

Submission by the Town and Country Planning Association in response to the Discussion Paper for the Metropolitan Planning Strategy for Melbourne

Melbourne, March 2013

About the Town and Country Planning Association

The Town and Country Planning Association (TCPA) was founded in Victoria in 1914, and is an incorporated association registered under the Victorian act.. TCPA is a non-profit organisation funded by members' subscriptions; it is not affiliated with, or supported by, any party political organisation. Amongst the objectives of the TCPA are:

- To promote the application of principles of ecological sustainability to existing and new settlements and urban regeneration;
- To encourage the practice of environmental planning;
- To advocate the establishment of an effective strategic planning framework.

The TCPA's Charter for Planning sets out the association's philosophy in action in detail. The Charter can be read at <http://www.tcpa.org.au/> by clicking on the link labelled 'Download the TCPA Planning Charter (PDF)' at the bottom of that page

In this document, the TCPA's comments are set out in text boxes formatted similar fashion to the introductory paragraph above.

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Executive Summary

Introduction

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Principles guiding the discussion paper

What we want to achieve	Principle 1: A distinctive Melbourne Principle 2: A globally connected and competitive city Principle 3: Social and economic participation Principle 4: Strong communities Principle 5: Environmental resilience.
What needs to change	Principle 6: A polycentric city linked to regional cities Principle 7: Living locally – a '20 minute' city.
Making it happen	Principle 8: Infrastructure investment that supports city growth Principle 9: Leadership and partnership.

The TCPA suggests the following principles:

1. Urban centres will be located on the existing or planned fixed rail network, or on super-bus routes designed to operate like fixed rail transport (e.g. Curitiba, Bogota bus systems).
2. Urban centres will lie on radial spokes, following the existing rail pattern, but will also be connected laterally by circumferential public transport services (generally buses or light rail).
3. Sectoral centres will be located where radial rail services converge (e.g. Footscray, South Yarra).
4. Ribbons of higher density will be located along public transport routes between centres.
5. The MPS should offer alternative scenarios, rather than a single "master plan", so that members of the public can indicate their preferences, possibly selecting a combination of aspects of alternative scenarios. For example, there could be a heavy emphasis on the development of radial corridors, or, alternatively, an emphasis on circumferential corridors (e.g. Eastlink). There could be an emphasis on developing one urban centre as a second CBD (such as the proposed Werribee East, or Dandenong), or several smaller CBDs.
6. The MPS should have sufficient flexibility to allow for unanticipated changes in public preferences, economic developments, environmental circumstances, and so on.
7. The MPS should include ongoing research into future trends that may require plans to be modified. For example, the impact of on-line purchasing through the Internet on traditional retail trade may lead to reduced demand for retail premises.
8. The MPS should seek to ensure that some old shops and warehouses in inner city locations can be retained for use by newly-established small businesses. The example of how Newcastle (NSW) successfully dealt with the high number of vacant shops that resulted from industrial disinvestment is instructive.

Opportunities and challenges

Melbourne, as Victoria's capital city, is the gateway between regional cities and rural Victoria, Australia and the world. Victoria's competitiveness and success depends on Melbourne's success.

Melbourne's attractiveness and liveability:

The TCPA believes that part of the attractiveness of a city lies in its aesthetic qualities - its beauty. The strategy should make it a goal to improve Melbourne's appearance. Detailed objectives could include such things as:

- the removal of overhead powerlines
- greater use of public art
- more emphasis on urban design - the design of the public realm and its interface with private space and private property
- the creation of public spaces: for example, at significant intersections, such as St Kilda Junction
- stricter controls on outdoor advertising

Asia is becoming more affluent and more important.

Globalisation will bring challenges and opportunities

By 2050, Melbourne's population is likely to reach between 5.6 and 6.4 million.

The demographic changes that Melbourne will face in the years ahead are profound:

Melbourne is becoming geographically larger.

With a growing population will come the need to boost employment and build new facilities, shops, schools and housing.

Jobs will shift in location as old industrial uses continue to leave inner Melbourne and employment locations change.

Transport systems in Melbourne have benefitted from far-sighted past plans that have set aside reserves for new connections. The Metropolitan Planning Strategy will include a vision for Melbourne's transport system.

The TCPA strongly believes a transport plan that is predicated on a land-use plan is essential.

Commuting times and distances are in danger of blowing out due to disconnection between housing and jobs and there is growing congestion on roads and public transport.

The TCPA observes that a long commuting time acts as an incentive to seek work closer to home. Freeing-up congestion by building freeways simply allows people to commute longer

distances. Congestion pricing in areas well served by public transport is one way of managing congestion. Revenue from congestion charging should be used to improve public transport services.

Development and urban renewal in an expanded Central City will be at a scale not previously contemplated.

The redevelopment of Fisherman's Bend should be accompanied by an expansion of public transport services commensurate with the number of employees and residents to be accommodated in the area. Consideration should be given to building an underground railway to service Fisherman's Bend, possibly as an extension of the proposed Doncaster railway.

Affordable living will become a critical factor, requiring better integration of jobs and housing.

A number of financial challenges will have an impact on resources available for infrastructure and services to support growing and changing communities, attract more investment and reinforce our city's globally competitive status.

What do we want to achieve

The Discussion Paper addresses the key issues under the nine principles. The first five principles set out what most people value about Melbourne.

Principle 1: A distinctive Melbourne

Principle 2: A globally connected and competitive city

Principle 3: Social and economic participation

Principle 4: Strong communities

Principle 5: Environmental resilience

What needs to change

Principles six and seven begin to define how Melbourne should be managed within a spatial context at a metropolitan scale and local scale.

Principle 6: A polycentric city linked to regional cities

Activity centre policy, which has underpinned Melbourne's metropolitan strategies for several decades, takes the location of retail premises as its starting point. This approach has helped support vibrant local activity centres that meet local and regional needs. Activity centres are important for local communities but in terms of planning Melbourne's overall form the Strategy should now focus on jobs as the starting point.

Initial urban form modelling suggests that a 'polycentric' city can perform best in terms of increased public transport use and reduced traffic congestion. A polycentric model for Melbourne would include:

- the Central City
- inner Melbourne as a distinct pattern of activity
- national employment and innovation clusters
- a limited number of high level suburban service centres.

Better integration of Melbourne with regional cities will provide more opportunities for all Victorians.

Ideas and aspirations for a polycentric city linked to regional cities are:

Idea 1: Growing the Central City as the anchor of a world city

Idea 2: Building national employment and innovation clusters

TCPA query here: Why national? Any examples of existing national employment clusters? Does this not require national planning?

Idea 3: Unlocking capacity in established suburbs

Idea 4: Providing a transport system for Melbourne's future

There is a clear desire for a comprehensive vision for a sustainable transport system in Melbourne that moves beyond specific projects.

Idea 5: Strengthening the green edge to Melbourne

Melbourne should consider strengthening its 'green wedge' planning approach with a 'green belt'. It should be obvious where Melbourne stops and rural areas begin.

Idea 6: Building a state of cities

Victoria has the opportunity to better integrate Melbourne with a network of regional cities.

Idea 7: Extending Melbourne's boulevards – a civic legacy

Principle 7: Living locally – A '20 minute' city

The TCPA observes that in many middle suburbs that were built during the 1960s there are small neighbourhood shopping strips that have been largely abandoned by retailers and turned over to other uses, as a result of widespread car ownership and supermarket shopping. It will be difficult to reverse this process while these conditions persist. Increasing residential density in the immediate surroundings of such shopping strips might act as a catalyst to aid their revival as retail centres. However, proximity to public transport should always be a necessary condition for increasing residential density. Housing suitable for active retired people would be appropriate in such locations.

Ideas and aspirations for living locally – a '20 minute' city are:

Idea 8: Delivering jobs and services to outer area residents

Services need to be provided in a more timely manner to urban growth areas and established outer areas of Melbourne.

Idea 9: Providing diverse housing in the right location at a reasonable price

The debate about infill housing in Melbourne must move beyond the impact of villa units on suburban streets and address how we can deliver diverse housing, in the right locations, at a reasonable price.

Idea 10: Improving the environmental performance of suburbs

Melbourne is a suburban city and that will not change. The environmental performance of its suburbs can be dramatically improved.

Making it happen

Commentary by the MAC in its Discussion Paper:

The Metropolitan Planning Strategy must move away from regulation as the primary means of achieving planning outcomes. Instead, we need to invest in vital infrastructure to support city growth and social cohesion, and foster stronger partnerships between government, the private sector and the community.

The Metropolitan Planning Strategy should address the needs of local councils, business and communities. Melburnians will need to share the responsibility of implementing the strategy as well as share the benefits from such a strategy at the metropolitan and local levels.

Planning strategies cannot anticipate each and every opportunity that may arise over a 40 year timeframe. For example, strategies developed 20 years ago could not have imagined the impact of the internet and social media on connecting people. Private interests should be able to initiate innovative projects even if these projects are not contemplated by current planning controls. Private development can often recognise opportunities Government has not considered and systems should be established to better respond to these initiatives.

In a budget-constrained environment Melbourne needs to get the most value from its existing services and infrastructure and new funding frameworks will need to be developed to deliver needed infrastructure.

Melbourne is a key freight and logistics centre for Australia, but capacity at the Port of Melbourne is constrained. Melbourne Airport is curfew free and is on track to handle more than 40 million passengers. There is adequate capacity to increase the number of aircraft flying into Melbourne Airport for some time but more limited capacity to provide land-based access to the airport. Avalon Airport has plans to become an international airport and a further airport in the south-east should be investigated.

The TCPA proposes that long term infrastructure starts with identifying where future major “functional conduits” are likely (but not certain) to be needed, then setting aside the requisite spatial corridors in state and municipal planning schemes to host these future services.

Principle 8: Infrastructure investment that supports city growth

A single integrated land use, transport and social infrastructure strategy means ensuring that infrastructure investment supports sustainable land use patterns and drives productivity. A long-term infrastructure vision should address Melbourne’s competitive strengths. This plan needs to achieve improved access to jobs and services across Melbourne and support our competitive strengths. And there are some ‘big ticket’ items that we will need to deal with. Ideas and aspirations for infrastructure investment that supports city growth are:

Idea 11: Using investment to transform places

Major infrastructure investment results in transformative land use changes. In Melbourne, planning for major infrastructure investment needs to ensure that the best public outcomes – new jobs, housing choices, new open space and facilities – result from such projects.

Idea 12: Moving to a place-based focus for programs

In the past, many State Government programs have focused on meeting a specialised need or delivering one type of service. This has been the case for a range of projects, from transport to social services. We need to move to integrated place-based programs that focus on the needs of a particular area or community, instead of just one issue in an area that has multiple needs.

Idea 13: Identifying a long-term framework for metropolitan infrastructure

We need a long-term framework for delivering city shaping and community shaping infrastructure that includes transport, social, health, education, recreation and open space, and utilities.

Principle 9: Leadership and partnership

Good governance, strong leadership and collaborative partnerships are essential to the success or failure of a metropolitan strategy. Partnerships between Commonwealth and State Governments, State Government and local councils, public and private sectors, councils and their communities, are fundamental ingredients to achieve a positive future for Melbourne. Melburnians have a history of embracing change and being innovative in doing so. Through these responses we can provide new employment, housing, education, social and recreational opportunities.

Melburnians will need to share the responsibility of implementing the strategy as well as share the benefits from such a strategy at the metropolitan and local level.

To achieve this partnership approach we will need to talk and identify how best to carry out the necessary tasks of city and community building. The Melbourne of the future will need the assistance of the Commonwealth Government, the State Government, councils, the investment sector, the community sector and citizens. How we deliver infrastructure and services and how we create new places might differ to what we have done in the past. As a community we must be open to innovation and new ways of doing things while identifying public benefits as a prerequisite.

Ideas and aspirations for leadership and partnership are:

Idea 14: Developing partnerships and agreements

State Government and local councils share responsibility for the planning of Melbourne. The Commonwealth Government also plays a role with infrastructure investment and setting strategies. Cooperation can be improved – this can only be achieved by a partnership approach between councils and the State Government.

Idea 15: Developing good governance structures and processes to deliver the Strategy

There is a need to develop good governance structures and processes to deliver the Strategy. The roles and responsibilities of the Commonwealth Government and its agencies, State Government agencies, local councils and private parties need to be clear in the implementation of the Strategy.

Idea 16: Setting targets, measuring progress and publishing indicators

For too long many aspects of Melbourne’s urban system have gone unmeasured or unreported. Setting targets and aspirations will be central to the Metropolitan Planning Strategy

TCPA advocates that a clearer path of steps be written into the MPS that clearly and logically evolve from principles and philosophy to goals then to measurable objectives. Thus, the TCPA advocates the evolution of the high-level goals of the main principles (1 to 5) into more focused goals then into measurable (quantifiable) objectives. Idea 16 of MAC’s (Ministerial Advisory Committee) Principle 9 is strongly supported in principle.

Also, population forecasts are required, per decade, to provide physical planning goals and to minimise “incremental” subdivision planning approaches. According to the Discussion Paper, by 2050, Melbourne is expected to have 5.6 and 6.4 million people.

1. Introduction

The Victorian Coalition Government is preparing a new Metropolitan Planning Strategy for Melbourne. The Strategy will set a vision for Melbourne and Victoria, together with eight Regional Growth Plans that will plan for the future of the balance of Victoria.

The Strategy will be a planning, development and transport strategy

The purpose of this Discussion Paper

What people told us

2. Why do we need a Metropolitan Planning Strategy?

The TCPA believes that the time horizon of the year 2050 is commendable. The TCPA would suggest adding even longer time horizons, say “three score and ten years” to 2080, i.e. the entire life span of someone born today.

The MPS should also consider that the strategy should address detection and assessment of situational factors that could arise in these time frames. That is, the strategic environment, both anthropological (social) and the physical environment. Longer term availability of the basic inputs to large-scale urban living, e.g. energy, potable water, food production must be considered.

Keeping Melbourne liveable and globally competitive

No longer ‘business as usual’

Meeting our future needs

An urban development and transport vision

The TCPA believes that if travel times to central Melbourne from regional towns and cities can be made similar to travel times from outer suburbs, then there is no real difference, except that regional towns might engender a greater feeling of identity and community than a suburb on the fringe of Melbourne. 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 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. 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.

A framework for innovation

Achieving our potential and unlocking capacity

Within the broad concept of ‘net community benefit’ – which underpins planning in Victoria – the Committee has identified nine principles to inform the Metropolitan Planning Strategy. Five of these principles identify outcomes the Strategy needs to address, while the remaining four principles outline how these outcomes can be achieved.

The first five principles set out what the Committee believes most people value about Melbourne. The principles identify social and economic participation and Melbourne’s distinctiveness to complement principles on economic, social and environmental concerns to create a comprehensive view of the outcomes the Strategy needs to achieve:

- Principle 1: A distinctive Melbourne
- Principle 2: A globally connected and competitive city
- Principle 3: Social and economic participation
- Principle 4: Strong communities
- Principle 5: Environmental resilience.

These five principles should inform the Strategy and future detailed planning work. Principles six and seven make a start on defining how Melbourne should be managed at a metropolitan scale and local scale, based on economic considerations and employment locations. They are informed by concepts such as ‘living locally’ and ‘treading lightly’:

- Principle 6: A polycentric city linked to regional cities
- Principle 7: Living locally – a ‘20 minute’ city.

The final two principles describe how the Strategy could be implemented:

- Principle 8: Infrastructure investment that supports city growth
- Principle 9: Leadership and partnership.

3. What we want to achieve

This chapter explores in more detail the first five principles that should inform development of the Metropolitan Planning Strategy. For each principle we:

- explain why the principle is important and the current 'state of play' in Melbourne
- present key issues from research and consultation
- explore how these issues might be addressed in the Strategy, recognising that not all issues raised can be addressed by planning, transport and infrastructure investment.

Principles 1 to 5 are:

- Principle 1: A distinctive Melbourne
- Principle 2: A globally connected and competitive city
- Principle 3: Social and economic participation
- Principle 4: Strong communities
- Principle 5: Environmental resilience.

Principle 1: A distinctive Melbourne

Key issues and possible opportunities

Urban structure and place

Revitalisation and renewal

Valuing good design and innovation

Roads as features of the public realm

Tourism innovations

A creative and active population

Planning for parks and waterways

Embracing Port Phillip

Principle 2: A globally connected and competitive city

Key issues and possible opportunities

Growing a knowledge economy

Changing patterns of employment and travel

A metropolitan framework based on jobs

Industrial and freight areas

A need to increase Port capacity

Competitive airports

Embracing innovation in the private sector

Principle 3: Social and economic participation

Key issues and possible opportunities

The prospect of 'two Melbournes'

Growth on the fringe

Building connections

Our changing demography

Flexible employment opportunities and risks

Getting to work

Access to education

Principle 4: Strong communities

Key issues and possible opportunities

Fostering strong communities

Diverse communities

Finding appropriate housing

Affordable housing

Affordable living

Social housing

Communities of healthy people

The TCPA believes that urban spatial forms and the connective transportation functions need to be accountable for their direct or induced health impacts, good or bad, upon residents and other occupants of local urban precincts.

Diseases Affected by Land Use and Transport Time-Space Relationships

Type 2 diabetes mellitus (TDM2) rate variations in the general metropolitan population are in part a function personal physical activity.

The feeling of improvement in well-being is associated with dopamine increases which can be generated by time spent walking.

Opportunities to Apply Time-space Modelling in Health and Well-being Evaluation

The MPS provides the opportunity to integrate land use and transport planning to benefit the health and well-being of the metropolitan population. Firstly for most of the population sedentary time occupies a much larger portion of the day than time spent in physical activity. There is more and more evidence to show that sedentary time is a major contributor to the ever increasing burden of disease in the Melbourne metropolitan community from diabetes mellitus. Time spent sitting in a car contributes negatively to the health of the community. Therefore, urban form facilitating physical activity in the form of active transport is supported.

Secondly pollution from transport operations, whether it is atmospheric, noise and/or visual have been shown to have a negative physiological and mental health impact on people in vehicles, on streets and in their homes. Logically the longer the time of exposure to pollution, the greater is the risk to well-being. There is research to show that there are no safe pollution levels, just that the probability of a negative health outcome is less with lower levels of, or shorter periods of exposure to for example carcinogenic compounds and particulates of less than 5 microns.

Principle 5: Environmental resilience

Key issues and possible opportunities

The urban heat island effect

Energy efficient urban design

Lower impact transport

The TCPA observes that lower impact transport, mainly walking and cycling but also including such modes as skateboarding, leads to a healthier population. These modes need to be encouraged by the provision of safe and enjoyable environments. This objective complements the 20-minute city idea.

Local electricity generation

Capturing, recycling and reusing water

Conserving areas we value

Creating a green edge to the city

Food production

Waste and resource use

The TCPA contributes the following discussion:

Water resources:

There is need in the MPS to give long term consideration of undesirable changes to natural waterways and aquifers. For example, how are the conditions of the natural waterways and aquifers in the wider Melbourne metropolitan area? With continuance of current use of these water bodies and with increasing urban growth, what are the expected trends in their quality and quantities of water? We refer to current hydrological maps of Melbourne's aquifers at: http://www.water.vic.gov.au/_data/assets/pdf_file/0020/53462/Melbourne_Groundwater_Map_HighRes.pdf.

With a trend towards restrictions on use of reticulated storage water for garden watering and washing of exterior surfaces, more households and businesses are installing artesian bores with pumps. Thus there is the prospect of steady reduction in natural aquifers, due to human modifications to the natural hydrology, both from pumping out and from reduction in natural vertical replenishment by rainfall reaching the ground and soaking deep down. This reduction in vertical replenishment is more likely in urban areas where a significant portion of the land

surface is paved or roofed over, and the rainwater runoffs are channelled directly into horizontal storm water conduits emptying into metropolitan streams or artificial drains thence to the sea. Ground paving poses significant problems in highly built-over areas as these surfaces prevent rainwater from penetrating to the roots of trees and shrubs, especially along paved streets. This hydrological deficit also increases the trend towards sub-soil shrinkage with subsequent damage to underground built structures such as building foundations and pipelines.

Idea: Thought should be given to small-scale infrastructure that allows rain water falling on roofs and pavements to drain via temporary holding pits and seepage drains into the subsoil to re-hydrate the soil strata and thus nourish plants.

Idea: Provide regulatory and/or else financial offset incentives to subdivision developers to install rainwater runoff collection drainage pipe networks which empty into local storage ponds which can be drawn upon via “third water” reticulation conduit networks to irrigate private gardens, parks and agricultural lands. The reticulation and storage pond at the “Waterways” residential estate near Braeside (south east Melbourne) is a good example of capture of stormwater runoff. In this lexicon, “third water networks” (reticulation from lakes, streams and aquifers back to sites of human use other than as potable water) are distinguishable from “primary” water networks (i.e. potable water supplied from rainwater reservoirs), and “secondary” water (either storm water or sewerage networks).

Nepean aquifer:

Another potential problem could arise in the so-called “Nepean” aquifer shown in the Melbourne Groundwater Map just above here. The Nepean aquifer¹ is further described at <http://www.anra.gov.au/topics/water/overview/vic/gmu-nepean.html>

The Nepean aquifer covers nearly all of the Mornington Peninsula west and south of the Arthur’s Seat upland, and holds low salinity water suitable for drinking and/or agriculture. In some populated areas, it is becoming polluted by deep-draining septic sewage and sullage discharges from premises, especially those premises that are not equipped with aeration tanks and “ReIn” near-surface soil discharge drains. The Mornington Peninsula Shire rubbish land-fill tip at Truemans Road, Rye is another major likely source of groundwater pollution.

Increasingly, and especially during the decade-long drought that ended in 2010, householders in the peninsula are installing pumped aquifer bores to water their gardens. There is the question of the “hydrological sustainability” of parts of the Nepean aquifer, especially in the Nepean council ward (the narrow peninsula between Rye and Point Nepean), and also along the low-lying Port Phillip coast between Rye and Dromana, where the aquifer surface is close to sea level. With increased pumping-out, could the top of this aquifer drop significantly below sea level, and thence is there the risk of sea water draining horizontally into the depleted surface volume of the aquifer, with serious environmental consequences, such as saline poisoning of trees? The risk of vertical depletion could increase if South East Water extends the reticulated sewerage network to drain more or most properties, thus diverting an “artificial” replenishment of water, albeit contaminated, from the aquifer to the sewers. Counteracting this prospective loss is the increasing areal “footprint” of roof areas of new buildings which divert rainfall water

¹ Australian Government, Australian Natural Resources Atlas - Groundwater Management Unit: Nepean, Canberra, 2002, <http://www.anra.gov.au/topics/water/overview/vic/gmu-nepean.html>

from surface evaporation (e.g. tree foliage) and shallow soil penetration and retention to vertical transport via deep-drainage pits to the aquifer.

Idea: Thought should be given to encouraging the installation of rainwater holding tanks for garden watering and the installation of “deep-seepage” pits at the ends of roof rain water drains, so that the local aquifers are replenished. Deep drainage pits are already common practice in the Nepean ward.

Longer term Idea: The Carrum SEPP outfall pipeline to Boags Rocks west of Cape Schanck is a potential source of water for agriculture in Gippsland and the Mornington Peninsula, and a possible source of replenishment of the Nepean (Bridgewater formation), Moorabbin, Frankston and Koo Wee Rup aquifers. This effluent is somewhat high in its free ammonia content and has significant nutrient levels (CSIRO EIS, 1999, p.52)². Revisit the CSIRO study report of 1999 for Melbourne Water to re-assess the potential benefit into how much of the outfall flow can be pumped out from the outfall pipeline, and what tertiary treatments are required to reduce ammonia and nutrients to suitable levels, then transferred to these aquifers via to-be-constructed large- and small-scale canal and gravity-flow pipeline infrastructure into seepage pits, swales and drains and/or via direct-injection wells³.

² CSIRO, Environmental Impact Assessment and Review of Effluent Disposal Options for Eastern Treatment Plant [Carrum SEPP], Final Report, Melbourne, 1999. Found at http://www.melbournewater.com.au/content/library/sewerage/eastern_treatment_plant/planning_for_the_future/csiro_etp_ems_final_report_june_1999.pdf

³ Ibid.

4. What needs to change

Principle 6: A polycentric city linked to regional cities

The TCPA contributes the following discussion to polycentric metropolitan structure:

Any large city is necessarily poly-centric. But how much of the activity that typically takes place in the city centre can be distributed to sub-centres? How many sub-centres should compete with the city centre for business? How many of the city's cultural and sporting venues can be replicated in the suburbs?

While many of Victoria's regional cities - Geelong, Ballarat, Bendigo, Castlemaine and others - have significant cultural facilities such as art galleries, museums and botanic gardens, Melbourne's suburbs are generally lacking such facilities; Williamstown and St Kilda exceptionally have botanic gardens, and some suburbs have small theatres or art galleries. But these venues do not compete with major venues in central Melbourne.

How many outer suburban centres could support the equivalent of a regional art gallery or concert hall, let alone compete with the National Gallery of Victoria or Hamer Hall? The experience of Waverley Park football stadium suggests that suburban locations for major sports venues are not viable, particularly when they are not accessible by high capacity public transport.

A small number of outer suburban locations - edge cities - might be developed sufficiently to act as counter-attractions to the central city. We suggest that all major sub-centres should be located on suburban train lines, with the largest centres located at junctions in the rail network.

Some areas of inner Melbourne - particularly in the cities of Yarra, Stonnington, Port Phillip and Maribyrnong - now function as extensions of central Melbourne for shopping, cafes and restaurants, craft markets, galleries, theatres, and apartment living. We propose that those inner city areas that are located at the confluence of train lines be designated as sectoral centres. A sectoral centre serves the suburbs lying along the radial transport corridors that converge at the sectoral centre.

We propose that corridors of high density housing and offices be built along major highways linking sectoral centres to edge cities. For example, between St Kilda Junction and Dandenong and Frankston along Princes Highway and Brighton Road-Nepean Highway respectively, with frequent bus services running on dedicated bus lanes beyond the ends of the tram routes.

Summary of Proposals:

1. That South Yarra (with Prahran), Footscray, Richmond and North Melbourne be designated as *sectoral centres*;

2. That Werribee, Broadmeadows, Greensborough, Ringwood, Dandenong and Frankston be designated as edge cities.
3. High density corridors linking *sectoral centres* to edge cities.
4. Major Activity Centres and the “next level” of smaller suburban centres that have been identified by state planning departments since the 1980s and which lie on current and future grade-separated passenger railways should be the priority focii for rezoning of existing land uses and the conversion of closely adjacent brownfields and “yellowfields” lands for denser re-development.

The TCPA’s terminology for land-usage is explained as follows. The land being restructured can be “greenfields” (essentially virgin or agricultural land), “brownfields” (land already intensively built-over for intended purposes, but whose uses have now 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.

Prominent examples of urban brownfield developments in Melbourne are the former Victoria Docklands, Dandenong livestock saleyards and the Broadmeadows army camp. Wapping, in London, is world famous as Canary Wharf.

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. Along the proposed Monash Railway, there are considerable areas of yellowfields residential and commercial land stocks, particularly surrounding Oakleigh’s central business district, and in Huntingdale and Clayton.

Key issues raised in research and consultation

The efficiency of a polycentric city

Urban form policy based on job location

Central City

Nationally significant employment and innovation clusters

Building up a small number of high level service centres

Connections to regional cities

Ideas and aspirations for change

The Committee has identified seven initial ideas for strategic priorities to manage the overall urban form of Melbourne and its connections to regional cities.

Idea 1: Growing the Central City as the anchor of a world city

Idea 2: Building national employment and innovation clusters

Idea 3: Unlocking capacity in established suburbs

Idea 4: Providing a transport system for Melbourne's future

The TCPA believes that the MPS needs to be cognisant of and built around long term future energy supply and carbon emission restriction trends.

The MPS needs to extend transport corridor land reservations as true network (radial and orbital/cross-town) road, rail, bus-ways, and non-motorised transport (walking and cycling) as well as spatial (on-ground and underground) corridors for energy, communications, water and waste transport, taking at least a 50-year time horizon.

Examples of major capacity road transport infrastructure proposals (not a complete list):

- (a) EW road tunnel & motorway. Must be part of a general road pricing strategy and physical and pricing-deterrence restrictions put on car commuters' access to inner city and environs.
- (b) Need for greater north-south road freight traffic separation, e.g. how to link M1 and Nepean Highway, as Queens Avenue through Albert Park is at capacity, and the Esplanade is inappropriate. This could be part of a major redevelopment of St Kilda Junction for high rise residential and commercial floor space – a second Southbank?
- (c) Also link Nepean Highway to Mornington Motorway with Dingley Bypass to South Road and to widen White Street Mordialloc to join Braeside Boundary Road to Nepean Hwy.

Major capacity rail freight transport infrastructure, including:

- (a) Rail freight links to Webb Dock and to Port of Hastings.
- (b) Freight traffic separation through western suburbs. Westgate motorway off-ramps project
- (c) Standard gauge freight railway linking Gippsland and Hastings to Dynon yards and the Australian standard gauge network

Major capacity PT infrastructure - some important examples:

- (a) Regional Rail and Metro tunnel line – essential infrastructure. Longer term option to extend another loop via St Kilda Junction then back towards Caulfield rail line.
- (b) Rail or light rail links cross town, e.g. Camberwell to Rowville by converting Alamein line to light rail and extending it
- (c) Bus-way grade separation to expedite trunk/PPTN bus route services, across town as well as in radial directions.
- (d) Set aside reservations for major rail links e.g. to Melbourne Airport, Avalon Airport.

PT infrastructures (b) and (c) are necessary to achieve the MAC's Discussion Paper Principles 6 and 7.

Idea 5: Strengthening the green edge to Melbourne

Idea 6: Building a state of cities

Idea 7: Extending Melbourne's boulevards – a civic legacy

The TCPA believes that whilst this idea seems attractive, there are limited opportunities to extend the existing boulevards. Royal Parade and Victoria Parade cannot be extended without wholesale demolition of Sydney Road and Victoria Street.

However, there is an opportunity to improve St Kilda Road south of St Kilda Junction, Brighton Road, Nepean Highway and Dandenong Road to boulevard standards.

There is also an opportunity to apply a boulevard treatment to Kings Way.

[Edited down to here]

Other Ideas:

Creating civic spaces

The TCPA observes that there are few significant civic spaces in Melbourne. Where space permits, new civic spaces could be created out of street intersections. For example, St Kilda Junction could be remodeled as a major pedestrian space and gateway to central Melbourne, by diverting through traffic underground, leaving the ground level for trams, bicycles and pedestrians.

Principle 7: Living locally – A ‘20 minute’ city

Accessible, safe and attractive local areas where people can meet most of their needs will help make Melbourne a healthier, more inclusive city. Having a range of services close to home and work frees people up to do more of the things they enjoy.

By ‘locally’ the Committee means travel distances of 20 minutes as rule of thumb. Living locally can be achieved by adding services (and the population to support those services) to existing areas and improving transport connections (especially walking, cycling and local buses) to existing services and jobs.

It is at the local level that the Strategy can deliver choice and opportunity to people. The first five principles identified a number of implications for how local areas could be managed:

- provide places and shared public environments to foster social contact including transforming roads that no longer carry as much traffic into more attractive urban places
- support local services, local clubs, organisations and networks
- provide settings for artistic, cultural and sporting endeavours
- address affordable living
- promote innovation in design and construction
- support a variety of housing needs at a local level
- establish Melbourne and Victoria as leaders in building environmental resilience into urban areas
- promote the retrofitting and re-engineering of Melbourne’s existing suburbs – reducing energy use, water use and waste production.

As our population ages, and household structures change, our social, educational, recreational and health needs also change. If services are to be delivered to areas where they are most needed in the future – rather than where they were most needed in the past – the infrastructure required to deliver these services must also change.

The TCPA comments:

Local suburban centres spaced for 20-minute walking access implies a maximum spacing of 4 km between centres.

Housing for the elderly should be located close (< 1km) to retail, services and public transport

Key issues raised in research and consultation

Can living locally be achieved?

The TCPA observes and recommends:

Residential mobility of population:

By necessity, people are changing job locations 2 to 3 times per decade, either within their existing employers, or by changing employers. Oftentimes, such employment changes involve significant distance-changes in their places of employment. Ideally, the home location could change too, although there's the inertia to change due to:

- employment location of spouse
- locations of children's schools
- state taxes that relate to buying or selling homes.

TCPA suggests that the tax restraints against households relocating to be nearer to jobs could be dealt with via reform of state taxes. The following issues are relevant to any strategic review of this issue and its solution.

- What are the job and employment change profiles of Melburnians, in terms of the average period between changes of physical place of employment?
- Abolish land purchase stamp duty and replace it with an annual property tax on all properties the \$ rate of which should be proportional to a property's value (combine it with existing Land Tax). This should reduce barriers to households relocating to be closer to household members' new employment.
- Holding tax on land Is it possible to establish and enforce a "holding tax" upon non-urban land and vacant land (i.e. farm-zoned land not being intensively farmed, and urban zoned land lying "fallow" for extended periods, say, 2-3 years) to discourage land-banking investors/speculators?

Different people have different needs

Some areas have obvious potential

The TCPA recommends:

Zoning controls to foster good integration of residential, social and occupational land-sites:

Planning zoning rules should be changed to move towards stricter zoning that differentiates between dwellings/ha (plot density) in precincts close to (by walking access) high quality-of-service (QOS) public transport (i.e. grade-separated rail, LRT or busways) and precincts remote from these. This should address and restrict the rate of infill housing building in suburban areas not close to high QOS PT, and also better co-locate housing with commercial land-uses as should occur in the 20-minute city concept.

High-density transit corridor zoning strategies, such as those advocated by Melbourne planner Rob Adams and by TCPA would be consistent with this.

Housing supply and local areas

The TCPA observes that the cost of the dwelling is not the only consideration. When comparing the cost of developing new suburbs with the cost of infill in existing suburbs. For the resident there is the cost of transport; for the government there is the cost of providing public transport, schools, hospitals and other public services.

Infrastructure in established areas

Ideas and aspirations for change

The Committee has identified three initial ideas for strategic priorities that might help make Melbourne a '20 minute city'.

Idea 8: Delivering jobs and services to outer area residents

The TCPA notes and recommends the Netherlands model for urban development - the "ABC" model - locates people-intensive land uses (such as offices, shops and schools) at places that are readily accessible by public transport, whilst land uses that employ few people but generate high volumes of freight (such as warehousing) are located close to high capacity roads. TCPA supports the application of this model to Melbourne. Offices that are located close to freeways, or office parks that are located on major roads, far from public transport, are non-ideal.

Idea 9: Providing diverse housing in the right locations at a reasonable price

The TCPA advocates that housing for the elderly should be located close to retail, services and public transport.

Idea 10: Improving the environmental performance of suburbs

Other Ideas - from TCPA

The TCPA contributes the following to the concept of the 20-minute City:

The Time-Space Geographic Chess Board

Defining criteria for 20-minute cities need to allow for very different urban built geographies, proximity of activity sites and transport services. TCPA suggests that KPIs need to be carefully designed to achieve realistic and consistent measures of performance in achieving this principle, and of comparing municipalities.

To illustrate, the first set of KPIs are proposed for the 31 Local Government Areas (LGAs) comprising the Melbourne Statistical District (MSD). However, several LGAs such as Moreland enclose significantly different urban form or urban morphology qualities and the smaller ABS Statistical Local Areas (SLAs) comprising an LGA are also separated out and used in setting KPIs for such LGAs. The LGA of Melbourne is very unlike the other 30 LGAs and becomes a special category of KPIs which excludes its KPI targets from the comparative tables.

The proposed LGA KPIs for the MSD are grouped into quintiles of six LGAs. Clearly the geographic time-space models for the LGAs of Yarra and Yarra Ranges are very different. However urban time-space models for Melton may have more common denominators with Yarra Ranges and Nillumbik.

How people spend their time in less than healthy environments is often a function of travel behaviour and mode choice, which in turn is a function of where they live, work, shop and play

The municipal areas and 2011 ABS populations of the MSD LGAs are listed in alphabetical order in the table below.

Note that VISTA, VATS and ABS all show significant variation in the amount of physical activity generated across the MSD. Active transport (walking and cycling) varies as follows as percentage of the 100% of active transport across the MSD (excluding the MCC).

The percentages were compiled using VISTA 2007, VATS 1994-2002, and ABS JTW. The percentages are averaged and weighted from data sets covering seven days a week over 365 days per year.

MSD LGAs N=30	% of trips in LGA by Active Transport modes (excludes Melb CC)
Boroondara (C)	7.4%
Yarra (C)	6.9%
Whitehorse (C)	5.7%
Greater Dandenong (C)	5.5%
Moreland (C)	5.5%
Port Phillip (C)	5.3%
Stonnington (C)	5.2%
Darebin (C)	4.8%
Glen Eira (C)	4.3%
Monash (C)	4.2%
Banyule (C)	4.1%
Kingston (C)	3.5%
Moonee Valley (C)	3.4%
Maribyrnong (C)	3.3%
Maroondah (C)	2.9%
Bayside (C)	2.9%
Mornington Peninsula (S)	2.7%
Hobsons Bay (C)	2.5%
Yarra Ranges (S)	2.4%
Knox (C)	2.3%
Hume (C)	2.2%
Manningham (C)	2.1%
Frankston (C)	2.0%
Casey (C)	1.8%
Whittlesea (C)	1.8%
Brimbank (C)	1.7%
Wyndham (C)	1.5%
Nillumbik (S)	0.8%
Melton (S)	0.8%
Cardinia (S)	0.3%
Total Active Transport trips for MSD	100.0%

Clearly the layout of suburbs in the LGAs top two quintiles support healthy transport activity whereas the urban form and lifestyle in the lower two quintiles do not.

5. Making it happen

The Metropolitan Planning Strategy must move away from regulation as the primary means of achieving planning outcomes. Instead, we need to invest more heavily in vital infrastructure to support city growth and social cohesion, and foster stronger partnerships between government, the private sector and the community. It is important that the community endorses the Strategy and expects successive state governments and councils to work toward its delivery.

Private development can often recognise opportunities government has not considered and systems should be established to better respond to these initiatives. The planning system needs to be flexible and responsive to changing ideas, business practices, and living preferences.

The final two principles outline how the Strategy could be implemented:

- Principle 8: Infrastructure investment that supports city growth
- Principle 9: Leadership and partnership.

Principle 8: Infrastructure investment that supports city growth

A single integrated land use, transport and social infrastructure strategy means ensuring that infrastructure investment supports sustainable land use patterns and drives productivity.

[Headings in original document]: -

East West Link

Melbourne Metro

Port of Hastings

Dandenong Rail Capacity Program

Western Interstate Freight Terminal

M80 Upgrade

Key issues raised in research and consultation

Historic under-investment

Shaping the city

Working infrastructure harder

Looking to the fringe

Who should pay for infrastructure?

TCPA recommends a complete overhaul of the essentially disparate methods of funding the various sectors of transportation towards pricing and funding mechanisms that are mutually integrated and harmonious. This should result in allocative efficiency of resources and better balance and equity of outcomes for all - or as many members of society as possible. Reform transport pricing and taxation. The TCPA cites and recommends the findings and recommendations put forward by the Bus Industry Confederation of Australia in its 2012 report "Moving People", chapter 4: *Sustainable Pricing and Funding*⁴. The TCPA would go even further than the recommendations for road congestion pricing and would recommend for the metropolitan areas a general metro-wide wide area RF-electronic road pricing ("WARP" or "GWARP") with price differentiation according to the particular route, time of day, day of week, route congestion levels, and travellers' access to alternative PT or non-motorised modes of transport.

TCPA suggests that the MAC review the research on the validity of congestion pricing by Zahn Guo et al (New York University), *Congestion pricing works best when partnered with land-use*

⁴ Bus Industry Confederation of Australia, *Moving People*, chapter 4: Sustainable Pricing and Funding. Canberra, 2012

planning. ScienceDaily. 23 September, 2011#, at <http://www.sciencedaily.com/releases/2011/09/110923131327.htm> ⁵

There is the need and opportunity to remodel pricing and funding of all transport modes for freight and people movements, and link these mechanisms to improvement/betterment levies on existing and future property.

The TCPA strongly advocates a thorough redesign of the current two-zone flat fare structure for Melbourne metropolitan public transport under Myki, and introduce say 5 transitional zones to reduce the psychological “cliff” of the abrupt doubling of fares across the single zone boundary as present.

Finding the money

The TCPA again endorses the findings and recommendations put forward by the Bus Industry Confederation of Australia in its 2012 report “Moving People”, chapter 4: *Sustainable Pricing and Funding* ⁶

Ideas and aspirations for change

Infrastructure investment is critical to effective delivery of the Strategy. The Committee has identified three initial ideas to guide delivery.

Idea 11: Using investment to transform places

The TCPA proposes the following:

Idea: It would very valuable if strategic land-use planners would refresh their understanding of the words “huddle” and “innovation” in comprehending the dynamics of commercial marketplace competitive decision-making, and in decisions that people make when they pursue an activity.

Strategic idea: The government should identify and measure the hidden subsidies to land developers that arise because of government funding of infrastructure construction and/or of government recurrent subsidies paid to operating such infrastructure, e.g. roads and public transport. The purposes of this should be to (a) set and charge betterment levies upon site occupiers and developers which recognise this taxpayer contribution, and (b) to formulate, then set land-use zoning rules and some degrees of state tax rebating to encourage development where infrastructure has (i) excess capacity for increased utilisation, and (ii) use of such infrastructure provides a “net economic benefit” to the government (thus taxpayers) in not investing in additional infrastructure than “necessary” to support new geographic land subdivisions. In doing this, both the state and local governments would recognize the true establishing and recurrent costs of subdivisions in various parts of the metro area, e.g. and

⁵ Zahn Guo et al, *Congestion pricing works best when partnered with land-use planning*. Science Daily. 23 September, 2011, at <http://www.sciencedaily.com/releases/2011/09/110923131327.htm>

⁶ Bus Industry Confederation of Australia, *Moving People*, chapter 4: Sustainable Pricing and Funding. Canberra, 2012

especially high-rise redevelopments in brownfields and inner areas, and costs of outer fringe subdivisions.

The strategic intent of this idea is to enable the state and local governments to “lead” the pattern of land-use (re)development towards strategically-preferred locations (but not the project land-banks owned by “political mates”), rather than to passively “follow” the process of land-use (re)development, whilst not destroying the creative initiative of private investments.

Idea 12: Moving to a place-based focus for programs

Idea 13: Identifying a long-term framework for metropolitan infrastructure

The TCPA considers that the MPS needs to be cognisant of and built around long term future energy supply and carbon emission restriction trends.

The MPS needs to extend transport corridor land reservations as true network (radial and orbital/cross-town) road, rail, bus-ways, and non-motorised transport (walking and cycling) as well as spatial (on-ground and underground) corridors for energy, communications, water and waste transport, taking at least a 50-year time horizon.

Principle 9: Leadership and partnership

Good governance, strong leadership and collaborative partnerships are essential to the success or failure of a metropolitan strategy. Partnerships between Commonwealth and State Governments, State Government and local councils, public and private sectors, councils and their communities, are fundamental ingredients to achieve a positive future for Melbourne. Through mutual interest and respect we can share the benefits and responsibilities of implementation.

Metropolitan planning: a critical assessment

Setting a city-shaping agenda

Partnerships with the private sector

A new governance structure?

Revised planning policy

Ideas and aspirations for change

Effective implementation of the Strategy is fundamental. Where past plans have failed it has principally been through a lack of effective implementation.

Idea 14: Developing partnerships and agreements

Idea 15: Developing good governance structures and processes to deliver the Strategy

Issue: improved governance and public scrutiny

The TCPA believes that with respect to governance of actions by legally-authorized entities whose actions are relevant to planning of land-use and related functions controlled by the Victorian state and local governments, improved efficiency, efficacy, consistency and public accountability are required within the relevant acts of parliament. Harmonisation of powers and of rules that guide decision-making for consistent, efficient, economic, fair and sustainable outcomes is required.

As an example, the TCPA revisits a part of its submission to the Victorian government's public inquiry of 2007 for revising transport legislation, with reference to subsequent law changes. Refer to the following:-

Ideas for reforming and strengthening governance of required performance/outcomes of relevant statutory authorities as required by transport legislation in Victoria.

1. The Transport Integration Act 2010 (“TIA”) should fully commit governance of transport to public scrutiny (i.e. not just through the exercise of the Transport Minister's prerogative) and public in major decisions, and to commercially competitive challenge.
2. After the TIA and recent restructuring within PTV, there is now some degree of separation between administrative and executive functions of strategic planning from those executive and administrative functions of contracting, licensing and supervision of transport service deliverers such as bus, train and tram operators. The TCPA believes these reforms should be strengthened with specific legislative amendments to enhance the separation of independence and integrity of transport services planning decisions.
3. The TIA should provide clear opportunities for formal scrutiny and legal appeal by any member of the public or any organisation against specific decisions about transport planning and service licensing. VCAT could be the best jurisdiction of such objections, however legal process should continue to be allowed in other courts. The relevant clauses in the TIA (along with amended/inserted clauses in VCAT Act) would also oblige the relevant transport authority to submit evidence upon which its decision was based to the VCAT adjudication, for public cross-examination. Another requirement in legislative reforms would be the requirement that all consultations with bodies and persons outside of the primary governing organisation (e.g. DoT and PTV for transport), be notarised in official department records, and accessible under FOI and public audit laws. This would encompass departmental communications with external lobbyists.

Issue: How can the re-design of public agencies and corporations improve metropolitan governance?

Answer, and idea: Melbourne should draw upon the experience of very good statutory governance of city planning in jurisdictions that share most of the values and laws of Victoria. The TCPA refers to greater metropolitan Vancouver in Canada as providing lessons and leadership to Victorian politicians and community in reforming the agencies of public governance of public planning and administration of land use, transport and other “infrastructural” services.

Canada, and British Columbia have systems of sovereign governance almost identical to Australia and Victoria. That is, federal and state dominion constitutional monarchies governing through Westminster systems of parliamentary executive governments, with Crown courts of law separated from the executive government, with municipal governments underlying the state or dominion governments.

Some of the statutory arrangements forming the basis of metropolitan Vancouver’s successful planning and services operation include:

- The Vancouver Charter⁷
- Metro Vancouver⁸ is the name of a political body and corporate entity designated by provincial legislation as one of the regional districts in British Columbia, Canada. The

⁷ The Vancouver Charter Act, and explanations, at <http://vancouver.ca/your-government/the-vancouver-charter.aspx>

⁸ Metro Vancouver website, at <http://www.metrovancouver.org/Pages/default.aspx>

organization was formerly known as the Greater Vancouver Regional District (GVRD), and that name is still the official name and remains in common colloquial use. Metro Vancouver is under the direction of 24 local authorities (including 22 incorporated municipalities); it delivers regional services, sets policy for a number of functional sectors (including land use, transportation, water resources, environment), regulates land-use planning and acts as a political forum.

- Translink⁹ is responsible for the planning, financing and managing of all public transit in addition to major regional roads and bridges, regional transit, and cycleways. Translink is guided by the South Coast British Columbia Transportation Authority Act (the Act; formerly the Greater Vancouver Transportation Authority Act until its amendment in 2007). Under this Act, TransLink has a multi-tiered governance structure that includes the Board of Directors, ***the Mayors' Council (of the 22 regional municipalities)*** on Regional Transportation and the Regional Transportation Commissioner. A Screening Panel, established annually, is responsible for nominating candidates for appointment to the Board. The Board has the responsibility and the mandate to make decisions in the interest of TransLink within the limits established by the Act.

Idea 16: Setting targets, measuring progress and publishing indicators

For too long many aspects of Melbourne's urban system have gone unmeasured or unreported. Setting targets and aspirations will be central to the Metropolitan Planning Strategy.

TCPA advocates that a clearer path of steps be written into the MPS that clearly and logically evolve from principles and philosophy to goals then to measurable objectives. Thus, the TCPA advocates the evolution of the high-level goals of the main principles (1 to 5) into more focused goals then into measurable (quantifiable) objectives. Idea 16 of MAC's (Ministerial Advisory Committee) Principle 9 is strongly supported in principle.

Also, population forecasts are required, per decade, to provide physical planning goals and to minimise "incremental" subdivision planning approaches. According to the Discussion Paper, by 2050, Melbourne is expected to have 5.6 and 6.4 million people.

The Metropolitan Planning Strategy (MPS) for Melbourne as currently written requires many more Key Performance Indicators (KPI) to be meaningful.

The Town and Country Planning Association movement in Australia and the UK have a proud history of advocating urban design facilitating healthy living and wellbeing.

The setting of KPIs needs to be evidence based. The evidence for the TCPA KPIs is presented in the fact sheets forming the Appendices to this submission. The definitions applied to the TCPA Fact Sheet means that the source of content is acknowledged and the author's evidence is the fact presented. In no way does the TCPA fact sheet imply that it represents a universal truth or scientific law.

This section of the TCPA commentary focuses on the potential active transport capacity of

⁹ Translink website, at <http://www.translink.ca/>

the MPS in 2011 and the health and wellbeing KPIs to be set in the MPS for the census years up to 2051. The MPS structural and operational model used implies increasing personal active transport activity will benefit the health and wellbeing of the community.