

13.8	Submission to Developing a Plan for Victoria
Directorate	City Futures
Director	Kelvin Walsh
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Attachment(s)	1. Plan for Victoria Submission June 2024 [13.8.1 - 28 pages]

Purpose

For Council to consider endorsing the draft Submission to Plan for Victoria (the Submission) shown at **Attachment 1**.

Officer Recommendation

That Council notes and endorses the Submission to Plan for Victoria, shown at Attachment 1, and submits to the Department of Transport and Planning.

Background

The Victorian Government (Government) and councils play a critical role in how cities and towns are planned and grow. In 2017 the Government adopted a metropolitan planning strategy, Plan Melbourne 2017-50, to guide land use planning and development across metropolitan Melbourne. Integrating long-term land use, infrastructure and transport planning, Plan Melbourne aimed to set out the strategy for supporting jobs and growth, while building on Melbourne's legacy of distinctiveness, liveability and sustainability. One of the key elements of Plan Melbourne was the concept of 20 Minute Neighbourhoods, which aimed to encourage 'living locally' by enabling people to meet most of their daily needs within a 20-minute return walk from home.

The Government estimates that by 2050 Victoria will be home to more than ten million people, with eight million forecast to live in Melbourne and over two million in regional Victoria (Department of Transport and Planning, 2024). In response to this growth and change, the Government has commenced the preparation of a 'Plan for Victoria' (the Plan), which will supersede Plan Melbourne. This work started in late 2023, with the Government facilitating round table discussions and webinars with leaders and key decision-makers across local government, and the housing, development, environment and community sectors.

The Government has indicated that the Plan will focus on delivering more homes near transport, job opportunities and essential services in vibrant, liveable, and sustainable neighbourhoods with smarter and more sustainable solutions to support future growth.

The Government has commenced a second round of engagement to inform the development of the Plan, with feedback sought on four pillars comprising:

1. Affordable Housing and Choice
2. Equity and Jobs
3. Thriving and Liveable Suburbs and Towns
4. Sustainable Environments and Climate Change

Matters for Consideration

Options

The following options are available to Council:

- A. Endorse the Submission to Plan for Victoria, shown at **Attachment 1**.
- B. Endorse the Submission to Plan for Victoria shown at **Attachment 1**, with changes.
- C. Determine not to endorse the Submission to the Plan for Victoria shown at **Attachment 1**, with no further action.

The officer recommendation is Option A. The Submission to Plan for Victoria aligns with previous advocacy to the Victorian Government, is consistent with Council policy or consistent with best practice strategic planning principles.

Analysis

Consultation on Plan for Victoria provides an opportunity for Council to input into a new statewide integrated land use planning and transport strategy. Council's submission includes 33 recommendations responding to key priorities, with a focus on:

- Transforming Brimbank
- Planning for an integrated activity centre network
- Providing housing choice and diversity
- Establishing a regional planning approach
- Delivering planning certainty

A summary of the key recommendations includes:

- Reaffirming key rail infrastructure projects critical to the transformation of Brimbank including the importance of Melbourne Airport Rail, the Sunshine Super Hub, Keilor East Station and reconstruction of Albion Station.
- Reaffirming the need for a clear activity centre framework and hierarchy, including the identification of Sunshine as a Metropolitan Activity Centre (MEAC) and National Employment and Innovation Cluster and elevation of the Sydenham (Watergardens) to a MEAC.
- Development of business investment strategies and integrated transport solutions that support and connect activity centres.
- Improved connectivity including an expanded rapid bus network, upgrading the Calder Freeway, and electrification of the Wyndham Vale and Melton corridor rail lines.
- Development of a metropolitan housing strategy and housing targets based on realistic population projections.
- Reforming planning policy provisions and zoning to guide and support appropriate development in appropriate locations.
- Support to identify grey field urban renewal areas.
- Identification of surplus State Government land for urban renewal.
- Continued support and guidance to achieve the concept of living locally.
- The establishment of a regional approach to planning where land use issues cross municipal boundaries (i.e. contaminated land, Major Hazard Facilities, separation distances and flood mapping).
- Acknowledging the impact that aircraft noise has on human health and the need for mitigation and compensation in buildings that were constructed prior to the application of the Melbourne Airports Environs Overlay.

- Committing to the redevelopment of Sunshine Energy Park as a regional open space.
- Improved certainty and protection of high value eco systems including the management of State significant conservation assets.
- Development of regional land-use framework plans.
- Continuation of existing policies in Plan Melbourne that remain relevant.
- Ongoing support for the Urban Growth Boundary aligned with funding to support the preparation and implementation of Green Wedge Management Plans.
- Development of an approach to distribute any value uplift to land (i.e. for the purpose of social or affordable housing).
- Preparation of an implementation program and monitoring process for the new Plan.

Submissions are due to DTP by 30 June 2024 and a further round consultation has been flagged from 1 July to 30 August 2024. It is anticipated that a new Plan for Victoria will be finalised and released in late 2024.

Community Engagement

The Department of Transport and Planning is undertaking community consultation on the Engage Victoria site and has invited public submissions by 30 June 2024. In late 2023, the Government also conducted some round table discussions and webinars with leaders and key decision-makers across local government, and the housing, development, environment and community sectors.

Resource And Risk Implications

Resource requirements for the preparation of the Submission have been met within the Annual Budget 2023/2024.

Community: potential impact on community, including public trust and customer service impact

- Yes – Plan for Victoria will be the overarching strategic planning and land use document prepared by the Victorian Government and inform future strategic planning policy documents across Brimbank. This will be of interest to the community, may be politically sensitive and impact Council resources.

Environmental: impacts on environmental sustainability, including water/waste management, climate change, and contaminated land

- Yes – A proposed pillar within Plan for Victoria is 'Sustainable Environments and Climate Action' and this will impact on environmental sustainability.

Financial: significant financial impacts

- Yes – Plan for Victoria may have financial implication for Council as it may require Council to undertake additional or new strategic planning work.

Regulatory: legal, legislative or regulatory implications including the rights/obligations of stakeholders

- Yes – Plan for Victoria will guide strategic land use planning across Brimbank and impact on State, regional and local planning policy. Plan for Victoria will inform future strategic planning policy documents including the preparation of planning scheme amendments.

Safety: health, safety or duty of care impacts

- None – A proposed pillar within Plan for Victoria is 'Thriving and Liveable Suburbs and Towns' and this will impact on the safety of local communities.

Legislation/Council Plan/Policy Context

This report supports the Council Plan 2021-2025 strategic direction and objective of:

2. Places and Spaces - Liveable and connected neighbourhoods that support healthy and sustainable futures - A green place for all

- Liveable and Connected - Inviting and liveable spaces and facilities, connected so people can get around
- Sustainable and Green - Protect natural environments for current and future generations

3. Opportunity and Prosperity - A future focused, transforming city where all have opportunities to learn and earn - A prosperous place for all

- Growing and Transforming - Optimise community opportunities through infrastructure innovation and investment
- Earning and Learning - Everyone has access to education, training and lifelong learning to support their aspirations

4. Leadership and Governance - A high performing organisation that enacts the vision and decisions of Council through the delivery of quality and innovative services - A fairer place for all

- High Performing and Accountable - Our workforce strive to enhance services and liveability for the Brimbank community.

The Draft Submission draws on priorities identified in adopted Council strategies and policies and relevant state government plans, including the Brimbank Housing and Neighbourhood Character Strategy 2024, Brimbank Advocacy Plan 2023-25, Brimbank Transport Priorities Paper 2022, Sunshine Priority Precinct Vision 2050, Brimbank Activity Centre Strategy 2018, Sunshine Station Super Hub Urban Design Principles 2019, Brimbank Position Statement of Social and Affordable Housing 2022, and Brimbank Economic Development Strategy 2022-2027.

Council officers contributing to the preparation and approval of this report, have no conflicts of interests to declare.



Submission

Plan for Victoria

June 2024

Foreword

Brimbank City Council (Council) welcomes the opportunity to inform the development of the Plan for Victoria and stands ready to support the development of this important plan.

Over the past decade Council has worked to build a positive and inclusive vision for the future aimed at elevating its key activity centres, neighbourhoods and business communities into prosperous environments.

Council considers that a new Plan for Victoria provides a great opportunity to reaffirm policy and strategy outlined in past metropolitan and regional strategies that have begun to build a strong polycentric metropolis and regional city network and continue to build on existing and emerging strengths and opportunities moving forward.

This submission will focus on Brimbank's role in contributing to a greater Melbourne area and western region of Victoria as input into delivering a framework that continues to deliver a sustainable, liveable, equitable, connected and prosperous future.

This submission focuses on:

1. The importance of Brimbank in supporting growth and development as part of a growing Melbourne.
2. The need for committed investment in transformative projects to support Brimbank to grow and develop.
3. The need to address climate change impacts through consistent, metropolitan wide policy, strategy and actionable approaches.
4. The need to plan for a clear hierarchy of centres with Sunshine and potentially Sydenham as activity centre anchors for jobs and residential growth.
5. Provide clear policy, strategy and statutory direction to deliver housing choice and diversity across metropolitan Melbourne.
6. Urgent reform to the infrastructure/developer contributions systems to provide services and infrastructure for growing communities.
7. Work across council boundaries on regional matters to resolve a range of complex issues with key state agencies taking the lead.
8. Continue to progress key principles and objectives from previous metropolitan strategies and revise/reform to continue to guide growth and development strategically.
9. Develop a clear partnership approach with local government to implementation and delivery.

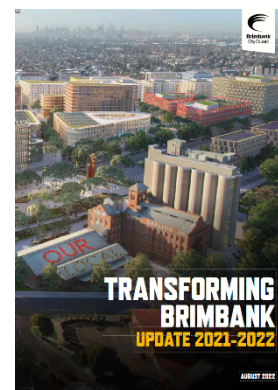
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Transforming Brimbank

There is significant opportunity to help grow Brimbank into a vibrant, prosperous region given its strategic position within the heart of Melbourne's west. Brimbank has, and will continue to play an important and increasing strategic role within the west of Melbourne given its strong regional connections to central Melbourne and western Victoria.

Click here for more information: [Transforming Brimbank](#)



Capitalising on Brimbank's unique opportunities

Brimbank has a vibrant and culturally diverse community with a population of 196,000 in 2021 which is forecast to grow to 212,500 by 2036¹. Almost half of all residents are born outside Australia with a majority speaking a language other than English at home.

Brimbank currently provides 86,000 local jobs and generates \$11B in gross regional product because of its diverse range of specialised industries across a range of sectors and 2,000 hectares of industrial zoned land. This provides a strong competitive advantage to continue to support growth and development of western Melbourne with Sunshine at its heart.

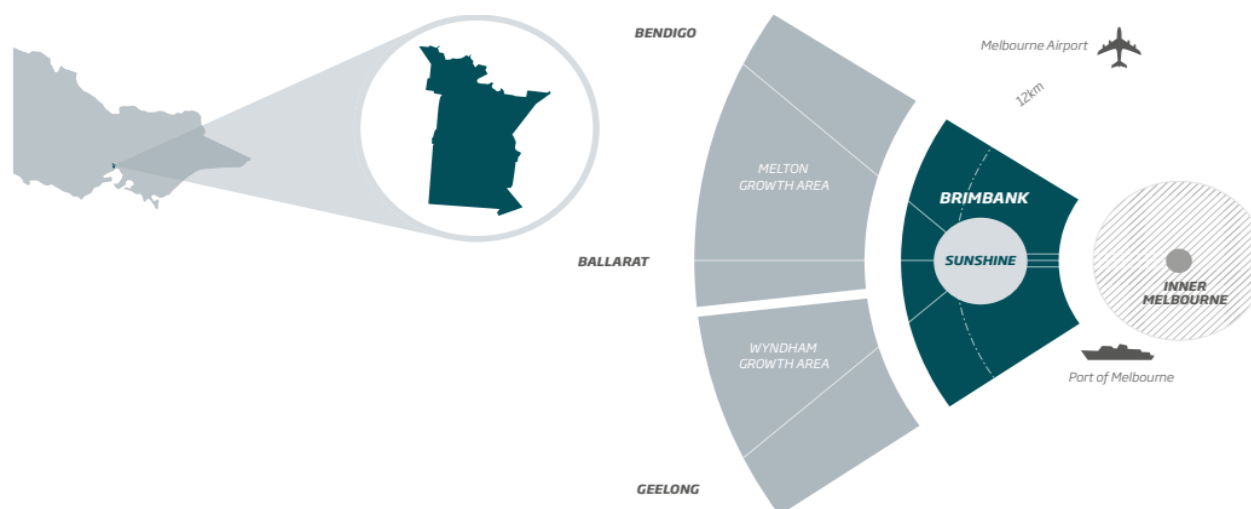
The Sunshine Priority Precinct has, and will continue to be the focus of significant investment through transformational rail projects and station redevelopment. This investment, once realised, will drive jobs and residential population growth that will transform the Sunshine and Albion precinct into the CBD of the west with a greater focus on health, wellbeing and education further diversifying the region's economic contributions.

While significant work has been undertaken Brimbank continues to experience significant socio-economic disadvantage. It is currently the third most disadvantaged local government area in Victoria and the second in metropolitan Melbourne.

There is a significant opportunity for both State and local Government to leverage public and private investment to create uplift through a range of opportunities. A commitment to a continued strong partnership and collaboration approach between local and State Government that is underpinned by an agreed vision will be key to realising our mutual aspirations.

¹ Victoria in Future 2023, State Government of Victoria

Figure 1: Brimbank within the context of the west.



Leveraging investment to transform Brimbank

Transforming Brimbank aims to leverage \$20 billion of State Government infrastructure investment to deliver meaningful and generational change for the Brimbank community and Melbourne's west. The window of opportunity to maximise the community impact of this investment is small and requires urgent action.

The Transforming Brimbank program seeks to leverage Government's substantial infrastructure investment so that it not only delivers transformation of metropolitan Melbourne, but also create meaningful change and uplift for residents in Brimbank and Melbourne's western region.

This includes delivery of projects such as Melbourne Airport Rail (MAR), including the Keilor East Railway Station, the Sunshine Health, Wellbeing and Education Precinct, the Sunshine Super Hub and the western section of the Suburban Rail Loop, which are critical for Brimbank and the western region.

These projects deliver critical infrastructure that support Melbourne's growth and development, underpin Sunshine as a Metropolitan Activity Centre (MEAC), a National Employment and Innovation Cluster (NEIC), and enhances Brimbank as a place to invest, conduct business and work.

Strategic investment that leads to regional benefits

Delivery of the MAR will benefit communities of western Victoria and Melbourne's west, as well as metropolitan Melbourne by improving access and connectivity. It will establish Sunshine as an important gateway to Melbourne and Victoria. MAR also establishes Sunshine as a key visitor destination through the development of an integrated Sunshine Station Super Hub that connects MAR to western Victoria

and the regional cities of (Geelong, Ballarat and Bendigo), as well as train lines serving growth corridors in Hume (Sunbury), Melton and Wyndham. More than this, Sunshine is positioned to emerge as a leading functional economic area delivering new economic opportunity and contemporary jobs growth. As Victoria's west grows, employment and population are shifting westward. The growing communities of Melton, Sunbury and Wyndham along with Victoria's broader western region require locally based accessible employment and economic opportunity. Sunshine is positioned to help rebalance Victoria's economy toward its population centres in the west.

Strategic investment that leads to local benefits

Airport accessibility and connectivity are common elements of a thriving global city and while the majority of the world's busiest airports have mass transit connections, there are only 17 that have no rail connection, including Melbourne Airport.

Critically, the road network servicing Melbourne Airport is insufficient to service its long term growth, which is forecast to double to more than 76 million by 2042. The timely delivery of SRL Airport is not only essential to ensure Melbourne Airport can grow to meet forecast demand – it is also key to ensuring efficient, reliable, equitable and sustainable access to and from Melbourne Airport for Victorians and visitors to Victoria.

RECOMMENDATIONS

1. Reaffirm the importance of the Melbourne Airport Rail project and Sunshine Super Hub to metropolitan Melbourne and Victoria.
2. Retain the status of the State Government's planned new Regional Platform project at Sunshine Station.
3. Reaffirm and commit to the reconstruction of Albion Station as part of a package of access and connectivity improvements for the Albion Quarter Precinct.
4. Reaffirm the construction of a new train station at Keilor East, as part of Melbourne Airport Rail.

Planning for climate action

In 2020, Council released the [Brimbank Climate Emergency Plan 2020-2025](#) to co-create a future with its community that is free from fossil fuels and to become more resilient to climate change. The Plan focuses on five themes: people power; 100% Renewable; Resilient Rebuild; Green and Cool; and Circular Economy.

A new Plan for Victoria must take bold, strategic, measured action to continue action towards a net zero future, builds a resilient urban environment and avoids the natural environmental impacts of a changing climate.

Building a greener more resilient urban environment

Urban heat poses an increasing danger to communities in Victoria². Among all the impacts of climate change, urban heat and heat waves presents a serious health risk. Presently, extreme temperatures result in an annual economic loss of \$87 million in Victoria, a figure projected to rise to \$179 million by 2030³.

To combat this, Council is undertaking a bold approach to increase Brimbank's tree canopy from 6.2% to 30% over the next 30 years⁴. The strategy ensures trees are at the forefront of Council's decision making process, to improve liveability throughout Brimbank. This strategy has been developed in line with the [Greening the West Strategic Plan](#) which promotes a regional approach to greening particularly through the planting of trees.

There is a critical need to rethink Melbourne's approach to tree planting protection. Only a whole of government and community led approach will achieve the protections and enhancements needed to ensure that a more dense Melbourne is coupled with a more greener environment.

Council would encourage the State Government to follow the lead of many local governments in setting a target in planning policy to achieve a minimum canopy cover of at least 30%. Establishing a clear policy will ensure a unified commitment to creating a greener more resilient environment to the impacts of urban heat island.

In addition, Council would also encourage exploration of formal processes, built around available tools within the Victoria Planning Provisions to achieve protection and encourage greening as part of new development.

² State of Victoria (2022) *Health and Human Services Climate Change Adaptation Action Plan 2022-2026*

³ State of Victoria (2019) *The economic impact of heatwaves on Victoria*, DELWP

⁴ Brimbank City Council (2016) *Urban Forrest Strategy 2016-2046*

Finally and most importantly, a new Plan for Victoria must foster a collaborative approach with local communities to ensure a mutual understanding of the value that urban greening brings and why protecting and enhancing canopy cover as part of an urban forest approach will create positive outcomes long term for our urban environment.

Achieving environmentally sustainable development.

A considered and consistent approach is needed to mitigating and adapting to the effects of climate change on built form within Victoria's planning and building systems.

Local Government have taken various approaches to achieving Environmentally Sustainable Design (ESD) outcomes in an effort to ensure new development meets higher environmental and sustainability performance standards. There is an opportunity for the State to take provide greater leadership to ensure that all LGAs are progressing approaches that deliver elevated and consistent ESD outcomes.

In 2022, Council welcomed the much anticipated introduction of updates to the Planning Policy Framework of all planning schemes (VC216) and the release of the ESD Roadmap. Policies and strategies related to neighbourhood batteries and gas substitution linked with the *Renewable Energy Action Plan 2018* that complement this road map are commendable steps forward.

Moving forward, a State led approach that establishes a consistent approach across both planning and building systems must be priority if a new Plan for Victoria is to provide policy and strategy direction to achieve sustainable development delivering the ambitious target of 2.2 million⁵ new homes over the next 30 years.

Within this context, considerations should be given to implementing a consistent ESD suite of assessments tool within the Victoria Planning Provisions that is consistent with the Victoria's Building Regulations and the National Construction Code as part of the next phase of the ESD road map. Council looks forward to being consulted and contributing to this important initiative.

⁵ Victorian State Government (October 2013) *Housing Statement*

Establish a catchment response to flood hazard mapping in planning schemes.

Successive metropolitan strategies have progressively and with increasing urgency outlined the threat posed by a range of natural hazards and the impacts that a changing climate will pose across Melbourne and regional Victoria.

Flood risk is a focus for Brimbank. Existing flood information in planning schemes, including Brimbank's, is patchy and outdated and leaves new development at risk of being built in areas vulnerable to riverine and overland flooding.

The need for a consistent methodology and approach to updating flood mapping in planning schemes was a key recommendation of the 2011 inquiry into flooding across the State led by former Victoria Police chief commissioner Neil Comrie. Unfortunately limited progress has been made in this regard since those recommendations were provided to the State Government.

Flooding does not discriminate when it comes to municipal boundaries, however the processes and procedures that are currently in place rely on individual councils to progress planning scheme amendments to introduce flood mapping. A catchment based approach to the inclusion of flood mapping into planning schemes is essential and must be based on a current scientific data that is applied via a consistent methodology to tackle this issue moving forward.

Implementation and updating of flood mapping across metropolitan Melbourne, is best led by Melbourne Water as the designated Floodplain Management Authority under the *Water Act 1989*. Implementation into planning schemes must be progressed in partnership with local government and implemented via a group amendment process. This will ensure flood mapping is up to date and consistent across municipal boundaries.

RECOMMENDATIONS

1. Establish a consistent metropolitan wide policy and urban canopy target approach coupled with the application of appropriate planning scheme tools to protect and enhance an urban greening outcome.
2. Finalise and release stage 2 of the ESD roadmap for local government input. Ensure any proposed roadmap identifies the required planning provisions to support development decision making that is consistent with the building regulations and national construction code.
3. Empower Melbourne Water, as the designated Floodplain Management Authority to progress flood modelling and mapping and its implementation into

planning schemes at a catchment level in partnership with local government via a group amendment process.

Planning for an integrated activity centre network

Council continues to support the principle and approach of developing a polycentric city and the need for significant growth and development across the metropolitan area, with a focus on National Employment and Innovation Clusters (NEICs), Metropolitan Employment Activity Centres (MEACs) and Major Activity Centres (MACs), health and wellbeing precincts and state-significant industrial precincts.

Confirm Sunshine's role as a NEIC and MEAC

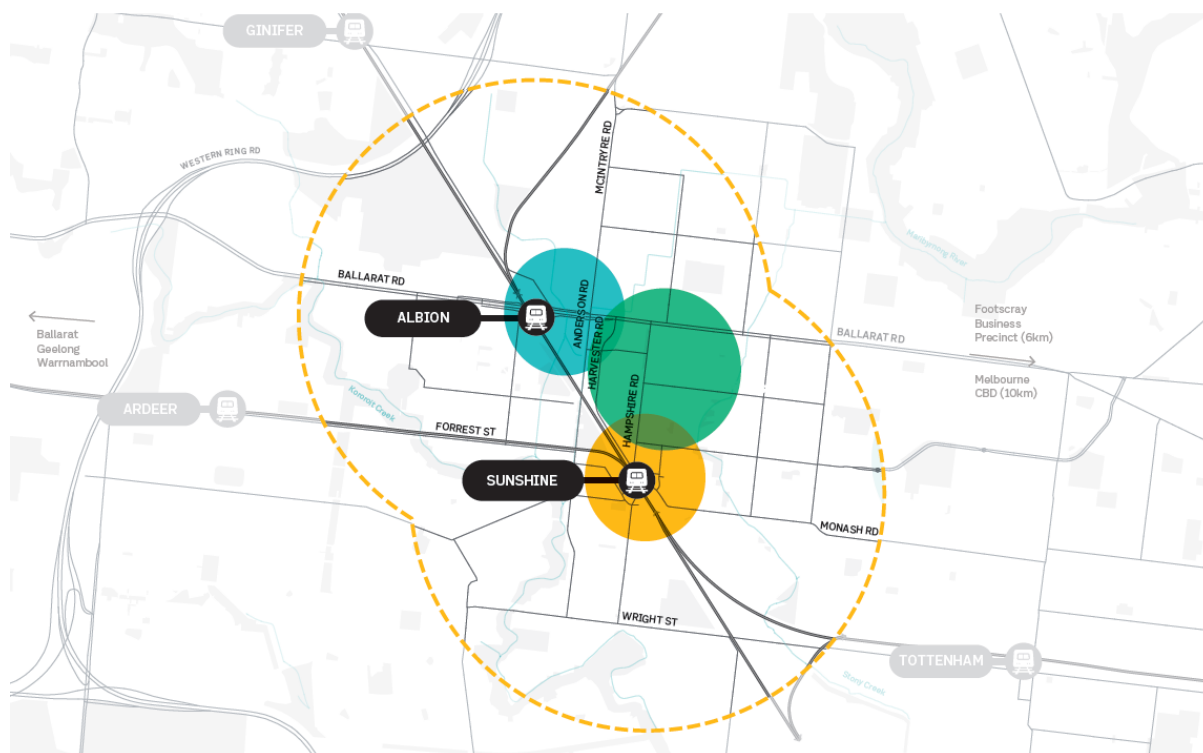
Brimbank and Melbourne's west is expecting billion-dollar investments in infrastructure in the next 10 years. Most of this will be in the Sunshine Precinct, which may see up to 43,000 additional residents and an additional 29,000 jobs created by 2051.

The Victorian Government's "[Sunshine Precinct Opportunity Statement](#)" outlines how Sunshine has a unique opportunity to attract a broader range of businesses, including office, retail services and entertainment, as well as residential development. A continued partnership approach between State and local Government is required to encourage the growth and development of Sunshine including its unique profile, competitive strengths, role and stage of development.

An essential element of a more compact and efficient future form of Melbourne is the ongoing need to preserve land and progress opportunities to create more jobs across Melbourne's established Major Activity Centre network. As part of Plan Melbourne Refresh 2017-2050, Sunshine was identified as one of four metropolitan employment centres with Clayton/Monash, LaTrobe, and Werribee being the others. The focus of these centres was to create areas of specialised activity and job creation, building on existing anchor tenants, such as Victoria University and Sunshine Hospital in Sunshine, with great access to public transport.

Planning policy to be developed as part of a Plan for Victoria must continue to take account of the strategic opportunity and role Sunshine has in developing Melbourne's west and leveraging of the significant rail investment planned. Council continues to support and encourage a precinct-based approach, to guide employment and residential growth and development with policy and statutory frameworks.

Figure 2: Sunshine Priority Precinct



Establish Sydenham as a MEAC

Reaffirming the role of Sunshine, as well as the strategic importance of the NEIC area which includes the Sunshine Health Wellbeing and Education Precinct (SHWEP) has a fundamental relationship to planning for other activity centres in Brimbank.

Sydenham, which includes Watergardens Shopping Centre, continues to grow and service a wide population catchment. Served by both Vline and Metro train services, it functions as a major transport interchange in Brimbank's north-west. Council estimates that Sydenham/Watergardens has potential retail floorspace growth of an additional 30,000 sqm when assessed against population projections to 2036⁶.

Establishing Sydenham (Watergardens) as a MEAC within Melbourne's broader Activity Centre structure will address a significant gap in strategic policy at present and would provide a balance to planning and development within Brimbank.

There is significant land capacity in and around the Watergardens complex and immediate areas surrounding it, including the Watergardens Train Station that can facilitate additional jobs and residential growth and development into the future. Work being progressed as part of the 10 Activity Centres, in particular with

⁶ Draft Activity Centre Economic Analysis (2024) Charter Keck Cramer

Chadstone and Ringwood (given major land holdings are held in single ownership) may present an opportunity to apply learnings to work with a major land holder to diversify their approach.

Figure 3: Sydenham Town Centre



Build effective policy and strategy to support 20 minute neighbourhoods and place making.

Council seeks to deliver community services and infrastructure in line with the principle of 20 minute neighbourhoods through its [Community Services and Infrastructure Plan 2018-2038](#). Council aims to deliver, where feasible, community facilities close to activity centres, community focal points, public transport, pedestrian and cycling networks however there are challenges in achieving this given existing land ownership and it can be more feasible for Council to deliver services on existing sites located out of centre.

Brimbank has 53 activity centres that sit below the existing NEIC and MEAC or MAC metropolitan framework designations found in Plan Melbourne that are of varying sizes and perform a variety of roles and functions relative to the immediate and broader communities.

Sunshine has, and will continue to be the focus for jobs growth and attention given its strategic location and accessibility opportunities. As mentioned above,

Sydenham has emerged as Brimbank's second MEAC, establishing both as anchors servicing both the north and south of the municipalities.

St Albans, Deer Park and Brimbank Central play a critical role in servicing their immediate communities in addition to a broad range of neighbourhood activity centres (e.g Cairnlea, Taylors Lakes, Keilor Village, Keilor Downs, Delahey and Derrimut) and smaller Local Activity Centres that service and immediate area.

Irrespective of the size and place each centre plays in providing goods and services to its communities of interest, the role of a healthy, vibrant and accessible activity centre significantly contributes to the quality of life and economic development potential for all areas of Brimbank.

The 20-Minute Neighbourhood principle was a cornerstone of Plan Melbourne. It aims to create local hubs where people can access services, like health facilities, parks and shops within a 20-minute walk from home.

Council has welcomed funding to support place making opportunities such as the grant for Glengala Road Shopping Centre. The investment is contributing to a revitalisation of this popular shopping strip, making it vibrant, healthy and better connected.

Council would continue to encourage State Government to build on Direction 5 'Create a city of 20 minute neighbourhoods' by continuing to refine policy, strategy and potential statutory mechanisms that evolves this key urban place making element further.

Council would also support policy reaffirmation of the broader Activity Centre network and the role it plays in delivering localised growth and development opportunities through appropriate gentle density measures.

Figure 3: Glengala Shops, Sunshine West.



Ensure integrated transport outcomes are achieved across the network.

Critical to the success of any activity centre network is how they are connected by walking, cycling, public transport and private vehicles. An integrated transport planning approach which priorities pedestrians and cyclist is needed across Melbourne if all of its activity centres are to contribute to an effective urban network of more dense neighbourhoods that also realise opportunity of being 20-minute neighbourhoods.

While Brimbank is serviced by three train lines (Wyndham Vale, Melton and Watergardens/Sunbury), there is limited public transport serving the municipality, especially when compared to the north, east and southern areas of Melbourne. The underinvestment in public transport is a legacy of Melbourne development, however Melbourne's west is now one of the fastest growing regions in Australia and requires substantial and sustained investment to support its growth and development.

Within Brimbank, this can occur through the delivery of a rapid transit bus service that can support the remaining urban renewal areas like Cairnlea and River Valley Estate and connecting existing residential areas to train stations and employment centres. Transport projects including the electrification of the Melton and Wyndham Vale rail lines also provide opportunity to grow and develop areas adjacent to these lines.

RECOMMENDATIONS

1. Confirm the role of Sunshine as a MEAC and NEIC to maintain a partnership and precinct based approach focusing on job creation, growth and investment facilitation.
2. Include Sydenham (Watergardens) as a Metropolitan Activity Centre within Melbourne's Activity Centre Framework given its strategic location, role and function is plays in servicing a broad catchment and access to transport services.
3. Reaffirm a clear Activity Centre planning framework and policy approach that provides clear direction on the role, function and development capacity across all levels Melbourne's Activity Centre network and as part of an integrated transport network.
4. Develop business investment strategies for each MEAC, MAC and NEIC that support long term strategic planning identifying and defining economic outcomes and preconditions for investment.



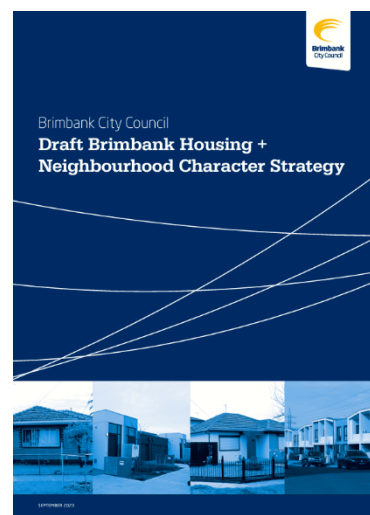
5. Develop integrated transport planning solutions that focus on active and public transport links connecting activity centres to improve local and regional access and support planned rail investments.
6. Commit to the delivery of key transport projects in Melbourne's west to improve connectivity, accessibility, safety and economic development, including Melbourne Airport Rail, a substantially expanded rapid bus network, upgrading the Calder Freeway to an urban standard and the electrification of the Wyndham Vale and Melton corridor rail lines.

Providing housing choice and diversity

Councils have invested significant time and effort to apply reformed residential zones over the last decade. A metropolitan housing strategy is needed to guide the implementation of targets coupled with reforms to planning controls to achieve appropriate densities in the right locations serviced by public transport.

Provide clear state led policy and strategy to inform local government housing strategies

In April 2024, Council adopted the [Brimbank Housing and Neighbourhood Character Strategy 2024](#). A key focus of the Strategy is to deliver diverse, connected and green neighbourhoods offering range of high quality, sustainable housing choices for everyone at every stage of their lives and to accommodate an additional 34,000 residents and 14,000 dwellings by 2041.

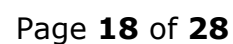


A key challenge facing Brimbank, and most municipalities, is the ability to support the delivery of a diverse housing market to cater for an increasingly diverse arrangement of household types and an older population. Currently, 80 per cent of Brimbank's housing supply is provided in detached dwellings built between the 1950's and 1980's on relatively large allotments. Research undertaken as part of the Strategy indicates that maintaining this supply of housing type will not meet the needs of a future Brimbank population.

To service future needs, the Strategy focuses (see Figure 4) on greater diversity in a range of housing types across strategically applied residential zones. Coupled with existing activity centre policy and strategy Council's residential growth strategy positions significantly increased housing choice and density at strategic locations where access to employment, goods and services are easily accessed by public transport.

To support Brimbank, and other councils to deliver well designed and well located housing requires a consistent metropolitan approach. Consideration should be given to progressing the development of a metropolitan housing strategy that is reviewed every 5 years. This strategy should identify the policy and overall strategic and statutory approach that will help support and guide local delivery. Any strategy must put people first and build consensus on densification in the right places.

Submission by Brimbank City Council – Plan for Victoria
Attachment 13.8.1



Develop meaningful and achievable strategic housing targets to inform metropolitan housing strategy in partnership with local government.

Housing targets, if progressed, should be strategic and mindful of a council's ability to influence the housing development market beyond the planning and building systems they administer.

Council has and will continue to facilitate development across Brimbank through its planning scheme however it should be noted that while permits are issued, not all proceed to construction. For example, within the Sunshine MEAC over the last 5 years, active permits have the potential to deliver 972 new apartments. However over this same period, approximately 564 apartments will not progress due to lapsed planning permits. This demonstrates the important role the market plays in the delivery of housing, including but not limited to inflation and the cost of construction, high interest rates, rising wages and labour shortages and other commercial factors.

The translation of planning permits to building permits is also linked to market confidence in the delivery of the MAR and other city shaping infrastructure flagged by the State Government for Sunshine.

Should State Government wish to progress a housing target approach then it should be mindful of the need for it to be strategically focused in its intention rather than as a punitive measure. As has been demonstrated by Council's effort in progressing a thorough and well considered housing strategy and permit assessment program, Council's ability to effect change in housing supply beyond the planning scheme is limited.

Council would welcome, and support development of a commitment to long term program of action where the State Government works in partnership with local government to set targets and their regular review as part of metropolitan wide program.

Council also encourages increased dialogue with the State Government on where opportunities exist to unlock existing supply, or ease/adjust levers at its disposal to increase housing supply across the market.

Reform planning provisions and provide design guidance that supports a metropolitan housing strategy.

There is a significant need to provide greater clarity and certainty through modernised residential and activity centre policy, and strategy and zoning

provisions to achieve greater housing choice and density, particularly low rise apartment development, supported by localised implementation.

For over a decade, residential and activity centre policy has lacked the necessary clarity to guide appropriate densities that a modern metropolitan city like Melbourne needs. Shifting towards the right housing supply to meet the needs of a diverse range of people must be a key objective of any new Plan for Victoria.

Part of delivering the right supply needs a focus on providing more housing that falls between single-family homes and higher density apartments, which is often referred to as "missing middle". This missing middle is reflected within the statutory provisions of the VPPs with a significant gap in policy, guidance and statutory control relating to apartment development that is greater than 4 storeys but less than 10 storeys.

Future Homes, which focuses on up to 4 storeys, while admirable in its intentions, and the Better Apartment Design code, which focuses on high rise apartments, confirms the need for a low to mid rise apartment code that supports appropriate development outcomes.

The development of a new low rise code is needed, that is delivered within a reformed suite of existing residential zone controls which is balanced with the need to protect areas of heritage significance. This approach will support the time, effort and investment into strategically identifying and facilitating growth and development across municipal areas to deliver the housing requirements of a growing city.

RECOMMENDATIONS

1. Progress the development of a metropolitan housing strategy in consultation with local government that is reviewed every 5 years, which sets the policy, strategy and statutory framework to guide localised delivery.
2. Implement housing targets that are based on consistent population projections and reviewed regularly being mindful of council's ability to influence the housing market.
3. Progress reformed residential and activity centre policy, strategy and zoning provisions to deliver the policy and strategy objectives outlined in a state led housing strategy.
4. Prioritise the development of planning provisions and guidance that support appropriate development, particularly low rise apartment development.
5. Support councils to identify and plan for existing grey field areas suitable for redevelopment for higher density housing and lot consolidation



6. Continue to identify underutilised and surplus State Government land that has potential to deliver additional social housing.
7. Continue to support and give greater guidance to achieving the strategic concepts regarding 20 minute neighbourhoods and their delivery across Melbourne.

Establish a regional planning approach

Work in partnership with councils on a regional basis to address consistent land use planning challenges impacting growth and development of Melbourne's west. Unlocking these challenges will free up land for potential growth and development.

Utilise a regional partnerships approach to address matters that transcend municipal boundaries.

With the introduction of the regional section of Victorian Planning Provisions (VPPs) in 2017 came the opportunity to incorporate regional planning policy into planning schemes. Given regional issues can often cross LGA boundaries, it makes sense for State Government to lead the preparation of regional policy content, in close consultation with each council. State Government confirmed this leading role as part of Plan Melbourne 2017 – 2030, by including an action for the State to prepare Regional Land Use Framework Plans, with a view to implementing them into planning schemes.

State Government sought to act on this by preparing draft versions and consulting on regional plans in 2021 with Council endorsing a submission to the draft *Western Metro Land Use Framework Plan* on 24 October 2021. There has been no further action on this project since that time.

Without implementation, the Brimbank Planning Scheme contains very limited regional level planning policy. Given the importance of regional issues, and to honour its previous commitment, the State Government should continue to prepare and implement regional land use plans across metropolitan Melbourne, in close consultation with LGAs.

Address human health and environmental risk management matters as a priority to support growth and development.

Brimbank's industrial past has left a legacy of potentially contaminated land and landfill gas in parts of the municipality which impacts the feasibility of redevelopment for commercial and residential purposes.

Existing industrial activity and infrastructure including gas and fuel pipelines also create barriers for development through buffers that can reduce certain land uses, densities or the design of development. Brimbank's proximity from Melbourne Airport and location beneath flight paths also means it is impacted by the Melbourne Airport Environs Overlay and Noise contours.

The role of Worksafe Victoria in advising of impact around Major Hazard Facilities remains unclear and Council continues to support the progress of clarifying policy and statutory planning matters to ensure clear roles and responsibilities for planning around facilities occur.

It is imperative that State Government and state agencies such as the Environment Protection Authority and Worksafe Victoria work proactively with councils to address and manage these issues on a regional basis to facilitate the development of land for housing and employment.

Protect high value ecosystems through an integrated local, state and commonwealth conservation approach.

Currently there is a disconnect between local and state planning decisions, relating to planning and conservation, and the Federal Government process where developments are being approved without consideration of whether the ecosystems are actually allowed to be removed in the first place. This creates uncertainty in outcomes and can lead to extra work.

Also important for planning, is providing clear processes that provide a logical sequence in determining the extent (if any) and responses required to develop in areas where these ecosystems exist.

The process to assess conservation values is long and uncertain. It also requires significant time and funding – adding to planning assessment timeframes both from a developer and government perspective and also presents as a development risk. Those areas with the highest value ecosystems are then unfairly burdened by these issues.

A new Plan for Victoria should reduce uncertainty and confirm a recognition and support for retention of high value ecosystems. This should include a role for State Government to take on some of these conservation assets, in line with the State's own policies. In addition, a new Plan for Victoria should seek to identify areas that have high ecosystem value worthy of protection and potential inclusion into the public land estate, such as Solomon Heights, North Sunshine.

RECOMMENDATIONS

1. Develop a program that addresses the legacy of landfills and industrial development in Melbourne's west to support future development. This should include the process for assessing and remediating contaminated sites to reduce the uncertainty of clean-up requirements to expedite the transition of land to allow for residential development

2. Commit to a regional approach to managing the risk of development around Major Hazard Facilities, including high pressure gas pipelines, and identify clear statutory referral requirements within planning schemes.
3. Empower regional delivery agencies such as Melbourne Water, Environment Protection Authority, and Worksafe Victoria to progress and implement strategic planning work in partnership with councils.
4. Acknowledge the impact of aircraft noise on communities beneath flight paths, including Brimbank, and the need for mitigation and or compensation in buildings that were constructed prior to the Melbourne Airport Environs Overlay being applied.
5. Commit investment to the Sunshine Energy Park to realise the former landfills as a regional open space and sporting facility creating opportunities for connection to country, sport, recreation, education, events, recycling, energy production, food, habitat and social interaction.
6. Progress the development of policy and strategy that reduces uncertainty and confirms and recognises retention of high value ecosystems. This should include a role for State Government to manage regional and state significant conservation assets, in line with its own policies.
7. Finalise guidelines for separation distances for sensitive uses to guide appropriate land use outcomes across Melbourne.
8. Support the development and public release of the western (and other) regional land-use framework plans. This should include a review of infrastructure funding opportunities and constraints to ensure that infrastructure required to support existing and future communities can be provided.
9. Identify Melbourne Water as the leading agency tasked with progressing a catchment focused approach to flood mapping in metropolitan areas and implementing on a regional basis.

Provide the services needed for growing communities

To cater for Victoria's growing population, there will be a need for new and upgrade infrastructure to service growing communities. An efficient and effective contributions system will support both State and local governments in meeting infrastructure needs within their budgets. To ensure Victoria's infrastructure contributions approach leads to the best possible outcomes for all stakeholders, it must be clear, simple, fair and return value to local communities.

Apply a fair and equitable approach through value capture arrangements.

Council supports the implementation of the Wind Fall Gains Tax on rezoning of land that brings a significant capital improvement to land.

Most often, the rezoning's that lead to a commercial/residential outcomes are likely to lead to an uplift in resident population which councils must respond to with increased services. As a concerted effort for a more compact metropolitan form continues under a new Plan for Victoria, it is envisaged that the value capture opportunities will only continue to increase as land is converted into commercial/residential form.

At present, the gains extracted are returned to the State government's consolidated revenue with there being no transparency about how money collected is spent to create a better urban environment from where it has been collected from.

Council would strongly encourage the State Government to consider a more equitable approach to the distribution of a portion of the gains with value capture being returned to the local areas to support the delivery of increased local services.

Deliver an effective contributions system to reduce burdeon on local governments

The current system of section 173 agreements, Infrastructure Contributions Plans (ICP), Developer Contributions Plans (DCP) is disconnected, patchy, complicated and administratively burdensome. In particular, the DCP system carries significant barriers and risks for councils. Issues include but not limited to are the:

- cost of developing a DCP;

- time it takes to develop and have a DCP ministerially approved;
- complexity of DCPs and the expertise required to manage them effectively; and
- financial risks of entering into a DCP (a DCP locks in councils to deliver projects, even if development does not proceed and council cannot collect the levies).

For many councils, agreements struck under section 173 of the *Planning and Environment Act 1987* are the only realistic cost effective option to collect contributions for infrastructure.

The development of a new system must be underpinned by principles of fairness, certainty, transparency, efficiency, simplicity and affordability. Ideally a two tiered approach that focuses on local infrastructure and state infrastructure is needed. A local system would fund basic and essential infrastructure needed to support or respond to development while a state system to fund major state or regional infrastructure to unlock potential.

A number of reviews, with the most recent being *Infrastructure Contributions Advisory Committee* (established in 2021) have promised much sought after reforms to the ICP and DCP system with none having materialised into meaningful change.

If Melbourne is to become a more compact city with established areas becoming more of a focus of residential densification achieving 20 minutes neighbourhoods, then a more effective, efficient contributions systems must form part of the toolkit of an emerging Plan for Victoria.

RECOMMENDATIONS

1. Develop an approach that shares the uplift in land value gained from rezoning via the Wind Fall Gains Tax to be applied within the local area.
2. Establish an infrastructure contributions system that differentiates between local and state elements that is efficient, fair, provides certainty and transparency and is simple and affordable to implement embedded into the *Planning and Environment Act 1987*.
3. If the DCP system is to remain, provide much need reforms to establish a simple to administer and execute model with the relevant guidance and instruments to support.

Delivering planning certainty

Maintain and build on existing metropolitan planning principles and outcomes found in Plan Melbourne.

Since the release of *Melbourne 2030* in 2002, there has been an element of consistent policy and strategy direction and implementation effort across metropolitan and regional development that is now beginning to deliver noticeable results. Development of a polycentric city, green wedge management, and urban growth boundary protection are a few matters that have been maintained but evolved over the last 20 years.

It is important that any new metropolitan and regional strategy builds on the strengths of past policy and strategic intent and adjusts where necessary to address emerging challenges and opportunities. This will provide the necessary certainty in land use planning to continue to foster stability, efficient resource allocation, promotion of responsible development, protection of the environment, and positive contribution to the overall well-being of communities.

Of particular focus are the principles which Plan Melbourne was founded on, which remain relevant and sound to this day. Any new plan should seek to build and enhance these principles to make them relevant for today and the planning period ahead.

Confirm commitment to the Urban Growth Boundary

Since its inception, there have been a range of changes to expand the Urban Growth Boundary (UGB) creating uncertainty and raising expectations for land holders. This speculation is counterproductive in achieving a more compact city which lies at the heart of its inclusion.

In Brimbank, commercially viable farming operations have become much more limited – further impacted by poor soils, poor land management practices, limited water allocation and urban pressures at the edges of green wedges. Melbourne Airport safeguarding also impacts how land can be used.

There is a need for a clear and consistent message to be conveyed regarding the future of the UGB and the State Government needs to put in legislative change and other supports to ensure the importance of all green wedges is recognised and that they are productively used.

Ensure that an implementation, monitoring and review program is established that includes local government.

Many iterations of metropolitan strategies have been well developed but have been let down by poor implementation commitment overtime. In Plan Melbourne Refresh, there were over 100 actions that appeared ambitious and difficult to achieve without significant effort and focus of attention.

In developing a new plan an integrated, long-term approach continues to be needed with a clear program to monitor and review progress that involves local government. In progressing any new plan, Council would encourage any actions to be focused and targeted in number to ensure they are meaningful and can be effectively delivered.

RECOMMENDATIONS

1. Review and bring forward past relevant Plan Melbourne and other planning policies and objectives and build on and refine where necessary.
2. Confirm the local and ongoing support for an Urban Growth Boundary to continue to encourage a compact city.
3. Financially support local government to undertake and implement green wedge management plans and implementation of revised planning provisions.
4. Develop an implementation plan that integrates and aligns State Government investment with the priorities and timelines identified in Plan for Victoria.
5. Ensure that all stakeholders responsible for delivery are appropriately consulted, funded and supported.
6. Establish an effective monitoring and review framework that is transparent and accountable overtime.