

Submission to the Melbourne 2030 Audit

Boroondara City Council

2378

Direction 1: A more compact city

Hierarchy of Activity Centres

Importance 4 ●●●●

Comment:

• There is a need to review the hierarchy of Activity Centres once Structure Planning work is complete. It is clear that there are significant constraints to expansion and intensification of some Activity Centres. These constraints include traffic and car-parking issues, public transport availability, infrastructure capacity, the existing form of development, heritage protection and current lot pattern/road layout etc. Activity Centres have differing capacity to accommodate growth and the hierarchy of Activity Centres should better reflect this capacity.

Recommendation:

• That the hierarchy of Activity Centres be reviewed once Structure Planning work is complete for Principal and Major Activity centres, acknowledging that the capacity to accommodate growth will differ between centres.

Rationale:

- To ensure that the hierarchy of Activity Centres reflects the capacity of the centre to accommodate growth and changed functions.
- To give priority to those Activity Centres with the greatest capacity to accommodate growth and change and that this be reflected in the hierarchy of Activity Centres.

Future Implementation of Structure Plans

Importance 5 ●●●●●

Comment:

- The completion of Structure Plans will necessitate careful attention to implementation arrangements. Structure Plans are more than land use and development plans, for example they will include recommendations relating to transport improvements, upgrading of public spaces and streetscapes, capital works etc.
- Achieving the implementation of Structure Plan outcomes will require changes to the suite of planning controls available for Activity Centres, and will require the preparation of detailed management and action implementation plans. It will be important that VCAT be required to apply local policy, and that policy and controls be able to contain prescriptive requirements to provide certainty.
- Melbourne 2030 implementation should recognise that strategies to implement Structure Plans will vary across Councils.

Recommendation:

- That further consideration be given to implementation and management approaches to ensure Structure Plan actions appropriate to the local context are implemented effectively.
- That changes to the suite of planning controls be considered to facilitate the implementation of Structure Plans, and to provide greater levels of certainty.
- That there be recognition that strategies across Councils will vary.

Rationale:

- To further develop implementation and management approaches to ensure that Structure Plan actions are achieved.
- To ensure planning controls facilitate the implementation of Structure Plans.
- To ensure that Structure Plan implementation acknowledges that strategies across Councils will vary.

Development Contributions in Structure Plan Areas

Importance 4 ●●●●

Comment:

- There is a need to ensure that mechanisms are available to seek developer contributions in Activity Centres for which a Structure Plan has been prepared. Developer contributions are required to assist in the implementation of Structure Plan recommendations – particularly those recommendations in relation to public realm and streetscape improvements.
- Currently, a Developer Contributions Plan is required to achieve this outcome, the arrangements of which are complex. These arrangements need to be simplified to ensure that developer contributions are realised by Local Governments.

Recommendation:

• That consideration be given to simplified mechanisms that allow Councils to seek development contributions and levies to assist in the implementation of Structure Plan actions.

Rationale:

- To provide mechanisms to assist in funding the implementation of Structure Plans.

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Regional Housing Statements and Local Housing Strategies

Importance 4 ●●●●

Comment:

- The Eastern Regional Housing Statement identifies that the City of Boroondara has the capacity to accommodate between 7,000 - 8,000 additional households within the municipality from 2005 - 2031. It is anticipated that the majority of residential development will be accommodated around Activity Centres, Mixed Use Corridors and through major redevelopment sites. These are the preferred locations for new residential development identified in the Council's Draft Local Housing Strategy, the 'My Neighbourhood Strategy'.
- Population forecast data prepared by the City of Boroondara indicates that Boroondara's population will continue to age over the next 15 years and household size will decrease.
- Incremental new residential development has continued in established suburbs (both in the form of new replacement detached single dwellings and small-scale, multi-unit infill projects). Correct emphasis should be on protecting the valued character of established suburbs before predicting the level of new development which may be accommodated in those areas.
- Key redevelopment sites, particularly Kew Residential Services and Tooronga Village, will make a substantial contribution to the addition of new residential dwellings in Boroondara with the Kew Residential Services site proposed to accommodate approximately 520 dwellings and Tooronga Village up to 600 dwellings.
- The development of Local Housing Strategies will need to take account of the key policy emphasis and identify areas where new housing will be encouraged, where the protection of the existing character should occur and where infill development will continue to be appropriately directed.
- The range of measures to implement housing strategies needs to be reviewed. There will be a need for a variety of approaches (including increased use of prescriptive controls and greater use of overlay controls to protect character) and for the Department of Planning and Community Development to support a variety of measures to achieve local outcomes.
- In this regard, it should be noted that Department of Planning and Community Development has not supported the implementation of the Residential 3 Zone within Boroondara.
- It is also noted that the Urban Development Program needs to be responsive to the policy directions of local housing strategies.

Recommendation:

- That Council continue to implement the Regional Housing Strategy actions and ensure that housing provision is responsive to changing demographic needs.
- That greater priority be given to increasing the protection of the valued character of established suburbs before predicting the level of new development which may be appropriate.
- That in reviewing Local Housing Strategies:
 - o Greater emphasis be given to defining areas where residential character will be protected and new infill development will be discouraged (e.g. heritage areas, areas of consistent urban character and areas of environmental/landscape significance);
 - o Areas where new residential development is encouraged (Activity Centres, key redevelopment sites and in designated corridors) be identified and appropriate policy and planning frameworks be prepared; and
 - o Incremental infill development be limited to specified areas (e.g. on main roads, adjacent to the Principal Public Transport Network) and that infill development be limited in those areas where the emphasis is on protection of the valued existing character.
- That the Urban Development Program which forecasts residential development needs to be reviewed to ensure it is more responsive to the directions of Local Housing Strategies.

Rationale:

- To ensure housing provision and the implementation of the Regional Housing Statement is responsive to local circumstances.
- That increased policy emphasis is placed on protecting valued urban character and directing new residential development to appropriate locations.
- That incremental infill development be better managed to ensure policy objectives to protect character are not unduly compromised.

VPP Planning Controls for Activity Centres

Importance 5 ●●●●●

Comment:

- There is a need to review the suite of VPP controls available to implement Activity Centre Policy and completed Structure Plans for Activity Centres. There is a need to ensure local policy is required to be applied, for a broader suite of controls, and for the ability to provide increased prescription to achieve improved certainty of outcome.
- There is need to ensure that local approaches and strategies for Activity Centres are able to be supported through statutory controls (refer to comments under Direction 9 - 'Statutory Controls').
- There is need to review Activity Centre Design Guidelines and guidelines which relate to residential development in Activity Centres.

Recommendation:

- That the suite of VPP controls available to implement Activity Centre Policy and the completed Structure Plans be reviewed to ensure that local strategies and approaches can be implemented with certainty of planning outcome.
- That Activity Centre Design Guidelines and Guidelines for Residential Development in Activity Centres be reviewed to allow for tailored local responses.

Rationale:

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- Ensure VPP controls will support Activity Centre Policy and the implementation of completed Structure Plans.
- Strengthen Design Guidelines for Activity Centres (particularly in relation to residential development).

Neighbourhood Activity Centres

Importance 5 ●●●●●

Comment:

- Neighbourhood Activity Centres within Boroondara are very diverse in terms of size, scale of built form, commercial function, access to public transport and capacity to accommodate new development. There needs to be greater recognition of the differences in the characteristics of these Activity Centres and their capacity to accommodate future growth. Neighbourhood Activity Centres are also not evenly distributed across metropolitan Melbourne and are clustered in established suburbs.
- Structure Plans will not be prepared in the short term for all Neighbourhood Activity Centres. Council has commenced preparation of a Structure Plan for the Balwyn Neighbourhood Activity Centre which is a large neighbourhood centre. In the case of smaller Neighbourhood Activity Centres, it will be necessary to control future built form through mechanisms such as Design and Development Overlay controls. There is an immediate need that interim height controls to be introduced on a permanent basis.
- Melbourne 2030 policy has had significant planning impacts on Neighbourhood Activity Centres, resulting in approval of large scale developments which are out of character with the surrounding area (for example, Mitcham and Tooronga Village).
- Future development in and adjacent to Neighbourhood Activity Centres must fit the context and enhance the existing neighbourhood character. Neighbourhood Activity Centres have very limited capacity to absorb development which will create a new urban character. There needs to be increased emphasis on 'place management' for Neighbourhood Activity Centres.

Recommendation:

- That planning policy for Neighbourhood Activity Centres be refined to better acknowledge the diversity in these types of centres and the limited capacity for many of these centres to absorb development.
- That further consideration be given to a range of statutory controls to manage future built form, given that in the short term Structure Plans will not be completed for all Neighbourhood Activity Centres due to resource constraints and the need to give priority to completing Structure Plans for Principal and Major Activity Centres.
- That permanent height controls be introduced for Neighbourhood Activity Centres to replace the current interim controls.
- That there be greater emphasis given to ensuring that the scale of new development in Neighbourhood Activity Centres is compatible with the established character and well integrated with existing development.

Rationale:

- Strengthened built form controls for Neighbourhood Activity Centres are required in recognition that Structure Plans will not be completed in the short term for such centres.

Retail Policy – Out of Centre Development

Importance 4 ●●●●

Comment:

- Policies relating to 'Out of Centre' development need to be reviewed. Increasingly, 'big-box' retail and bulky goods will not locate in established Activity Centres due to the ease with which they can currently be located 'out of centre'. To reverse this trend and to encourage this retail diversity back into established centres, there is a need to look at innovative approaches to locating bulky goods outlets in Activity Centres.
- To assist in achieving this objective, the 'Out of Centre' guidelines being prepared by the Department of Planning and Community Development must be finalised as a matter of priority.
- There is also a need to better manage 'out of centre' development along key arterial road corridors. For example, Council is seeking to manage growth in Burwood Road, West Hawthorn, through the preparation of an Urban Design Framework and the implementation of a Planning Scheme Amendment which seeks to establish controls to achieve the UDF recommendations.

Recommendation:

- That the Department of Planning and Community Development finalise its 'Out of Centre' guidelines as a matter of priority.
- That revised policies and controls be prepared to manage 'out of centre' development.
- Examination be undertaken into innovative approaches to facilitate the location of 'big box' and bulky good retail in established Activity Centres.
- Support be given by the State Government to the preparation of Urban Design Frameworks to assist in managing corridor development (e.g. along Burwood Road, West Hawthorn).

Rationale:

- 'Out of Centre' development is not being appropriately managed by the existing planning framework.

Site Consolidation in Activity Centres

Importance 3 ●●●

Comment:

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- The majority of Principal and Major Activity Centres identified in Melbourne 2030 are already well-established centres of retail and commercial activity. In the established Activity Centres of the inner and middle-ring suburbs (like those found in Boroondara), the centres are characterised by a variety of lot sizes with multiple owners and other constraints relating to street and infrastructure layout. These physical constraints make site consolidation difficult to achieve in many centres in Boroondara.

Recommendation:

- To examine options to improve site consolidation processes within Principal and Major Activity centres to assist in the implementation of Structure Plan recommendations.
- To explicitly recognise that the ability of Activity Centres to achieve site consolidation is varied due to a range of physical constraints and local conditions.

Rationale:

- To address constraints to achieving Structure Plan recommendations relating to site consolidation.

Key Site Redevelopment prior to Structure Plan Completion

Importance 5 ●●●●●

Comment:

- There are a number of cases where key sites in Principal and Major Activity Centres are being proposed for development ahead of the completion of Structure Plans. There is a need to ensure that in these circumstances, Councils can control site development parameters through either interim Structure Plan controls or by requiring compliance with an Urban Design Framework.
- It is inappropriate for the State Government to seek development of its key assets (for example, the Camberwell Railway Station and the former Hawthorn Police Station site) ahead of the completion of a Structure Plan or a Structure Plan review.
- Intervention by the Priority Development Panel (PDP) has sometimes been used to review development proposals where Structure Plans are not yet complete. This is inappropriate as the processes of appointment and review by the PDP are not sufficiently transparent.

Recommendation:

- That Councils be provided with improved mechanisms (including appropriate interim controls) to manage key site redevelopment ahead of Structure Plan completion.
- That where it is proposed to develop land ahead of completion of a Structure Plan, that it be a requirement that an Urban Design Framework is prepared to the satisfaction of the Responsible Authority to demonstrate how the proposal is consistent with emerging Structure Plan directions and how the proposed redevelopment is responsive to the local context.

Rationale:

- To improve the management of key redevelopment sites which are proposed for development ahead of the completion of a Structure Plan.

Activity Centre Structure Planning

Importance 4 ●●●●●

Comment:

- Activity Centre Structure Planning is resource intensive and time consuming.
- Boroondara Council has commenced preparation of Structure Plans for the Camberwell Junction Principal Activity Centre, the Glenferrie and Kew Junction Major Activity Centres, and the Balwyn Neighbourhood Activity Centre. These plans are being prepared with the involvement of key stakeholders (government agencies, traders, residents) and Council.
- Greater assistance needs to be provided to Local Government to define approaches to implement Structure Plans (specifically to convert the final Structure Plans into planning scheme controls and physical implementation actions) and to fund the actual implementation of Structure Plan recommendations.
- It is critical that Structure Plan preparation properly addresses opportunities and constraints in each Activity Centre and that the State Government accept that in some cases constraints to growth will be required to achieve liveability objectives.
- It is also critical that State Government assist in funding key implementation actions to achieve tangible Structure Plan outcomes.

Recommendation:

- That a greater level of support be provided to Local Government to translate Structure Plans into planning scheme controls.
- That there be greater flexibility in relation to approaches to achieving the implementation of planning outcomes for Structure Plans.
- That additional funding be allocated for the implementation of key Structure Plan initiatives.

Rationale:

- Increase the ability of Local Government to deliver Activity Centre policy in a manner which is responsive to opportunities and constraints.
- Ensure that implementation approaches for Structure Plans are well developed and that Structure Plan outcomes are achieved.

Interim Structure Plans for Activity Centres

Importance 4 ●●●●●

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Comment:

- In September 2004, the Minister for Planning announced the introduction of Interim Structure Plan controls for Activity Centres. The requirements to be met for the introduction of the interim controls by Ministerial Amendment were:
 - o A formal request in writing to be provided from Council.
 - o Demonstration by Council that 'interim' structure planning controls:
 - Are based on substantive progress of a Structure Plan that has involved community consultation and is consistent with the Melbourne 2030 'Structure Planning for Activity Centres' General Practice Note, and
 - Would allow sufficient scope to provide for economic and population growth including the provision for local housing needs consistent with the regional housing aspirations outlined in Melbourne 2030.
 - o Council commits to complete structure planning within a specified time frame. Any interim controls would have a sunset clause of two years.
 - o Council commits to constructively participate in the Regional Housing Working Groups.
- Whilst the principle of applying interim planning controls to Activity Centres in the absence of a Structure Plan has merit, the conditions upon which interim controls may be sought are considered inappropriate.
- Council has raised deficiencies upon which the interim controls were based with the Minister for Planning:
 - o The City of Boroondara, like many other Councils, has not undertaken the necessary structure planning work to be in a position to apply for the interim controls, thereby rendering the proposed interim structure planning controls of little value to the majority of Councils.
 - o The requirement that Structure Plans reflect Melbourne 2030 population, housing and economic objectives is of major concern as these broad objectives do not appropriately reflect local circumstances.
- It is apparent that few Councils have achieved the introduction of interim Structure Plan controls whilst undertaking detailed preparation of Structure Plans.

Recommendation:

- The Department of Planning and Community Development should consider workable alternatives to the announced interim controls, one of which is to allow Councils to seek the early introduction of the controls where they have demonstrated a commitment to undertaking structure planning work.
- That the process for obtaining interim structure planning controls be reviewed to assist Councils to manage land use and development in Principal and Major Activity Centres whilst undertaking detailed structure planning work.

Rationale:

- Interim Structure Plan controls have merit in managing development in Activity Centres and should therefore be made available to Councils whilst they undertake detailed structure planning work.

Housing in Activity Centres

Importance 5 ●●●●●

Comment:

- There is a need to review the level of residential development intensification implied by Melbourne 2030 and the assumed nexus between 'Activity Centres and 'higher density residential development'. It is essential that in the consideration of the appropriateness of Activity Centres for higher density residential development that equal weight be given to Melbourne 2030s 'compact city' direction and 'a great place to be' direction. Council rejects undue weight being attached to intensification of development in Activity Centres at the expense of liveability and neighbourhood character.
- Within the City of Boroondara, market uptake of housing provision in Activity Centres has been limited, despite there being some sites well suited to mixed use development proposals. In some cases, Activity Centres cannot deliver sufficiently high amenity value to make them attractive locations for residential development (for example, lack of open space, congestion etc). It will be difficult to attract residential uses unless other Melbourne 2030 liveability objectives are achieved.
- There is a need to encourage mixed use development in Activity Centres which includes an upper level residential component. There is also a need to acknowledge that residential development in Activity Centres can limit retail and other employment uses.
- Locating a larger proportion of housing in Activity Centres is critical to many of the other directions of Melbourne 2030. Success in providing housing in Activity Centres will depend partly on the quality of the design and how well the housing is integrated so as to minimise conflicts in land uses and to achieve high standards of amenity and 'liveability'.
- A key challenge will be protecting the liveability and amenity of local neighbourhoods surrounding Activity Centres where development will be intensified. There is a need to ensure valued elements of localities are not incrementally lost. There is also a need to consider issues around Activity Centres such as heritage, urban character/residential amenity, physical conditions and infrastructure capacity constraints. The ability to accommodate increased residential development within these constraints.

Recommendation:

- That the level of residential development intensification implied by Melbourne 2030 and the assumed nexus between 'Activity Centres' and 'higher density residential development' be reviewed.
- That the provision of Melbourne 2030 liveability improvements for Activity Centres be considered critical in attracting residential uses.
- That the design of housing in Activity Centres be improved to ensure it is better integrated and to minimise conflicts in land use.
- Ensure neighbourhoods surrounding Activity Centres are properly protected and that the retention of valued elements (including heritage and urban character areas) are supported by State Government policies.

Rationale:

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- To facilitate improved implementation of housing policy for Activity Centres.
- To reduce conflict between residential and other uses in and adjacent to Activity Centres.
- To ensure improved protection of the valued character of neighbourhoods surrounding Activity Centres.

Role and Diversity of Activity Centres

Importance 5 ●●●●●

Comment:

- There is a strong emphasis on the role of Activity Centres in achieving the “more compact city” direction. The direction incorrectly assumes that all Principal, Major and Neighbourhood Activity Centres are appropriate locations for residential and commercial use.
- Melbourne 2030 policy needs to better recognise the diversity of Activity Centre types that are identified as Principal and Major Activity Centres and the capacity of those centres to accommodate future growth. The capacity of these Activity Centres for future growth is varied due to a range of constraints (for example, the heritage fabric in and around the Glenferrie Road Activity Centre). The current Melbourne 2030 policy applies consistent directions and implementation approaches regardless of the differences in the Activity Centre types or in their capacity to accommodate growth.
- There are real constraints to Activity Centre growth in established areas including lack of infrastructure capacity, small lots which require aggregation and traffic congestion car parking demand.
- It is doubtful that Melbourne 2030 has led to a substantial broadening of the activity base in Activity Centres. For example, there has been little market uptake of housing in these centres; there is little evidence of “big-box” retail fitting into established Activity Centres; and limited additional community facilities have or can be provided in these centres.
- Melbourne 2030 policy has had significant planning impacts on Neighbourhood Activity Centres, resulting in approval of large scale developments which are out of character with the surrounding area (for example, Mitcham and Tooronga Village).
- Considerable growth is occurring in main corridors (for example, in West Hawthorn along Burwood Road) where Council is reliant on an Urban Design Framework to manage change.
- It is not possible to be conclusive about the impacts of Melbourne 2030 policy on Activity Centre development and land use. There are many factors which influence development, and metropolitan planning policy is only one of these.
- Melbourne 2030 has been used to support more intensive development proposals, but there has been no corresponding improvement in urban design, liveability and amenity of the public realm in Activity Centres.
- The State Government has failed to ensure its own land is used to deliver Melbourne 2030 outcomes (for example the failure to use the former Hawthorn Police station for social housing, and the failure to require that Camberwell Railway Station be used for a small scale development including a library facility and open space plaza). Instead, the Government is prepared to rely on outcomes determined by market forces, irrespective of policy directions.

Recommendation:

- That there be greater policy recognition of the diversity of Activity Centres identified as Principal and Major Activity Centres,
- That it be explicitly recognised that Activity Centres have differing capacity to accommodate an activity mix of commercial and residential uses.
- That there be explicit recognition that the capacity of Activity Centres to accommodate growth is varied due to a range of capacity constraints and local conditions.
- That Activity Centre policy and its implementation be more responsive to the differing characteristics of Activity Centres and differing opportunities and constraints.
- That there be greater emphasis given to ensuring that the scale of new development in Neighbourhood Activity centres is compatible with the established character and well integrated with existing development.

Rationale:

- To ensure that Activity Centre policy is more responsive to the diversity of Principal and Major Activity Centres having regard to the different form, function and established character of existing centres which Melbourne 2030 designates as Principal and Major Activity Centres.
- To ensure that proper analysis is undertaken of the capacity of Activity Centres to accommodate increased levels of growth and to recognise that in some cases it will be necessary to constrain future growth to achieve “liveability” and amenity objectives.
- To ensure that future policy and its implementation is more responsive to opportunities and constraints identified through Structure Planning for Activity Centres.

Direction 2: Better management of metropolitan growth

Key Redevelopment Sites outside Principal and Major Activity Centres

Importance 4 ●●●●●

Comment:

- Implementation of Melbourne 2030 policy needs to better recognise the contribution of key redevelopment sites outside Principal and Major Activity centres, and the requirements to upgrade infrastructure and service provision as a result of such development.
- There is a need to ensure that redevelopment is properly integrated with the established urban form and that contributions are made to existing services and infrastructure in recognition of changing demands resulting from new redevelopment.

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Recommendation:

- That the contribution of key redevelopment sites outside Principal and Major Activity Centres be recognised, and that development be better integrated with the established urban form.
- That contributions be made to upgrading services and infrastructure in recognition of changed demands resulting from new development.

Rationale:

- Ensure urban development is properly serviced; that key redevelopment sites properly contribute to the provisions of infrastructure and community services and are well integrated with established development.

Urban Growth Boundary

Importance 2 ●●

Comment:

- Council supports the retention of the Urban Growth Boundary to manage outward growth and achieve a consolidated urban form.

Recommendation:

- That the current Urban Growth boundary be retained.

Rationale:

- To achieve a consolidated urban form for metropolitan Melbourne.

Green Wedges

Importance 2 ●●

Comment:

- Council supports green wedge controls, but it is necessary that green wedge planning addresses agricultural productivity, economic and environmental issues to keep and manage sustainable rural land.

Recommendation:

- That the current green wedge policy be retained.

Rationale:

- Ensure sustainable management of rural land.

Direction 3: Networks with the regional cities

Role of Regional Centres

Importance 3 ●●●

Comment:

- Increased emphasis should be placed on the role of regional centres in assisting the containment of the outward growth of metropolitan Melbourne. Melbourne should not be seen as the only location for accommodating future growth.
- Regional centres should become a focus for accommodating future population growth in Victoria. This will ensure that Melbourne remains a 'liveable' city and that neighbourhood and community character aspects of the metropolitan area will be protected.

Recommendation:

- That Melbourne 2030 policy place increased emphasis on the role of regional centres to assist in containing the outward growth of metropolitan Melbourne and in ensuring that metropolitan Melbourne remains a 'liveable' city.

Rationale:

- Promote the development of regional cities.

Direction 4: A more prosperous city

Location of Office Development and Employment Availability

Importance 3 ●●●

Comment:

- Established Principal and Major Activity Centres are desirable locations for office development. There is a need to strengthen opportunities for office development in Activity Centres, particularly as part of mixed use development proposals which include a housing component.
- There is a need to recognise that Principal and Major Activity Centres in Boroondara abut established residential area (including heritage precincts).
- Issues such as the residential interface, scale of development, impacts on residential amenity, and car parking demand are constraints to office development which require the use of more prescriptive controls to deliver greater certainty of planning outcomes

Recommendation:

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- Promote increased mixed use development including office and housing components within Principal and Major Activity Centres.
- Provide increased certainty about development through more prescriptive controls (including height controls).

Rationale:

- Achieve policy objectives relating to the location of housing and office development in Principal and Major Activity Centres.

Protecting Key Assets

Importance 4 ●●●●

Comment:

- That implementation of Melbourne 2030 needs to ensure that key assets which contribute to the liveability of Melbourne are identified and protected. There is a real risk that incremental consolidation and the application of metropolitan-wide policies to Activity Centres will lead to the loss of valued assets which contribute to liveability.

Recommendation:

- That there be stronger emphasis on the identification of key assets which contribute to the liveability of Melbourne and ensuring that such assets are carefully protected in the implementation of Melbourne 2030 policy.

Rationale:

- Increased emphasis on the protection of key assets which contribute to the liveability of Melbourne will minimise negative impacts of Melbourne 2030 policy.

Education

Importance 3 ●●●

Comment:

- Education is a key business in Boroondara. There is a need to ensure land use planning is responsive to the future demands of this sector and that education is maintained as a key competitive strength in the local economy.
- There is a need to promote increased community-based information and training. Community learning centres and libraries should be encouraged to locate in Activity Centres. For example, the Camberwell Railway Station is an ideal location for a library, community facility and open space within the Principal Activity Centre of Camberwell Junction.

Recommendation:

- Ensure land use planning is responsive to the future needs of education service providers.
- Promote increased community-based leaning centres within Activity Centres.

Rationale:

- Ensure education and learning opportunities are available to the community and are located in accessible locations, particularly in Activity Centres.

Direction 5: A great place to be

Heritage

Importance 4 ●●●●

Comment:

- Melbourne 2030 understates the importance of heritage places that adjoin or are located within Activity Centres. These places are central to the identity, amenity, and liveability of urban areas. It is essential that the heritage fabric of traditional strip shopping centres and surrounding residential areas is protected and appropriately managed.
- There is a need to increase support for precinct and site-specific heritage controls to protect valuable heritage assets at both the government and community level. Appropriate design responses for new development in and around identified heritage places is required.
- The cost to Local Government to complete heritage studies is increasingly prohibitive as the level of assessment information required by Panels Victoria becomes increasingly more detailed. These are also increasing difficulties in undertaking planning scheme amendments to introduce Heritage Overlays due to a lack of clarity and consistency in heritage assessment and amendment processes. The result is that places of heritage value are left unprotected and at risk of inappropriate development.
- A recent review of Heritage Overlay provisions has been completed by an Advisory Committee appointed by the Minister for Planning. The findings of the committee have not yet been released.

Recommendation:

- That the importance of heritage places and the contribution they make to the city's identity, amenity and liveability be more explicitly addressed in the strategy.
- That detailed consideration be given to the implementation strategies for Activity Centres to ensure that the protection of heritage fabric is given equal weight to the other objectives of Melbourne 2030 (including intensification of development in Activity Centres).
- To release the findings of the Advisory Committee's consideration of the Heritage Overlay provisions and to undertake further consultation with stakeholders on those findings.
- To review planning scheme controls and VPP Practice Note guidance to ensure a consistent and streamlined approach to heritage

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identification and amendment processes across the state.

- To ensure State Government support for the development of Local Heritage Policies to meet specific heritage management requirements within Local Governments.

Rationale:

- To protect sites and areas of local, state and national heritage significance.

Open Space – Distribution and Protection

Importance 4 ●●●●

Comment:

- The 'A Great Place to Be' Direction refers to the quality and distribution of local open space and the protection of public open space. The City of Boroondara includes regionally significant open space assets (such as the Yarra River corridor and Yarra Bend Park). It is vital that Melbourne 2030 continues to recognise the value of regional open space areas and ensures open space planning by Local Government and other planning authorities.
- Melbourne 2030 should also give emphasis to assuring improved open space within Activity Centres to provide leisure and recreation opportunities. This should be provided to balance the expected increase in commercial and residential uses in and around Activity Centres.
- It is essential that the strategy also facilitate increased open space provision in established neighbourhoods as residential densities increase.

Recommendation:

- That Melbourne 2030 gives greater emphasis to open space planning by Local Government and other planning authorities.
- That the State Government continue to recognise the importance of regional open space assets (eg. Yarra Trail, Yarra River corridor and Yarra Bend Park).
- That Melbourne 2030 ensures the long-term protection of public open space areas, and ensures provision of increased open space in established Activity Centres.

Rationale:

- Melbourne 2030 is intended to manage expected growth within and on the fringe of metropolitan Melbourne. Expected increases in population and development within Activity Centres and at key redevelopment sites must be balanced by increased open space areas. These will be vital for the provision of leisure and recreation opportunities for a growing population.

Urban Design and Urban Design Frameworks

Importance 5 ●●●●●

Comment:

- There is a need to ensure improved urban design outcomes as part of the implementation of Melbourne 2030 and to give greater emphasis to 'place making' aspects of Melbourne 2030.
- There is a need to review and update Urban Design Practice Notes.
- An Urban Design Framework (UDF) provides a valuable tool to conceptualise and test ideas for the design of urban spaces with local communities and stakeholders.
- The 'More Compact City' direction in Melbourne 2030 refers to Activity Centres as a focus for high quality development, incorporating a broad range of services and housing. The 'Activity Centre Design Guidelines 2005' and 'Guidelines for Higher Density Residential Development 2004' have been prepared to assist with the implementation of Melbourne 2030 objectives. However, it is considered that greater emphasis should be given to the use of UDFs in Melbourne 2030 as a tool to guide development at specific sites within Activity Centres. The existing guidelines are not readily applicable to smaller-scale urban spaces, or individual sites which are not intended for high density residential development.

Recommendation:

- That reference to the use of Urban Design Frameworks be included in Melbourne 2030 for key sites.
- That Melbourne 2030 include a requirement for the preparation of Urban Design Frameworks for sites with proposed development of three storeys or more.

Rationale:

- The existing guidelines prepared in conjunction with Melbourne 2030 do not address specific urban spaces within Activity Centres. Urban Design Frameworks offer a valuable tool for Planning Authorities to form a vision for specific sites. This tool is currently neglected in Melbourne 2030.

Neighbourhood Character and Liveability

Importance 5 ●●●●●

Comment:

- Maintaining the highly valued liveability of Melbourne suburbs and ensuring established residential areas do not experience ongoing development pressure is critical to the success of the implementation of Melbourne 2030.

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- There has been limited emphasis on protecting the character of established urban areas. It is appropriate that there be increased emphasis placed on the importance of defining and protecting key character attributes.
- There is a need for Local Policy in relation to Neighbourhood Character and Liveability within planning schemes and for such a policy to be applied by VCAT in consideration of planning permit applications.
- Greater flexibility in the use of measures such as Neighbourhood Character Overlays and variations to residential development standards is required to ensure development is responsive to key neighbourhood character elements.
- The Neighbourhood Principles established as part of the Melbourne 2030 implementation need to be reviewed to better relate to the outcomes which are sought by Melbourne 2030 for established urban areas.
- There needs to be reduced reliance on Rescode to determine infill development outcomes. There needs to be a much stronger emphasis on lifting the quality of the design of infill development and ensuring that it is responsive to the local context and key features of neighbourhood character.
- There is a need for more prescriptive development controls, especially in relation to building height, setbacks and open space provision.
- It is essential that State Government supports Local Governments in their work to ensure that Melbourne is 'a great place to be'. It is necessary for State Government to be supportive of policy approaches that protect 'liveability'.
- The Camberwell Railway Station site is an opportunity site for the State Government to contribute to the city's 'liveability' by supporting community uses and open space provision on the site. State Government agencies have continued to be guided by private developer objectives in relation to the site at the expense of the 'liveability' aspects of the State's own Melbourne 2030 strategy.

Recommendation:

- Ensure increased emphasis is given to maintaining the highly valued liveability of Melbourne suburbs, and that established residential areas do not experience ongoing development pressure.
- That greater emphasis be placed on the protection of neighbourhood character elements which contribute to liveability and residential amenity.
- That the State Government provide support to Council's who develop policy approaches that protect liveability.
- That State Government agencies lead by example in ensuring consideration is given to all directions within the Melbourne 2030 strategy in the sale and development of surplus State-owned land.

Rationale:

- Ensure protection of liveability and neighbourhood character as a positive benefit of Melbourne 2030.

Direction 6: A fairer city

Housing Choice

Importance 4 ●●●●

Comment:

- Housing choice and diversity of dwelling types will become a key issue due to demographic changes (ageing population, smaller household sizes) and affordability constraints.
- There is need to encourage greater diversity in housing type, especially so that the housing stock provides housing choices to meet a diverse range of needs.
- The market has been slow to provide a diversity of housing in established Activity Centres or to provide a range of dwelling types as infill housing. For example in Boroondara there is very limited new construction of one and two bedroom dwellings.
- Melbourne 2030 assumes there is a ready market for high density dwellings located in Activity Centres, but there needs to be increased recognition that consumer preferences are likely to require well located infill and semi-detached dwellings. The provision of such housing will be critical in providing future housing choice.

Recommendation:

- Provide greater policy emphasis on housing choice and ensuring a greater diversity of dwelling types so that housing stock is responsive to demographic changes and affordability constraints.
- Review the assumption that Activity Centres are market ready locations for high density dwellings, and recognise that consumer preferences are likely to require well located, small-scale infill and semi-detached dwellings.
- That "low rise" housing solutions be promoted as part of Melbourne 2030, and that it be recognised that the role of "high rise" and "high density" housing provision is unlikely to be realised in most Activity Centres.

Rationale:

- Achieving housing choice and a greater diversity of dwelling type and size will require a range of policy initiatives and implementation measures.
- Recognition that consumer preferences for small-scale, infill and semi-detached dwellings rather than high density dwellings in Activity Centres.

Housing Affordability

Importance 3 ●●●

Comment:

- Housing affordability is a significant policy issue for State Government. There needs to be greater emphasis on defining policy and

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implementation approaches.

- There has been a failure to take a “whole of Government” approach to addressing housing affordability issues. For example, surplus State Government land assets located in Activity Centres which should have been used for the provision of affordable or social housing have been sold to achieve greatest financial return.
- There has been a failure by State Government to ensure provision of affordable or social housing as a component of major development proposals, for example, as part of the Tooronga Village site redevelopment or the development of the Kew Residential Services site.

Recommendation:

- That State Government undertake a “whole of Government” approach to implement Melbourne 2030 objectives in relation to housing affordability. For example, surplus land in Activity Centres should be used for residential purposes including the provision of affordable housing rather than being sold at highest market value.
- That a component of affordable or social housing be provided as part of major residential development projects. For example, the Tooronga Village and Kew Residential Services development projects were ideally suited to providing a component of affordable housing.
- That further policy development be undertaken to address housing affordability issues.

Rationale:

- A “whole of government” approach is required to achieve housing affordability objectives.

Direction 7: A greener city

Climate Change, Energy Consumption and Greenhouse Gas Emissions

Importance 4 ●●●●

Comment:

- Climate change is now a much more significant policy issue than when Melbourne 2030 was released.
- Greater leadership is required from the State Government on environmental sustainability.
- The sustainability of the city form is a key Melbourne 2030 consideration. Council has consistently advocated that development and land use outcomes must be environmentally sustainable.
- A properly integrated public transport system is critical to reducing greenhouse gas emissions.
- There is scope to promote greater Environmentally Sustainable Development (ESD) initiatives in new development. Assessment programs to ensure evaluation of ESD design features and reduce energy consumption should be widely promoted.

Recommendation:

- That the outcomes of Melbourne 2030 policy must be environmentally sustainable.
- That greater priority is to be given to ensuring a properly integrated public transport system because of the substantial environmental benefits to be derived from such a system.
- That there be a requirement for more stringent ESD initiatives to be met in new developments and that increased emphasis be placed on the evaluation of ESD design features in new developments.
- That state-wide minimum standards for environmentally sustainable design be introduced for residential and commercial development within the planning and building system.

Rationale:

- Responding to climate change and the management of environmental impacts of development will be critical to the success of Melbourne 2030.
- A properly integrated public transport system is a key factor in meeting sustainability objectives.
- Achievement of a more sustainable city can be achieved by improving the environmental performance of built form.
- ESD outcomes are critical to the successful implementation of Melbourne 2030.

Water Resource Management

Importance 4 ●●●●

Comment:

- Water conservation is a significant policy issue to emerge since the release of Melbourne 2030.
- Local Government has provided innovative responses to water conservation.
- Social impacts of water restrictions (e.g. limited use of recreation/ sporting facilities) need to be acknowledged in policy approaches.
- Water recycling and opportunities for collection of rainwater/stormwater require further investigation.

Recommendation:

- That water conservation policy be further developed to ensure proper account of the social impacts of water restrictions.
- That water recycling and opportunities for collection of rainwater and re-use of stormwater require further investigation.
- That assessment programs be prepared to require new developments to incorporate a high standard of water sensitive urban design and water conservation measures within the development.

Rationale:

- Infrastructure and service capacity are critical issues in implementing Melbourne 2030 objectives.

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- Water conservation and the adequacy of water supply are key issues in providing for increased levels of population growth.

Infrastructure Provision

Importance 5 ●●●●●

Comment:

- Infrastructure capacity is a clear constraint to growth in established areas. There is a need to ensure proper planning and upgrading of infrastructure to support increased populations and number of households.
- The capacity of infrastructure must be sufficient to support new development in Activity Centres.
- Detailed plans and costings for the upgrading of infrastructure and services must be prepared across agencies to ensure a co-ordinated approach to infrastructure provision is adopted.

Recommendation:

- State Government to provide increased investment in infrastructure to ensure the objectives of Melbourne 2030 can be implemented.
- Ensure infrastructure capacity is recognised as a constraint to development potential in established areas and some Activity Centres.
- Ensure detailed plans and costings for the upgrading of infrastructure and services are prepared across agencies to ensure a co-ordinated approach to infrastructure provision

Rationale:

- Better management of infrastructure constraints and co-ordinated improvement of infrastructure provision is required.

Biodiversity Protection and Canopy Vegetation

Importance 3 ●●●

Comment:

- There is a need to focus on biodiversity protection and the extent to which the implementation of Melbourne 2030 has impacted on biodiversity. For example, there needs to be proper evaluation of the impacts of Melbourne 2030 implementation on the protection of canopy vegetation.
- Greater emphasis needs to be given to measures to protect biodiversity and canopy vegetation in the long term.
- The extent to which development outcomes are environmentally responsible requires further evaluation so that likely long term impacts of incremental changes are understood.

Recommendation:

- Greater emphasis needs to be placed on the protection of biodiversity and canopy vegetation in Melbourne 2030 objectives and implementation strategies.
- Environmental impacts of development outcomes need to be further evaluated so that likely long term impacts of incremental changes are understood.

Rationale:

- Good environmental outcomes are critical to the success of Melbourne 2030 and further emphasis needs be given to strengthen measures to protect biodiversity and canopy vegetation in the long term.

Direction 8: Better transport links

Cycling and Pedestrian Movement

Importance 4 ●●●●

Comment:

- Sustainable transport options are a critical component of Melbourne 2030 implementation.
- There needs to be increased emphasis on detailed planning for pedestrian and cycle movement.
- Activity Centre planning needs to emphasise planning for pedestrian and cycle movements and to ensure this is taken into account when new development is occurring

Recommendation:

- That increased emphasis be placed on detailed planning for pedestrian and cycle movement, particularly in Activity Centres.

Rationale:

- To improve sustainable transport options.
- To recognise the importance of planning for bicycle and pedestrian movement, especially in Activity Centre development.

Integrated Public Transport

Importance 5 ●●●●●

Comment:

- The provision of a well integrated transport system is critical to the achievement of Melbourne 2030 objectives. Priority should be

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given to improving transport infrastructure and to targeted improvement programs. It is widely perceived that improvements to the public transport system are lagging well behind consumer demand. The lack of substantial improvement to public transport infrastructure is a constraint to the implementation of Melbourne 2030 objectives.

- There has been an uncertain and disjointed approach to successfully integrating transport and movement with land use planning initiatives.
- There is little evidence of improved integration of public transport in Principal and Major Activity Centres.
- Increased priority should be given to upgrading the Principal Public Transport Network. For Boroondara a key initiative is the upgrade of the Tram 109 route and the extension of Tram 48 along Doncaster Road to Doncaster.

Recommendation:

- That priority be given to provision of a well integrated transport system, particularly for Activity Centres.
- That transport and land use planning be integrated in planning for metropolitan development.
- That within Boroondara, priority be given to completing implementation of the Tram 109 upgrade project and undertaking the extension of the Tram 48 route to Doncaster.

Rationale:

- Integrating public transport will assist in achieving the 20/2020 target.

Car Parking in Activity Centres

Importance 4 ●●●●

Comment:

- There is a need to ensure traffic and parking demand generated by increased floor space in Activity Centres can be accommodated.
- Existing parking policies and the VPP car parking provisions are not achieving Melbourne 2030 objectives in Activity Centres.
- Given the inadequacy of the public transport network, reduction in car parking requirements for new development can not be justified.
- Additional development in Activity Centres needs to consider traffic generation, existing traffic congestion, environmental pollution and the safety of surrounding residential streets.

Recommendation:

- Ensure total transport impacts of new development are analysed, including car parking provision, traffic generation, existing traffic congestion, environmental pollution and the safety of surrounding residential streets.
- Evaluation of alternative approaches to manage car parking provisions in Principal and Major Activity Centres is required

Rationale:

- The need to ensure new development in Activity Centres makes adequate provision for car parking.
- The need to ensure that cars are not favoured over public transport in Principal and Major Activity Centres.

2020 Public Transport Target

Importance 4 ●●●●

Comment:

- Public Transport targets are a long way from being met.
- There is a need for the State Government to provide more confidence to Local Government that the 20/2020 target will be met.
- There is a need for State Government commitment to a long term, funded transport strategy to support the principles of Melbourne 2030.
- Melbourne 2030's 20/2020 target is strongly supported but will require an increased shift of funding resources to improve public transport infrastructure and service delivery. A more 'holistic' approach is required to transport strategies and implementation programs.
- Public transport improvement will assist in achieving liveability objectives.
- Specific attention is also required to improving the following:
 - o Local public transport services;
 - o Connections between public transport modes;
 - o Cross-town routes and public transport provision; and
 - o School transport.
- Improvements to public transport in the vicinity of key redevelopment sites (KRS/Tooronga Village).

Recommendation:

- A long term, funded public transport strategy is required to support the principles of Melbourne 2030.
- A clear implementation plan for the improvement of public transport infrastructure and service delivery is required to ensure the achievement of the 20/2020 target.
- Increased emphasis is to be placed on public transport improvement to assist in the delivery of Melbourne 2030 liveability outcomes.

Rationale:

- Ensure public transport infrastructure and service delivery is upgraded to achieve the 20/2020 target set in Melbourne 2030.

Direction 9: Better planning decisions, careful management

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Performance of the Department of Planning and Community Development

Importance 3 ●●●

Comment:

- The performance of the Department of Planning and Community Development is critical to the implementation of Melbourne 2030 and to supporting Local Government implement Melbourne 2030 objectives.
- There is a need to avoid delays in responding to correspondence, progressing amendment requests and approving amendments.
- There is a need for stronger support for Local Government implementation initiatives (e.g. Residential 3 Zone; Interim Structure plan controls).
- There is a need for stronger leadership and guidance by the Department of Planning and Community Development (e.g. introduction of permanent height controls for Neighbourhood Activity centres).

Recommendation:

- That the Department of Planning and Community Development take a stronger leadership role in supporting Local Government and ensuring that processes are responsive to the needs of individual Local Governments.

Rationale:

- Improved performance will foster better working relationships between State and Local Government.

Statutory Controls

Importance 5 ●●●●●

Comment:

- Much is expected from Melbourne 2030 (for example, in relation to consolidation, Activity Centre development etc), but the range of statutory implementation tools is narrow and constrained by the VPP format of planning schemes and the desire for a high level of consistency between municipal planning controls.
- The role of Local Policy should be strengthened, and VCAT should apply rather than consider Local Policy.
- Planning scheme controls need to provide greater certainty and transparency. There needs to be less emphasis on consistency and greater emphasis on ensuring local responses can be implemented.
- Planning scheme controls should provide for a greater level of prescription (for example, in relation to building height, setbacks, open space etc.) to ensure greater certainty of outcome and to provide the community with clearly understood parameters for development.

Recommendation:

- Review the statutory tools available to Councils so that they are responsive to the local delivery of Melbourne 2030 outcomes (particularly the implementation of Structure Plans).
- Expand the suite of VPP tools and ensure that greater emphasis is given to using tools which will protect liveability and neighbourhood character, enhance urban design and promote heritage conservation rather than focusing only on those tools which promote intensification of development.
- Review the operation of the Design and Development Overlay and Development Plan Overlay provisions to ensure that these provisions can be easily and clearly utilised for delivering Melbourne 2030 and Structure Plan outcomes.
- Allow increased local variation in planning controls so that local strategies can be implemented.
- Ensure that initiatives to implement Melbourne 2030 are useful to local government and that implementation will be actively supported by the Department of Planning and Community Development.
- Provide for increased certainty in planning controls, including greater levels of prescription in relation to built form outcomes and open space provision.
- Strengthen the role of Local Policy and ensure a consistent approach to the interpretation of Local Policy in VCAT.
- Review the State Planning Policy Framework and Clause 12 of Planning Schemes.

Rationale:

- Strengthen the ability of planning schemes to introduce locally appropriate responses to the implementation of Melbourne 2030.
- Ensure greater transparency and certainty in planning control.
- Balance implementation of liveability objectives with intensification of development objectives.

Partnership Approaches

Importance 5 ●●●●●

Comment:

- The implementation of Melbourne 2030 is dependent upon an effective partnership between State Government and Local Government. The State Government must provide leadership, resources and tools to support Local Government delivery of Melbourne 2030 outcomes.
- The current implementation approach is very “top-down” and there is a need for State agencies to properly acknowledge local variations and local issues which require different strategies and responses.

Recommendation:

- That the State Government enter into meaningful partnership arrangements with Local Government to facilitate implementation of

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Melbourne 2030.

- That ongoing funding be made available to assist Councils in the implementation of Melbourne 2030 initiatives.

Rationale:

- To strengthen working relationships between State and Local Governments to deliver Melbourne 2030 implementation.

Data and Monitoring of Melbourne 2030

Importance 3 ●●●

Comment:

- There is need to ensure key indicators and publicly available benchmarks are developed which measure Melbourne 2030 implementation. There is little available data about the extent to which Melbourne 2030 policy objectives are being achieved

Recommendation:

- That empirical evidence which measures the implementation of Melbourne 2030 be developed.
- That a series of key indicators and benchmarks to assist in measuring and determining the effectiveness of Melbourne 2030 locally be prepared.

Rationale:

- To assist in understanding if desired outcomes of Melbourne 2030 are being achieved.

Cutting Red Tape

Importance 3 ●●●

Comment:

- Initiatives to improve planning systems need to be more responsive to Local Government processes and requirements.

Recommendation:

- That the implementation of “Cutting Red Tape” initiatives be reviewed to ensure proper collaboration with Local Government and that changes to the planning system are responsive to Local Government requirements.

Rationale:

- Ensure that the future planning system is more responsive to Local Government requirements.

Whole of Government Approach

Importance 5 ●●●●●

Comment:

- Melbourne 2030 implementation is constrained by State Government resource allocation.
- There is a need to identify Melbourne 2030 initiatives that could be progressed through additional funding and to establish clear implementation priorities based on funding commitments.
- There is a need to strengthen a “whole of government” approach to resource allocation, particularly in relation to transport, infrastructure and Activity Centres.
- Government agencies need to pursue implementation of Melbourne 2030 policy. For example, opportunities to use surplus public land for affordable housing provision or other community facility development, should be pursued in preference to achieving the highest financial return by sale on the open market.

Recommendation:

- That Melbourne 2030 implementation be properly resourced by State Government and that funding models be reviewed.
- That priority be given to funding in relation to transport, infrastructure and implementation of Activity Centre Structure Plans.
- That the “whole of Government” approach to implementing Melbourne 2030 be strengthened.

Rationale:

- To ensure appropriate resource allocation to implement Melbourne 2030.

Community Perceptions and Acceptance of Melbourne 2030

Importance 4 ●●●●

Comment:

- Community acceptance of Melbourne 2030 is low and has been damaged by excessive “top-down” approaches to implementation.
- There is an urgent need to demonstrate positive outcomes of Melbourne 2030 and to ensure that Melbourne 2030 is not used only to promote intensification of development outcomes.
- When Melbourne 2030 is used as a basis for justifying changes in Activity Centres, there is a need to ensure that all benefits are delivered (for example open space, urban design and transport benefits) as well as the introduction of new built form and more intensive uses.

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Recommendation:

- That measures to improve community acceptance of Melbourne 2030 be considered, including changes to implementation approaches.
- That Melbourne 2030 be used to deliver positive community benefits (including open space in established Activity Centres and improved public transport) and not merely to advocate solely for the intensification of development outcomes.

Rationale:

- Build community acceptance of Melbourne 2030 implementation initiatives.

Priority Development Panel (PDP)

Importance 4 ●●●●

Comment:

- The PDP was established in October 2004, along with the introduction of the Priority Development Zone.
- The practice of appointing PDPs prejudices the ability of Local Government to fulfil its role as Planning Authority.
- The PDP has been inappropriately used to take away the ability of Councils to make decisions about developments that are not of State or Regional significance.
- The PDP has also been inappropriately used to facilitate development proposals in Activity Centres ahead of the completion of Structure Plans.
- Council has previously raised concerns about the operation of the PDP, particularly in terms of the PDP process lacking openness, transparency and public accountability.

Recommendation:

- That the PDP only be appointed at the request of the relevant Local Government.
- That the Terms of Reference for the operation of the PDP be reviewed to ensure greater levels of transparency and openness.

Rationale:

- There is a need to support the role of Council as Planning Authority.
- Ensure improvements to the operation of the PDP.

Assessment of State/Regional Significance

Importance 4 ●●●●

Comment:

- State Government intervention in planning matters before Council is occurring in relation to matters which are not considered to be of State or Regional significance. This undermines the ability of Councils to act as Planning and Responsible Authorities and to represent the community they are responsible for. This intervention does not assist in building community support for Melbourne 2030.
- Processes relating to interventions and the assessment of State/Regional significance lack transparency.

Recommendation:

- That Melbourne 2030 not be used as the basis for justifying intervention in planning matters which are not considered to be of State or Regional significance.

Rationale:

- Support the role of Council as democratically elected Planning and Responsible Authority is paramount.
- Support transparent governance and management of metropolitan development.

Your Organisation's Comments

Background - Council Position

Comment:

Council has previously noted that the core directions of Melbourne 2030 – to create a 'More Compact City' and to ensure that Melbourne is 'A Great Place to Live' are potentially in conflict with one another. It is considered that the implementation emphasis of Melbourne 2030 is on urban consolidation and accommodating Melbourne's predicted household growth within the defined Urban Growth Boundary. Council has previously stated that the principle strategy to increase residential densities in and around Activity Centres must be achieved in balance with, and not at the expense of, the equally important (but less emphasised) strategy objectives which promote enhanced liveability, environmental sustainability, and the protection of cultural identity and heritage assets.

Council has previously noted with concern that the growth and change aspects of Melbourne 2030 have lead to planning decisions which emphasise the need for urban consolidation, rather than the need to protect the amenity of existing residents and visitors to Boroondara.

In summary, the key implementation concerns which Council raised in its initial submissions regarding Melbourne 2030 included:

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- Whilst Council supported the strategic principles contained in Melbourne 2030, it did not support the use of population projections as the basis for making planning decisions about the future sustainable form of Melbourne.
- Council supported the policy position of Urban Growth Boundaries and Green Wedges. It also supports urban consolidation in outer and fringe urban areas and the application of Ecologically Sustainable Development Principles to the consolidated growth in the existing urban areas.
- Council sought more detailed analysis of matters such as physical infrastructure capacity, character and liveability to determine the capacity to accommodate growth. The proposed strategy did not provide the level of analysis to support either the desirability of seeking to accommodate projected levels of growth or the capacity of the metropolitan area to absorb the levels proposed.
- Council stated that insufficient information had been provided in the strategy about how consolidation would be encouraged across the whole of the metropolitan area; and
- Council considered that there was an uncertain and disjointed approach to successfully integrating transport and movement within the land use planning initiatives contained in Melbourne 2030.

Since the time of the initial submission, Council has continued to raise concerns about the implementation of Melbourne 2030. In particular:

- A key area of concern for Council has been the way in which Melbourne 2030 has been used as a basis to support the intensification for development (under the 'more compact city' direction) without having sufficient regard to matters such as liveability, neighbourhood character, heritage and design outcomes (under the 'great place to be' direction).
- A number of inadequacies have been identified in specific implementation measures. For instance, interim structure planning controls were of little benefit to Council as, in common with many other Councils, it had not been possible to achieve the level of structure planning work needed to satisfy the requirements for the introduction of interim controls;
- The Department of Planning and Community Development would not support the introduction of the Residential 3 Zone in the form requested by Council;
- Proposals to develop a number of key sites have occurred in advance of the completion of Structure Plan work; and
- Council has also raised concerns about the involvement of the Priority Development Panel (PDP) and the process used by the PDP, including the lack of openness, transparency and public accountability in its decision-making.

Melbourne 2030 has also been used to provide policy support for decisions to move planning control for key redevelopment sites (such as the Kew Residential Services site and Tooronga Village) away from Council to the State Government.

Executive Summary

The Council of the City of Boroondara seeks to bring to the attention of the Audit Expert Group the following matters in relation to the implementation of Melbourne 2030.

Council supports the strategic principles which underpin the Melbourne 2030 policy. In particular Council has supported the introduction of the Urban Growth boundary and Green Wedge policy, as well as the Environmentally Sensitive Development (ESD) principles which underpin some of the key directions of Melbourne 2030. Council does not support use of population projections to determine growth targets, and has previously raised concern over the lack of analysis and lack of policy implementation detail contained in the Strategy. These concerns remain.

Council is concerned that Melbourne 2030 has been used to support the intensification of development (under the 'more compact city' direction) without the implementation of liveability improvements and the protection of valued character attributes of established suburbs (under 'the great place to be' direction). Council has also expressed concern about specific measures intended to implement Melbourne 2030 (The Residential 3 Zone, Interim Structure Plan Controls, Height Controls for Neighbourhood Centres and the operation of the Priority Development Panel).

There are a number of matters raised in Council's submission which are central to improving the implementation of Melbourne 2030. These are listed below:-

Activity Centres

- Differences in Activity centre types and functions are not reflected in the current policy or implementation approaches.
- Constraints to growth need to be recognised (capacity to accommodate new development, heritage built form, infrastructure capacity, congestion, and residential interfaces).
- Structure Plan implementation and the arrangements for giving Structure Plans statutory force need to be reviewed.
- The process for managing the development of key sites prior to Structure Plan completion requires review.
- Review 'Out of Centre' development controls to ensure policy objectives are being met.
- Review policy impacts on Neighbourhood Activity Centres, acknowledging the diversity in type and functions of these centres.
- Strengthen built form controls for Neighbourhood Activity Centres.

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Protecting Liveability

- Melbourne 2030 should not just be about intensification (the 'more compact city' direction). Council is seeking greater emphasis on implementing measures to positively improve liveability (the 'great place to be' direction).
- A stronger emphasis on protection of the valued character of existing suburbs is required (heritage, neighbourhood character, maintaining residential amenity, managing the residential interfaces with Activity Centres).
- Council considers that improved urban design outcomes are required and suggests greater use of Urban Design Frameworks to manage development of key sites.
- Housing affordability and housing choice are key policy issues – Council considers there is a need to increase the diversity in dwelling size and type; and to review approaches to housing development in Activity Centres.

Statutory Control

- There is need to strengthen the role of local policy, and ensure that VCAT is required to apply local policy.
- Council seeks greater flexibility in the suite of VPP controls (eg. in relation to Activity Centres)
- Statutory controls need to be more responsive to implementation of local strategies and approaches.
- Measures to protect liveability (eg. Neighbourhood Character Overlays etc.) must be given greater priority.
- More flexibility is required to allow greater local variation in controls.
- Greater prescription in statutory controls is required to provide increased certainty of planning outcomes (building height, setbacks and open space).
- There is a need to review residential development controls to ensure the framework is responsive to implementing local housing strategies and allowing greater local variations to controls.

Sustainability

- The response to climate change and environmental impacts of development need to be strengthened.
- Public Transport deserves higher priority. There is a need for clear implementation plans and funding to upgrade the Principal Public Transport Network.
- State Government must ensure that the 20/2020 public transport target will be achieved.
- Water resource management is a key priority and there should be greater recognition of the social impacts arising from water policy.
- Infrastructure capacity must be addressed, requiring increased funding for the upgrading of infrastructure.
- Further standards are required to achieve Environmentally Sustainable Development outcomes for residential and commercial development.

Implementation Arrangements

- Existing implementation is excessively 'top down'.
 - Ensure a "whole of government" approach to implementation.
 - Department of Planning and Community Development needs to show greater leadership in supporting local government.
 - The Department of Planning and Community Development needs to build meaningful partnerships with local government.
 - There is need for greater flexibility to implement local initiatives which implement Melbourne 2030 policy.
 - The operation of the Priority Development Panel should only occur at the request of local government and procedures should be reviewed to achieve greater transparency and openness.
 - The planning process needs to be responsive to the needs of individual local governments and allow for local strategies and greater local variation in statutory control frameworks.
 - There is a need for State Government to substantially increase funding and resources for implementation of Melbourne 2030.
-