



Town and Country Planning Association Incorporated

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**Submission by the Town and Country
Planning Association and Transport For
Melbourne in response to the Plan
Melbourne 2016 Refresh Discussion Paper**

Preamble – About the Town and Country Planning Association

The Town and Country Planning Association (TCPA) advocates integrated planning of land use and transport for ecological sustainability and a healthy living environment. The TCPA is a non-profit public organization, incorporated under the Associations Incorporation Reform Act 2012 of Victoria. Established in Victoria in 1914, the TCPA is independent of any party political organisation.

The TCPA's philosophy towards the regulation and planning of land use and related public functions is described in its *Charter For Planning*, adopted in 1997. The Charter can be read at the TCPA's public website at www.tcpa.org.au in the menu option *Publications* → *Other Documents*. Amongst the objectives of the TCPA are:

- The promotion of the application of principles of ecological sustainability to existing and new settlements and urban regeneration;
- Encouraging the practice of environmental planning;
- Advocating the establishment of an effective strategic planning framework.

The TCPA submitted an extensive submission to the process for the Metropolitan Planning Strategy in March 2013. That document, titled *TCPA Submission on Metropolitan Strategy Plan Discussion Paper (2013)* is submitted as a separate document with and as an appendix to our current submission to "Plan Melbourne 2016 Refresh", and we make numerous references to that appendix in our current response. *TCPA Submission on Metropolitan Strategy Plan Discussion Paper (2013)* is also available at TCPA's website (www.tcpa.org.au) in the menu option *Publications* → *TCPA submissions*, at URL <http://tcpa.org.au/wp-content/uploads/2014/09/TCPASubmissionMetropolitanStrategyPlanDiscussionPaper.pdf> . In our current response, we often refer to it as the 'TCPA 2013 submission'.

About 'Transport For Melbourne'

Transport for Melbourne ("TFM") was established in 2013 by Prof Nick Low and Roger Taylor. It is a small group of independent transport professionals whose mission is to promote a better understanding of transport issues that Melbourne faces now and how these can be better addressed by applying lessons learnt from cities that have become models of international best practice – cities that have been confronted with similar problems. These professionals have years of experience covering State transport policy, transport research, public transport project analysis and local government project collaboration.

Our concern is that the transport crisis we face today in Melbourne is to a large extent a result of our government's failure to appreciate and apply these lessons.

The transport problem is always seen in terms of infrastructure: 'we don't have enough, therefore we must pour money into building more'. But the immediate problem is that we don't use what we have effectively and efficiently. There are many cities in the world with superior transport systems that have far less infrastructure than Melbourne.

Melbourne needs a new vision for transport and a new plan to implement the vision. The plan must start not with new infrastructure but with institutional change and better management of our public transport system and new investment priorities. We want transport on rails and transport on roads to be planned as a single integrated network. Thinking about transport must be joined up with

thinking about the future shape of our city. Walking and cycling must be treated as transport modes needing safe infrastructure. We need a plan that reflects the best international practice.

The Charter outlined in this submission was developed over a number of months with representatives from a number of community groups and is an attempt to outline broader community expectations and aspirations for Melbourne’s Transport. The final version was written by Prof Nick Low.

TFM’s contribution was prepared by Syd Heron and Roger Taylor, with input from Liam Edgerton.

Prof Nicholas Low is the author or editor of ten books, two of which have won national and international prizes. He is known for his contributions to the study of the politics of planning and transport, and for his international research on urban sustainability published in numerous international journal articles. He convened the 1997 conference at the University of Melbourne on Environmental Justice. His book (with Brendan Gleeson) *Justice, Society and Nature* won the Harold and Margaret Sprout Prize of the International Studies Association 1998 for the best book published on ecological politics in that year. He won a major grant from the Volvo Foundations to create the Australasian Centre for Governance and Management of Urban Transport (GAMUT) which he directed from 2006 to 2011.

Roger Taylor, spent more than thirty years in the transport industry including twenty years practical experience working for the former Victorian Railways, VLine and the Public Transport Corporation. He has run numerous forums on transport issues. The emphasis for many of these forums has been to develop a better understanding of Melbourne’s transport issues and opportunities for improvement, particularly in public transport by applying lessons learnt from international best practice.

Structure of the TCPA’s 2016 submission document

The TCPA has structured its submission to Plan Melbourne 2016 Refresh within the MS Word document template provided by the DTPLI. In this submission, the TCPA and TFM have added commentary about extra issues. These are listed below, by headings.

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Glossary of terms and abbreviations used by TCPA in this submission

BRT bus rapid transit, particularly express or frequently-stopping bus services afforded with lane-priority or grade separation. For examples, Skybus, PTV bus routes along Eastern Freeway

LRT	Light rail transit / tramway
MAC	Ministerial Advisory Committee
MMAC	Major (metropolitan) activity centre
MPA	Metropolitan Planning Authority
PT	Public transport
Yellowfield	Equivalent to the word 'greyfield' used in the Plan Melbourne Review Discussion Paper.



[Information from DTPLI]

Introduction

Please find following key information about making a submission.

Who can make a submission?

Anyone is able to comment and make submissions on the Plan Melbourne refresh discussion paper.

How will submissions be used?

We want a Plan Melbourne to reflect the community's views, particularly in relation to housing affordability and diversity, energy efficiency and climate change. All submissions received will be reviewed and inform Plan Melbourne 2016.

Will submissions be publicly available?

Written submissions will be publicly available and will be able to be read by others, unless you have requested and been granted confidentiality status.

Why do I have to register to make a submission or comment online?

The information provided in the registration form will help us analyse the responses and help us know which issues are of concern to residents in which areas of Melbourne or to particular community groups.

Can I provide a submission in another format?

Given the high volume of submissions anticipated it is strongly preferred that the online form or the downloadable template be used. This will ensure the most effective evaluation of the issues raised in submissions.

How do I make a submission?

You will need to register to make a submission. Submissions and comments will close at 5.00pm AEDST Friday 18 December 2015. Once registered, there are two ways to make a submission:

- Complete the [online submission form](#)
- [Upload](#) your submission using this submission template. Note that the preferred format is MS Word,

As part of making a submission, you will need to agree to the privacy collection notice and statement of confidentiality. These are outlined in both the online submission and upload forms.

Do I have to respond to all of the questions in the submission form for my views to be heard?

Not at all. You are welcome to respond to as many, or as few, of the questions on the Plan Melbourne refresh discussion paper as you would like.

Can I comment on other areas not addressed in the Plan Melbourne refresh discussion Paper?

This refresh is not intended to comprehensively revise Plan Melbourne 2014. It builds on the extensive work and consultation underpinning Plan Melbourne 2014. Much of Plan Melbourne 2014 enjoys bi-partisan support and will not change.

The Plan Melbourne refresh discussion paper and consultation process is asking Melburnians to take another look at particular aspects of Plan Melbourne 2014 that need revision such as the key issues of housing supply, diversity and affordability, and climate change and will reflect the Government's transport network priorities.

Submission Template

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

1. The discussion paper includes the option (option 5, page 16) that Plan Melbourne better define the key opportunities and challenges for developing Melbourne and outlines some key points for considerations in Box 1. **Are there any other opportunities or challenges that we should be aware of?**

The housing location planning and travel needs for an ageing society (of between 25% and 30% of the total population in the 31 LGAs of the MSD) by 2051 are not adequately covered.

The prospects and risks for major changes in types of economic activities and their attendant needs or preferences for land space and value intensity and physical facilities (building types, infrastructure connections) should be addressed in the broad zoning of land space to be set aside or else made available within the commercial zones including the National Employment Clusters.

Another way of expressing this is to allow for significant change in land-uses and permitted building profiles (subject to necessary constraints on noxious or hazardous industrial processes) as a risk-redundancy, so reduce the risk of “rust-belt” development. For example, could the continuation of Internet commerce reduce the demand for retail floor-space in metropolitan activity centres?

Melbourne faces many challenges in the future that have not been addressed. Planning projections are based to a large extent on business as usual, despite the fact that global economic growth has stalled with the prospect of a severe economic and financial downturn. Global political tensions have increased and an array of environmental pressures associated with climate change, resource depletion, and environmental degradation and over population are becoming more apparent and will act as brakes on growth. These factors collectively are very difficult to plan for but their impacts will be profound. As a consequence the reliability of long term business as usual forecasts will be of questionable value, and highlights the need for planning strategies to respond to addressing today's problems.

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

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Please explain your response:

There is the clear need to define sustainability and its measurement in performance. It should not be a “spin” word, politically employed without the means of achieving it in reality. Here is a definition

quoted in Wikipedia: “In ecology, sustainability is the capacity to endure; it is how biological systems remain diverse and productive indefinitely. Long-lived and healthy wetlands and forests are examples of sustainable biological systems. In more general terms, sustainability is the endurance of systems and processes. The organizing principle for sustainability is sustainable development, which includes the four interconnected domains: ecology, economics, politics and culture....”

The plan, in its implementation, needs to define what each LGA needs to achieve.

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

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

Please explain your response:

A fixed urban growth boundary (UGB) is strongly supported, however there should be binding policy processes in place to guard against acceleration of peri-urbanisation far beyond the UGB but dependent on the Melbourne metropolitan area that would be a consequence of the UGB rules. This can eventuate if restrictive development re-zoning practices inflate the market values of open- and built-over land, leading to people and businesses migrating to cheaper land areas beyond the UGB, especially near existing towns. Increased peri-urbanisation would lead to increased commuter costs of time and money, as well as increased externalities (e.g. vehicle emissions, negative health impacts) and burdens such as increased public sector commitments to supportive infrastructure.

To some extent, peri-urban growth (i.e. beyond Melbourne’s UGB) will be stimulated by the strict enforcement of the UGB in rezoning. A proactive strategy needs to be implemented by the Victorian planning department in coordination with the MPA and non-metropolitan municipalities to focus peri-urban growth into towns located on existing regional rail lines, preferably at existing stations.

The UGB should be seen as the inner boundary of a green belt around Melbourne.

London is a good example of a focused ex-metropolitan growth strategy. Outward growth of London was stopped by a strictly enforced green belt, and towns lying on railway lines to London 30-40 miles from the city (i.e. beyond the green belt) were expanded as a deliberate policy to house overspill population from London. Large numbers of people commute daily from these towns to central London, in many cases taking less time than commuters from London suburbs. At the same time, towns in the commuter belt provide many local jobs, and in some cases jobs have been relocated from London to commuter towns.

Growth beyond the UGB should be channeled into established towns that have sufficient social infrastructure (such as schools, medical facilities, public transport, cultural and recreational facilities) to provide the same 20-minute neighbourhood conditions that are proposed for the metropolitan area.

Victorian towns such as Bacchus Marsh, Gisborne, Woodend, Kyneton, Broadford and Warragul could

be developed as alternatives to suburban expansion (and to some extent already are), and Geelong is already well down this path.

To encourage such consolidation, land within the green belt but not in an existing town or settlement should not be allowed to be zoned for residential development.

Some of the land within the UGB should be set aside for recreational use (sports fields and parklands). By defining the population alternatives to be provided for within the existing MSD, the green space requirement areas can be defined once standards are set per household or person to be housed within the MSD.

It is important to distinguish between peri-urbanisation where people live beyond the UGB but travel to or from home to places within the UGB-defined metropolis for repetitive or frequent (say, at least once per week) activities such as work, education, personal services, shopping, social and recreation (or the reversed locations of these activities), and peri-urbanisation (?) where people's living activities are reasonably locally-contained and not impinging on the Melbourne metro area. (The latter pattern, strictly speaking, is not peri-urban).

Thus, a baseline is required upon which the shifts in land-related activities across the UGB and existing urbanized areas can be monitored to measure a trend towards peri-urbanisation and increased measures of land transport effort (of people and goods) according to mode, \$ cost, time and energy, as well as externalities and trauma. This need reinforces the TCPA's recommendation that robust time-based measurements of transport and land-use activities be maintained and expanded as required, e.g. the current VISTA monitoring series.

4. The discussion paper includes the option (option 8, page 18) that Plan Melbourne 2016 should more clearly articulate the values of green wedge and peri-urban areas to be protected and safeguarded. How can Plan Melbourne 2016 better articulate the values of green wedge and peri-urban areas?

80% of the population needs to be housed within twenty minutes' walking distance of quality green space for mental and physical wellbeing of the wider community. View lines and landscapes need to be defined and protected by legislation, for such critical areas as coast line, hillsides and waterways, examples of which include the Yarra River and its tributaries.

It is especially important to preserve and protect areas of indigenous vegetation as wildlife (flora and fauna) habitat and water catchment areas, and to keep farmland in production. Some form of buffer zone needs to be created along the UGB between agricultural land and residential land, which could be designated parkland. A buffer zone could be used to plant urban forests, for example, or to accommodate walking, cycling and horse-riding trails.

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

Freight corridors and high-volume journey-to-work flows.

Maps such as walk-scores and health indices must be included.

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

Strongly Disagree

Disagree

Agree

Strongly Agree

Please explain your response:

The 20-minute neighbourhood is a misleading concept. We do not believe that many people would be prepared to walk for twenty minutes for access to their local shops and services. Ten minutes is a more realistic maximum walking time, which (for reasonably fit people) equates to one kilometre. Beyond that distance, most people would drive or catch public transport. If our supposition is true, then higher density housing should be confined to within one kilometre of an activity centre, preferably one served by frequent public transport.

A 20 minute walk city needs the population cohorts (or market segments) to be defined. For example, the 20-minute walking distance in an urban environment for a 65+ person is very much less than that for a teenager.

We refer the readers to the TCPA 2013 submission (page 22) in its discussion addressing the topic heading 'Principle 6: A polycentric city linked to regional cities'. The points made there are still relevant.

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

Strongly Disagree

Disagree

Agree

Strongly Agree

Please explain your response:

Partnership with local government is crucial. There needs to be a shared vision for how Melbourne is to develop. Councils and State Government need to meet to reach agreement on where future development is to occur within the UGB.

Probably the micro-climate in terms of heat island impact needs more discussion. Shade, sunshine and wind effects of urban form need addressing. The issue of tree cover needs clear definition.

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

The environmental carrying capacity of Victoria, and of the Melbourne region in particular, should be discussed, and should be used to inform decisions about where and how much future urban growth is to be accommodated.

The quantified health impact criteria to be achieved by the integrated land-use and transport system(s) need specification.

Government does need to acknowledge that there are limits to growth, these limits are well researched and documented and need to be reflected in government policy.

Chapter 3: Delivering jobs and investment

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

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

Option 21A: Focus planning for National Employment Clusters on core institutions and businesses

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

Which option do you prefer?

- Option 21A
 Option 21B

Please explain why you have chosen your preferred option:

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

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

Why?

It would facilitate better integration of East Werribee into Werribee. East Werribee is a classic edge city development predicated on car access. It is poorly sited for train access, particularly for travellers from Geelong. If the ambition of creating 58,000 jobs is fulfilled, some form of high capacity rail transport will be needed to connect East Werribee not only to the Werribee and Wyndham Vale train stations, but also to other activity centres in the western suburbs, such as Melton. People-intensive jobs would be better located near to Werribee train station (and also at other, more accessible western suburbs activity centres such as Sunshine), while business employing few people but occupying large areas of land should be located near the Werribee bypass and major access roads.

To complement these added high-capacity rail services, new high quality-of-service (QoS) cross-suburban public transport (PT) networks will be required to reduce the level of car-based trips that the expanded metropolitan activity centres, such as East Werribee, would generate. Light rail (LRT), bus rapid transit (BRT), or even the Vancouver Skytrain mode would be candidate modes of PT for this “cluster and connect” development of major metropolitan activity centres (MMACs) interconnected with the PT network.

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

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

Why?

It would facilitate better integration of the Dandenong city. Following the “ABC” design principles for sustainable cities as enunciated and practiced by the Netherlands, people-intensive businesses and activities should be located in Dandenong city, whilst businesses employing few people (and transporting goods) should be located in Dandenong South, near to major roads and freeways. Treating the Dandenong area as a whole would allow for the appropriate location of employment types.

13. The discussion paper includes options (options 24 to 30, pages 33 and 34) that consider the designation of activity centres and criteria for new activity centres. Do you have any comments on the designation of activity centres or the criteria for new activity centres as outlined in the discussion paper?

We support the criteria set out in the discussion paper. The term “market gap” presumably means the absence of an activity centre where the 20-minute walk rule would mandate one, the location of existing activity centres having been determined by market forces alone.

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

It is necessary to protect Australia’s food production area from inappropriate development. In addition to providing food for the population, agricultural land provides major health benefits from a physical and mental point of view. In addition, the agricultural parcels provide a protected barrier to some native species thus providing an ecological sanctuary for those endangered and threatened species.

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

Whilst it is economically important to enable the extractive industries access to the land to ensure long term jobs prospects for Australians, it is equally important that all extractive industries ensure that land is properly remediated at the completion of the extraction process. This should include but not be limited to, site remediation and removal of all substances that could be harmful to people and the environment in the short, medium and long term.

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

The strategic choices for expanding central Victoria's sea ports have yet to be determined, and these choices will have long term and major influences on logistics and industrial site clusters. Some of the issues are:

- (a) What changes to trade routes can we expect climate change to make?
- (b) What impact can we expect on ports as Victoria loses its vehicle manufacturing industry - e.g. imports without return exports?
- (c) Will Brisbane take advantage of the shift and replace Melbourne as the biggest container port? - **Asian trades can save 10 days by omitting Sydney, Melbourne and Adelaide if a half decent rail connection existed.**
- (d) How will a fully functioning NBN impact trade?
- (e) Infrastructure lead times are long, and some ports must already be looking at all these issues.

The jobs future will be shaped by a wide array of global changes. At this stage our government has spent little time evaluating the kind of future we should be planning for. At the very least it should develop a range of likely scenarios that will force people and governments to adapt to.

Chapter 4: A more connected Melbourne

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

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

Why?

It is absolutely critical that locations for high density living and jobs be situated near access points to the principal public transport network (PPTN), both existing and planned. Including the PPTN in Plan Melbourne 2016 will highlight gaps in the network and poor land-use location decisions.

We refer the readers to our discussion, on page 24 of the TCPA 2013 submission, about better connecting a polycentric metropolis under the heading 'Idea 4: Providing a transport system for Melbourne's future'.

Integration of land--use and PT systems and active personal transport (walking and cycling) is critical to plan for predictable and unpredictable social and technology change. This is also a core tenet of TFM's position and advocacy.

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

The development of high quality bicycle routes throughout the metropolitan area should be a goal of the Plan. Because they are cheap to construct, and require very little land, reservations should be made early, and construction should be given the highest priority.

Benefit-cost ratio (including health benefits) should be sufficient reason to ensure priority is given to active transport modes. The bicycle network in Bogota (Colombia) is a great example of what can be done. Road layouts in new residential subdivisions should prioritize cycling and walking routes between homes and local activity centres, public transport access points (stations and stops) and other trip generators. Secure bicycle parking should be provided at stations, activity centres and workplaces.

Enough space is needed to separate pets, cyclists and vehicles. Safely separating pets from cyclists is as important as separating cyclists from vehicles. There are many 20 and 30 km zones in the world.

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

There is too much emphasis in the discussion paper on big-budget projects that leave little or no resources for low-cost initiatives. Active transport is low-cost, and should be prioritized above big-

budget items such as metro rail and Tullamarine Freeway widening. There should be a commitment in Plan Melbourne 2016 to use objective criteria, including benefit-cost ratio, to determine the priority of projects. There is no mention of benefit-cost ratio in the discussion paper.

Opportunities for health benefit need to be built into project investment scenarios. Health impact statements combined with LCA are a must.

Chapter 5: Housing

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

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

Intuitively, this seems like a reasonable split, but we would like to know its basis. Is it simply a figure plucked out of the air, or does it somehow represent the ratio of brown-field to green-field land available for development, and the likely density of that development? What could be done if trends showed the target wasn't being met? What options would be available if the supply of brownfield or greenfield land dried up, given the commitment to a permanent urban growth boundary?

As well as setting a target for the proportion of new housing in established and new areas, a target should be set for the area of new land to be preserved (undeveloped) to be available for future development beyond the life of this plan. This would impose some density requirements on greenfield development. Both greenfield and developed land is a fixed supply within the UGB, and needs to be used economically.

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

Implement a "yellowfields" land in-fill redevelopment planning strategy: A more deliberate, even pro-active program with a strategy is needed to identify "yellowfields" areas, enact planning zone changes, then foster the aggregation of land title sites in these yellowfields areas by developers, investors and/ government agencies. In the MAC Discussion Paper, the term "greyfields" is used, which is the same as the TCPA's concept of "yellowfields".

Land inside the Melbourne metropolitan UGB that could be restructured can be "greenfields" (essentially virgin or agricultural land), "brownfields" (land already intensively built-over for intended purposes, but whose uses have now all but ceased) or "yellowfields" (built-over land still used for the purposes for which it was developed, but whose intensity and value of use have declined). These colour connotations evoke the life cycle of tree leaves.

Such a yellowfields planning strategy would complement a metropolitan planning strategy to redevelop brownfields land areas, and precincts already zoned or planned to receive high-density infill redevelopment such as town centres next to metro rail stations.

Yellowfields (or greyfields) are built-over land still used for the purposes for which it was developed, but whose intensity and value of use have declined). Yellowfields are not always easy to identify and they are certainly harder to restructure and redevelop than brownfields precincts. South Melbourne's industrial zone along the Yarra's south bank was an obvious case. For example, in or near the "Monash employment cluster" region, there are considerable areas of yellowfields residential and commercial land stocks, particularly surrounding Oakleigh's central business district,

and in Huntingdale and Clayton, especially straddling North Road. Some brownfield land lies adjacent to Oakleigh station and along the north side of the Gippsland railway to Huntingdale. The TCPA refers to this in its website at <http://tcpa.org.au/> in the TCPA's submission in 2012 to the proposed amendment C154 (Chadstone Shopping Centre expansion) to the Stonnington CC Planning Scheme, at <http://tcpa.org.au/wp-content/uploads/2014/09/TCPASubmissionChadstoneSC.pdf>.

Reforms to state taxation instruments would also assist land parceling in regions designated for infill in the metropolitan planning strategy and in municipal planning schemes within the PEA. Stamp duty in particular is a serious "friction" tax which inhibits individuals, households, businesses and land developers in acquiring titles to land. The TCPA discusses possible changes to state taxation below in section 48. Reform of Victorian state taxation, on page 27 of this submission.

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

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

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

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

It may be necessary to compulsorily acquire housing that is reaching the end of its life, to enable comprehensive development at a higher density. Piecemeal acquisition of property by developers is a slow process that can depress the market value of surrounding properties and blight the street with unkempt gardens and derelict houses. The final outcome is not necessarily an ideal development that fits in with its surroundings. Perhaps the Urban Land Authority could be resurrected to assemble sites for redevelopment. Part of its remit could be to assist households whose properties have been compulsorily acquired to relocate.

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

Option 37A: Setting housing targets for metropolitan Melbourne and each sub-region relating to housing diversity, supply and affordability.

Option 37B: Developing a metropolitan Housing Strategy that includes a Housing Plan.

Which option do you prefer? Choose one option:

- Option 37A
- Option 37B
- Other

Why?

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

Plan Melbourne should identify areas for re-development at higher density and leave it to local government to identify individual buildings (and streetscapes) within those areas that are to be protected on the basis of their character.

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

Suburbs could be largely protected from redevelopment by focusing redevelopment along main roads that are serviced by trams, LRT, BRT, and in the vicinity of railway stations and shopping centres.

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

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

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

Which option do you prefer? Choose one option:

- Option 40A

- Option 40B
- Other

Why?

We prefer option 40A because it allows greater flexibility. We do not believe it will be necessary to redevelop 50% of suburban land to accommodate 70% of the expected growth in housing demand. The target that should be set is the number of new housing units to be created within the existing developed area (i.e. not including new land), distributed according to guidelines for preferred locations.

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

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

Option 45A: Consider introducing planning tools that mandate or facilitate or provide incentives to increase social and affordable housing supply.

Option 45B: Evaluate the affordable housing initiative pilot for land sold by government to determine whether to extend this to other suitable land sold by government.

Option 45C: Identify planning scheme requirements that could be waived or reduced without compromising the amenity of social and affordable housing or neighbouring properties.

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

Remove stamp duty, and replace this revenue source with an annual taxation on all properties. This tax would be similar to the municipal rate formula of Capital Improved Valuation, but with specific modifications. See TCPA's analysis in section 48. Reform of Victorian state taxation, on page 27 of this submission.

30. Any other comments about chapter 5 (housing)?

Chapter 6: A more resilient and environmentally sustainable Melbourne

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

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

It is important that developments that occur in Melbourne are not in contradiction to environmental principles. Ecologically sustainable development (ESD) should be the overarching principle governing all development in Melbourne. It is quite clear that ESD principles have been ignored in much building development over recent decades; indeed, there has been a retreat from ideas such as passive solar design, that were taking hold in the 1970s.

Recognition of the risk of sea level rise and more frequent storm surges needs to be built into the planning of low-lying coastal land, including areas such as Fisherman's Bend.

The environmental and consequential health impact of almost total reliance on road freight to and from the Port of Melbourne – traffic congestion, air pollution and noise, amongst others – needs to be weighed against the cost of building freight rail lines to the port. Poor transport decisions affect the quality of life in Melbourne and threaten its attractiveness as a place to live and work.

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

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

Because the Australian economy is only a small part of the global economy, Australia can have very little direct impact on the rate of global warming. Plan Melbourne must therefore prepare for any likely contingency arising from global warming, including sea level rise, changes to rainfall patterns that affect water supply, hotter summers, etc.

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

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

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

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

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

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

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

Key aims of the TCPA when it was founded were “to give the town a bit of the country, and the country a bit of the town, to secure better housing, to protect existing parks, to safeguard native animals and plants”. The presence of and access to flora and fauna reserves throughout the metropolitan area would be of psychological benefit to people as well as to the flora and fauna.

37. The discussion paper includes options (options 53 and 54, pages 78 and 79) to introduce strategies to cool our city including: increasing tree canopy, vegetated ground cover and permeable surfaces; use of Water Sensitive Urban Design and irrigation; and encouraging the uptake of green roofs, facades and walls, as appropriate materials used for pavements and buildings with low heat-absorption properties. *What other strategies could be beneficial for cooling our built environment?*

Higher thermal insulation standards for new buildings would reduce the need for air conditioning, which is responsible for much of the waste heat in cities.

Encouraging walking or cycling as substitutes for car travel would reduce waste heat from vehicles.

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

Strongly Disagree

Disagree

Agree

Strongly Agree

Why?

This should be an objective that applies to the whole of Victoria, and is not dependent on location.

39. The discussion paper includes options (options 56B and 56C, page 80) to strengthen the structure planning process to facilitate future renewable and low-emission energy generation technologies in greenfield and urban renewal precincts and require consideration of the costs and benefits of renewable or low-emission energy options across a precinct. *Do you agree that the structure planning process should facilitate the uptake of renewable and low-emission technologies in greenfield and urban renewal precincts? Choose one option:*

Strongly Disagree

Disagree

Agree

Strongly Agree

Why?

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

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

Why?

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

Chapter 7: New planning tools

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

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

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

Chapter 8: Implementation

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

Yes, provided that the short term implementation plan is consistent with the long-term strategy, and isn't simply a rationalization of projects that were already in the pipeline, regardless of the strategy. All pre-existing plans for infrastructure or land development should be evaluated for consistency with the strategy.

Whilst long term goals are highly desirable, it is difficult to hold future governments to account on them. Much stronger and more binding commitments are required to ensure short term goals, that elected governments can be held to account. This requires the establishment of transparent and measureable outcomes and milestones.

46. If a separate implementation plan is developed for Plan Melbourne 2016 what will make it effective?

47. Any other comments about chapter 8 (implementation)?

ADDITIONAL ISSUES NOT WITHIN THE MAC'S TEMPLATE OF ISSUES

48. Reform of Victorian state taxation

TCPA supports “in-principle” the exploration of new ways to fund a significant backlog of community infrastructure and future infrastructure requirements through both available planning system mechanisms (such as value capture and the wider application of Development Contribution Plans) and broader beneficiary pays techniques (such as a low rate Metropolitan Improvement Levy). (Cited in p.(v) of the executive Summary in ‘Plan Melbourne 2015 Review - Report by the Ministerial Advisory Committee, June 2015’).

We note the Grattan Institute’s endorsement-in-principle for replacing state stamp duty on land transactions with an annual broadly-based levy or tax on legally-titled properties. (Referenced at <http://grattan.edu.au/report/property-taxes/>). TCPA recommends that annual taxation on properties should follow a formula that is oriented close to the Capital Improved-Value (CIV) of each property, a methodology in use by all but 6 of Victoria’s municipalities.

In the TCPA 2013 submission on page 24, we addressed the issue of reform of state taxation in our response to the query heading ‘*Can living locally be achieved?*’ under the Principle 7 sub-heading ‘*Key issues raised in research and consultation*’. The TCPA reiterates those propositions in this submission to ‘Plan Melbourne Refresh’ 2016.

APPENDIX – OUTLINE BY ‘TRANSPORT FOR MELBOURNE’ OF KEY ISSUES IN TRANSPORTATION IN MELBOURNE

Transport for Melbourne - Key issues

The Key Points of this Submission

The key points of Transport for Melbourne’s submission are listed below and then separately discussed later in the document.

General

1. That the refresh document does not include policy and principles to be applied in the overall plan of Melbourne to achieve seamless travel and connectivity between different modes of public transport – a vital component of urban planning and an obligation under the “Transport Integration Act 2010
2. That the refresh document does not articulate the key drivers of best practice public transport network planning as a basis for successfully meeting customer needs and, through building user confidence, getting increasingly more people out of their cars for trips
3. The refresh document provides very little picture of the overall travel demands and patterns that plan will produce in future Melbourne and the implications for the public transport networks
4. The legitimacy of this consultation process is questionable. The consultation asks for our views on the transport components in Plan Melbourne Refresh, but the government has removed these, saying that they are already underway as part of a concurrent process.

Specific

5. Section 4.1. There is no commitment of action toward seamless travel (frequency and connectivity). It is fundamentally infrastructure and asset based efficiencies that will not on their own deliver for the transport user and build patronage in lieu of car trips.
6. Section 4.1. Infrastructure Victoria has a role in public transport planning, but there is no corresponding advisory committee on the approaches and operational solutions to achieving Victoria’s transport planning obligations under the “Transport Integration Act 2010. The refresh document is silent on how the obligations will be dealt with and how they are to be coordinated with the other planning inputs to achieve a sound Plan Melbourne 2016 (PM16).
7. Section 4.1. Trams/Light Rail. There is one bullet point, only, under rail and road projects that is merely a generalised statement that “Commitments to improving the quality and efficiency of the tram network remain”. One bullet point that fails to address the nature of future infrastructure projects, solutions for improved peak hour performance efficiencies and how improved existing services and extended networks will be developed to better support users and will complement the heavy rail and bus networks.

Discussion of the Key Points of this Submission

1. Seamless Travel and Connectivity

State governments of Victoria have for many years given priority to building new transport infrastructure above planning and delivering an integrated public transport service. A plan to serve the mobility needs of the public must form the context within which priorities for infrastructure are considered. The mobility plan must implement the Transport Integration Act, Victoria (2010) which states:

'The transport system and land use should be aligned, complementary and supportive and ensure that – transport decisions are made having regard to the current and future impact on land use, land use decisions are made having regard for the current and future development and operation of the transport system' (section 11).

'The transport system should ... facilitate integrated and seamless travel within and between different modes of transport' (section 12)

The Plan Melbourne Refresh document only tackles integration from an infrastructure point of view; not an operationally seamless connectivity point of view. The PM16 should provide the principles to be followed toward achieving a high frequency, integrated public transport service that attracts people away from car use. The PM16 plan should outline steps to improve the service continuously and provide for transparent and easily understood reporting of the implementation of that plan.

Transport for Melbourne has developed a "Transport Charter" that provides many of the principles and steps that will lead to improved and seamless travel across Melbourne and will be essential to achieving 20 minute neighbourhoods. It is requested that these principles, steps and system and operational approaches be enshrined in PM16.

TRANSPORT CHARTER

1. The Government of Victoria should implement the Transport Integration Act (2010) by adopting a mobility plan for Melbourne which includes the integration of train, tram and bus services.
2. The mobility plan must give absolute priority to the needs of the customer, and must seek to attract new customers away from the car.
3. The customer focus demands clear, uniform and universally available real time information about train, tram and bus routes and timetables, so that at any point in the system, a potential customer knows precisely what service goes to which destinations and when – and how and where to connect with other services across the network.
4. The public transport system should be designed to provide high frequency service across the whole Melbourne metropolitan region, linking trains, trams and buses with cycling and walking connections.
5. In those areas of low population density that cannot support high frequency train services (at less than 15 minute intervals) the timetables of trains and buses should be linked to enable rapid interchange between trains and feeder bus services. There should be no more than 5 minutes between the arrival of a local bus and the departure of the connecting service (train, tram or fast bus).
6. A metropolitan mobility plan requires comprehensive redesign and investment to create rapid and large scale improvements to the bus services, the only mode of public transport that can provide a high frequency service to outer Melbourne. This means:
 - a. providing a service with completely dependable routes and timetables,
 - b. simple accurate information on bus service destinations,
 - c. speeding up current bus services by means of route and timetable redesign;
 - d. using new bus capacity to fill service gaps and improve frequencies;
 - e. providing road priority for buses to achieve faster travel times; and
 - f. linking buses with trains, trams and local activity centres via route redesign and timetable coordination.
7. Information about public transport routes and timetables must be easy to obtain at every stop, uniform in presentation and easy to understand.

8. There should be a medium term plan to improve the metropolitan heavy rail service on the basis of 21st century infrastructure for tracks, signalling and interchange stations. Today's basic operational infrastructure is obsolete and dysfunctional. Track conditions need to be radically improved. The signalling system must be upgraded for best practice reliability and high capacity. There must be rolling investment in station redesign to make stations attractive to the public and efficient for train handling.
9. Road space needs to be made available to speed up trams, provide tram and bus priority in mixed traffic, bus-only lanes and safe cycle paths.
10. A plan to serve projected cycling needs across metropolitan Melbourne should drive new investment in bicycle infrastructure, putting safety for cyclists first, filling gaps in the bike path network, improved safety on the local road network, providing improved signalling at intersections, and secure storage at train stations.
11. Implementation of the service plan requires reform of Public Transport Victoria whose purpose should be clearly stated as follows: 'The purpose of Public Transport Victoria is to develop and deliver a service across the whole transport network that meets agreed service standards in order to facilitate integrated and seamless travel within and between different modes of transport, as legislated in the Transport Integration Act'.
12. The service plan should be generated by a dedicated team with executive authority to ensure full implementation. The team should be led by and comprised of experts with demonstrated ability to plan and reform high performance and high efficiency public transport networks, such as for example, in Zürich, Hamburg or Munich.

The above principles (Transport for Melbourne Charter) need to be enshrined into Plan Melbourne 16, including clear information on the processes for ensuring that all planning and projects are considered against these principles. Further, which agencies are to take responsibility for this and how the other agencies will be work in cooperation needs to be also clearly articulated.

2. Key Drivers Of Best Practice Public Transport Network Planning

The ability to deliver an excellent public transport plan will ultimately depend on the skill and expertise of transport planners within the bureaucracy, and the extent to which management and organization structures enable them to perform their role.

The new management must be able to implement fully the intention spelled out in the Transport Integration Act (2010) enacted by the Brumby Labor Government:

Section 2b. The transport system should facilitate network-wide efficient, coordinated and reliable movement of people and goods at all times.

Section 2c. The transport system should – facilitate integrated and seamless travel within and between different modes of transport.

At present, the expressed intent of the Act is not being met at an acceptable level.

The above section of the Transport Integration Act was derived from world-wide analysis of best practice public transport network planning. The key document for this practice is called the HiTrans Guide, prepared for the European Commission, particularly Volume 2, 'Planning the Networks'. In turn the organizational model recommended is based on the 'Transport Community' concept developed in Switzerland and northern Europe (in German *Verkehrsverbund*). The Transport Community brings together transport planners, service providers (rail, tram and bus companies) and

representatives of the community, the aim being to obtain benefits to all parties flowing from a total network approach.

Melbourne's public transport planning agency, PTV, should adopt a single overarching goal to operationalise the above commitment of the Transport Integration Act:

The purpose of Public Transport Victoria is to deliver a timetable across the whole transport network that meets agreed service standards in order to facilitate integrated and seamless travel within and between different modes of transport, as legislated in the Transport Integration Act.

Key steps toward achieving this should be articulated in PM16.

Below is a summary of points from HiTrans Guide No. 2. This guide is well accepted across Western Europe as best practice in pursuing integrated, attractive, patronage successful public transport¹.

Compete with the car

Design a public transport system that is able to be a competitive alternative to motor car travel.

Define the network planning tasks

Network planning is diverse and complex: the goals and objectives should be clearly stated, and the relation between the objectives and the use of limited resources should be considered

Understand the market and the users

Good understanding of the user and non-user demands is a prerequisite for the development of an attractive and competitive network.

Determine the network structure

The design of network structure involves making selective choices and solving important dilemmas. Local circumstances and political objectives are often decisive. The essence of good practice is the concentration of passenger flows onto specific lines of movement. Transfer between modes is an inescapable fact of many of the public transport journeys. Consequently how interchanges are designed, and how services are organized and presented is at the heart of the overall strategy for improving public transport.

Learn from institutional reforms

Clear trends emerge from public transport markets around the world. While there has been a greater role for the private sector in the provision of urban transport services, the transport (governmental) authorities have typically retained the initiative in planning the network, integration of services, and specifying the quality of the product.

Be aware of the institutional factors behind good practice

All large urban regions with success in public transport have a strong regional organization that integrates public transport services into regional networks and policies.

Gain broad support for public transport development

Support is based on trust and confidence which comes from living up to public expectations. Quality solutions and efficient use of resources are prerequisites.

¹ HiTrans Best Practice Guide Vol. 2: Public Transport – Planning the Networks (authors: Gustav Nielsen with John D. Nelson, Corinne Mulley, Göran Tegner, Gunnar Lind, Truis Lange) European Commission Interreg IIIB Program

Design a network that combines structural stability with market adaptability

The public transport system should be able to adapt dynamically to the changing demands of the citizens. At the same time, long term stability of a high service quality is required for the public transport system to influence urban development and create more sustainable transport patterns.

Exploit the network effect

Two crucial qualities of the system are: short waiting time between departures, and an integrated network of services between all areas of significant transport demand. Network planning must find ways to concentrate resources to a sufficient number of high frequency lines that form a travel network that caters for a major part of the demand for motorized transport in the city region. Planners should try to achieve optimum frequencies of between 6 and 12 departures per hour. This will allow a majority of users to 'forget the timetable'.

Create a simple high frequency network

When fast and reliable routes are established all over the city region, the network should be developed with as few, continuous and high frequency lines as possible. In general 'pendulum' lines should be preferred.

Find strategies for weaker markets

The main service solution to the problem of lower demand (from more dispersed urban areas) is the integrated network with 'pulse timetables'. This will minimize waiting times at interchanges and secure a maximum of travel opportunities for a limited amount of operational resources. The good design of interchange points is a crucial factor in the success of network planning for dispersed urban regions.

Make services as fast and routes as short as possible

Travel time is a major consideration when people choose to go by public transport, or not. Network planning should seriously consider all possibilities for speeding up services, including: road network design, priority traffic management and control through bus lanes, priority traffic signals etc., ticketing systems, optimal location and distance between stops, differentiation and coordination between short (intra-urban and intra-suburban) and long journey services with appropriate variation in distances between stops, design of vehicles, design of stops, information management to influence customer behaviour.

Make use of analytical tools for assessment of solutions

High quality public transport can only be achieved through good decisions based on analytical assessments of solutions founded on sound theory and precise knowledge of the real world. Mechanisms to be implemented to fully understand current travel patterns, attitudes and behaviours and to monitor changes and to facilitate more accurate forecasts of future demands. Need ongoing program of surveys of and effective data bases and modelling tools. Need to monitor and learn from overseas developments.

It is requested that the above approaches be articulated into PM16 in a way that imposes a commitment at all levels of transport planning to its fundamental principles.

3. No Overall Travel Demands and Patterns in Plan Melbourne Refresh

Travel demand projections are based on work carried out many years ago. These need to be updated. New research work will be required to do this.

4. The legitimacy of the Plan Melbourne Refresh Consultation Process is Questionable

The legitimacy of this consultation process is also questionable. The consultation asks for our views on the transport components in Plan Melbourne Refresh, but the government has removed these, saying that they are already underway as part of a concurrent process. It does not tell us what this concurrent process is, or who is responsible, or what is being considered. How can we be consulted on something which the government will not tell us about?

The June 2015 Ministerial Advisory Committee (MAC) review made a number of detailed recommendations on "A more connected Melbourne", but Plan Melbourne Refresh refers these recommendations "for consideration as part of transport network planning". The government makes it clear that policy should be "guided by Victoria's transport planning obligations under the Transport Integration Act 2010... and in the context of advice from Infrastructure Victoria" (p.42).

Therefore on the one hand the government is saying that transport is not to be considered in detail here, and it is also saying that it should be guided by the TIA 2010, which requires that transport and planning strategy are considered together. How can it be both?

This means that the government is not meeting the objectives of the TIA 2010. It also devalues this consultation.

The government rejects the MAC proposal to consider 'transit corridors', but instead proposes to integrate the refresh of the Principle Public Transport Network (PPTN) into Plan Melbourne 2016 (p.43). No more information is given on the PPTN, none is available online, and therefore how are we meant to respond in this consultation?

5. No Commitment Of Action Toward Seamless Travel

Public infrastructure should underpin every civil society and support a wide range of services that are highly valued by the broader community. Much of the discussion on infrastructure tends to be about physical infrastructure but its value generally lies not in the infrastructure itself but in the quality of services it supports, and the social infrastructure that uses it - which is also the area where most of the jobs from infrastructure investment are generated.

Viewed from an economic perspective, physical infrastructure tends to be a cost generator (to supply, maintain and manage) whilst services provided by it generally (but not always) and the social infrastructure it supports are the principle source of benefits. It follows that maximum returns on community investment are provided by minimising the cost of physical infrastructure itself, maximising its utilisation in terms of efficient, effective and appropriate use and minimizing inappropriate use and its associated costs.

Notwithstanding that a number of the committed large public transport projects will be necessary; a major focus of public transport planning should be investment in less expensive operational solutions

to create seamless and reliable transfers from transport modes. The nature of this investment includes, but is not limited, to the following:

- Redesign and development of a new bus network
- Provision of supporting infrastructure and expanded bus fleet
- Implementation of road priority for buses and trams
- Implementation of rail operating improvements
- Strategic investment in rail and tram infrastructure such as track and signaling upgrades
- Customer service and passenger information improvements/upgrading etc. |

6. Victoria's Transport Planning Obligations under the "Transport Integration Act 2010"

The purpose of the Transport Integration Act is to "...create a new framework for the provision of an integrated and sustainable transport system in Victoria...". See https://en.wikipedia.org/wiki/Transport_Integration_Act_2010_-_cite_note-3. The Act broadly seeks to unify all elements of the Victorian transport portfolio to ensure that transport and land use agencies work together towards the common goal of an integrated and sustainable transport system.

The Planning Melbourne Refresh should be showing how this is to be achieved and the processes to be followed as a guide to all the government agencies in pursuing the aspirations of PM16.

Merely listing out the infrastructure projects and mentioning the Act is not sufficient. Guidance at the level of PM16 must be given on the methods of agency collaboration to meet the obligations of the Act leading to sound planning decisions. This should also include advisory committees on public transport network connectivity with relevant and experienced members drawn from the professional community.

7. Tram/Light Rail Improvements and Connectivity

The information on planning for trams or light rail is inadequate and out of balance to information, in terms of infrastructure projects, for rail and road. Given that Melbourne has the largest tram network in the world, the forward investment in new rolling stock and its importance as an efficient mass people mover.

Unlike heavy rail and roads, there are no specific tram and light rail infrastructure projects articulated in the document. There is also silence on the approaches that need to be taken to improve punctuality on congested roads, where and why routes will be extended or new routes developed against alternative modes.

Moreover, there is still little effective tramway connectivity with the metropolitan rail network and, where this does occur (e.g. in the CBD), it has been more by historical accident rather than by design. The same lack of designed connectivity occurs in most cases where it interfaces with the bus network. As with heavy rail and bus the report is silent on how connectivity should be pursued in the growth of Melbourne, the likely impacts on land use and how the Victorian agencies should integrate this into decision making on Melbourne's growth and development.

8. Implementation

Milestones and transparent and measurable outcomes will be required to ensure the policy and principles outlined above are implemented. Some of these will include planning goals and milestones for the development of a new bus network, the development of an integrated timetable and operating efficiency improvements. The definition of on time running needs to change i.e. 0-1 minute for all modes of public transport. Targets for vehicle breakdowns, infrastructure failures, on time running, vehicle running speeds, modal connectivity (time) and a range of customer service improvements etc. need to be established and made available, not just to government but also to the public.

In Summary

The document, and in particular Section 4, is weighted toward transport infrastructure solutions and not the, equally if not more important, operational solutions. Infrastructure and increased assets (e.g. rail and road vehicles) will not on their own deliver improvements for the existing transport users, support urban growth and build patronage in lieu of car trips.

Seamless public transport connectivity is a fundamental building block for the successful forward planning of Melbourne. Certainly key large scale projects are required, but infrastructure alone will not provide connectivity improvements leading to increased confidence for the traveller and sustainable growth in patronage. Seamless connectivity between transport modes is essential to drive passenger growth and move more people off the road. In particular, redefined bus routes providing the traveller with real time electronic information and reliable connectivity with trains/trams is necessary to realise the transport component of the 20 Minute Neighbourhood in much of mid and outer Melbourne.

Plan Melbourne Refresh merely addresses infrastructure projects and, to a minor extent, transport corridors without including the principles, approach and steps to meet the obligations under the Transport Integration Act, Victoria (2010). The document provides no guidance on how the Victorian Government agencies are going to cooperate in meeting the obligations of the Transport Integration Act.

For Further Information

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