MEG Online Submission Re Plan Melbourne Refresh

December 12, 2015

Name of organisation

MEG (Malvern East Group)

Please select from one of the options below

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Yes

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

If you do not want to provide feedback on this chapter please select 'save & continue'.

The discussion paper includes the option (option 5, page16) that Plan Melbourne better define the key opportunities and challenges for developing Melbourne and outlines some key points for considerations in Box 1. Are there any other opportunities or challenges that we should be aware of?

A Victorian State Government must consider the entire State when talking about development. Strategically-directed, incentive-driven decentralisation is the key to managing population. Melbourne-centric plans omit this vital element. The notion of planning and building a new city (a 'planted' city such as Canberra) with fast rail links to Melbourne is the 'vision' required for this State. The challenge presented to Government is encapsulated in the Jane Monk's words at the Nov.2014 meeting of IMAP...'there has been a tsunami of residential development in commercial areas.' This displacement of retail and office use is non-productive and Government must support creative industries.

The discussion paper includes the option (option 6, page 18) that the United Nations Sustainable Development Goals be included in Plan Melbourne 2016. Do you agree with this idea? If so, how should the goals be incorporated into Plan Melbourne 2016?

Please explain your response

We are looking at sustainable development, economic prosperity, social inclusion and environmental sustainability. Government must develop means of reviewing the progress of sustainability policies in particular....this includes the protection of trees from development. The VPPs must include the prohibition of the destruction of the green canopy in favour of the often quoted policy of 'urban consolidation.'

The discussion paper includes the option (option 7, page 18) to lock down the existing urban growth boundary and modify the action (i.e. the action under Initiative 6.1.1.1 in Plan Melbourne 2014) to reflect this. Do you agree that there should be a permanent urban growth boundary based on the existing boundary?

Agree

Please explain your response

The urban growth boundary has been altered so many times that it really cannot be called a 'boundary.' The answer is to actually make it permanent and 'plant' a city in unused paddocks (see Canberra) in the middle of the State and have a fast rail service to Melbourne. In other words ...establish the boundary and then think beyond it..i.e. not on the edge of it.

The discussion paper includes the option (option 8, page 18) that Plan Melbourne 2016 should more clearly articulate the values of green wedge and peri-urban areas to be protected and safeguarded. How can Plan Melbourne 2016 better articulate the values of green wedges and peri-urban areas? Of course green wedges must be protected. It is of the utmost importance that anything that's green and

growing must be protected. This world will not survive if strong measures aren't taken to retain landscape and bio-diversity values.

The discussion paper includes the option (option 9, page 18) to remove the concept of an Integrated Economic Triangle and replace it with a high-level 2050 concept map for Melbourne (i.e. a map that shows the Expanded Central City, National Employment Clusters, Metropolitan Activity Centres, State-Significant Industrial Precincts, Transport Gateways, Health and Education Precincts and Urban Renewal Precincts). What other elements should be included in a 2050 concept map for Melbourne?

We repeat...there must be a 'vision' for the State not just for Melbourne. It is ridiculous that so much emphasis is being placed on one city which teeters on the edge of this vast continent. Develop a vision for the State and present that to us.

The discussion paper includes the option (option 10, pages 18) that the concept of Melbourne as a polycentric city (i.e. a city with many centres) with 20-minute neighbourhoods (i.e. the ability to meet your everyday (non-work) needs locally, primarily within a 20-minute walk) be better defined. Do the proposed definitions adequately clarify the concepts?

Please explain your response

We agree with the concept of the 20 minute neighbourhood and disagree with the notion of a polycentric city. Insufficient detail is available is given re the polycentric city. The 20 minute neighbourhood has been proposed SO OFTEN and it has never been achieved. Regular, reliable public transport is vital for this and it has never happened though the need for it has been stated regularly..i.e. in EVERY plan for Melbourne. It's not available in Melbourne and certainly not available in the regions. How often must any and every Government be told and how often must they agree and and how often must they fail?

The discussion paper includes options (options 11-17, pages 23 to 27) that identify housing, climate change, people place and identity and partnerships with local government as key concepts that need to be incorporated into Plan Melbourne 2016. Do you support the inclusion of these as key concepts in Plan Melbourne 2016?

Agree

Please explain your response

Option 11 Housing affordability is a term that is used repeatedly and no action is taken to make it happen. The term needs to be clearly defined. Is Government talking about the provision of public or social housing or is it talking about building cheaper houses for people in their 20s, 30s, etc...or is it talking about 'compulsory downsizing?' WHAT is the actual issue? Options 12-13 Council policies such as the "Environmentally Sustainable Development" involve so much work that is regularly defeated by developers. At VCAT Local Policy will always be overridden by stated Government policy so unless all that is in Local Policy is also in the VPPs the greed of developers will triumph. Options 14-15 It goes without saying that all of the elements indicated re the natural and built form should have protection at State Government level and that input from local communities should play a significant role in the protection of their area(s). Option 17 Where is the draft implementation plan? Local Government and local groups must be given the opportunity to have a say in the mechanics involved in delivering the final (?) Plan.

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

Clarify the role of the Metropolitan Planning Authority. Who are they? What are they doing? What is their future role? Their meetings should be open to the public . The input from Councils and local communities must be enshrined in Government legislation.

Climate change comments

No Answer

Chapter 3: Delivering jobs and investment

If you do not want to provide feedback on this chapter please select 'save & continue'.

The discussion paper includes the option (option 20, page 30) to revise the Delivering Jobs and Investment chapter in Plan Melbourne 2014 to ensure the significance and roles of the National Employment Clusters as places of innovation and knowledge-based employment are clear. How can Plan Melbourne 2016 better articulate the significance and roles of the National Employment Clusters as places of innovation and knowledge-based employment?

Access to National Employment Clusters is vital. Fast reliable public transport must be provided and basic services must be parts of the 'clusters.' We note that in Monash Municipality recent Governments have sold 5 school sites for housing development....school sites where the buildings could have been refurbished as schools, community centres, child minding centres. The Monash National Employment Cluster cannot function adequately without the provision of basic services for the families of the workers. CSC (Chadstone Shopping Centre) is NOT part of this 'employment cluster' and should be identified as an 'employment cluster' in Stonnington where there is one (only) State primary school, one (only) TAFE, no State secondary

school. At the moment it seems that State Government does not see the need for the provision of basic education services in areas designated as 'employment clusters.' This must change. CSC has bus transport only. The buses accumulate in an outside bus interchange with shade cloth as the only protection and gas heaters operating in the open in winter. Planning Panels Victoria allowed this ridiculous situation. It's time some common sense prevailed in these decisions and indeed would prevail if local communities were given a greater say about the area(s) which they KNOW and which Government bodies do not KNOW.

The discussion paper includes two options (page 30) relating to National Employment Clusters, being:

- Option 21A: Focus planning for National Employment Clusters on core institutions and businesses.
- Option 21B: Take a broader approach to planning for National Employment Clusters that looks beyond the core institutions and businesses.

Which option do you prefer?

No Answer

Please explain why you have chosen your preferred option

This is not relevant to MEG.

The discussion paper includes the option (option 22, pages 30) to broaden the East Werribee National Employment Cluster to call it the Werribee National Employment Cluster in order to encompass the full range of activities and employment activities that make up Werribee. This could include the Werribee Activity Centre and the Werribee Park Tourism Precinct. Do you agree with broadening the East Werribee Cluster?

No Answer

Why?

This is not relevant to MEG except to reiterate that such clusters should be situated in the 'planted' city to which we have referred.

The discussion paper includes the option (option 23, pages 30) to broaden the Dandenong South National Employment Cluster to call it the Dandenong National Employment Cluster in order to encompass the full range of activities and employment activities that make up Dandenong. This could include the Dandenong Metropolitan Activity Centre and Chisholm Institute of TAFE. Do you agree with broadening the Dandenong South National Employment Cluster?

Whv?

See above.

No Answer

The discussion paper includes options (options 24 to 30, pages 34-35) that consider the designation of Activity Centres and criteria for new Activity Centres. Do you have any comments on the designation of Activity Centres or the criteria for new Activity Centres as outlined in the discussion paper?

MEG considers that Stonnington has enough Activity Centres and that the smaller ones should no longer be used as an excuse for high-rise and high density housing development with one shop (usually another cafe) as a token nod to the fact that they have been lumped into a Commercial zone. There should be grading of Commercial zones so that Small Neighbourhood Activity Centres do what they are supposed to do..i.e. provide basic services to the local community thus enabling the 20 minute neighbourhood. It must be clear that a small neighbourhood activity centre is not be be used in the same way that a Principal Activity Centre is used. For example the Neighbourhood Activity Centre in Dandenong Rd. from Tooronga Rd. to Bates St. is designated 'small'...it is a single strip of commercial land abutting a highly sensitive predominantly single storey residential area. So far VCAT with the assistance of Planning Panels Victoria has allowed 18 storeys, 6 storeys, 7 storeys and three 8 storey developments...just as if it were Chapel St. Government policy MUST stop this. It must be made absolutely clear that this part of Stonnington is not part of the Caulfield Station Urban Renewal Precinct. Clear distinctions must be made between Activity Centres. At present developers view small neighbourhood activity centres as targets for high-density, high-rise housing development and the token nod to the fact that they are designated Commercial is invariably yet another cafe. We refer specifically to the small neighbourhood activity centre on Dandenong Rd. from

Tooronga Rd. to Bates St. With the assistance of Planning Panels Victoria and VCAT along this small strip so far we have an 18 storey development, 6 storeys, 7 storeys and three 8 storey efforts. These are all abutting highly sensitive residential areas. We urge you to make a clear statement that this is NOT part of the Caulfield Station Urban Renewal Precinct so that what's left of the small strip is not littered with even more 'dogboxes.'

The discussion paper includes the option (option 31, page 35) to evaluate the range of planning mechanisms available to protect strategic agricultural land. What types of agricultural land and agricultural activities need to be protected and how could the planning system better protect them?

An immoveable Urban Growth Boundary would protect any productive agricultural that's left from the ravages of endless, barren housing developments.

The discussion paper includes the option (option 32, page 36) to implement the outcomes of the Extractive Industries Taskforce through the planning scheme, including Regional Growth Plans, to affirm that extractive industries resources are protected to provide an economic supply of materials for construction and road industries. Do you have any comments in relation to extractive industries? Reference page 36.

No Answer

Any other comments about chapter 3 (delivering jobs and investment)?

Designated Commercial Zones must primarily be used for commercial purposes and NOT for high density development.

Chapter 4. A more connected Melbourne

If you do not want to provide feedback on this chapter please select 'save & continue'.

The discussion paper includes the option (option 34, page 42) to include the Principal Public Transport Network in Plan Melbourne 2016. Do you agree that the Principal Public Transport Network should inform land use choices and decisions?

Strongly Agree

Why?

It should happen but will it? IF it actually happens consideration should be given to factors within residential areas such as neighbourhood character, heritage, and amenity impacts.

The discussion paper includes the option (option 35, page 43) to incorporate references to Active Transport Victoria (which aims to increase participation and safety among cyclists and pedestrians) in Plan Melbourne 2016. How should walking and cycling networks influence and integrate with land use?

Designated cycle paths are a positive outcome in terms of the environment but they are hazardous in narrow streets, impossible when in one way streets because cyclists do not appear to be constrained by the 'one-way' issue, equally hazardous where there are traffic lights because cyclists do not appear to consider that RED means STOP for them as well as pedestrians and motorists. So hand in hand with cycling paths we suggest you embark on an education program for cyclists intending to use public roads.

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

No Answer

Chapter 5. Housing

If you do not want to provide feedback on this chapter please select 'save & continue'.

The discussion paper includes the option (option 36A, pages 46) to establish a 70/30 target where established areas provide 70 per cent of Melbourne's new housing supply and greenfield growth areas provide 30 per cent. Do you agree with establishing a 70/30 target for housing supply? Disagree

Why?

No targets. Housing targets are the 'food' of developers. Build a new city. Buy some empty paddocks and PLAN a city for the 21st century. (See...Canberra)

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

We realise that VCAT is not in the Planning Minister's portfolio however in conjunction with the Attorney General the Planning Minister State Government MUST consider a complete overhaul of the processes at VCAT. The issues have been put to the previous Planning Minister and Attorney General. It has been mentioned to the present Planning Minister and the Senior Adviser to the Attorney General. It is imperative that this matter be considered ASAP.

The discussion paper includes the option (option 36B, page 46) to investigate a mechanism to manage the sequence and density of the remaining Precinct Structure Plans based on land supply needs. Do you agree with this idea?

Agree

Why?

See Growth areas.

The discussion paper includes the option (option 36C, page 46) to focus metropolitan planning on unlocking housing supply in established areas, particularly within areas specifically targeted for growth and intensification. Do you agree with this idea?

Strongly Disagree

Why?

We strongly disagree with what you call "unlocking housing supply in established areas." In the new residential zones legislation Stonnington was permitted to have 37.5% of the prized NRZ. It is quite obvious that this municipality has unlocked far too much already and Roz Hansen's obsession with telling us that we are to get over our "obsession" with the quarter-acre block is an insult. Stonnington's backyards have a vast canopy of trees and shrubs which serve a multitude of purposes...i.e. absorbing pollution, providing a cooling effect, promoting good health, etc. Councils cannot provide all of this in street trees and parks. Apart from Glen Eira we have the least amount of public open space per capita in Victoria. Land is too expensive. State Government won't even give us an open entry secondary school because the land is so expensive. If we accede to the sheer nonsense of developing what the bit the last Government left us we'll lose the diverse green contribution that residents make to the environment in their own gardens. MEG has started a campaign urging our members to "Plant a tree for 2016." No more development except in the treeless, dreary, high-rise confines of the Forrest Hill Precinct. Leave what's left of the established areas alone.

The discussion paper includes options (option 37, page 50) to better define and communicate Melbourne's housing needs by either:

- Option 37A: Setting housing targets for metropolitan Melbourne and each subregion relating to housing diversity, supply and affordability
- Option 37B: Developing a metropolitan Housing Strategy that includes a Housing Plan

Which option do you prefer?

Other

The discussion paper includes the option (option 38, page 52) to introduce a policy statement in Plan Melbourne 2016 to support population and housing growth in defined locations and acknowledge that some areas within defined locations will require planning protection based on their valued character. How could Plan Melbourne 2016 clarify those locations in which higher scales of change are supported?

This has already been done in Stonnington. With only 37.5% of NRZ you must be aware that 69.5% contains loads of opportunities for growth.

The discussion paper includes the option (option 39, page 52) to clarify the direction to 'protect the suburbs'. How could Plan Melbourne 2016 clarify the direction to protect Melbourne and its suburbs from inappropriate development?

"Protecting our suburbs" has become a joke in this municipality. They can't be protected from greed. What we try to save VCAT destroys and uses State Government's policy of Urban Consolidation to support their decisions. In the meantime we are forced to accept higher density development in all areas. The dual occs are creeping into the Heritage Overlays...high density and, in some cases high-rise developments, abut the HOs and the NCOs.

The discussion paper includes the option (option 40, page 56) to clarify the action to apply the Neighbourhood Residential Zone to at least 50 per cent of residential land by:

 Option 40A: Deleting the action and replacing it with a direction that clarifies how the residential zones should be applied to respect valued character and deliver housing diversity

 Option 40B: Retain at least 50 per cent as a guide but expand the criteria to enable variations between municipalities

Which option do you prefer?

Option 40A

The discussion paper includes the option (option 42, page 58) to include an action in Plan Melbourne 2016 to investigate how the building and planning system can facilitate housing that readily adapts to the changing needs of households over the life of a dwelling. In what other ways can Plan Melbourne 2016 support greater housing diversity?

We don't need greater housing diversity. What we need is a 'planted city.' Melbourne does not need to be bigger. We are aware that people like to live in cities so build one. There has been enough tampering with what is good about this city. We have lost too much of what is valuable. The historic fabric is being destroyed. Start again and try to do better.

A number of options are outlined in the discussion paper (page 58) to improve housing affordability, including:

- Option 45A: Consider introducing planning tools that mandate or facilitate or provide incentives to increase social and affordable housing supply.
- Option 45B: Evaluate the affordable housing initiative pilot for land sold by government to determine whether to extend this to other suitable land sold by government.
- Option 45C: Identify planning scheme requirements that could be waived or reduced without compromising the amenity of social and affordable housing or neighbouring properties.

What other ideas do you have for how Plan Melbourne 2016 can improve housing affordability?

Deal with Fishermans Bend in a practical way. The first thing that should have been done with that land was to build an urban forest...(see the urban forest between Dandenong & Waverley Rds.) It's not too late..build one now. Then plan the area as if it were a 'planted' city...i.e. with all the ideas that you promote in your paper...except the elimination of the home gardens as proposed by Roz Hansen. In that area you can have all the diversity the Government wants. Leave the established suburbs alone.

Any other comments about chapter 5 (housing)?

No Answer

Chapter 6. A more resilient and environmentally sustainable Melbourne

If you do not want to provide feedback on this chapter please select 'save & continue'.

The discussion paper includes the option (option 46, page 69) to introduce Strategic Environmental Principles in Plan Melbourne 2016 to guide implementation of environment, climate change and water initiatives. Do you agree with the inclusion of Strategic Environmental Principles in Plan Melbourne 2016?

Agree Why? No Answer

The discussion paper includes the option (option 47, page 72) proposes to review policy and hazard management planning tools (such as overlays) to ensure the planning system responds to climate change challenges. Do you agree with this proposal?

Agree

Why?

Planning must respond to climate change challenges and tools are required to enable adequate response. The discussion paper includes options (options 48 and 49, page 72) to update hazard mapping to promote resilience and avoid unacceptable risk, and update periodically the planning system and supporting legislative and policy frameworks to reflect best available climate change science and data. Do you have any comments on these options?

No Answer

The discussion paper includes the option (option 50, pages 73) to incorporate natural hazard management criteria into Victorian planning schemes to improve planning in areas exposed to climate change and environmental risks. Do you agree with this idea?

Agree

Whv?

A state-wide approach to these matters is just commonsense.

The discussion paper includes the option (option 51, page 75) to investigate consideration of climate change risks in infrastructure planning in the land use planning system, including consideration of an 'infrastructure resilience test'. Do you agree that a more structured approach to consideration of climate change risks in infrastructure planning has merit?

Agree

Why?

Ever-increasing development places too much additional and unreasonable pressure on existing infrastructure. Extra resources must be given to Council if it is expected to deal with this.

The discussion paper includes the option (option 52, page 76) to strengthen high-priority habitat corridors throughout Melbourne and its peri-urban areas to improve long-term health of key flora and fauna habitat. Do you agree with this proposal?

Agree

Why?

Protection of the natural environment is imperative. Suggest that VicRoads be stopped from cutting down any more trees in its road-building activities in country areas. Build roads around the forests the way they build roads around the towns.

The discussion paper includes options (options 53 and 54, pages 78 and 79) to introduce strategies to cool our city including: increasing tree canopy, vegetated ground cover and permeable surfaces; use of Water Sensitive Urban Design and irrigation; and encouraging the uptake of green roofs, facades and walls, as appropriate materials used for pavements and buildings with low heat-absorption properties. What other strategies could be beneficial for cooling our built environment? Melbourne City Council is working to increase its tree canopy from 22% to 40% by 2040. All councils should be doing the same thing and this can be achieved partially through actually giving a tree to every householder. Follow through with MEG's campaign to "Plant a tree for 2016." Government can promote the same idea. This was done in Brisbane years ago with the result that the streets are heavily planted as are the older housing blocks. If Brisbane could do it so can we.

The discussion paper includes the option (option 56A, page 80) to investigate opportunities in the land use planning system, such as strong supporting planning policy, to facilitate the increased uptake of renewable and low-emission energy in Melbourne and its peri-urban areas. Do you agree that stronger land use planning policies are needed to facilitate the uptake of renewable and low-emission energy?

Agree

Why?

Refer to our suggestions about encouraging the planting of trees. Help residents in the care of trees. The discussion paper includes options (options 56B and 56C page 80) to strengthen the structure planning process to facilitate future renewable and low emission energy generation technologies in greenfield and urban renewal precincts and require consideration of the costs and benefits of renewable or low-emission energy options across a precinct. Do you agree that the structure planning process should facilitate the uptake of renewable and low-emission technologies in greenfield and urban renewal precincts?

Agree

Why?

See above

The discussion paper includes the option (option 57, page 81) to take an integrated approach to planning and building to strengthen Environmentally Sustainable Design, including consideration of costs and benefits. Do you agree that an integrated planning and building approach would

strengthen Environmentally Sustainable Design?

Agree

Why?

The design of most high density high rise developments do not include insulation, green elements, eaves and other energy efficiency elements. Developments should have to meet an energy rating of the highest order. At the moment it seems that, except for the expensive developments, the lowest possible denominator is the aim of developers.

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

No Answer

Chapter 7. New planning tools

If you do not want to provide feedback on this chapter please selected 'save & continue'.

Please provide your feedback on 'Chapter 7. New planning tools' below. If you do not want to provide feedback on this chapter please selected 'save & continue'.

No Answer

The discussion paper includes options (options 58A and 58B, page 84) to evaluate whether new or existing planning tools (zones and overlays) could be applied to National Employment Clusters and urban renewal areas. Do you have any comments on the planning tools (zones and overlays) needed for National Employment Clusters and urban renewal areas?

If the complexity of existing planning schemes is to be reduced residents and resident groups must be consulted. This sort of action tends to operate for the benefit of the development industry.

The discussion paper includes options (options 59A and 59B, page 84) to evaluate the merits of code assessment for multi-unit development, taking into account the findings from the 'Better Apartments' process, to either replace ResCode with a codified process for multi-unit development or identify ResCode standards that can be codified. Do you have any comments on the merits of code assessment for multi-unit development?

We are totally opposed to the system of code assessment for multi-uni development. It is a gift to developers who are barely restrained now. To tell them that they can assess their own project would result in an even lower quality development than what we have now...if that is possible! Neighbourhood character would not fit into a code assessment process. Code assessment totally excludes residents and resident groups from the planning process.

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

No Answer

Chapter 8. Implementation

If you do not want to provide feedback on this chapter please selected 'save & continue'.

The discussion paper includes the option (options 1 and 61, pages 14 and 90) of Plan Melbourne being an enduring strategy with a long-term focus supported by a 'rolling' implementation plan. Do you agree that separating the long-term strategy from a shorter-term supporting implementation plan is a good idea?

MEG would like the opportunity to review and comment on the implementation plan prior to finalisation. If a separate implementation plan is developed for Plan Melbourne 2016 what will make it effective? No Answer

Any other comments about chapter 8 (implementation)?

The entire municipality of Stonnington is in a sub-region of its own...i.e. Plan Melbourne indicates that the entire area from Punt Rd. to Warrigal Rd. is comprised of the same characteristics. This is a nonsense. The area that was the old City of Prahran has long been considered Inner Melbourne while the rest of the municipality was considered part of the Eastern District. How this can all be lumped into one region and dealt with as one region is ridiculous and the matter should be addressed and corrected.