



***Town and Country Planning Association  
Incorporated***

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<http://www.tcpa.org.au/>

24 October 2021

The Secretary  
Department of Environment Land, Water and Planning  
8 Nicholson Street  
EAST MELBOURNE VIC 3002

Dear Sir

**Re: *Town & Country Planning Association Inc. submission to the  
Melbourne's Future Planning Framework: Draft Land Use Framework  
Plans***

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The Town and Country Planning Association Inc. (TCPA) is pleased to make this submission *Melbourne's Future Planning Framework: Draft Land Use Framework Plans* (2021).

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 organisation, established in Victoria in 1914, and is independent of any party political organisation.

In preparing this submission, the TCPA has considered proposals and provisions in:

- *Plan Melbourne 2017-2050* (2017)
- *Plan Melbourne 2017 – 2050: Addendum 2019* (
- *Draft Land Use Framework Plans* prepared for the Eastern Metro, Inner Metro, Inner South Eastern Metro, Southern Metro, Northern Metro and Western Metro regions.

Please find attached the TCPA's response to the *Draft Land Use Framework Plans* (Draft LUFPs) covering the six metropolitan regions. We note that each appears to be a policy-neutral interpretation of existing frameworks and strategies.

Rather than responding to the detail of contained in each of the Draft LUFPs, we have addressed issues that are common either generally to or by sections of the LUFPs and suggested recommended actions resolve these issues.

Once again, the TCPA is grateful for the opportunity to respond in this process and looks forward to our on-going participation.

Yours faithfully

Peter Hill,  
Honorary Secretary, TCPA  
Email: [secretary@tcpa.org.au](mailto:secretary@tcpa.org.au)

Enc. *ATTACHMENT 1: Submission to Melbourne's Future Planning Framework: Draft Land Use Framework Plans* (14 pages)



ISSUE	TCPA COMMENTS	RECOMMENDATION
<b>General</b>		
<b>Engage Victoria Website functionality</b>	Documents were extraordinarily large – even individual chapters. There should have been no reason for their resolution not to have been optimised for web access. While this can affect the sharpness of images, we note that full resolution files were separately available for maps if readers wished to access those.	
<b>Background material needs revisiting for a post-pandemic Melbourne</b>	<p>The vast majority of references, research, policies, strategies and initiatives predate 2019 and do not address:</p> <ul style="list-style-type: none"> <li>• The economic and social changes occasioned by living locally, working and shopping from home, even changes in the way residences and office spaces are designed</li> <li>• Changes to societal behaviours mentioned in preceding dot point as facilitated by adopted uses of new digital technologies</li> <li>• Emerging technologies in the transport sector – rideshare services, autonomous and non-fossil fuel vehicles sources (electric, biofuel, hydrogen).</li> </ul>	Spend the next 4- 5 years updating references, research (including extensive recalibration and revision of transport and land-use prediction models), policies, strategies and initiatives to address a post-pandemic “normal”.
<b>Mapping styles between documents</b>	Mapping is inconsistent in style and imagery between the full plans and their summary documents	



ISSUE	TCPA COMMENTS	RECOMMENDATION
<b>LAND USE FRAMEWORK PLANS – By sections</b>		
<b><u>Introduction and Regional Snapshot</u></b>		
<p><b>Plan Melbourne 2017-2050:</b>  <b>GAP:</b>  <b>Outcome 7 has been ignored in the Land Use Framework Plans</b>  <i>Regional Victoria is productive, sustainable, and supports jobs and economic growth</i></p>	<p>Each Land Use Framework Plan (LUF) contains the following statement</p> <ul style="list-style-type: none"> <li><i>The LUFs support the implementation of Plan Melbourne – guiding the implementation of Plan Melbourne’s nine principles, <b>seven outcomes</b>, 32 directions and 90 policies at a regional and local level.</i></li> </ul> <p>Not only has Outcome 7 not been addressed, but also it was dismissed as “not relevant” in the consultation/information sessions. Questions about the 10 key regional cities or Regional Growth Plans (including, their <u>urgent need for updating</u>) were not answered.</p> <p>Presumably the growth anticipated by Outcome 7 has benefits and synergies with the whole of the state not just regional Victoria. Therefore the roles of the 10 key regional cities and their synergies with National Employment and Innovation Clusters (NEICs) as well as the Melbourne CBD must become part of the discussion.</p>	<p>LUFs should not be finalised before they address Outcome 7</p>



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<p><b>How will the land use framework plans be used?</b></p> <p><b>GAP:</b></p> <ul style="list-style-type: none"> <li><i>Will LUFPs be incorporated into Planning Schemes?</i></li> </ul>	<p>The LUFPs will set regional-level planning policy to be implemented into planning schemes, but will they be incorporated into a planning scheme?</p> <p>Implementation Plans will be reviewed every five years, it is unclear as to what status a LUFP will have if Plan Melbourne is reviewed or replaced before 2050.</p>	<p>Revise the LUFPs to provide greater clarity on this matter.</p>
<p><b>State-led planning [in the region]</b> <b>Places for State-led planning</b></p> <p><b>GAP:</b></p> <ul style="list-style-type: none"> <li><i>Significant State responsibilities for port and airport planning omitted</i></li> </ul>	<p>Significant places where the State has planning responsibilities have not been included. E.g. Port of Melbourne, State responses to proposals on Commonwealth leased airports (Melbourne, Essendon, Moorabbin and RAAF Williams – Point Cook Airbase)</p>	<p>Revise relevant LUFPs to address these matters</p>
<p><b>The broader context</b></p> <p><b>GENERAL:</b></p> <ul style="list-style-type: none"> <li><i>What is meant by “20-minute neighbourhoods”?</i></li> </ul>	<p>There seems to be significant confusion on the definition of 20-minute neighbourhood – not only in public minds, but also within the LUFPs themselves.</p> <ul style="list-style-type: none"> <li>Is it a “20-minute walk from home” or a “20-minute <u>return</u> walk from home”?</li> </ul> <p>Different interpretations were given by departmental officers at different consultation/information sessions.</p> <p>The concept appears to be applied housing density around transport nodes and commercial precincts (e.g. NEICs, Major activity centres (MACs), Neighbourhood activity centres (NACs) and Suburban Rail Loop (SRL) station precincts. This has left many suburbs wondering just what is intended. In many established middle ring suburbs, the local shopping centre can be well over a 10-minute walk away.</p>	<p>Revise the LUFPs to provide greater clarity on this matter.</p> <p>Consider LUFP models and implementation strategies in the event that the Suburban Rail Loop (SRL) does not proceed, and is substituted by alternative public transportation and land-use clustering structures.</p>



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<p><b>City-shaping transport projects</b></p> <p><b>GAP:</b></p> <ul style="list-style-type: none"> <li><i>Melbourne Airport planning projects</i></li> </ul>	<p>No mention of</p> <ul style="list-style-type: none"> <li>Review of Melbourne Airport Environs Strategy Plan and airport environs issues which affect significant areas of the Northern and Western regions.</li> <li>Melbourne Airport's 3<sup>rd</sup> runway development which will occur during the timelines for the state transport projects</li> </ul>	<p>Revise the LUFPs to provide greater clarity on these matters.</p>
<p><b>Coronavirus (COVID-19) impacts</b></p> <p><b>GAP:</b></p> <ul style="list-style-type: none"> <li><i>More analysis required</i></li> </ul>	<p>Each LUIFP contains a generic statement on the pandemic addressing:</p> <ul style="list-style-type: none"> <li>Restricted movement has reduced migration to Victoria almost to zero.</li> <li>Victoria's population decline slightly in 2020-21, compared with average growth of 2 per cent for most of the previous decade.</li> <li>International migration is expected to resume within one to two years but not return to normal until the mid-2020s at the earliest.</li> <li>This interruption to growth is not expected to change the long-term future direction of Melbourne.</li> <li>The pandemic has had significant impacts, including:             <ul style="list-style-type: none"> <li>– shift to work-from-home arrangements, and</li> <li>– greater uptake of online retail services</li> <li>– and accelerated use of new digital technologies supporting these behavioural changes</li> <li>– shift to local living, activity centres and neighbourhoods to meet day-to-day needs.</li> </ul> </li> </ul>	<p>This statement is the only reference to COVID-19 impacts and issues. Much more work is needed before these framework plans can be finalised.</p> <ul style="list-style-type: none"> <li>How long will it be before the economy rebounds to a "new normal"? And, what will be the new long term "normal"</li> <li>Will working and shopping from home become part of the new normal?</li> <li>With increasing interest in shifting to regional centres, should the focus be on supporting 10 key regional cities instead of allowing peri-urban centres priority?</li> </ul>



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	<ul style="list-style-type: none"> <li>- in specific areas such as Melbourne's CBD and the Monash and Bundoora education precincts</li> <li>• Many industry sectors impacted by COVID-19 restrictions, including tourism, the arts and international education, are still recovering.</li> </ul>	
<p><b>GAP:</b></p> <ul style="list-style-type: none"> <li>• <b><i>Neither the Introduction or the Regional Snapshot contain any discussion of the region in the context of adjoining regions in both metropolitan and regional Victoria.</i></b></li> </ul>	<p>TCPA has noted that neither the Introduction nor the Regional Snapshots include any discussion or analysis of the respective region's interfaces and synergies with adjoining regions except for:</p> <ul style="list-style-type: none"> <li>• Peri-urban areas</li> <li>• transport connections</li> <li>• a single mention of a water pipeline from the Desalination Plant at Wonthaggi; and</li> <li>• occasional mentions of the Yarra River which forms the boundary between two regions.</li> </ul> <p>TCPA members have been involved in metropolitan strategic planning since the 1980s. As with any planning proposal, the first step should be to consider the subject area's relationship with surrounding areas, taking onto account regional, statewide and national contexts.</p> <p>The LUFs do not convey any sense of strengths of adjoining regions and what value they add to a LUF region and its plan. There is no sense that adjoining regions might offer economic or social benefits to the subject region.</p>	<p>Revise the LUFs to demonstrate a better understanding of region in the context of surrounding regions – both metropolitan and regional.</p>



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	<p>For example, there is no mention in any LUFP of:</p> <ul style="list-style-type: none"> <li>• The significance of the 10 key regional cities mentioned in Plan Melbourne's Outcome 7. (except for transport connections in some cases)</li> <li>• Regional Growth Plans approved for regional Victoria or their interfaces with each metropolitan region.</li> <li>• its place within broader state and national contexts, which is odd since all, but one, host an NEIC or SRL hub or three!</li> <li>• Economic significance of Gippsland and north east Victoria as food bowls?</li> <li>• Employment areas that lie beyond the LUFP region's boundaries</li> <li>• Social infrastructure – hospitals and education facilities that serve communities beyond a LUFP.</li> </ul>	
<b><u>Vision for the Region in 2050</u></b>		
	<p>The regional 2050 visions generally reflect the <i>status quo</i> for each region and a policy neutral interpretation of existing frameworks and strategies.</p>	<p>No action required</p>
<p><b>GENERAL:</b></p> <ul style="list-style-type: none"> <li>• <b><i>Generic terminology creates some confusion between regions</i></b></li> </ul>	<p>In attempting to have a consistent terminology for land use precinct across all plans, confusion is often created as the characteristics of those precincts vary considerably between regions. An example of this is "Regionally significant industrial precincts".</p>	<p>Revise relevant LUFPs to address these matters</p>



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<p><b>GENERAL:</b></p> <ul style="list-style-type: none"> <li><i>Vision statements should be inclusive of influences from other regions</i></li> </ul>	<p>Key elements from adjoining regions are not included, indicating a parochial and promoting an insular mindset for each region.</p> <p>The boundaries between regions are much more porous than the bold outlines shown on the maps. Communities interact between municipalities and regions.</p>	<p>Revise relevant LUFs to address these matters</p>
<p><u>Productivity</u></p>		
<p><b>GAP:</b></p> <ul style="list-style-type: none"> <li><i>Influences from other regions</i></li> </ul>	<p>NEICs, Major activity centres (MACs), Employment areas, Industrial precincts and Agricultural areas</p> <ul style="list-style-type: none"> <li>Include influence of the similar centres or areas in other regions</li> </ul>	<p>Revise relevant LUFs to address these matters</p>
<p><b>Freight networks and gateways</b></p> <p><b>GAP:</b></p> <ul style="list-style-type: none"> <li><i>Include strategic pipelines</i></li> </ul> <p><b>GAP:</b></p> <ul style="list-style-type: none"> <li><i>Include national and regional passenger networks and gateways.</i></li> </ul>	<p>As well as road, rail, air and sea infrastructure, liquid fuel pipelines perform a critical distribution function and will have a future for hydrogen fuels.</p> <p>As well as Southern Cross Station, their connections at NEICs will be important, particularly</p> <ul style="list-style-type: none"> <li>Sunshine and Werribee NEICs as hubs on broad and standard gauge rail corridors with connection to Adelaide and Sydney interstate and northern, western and south western Victorian regional passenger services; and</li> <li>Dandenong and Monash NEICs as hubs for passenger services to Gippsland.</li> </ul>	<p>Revise relevant LUFs to address these matters</p>



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<p><b>Port of Melbourne, Port of Hastings and potential Bay West port</b></p> <p><b>GAP:</b> <i>More detail required relating to:</i></p> <ul style="list-style-type: none"><li>• <i>port planning frameworks</i></li><li>• <i>Port mapping</i></li><li>• <i>Land use implications of port security requirements</i></li></ul>	<p>Ports of Melbourne and Hastings</p> <ul style="list-style-type: none"><li>• Ports as per Port Development Strategies and Ministerial Direction on port environs planning – noting that these will be required for a potential Bay West port.</li><li>• The full extent of the Port of Melbourne facilities was not indicated or mapped in the Inner Metro LUF</li><li>• Station Pier was shown as public open space, when in “normal” times it is a restricted area for the Spirit of Tasmania ferries, visiting cruise ships and naval vessels! Even once the Spirit of Tasmania ferries shift to the Port of Geelong, the pier will have restricted public access only.</li></ul>	<p>Revise relevant LUFs to address these matters</p>



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<p>Melbourne, Essendon, Moorabbin and potential South East airports</p> <p><b>GAP:</b> <i>More detail required relating to:</i></p> <ul style="list-style-type: none"><li>• <i>Mapping of airport runways</i></li><li>• <i>Mapping of Airport and airport environs</i></li></ul>	<p>For each airport, map:</p> <ul style="list-style-type: none"><li>• Flight corridors and runways (existing and proposed - can be up to 3km in length) as shown in approved airport master plans; and</li><li>• Environs areas – Melbourne Airport as per <i>Melbourne Airport Environs Strategy Plan (2003)</i>, Airport Environs overlays (aircraft noise) and Design and Development overlays (height controls and flight corridor protections) and other overlays to address all Guidelines in the <i>National Airports Safeguarding Framework</i> in relevant planning schemes.</li><li>• Note that all the above will be required in planning a future South East Airport as well as environmental approvals under both state and Commonwealth legislation.</li></ul>	<p>Revise relevant LUFPs to address these matters</p>



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<u>Housing choice</u>		
<p><b>GENERAL:</b></p> <ul style="list-style-type: none"> <li><i>Focus on housing density in specific precincts creates uncertainty for other areas.</i></li> </ul>	<p>The plans appear to focus on housing density around transport nodes and commercial precincts (e.g. NEICs, MACs, NACs and SRL station precincts) with radii of interest varying between 800m to 1,600m</p> <ul style="list-style-type: none"> <li>In the case of the SRL precincts, the area within 1.6 km of a station is about 8 km<sup>2</sup>, which is about 6 times the size of the Hoddle grid in Melbourne's CBD. In fact, each SRL Precinct is larger than the combined area of both the Docklands urban renewal precinct (1.9 km<sup>2</sup>) and the Fishermans Bend urban renewal precinct (4.8 km<sup>2</sup>)</li> </ul> <p>The plans are vague on housing densities in other areas.</p>	<p>Revise relevant LUFs to address these matters</p>
<u>Integrated transport</u>		
<p><b>GAP:</b></p> <ul style="list-style-type: none"> <li><i>Need to address national context, guidelines and initiatives for all transport modes</i></li> </ul>	<p>Need to address national context, guidelines and initiatives for all transport modes as these will affect state project delivery and public and private sector investment processes (e.g. National Airports Safeguarding Framework, transport safety and security</p>	<p>An integrated transport plan for Victoria prepared as mandated under the Transport Integration Act 2010 would address this. In the absence of such a plan each regional planning strategy (Plan Melbourne, Regional Growth Plans and now LUFs) must address national and state influences</p>
<p><b>GAP:</b></p> <ul style="list-style-type: none"> <li><i>LUFs seem to be silent on the details and reasons for transport connections outside each region</i></li> </ul>	<p>LUFs seem to be silent on the details and reasons for transport connections outside each region. For example, the Inner South East plan seems to be silent on transport connections north of the Eastern Fwy – esp. from Kew and Camberwell Junctions – and on north south connections south of Caulfield.</p>	<p>Address the broader transport connects between regions.</p>



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	<ul style="list-style-type: none"> <li>• Don't residents of Boroondara yet cross the Yarra River in the 21st Century?</li> <li>• Aren't there any strengths in the region to the north that would give reasons for travel and benefit to the Inner SE region?</li> </ul>	
<u>Liveability</u>		
<p><b>Aboriginal cultural heritage</b></p> <p><b>GAP:</b></p> <ul style="list-style-type: none"> <li>• <b>Use Aboriginal Country Plans in Planning Policy Frameworks</b></li> </ul>	<p>The TCPA is pleased to note that some very informative Aboriginal heritage material has been included in LUFs. Country Plans are being prepared by registered aboriginal groups across Victoria. They contain much valuable environmental and cultural context for Victorian landscapes.</p>	<p>Country Plans should be incorporated into all metropolitan and regional strategic planning frameworks.</p>





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	<p>(e.g. Melbourne High). They don't seem to rate a mention beyond being attractive for residents' housing choices.</p> <ul style="list-style-type: none"> <li>• Combined they are significant employers and have high student numbers. So, how does their distribution influence the LUFPs?</li> </ul>	
<p><u><i>Sustainability and resilience</i></u></p>		
<p><b>Urban heat environments and Urban tree canopy</b></p>	<p>For several years, the TCPA has supported student research at Melbourne University addressing urban heat and green spaces at the local level.</p> <p>It is pleasing to see these themes being introduced into regional planning and the LUFPs.</p>	<p>No action required</p>
<p><b>GAP:</b></p> <ul style="list-style-type: none"> <li>• <b>Health impacts and the transport sector</b></li> </ul>	<p>Need to address the health impacts being increasingly raised in terms of transport networks. These include chronic diseases, sleep deprivation and cognitive learning impacts and are increasingly appearing in World Health Organisation (WHO)-led studies and publications across the transport sector.</p> <p>Measures to address aircraft noise impacts are currently the most developed and mapped, but even those are anticipated be refined in response to work being undertaken by the International Civil Aviation Organisation in conjunction with the WHO.</p>	<p>Revise relevant LUFPs to address these matters</p>



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<p><b>GAP:</b></p> <ul style="list-style-type: none"><li>• <i>Critical infrastructure risks</i></li></ul>	<p>Critical infrastructure risks – e.g. Major hazard facilities, transport, energy, financial institutions and communication networks</p> <p>Safety and security threats on and community impacts from critical infrastructure, whether that be from facility operations, criminal actions or terrorist events.</p>	<p>Revise relevant LUFs to address these matters</p>