

CITY OF PORT PHILLIP FEEDBACK ON DRAFT INNER METRO LAND USE FRAMEWORK PLAN

The City of Port Phillip (CoPP) is pleased to provide feedback on the draft Inner Metro Land Use Framework Plan (IMLUFP). The preparation of this feedback has involved officers from City Strategy, City Policy, Transport Choices, Sustainability Policy and Community Building and Inclusion teams. It has also been reviewed and endorsed by Council's Executive Leadership Team (ELT) and Councillors.

We acknowledge the benefits of taking a regional approach to planning for the inner metro region to ensure the strategic importance of the region is recognised and key aspirations are realised. In many ways, the inner metro region is unique when compared to other regions, and it is pleasing to see the draft IMLUFP seek to consider in detail the inner-city context, the urban structure and land use across the three Councils. The draft IMLUFP directions and strategies are generally consistent with Council's vision and many of our aspirations for the City of Port Phillip, as expressed in the Council Plan.

While Council is generally supportive of the draft IMLUFP, we request some key changes to the productivity, housing choice and sustainability and resilience sections. An overview of these changes is provided below, with more detailed comments provided in Attachment I.

Our primary concern at this stage is around the implementation of the draft IMLUFP. We are concerned 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. We suggest further actions are added 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.

Chapter 04 – Productivity

Increased emphasis is needed on the economic role of the Fishermans Bend Urban Renewal Area Capital City Zoned precincts

Council is concerned that the draft IMLUFP provides much more emphasis on facilitating the delivery of jobs in the Fishermans Bend NEIC (Employment Precinct) than within the four Capital City Zoned (CCZ) precincts (three of which are within CoPP – Sandridge, Montague and Wirraway), even though both areas are planned to deliver 40,000 jobs (a total of 80,000 jobs).

The draft IMLUFP seems to describe the economic role of the CCZ precincts in subordinate terms relative to the NEIC. The economic logic behind this is unclear in its relationship to the ambitions for the CCZ precincts as outlined in the Fishermans Bend Framework, DELWP, 2018 ('The Framework'). The economic role of the CCZ precincts in The Framework is substantially more than simply to '*provide adequate land for employment purposes which complement or service the adjacent Fishermans Bend NEIC*' as described in Strategy 23, Direction 6 of the draft IMLUFP.

The Framework envisages the CCZ precincts as an extension of the CBD, each with their own core area. Sandridge is of particular importance in relation to jobs delivery, with a target of 26,000 jobs, the highest density of jobs of any precinct and a vision as '*one of Melbourne's premium office and commercial centres, balanced with diverse housing and retail*' (the Framework). The "complement or service" strategy in the draft IMLUFP is likely to be inconsistent with achieving the outcomes envisaged in the Framework.

To achieve the vision and outcomes outlined in the Framework for the CCZ precincts, significant strategic focus, investment and facilitation is required from the State Government. At present it appears the draft IMLUFP may be being informed by the current focus areas and investments of State Government in the Fishermans Bend NEIC. Given half of all employment targets and all of the residential population will be provided by the CCZ precincts, this presents significant strategic risk realisation of benefits from the Fishermans Bend Urban Renewal Area as a whole.

A key part of delivering the CCZ precincts is a commitment to the short-term delivery of new public transport (rail and light rail) in Fishermans Bend as well as upgrades to the existing tram route (route 109). This is not currently included in the IMLUFP, which shows 'investigation areas' for light rail and heavy rail and does not mention upgrade of the existing tram.

A lack of early delivery of public transport will likely compromise the envisaged land use mix (in particular the number and type of jobs delivered), as well as delivering sub-standard built form and public realm outcomes (i.e. increased above ground podium car parking) that are inconsistent with the outcomes envisaged in the Framework. If this occurs, there will likely be effectively irreversible implications for the economic future of the affected precincts. Given the CCZ precincts are planned provide half the jobs and all of the residential population, a failure of the CCZ precincts would amount to a failure of the urban renewal area as a whole. It would also limit supply chain integration with key employment clusters south of the Yarra, in precincts such as South Melbourne and Cremorne, limiting the multiplier factors associated with government investment in the Fishermans Bend NEIC.

Strategy 12 'Provide public transport connections to Fishermans Bend NIEIC (and major urban renewal precinct) to support investment and support future employment and population needs' is recognised as critical to the success of the urban renewal area as a whole. Doing so in a timely fashion will lead to very different quality, density and types of development, particularly given competition from better serviced precincts such as Arden Macaulay.

Council requests that the IMLUFP productivity section be amended to provide an elevated role to the economic importance of the Fishermans Bend CCZ precincts (similar to that afforded the Fishermans Bend NEIC). This should address facilitation of jobs delivery together with commitments to early public transport delivery and upgrades of the existing tram route. This could be achieved through amending Direction 3 (relating to the Parkville and Fishermans Bend NEICs) to include the Fishermans Bend CCZ precincts (Strategy 12 relating to public transport connections already refers to the urban renewal areas), or expanding Direction 6 (relating to the design and amenity of urban renewal areas) to focus on the facilitation of jobs and early delivery of public transport (rail and light rail). The inclusion of action/s relating to early delivery of public transport should also be considered.

Further detailed comments on the productivity chapter are included in the implementation section below and in Attachment 1.

Chapter 05 – Housing Choice

Council has committed to the preparation of a new municipal Housing Strategy as part of its new Council Plan 2021-2031. As per Action 3, Council's new Housing Strategy will need to align with the IMLUFP (as well as Plan Melbourne and the new residential zones).

The Housing Choice directions are generally supported, with the intent to increase the supply of housing to match the needs of the growing and changing population (direction 8), providing greater housing choice and diversity (direction 9) and increasing the supply of social and affordable housing (direction 10).

The key changes Council would like to see relate to ensuring the increase in housing supply (direction 8) properly considers the inner metro context (including extensive heritage controls), and the increase supply of affordable and social housing (direction 10) includes the role of planning mechanisms to deliver additional supply.

Increasing housing supply in the inner metro region (direction 8)

Map 3 - Inner Metro Region housing choice 2050 shows residential land within 800m walking distance of major activity centres (MACs) as land 'suitable for medium- and higher-density housing, subject to the provisions of any local council planning scheme or adopted municipal housing strategy'. Given the large amount of Heritage Overlays within the City of Port Phillip (and particularly within MACs), directing housing growth within CoPP is much more nuanced than simply areas within 800m walking distance of MACs. We understand this is also true for Yarra, who have similar shopping strip activity centres. Along with the extensive heritage controls, proximity to public transport, desired built form and urban design outcomes are also key considerations. CoPP has two precincts (St Kilda Road North and St Kilda Road South), referred to as 'housing opportunity areas' in Table 11 of the IMLUFP, which are not activity centres or urban renewal precincts (Fishermans Bend), but which do provide for significant housing growth.

Direction 8 and the related strategies should recognize the particular inner-city context in planning for housing growth (including the extensive heritage overlays) and should also refer to the housing opportunity areas (which are not currently referred to in the strategies). Map 3 should also be amended to either remove the 800m walkable catchment and the associated note, or alternatively to show the Principal Public Transport Network (PPTN) and include walkable areas within 800m.

Increasing the supply of social and affordable housing (Direction 10)

Direction 10 in the draft IMLUFP seeks to ‘increase the supply of social and affordable housing’, however the strategies under this direction along with actions 4 and 5 (relating to identifying government land and a pipeline of sites with Council) will not alone meet the need in the inner metro region. The key gap that the IMLUFP needs to address is the use of planning mechanisms to deliver affordable housing.

The affordable housing need in the region which the IMLUFP needs to address is:

- *Social Housing* - In the inner metro region in 2016 there was an estimated average shortfall of 4,400 - 5,500 social housing units per municipality, or 13,200 - 16,500 units across the region. By 2025 this shortfall is projected to increase to an average of 6,500 - 8,800 units per municipality or 19,500 - 26,400 units across the region; and by 2036 the shortfall is projected to increase to 39,000 units across the region (based on data supplied by inner metro region Councils).
- *Affordable Housing* - In 2019 (pre-COVID), no median private rental housing was affordable to very low, low and moderate-income singles, very low and low-income couples, and very low and some low-income families (Liss Ralston, sourced from the DHHS June 2019 Rental Report). 67.5% of all workers in the M9 region are on low to moderate incomes, however, 82% of low-income earners and 83% of moderate-income households cannot afford to live in the region, impacting availability of key workers that are essential for the region’s economy (Liss Ralston, sourced from 2016 Census indexed to 2021).
- *Homelessness* - In 2018 there was an estimated 259 persons who were homeless and sleeping rough in the region (extrapolated from the IMAP street count). Overall, there were 3,698 persons experiencing all forms of homelessness during 2018. To deliver a sufficient supply of supported housing projects in the IMR over next 10 years to achieve a functional zero level of homelessness (i.e. a higher placement rate of persons who are rough sleeping into long-term housing than are entering and experiencing homelessness), 259 long-term beds within supported housing would be required to address the level of rough sleeping measured back in 2018 (ABS Census).

The draft IMLUFP refers to Port Phillip having the highest median housing prices in the region, with less than 1% of rental housing being affordable, compared with Melbourne and Yarra which has 1 – 2% of rental housing which is affordable.

The use of planning mechanisms appears to be better developed in Plan Melbourne than in the draft IMLUFP (which is supposed to provide further detail on how Plan Melbourne be implemented). For example, Plan Melbourne (page 56) states:

- ‘...the absence of clear planning tools or mechanisms to require the provision of social and affordable housing as part of the planning process. Current approaches (such as requiring section 173 Agreements under the Planning & Environment Act 1987 or applying requirements through tools such as Development Plan Overlays) have been criticized for not being sufficient, robust and inequitably applied.’
- Refers to planning system reforms to facilitate delivery of social and affordable housing, create clear head of powers for affordable housing contributions, and clarify the role of the planning system has to play in the delivery of new housing, including social and affordable housing.
- Refers to the need to create ways to capture and share value a percentage of uplift from rezoning from contributions, to encourage more social and affordable housing within major urban renewal developments (Policy 2.3.4).

The breadth and depth of the affordability problem in the region requires use of mandatory planning mechanisms, such as inclusionary zoning (providing very low and low income social housing) and value uplift capture (for example via re-zonings, or via mechanisms such as floor area uplifts where discretionary density of height controls can be varied and a floor area uplift offered) in addition to

continued and strengthened use of voluntary planning agreements (which tend to provide low and moderate income affordable housing).

The IMLUFP needs to include broaden Direction 10 to include the role of planning mechanisms in delivering affordable housing. New strategies and actions are required to achieve this.

Further detailed comments on the housing choice chapter are included in the Implementation section below and Attachment 1.

Chapter 9 – Sustainability and resilience

The draft IMLUFP could go further in addressing the full range of sustainability and resilience issues faced by the inner metro region in Chapter 9. The following should be addressed:

- Inclusion of a commitment to achieve net zero emissions by 2050 at the latest, as per the Victorian Government target. The draft IMLUFP currently only addresses this for urban renewal precincts and major redevelopment sites.
- The challenge of rising groundwater in low-lying urban areas should be acknowledged and addressed. There is currently very little understanding of these potential impacts to infrastructure and communities
- Strategies relating to the circular economy should be added (i.e. for waste & recycling, organics, use of materials in construction). Inner Melbourne has distinctive challenges relating to waste storage, collection and processing, particularly in multi-unit developments and areas with existing narrow streets and laneways.
- Water availability and drought should be addressed as key issues – in addition to stormwater harvesting opportunities (Strategy 100), implementing a recycled water network in Fishermans Bend and Arden McAuley will be key to reducing dependency of this region on potable water.
- The Inner Metro area has specific issues relating to access to renewable energy that should be addressed, including much higher than average rates of apartment dwellers and renters.
- Higher ESD standards for Inner Melbourne compared to the rest of Victoria should be included. The three councils have endorsed commitments to support this.

Further detailed comments on the sustainability and resilience chapter are included in the Implementation section below and in Attachment 1.

Implementation of the draft IMLUFP

Our primary concern at this stage is around the implementation of the draft IMLUFP. While Council generally supports the draft IMLUFP (noting the changes requested in this submission), we are concerned that the 5-year action program along with the translation of the IMLUFP into regional policy in the Port Phillip Planning Scheme will not be enough to achieve all of the directions and strategies.

5-year action program

While the draft IMLUFP is a 30-year strategy, it includes a 5-year action program. We suggest that further actions are added beyond the 5-years to fill the gaps between the current 13 actions, and what can be achieved in regional policy in the Port Phillip Planning Scheme. The IMLUFP needs to provide further actions (that extend beyond 5 years, we suggest for at least the next 10-15 years) and also clarify how strategies can be achieved through available planning mechanisms.

Some examples of the types of gaps that we believe are not currently addressed include:

- Clarity on planning mechanisms. For example, the importance of retaining affordable commercial space in South Melbourne to support this inner-city enterprise precinct is identified in Direction 2 (Strategy 7) and Direction 5 (Strategy 17). The IMLUFP needs to go further by also identifying the planning scheme mechanisms that are available to retain and/or encourage the provision of new affordable spaces. A similar issue exists in Direction 9 relating to improving housing choice and diversity at a regional level, in particular achieving a range of dwelling types and sizes within the region (Strategy 33) – it's a critical issue that will need specific planning mechanisms.

- Ongoing monitoring of key issues: For example, the need to balance commercial uses with residential uses in key employment areas is identified in Direction 1 (Strategy 4) and Direction 8 (Strategy 31). Protecting commercial land zoned Commercial 1 Zone (C1Z) from predominantly residential development is a key issue in CoPP, particularly in precincts such as St Kilda Road North and South Melbourne. It is highly unlikely that land will convert back to any other use once it has been developed with residential dwellings and subdivided. The IMLUFP should be more proactive in ensuring these directions and strategies are achieved by for example including an action to monitor the loss of existing commercial floorspace via redevelopment, and also track the land use mix of new developments in the C1Z (which we are finding to be predominantly residential). Without this, the gradual loss of commercial floorspace and replacement with residential uses is likely to erode the viability of the commercial precincts over time.

The draft IMLUFP 5 year action program identifies three actions to be led by Council:

- 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 LUFP. 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.

These actions are generally well aligned with Council's current work program.

Council officers have commenced preparing the South Melbourne Structure Plan and a municipal-wide Spatial Employment and Economic Framework (which align with Action 1). Council has also committed to the preparation of a new municipal Housing Strategy as part of its new Council Plan 2021-2031 (which aligns with Action 3).

The Greening Port Phillip Strategy identifies where canopy cover can be increased on CoPP owned/managed public space and streets (which aligns 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.

Further detailed comments on the actions are included in Attachment I.

Implementation of the IMLUFP into the Port Phillip Planning Scheme

Council has some concerns over the translation of the IMLUFP into regional policy provisions in the Port Phillip Planning Scheme, relating to:

- The level of detail to be included in the regional policy. Regional policy should not duplicate State policy or local policy, and instead needs to identify and build on the common and unique attributes of the inner metro region and help unite the future directions of these municipalities. Without this integration, the regional policy could become an odd combination of policies that do not make sense as a stand-alone policy.
- How the regional policy provisions will be monitored and updated over time, particularly in response to changes to local policy within any of the three Councils. Our preference is that the Councils will have the opportunity to seek to amend regional policy provisions as part of planning scheme amendments to implement local policy work, rather than relying on (potentially separate) State Government (VC) amendments.

We reiterate our request for Council officers to be engaged in a meaningful way early in the drafting of the planning scheme amendment that seeks to implement the IMLUFP into regional policy.

We would also like to confirm that it is not our intent to make any changes to local policy until further strategic planning work has been undertaken (e.g. a new municipal-wide Housing Strategy).

We would be pleased to discuss this correspondence or any queries you may have. Please do not hesitate to contact us.

ATTACHMENT I

Table I - Detailed comments on draft IMLUFP

Page	Comment
Chapter 01 - Introduction	
6	Land use and transport integration should also refer to the need for early introduction of efficient public transport to urban renewal areas.
Chapter 02 – Regional Snapshot	
10	The first dot point at the top of the second column references ‘Elsternwick’. Elsternwick is not within the City of Port Phillip. Suggest changing to ‘Elwood’ instead.
11	Question the reliance on 2016 census data and referring to this data as 'now/current' given it is now 5 years old.
Chapter 03 – Vision: Inner Metro Region in 2050	
14	In the fifth dot point relating to the public transport network, please add the word "reliable".
15	<p><u>Map 1 – Inner Metro Region 2050 Plan</u></p> <ul style="list-style-type: none"> • Fishermans Bend public transport is shown as ‘Investigation areas light rail and heavy rail’. This should be listed as a transport project – committed. • Strategic Cycling Corridors should be shown. • Park Street tram link should be shown as a transport project – committed.
Chapter 04 – Productivity	
Note: Please also see comments in the body of this submission.	
19	<p><u>Regional Strengths:</u></p> <ul style="list-style-type: none"> • Consider calling out Advanced manufacturing, engineering and innovation within the Fishermans Bend Renewal Area as a regional strength. • Reference should be made in this section to the whole of the Fishermans Bend Urban Renewal area (not just the NEIC), which is the largest urban renewal area in Australia. • This section could specifically acknowledge the role of research by public universities in driving international research rankings. One benefit of specifically acknowledging the role of research is that because the funding model faces near term structural challenges, could undermine a key strategic advantage of the state economy. Aside from direct funding risks to research rankings, there are attendant risks such as risk of sector / geographic flight of human capital reducing capacity in some research areas, as many workers are forced to leave academic careers. Aside from driving overseas student demand (which in turn funds research through price premiums), international research rankings are also a key indicator of adaptive capacity within the economy, a signal for foreign direct investment, and a critical link pre-cursor to commercialisation. <p><u>Regional Challenges</u></p> <p>Suggest the following additional regional challenges are added:</p> <ul style="list-style-type: none"> • Achieving design excellence in new buildings and investing in high quality public environments to maintain the regions standing as a global competitor. This is specifically critical in attracting businesses to the knowledge and enterprise precincts. • This section does not presently acknowledge distributional dimensions of productivity, the role of urban poverty or increasing urban inequality more broadly. A key challenge is ensuring any gains in productivity deliver wider societal benefit,

	<p>which means we need to think about how the benefits are distributed within society. Explicitly articulating the link between gains in (for instance) the productivity of labour and improved outcomes for people in (for instance) the lowest income two quintiles in the conversation about productivity may go some way towards focusing policy makers.</p> <ul style="list-style-type: none"> • Regional challenges could be updated to include quality, completeness and availability of data available to city edge councils on employment and employment floor space. • Additionally, along with affordable workspaces it could be noted that start-ups, new enterprises and creative industries do not have uniform requirements in relation to the location of and type of workspace, place character, location, infrastructure and amenity (noting Direction 5 provides some acknowledgement of these differences). • Another regional challenge is that the Port of Melbourne expansion along with Inland Rail development will put pressure on local and regional freight trips on local roads.
21	<p><u>Map 2. Inner Metro Region housing choice 2050</u></p> <ul style="list-style-type: none"> • Strategic Cycling Corridors are not shown as a committed transport projects. • Fishermans Bend public transport is shows as 'Investigation areas light rail and heavy rail'. This should be changed to transport project - committed.
23	<p><u>Direction 1: Support the Central City to become the pre-eminent and largest commercial centre in Australia by 2050</u></p> <p>This section could benefit from adding an emphasis on connectivity / supply chain integration to city edge precincts. This is particularly the case in relation to the transition from the CBD/Docklands to Fishermans Bend and South Melbourne. The role of the CBD and city edge precincts are mutually interdependent.</p>
25	<p><u>Direction 3: Facilitate the development of the Parkville and Fishermans Bend NEICs as major economic contributors for the regional and national economy supported by increased transport connectivity</u></p> <p>The connection to adjoining precincts should be emphasised in the case of Fishermans Bend as there will be a natural centre of gravity drawing economic networks of economic activity back towards the CBD and CBD North. Targeted interventions may assist in ensuring strong supply chain integration is also achieved with South Melbourne, Sandridge and Montague. While it may not be possible to precisely identify these interventions at present, some acknowledgement that the objective is not so much to optimise performance of precincts as isolates but rather as performance as a network may have some value. Strategy 15 under Direction 4 leans in this direction.</p>
27	<p><u>Direction 3 (cont.)</u></p> <p><u>Strategy 08 and 09</u> are references to Parkville NEIC in these strategies meant to be the Fishermans Bend NEIC? Move to Parkville NEIC section if this is not the case.</p> <p><u>Strategy 12</u> suggest this strategy should call out the need to provide light and heavy rail connections rather than 'provide public transport connections'. This downplays the need for mass transit to support the future employment and population needs. Additionally, the major urban renewal precinct is included in this strategy, but not the overall direction. As per earlier comments, more emphasis is needed on the CCZ precincts.</p>
29	<p><u>Direction 4: Enhance the Inner Metro Region's vibrant and diverse activity centres and their contribution to the identity of the region</u></p> <p>Has the projected need for additional commercial floorspace in the inner metro region considered the associated impacts of the COVID-19 pandemic and working from home? This section states that an additional 4 million square metres of commercial</p>

	<p>floor space will be needed over the next 10 years (by 2031), which represents a significant increase of 44% in 10 years.</p>
31	<p><u>Direction 5 – Retain existing and support emerging employment areas, including industrial and enterprise precincts, across the Inner Metro Region</u></p> <ul style="list-style-type: none"> • The enterprise precinct in South Melbourne should be designated a ‘regionally significant commercial area’ rather than a ‘regionally significant industrial area’. The area is zoned Commercial 2 Zone (C2Z). • The aspiration to retain existing industrial land as it complements the evolving, flexible and diverse nature of employment and creative industries should be more strongly articulated/reflected in the strategies. This is important for the diversity of services and jobs available to workers and residents of inner metropolitan communities, given many such uses have gradually been driven out over time. To the extent that land use policy facilitates retention of existing light industrial uses, this should be encouraged. Economic diversity and specifically the presence of industrial base has been shown to a critical factor in economic resilience in the context of pandemic related economic shocks and disruption of global supply chains. • The need identified in this direction for improved monitoring and protection of remaining industrial and commercial land should form an action in the implementation plan. • The public realm is also important in attracting/retaining creative industries in enterprise precincts, along with proximity to the central city, amenity and built form character. • Additionally, the preservation of industrial fabric is an important place condition for many creative businesses. Critically, the scale and type of development within emerging precincts needs to be managed to preserve granular street grids and urban character, because the relationship of place to economic production in these city edge precincts has some fundamental differences to how that relationship plays out in the CBD environments. • While we are generally supportive of the objectives around affordable floor space and distinct role of emerging precincts including South Melbourne, we note that the divergent locational and workspace needs of different segments, and the need to ensure those conditions are preserved and/or cultivated in a way that is complementary to the intended economic role of precincts.
33	<p><u>Direction 6: Facilitate well-designed, high-amenity and quality medium- and higher-density environments in major urban renewal precincts to provide employment growth</u></p> <p>Strategy 21 refers to encouraging development that is consistent with the “specialised employment role” of Fisherman Bend Urban Renewal Area – what this specialised employment role is should be further defined in this strategy.</p>
35	<p><u>Figure 11 – Major urban renewal precincts in the Inner Metro Region</u></p> <p>Suggest clarifying that 40,000 jobs are to be provided in the CCZ precincts and 40,000 jobs are to be provided in the Fishermans Bend NEIC (currently says 80,000 under Fishermans Bend CCZ precincts).</p>
45	<p><u>South Melbourne Major Activity Centre</u></p> <ul style="list-style-type: none"> • The ‘What needs to be considered’ column should acknowledge this area is subject to flooding. • The ‘Future role/strategic opportunities’ column references improving access and economic links between the creative clusters of South Melbourne and the Southbank Arts Precinct. Suggest Fishermans Bend and in particular the Montague precinct is added, as current linkages are poor.
46	<p><u>St Kilda Major Activity Centre</u></p>

	Under 'What needs to be considered', the reference to Carlisle Street should be changed to Acland Street as the MAC comprises Fitzroy Street and Acland Street.
49	<u>Table 7, Actual and projected population by Local Government Area, 2016 - 2036</u> This table has a typographical error as it refers to the region's projected population to be only 48,680 in 2026.
Chapter 05 – Housing Choice	
<u>Note:</u> Please also see comments in the body of this submission.	
52	<u>Regional strengths</u> The regional strengths should be broadened to further reflect opportunities for housing supply, and to adequately reflect diversity and choice, and social and affordable housing. Potential other regional strengths include: <ul style="list-style-type: none"> • Highly developable land, able to accommodate medium and high density development with dwelling yields that will deliver greatest housing outcomes. • Melbourne's highest rate of housing growth (apartments), with an imperative to ensure this is inclusive of significant affordable and social housing across the continuum of housing need. • Melbourne's greatest concentration of physical and social infrastructure, including community housing agencies, housing support services and public health services, in addition to public transport access and a high concentration of relevant employment opportunities. This ensures new housing (including social and affordable housing) is well-located and can capitalise on existing infrastructure and established housing and support services. • Majority of Melbourne's high- rise public housing estates, ready for renewal. • Concentration of persons experiencing homelessness and highest numbers of persons who are sleeping rough. • A partnership opportunity that can leverage the collective commitment and experience of the IMR Councils in delivering social and affordable housing.
55	<u>Map 3 – Inner Metro Region housing choice 2050</u> <ul style="list-style-type: none"> • Suggest adding the 'housing opportunity areas' of St Kilda Road North and St Kilda Road South to this map (noting this will need to overlap with the state-significant commercial land in St Kilda Road North). • The existing and planned public transport network should be added to this map. • The 800m walkable catchment should be amended or removed as per the comments in the body of this submission under housing choice. In addition, the overlapping of these walkable catchments should be further refined in the map – they should join together rather than overlap (at the moment the outer parts of the 800m are overlapping with other centres, they should merge, so that the darker coloured areas are larger).
59	<u>Direction 08: increase the supply of housing in the Inner Metro Region and ensure housing matches the needs of the growing and changing population</u> <u>Major activity centres:</u> The role/function for housing should acknowledge the significant heritage areas within many of these centres, and the need to balance the protection of heritage with accommodating growth.
60	<u>Direction 08 (cont.)</u> <u>Housing opportunity areas:</u> The role/function for housing for housing opportunity areas states that these areas are generally zoned as Residential Growth Zone (RGZ), which is inaccurate and needs to be amended. While St Kilda Road North has some areas of RGZ along Queens Road, there is no RGZ in the St Kilda Road South precinct. Large

	<p>areas of both these precincts are zoned Commercial 1 Zone. There are also areas of General Residential Zone and Mixed Use Zone.</p> <p>In addition, St Kilda Road North precinct is also a state-significant commercial precinct, which should be noted here, to distinguish a key difference between these two housing opportunity areas.</p>
61	<p><u>Direction 9: Provide greater choice and diversity of housing in the Inner Metro Region</u></p> <p>The draft IMLUFP identifies the need for a diversity of household sizes to be achieved, especially for larger families (Direction 9, Strategy 33). Council supports increased diversity to:</p> <ul style="list-style-type: none"> • Increase housing choice by delivering larger 3-bedroom dwellings for families with children, and a small supply of 4-bedroom apartments. The private housing market is predominantly focusing on delivering smaller apartments (1 and 2-bedroom apartments). • Address projected need: page 49 refers to the projected household sizes by 2051, including lone persons which will have the highest proportion (38% of households), while families with children will comprise 22% of households; and 26% of the region's dwellings have 3+ bedrooms, compared with 73% for the Greater Melbourne average. • Achieve housing diversity in private housing (noting that new community housing tends to include larger (3+ bedroom) dwellings). This will create greater housing choice and, in turn, create greater market demand from larger families. <p>Currently planning policy in the Port Phillip Planning Scheme only sets targets for dwelling size for Fishermans Bend Urban Renewal Area, for developments over 100 dwellings. Clause 58 also encourages a diversity of dwelling sizes in developments of more than 5 storeys or 10 or more dwellings, but does not set policy targets. This requires strengthening as:</p> <ul style="list-style-type: none"> • Developments are providing predominantly 1 and 2 bedroom dwellings, with some providing 'flexible' floor plans that allow for amalgamation of dwellings to create larger dwellings, to be taken up if market demand for larger apartments increases. • Precedent has shown that take-up of larger apartments is likely to only occur with high end apartments. • Without an increase in supply of larger dwellings in urban renewal areas (for example through mandatory dwelling size targets), housing choice for larger families will not occur, and urban renewal areas will not provide diverse communities. <p>The IMLUFP should go further to identify how Direction 9 and in particular housing diversity will be achieved at a regional level – it's a critical issue that will need specific planning mechanisms.</p> <p>The draft IMLUFP should strengthen ways in which key workers can afford to live in the region. Given that 82% of low-income earners and 83% of moderate-income households cannot afford to live in the region, impacting availability of key workers that are essential for the region's economy. Despite the problem being referred to in page 61, no solutions are provided, such as via targets for household diversity under mandatory and voluntary planning mechanisms.</p> <p>In addition to encouraging adaptable housing (Direction 9, Strategy 35), the draft IMLUFP should also encourage accessible and visitable housing in the region. This needs to provide a framework for current and future building regulatory reform, e.g. the National Construction Codes Board's current review of standards for the National Construction Code. This is important to ensure that all strategic planning tools</p>

	encourage accessible, visitable and adaptable housing, and support the planning approvals system to have ongoing alignment with future changes in building regulation.
63	<p><u>Direction 10: Increase the supply of social and affordable housing</u></p> <p>The IMLUFP could further outline the key opportunity that redevelopment of public housing estates can play in increasing social and affordable housing supply, diversity and quality. This opportunity is only briefly referred to in Direction 10 (page 63). These sites may be able to deliver mixed housing outcomes which can include and increase affordable and social housing units and net new beds, and a housing mix, such as public, community, affordable housing and private (market) housing.</p> <p>The IMLUFP should also encourage supported social housing, such as the Common Ground model, that house persons who are sleeping rough, and support them to maintain their housing by providing support services within these facilities. This is critical to address the increasing number of persons sleeping rough in the region (estimated at 259 in 2018), which is currently only temporarily reduced by hotel respite accommodation during COVID lockdowns.</p>
Chapter 06 – Integrated Transport	
Throughout document	Refer to "bike riding" rather than "cycling".
66	<p><u>State of play</u></p> <p>This section does not include any statistics on freight movement. Is there an opportunity to provide information regarding number of import and exports in TEU numbers to the Port of Melbourne or other traffic statistics?</p> <p>Commentary regarding key arterial routes in the inner metro region would also be useful to define the state of play.</p>
Chapter 07 – Liveability	
93	Inconsistency between the text and the graph as to the amount of open space per person in City of Port Phillip and Yarra (38/33sqm), which should be corrected.
Chapter 08 – Strong Communities	
114	The early delivery of community hubs and other social infrastructure is important to the CCZ precincts in Fishermans Bend (major urban renewal precinct). Strategy 82 should also reference major urban renewal precincts.
Chapter 09 – Sustainability and Resilience	
<u>Note:</u> Please also see comments in the body of this submission.	
129	<p><u>Map 9 – Inner Metro Region sustainability and resilience 2050</u></p> <ul style="list-style-type: none"> • Areas marked as 'priority – urban heat response' appears to be the entire area. Some level of priority should be given to high heat vulnerability areas. • Areas marked as 'priority – urban expand tree canopy cover' – it's unclear how these priorities are set, they don't seem to correspond with areas of low canopy cover, or high heat vulnerability areas.
131	<p><u>Direction 23: Integrate cooling and greening initiatives with land use and infrastructure change to assist in managing urban heat</u></p> <p>Although this direction mentions protection of existing trees, the underlying strategies do not address this. An additional strategy should be added, or strategy 93 or 94 should be expanded to include protection of existing high value vegetation and trees.</p> <p><u>Strategy 95:</u> should be expanded to include infill development, in addition to industrial developments and apartment buildings.</p>

	<p><u>Direction 24: Increase the tree canopy cover across the Inner Metro Region to achieve 28 per cent cover by 2050</u></p> <p>What planning mechanisms are available to ensure these tree canopy targets be implemented? How will they work with Clause 58 requirements, and what about other non-residential development? Unsure whether the mix between parks, open space and waterways (30%) and residential, commercial and industrial (40%) is right. An issue is that our commercial and industrial areas in South Melbourne Structure Plan study area (as an example) have almost 90% site coverage.</p>
135	<p><u>Direction 27: Manage the impact and risk of coastal inundation and sea level rise</u></p> <ul style="list-style-type: none"> • <u>Strategy 103</u> should be expanded to include all types of flooding, rather than just stormwater. It's unclear what this strategy entails – it should be clear that the intent of the strategy is to resolve policy and design conflicts between raised flood levels and heritage, urban design & accessibility outcomes. • <u>Strategy 105</u> to limit major land use change in locations with future coastal inundation – it is unclear how does this strategy aligns with the major urban renewal areas of Fishermans Bend and Arden Macauley? • There are no strategies proposed to protect existing areas from coastal inundation, including delivery of the Fishermans Bend Water Sensitive Cities Plan (including a levee, streetscape & onsite WSUD requirements). These should be added. • An action/strategy to update current SBOs & LSIOs to incorporate all known climate change risks should be included.
Chapter 10 – Implementation	
142	<p><u>Action 10: Identify non-residential land where additional canopy trees can be planted to offset vegetation removal.</u> The draft IMLUFP states that this action is solely for Councils to implement. There are many state government departments and agencies that also have a responsibility to manage land in this area (VicRoads, Parks Vic, VicTrack). These should be included as delivering on this action.</p> <p><u>Action 11: Investigate options to develop a pilot fund to underground powerlines to support expanded tree canopy cover.</u> Recommend a stronger commitment to this action – either investigate options or deliver a pilot project.</p>