State Government-led planning projects, in partnership with local government, to ensure metropolitan and major activity centres and urban renewal areas maximise their respective strategic opportunities and contribution within the network of activity centres. Priority will be given to those which deliver significant jobs and housing, leverage investment in state infrastructure, and play an important role in the growth corridor and/or	This action is too vague to understand what is meant by 'State Government-led planning projects'. It is also not clear what is meant by 'maximise their respective strategic opportunities'. The Inner Region Councils understand and are best able to plan for their regional catchments and local communities including opportunities for delivering more jobs. They are also able to determine if or when State intervention is required. See comments above regarding the need for a zone that will enable Councils to deliver jobs.	Not supported

<p>region. State-led planning for these state- and regionally-significant places will contribute to creating liveable communities and achieving more dwellings and jobs in established areas, and identify implementation and coordination actions that support growth and economic investment.</p>		
---	--	--

Table 3-1 Comments on Directions, Strategies and Actions for Productivity Theme

The City of Melbourne notes the comments above and welcomes further opportunity to clarify its position if required.

3.2. Additional Considerations

In addition to the above feedback, the City of Melbourne advises on the following modifications.

The challenges facing Docklands should be acknowledged within the IMLUFP. The redevelopment of Central Pier and Harbour Esplanade is a five-year proposition as well as further commercial development opportunities outlined in City to Waterfront Blueprint. The loss of Melbourne Star highlights the need for a longer term planning solution to ensure the commercial success of Docklands is not lost and it is supported by a sustainable mix of other uses.

Table 6 (Major activity centres: existing attributes and strategic opportunities), it is suggested that the strength of opportunity of NGO sector presence is included to Carlton and Lygon Street. Adding these attributes also leverages off the Parkville NEIC and RMIT University plans for its Social Innovation Hub.

The Melbourne Innovation District, should be mentioned given it is a significant attractor of both international students and the startup community.

There is insufficient discussion on the contribution of international students, education services, and research, to the Victorian economy. The sector has significant potential and requires rejuvenation following the impacts of COVID-19.

Lastly, the City of Melbourne suggests further discussion on the role of infrastructure and the digital economy, given the acceleration of digitalisation following COVID-19.

CITY OF MELBOURNE

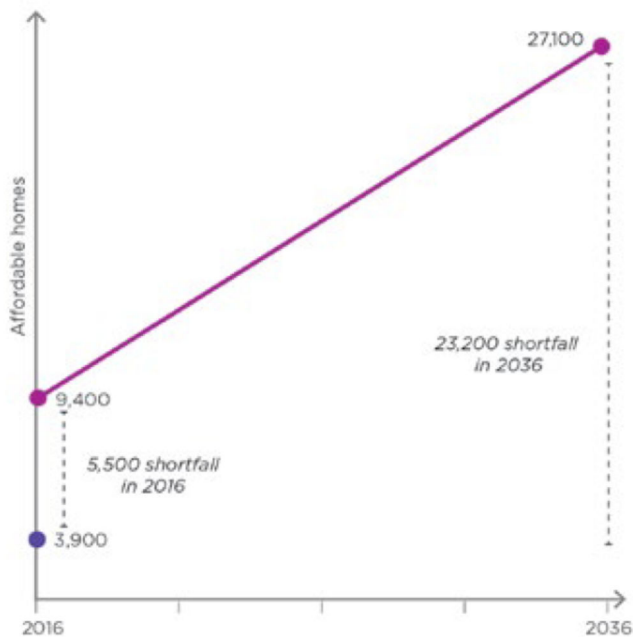
Draft Inner Metro Land Use Framework Plan Submission

4. Housing Choice Theme

The City of Melbourne supports the intent to provide housing choice in locations close to jobs and services and notes that the Inner Metro Region has significant strengths in this regard.

Issues remain, however, over the lack of suitable housing choice and affordability, which not only undermines inclusion, but also hampers the ability of key workers, such as nurses, hospital and service industry staff to reside close to their workplaces.

The City of Melbourne has identified a shortfall in affordable housing, which is currently forecast to grow to 23,200 if significant action is not taken. Current policy announcements, such as the Big Housing Build, will need sustained investment to provide a significant impact on affordable housing supply.



Key

- Need for homes for people experiencing housing stress
- Existing supply of affordable housing

Figure 4-1 City of Melbourne Affordable Housing Shortfall

Increasing the provision of affordable housing will provide a community benefit, as measured through reductions in crime and family violence, as well as benefits in health and education. Furthermore, it will lead to an increase in human capital, including the retention of key workers within industries critical to the ongoing success of Melbourne and Victoria.

Research commissioned by the City of Melbourne has identified \$3 worth of community benefit for every dollar invested in affordable housing.

SGS Economics and Planning, 2019

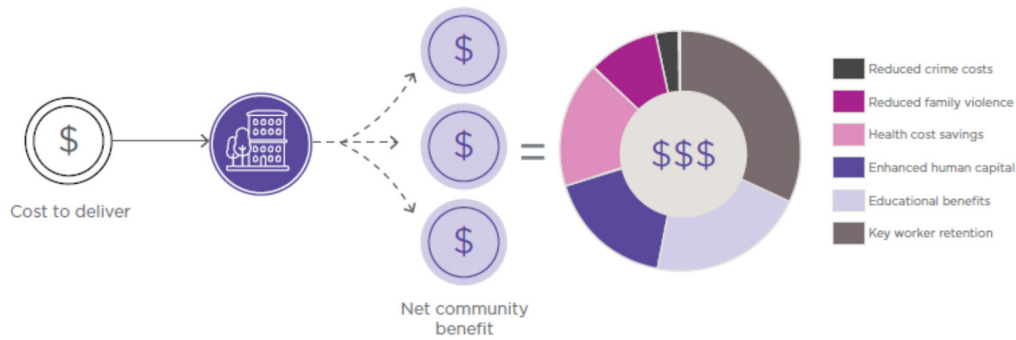


Figure 4-2 Net benefit from community housing

4.1. Review of Directions, Strategies and Actions

Housing Choice underpins Plan Melbourne Outcome 2: Melbourne provides housing choice in locations close to jobs and services.

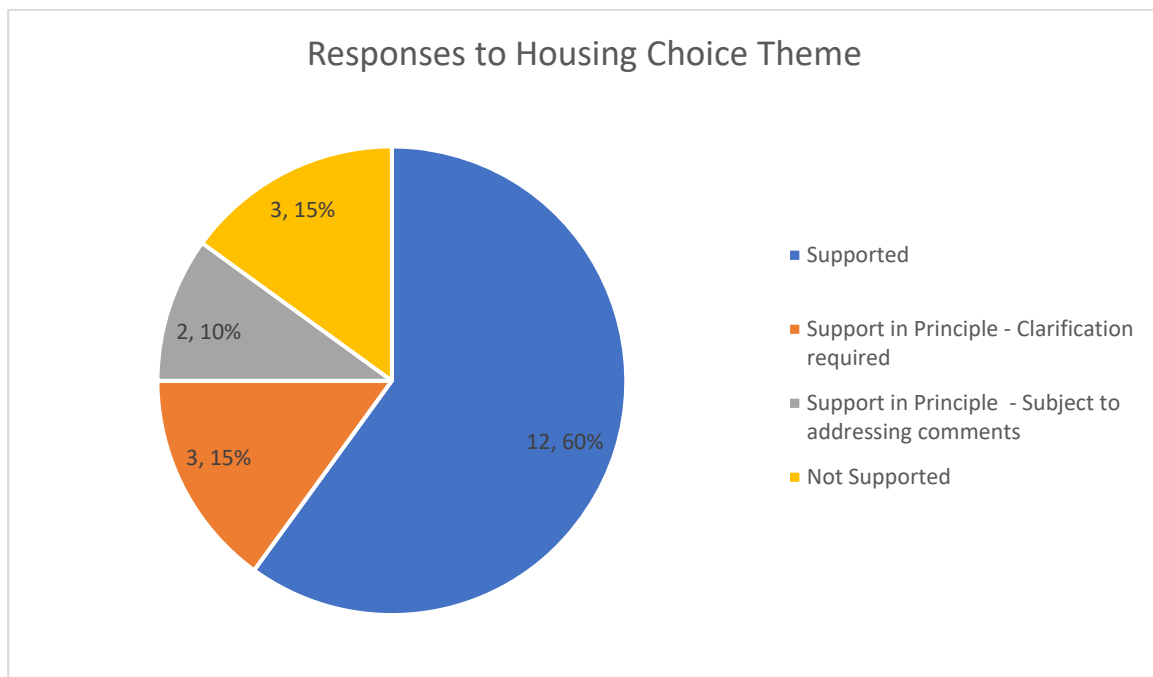


Figure 4-3 Summary of City of Melbourne responses to Housing Choice Theme

Overall, the City of Melbourne supports this outcome, noting further comments on each of the directions, strategies and actions as follows:

Draft Framework Strategy/Action	Comments from City of Melbourne	City of Melbourne Position
Direction 8: Increase the supply of housing in the Inner Metro Region and ensure housing	Consistent with City of Melbourne position.	Supported

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

matches the needs of the growing and changing population		
<p>Strategy 28: Maximize housing development within the established areas of the Inner Metro Region to achieve the aspirational housing distribution scenario for metropolitan Melbourne.</p>	<p>City of Melbourne takes exception to the word 'maximize' as this may be contrary to many other factors which are important including a comfortable, walkable public realm, overshadowing, wind, internal amenity and so on. It is also considered that all of metropolitan Melbourne needs to accommodate its equitable share of housing growth.</p> <p>The following is not clear:</p> <ul style="list-style-type: none"> • Was the provision of housing distributed across the metropolitan area in an equitable manner? • Was the provision of housing distributed within the Inner Region in an equitable manner? <p>Furthermore, protections such as Heritage Overlays and local context and character warrant consideration.</p>	<p>Not Supported</p>
<p>Strategy 29: Encourage high-density housing in the Central City while supporting its commercial role through genuine mixed-use developments.</p>	<p>There is need to clarify definitions of high-density housing.</p> <p>At present, no controls are placed on minimum levels of non-residential development in most zones applied to the Central City. See comments above.</p>	<p>Support in Principle – Subject to addressing comments</p>
<p>Strategy 30: Increase the supply of medium and higher-density housing in appropriate locations in major activity centres, major urban renewal precincts, urban renewal areas, and in neighbourhood activity centres along tram corridors and serviced by good public transport.</p>	<p>See comments in Strategy 28 above.</p>	<p>Support in Principle – Clarification required</p>

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

<p>Strategy 31: Balance employment uses with residential uses in major urban renewal precincts, major activity centres and large mixed-use developments to achieve a genuine mix of uses in locations identified for both employment uses and medium- and higher density housing.</p>	<p>Consistent with City of Melbourne, but notes that planning mechanisms are required to achieve 'genuine mixed-use developments' as discussed above.</p>	<p>Support in Principle – Subject to addressing comments</p>
<p>Strategy 32: Support adaptive and innovative approaches in the design of new residential development that respects the heritage and neighbourhood character of the locality.</p>	<p>No content of the Direction elaborates on what is meant by 'innovative approaches in the design of new residential development'.</p> <p>All development not only residential development needs to respect the heritage and neighbourhood character of its locality.</p> <p>The City of Melbourne requires further guidance to clarify this strategy.</p>	<p>Support in Principle - Subject to addressing comments</p>
<p>Direction 9: Provide greater choice and diversity of housing in the Inner Metro Region</p>	<p>Consistent with City of Melbourne position.</p>	<p>Supported</p>
<p>Strategy 33: Encourage a genuine mix of dwelling types and sizes in the Inner Metro Region, including providing larger dwellings suitable for families and shared households in apartment developments, to accommodate the changing future needs of the region.</p>	<p>Consistent with City of Melbourne position.</p>	<p>Supported</p>
<p>Strategy 34: Support alternative and sustainable residential development formats such as co-housing or build-to-rent in</p>	<p>Consistent with City of Melbourne position.</p>	<p>Supported</p>

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

appropriate locations, and car free residential development models in locations with good access to alternative transport modes.		
Strategy 35: Facilitate the development of housing that is adaptable and flexible to cater for changing demographics and can accommodate different household types and configurations over the building's lifetime.	Consistent with City of Melbourne position.	Supported
Strategy 36: Optimise the opportunities for student accommodation and key worker housing within or close to Carlton-Lygon Street, Fitzroy- Smith Street, and Richmond- Bridge Road major activity centres and around health and/or education precincts in the Inner Metro Region.	<p>This strategy has the potential to be in conflict with other City of Melbourne strategies and is not supported.</p> <p>Why is the location of key worker housing, linked to the location of student housing?</p> <p>Student housing should be located where there is good access to education precincts. Its location in education precincts needs to be balanced with the other needs of such precincts, such as innovation uses.</p> <p>Key worker housing should be located where there is good access to jobs by public transport.</p>	Not Supported
Strategy 37: Ensure new residential development is well designed, durable, resilient to climate change and built to a high-quality standard.	Design quality is not given enough status in this theme as it deserves its own Direction to include strategies about drafting strong controls to achieve good design.	Supported – Requires elevation as a distinct Direction.
Strategy 39: Adopt a place-based approach to the delivery of infill housing developments to replace ageing housing stock, ensure high-quality of design that is appropriate for the local	<p>This strategy relates to good contextual design which should apply across Inner Melbourne and to all types of development.</p> <p>There is a need to simplify this strategy as it is too broad in its current form.</p>	Support in Principle – Clarification required

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

context and contributes to housing supply and diversity.		
Direction 10: Increase the supply of social and affordable housing	Consistent with City of Melbourne position.	Supported
Strategy 40: Facilitate more affordable housing across the region, particularly in locations that have good access to jobs, services and public transport.	Consistent with City of Melbourne position.	Supported
Strategy 41: Support a regional approach to determining social and affordable housing needs.	Consistent with City of Melbourne position.	Supported
Strategy 42: Support the improvement and retention of existing social housing development within the Inner Metro Region.	Consistent with City of Melbourne position.	Supported
Actions		
Action 3: Update planning schemes to align with housing policies in Plan Melbourne and the Inner Metro Region Land Use Framework Plan and the implementation of the reformed residential zones. This includes providing capacity for 15 years of regional housing supply focusing on locations identified for housing growth in the LUFF. This may require strategic planning work to support these	Clarification is required. Current wording implies that City of Melbourne is being directed to update the Melbourne Planning Scheme to provide additional capacity for 15 years of housing supply. The City of Melbourne is providing the highest share of new housing across the region. See comments under Strategy 28 above.	Not Supported

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

changes such as preparing or updating local housing strategies or preparing structure plans to further investigate where increased densities can be supported, and determine specific changes required to planning schemes.		
Action 4: Identify underutilised and surplus government land that has the potential to deliver additional social housing.	City of Melbourne supports the State Government identifying State owned land suitable for social and affordable housing. A further action ensuring that the State provides housing on the land should be added.	Support in Principle - Clarification required
Action 5: In partnership with councils, identify a pipeline of sites in the Inner Metro Region for social and affordable housing.	See comments in Action 4 above.	Supported

Table 4-1 Comments on Directions, Strategies and Actions for Housing Choice Theme

The City of Melbourne reiterates that housing choice needs to include the full spectrum of social and affordable housing to foster the liveability of the Inner Metro region.

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

5. Integrated Transport Theme

Victoria’s economic prosperity is reliant on efficient transport networks, with the Central City being the centre of the state’s transport network.

The City of Melbourne recognises the importance of good precinct design and its role in improving connectivity, but also highlights that significant renewal precincts, such as Fishermans Bend, currently lack of suitable transport options.

The City of Melbourne supports an integrated transport network providing suitable public transport and active transport options as identified in Figure 4-1. The provision of tram extensions to Arden and Fishermans Bend, as well as Melbourne Metro 2, will support not only the provision of integrated transport, but the other themes identified across IMLUFP.

2030 PROPOSED INTEGRATED NETWORK

Melbourne’s transport network in 2030 as proposed by this strategy.

Key:	Existing	Proposed/future
Pedestrian-priority zone		
Protected bicycle route		
Slow zone for bikes		
Traffic-calmed bike street		
Train station		
Train station - investigate relocation		
Full-time bus priority		
Tram		
Rail		
Melbourne Metro 1 (Metro Tunnel)		
Melbourne Metro 2		
Traffic bypass		

Map 1: Combined map of all proposals

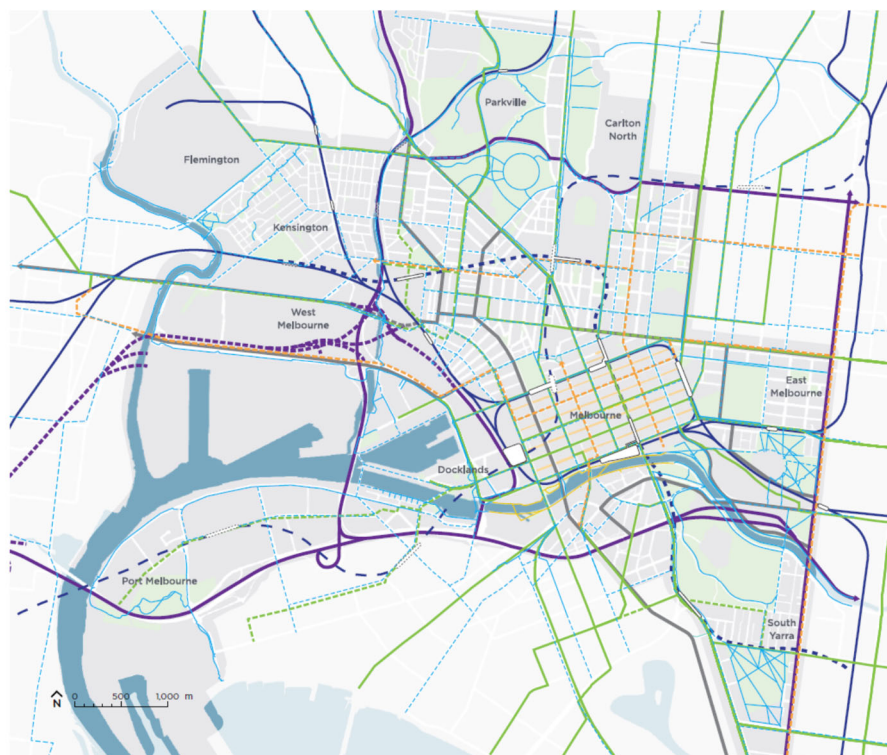


Figure 5-1 City of Melbourne 2030 Proposed Integrated Transport Network

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

5.1. Review of Directions, Strategies and Actions

Integrated Transport reflects Plan Melbourne Outcome 3: Melbourne has an integrated transport system that connects people to jobs and services and goods to market.

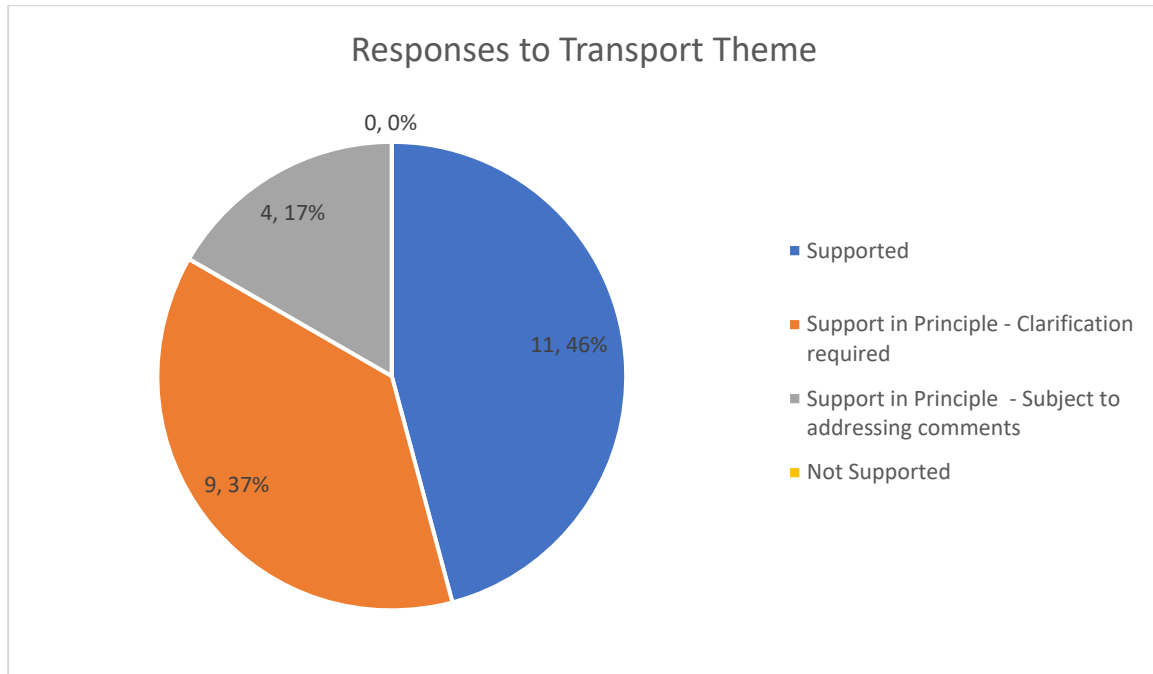


Figure 5-2 Summary of City of Melbourne responses to Transport Theme

The outcome is supported by City of Melbourne, noting commentary as follows on each of the directions, strategies and actions:

Draft Framework Strategy/Action	Comments from City of Melbourne	City of Melbourne Position
Direction 11: Improve transport connections to support the region's competitive advantage as the economic, cultural and services hub of metropolitan Melbourne and Victoria	Consistent with City of Melbourne position.	Supported
Strategy 43: Ensure major road and rail projects include public and active transport improvements and connections.	Consistent with City of Melbourne position.	Supported
Strategy 44: Improve public and active transport connections to, from	Consistent with City of Melbourne position.	Supported

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

and through the Inner Metro Region for work, education and leisure.		
Strategy 45: Improve public and active transport connections from the inner west of Melbourne to the CBD and Fishermans Bend.	Consistent with City of Melbourne position.	Supported
Strategy 46: Improve public and active transport connections across the Yarra River, orbitally within the region and between major activity centres and regionally-significant places.	Consistent with City of Melbourne position.	Supported
Strategy 47: Improve orbital movement corridors across the region.	City of Melbourne supports capturing the benefits of road projects to remove through-traffic from the Central City. Orbital improvements for public and active transport are also required and should not be dependent on new road projects.	Support in Principle – Clarification required
Strategy 48: Support cycling for transport through the development of Strategic Cycling Corridors in the Inner Metro Region.	This strategy should be strengthened to promote the continual improvement and expansion of the strategic cycling network. It must also be recognised that cycling takes place on almost all streets and roads and that active movement should not be deprioritised simply because the road segment is not designated as a 'strategic' connection.	Support in Principle – Subject to addressing comments
Strategy 49: Facilitate land use change to respond to access improvement delivered by major public transport projects.	This should also occur in reverse where new development or land use may alter the movement and place function of a road or street.	Support in Principle – Clarification required
Direction 12: Improve public and active transport access for the Parkville and Fishermans Bend NEICs	Consistent with City of Melbourne position.	Supported

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

and major urban renewal precincts		
Strategy 50: Design major urban renewal precincts with an urban form that prioritises sustainable transport use.	Minimum car parking requirements will need to be removed and design controls implemented to limit vehicle use and the number of crossovers. Bicycle parking requirements will also need to be strengthened. Bicycle parking has very minimal standards in the planning scheme at present	Support in Principle - Subject to addressing comments
Strategy 51: Support NEICs and major urban renewal precincts with early public transport investment.	Consistent with City of Melbourne position.	Supported
Strategy 52: Improve public and active transport connections to employment and enterprise precincts.	City of Melbourne notes that this strategy should also seek to dissuade unnecessary private vehicle use.	Support in Principle - Clarification required
Strategy 53: Provide high-quality public and active transport to job-rich areas including Parkville and Fishermans Bend NEICs, major urban renewal precincts and the major activity centres.	City of Melbourne notes that this strategy should also seek to dissuade unnecessary private vehicle use.	Supported
Direction 13: Improve active and public transport options to promote mode shift and support 20-minute neighbourhoods	Consistent with City of Melbourne position.	Supported
Strategy 54: Enhance public transport coverage, frequency and capacity, improving access to destinations across the network.	City of Melbourne seeks to include on-road lane and signals priority for public transport within this strategy.	Support in Principle – Subject to addressing comments
Strategy 55: Deliver a convenient, safe and attractive pedestrian network	Pedestrian network should have priority over other modes including at intersections and signals at other locations.	Support in Principle – Subject to addressing comments

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

connecting key destinations, and linking regionally-significant places and key cultural and sporting destinations.		
Strategy 56: Improve walking and cycling access to train stations to support medium- and higher-density housing outcomes.	Should also include improvements to bicycle parking at rail stations including central city stations. The reason for walking and cycling access to train stations should not be confined to supporting medium and higher density housing. Good access to stations is needed for access to work, shopping and entertainment and everything the Region has to offer.	Support in Principle – Clarification required
Strategy 57: Provide walking and cycling routes and drop-off zones to health and community services, and recreation facilities.	Mode hierarchy will be required where space is limited.	Support in Principle – Clarification required
Strategy 58: Plan for place in transport connector improvements.	The Strategy needs to be articulated more clearly. It is not clear why 'plan for place' applies specifically to transport connector improvements and not more broadly. Suggest 'plan for place in transport connector improvements, as well as implement of those plans' is included in the implementation plan.	Support in Principle – Clarification required
Direction 14: Plan for transport interchanges as destinations and places for movement	Consistent with City of Melbourne position	Supported
Strategy 59: Ensure the design of transport interchanges and corridors improves active travel, public areas and their functions, and contributes to a sense of place.	Consistent with City of Melbourne position	Supported
Strategy 60: Balance movement and place when designing	This strategy is not clear. Balance needs to be defined to ensure it holistically reflects transport needs.	Support in Principle – Clarification required

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

and upgrading the region's road network.		
Strategy 61: Design streets that provide for sustainable transport modes and improve the public realm.	Consistent with City of Melbourne position.	Supported
Actions		
Action 6: Apply the Movement and Place Framework to the Inner Metro Region's arterial road network and allocate priorities for transport connector improvements such as improving road space allocation for public and active transport, identify priority streets for walking and cycling, and road management and use arrangements. This should include a focus on transport interchanges and transport corridors.	City of Melbourne suggests that should apply to all streets and roads.	Support in Principle – Clarification required

Table 5-1 Comments on Directions, Strategies and Actions for Housing Choice Theme

The City of Melbourne remains supportive of efforts to encourage sustainable and active transport across the region.

5.1. Additional Considerations

The City of Melbourne seeks to clarify further details on Map 5 (Inner Metro Region integrated transport 2055).

The East West Link is included within Map 5 as part of the freight network. This is not supported. There is a need to clarify the status of this inclusion, given the untenable impact it will have on the City of Melbourne and that it has been previously rejected.

On Map 5 it is difficult to identify tram extensions to the Arden and Macaulay precincts as supported by Infrastructure Victoria and the City of Melbourne.

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

6. Liveability Theme

The City of Melbourne strongly supports efforts to enhance the liveability of the Inner Metro Region, noting the critical role that the region serves not only for its own communities, but also for people across the wider Metropolitan region.

6.1. Review of Directions, Strategies and Actions

Liveability supports Plan Melbourne Outcome 4: Melbourne is a distinctive and liveable city with quality design and amenity.

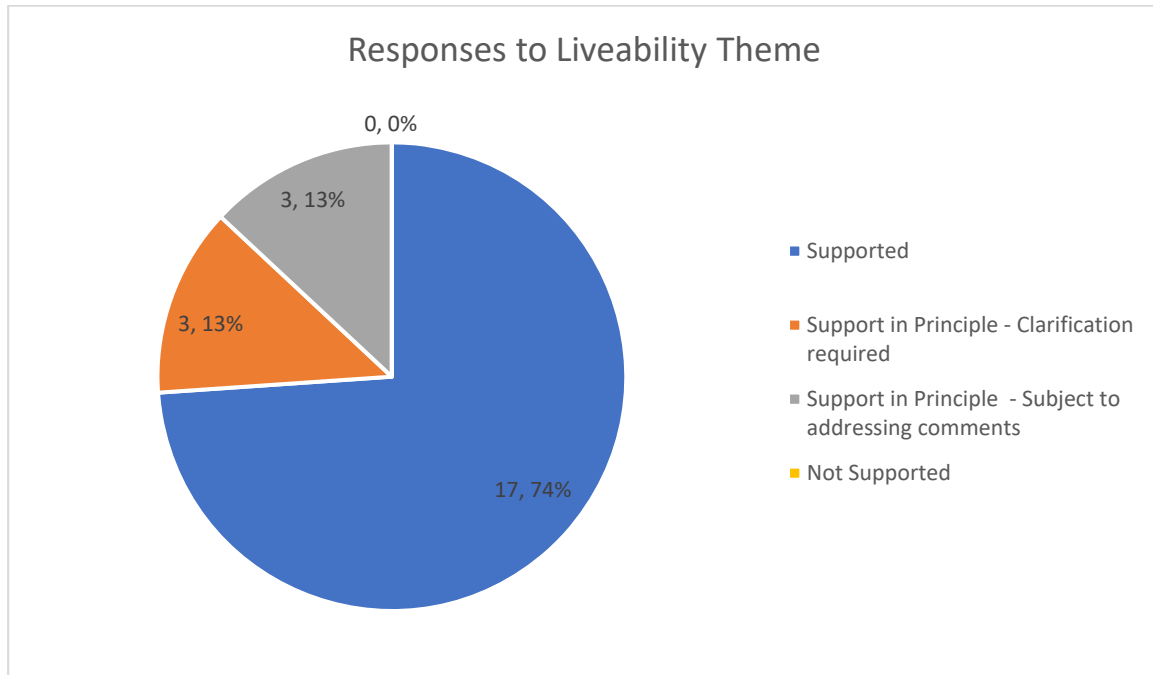


Figure 6-1 Summary of City of Melbourne responses to Liveability Theme

The City of Melbourne notes the following:

Draft Framework Strategy/Action	Comments from City of Melbourne	City of Melbourne Position
Direction 16: Draw on the region's culture and heritage to create a rich and layered urban environment and distinctive places	Consistent with City of Melbourne position.	Supported
Strategy 64: Engage with Aboriginal communities to incorporate cultural heritage, design and stories into built and natural environment.	Support – noting there is a need to engage with Traditional Owners and also other urban Aboriginal communities that live in these areas.	Support in Principle – Clarification required
Strategy 65:		Supported

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

Reflect the different eras, layers and aspects of the region's history in the design of contemporary buildings, public spaces, infrastructure and public artwork where appropriate.		
Strategy 66: Ensure the ongoing identification and protection of heritage places, precincts and streetscapes and support their adaptive re-use where appropriate, particularly for creative and cultural uses.	There needs to be greater emphasis on high quality design with respect to adaptive re-use.	Support in Principle – Clarification required
Direction 17: Strengthen the network of open spaces and trail connections to support outdoor life, active recreation and connection to nature	Consistent with City of Melbourne position.	Supported
Strategy 67: Make better use of the existing open space network through ongoing investment to ensure it meets community needs.	Suggest rewording to 'Maximise (or improve) the flexibility and resilience of the open space network'. The open space network needs to be protected, particularly from overshadowing by new development.	Support in Principle – Clarification required
Strategy 68: Establish new open spaces within large development sites and urban renewal precincts that contribute to the regional open space network.	Except for the requirements under Clause 53.01, it is unclear how these open spaces will be provided and who will be responsible for their provision.	Support in Principle – Subject to addressing comments
Strategy 69: Create safe and efficient links between public spaces and the shared trail network	Consistent with City of Melbourne position.	Supported
Strategy 70: Investigate opportunities to	Consistent with City of Melbourne position. By referring to 'easements' this strategy does	Supported in Principle subject to addressing comments

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

repurpose existing public land, such as easements, as part of the open space network.	not acknowledge other opportunities such as underutilised State owned land.	
Strategy 71: Utilise the region's open space network to strengthen its tree canopy and urban greening, aided by water sensitive urban design and stormwater harvesting.	Suggest rewording to "Adopt a diverse and holistic approach to strengthen the open space network including integrating urban forestry, water sensitive urban design and stormwater harvesting"	Support in Principle – Subject to addressing comments
Direction 18: Create a legacy of great streets and public spaces that serve the needs of visitors, residents and businesses	Consistent with City of Melbourne position.	Supported
Strategy 72: Identify, enhance and protect existing places and spaces that have high civic or public value, and which contribute to people's understanding, interaction and enjoyment of the region.	Consistent with City of Melbourne position.	Supported
Strategy 73: Ensure that future planning of the region's precincts, activity centres and urban renewal areas enhances and celebrates their distinctive assets, heritage and local character.	Consistent with City of Melbourne position.	Supported
Strategy 74: Upgrade key pedestrian streets and public spaces within each activity centre to foster their civic and community role and to ensure they are	Consistent with City of Melbourne position.	Supported

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

accessible and inclusive. Within urban renewal precincts, create new pedestrian streets and public spaces to serve this role.		
Strategy 75: Encourage road space allocation to prioritise pedestrian movement and spaces within key streets in activity centres and employment precincts.	Consistent with City of Melbourne position, noting earlier comments in the Transport Theme.	Supported
Strategy 76: Identify opportunities to expand the network of boulevards through the region, creating high amenity, green streetscapes that prioritise sustainable and active transport modes.	It is not clear why the network of boulevards needs to be expanded. This Strategy should be amended to read: 'Identify opportunities to create high amenity, green streetscapes that prioritise sustainable and active transport modes.'	Support in Principle - Subject to addressing comments
Strategy 77: Ensure the public realm design of the Inner Metro Region's night-time precincts promotes a high level of safety and amenity.	Consistent with City of Melbourne position.	Supported
Direction 19: Protect the region's landscapes and biodiversity	Consistent with City of Melbourne position.	Supported
Strategy 78: Work with Traditional Owners to plan, manage and protect assets and places of high cultural, landscape and biodiversity value.	Consistent with City of Melbourne position.	Supported
Strategy 79: Ensure the siting and design of new buildings and infrastructure responds to the region's significant landscape features.	Consistent with City of Melbourne position.	Supported

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

Strategy 80: Reinvigorate and restore urban waterways, recognising their important role in providing biodiversity, open space, water management and movement corridors.	Consistent with City of Melbourne position. The word 'protect' should be added to this Strategy: 'Protect, reinvigorate and.....'	Supported
Actions		
Action 7: Develop and implement an Indigenous design approach to incorporate Aboriginal cultural heritage, design and stories into the region's built and natural environment. This process will involve extensive collaboration and engagement with Aboriginal and Torres Strait Islander peoples across the region. This could be a pilot project suitable for other regions.	Support – noting there is a need to engage with Traditional Owners and also other urban Aboriginal communities that live in these areas.	Support in Principle -
Action 8: Work with Traditional Owners and research organisations to develop specific and measurable actions to increase biodiversity and resilience of urban ecosystems, particularly those that do not have high biodiversity value.	Support – noting there is a need to engage with Traditional Owners and also other urban Aboriginal communities that live in these areas.	Support in Principle -

Table 6-1 Comments on Directions, Strategies and Actions for Housing Choice Theme

In addition, the City of Melbourne notes that further exploration is required to protect and support cultural and creative land uses, given the strengths cultural and creative uses provides the Inner Metro Region.

7. Strong Communities

The City of Melbourne supports strong and sustainable communities, encompassing not only its resident population, but also its workers that live outside the municipality, as well as visitors. The Inner Metro region needs to support both its resident and a significant visiting population.

This theme currently identifies State significant health, education, sports and justice social infrastructure, but does not discuss arts and cultural facilities, as well as the broader fabric of social infrastructure that may serve localised needs.

Adequate levels of access to social infrastructure will reinforce not only the State Government policy of 20-minute neighbourhoods, but also build stronger communities within the Inner Metro region, while reflecting the diversity that exists.

The City of Melbourne developed Frameworks to guide decision making about the number and type of facilities to respond to growing and shifting demand, particularly given that some types of social infrastructure are less regulated than others.

The City of Melbourne currently identifies the following typologies of social infrastructure:

- Education
- Health and wellbeing
- General community
- Libraries
- Arts and culture
- Affordable housing
- Recreation

The IMLUFP needs to explore the broader fabric of social infrastructure.

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

7.1. Review of Directions, Strategies and Actions

Plan Melbourne Outcome 5: Melbourne is a city of inclusive, vibrant and healthy neighbourhoods, underpins the theme of Strong Communities.

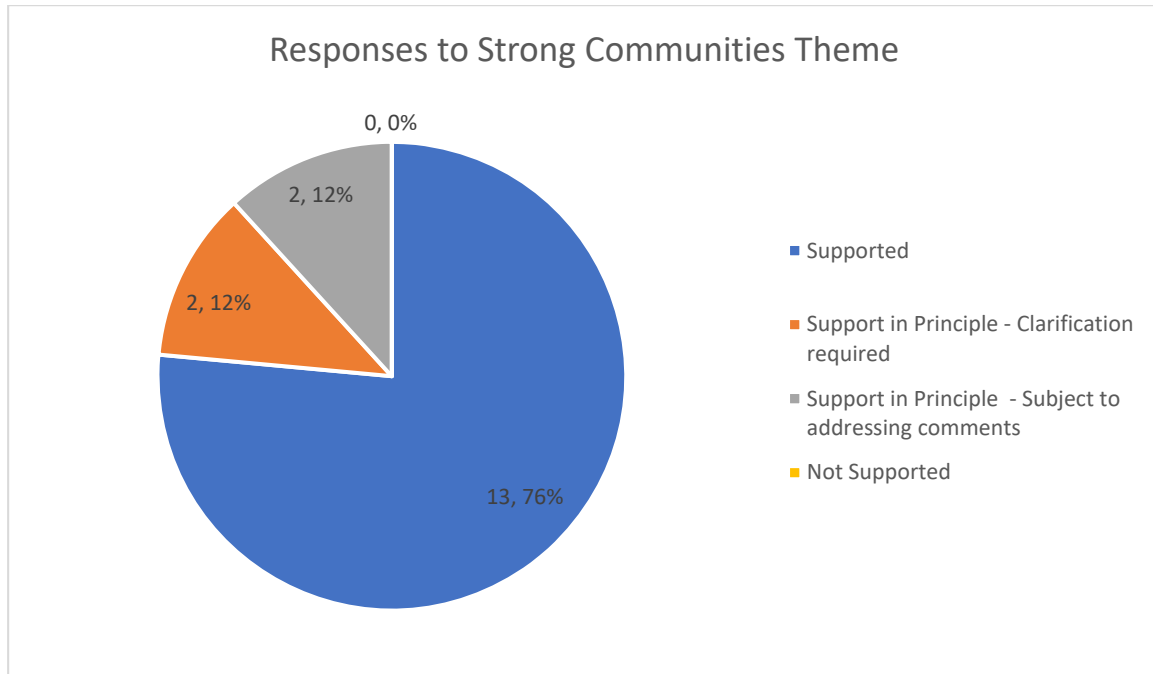


Figure 7-1 Summary of City of Melbourne responses to Strong Communities Theme

Specific feedback within this theme includes:

Draft Framework Strategy/Action	Comments from City of Melbourne	City of Melbourne Position
Direction 20: Plan for major social infrastructure at a regional level to meet the needs of residents, workers and visitors	Consistent with City of Melbourne position.	Supported
Strategy 81: Review the demand for, and opportunity to, upgrade and expand existing social infrastructure such as libraries or facilities for recreation, health or education, to enable them to be more flexible and intensively used.	City of Melbourne suggests that this strategy also include arts and cultural facilities.	Support in Principle – Subject to addressing comments
Strategy 82: Plan for the early delivery of community	Early delivery of social infrastructure important for building community resilience.	Supported

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

hubs and other social infrastructure in urban renewal areas to appropriately service their future populations.		
Strategy 83: Encourage planning for major social infrastructure (such as libraries, recreation facilities, cultural centres or community hubs) to be undertaken in conjunction with neighbouring regions to maximise co-location of facilities.	Consistent with City of Melbourne position.	Supported
Strategy 84: Locate social infrastructure near activity centres and to be accessible by walking, cycling or public transport.	Consistent with City of Melbourne position.	Supported
Strategy 85: Support regional planning that will provide for a range of sporting and active recreation facilities to meet the needs of the growing population.	Consistent with City of Melbourne position. It is not clear why is sport listed separately. See Strategy 83 above.	Support in Principle – Clarification required
Direction 21: Support the region's role in delivering state-significant health and education services while providing for the local community	Consistent with City of Melbourne position.	Supported
Strategy 86: Strengthen the role of health and/or education precincts of the Inner Metro Region by co-locating new health and/or education facilities within these precincts and encouraging an	The City of Melbourne supports where possible the co-location of facilities to enhance access and provide suitable efficiencies.	Supported

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

agglomeration of ancillary uses such as primary healthcare, retail and accommodation.		
Strategy 87: Expand the network of health and education facilities and precincts across the region to meet the needs of the growing population. Ensure that these facilities and precincts are accessible by public transport, walking and cycling.	It is imperative that these facilities accommodate the diversity of the community, including a significant international student population.	Supported
Strategy 88: Support the upgrade of existing health and education infrastructure to encourage more intensive use of those services.	Consistent with City of Melbourne position.	Supported
Strategy 89: Facilitate health and education facilities in major urban renewal precincts as an integral part of the region's social infrastructure network and economy.	Early delivery of this social infrastructure is supported.	Supported
Direction 22: Strengthen the Inner Metro Region's network of 20-minute neighbourhoods	Consistent with City of Melbourne position.	Supported
Strategy 90: Plan for existing and new activity centres to embed the 20-minute neighbourhood hallmarks, through a place-based, community partnership approach.	Consistent with City of Melbourne position.	Supported
Strategy 91: Support a consistent designation of neighbourhood activity	The Inner Region and particularly the City of Melbourne has a different pattern of activity compared to the rest of metropolitan Melbourne. Employment, retail, community	Supported subject to clarification.

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

centres and their role in the network of activity centres across the Inner Metro Region.	and allied health services are not confined to activity centres. It is not clear what purpose a consistent designation will serve.	
Strategy 92: Support the role of neighbourhood activity centres to provide a range of retail, community and allied health services to their respective local catchments.	Consistent with City of Melbourne position.	Supported
Strategy 93: Ensure the planning and design of urban renewal precincts and major transport infrastructure projects maximises opportunities to embed the hallmarks of 20-minute neighbourhoods.	Consistent with City of Melbourne position, noting the advantages in early delivery of social infrastructure.	Supported
Actions		
Action 9: Develop a methodology for a social infrastructure strategy for the Inner Metro Region. This would consider social infrastructure such as libraries, multi-use community and recreation facilities, and assess how they can be used more flexibly and intensively. This could be a pilot project suitable for other regions.	This action needs to include arts and culture within strategy, particularly given the importance of this typology to not only strong communities, but also to productivity opportunities. The facilities available in private entities such as private schools should also be explored.	Support in Principle - Subject to addressing comments

Table 7-1 Comments on Directions, Strategies and Actions for Strong Communities Theme

City of Melbourne strongly encourages DEWLP to define the term social infrastructure to ensure it suitably captures relevant typologies.

7.2. Additional Considerations

Creative and cultural activities must be factored into social infrastructure. Integrating creative industries and cultural spaces with other community services in urban renewal areas such as Fishermans Bend, Arden and Macaulay, will support local community connection and sense of place.

8. Sustainability and Resilience

Mitigating greenhouse emissions will strengthen the resilience of metropolitan Melbourne and the Inner Metro Region specifically.

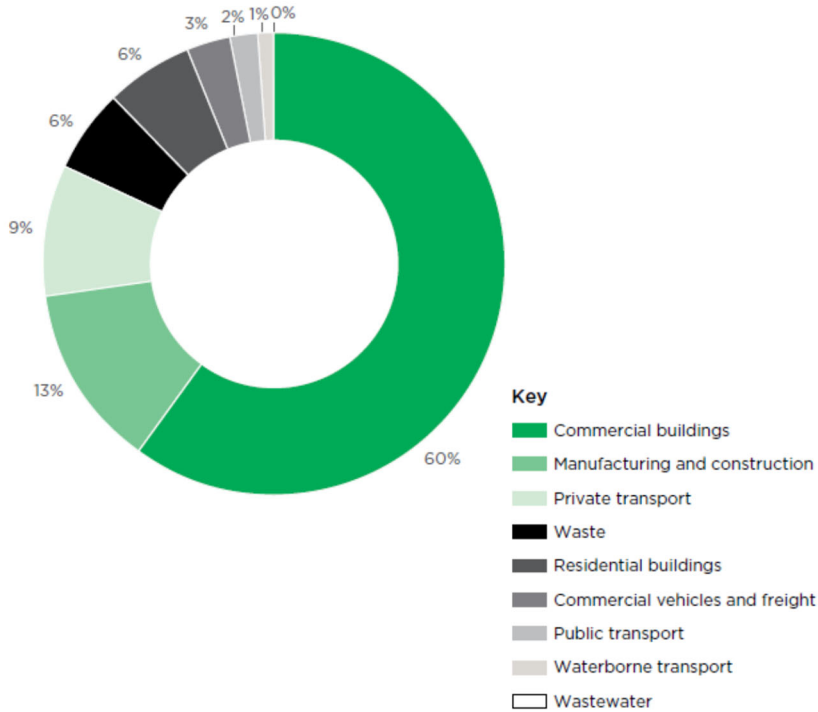


Figure 8-1 Emissions by sector within the City of Melbourne (2017)

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

8.1. Review of Directions, Strategies and Actions

Sustainability and Resilience supports Plan Melbourne Outcome 6: Melbourne is a sustainability and resilient city.

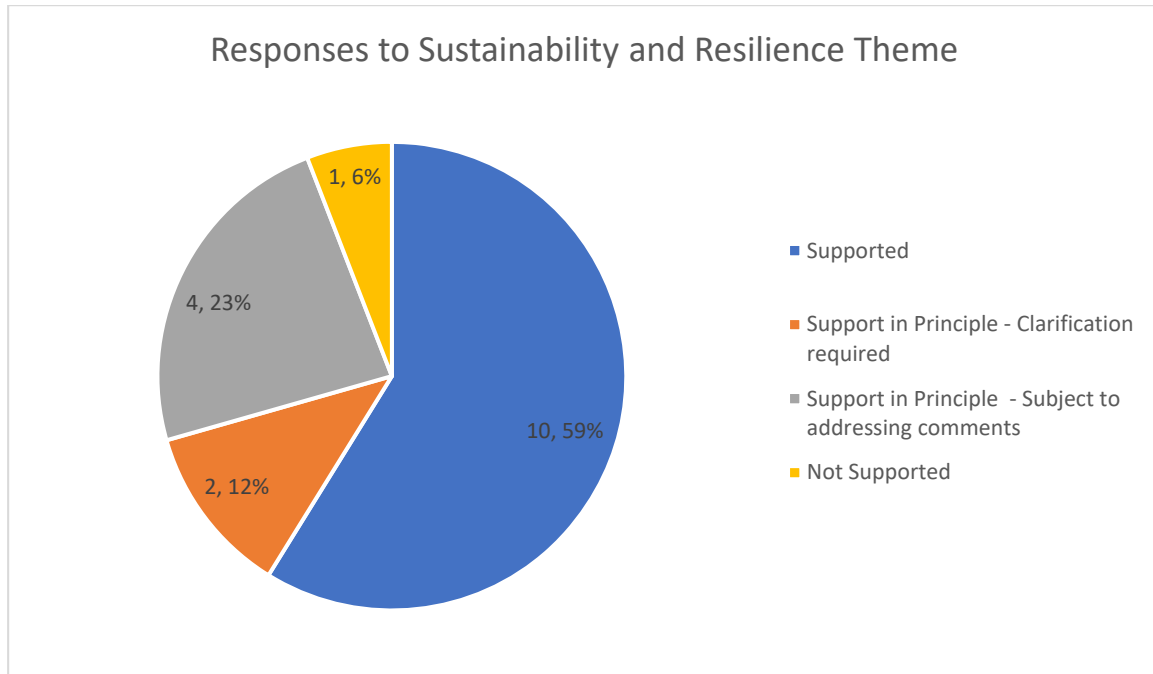


Figure 8-2 Summary of City of Melbourne responses to Sustainability and Resilience Theme

The City of Melbourne provides the following comments:

Draft Framework Strategy/Action	Comments from City of Melbourne	City of Melbourne Position
Direction 23: Integrate cooling and greening initiatives with land use and infrastructure change to assist in managing urban heat	Consistent with City of Melbourne position.	Supported
Strategy 94: Design and develop outdoor spaces that are cool on hot days through materials, vegetation and water sensitive urban design particularly in and around activity centres, within the Central City, on major redevelopment sites and within urban renewal precincts.	Consistent with City of Melbourne position. This strategy should apply everywhere. Therefore the following words should be deleted: ‘...particularly in and around activity centres, within the Central City, on major redevelopment sites and within urban renewal precincts.’	Support in Principle – Clarification required

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

<p>Strategy 95: Encourage the greening of roofs, façades, walls or building setbacks with irrigated, climate resilient planting within apartment developments and large commercial or industrial sites.</p>	<p>City of Melbourne recommends strengthening this by mandating green cover in new developments, rather than encouraging. Furthermore this strategy should apply to all buildings and the following words should therefore be deleted: ‘...within apartment developments and large commercial or industrial sites.’</p>	<p>Support in Principle – Subject to addressing requirements</p>
<p>Direction 24: Increase the tree canopy cover across the Inner Metro Region to achieve 28 per cent cover by 2050</p>	<p>Consistent with City of Melbourne position.</p>	<p>Supported</p>
<p>Strategy 96: Support alternative siting of buildings and more compact building forms to retain mature canopy vegetation.</p>	<p>Consistent with City of Melbourne position.</p>	<p>Supported</p>
<p>Strategy 97: Increase tree canopy along urban waterways and on streetscapes, public land, large developments within activity centres, open spaces and road reserves, and large commercial and industrial sites.</p>	<p>Consistent with City of Melbourne position. This strategy unnecessarily targets specific development according to size in and whether in an activity centre; as well as whether commercial or industrial. This distinction has no logic. A large residential development depending on its location should also be required to increase tree canopy cover.</p> <p>There are some parts of the City of Melbourne such as the Hoddle Grid area where a large commercial development may not be able to increase tree canopy cover. This may also be true of activity centres within the Region.</p> <p>For this reason the City of Melbourne has adopted its Green Factor tool as a tool that prioritises trees but provides options for other types of green cover where intensity of development does not allow for increase in tree canopy.</p>	<p>Support in Principle – Subject to addressing requirements</p>
<p>Strategy 98: Require revegetation within the redevelopment of key</p>	<p>See comments under strategy 97</p>	<p>Support in Principle – Subject to addressing requirements</p>

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

sites, activity centres and urban renewal precincts to allow for the irrigation and spatial requirements of a healthy urban forest and dense tree canopy cover.		
Direction 25: Implement integrated water management initiatives to improve water quality, reduce the impacts of stormwater inundation, utilise stormwater and protect the region's key water assets	Consistent with City of Melbourne position.	Supported
Strategy 99: Implement a regional approach to floodplain management and waterway drainage.	Consistent with City of Melbourne position.	Supported
Strategy 100: Retain and harvest stormwater at a range of scales to achieve co-benefits that respond to urban heat, reduce runoff volume and velocity, service community infrastructure and trees, and reduce reliance on potable water for urban greening.	Consistent with City of Melbourne position.	Supported
Strategy 101: Design development to provide passive irrigation to onsite vegetation and on adjacent public land not affected by industrial contamination and/or seawater infiltration.	Consistent with City of Melbourne position.	Support
Direction 26: Design urban renewal precincts and major redevelopment sites to support zero emissions	This should apply to all development across the region. Please see C376melb.	Support in Principle - Subject to addressing comments

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

and climate resilient urban areas		
Strategy 102: Maximise the thermal efficiency and ability to support renewable and smart energy technology of the built environment through site layout and precinct design in major redevelopment sites and urban renewal precincts.	Consistent with City of Melbourne position. See comments under strategy 97.	Supported
Strategy 103: Design buildings and the public realm with future stormwater needs and opportunities as a priority consideration to inform other precinct and building design outcomes and enhance pedestrian environments.	Consistent with City of Melbourne position.	Supported
Actions		
Action 10: Identify non-residential land where additional canopy trees can be planted to offset vegetation removal.	It is not clear why non-residential land is singled out for tree planting.	Not Supported
Action 11: Investigate options to develop a pilot fund to underground powerlines to support expanded tree canopy cover.	Improved underground growing conditions of established and new trees is fundamentally important for expansion of tree canopies, any underground infrastructure would need to be planned around tree root growth zones for this to be successful.	Support in Principle - Clarification required
Action 12: Undertake detailed coastal settlement planning to identify short-, medium- and long-term options to reduce risk to population, infrastructure, ecosystems and property from sea level	Consistent with City of Melbourne position.	Supported

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

rise, storm surges, coastal erosion, tidal inundation and saline groundwater intrusion.		
---	--	--

Table 8-1 Comments on Directions, Strategies and Actions for Sustainability and Resilience Theme

The City of Melbourne has undertaken substantial efforts in enhancing sustainability and resilience through Melbourne Planning Scheme Amendment C376 and the proposed Design and Development Overlay that seeks to reduce greenhouse gas emissions, manage water and waste and reduce heat impact.

CITY OF MELBOURNE

Draft Inner Metro Land Use Framework Plan Submission

9. Conclusion

There are a total of 23 directions, 103 strategies and 12 actions within the IMLUFP, of which the City of Melbourne has offered a response from one of the following four options:

Response	Definition
Supported	The initiative is supported as is by the City of Melbourne
Support in Principle – Clarification required	Clarification is required but City of Melbourne is supportive overall of the initiative.
Support in Principle - Subject to addressing comments	Substantive revision is required to support this initiative.
Not Supported	City of Melbourne does not support this initiative as it is contrary to its established position.

Table 9-1 Definition of City of Melbourne responses

Overall, the City of Melbourne supports the intent of the IMLUFP, noting that several initiatives require the addressing of specific comments.

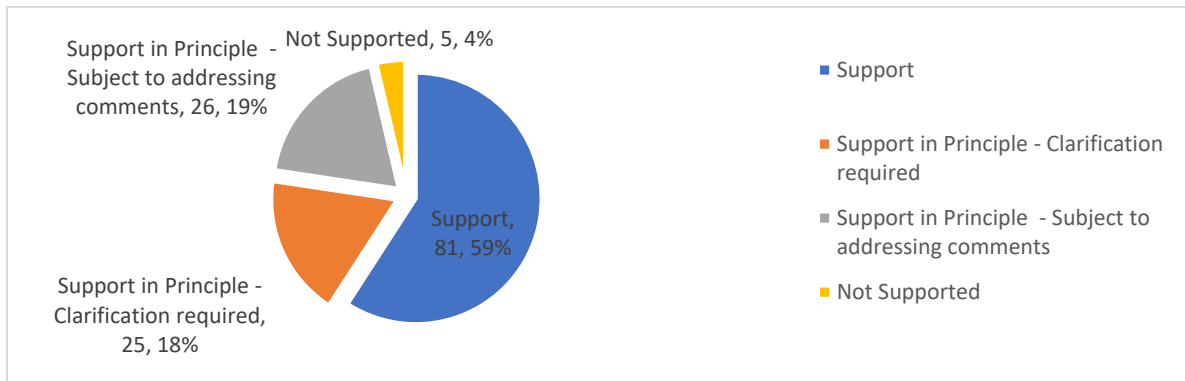


Figure 9-1 Overall level of support from City of Melbourne for the Draft IMLUFP

The City of Melbourne welcomes the progression of the IMLUFP and further opportunities to refine the plan and contribute to the development of the planning scheme amendment to implement it into the City of Melbourne Planning Scheme.