



10.2 COUNCIL SUBMISSION TO THE DRAFT INNER METRO LAND USE FRAMEWORK PLAN

EXECUTIVE MEMBER: KYLIE BENNETTS, GENERAL MANAGER, CITY GROWTH AND ORGANISATIONAL CAPABILITY

**PREPARED BY: SHELLEY BENNETT, PRINCIPAL STRATEGIC PLANNER
KATHRYN POUND, ACTING MANAGER CITY STRATEGY, DESIGN AND SUSTAINABILITY**

1. PURPOSE

1.1 To seek endorsement of the submission (**Attachment 2**) to the draft Inner Metro Land Use Framework Plan.

2. EXECUTIVE SUMMARY

- 2.1 The Department of Environment, Land, Water and Planning (DELWP) have released the draft Inner Metro Land Use Framework Plan (IMLUFP) for public consultation until 24 October 2021. Refer **Attachment 1** for the summary document. The full plan can be viewed at <https://engage.vic.gov.au/mfopf/inner-metro-lufp>.
- 2.2 The draft IMLUFP is a long term, 30-year strategic land use and infrastructure plan that will guide future planning and growth within the region (comprising three local government areas – the City of Port Phillip, the City of Melbourne and Yarra City Council). It seeks to provide guidance on how to:
- Shape population and employment growth
 - Inform service and infrastructure development
 - Guide public and private investment
 - Protect the distinctive and historic characteristics of the Inner Metro region
 - Improve environmental resilience
- 2.3 Ultimately, DELWP intend to use the final IMLUFP to inform the drafting of new Regional Policy for the Port Phillip Planning Scheme. A future VC planning scheme amendment will implement this into the Planning Scheme.
- 2.4 Council officers have prepared a submission to the draft IMLUFP (**Attachment 2**).
- 2.5 The submission provides broad support for the draft IMLUFP and also identifies a number of requested changes, in particular to the Productivity, Housing Choice and Sustainability and Resilience Chapters.
- 2.6 The submission also raises concerns around the implementation of the draft IMLUFP. The concern is that the 5-year action program and the translation of the IMLUFP into regional policy in the Port Phillip Planning Scheme are unlikely to be able to achieve all of the directions and strategies. We consider that further actions are added (including beyond the 5 years) to fill the gaps. We also request that DELWP engage with Council officers in a meaningful way early in the drafting of the planning scheme amendment that seeks to implement the draft IMLUFP.



- 2.7 Three actions within the draft IMLUFP 5-year action program nominate Council as a lead agency. These actions largely align with Council's existing work program and are unlikely to result in further resource demands from officers.

3. RECOMMENDATION

That Council:

- 3.1 Endorses a submission on the draft Inner Metro Land Use Framework Plan, contained at **Attachment 2** and delegates to the Chief Executive Officer the ability to make minor changes to the document that do not materially alter its intent.
- 3.2 Endorses the Chief Executive Officer (or delegate) providing the submission to DELWP as Council's official response to the draft Inner Metro Land Use Framework Plan public consultation process.

4. KEY POINTS/ISSUES

- 4.1 The Inner Metro Land Use Framework Plan (IMLUFP) is a long term, 30-year strategic land use and infrastructure plan that will guide future planning and growth.
- 4.2 Action 1 of Plan Melbourne 2017-2050 (Plan Melbourne)'s 5-year implementation plan required the development of 6 separate LUFs for each of Melbourne's metropolitan regions.
- 4.3 The local government areas of the City of Port Phillip, the City of Melbourne and Yarra City Council comprise the inner metro region.
- 4.4 The IMLUFP introduces a regional approach to implement Plan Melbourne and is intended to provide clearer direction on where future growth should be directed, achieve better balance between jobs and population growth and provide a basis for collaboration with (and between) state and local government.
- 4.5 DELWP hopes the IMLUFP process will better align state and local planning and the development of local planning strategies over the next five years.
- 4.6 The IMLUFP builds on existing work at the state, regional and local level and is intended to identify gaps in strategic planning for future action by local and state government. The Plan includes:
- A land use framework identifying state-significant and regionally-significant places that will be a focus for investment, growth and planning.
 - A vision and 2050 spatial plan providing an overview of the key land-use planning concepts. The spatial plans show the major strategies already established by Plan Melbourne and existing and proposed strategies that contribute to long-term planning for the metropolitan Melbourne and the delivery of Plan Melbourne.
 - A strategic framework including strategic directions and a spatial plan for each thematic chapter which illustrates the land-use strategies. Thematic chapters include Productivity, Housing Choice, Integrated Transport, Liveability, Strong Communities and Sustainability and Resilience.
 - A five-year action program for State and local governments to give effect to the strategic directions of the land-use framework plan and in turn, Plan Melbourne. Council is identified as the lead agency for three actions (Actions 1, 3 and 10).



- 4.7 Ultimately, DELWP intend to use the final IMLUFP to inform the drafting of Regional Policy for the Port Phillip Planning Scheme. A future VC planning scheme amendment will implement this into the Planning Scheme. VC planning scheme amendments are administrative amendments prepared by the state that are implemented without exhibition or panel processes.
- 4.8 Council officers have prepared a submission to the draft IMLUFP (see Attachment 2).
- 4.9 Throughout the development of the draft IMLUFP, Council officers have been asked to provide feedback to DELWP. Some of this feedback has been incorporated however there are still some outstanding issues. The submission prepared by Council officers in Attachment 2 is consistent with previous officer advice to DELWP.
- 4.10 The submission provides broad support for the draft IMLUFP and also identifies a number of requested changes, in particular to the Productivity, Housing Choice and Sustainability and Resilience Chapters. Key changes requested include:
- Increased emphasis on the economic role of the Capital City Zone (CCZ) Fishermans Bend precincts within CoPP, at least equal to that placed on the Fishermans Bend NEIC (employment precinct). The IMLUFP should recognise the economic role of the CCZ precincts in their own right (not just as supporting the NEIC) and focus on facilitating the delivery of these jobs, including by committing to the early delivery of public transport (rail and fixed rail).
 - Recognise the need for a more nuanced approach to directing housing growth in the inner metro region that not only considers proximity to major activity centres, but that also considers the large extent of heritage overlays, proximity to public transport and built form/public realm outcomes.
 - Address the need for planning mechanisms to contribute to increasing the supply of affordable housing in the region, to meet the large need (which includes social housing, affordable housing and homelessness).
 - Better reflect the specific inner-city context of the region and address issues such as zero emissions by 2050 at the latest, the challenge of rising groundwater in low-lying urban areas, the circular economy, water availability and drought, renewable energy and higher ESD standards.
- 4.11 The primary concern at this stage is around the implementation of the draft IMLUFP. The concern is that the 5-year action along with the translation of the IMLUFP into the Port Phillip Planning Scheme via regional policy will not ensure all of the Directions and Strategies are achieved.
- 4.12 The submission suggests that both further actions are added beyond the 5-years to fill the gaps, and that further clarity is provided in the IMLUFP on the planning mechanisms that are available to deliver strategies.
- 4.13 The draft IMLUFP includes three actions where Council is nominated as the lead agency:
- Action 1: Identify precincts and opportunities where new commercial land can be supplied which can help to accommodate future needs. This may include intensification of commercial uses within existing commercial zoned land, or the rezoning of existing land for commercial uses.



- Action 3: Update planning schemes to align with housing policies in Plan Melbourne and the Inner Metro Region Land Use Framework Plan and the implementation of the reformed residential zones. This includes providing capacity for 15 years of regional housing supply focusing on locations identified for housing growth in the LUF. This may require strategic planning work to support these changes such as preparing or updating local housing strategies or preparing structure plans to further investigate where increased densities can be supported, and determine specific changes required to planning schemes.
- Action 10: Identify non-residential land where additional canopy trees can be planted to offset vegetation removal.

- 4.14 These actions align with Council's existing work program and are unlikely to result in further resource demands from officers.
- 4.15 Council officers have commenced preparing the South Melbourne Structure Plan and a municipal-wide Spatial Employment and Economic Framework (aligned with Action 1).
- 4.16 Council has also committed to the preparation of a new municipal Housing Strategy as part of its new Council Plan 2021-2031 (aligned with Action 3).
- 4.17 Council's Greening Port Phillip Strategy identifies where canopy cover can be increased on CoPP owned/managed public space and streets (aligned with Action 10). There are many state government departments and agencies that also have a responsibility to manage land in this area (VicRoads, Parks Vic, VicTrack), who should be included as delivering on this action.
- 4.18 The submission also raises concerns around the implementation of the draft IMLUFP into the Port Phillip Planning Scheme via its translation into regional policy, and requests that DELWP engage with Council officers in a meaningful way early in the drafting of the planning scheme amendment that seeks to implement the draft IMLUFP.

5. CONSULTATION AND STAKEHOLDERS

- 5.1 Throughout the development of the draft IMLUFP, Council officers have been asked to provide feedback to DELWP. Some of this feedback has been incorporated and there are still some outstanding issues. The submission is consistent with previous officer advice to DELWP.
- 5.2 DELWP have released the draft IMLUFP for public consultation until Sunday 24 October 2021. This includes an online community information session, and the ability to provide feedback via a short survey, a detailed survey and/or a submission.
- 5.3 Council officers have prepared a written submission to the draft IMLUFP, which Council is being asked to endorse so that it can be submitted to DELWP.
- 5.4 In preparing the submission, Strategic planning officers have consulted with officers from Council's sustainability, design, affordable housing, transport and statutory planning teams.

6. LEGAL AND RISK IMPLICATIONS

- 6.1 No significant legal or risk implications have been identified. The draft IMLUFP nominates Council as the lead agency for 3 actions. These actions align with Council's existing work program and are unlikely to result in further resource demands from officers.



FINANCIAL IMPACT

- 6.2 No additional financial impact has been identified. The draft IMLUFP nominates Council as the lead agency for 3 actions. These actions align with Council's existing work program and are unlikely to result in further project funding.

7. ENVIRONMENTAL IMPACT

- 7.1 The draft IMLUFP vision is for the inner metro region to be a world leader in urban environmental sustainability. It includes a range of directions and strategies to assist in managing urban heat, increase canopy cover, implement integrated water management, protect landscapes and biodiversity, manage the impact and risk of coastal inundation and design urban renewal precincts to support zero emissions and climate resilient urban areas.

8. COMMUNITY IMPACT

- 8.1 The draft IMLUFP is a long term (30-year) strategic land use and infrastructure plan that will provide clearer direction on where future growth should be directed and guide the future planning of the inner metro region. It seeks to achieve a better balance between jobs and population growth and to ensure the liveability, affordability and sustainability of the region long term to cater for the diverse needs of the community.
- 8.2 The draft IMLUFP vision is for the inner metro region to be recognised globally as an exemplar urban environment with its liveable and affordable places. It includes a range of directions and strategies to draw on the region's culture and heritage, strengthen the network of open spaces and trail connections, create great streets and public spaces, plan for major social infrastructure, deliver state-significant health and education services and strengthen the network of 20-minute neighbourhoods. It also seeks to increase the supply of social and affordable housing.

9. ALIGNMENT TO COUNCIL PLAN AND COUNCIL POLICY

- 9.1 The draft IMLUFP is a long term, 30-year strategic land use and infrastructure plan prepared by the State Government that will guide future planning and growth within the region (comprising three local government areas – the City of Port Phillip, the City of Melbourne and Yarra City Council).
- 9.2 The directions and strategies in the draft IMLUFP are largely aligned with the Council Plan, and in particular Strategic Direction 2 – Liveable Port Phillip, Strategic Direction 3 – Sustainable Port Phillip and Strategic Direction 4 – Vibrant Port Phillip.

10. IMPLEMENTATION STRATEGY

TIMELINE

- 10.1 DELWP have released the draft IMLUFP for public consultation until Sunday 24 October 2021.
- 10.2 If Councillors endorse the submission, it will be provided to DELWP as Council's formal response to the public consultation.
- 10.3 Following the consultation period, DELWP will collate and analyse all feedback with a summary of the feedback shared on the Engage Victoria website.
- 10.4 The Minister for Planning will consider all feedback prior to the finalisation of the Land Use Framework Plans in early 2022.



- 10.5 Subsequently, State Government will draft new Regional Policy for the Port Phillip Planning Scheme based on the plan. They will implement this into the scheme through a VC planning scheme amendment.
- 10.6 The implementation of other parts of the draft IMLUF are not clearly explained or provided with a timeframe within the document (this has been raised as a concern within the submission).

COMMUNICATION

- 10.7 DELWP will continue to inform Council of the progress of the IMLUFP.

11. OFFICER DIRECT OR INDIRECT INTEREST

- 11.1 No officers involved in the preparation of this report have any material or general interest in the matter.

ATTACHMENTS

- 1. Attachment 1 - Draft Inner Metro Land Use Framework Plan Summary Document**
- 2. Attachment 2 - CoPP Submission to DELWP Draft IMLUFP Draft**