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				<p>New action is needed to implement strategy 2.2 and should be a high priority action.</p> <p>New action is required to implement design principles for all public spaces, streets and adjacent developments that support community inclusion (access for all) to support DDA access to premises.</p> <p>New action is needed to support accelerated program of making all public transport accessible.</p> <p>Equal access needed within public buildings and commercial buildings, the public realm outside buildings, structural requirements for housing which can be adapted for accessible housing at relatively low cost, accessibility around outside of house and from property boundary to dwelling entries, rental properties being suitable for all tenants and an effective mainstream complaints resolution body and process.</p>	2.2 2.3 3.1	<p>It is considered that actions 2.2.1-2.2.12 adequately implement the strategies outlined in section in 2.2 relating to housing affordability. No change required to address this comment.</p> <p>Action 2.3.1 amended to refer to community inclusion and access. Action 2.3.2 amended to address the principles of the DDA.</p> <p>This comment is addressed in part by action 3.1.3 which is a short term priority action. Making public transport accessible is beyond the scope of the Statement and is addressed by "Linking Melbourne: Metropolitan Transport Plan". No change required to address this comment.</p> <p>Issues of disability access are addressed in part in this statement. Introducing regulation to make all new housing visitable/adaptable/accessible is a state-wide and national issue which is beyond the scope of this Statement. No change required to address this comment.</p>
4	Trevor Jackson (Housing Resource & Support Service Inc)	Qualified support		<p>Draft Statement doesn't adequately address the need to support the diverse, sustainable communities wishing to live or currently living in the Inner Region.</p> <p>Residents with a disability must also be included in this Statement.</p> <p>Strategy (2) in 2.1 needs to be changed to provide for not just promote adaptable and flexible dwellings.</p> <p>All new housing should be made adaptable and visitable for children, the aged and people with disabilities.</p> <p>The needs of people with disabilities should be considered by both the private and the public housing sector.</p> <p>Housing affordability must be given equal consideration in planning and development in the Inner Region.</p>	1.1 2.1 2.1 2.1 2.1 2.1	<p>Theme 2 relates to supporting diverse sustainable communities through meeting a wide range of housing needs now and in the future. No change required to address this comment.</p> <p>Section 2.1 addresses the issue of housing diversity and adaptability. Action 2.1.7 supports the introduction of standards for accessible housing with visitable housing set as a minimum standard for all new dwellings. No change required to address this comment.</p> <p>As IRHWG member Councils do not have responsibility for providing housing, it is more appropriate that the wording remains as promote. No change required to address this comment.</p> <p>This comment is addressed in part through Strategy 2.1. Action 2.1.7 supports the introduction of standards for accessible housing with visitable housing set as a minimum standard for all new dwellings. A new action has also been included (action 2.1.6) to undertake research on the need for accessible and adaptable housing within the region. No change required to address this comment.</p> <p>A number of strategies and actions address the needs of people with disabilities within both the private and the public housing sector. Strategy 2.1 aims to provide an increase in accessible housing, including actions 2.1.7, 2.1.8 and 2.1.9. A new action has also been included (action 2.1.6) to undertake research on the need for accessible and adaptable housing within the region. No change required to address this comment.</p> <p>This Statement contains a series of actions regarding housing affordability and aims to balance the economic /financial viability of the region with social/ environmental/ neighbourhood character. No change required to address this comment.</p>
5	Elizabeth Raut Royal Australian Institute of Architects	Qualified support	Supports the vision of the IRHS, actions in Chapter 6 and involvement of the public sector in the housing development industry.	<p>Interested in development of public funding to achieve objectives and private sector incentives and associated planning policy mechanisms for affordable housing.</p> <p>Amend Actions 1.1.5, 1.1.7, 1.1.8, 1.1.9, 2.1.5, 2.2.1, 2.2.11, 2.3.5 to include RAIA as a project partner.</p>	2.2 1.1, 2.1, 2.2, 2.3	<p>The actions in section 2.2 aim to explore funding models for the provision of social and affordable housing and advocate for the introduction of planning mechanisms to achieve private sector contributions for affordable housing. No change required to address this comment.</p> <p>The RAIA can be involved in the implementation of this action. However, it would not be appropriate for RAIA to be listed in the IRHS as a Partner, as listed partners are expected to have responsibility and capacity for implementing actions. No change required to address this comment.</p>
6	Julie Hyde Department of Education and Training	Qualified support	The submission supports the statement. The submitter, DET, would like to be involved in the implementation of the Statement.	<p>Encourage strengthening partnerships with local councils and governments agencies given the difficulties in identifying suitable land parcels for the development of schools.</p> <p>Local information regarding redevelopment sites should be shown on a map.</p> <p>Change action 3.1.1, 3.1.4 and 3.1.5 to include DET as a project partner.</p>	3.1 3.1	<p>Throughout the Statement the importance of partnerships is recognised. Action 3.1.1 aims to identify priorities for social infrastructure provision (including education facilities) at the regional level. This action would enable Councils and Government agencies to work together and strengthen partnerships. No change required to address this comment.</p> <p>It is not the purpose of the IRHS to identify individual redevelopment sites. This level of detail is more appropriate in local planning. No change required to address this comment.</p> <p>Action 3.1.1 amended to add DET as a project partner.</p>

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7	Heidi Dixon VicUrban	Qualified support	Supports action 1.1.8 in principle. Early involvement of VicUrban is needed in implementation.	<p>Rewrite/edit document consistent with the style of IMAP.</p> <p>Vision statement could be rephrased into a set of principles (suggested list).</p> <p>Housing affordability strategies and actions should be strengthened to emphasise partnerships with Housing Associations.</p> <p>Increasing awareness of options for the delivery of affordable housing could be achieved through the inclusion of case study material in the Statement (egs provided).</p> <p>Governance of the IRHWG needs to be fully articulated.</p> <p>Actions need to be reduced in number, strengthened in terms of expected outputs, and be agreed to by project partners.</p> <p>Clearer definition is needed on VicUrban's role.</p> <p>VicUrban's abilities to assist preparing a site for development is no different to that of other developers.</p> <p>Definition is needed on the term 'larger scale residential development'.</p> <p>Support Action 1.1.8 in principle with early involvement of Vic Urban.</p> <p>IRHS should encourage Councils to identify strategic development sites for housing.</p> <p>IRHS should prioritise early involvement of development partners such as VicUrban in the planning of strategic redevelopment sites for housing.</p>	<p>2.2</p> <p>2.2</p> <p>1.1</p> <p>1.1</p> <p>1.1</p>	<p>No change required to address this comment.</p> <p>Vision Statement amended to include: "Facilitate access to a diverse range of housing, including affordable housing, that will meet the needs of current and future residents."</p> <p>Action 2.2.5 has been amended to read "establishing partnerships with social and affordable housing providers...".</p> <p>Actions 2.2.5 addresses the development of best practice models for the provision of social and affordable housing. No change required to address this comment.</p> <p>An examination of broader governance structures for local government in the Inner Region is beyond the scope of the IRHS. However, there is potential for IRHS actions to be delivered under the regional governance structures established to implement IMAP. No change required to address this comment.</p> <p>No change required to address this comment.</p> <p>Statement changed to clarify VicUrban's role (ie, to ensure that the actions they are partners in are consistent with their charter).</p> <p>Statement changed to clarify VicUrban's role (ie, to ensure that the actions they are partners in are consistent with their charter).</p> <p>It is not considered that a definition for the term 'larger scale residential development' is required. No change required to address this comment.</p> <p>VicUrban has been removed as a partner from this action as its role in redevelopment is considered to be no different from other developers. No change required to address this comment.</p> <p>Councils have commenced identifying strategic redevelopment sites for housing as part of developing the Inner RHS. Further opportunities for housing will be identified through the preparation or review of local housing strategies or activity centre structure planning. The DSE's Urban Development Program identifies strategic development sites. No change required to address this comment.</p> <p>Planning for specific redevelopment sites is a local rather than regional issue. No change required to address this comment.</p>
8	John Beckwith (Yarra City Activity Centres Business Forum)	Objection		<p>Concern that there will be compulsory land acquisitions to accommodate new housing.</p> <p>Questions whether forecasts in Table 6, will be the limit of development.</p> <p>Considers that new social housing provided by the Office of Housing should be accommodated in the cities of Port Phillip and Stonnington which are in a better financial position than the City of Yarra to withstand the loss of rating revenue.</p> <p>Additional State Government funding will be required to provide for additional and improved quality public transport infrastructure and services for new residents.</p> <p>Concern that multi-unit developments are approved without family or visitor parking.</p> <p>Population growth will require two additional police stations and additional resourcing of SES, additional hospitals and other agencies, additional pre-school, primary school and secondary school services and an upgrade in water supply and waste water treatment.</p> <p>Development contributions may be insufficient to meet needs of new and upgraded infrastructure.</p>	<p>2.2</p> <p>3.1</p> <p>3.1</p>	<p>Compulsory land acquisition is beyond the scope of this Statement. The issue of any land acquisition for housing (compulsory or otherwise) would need to be addressed by each local Council. No change required to address this comment.</p> <p>The IRHS plans for housing growth and change over a 30 year period. Future planning for housing growth and change will be needed beyond 2030 to provide for the needs of the Inner Region's current and future residents. No change required to address this comment.</p> <p>Section 2.2 seeks to achieve an increased supply of well located affordable and social housing across the region. Implementation of actions within this section will identify locations across the region where more affordable housing is needed. No change required to address this comment.</p> <p>Action 3.1.3 relates to working collaboratively with the State Government to achieve priority transport infrastructure and service improvements to support residential growth. No change required to address this comment.</p> <p>Addressing the parking requirements for specific residential development is beyond the scope of this Statement. No change required to address this comment.</p> <p>Section 3.1 includes objectives to resource the timely provision of social and physical infrastructure to support population growth and change. Action 3.1.1 will identify priorities for regional social infrastructure. Other local infrastructure required to support housing growth will need to be planned for by Councils within the Inner Region, in association with service and infrastructure providers. No change required to address this comment.</p> <p>Action 3.1.4 aims to achieve more effective development contributions for physical and community infrastructure. It is recognised that other funding mechanisms may be needed to meet the needs of new and upgraded infrastructure. No change required to address this comment.</p>

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				<p>Retail goods are not in close proximity to residents, particularly social housing tenants.</p> <p>Rental costs are constantly rising for low income groups.</p> <p>Housing for low income groups needs to be supported by a good contract from the State Government.</p>		<p>Planning for housing in locations close to retail opportunities should be undertaken by Councils as part of preparing or reviewing local housing strategies and activity centre structure plans. No change required to address this comment.</p> <p>Section 2.2 aims to expand the supply of affordable housing for low income Victorians through a series of policy, financial and organisational mechanisms. No change required to address this comment.</p> <p>Section 2.2 includes actions that work towards strengthening government assistance for affordable housing. No change required to address this comment.</p>
9	Peter Matthews (Residents 3000)		<p>IRHS generally provides a good forward plan. Support for Section 26 (sic) Special Committee as a governance model. Support provision of more affordable housing.</p>	<p>IMAP, Inner Regional Housing Statement and Draft Council Plan should be integrated.</p> <p>Examination of broader governance structures for local government in inner Melbourne is needed.</p> <p>Consider more social support, community support and recreational/sport are needed.</p> <p>Emergency accommodation for the homeless appears inadequate.</p>	2.3	<p>While these documents have been prepared by different agencies for different purposes, the housing elements of IMAP and the Inner Regional Housing Statement are integrated. No change required to address this comment.</p> <p>An examination of broader governance structures for local government in the Inner Region is beyond the scope of the IRHS. However, there is potential for IRHS actions to be delivered under the regional governance structures established to implement IMAP. No change required to address this comment.</p> <p>Section 3.1 adequately addresses the need for community and social infrastructure. It is beyond the scope of the Statement to provide social and community support services. No change required to address this comment.</p> <p>A strategy under 2.2 supports the ongoing role of the Inner Region in producing a range of opportunities for a range of affordable housing, including crisis accommodation. Action 2.2.10 relates to building capacity of housing associations to deliver and manage affordable housing, and action 2.2.4 relates to exploring new funding models for the provision of affordable housing. No change required to address this comment.</p>
10	Malcolm Johnson (DOI)	Qualified support		<p>Car parking provisions should be unbundled from development for reasons of affordability, to suit both young and ageing.</p> <p>IRHS should recognise Integrated Transport Plans (ITPs) and to include the requirement for ITPs.</p> <p>Improved amenity and public realm and better built outcomes should be emphasised. In particular, pedestrian permeability is essential as a key requirement for viable and efficient public transport.</p> <p>IRHS treats all areas as 'one size fits' all and different approaches should be included for different areas.</p> <p>Retail mix should be retained to fulfil ongoing daily living needs of both young and old.</p> <p>The process for identifying opportunities and addressing them needs to be outlined.</p> <p>Needs discussion of sustainable transport provision. Parking requirements need to be linked to strategic outcomes outlined in an Integrated Transport Plan including maximum parking requirements.</p> <p>The access and transport requirements of an ageing population need to be provided for.</p> <p>Reduced levels of growth in established areas are not converse to activity centre growth but are concurrent.</p> <p>The links to and best use of the PPTN and existing transport infrastructure needs to be emphasised. A process is needed to identify the different needs and the changes that are possible rather than one size fits all.</p> <p>Lack of recognition of excess capacity in public transport network.</p> <p>Pedestrian connectivity to destinations via pedestrian and cycle network. The link to public open space providing this network is not made.</p>	2.3	<p>Changes to car parking provisions are beyond the scope of the Statement. No change required to address this comment.</p> <p>Integrated Transport Plans are beyond the scope of the Statement. ITPs could be considered as part of structure planning for activity centres and strategic redevelopment sites. No change required to address this comment.</p> <p>Actions in Chapter 6 relate to the preparation of structure plans for Principal and Major Activity Centres which can address issues relating to pedestrian permeability. Action 2.3.1 has been amended to include facilitating pedestrian permeability in local policies.</p> <p>Different approaches are included for strategic redevelopment sites and dispersed residential locations. Local planning will also provide tailored solutions to specific local housing issues. No change required to address this comment.</p> <p>Action 2.3.1 seeks to facilitate active street frontages and a mix of functions at street level. It is expected that this will include retaining retail mix that meets the needs of all residents. No change required to address this comment.</p> <p>Themes in the Executive Summary are expanded on in Chapter 5. No change required to address this comment.</p> <p>Text on page 48 has been amended to discuss the provision of sustainable transport. Parking requirements are beyond the scope of the Statement.</p> <p>The text on page 47 has been amended to identify the need for access and transport for the ageing population.</p> <p>The Inner Region's approach to achieving reduced levels of growth in established areas is articulated in the IRHS. No change required to address this comment.</p> <p>Consideration of the best use of the PPTN and existing transport infrastructure is beyond the scope of the Statement. No change required to address this comment.</p> <p>Chapter 5 has been amended to acknowledge the challenge of encouraging full utilisation of the public transport network and support further investigation into opportunities to maximise its use.</p> <p>Chapter 5 has been amended to include the role of open space in providing pedestrian connectivity to destinations including activity centres, housing and the PPTN, and the reliance of an efficient and sustainable public transport network on good pedestrian access.</p>

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				<p>The strategies indicate the need to identify areas for intensified housing but the process is not evident.</p> <p>Urban Design Unit</p> <p>Urban Design Unit</p> <p>SEAV</p> <p>Vic Track, DOI</p> <p>The links to Integrated Transport Strategies and include DOI.</p>	<p>1.1</p> <p>2.1</p> <p>2.1</p> <p>2.1</p> <p>2.2</p> <p>2.3</p>	<p>Areas suitable for higher intensity housing will be identified through Actions 1.1.1, and 1.1.3. No change required to address this comment.</p> <p>This action will involve consultation with the DSE Urban Design Unit. No change required to address this comment.</p> <p>This action will involve consultation with the DSE Urban Design Unit. No change required to address this comment.</p> <p>SEAV have made a separate submission to the Statement and have indicated where they believe they should be involved as partners. No change required to address this comment.</p> <p>Action 2.2.7 refers to working with relevant government agencies. No change required to address this comment.</p> <p>Councils in the Inner Region should consider the need for and linkages to integrated transport strategies as part of local planning for strategic redevelopment sites and activity centre structure planning. No change required to address this comment.</p>
				<p>Establish a partnership with DOI to deliver medium to long run outcomes (infrastructure).</p> <p>All infrastructure providers need to be involved in Action 3.1.3</p>	<p>3.1</p> <p>3.1</p>	<p>Action 3.1.4 has been amended to refer to development of regional development contribution policies and levies for key physical and community infrastructure and projects.</p> <p>Action 3.1.4 has been amended to include infrastructure providers in partner organisations.</p>
11	Stephen Hare (National Trust)	Qualified support	<p>Support conclusions regarding directing large scale growth away from traditional shopping strips and historic housing areas, modifying Melbourne 2030 to suit character and conditions of inner city areas, directing the bulk of residential growth to the CBD, Docklands, Southbank and large redevelopment sites, recognising the special character of retail strips, mixed use areas adjacent to retail strips often have heritage and amenity issues, established residential areas should only accommodate modest growth.</p>	<p>Too few actions are proposed to achieve the strategy of directing development away from established residential areas dominated by historic housing stock and towards existing high rise areas and large sites.</p> <p>Opportunity to promote consistency across the inner suburbs is possible as the cities of Yarra and Melbourne are reviewing their heritage controls currently.</p> <p>Consideration should be given to the extension of the relatively small areas currently protected in formal Heritage Overlay precincts in areas such as the Richmond and Collingwood flats and South Yarra.</p>	<p>1.1</p>	<p>A range of actions in Theme 1 are proposed to achieve the strategy of directing development away from established residential areas and towards the CAD, Docklands and strategic redevelopment sites. No change required to address this comment.</p> <p>Reviews of heritage controls are a matter for each municipality to consider rather than a regional issue to be addressed through the Inner Regional Housing Statement. No change required to address this comment.</p> <p>Extension of heritage overlays are a matter for each municipality to consider rather than a regional issue to be addressed through the Inner Regional Housing Statement. No change required to address this comment.</p>