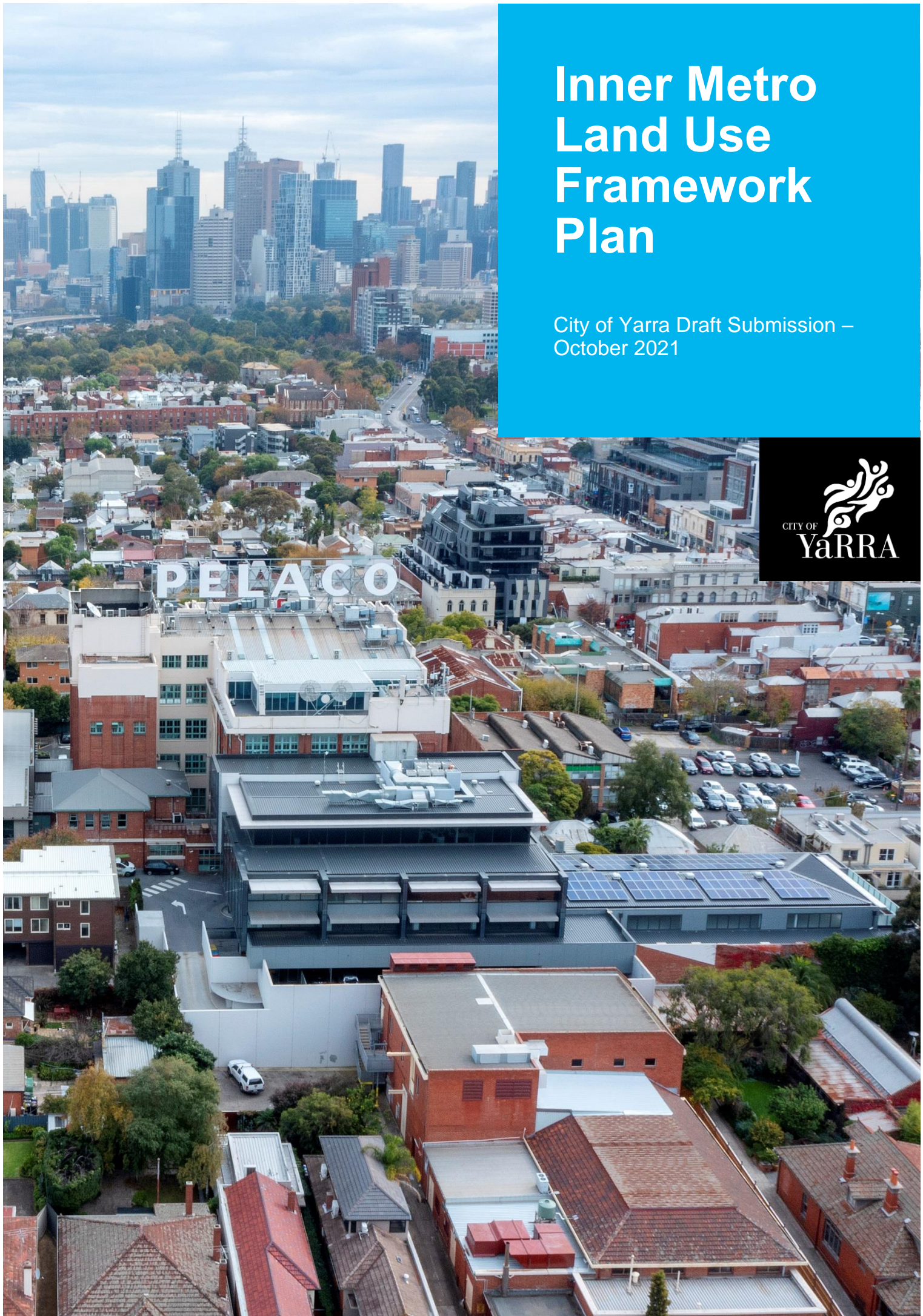


Inner Metro Land Use Framework Plan

City of Yarra Draft Submission –
October 2021



PELACO



Executive summary

The City of Yarra welcomes the opportunity to comment on the *Inner Metro Land Use Framework Plan* (LUFP).

The development of a comprehensive, long term inner metropolitan regional plan is crucial to maintaining and enhancing the sustainability and liveability of inner Melbourne.

Council notes that *Inner Metro Land Use Framework Plan* is not intended to be a comprehensive re-write of *Plan Melbourne* but instead adds a layer of detail at the regional level.

Support for Key Directions and Strategies

Yarra considers the LUFP an important strategic document which will help provide a strong framework for Inner Melbourne. The development of regional strategies and maps identifying employment and housing opportunities and transport improvements are strongly supported.

Overall the directions and strategies in the LUFP generally align with the Community Vision, Council Plan, planning policy framework and other adopted strategies of Council.

The plan generally reflects the key elements that differentiate the Inner Region from other regions, such as heritage high streets; key natural features and icons; the Yarra River; key regional active and passive spaces (such as the Capital City Trail); the distinctive built form character; the complex mix of land uses; and evolving neighbourhoods, including places that attract creative industries and start-ups.

However, this submission does identify key elements that do not align or where they could go further. It also suggests a range of additional actions that could be pursued across the Inner Metro Region to help successfully implement the plan.

Key Considerations for Yarra

The following are strategic considerations in this submission which sit across the six themes. They are considered priorities for Council and are critical for the successful delivery of *Inner Metro Region Land Use Framework Plan*.

1. Delivering well-located housing

Yarra acknowledges that the city will continue to play an important role in accommodating future housing growth, but that this must be balanced with maintaining Yarra's neighbourhood and heritage character, and important employment areas.

The LUFP seeks to define where new housing should be located across the Inner Region. The proposed inclusion of locations which may accommodate population growth is supported.

However, to maximise access to shops, services and public transport, the LUFP identifies a walkable catchment of 800 metres around the Major and Neighbourhood Activity Centres. This catchment approach is not supported.

Council has an adopted Housing Strategy which clearly identifies preferred locations for growth and applies a more nuanced approach. This approach has taken the extensive areas of heritage significance which abut many activity centres, broad public transport coverage across the municipality, and physical and strategic context of sites into account when determining the scale and intensity of housing which can be accommodated. Council's extensive capacity work identifies that Yarra can accommodate its projected growth. The identification of 800m catchment would undermine this targeted approach.

An additional challenge in planning for growth is the need to accommodate new development in a built form that is sensitive to the context of the area which includes heritage significance, character and scale of the surrounding area. This needs to be balanced with opportunities to allow for new built form character in other areas. If not carefully managed, future development could erode Yarra's valued character. This submission suggests additional strategies to address this.

2. Focus on social and affordable housing

Housing affordability is a key issue for Yarra. Maintaining the diversity of the municipality is critical and Council is committed to pursuing strategies that increase social and affordable housing in the municipality.

The plan recognises there is an insufficient supply of affordable housing in the Inner Metro Region and the housing prices are exceptionally higher than other metro regions. It includes directions and strategies to *'increase the supply of social and affordable housing'* and *'provide greater choice and diversity of housing in the Inner Metro Region'*.

The directions and strategies within the plan are strongly supported but lack specifics and actions.

Council continues to support the introduction of planning mechanisms such as inclusionary zoning into the Victoria Planning Provisions. Inclusionary zoning is a requirement for developers to supply a proportion of new developments as affordable housing.

The plan should also address quality and ensure that development is 'tenure blind'. Affordable housing and private dwellings should not be able to be readily differentiated through their appearance, quality or amenity. Affordable housing should include high standards of accessibility and be durable and energy efficient.

Council also seeks to ensure community benefit from any renewal of public housing is maximised.

3. A balance of housing and employment growth

A key challenge for the inner city is the ongoing need to balance housing development with employment uses.

The plan generally recognises the need for this balance particularly in the document's Strengths and Challenges sections of each theme. However, the structure of the document means that the housing and employment issues are dealt with separately.

The plan provides a strong focus on housing growth and embeds the *Victoria in Future 2019* population and dwelling projections.

In terms of employment growth, the LUPF:

- supports employment in the Inner Region by supporting the role of the two employment / enterprise precincts – Cremorne and Gipps Street (Collingwood)
- identifies the multi-faceted roles of major activity centres
- supports the employment role of the Abbotsford Industrial Precinct
- identifies the Inner Region as a location for sport, arts, culture and entertainment.

Council supports these strategies and directions but identifies some of the challenges in relation to workplace affordability and ensuring enterprise precincts promote quality development, provide attractive environments for businesses and workers, infrastructure and ease of access such as by public transport.

Council also supports the retention of industrial precincts but identifies the need for a methodology to consider alternative uses in the future should things change for example the departure of a major industry.

4. Revitalising activity centres

Yarra is home to a series of vibrant and evolving activity centres. Each centre in Yarra is unique and dynamic, with a business and land use mix that is continually changing.

The LUPF recognises the value of and variety of activity centres in the inner city – including their role in employment and housing, providing important community spaces and focuses for the community and transport interchanges.

While it recognises the changing retail sector and emerging retail vacancies in the region are key issues, the plan offers an opportunity to do more at the regional level to address this issue. One example is the consideration of nimble planning controls support change of uses in activity centres to bring creatives industries and other industries back to activity centres to bring life to the precincts.

Council notes Action 6 which proposes to ‘Apply the Movement and Place Framework to the Inner Metro Region’s arterial road network and allocate priorities for transport connector improvements such as improving road space allocation for public and active transport, identify priority streets for walking and cycling, and road management and use arrangements. This should include a focus on transport interchanges and transport corridors.’ This approach is strongly supported in Yarra’s activity centres but would require funding and a strong commitment from State Government.

5. Retaining Yarra’s diversity and distinctiveness

Yarra strongly support the recognition of the unique character and identity of the inner city as a key element of the city’s liveability for residents and businesses and attraction for visitors in the LUPF.

The LUPF identifies that as urban development intensifies, a high quality public realm, and expanded and better connected public open spaces will be crucial to ensure liveability is maintained. The plan includes a number of strategies in relation to public open space which are strongly supported but further specific actions are needed in relation to public open space provision to support these strategies.

The diversity and distinctiveness of neighbourhoods and places across Yarra are an inherent part of its character and attraction. Importantly this creates a strong sense of place for local communities and this diversity of place must be retained. Some strengthening of this aspect of the LUPF is suggested in this submission.

6. Raising standards for environment and sustainability

To better manage increasing pressures on natural resources, higher levels of population growth, and the effects of climate change, there is a need to improve how environmental sustainability is incorporated into how the built environment is designed and planned.

Yarra has long advocated for stronger environmentally sustainable design controls in the planning and building process and has adopted its *Climate Emergency Plan* as a call to action.

The focus throughout the LUPF on sustainability and resilience is welcomed. The LUPF includes directions and strategies addressing urban heat, tree canopy cover and integrated water management.

However, the plan should be much stronger on commitments to a zero emissions built environment.

For the Victorian Government to meet its target of net-zero emissions by 2050, it needs to be clear that land-use planning to enable a zero-emissions built environment is a key part of achieving that target.

It would be useful to communicate the connection between the sustainability and climate change related measures in the LUPF with those in the recently released ESD Roadmap, *Built Environment Adaptation Action Plan*, along with the work underway by local councils through the Elevating ESD Targets project.

In addition, it is suggested the LUPF address other sustainability issues such as the circular economy and future gas usage.

7. Implementation

New provisions in the planning scheme

The LUPF identifies that the plan will be largely implemented through the planning scheme.

Careful consideration is required as to how the plan’s directions and strategies will translate into planning policy and inform decision making. It is also important the maps are accurate and clearly assist decision making.

Other actions

A number of short to medium term actions are included in the Inner Metro Region LUPF. The five- year action program summarises these actions to be delivered collaboratively by the State Government and councils in the Inner Metro Region.

Yarra strongly supports this on-going collaborative approach. Local councils in the Inner Metro Region are already working together to address priority issues for their region and with the State Government such as through the Inner Metropolitan Partnership and the M9 group of Councils.

Many of the directions and strategies in the plan will be implemented outside the planning scheme. Successful implementation of the plan will be dependent upon improved cross-government commitment

and co-ordination. The LUPP must be clear on how its strategies will be implemented – at local, regional or State levels. There needs to be more clarity around funding, timing and responsibility.

Given the breadth of the issues covered in the document, the LUPP has a small number of actions. This submission suggests a range of additional actions that could be pursued across the inner metro region to help successfully implement the plan. These include ongoing monitoring, research and data gathering and funding.

The LUPP identifies there are many actions under *Plan Melbourne* and other government programs and initiatives, such as the Metropolitan Partnerships, that will contribute to improving planning outcomes in the Inner Metro Region. However, it does not list these actions, leaving the impression there are gaps in the document.

Cross referencing actions in other documents or projects being undertaken by the Inner City Partnership would assist in understanding how aspects of the plan are being implemented.

1.0 Introduction

The City of Yarra welcomes the opportunity to comment on the *Inner Metro Land Use Framework Plan* (LUFP).

The development of a comprehensive, long term inner metropolitan regional plan is crucial to maintaining and enhancing the sustainability and liveability of inner Melbourne.

Council notes that *Inner Metro Land Use Framework Plan* is not intended to be a comprehensive re-write of *Plan Melbourne* but instead adds a layer of detail at the regional level.

Council reiterates its support for the key directions and strategies underpinning the Plan.

1.1 Approach of Council's submission

This submission provides both high-level and detailed comments, important in progressing the LUFP.

Yarra has only commented on parts of the LUFP relevant to the LGA. For example, no comments are provided on directions or strategies which only address the central city.

Yarra's submission focusses on seven plan's chapters:

- Productivity (jobs and investments)
- Housing choice
- Integrated transport
- Liveability
- Strong communities
- Sustainability and resilience
- Implementation.

Under each these headings, this submission outlines:

- The key directions, strategies and actions proposed in the Plan relevant to Yarra
- Considerations for Yarra – an outline of Council's broad position on each direction and its strategies
- Any changes sought by Council, including any gaps in the strategies or actions which have been identified.

Appendix 1 contains detailed comments on the maps, tables and other figures in the LUFP.

2.0 Productivity

Yarra's employment precincts and activity centres are critical economic areas that support a broad range of business and employment uses. The availability of areas of employment land in Yarra is a strength and competitive advantage and will be important in accommodating future business and employment growth.

Yarra's competitive strength as a knowledge economy is based on a clear clustering of areas where research institutions, health and education facilities, high-tech, innovative and creative firms combine to attract leading businesses, entrepreneurs and professionals.

In addition, Yarra's activity centres and areas zoned for industrial purposes that present further opportunities for additional capacity for commercial development and employment. Yarra also has an established and leading role within Victoria's creative arts industry.

2.1 Sport, arts, culture and entertainment

DIRECTION 2. Strengthen the Inner Metro Region as a local and international destination for sport, arts, culture and entertainment to attract investment and visitors

STRATEGY 5. Grow the visitor economy, night-time economy, sport and entertainment uses, and uses in the creative sector that contribute to local and international tourism in the Inner Metro Region.

STRATEGY 6. Retain existing entertainment and cultural activity spaces in the region and encourage a diversity of complementary uses to ensure the provision of venues serve industry and community needs.

STRATEGY 7. Provide affordable spaces for cultural production and performance to support the local creative and cultural industry and to attract and host international touring creatives.

Direction 2 and Strategies 5, 6 and 7 are supported.

The direction and strategies align with Council's *Economic Development Strategy*. Yarra's appeal as a destination is linked to the municipality's product strengths in the arts, hospitality, shopping, music, night-life and events. It will be important for the LUPF to reinforce the attributes that contribute to Yarra's popularity as a unique place for tourists and non-locals to visit.

Yarra has long been recognised as a creative, inclusive and sustainable municipality. Creative industries generally relate to art and cultural activities across a range of disciplines including visual arts, music, theatre, performance, literature, public art, design, fashion, filmmaking and craft.

The identification of the need for affordable spaces for production is strongly supported. There is a growing threat of unaffordability in Yarra, including rising property prices and rents for working artists, creatives and makers to live and occupy spaces and studios. (See comments below in Actions.)

2.2 Activity Centres

DIRECTION 4. Enhance the Inner Metro Region's vibrant and diverse activity centres and their contribution to the identity of the region

STRATEGY 13. Ensure the region's activity centres provide adequate jobs, services and opportunities for recreation and entertainment to service workers and visitors from across metropolitan Melbourne.

STRATEGY 14. Retain existing commercial zoned land and identify areas that can support future demand for commercial floorspace and new investment with a focus on major activity centres and major urban renewal areas.

STRATEGY 15. Encourage a diversity of employment uses in major activity centres and facilitate the provision of key services to complement other employment precincts within the Inner Metro Region.

Direction 4 does not specifically relate to productivity or employment but is strongly supported.

Yarra is home to a series of vibrant and evolving activity centres. Each centre in Yarra is unique and dynamic, with a business and land use mix that is continually changing.

The LUPF recognises the value of and variety of activity centres in the inner city – including their role in employment and housing, providing important community spaces and focuses for the community and transport interchanges.

However, a key challenge for the inner city is the ongoing need to balance housing development with employment uses. The plan generally recognises the need for this balance particularly in the document's Strengths and Challenges sections of each theme. However, the structure of the document means that the housing and employment issues are dealt with separately. This is particularly the case in relation to activity centres.

Strategy 14 is supported however this strategy must also recognise that activity centres provide for housing opportunities, as put forward in *Plan Melbourne* and Chapter 5, Housing Choice. Their role in housing is a key feature and something Yarra relies upon.

Both Yarra's *Housing Strategy (2018)* and *Spatial Economic and Employment Strategy (2018)* (and strategies in the *Yarra Planning Scheme – Rewrite of local policies – Amendment C269*) identify Yarra's activity centres as appropriate locations for new housing and employment.

The SEES highlights the importance of identifying locations for housing that compliment (rather than disrupt) employment activity (e.g. activity centres, mixed use areas and dispersed infill in residential areas). It also recognises that demonstrating sufficient capacity to accommodate housing demand in these locations will reduce pressures for ad-hoc conversion of employment lands to residential.

Council's Housing Strategy (adopted simultaneously with the SEES) seeks to direct new housing to areas within or close to activity areas that have good access to public transport, open space, and other services and limit housing growth in established residential areas. It indicates that activity centres, alone, can supply approximately 14,300 dwellings by 2031.¹

The SEES found that Yarra's activity centres², even with substantial residential development, are likely to accommodate significant growth in retail, commercial and institutional floor space. It is anticipated that an estimated 134,000 sqm of additional floor space will be added to Yarra's larger activity centres between 2016 and 2031 for commercial, retail and institutional uses (an increase of around 10%).³

2.3 Industrial and Employment Precincts

DIRECTION 5. Retain existing and support emerging employment areas, including industrial and enterprise precincts, across the Inner Metro Region

STRATEGY 16. Support the development of enterprise precincts in Cremorne, South Melbourne, Arden and Collingwood and encourage their continued development as key locations for creative industry uses.

STRATEGY 17. Maintain a variety of uses and lot sizes in enterprise precincts to retain commercial affordability for start-ups and small businesses and ensure the agglomeration of complementary uses.

STRATEGY 18. Retain regionally-significant industrial land by managing encroachment by other uses that would cause fragmentation and may compromise the development and efficient operation of existing businesses.

STRATEGY 19. Identify and plan for areas that can support future demand for employment uses and new investment.

Yarra supports Direction 5 and Strategy 16 and 19.

The strategies around the Gipps Street Precinct and Cremorne Precinct are supported. These precincts include a diverse mix of offices, creative industries and specialised manufacturing businesses. Their

¹ Yarra Housing Strategy (page 64)

² Noting this is based on entire activity centres, not solely land in the Commercial 1 Zone.

³ The SEES assumed two floors of employment space in the Commercial 1 Zone except in the Botanica Office Park where 4 storeys were assumed. In the MUZ, 0.5-1 floor of employment space was assumed.

proximity to the CBD, other parts of the inner Melbourne and good access to Melbourne's transport network makes them attractive for businesses seeking a location close to workers, customers, clients and other firms.

Affordability in enterprise precincts

In terms of Strategy 17, Yarra recognises that affordability is an important factor in maintaining diversity, vibrancy and creativity in enterprise precincts, all of which are critical drivers of innovation. However, lot size alone does not guarantee affordability.

This strategy could consider the factors that drive success in enterprise precincts and attract start-ups and small businesses such as quality of place; accessibility; infrastructure; collaboration; and competitive advantage.

Industrial precincts

Council supports Strategy 18 but notes that although there is no need to reconsider the role of industrial precincts at this time, it will be prudent to consider how alternative uses for these precincts might be determined.

The LUPF could be seen to 'lock up' regionally significant industrial areas with no opportunity to consider a transition to other uses where employment uses are genuinely no longer viable. The Abbotsford Industrial Precinct, identified as a regionally-significant industrial area in the draft plan, is an example of an area which may transition in the longer term.

Yarra's Spatial Economic and Employment Strategy (SEES) notes that as industrial employment continues to decline, demand for industrial zoned land is likely to contract. While the capacity analysis undertaken for the SEES suggests there is no need to reconsider the role of this and other industrial precincts at this time, a trigger to consider a change would be the departure of the major industrial land user (for example, the CUB which occupies around half the area of the Abbotsford Industrial Precinct). The SEES flags that given this, it may be prudent for Council to consider how alternative uses for these precincts might be determined.

Council flagged in its submission to the *Draft Industrial and Commercial Land Use Plan* in December 2019 that detailed guidance could be developed to consider a change of use and the 'tests' that must be met, in circumstances where land is flagged as no long viable for employment uses.

This could potentially address:

- A clear set of expectations for the precincts established early via statements of objectives and intended outcomes.
- Where appropriate, joint planning with the State Government (given its critical role in the planning and infrastructure provision process).
- A requirement for precinct plans and masterplans where sites are of sufficient scale.
- Appropriate 'tests' which must be met to demonstrate net community benefit, including:
 - Maintaining a similar level of employment or economic activity on the site
 - Likely demand for shared infrastructure that might be funded via DCPs
 - The potential for a proportion of social and affordable housing to be provided via value capture or inclusionary zoning mechanisms
 - The need for education or other social infrastructure to serve the redeveloped precinct or the wider municipality and regional community
 - Opportunities to provide public infrastructure such as open space and community facilities.

2.4 Quality medium- and higher-density environments

DIRECTION 6. Facilitate well-designed, high amenity and quality medium- and higher-density environments in major urban renewal precincts to provide employment growth

STRATEGY 24. Deliver a high-quality public realm and urban design in major urban renewal precincts, and through the region's employment precincts including activity centres and enterprise precincts.

Council considers that Direction 6 should be expanded and include enterprise precincts as well as activity centres.

Yarra's liveability and vibrancy are seen as the key strengths in attracting creative businesses. The importance of a vibrant and diverse street life; compact, distinctive and authentic neighbourhoods with a diversity of buildings; and pedestrian-friendly public spaces cannot be underestimated.

Yarra's sustainable infrastructure (sustainable transport, green and open space) is an important attractor of creative workers. Maintaining these attributes, whilst also ensuring an availability of office and studio space will facilitate further growth in the sector.

The direction is supported with the inclusion of wording in bold:

*Direction 6. Facilitate well-designed, high amenity and quality medium- and higher-density environments in major urban renewal precincts, **enterprise precincts** and **activity centres** to provide employment growth.*

This makes a connection with Strategy 24. *Deliver a high-quality public realm and urban design in major urban renewal precincts, and through the region's employment precincts including activity centres and enterprise precincts.*

Alternatively, add a similar strategy under Direction 5.

2.5 Actions

ACTION 1. Identify precincts and opportunities where new commercial land can be supplied which can help to accommodate future needs. This may include intensification of commercial uses within existing commercial zoned land, or the rezoning of existing land for commercial uses.

ACTION 2. Implement a program of State Government-led planning projects, in partnership with local government, to ensure metropolitan and major activity centres and urban renewal areas maximise their respective strategic opportunities and contribution within the network of activity centres. Priority will be given to those which deliver significant jobs and housing, leverage investment in state infrastructure, and play an important role in the growth corridor and/or region. State-led planning for these state- and regionally-significant places will contribute to creating liveable communities and achieving more dwellings and jobs in established areas, and identify implementation and coordination actions that support growth and economic investment.

The two actions are generally supported. However, the following additional actions are suggested.

Revitalising activity centres through more nimble planning controls

While the LUPF recognises the changing retail sector and emerging retail vacancies in the region are key issues, officers consider the plan offers an opportunity to do more at the regional level to address this issue. One example is the consideration of nimble planning controls support change of uses in activity centres to bring creatives industries and other industries back to activity centres to bring life to the precincts.

Affordable work spaces / places

The plan must also define 'affordable workplaces' and 'affordability' (e.g. Strategies 7 and 17).

Council supports the concept of affordable workspaces, generally and for the arts. This is consistent with Council's *Economic Development Strategy* and also the Government's own four-year creative industries strategy, *Creative State 2025*.

Already Yarra has an established network of co-working and co-sharing facilities that are responding to the demand for diverse work preferences. In addition, they are helping to address the wider issue of work space affordability for some types of businesses and for start-ups. Affordability can have an impact on the mix of businesses (types and size) in Yarra's employment precincts.

The State Government is undertaking work that is starting to consider this issue and response measures that could be used to retain affordable work spaces. There is opportunity for Yarra to work with the Victorian Government on programs that address the issue of how to retain affordable work spaces. This work should be acknowledged in the LUPF.

2.6 Gaps

Support the actions to ensure the future supply of employment however suggested additional strategies and actions address the following:

- The Productivity Chapter should also reference the importance of regional tourist destinations. For example, the Abbotsford Convent and Collingwood Children's Farm are regional tourist destinations and support cultural and creative industries

Direction 1 applies to the Central City. However, Strategies 3 and 4 included in this direction are also applicable to the rest of the inner metro region. Therefore, the following should be included in other directions:

- *Provide affordable and diverse workspaces to build an innovative and resilient region.*
- *Balance planning for industrial and commercial areas with pressure for ongoing residential development.*

3.0 Housing choice

Yarra acknowledges that we will continue to play an important role in accommodating future housing growth, but that this must be balanced with maintaining Yarra's neighbourhood and heritage character and important employment areas.

3.1 Housing supply

DIRECTION 8. Increase the supply of housing in the Inner Metro Region and ensure housing matches the needs of the growing and changing population

STRATEGY 28. Maximise housing development within the established areas of the Inner Metro Region to achieve the aspirational housing distribution scenario for metropolitan Melbourne.

STRATEGY 30. Increase the supply of medium and higher-density housing in appropriate locations in major activity centres, major urban renewal precincts, urban renewal areas, and in neighbourhood activity centres along tram corridors and serviced by good public transport.

STRATEGY 31. Balance employment uses with residential uses in major urban renewal precincts, major activity centres and large mixed-use developments to achieve a genuine mix of uses in locations identified for both employment uses and medium- and higher density housing.

STRATEGY 32. Support adaptive and innovative approaches in the design of new residential development that respects the heritage and neighbourhood character of the locality

Direction 8 reflects Yarra's approach in the Yarra Housing Strategy that sets a housing growth framework that demonstrates sufficient housing land availability to accommodate projected growth for the next 15 years; and guides and directs future growth in order to meet the changing needs of our community.

Strategy 28 is supported with the replacement of the word 'Maximise' with 'Facilitate'. This recognises that supply of housing does not come at the expense of creating, enhancing or protecting the identity, character and amenity of a place.

Council acknowledges the *Victoria in Future 2019* population and dwelling projections estimate an extra 17,200 additional dwellings will be accommodated in the City of Yarra. Recent Yarra capacity work shows this can be met in growth areas in Yarra's Major and Neighbourhood Activity Centres and major rezoning sites.

Strategies 30, 31 and 32 are supported.

As noted in Productivity, the strategic directions set out in Yarra's *Housing Strategy* and *Spatial Economic and Employment Strategy* identify activity centres as primary locations for economic activity, housing, leisure and recreation, tourism, the arts and culture.

Activity centres are a focus of growth in Yarra and will continue to accommodate most of the city's growth because of their proximity to transport infrastructure, shops and services making them the most suitable locations for development.

Strategy 32 supports Yarra's strategic directions to protect, conserve and enhance the municipality's highly valued heritage places; to retain and promote Yarra's distinctive character and sense of history; and to protect and enhance the built form, character and function of streets and laneways as a feature of Yarra's urban structure and character.

Importantly for the inner region, heritage commercial streetscapes and abutting low rise residential areas means that the scale, intensity and form of additional housing supply in activity centres needs to protect highly intact heritage streetscapes and buildings; be appropriate to its role and capacity; and provide a mix of uses.

3.2 Gaps

A key challenge in planning for growth is the need to accommodate new development in a built form that is sensitive to the context of the area which includes heritage significance, character and scale of the surrounding area. This needs to be balanced with opportunities to allow for new built form character in urban renewal areas. If not carefully managed, future development could erode Yarra's valued character.

Suggest the inclusion of a strategy to:

- *Manage the scale, intensity and form of development in activity centres to protect highly intact heritage streetscapes and buildings and responds to low rise residential neighbourhoods*

A further gap is in relation to the *quality* of the housing proposed – the focus should not only be on the quantity or ‘supply’ as referenced (although this is touched on in Direction 9).

3.3 Housing choice and diversity

DIRECTION 9. Provide greater choice and diversity of housing in the Inner Metro Region

STRATEGY 34. Support alternative and sustainable residential development formats such as co-housing or build-to-rent in appropriate locations, and car free residential development models in locations with good access to alternative transport modes.

STRATEGY 35. Facilitate the development of housing that is adaptable and flexible to cater for changing demographics and can accommodate different household types and configurations over the building’s lifetime

STRATEGY 36. Optimise the opportunities for student accommodation and key worker housing within or close to Carlton-Lygon Street, Fitzroy Smith Street, and Richmond Bridge Road major activity centres and around health and/or education precincts in the Inner Metro Region.

STRATEGY 37. Ensure new residential development is well designed, durable, resilient to climate change and built to a high-quality standard.

STRATEGY 38. Adopt a place-based approach to the delivery of infill housing developments to replace ageing housing stock, ensure a high-quality of design that is appropriate for the local context and contributes to housing supply and diversity.

STRATEGY 39. Recognise the value of mixed housing tenures in the Inner Metro Region and its contribution to greater diversity in local communities.

Direction 9 is supported. Providing a diverse mix of housing options for all residents (including people with disabilities, older persons and families) helps support social inclusion and will maintain Yarra’s vibrant community into the future.

However, Council also notes that any new housing should not come at the expense of creating, enhancing or protecting the identity, character and amenity of a place.

Strategies 33 to 39 reinforce Council’s adopted *Housing Strategy and Affordable Housing and Social Housing Strategy* (2019) and are generally supported. Both strategies seek to plan for more housing choice to support Yarra’s diverse community. See additional comments below.

Different housing formats

Yarra supports and seeks to stay well-informed as to the different models (such as Tiny Houses, Build-to-rent, Rent-to-Buy, Co-housing etc.) for increasing social and affordable housing stock and any implications with regards to their practical application locally.

Student accommodation

Yarra recognises that it is important to ensure that they are designed and built to meet the changing needs of occupants across their lifetime and enhance the liveability of the dwellings for the longer term.

It is recommended that the approach in this strategy could be strengthened by referencing - *The liveable and adaptable house* and relevant Australian Standards:

<https://www.yourhome.gov.au/housing/livable-and-adaptable-house>

Yarra expects that new developments will promote high accessibility standards by being in accordance with *Liveable Housing Design Guidelines*’ Silver level or higher. Yarra would equally expect that all new developments satisfy the minimum requirements of the Better Apartment Design Standards (BADs) of the Planning Scheme.

Student accommodation

Strategy 36 is supported subject to replacing ‘*Optimise the*’ with ‘*Encourage*’.

Yarra supports the tertiary institutions within the municipality and also student housing that has good access (by walking, cycling or public transport) to these institutions.

As with all development the scale of student accommodation and key worker housing would still need to be respond to the local context. This housing would not come at the expense of creating, enhancing or protecting the identity, character and amenity of a place.

Climate resilient housing

Yarra was one of the first Victorian councils to introduce an ESD Local Planning Policy raising environmental performance standards for new private developments.

Yarra's recently adopted *Climate Emergency Plan* seeks to create a city that continues to adapt to a changing climate and is ecologically healthy for all species. We are now working with other Council Alliance for a Sustainable Built Environment (CASBE) member councils to pursue elevated ESD targets.

Housing tenures

Strategy 39 is supported, however this strategy should include an additional reference to this being delivered in 'tenure blind developments'.

As set out in Yarra's *Social and Affordable Housing Strategy 2019* mixed housing tenures refers to where a portion of a private market housing development is allocated to be social or affordable housing.

This strategy could be expanded to relate to 'Tenure-blind developments' where the social and/or affordable housing allocation is indistinguishable from the private housing in appearance, quality and amenity. The intent of tenure-blind development is to avoid further socio-economic marginalisation and promote community building.

Inclusionary Zoning also offers a mechanism for ensuring dwelling diversity which supports a range of housing needs in inner metro areas, including affordable housing. Further suggestions in relation to this are made under Direction 10.

3.4 Social and affordable housing

DIRECTION 10. Increase the supply of social and affordable housing

STRATEGY 40. Facilitate more affordable housing across the region, particularly in locations that have good access to jobs, services and public transport.

STRATEGY 41. Support a regional approach to determining social and affordable housing needs.

STRATEGY 42. Support the improvement and retention of existing social housing development within the Inner Metro Region.

Yarra has long supported diverse models of housing suitable for households on low incomes within its municipality, been a leader in advocating for the state government to deliver improved housing conditions for existing tenants, and to further increase the local supply of social housing.

In 2019, Yarra Council adopted its *Social and Affordable Housing Strategy*, helping to draw attention to the mechanisms within Council's control that can contribute to achieving a higher proportion of new housing being affordable to very -low, low, and moderate-income households with the municipality.

While Yarra is strongly in support of the increase in the supply of social and affordable housing, Council also recognises the important of ensuring that affordable housing dwellings be built to a high standard in terms of quality, accessibility, durability and energy-efficiency to decrease ongoing maintenance costs.

The plan recognises there is an insufficient supply of affordable housing in the Inner Metro Region and the housing prices are exceptionally higher than other metro regions. It includes directions and strategies to 'increase the supply of social and affordable housing' and 'provide greater choice and diversity of housing in the Inner Metro Region'.

The directions and strategies within the plan are strongly supported but lack specifics and actions.

Affordable housing with good access to jobs, services and public transport

Yarra recognises that geographic locations have different levels of access to employment, education, retail, recreation and services and lower income households may find themselves having to sacrifice better access to services for an affordable home.

Social and economic disadvantages can only be addressed when people have access to transport, wraparound support services (social, health and financial) and employment options.

Any new housing however must respond to the local context: its identity, character and amenity.

Determining social and affordable housing needs

It is recommended that Strategy 41 explore initiatives focused on establishing a robust methodology to *measure* affordable housing need within regions and assess the regional capacity to accommodate current and projected demand

It is likely that more than 30,000 affordable rental dwellings would be needed by 2036 in the Inner Melbourne Action Plan (IMAP) region⁴. Accommodation for people with special housing needs would be around 23% of new dwellings created. Of these, 68% would need to be one bedroom dwellings, 24% two bedroom, 14% three bedroom dwellings, and 4% four bedroom dwellings. Around 66% would need to be for very low income renters, and 19% for low income households (a total of 85% of projected affordable rental dwellings). The balance would be for moderate income renters (15%). (Judith Stubbs, 2020)

Retaining existing social housing development

Strategy 42 is supported, however an additional related strategy is suggested below.

3.5 Gaps

Public housing renewal

Insert a strategy to: *Ensure community benefit from any renewal of public housing is maximised.*

Yarra recognises the need for redevelopment of public housing stock that is rundown, or poor standard and lacking accessibility.

Yarra however has reservations regarding the social benefits of the 'public private partnerships' (PPP), method of redevelopment, which may generate quick wins and short-term revenue relief at the expense of gains for the community.

Inclusionary zoning

Insert a strategy that seeks to pilot Inclusionary zoning. Yarra continues to support the introduction of inclusionary zoning into the *Victorian Planning Provisions*, to be employed either at specific precincts and/or regions. Yarra recognises that this could be an action rather than a strategy.

Affordable housing

As noted above with housing in general, Yarra expects any affordable housing should:

- be tenure blind and integrated with market housing, meaning that subsidised and private dwellings should not be able to be readily differentiated through either their appearance, quality or amenity and should have equal access to all communal indoor and outdoor spaces.
- promote high accessibility standards by being in accordance with *Liveable Housing Design Guidelines* Silver level or higher.
- be built to a high standard in terms of durability and energy-efficiency to decrease ongoing maintenance cost.

3.6 Actions

ACTION 3. Update planning schemes to align with housing policies in Plan Melbourne and the Inner Metro Region Land Use Framework Plan and the implementation of the reformed residential zones. This includes providing capacity for 15 years of regional housing supply focusing on locations identified for housing growth in the LUFFP.

⁴ The IMAP Region includes the Cities of Melbourne, Yarra, Port Phillip, Maribyrnong and Stonnington.

This may require strategic planning work to support these changes such as preparing or updating local housing strategies or preparing structure plans to further investigate where increased densities can be supported, and determine specific changes required to planning schemes.

ACTION 4. Identify underutilised and surplus government land that has the potential to deliver additional social housing.

ACTION 5. In partnership with councils, identify a pipeline of sites in the Inner Metro Region for social and affordable housing.

In terms of Action 3, Council is in the process of progressing Amendment C269 which rewrites Yarra's local policy framework. This process is well progressed with the amendment currently being considered by an independent planning panel. Council considers policy in Amendment C269 strongly aligns with LUFPP except the application of the 800m walking catchment. As noted above, this is not supported.

Council also notes that the amendment is being supported by capacity work which identifies that Yarra can accommodate the growth predicted in the VIF 2019.

Actions 4 and 5 are generally supported.

4.0 Integrated transport

While Yarra is well positioned to facilitate the use of sustainable modes of transport, increasing car use and parking demand continues to create pressure and congestion in Yarra's streets, not just for cars but for other transport modes using the road system. The competition for the limited physical space within streets is an ongoing issue. Facilitating sustainable journeys on all transport modes will support the productivity, wellbeing and environmental values of the community. Yarra needs to reduce car dependence by promoting walking, cycling and public transport as the preferred forms of transport.

4.1 Transport connections

DIRECTION 11. Improve transport connections to support the region's competitive advantage as the economic, cultural and services hub of metropolitan Melbourne and Victoria

STRATEGY 43. Ensure major road and rail projects include public and active transport improvements and connections.

STRATEGY 44. Improve public and active transport connections to, from and through the Inner Metro Region for work, education and leisure.

STRATEGY 46. Improve public and active transport connections across the Yarra River, orbitally within the region and between major activity centres and regionally-significant places.

STRATEGY 47. Improve orbital movement corridors across the region.

STRATEGY 48. Support cycling for transport through the development of Strategic Cycling Corridors in the Inner Metro Region.

STRATEGY 49. Facilitate land use change to respond to access improvement delivered by major public transport projects.

Direction 11 and Strategies 43, 46, 48 and 49 are supported. The direction and these strategies are consistent with Council's proposed planning policy framework – being implemented through Planning Scheme Amendment C269.

Public and active transport connections

Strategy 44 is supported. However, this strategy could be expanded to outline how investment should be prioritised for example: completing missing public transport links, focus on areas with high growth.

Orbital movements

The concept of orbital movements via active and public transport in Strategy 47 is supported. However, Page 78 paragraph 3 refers to orbital movement corridors for various modes, including bicycles, and lists Victoria Parade, Alexandra Parade, Johnston Street and Hoddle Street. These corridors are not adequate for cycling and are not included in the Strategic Cycling Corridors. This paragraph could be clearer and emphasise that adequate orbital cycling access is currently limited and needs improvement/investment in accordance with the Strategic Cycling Corridors.

Page 78 paragraph 5 could be expanded to acknowledge that shared micro-mobility services (e-scooters and e-bikes) could also provide a new/innovative sustainable transport option for short/local and 'last mile' trips in Inner Melbourne. See further comments in Actions.

4.2 Active transport

DIRECTION 13. Improve active and public transport options to promote mode shift and support 20-minute neighbourhoods

STRATEGY 54. Enhance public transport coverage, frequency and capacity, improving access to destinations across the network.

STRATEGY 55. Deliver a convenient, safe and attractive pedestrian network connecting key destinations, and linking regionally-significant places and key cultural and sporting destinations.

STRATEGY 56. Improve walking and cycling access to train stations to support medium- and higher-density housing outcomes.

STRATEGY 57. Provide walking and cycling routes and drop-off zones to health and community services, and recreation facilities.

STRATEGY 58. Plan for place in transport connector improvements.

Council is aiming to make Yarra a place where everyone can ride, walk or cycle to their destination, through an integrated network of best practice protected bike lanes, improved footpaths and support for level access tram stops.

Council strongly supports the integration of land use and development planning with public and active transport infrastructure and services to create compact, walkable, pedestrian-oriented, mixed-use communities centred around train stations and other key public transport nodes.

Direction 13 and Strategies 54 to 57 are supported. However, it is noted that many of these strategies will be implemented through mechanisms outside the planning scheme and will require strong commitment from the Department of Transport, public transport providers and other government agencies.

The intent of Strategy 58 is unclear as to whether this is referring to placemaking or something else.

4.3 Transport interchanges

DIRECTION 14. Plan for transport interchanges as destinations and places for movement

STRATEGY 59. Ensure the design of transport interchanges and corridors improves active travel, public areas and their functions, and contributes to a sense of place.

STRATEGY 60. Balance movement and place when designing and upgrading the region's road network.

STRATEGY 61. Design streets that provide for sustainable transport modes and improve the public realm.

Council also wishes to create a built environment with public spaces that promote social interaction and are connected to the transport network.

Council supports this direction and its strategies, including the acknowledgment of Richmond Station as a significant transport interchange, as well as the strategies to support active transport to transport interchanges and place outcomes.

It should recognise however that Richmond Station provides access to not only the Sports Precinct but also Swan Street Major Activity Centre and the Cremorne Enterprise Precinct.

Strategy 60 could be expanded to better explain what is meant by 'movement' and 'place'. The strategy could mention aspects such as the needs of all users of this space including pedestrians, cyclists, deliveries, private vehicles and public transport, as well as people spending time in those places.

4.4 Freight movement

DIRECTION 15. Improve freight efficiency and increase capacity of gateways while managing impacts on urban amenity

STRATEGY 62. Support innovative approaches to urban deliveries, such as consolidation centres, cargo bike trials and out of hours deliveries, to reduce congestion and improve environmental outcomes.

STRATEGY 63. Ensure major land use and transport infrastructure projects appropriately consider the impacts of last kilometre freight movements while seeking to implement measures to improve the efficiency of urban freight deliveries.

Direction 15 and Strategy 63 are supported. Strategy 62 is supported with the addition to include transitioning fleet vehicles for deliveries to zero emissions, to improve amenity and environment outcomes such as noise and air quality, as per the State Government's *Zero Emissions Vehicle Roadmap*.

4.5 Gaps

The strategies do not address the topic of transport innovation and technology. For example, shared micro-mobility, e-bikes, electric buses, automated vehicles etc.

4.6 Actions

ACTION 6. Apply the Movement and Place Framework to the Inner Metro Region's arterial road network and allocate priorities for transport connector improvements such as improving road space allocation for public and active transport, identify priority streets for walking and cycling, and road management and use arrangements.

Action 6 is strongly supported in Yarra's activity centres. Revitalising and reactivating our activity centres, which are currently experiencing economic changes, is an important priority for Yarra. A focus on movement and place could enhance outdoor dining, spaces to meet, active transport and allow creative interventions such as street art. The action should also reference transport interchanges and transport corridors.

Council acknowledges that balancing movement and place can be challenging and time consuming given the potentially conflicting objectives. The process would require funding and a strong commitment from State Government and its agencies.

In addition to Action 6, additional actions are required to deliver the range of strategies. Council suggests adding the following actions:

- Deliver the Strategic Cycling Corridors in a timely and prioritised approach to support this direction and mode share targets, responding to Strategy 48
- Review the public network and identify improvements for orbital movement, responding to Strategy 46 and 47
- Develop pilot and trials to deliver cycling infrastructure, responding to Strategy 48.

5.0 Liveability

Yarra is known as a place where its rich natural, Aboriginal, built and other cultural history is protected and celebrated. It helps to define the city's identity and support its diverse living culture.

The diversity and distinctiveness of neighbourhoods and places across Yarra are an inherent part of its character and attraction. Importantly this creates a strong sense of place for local communities. Enhancing our great places and precincts is fundamental to its liveability.

5.1 Cultural heritage

Direction 16. Draw on the region's culture and heritage to create a rich and layered urban environment and distinctive places

STRATEGY 64. Engage with Aboriginal communities to incorporate cultural heritage, design and stories into built and natural environment.

STRATEGY 65. Reflect the different eras, layers and aspects of the region's history in the design of contemporary buildings, public spaces, infrastructure and public artwork where appropriate.

STRATEGY 66. Ensure the ongoing identification and protection of heritage places, precincts and streetscapes and support their adaptive re-use where appropriate, particularly for creative and cultural uses.

Heritage is an important feature of Yarra's identity, which comprises historic buildings, landscapes, landmarks, streetscapes, subdivision pattern (made up of its streets, lanes and boulevards) and indigenous heritage.

Direction 16 recognises inner region's rich culture and history and is supported.

Strategy 64 is supported but should specifically reference the Wurundjeri Woi Wurung and Boon Wurrung peoples. The strategy is consistent with Yarra's *Yana Ngargna Plan 2020–2023*. The idea of visible culture is an action in Yarra's *Yana Ngargna Plan 2020–2023*. The plan cites The Stolen Generations Marker, Smith Street Dreaming Festival and the use of Woiwurrung language to name Bargoonga Nganjin as good examples of Council projects that have succeeded in increasing the Aboriginal and Torres Strait Islander community's visibility.

Strategy 65 is also supported.

Strategy 66 references the reuse of heritage buildings particularly for cultural and creative uses. While desirable, in Yarra most adaptive re-use is for business and residential uses.

The text in '*Post-European settlement heritage*' on Page 92 states that the Royal Exhibition Building is on the UNESCO World Heritage List as a site of international cultural significance. This should be referenced as the Royal Exhibition Building and Carlton Gardens (REB&CG). Council suggests wording from the Draft Strategy Plan may assist. The LUPF should also recognise the World Heritage Environs Area surrounding the World Heritage site.

5.2 Open space

DIRECTION 17. Strengthen the network of open spaces and trail connections to support outdoor life, active recreation and connection to nature

STRATEGY 67. Make better use of the existing open space network through ongoing investment to ensure it meets community needs.

STRATEGY 68. Establish new open spaces within large development sites and urban renewal precincts that contribute to the regional open space network.

STRATEGY 69. Create safe and efficient links between public spaces and the shared trail network.

STRATEGY 70. Investigate opportunities to repurpose existing public land, such as easements, as part of the open space network.

STRATEGY 71. Utilise the region's open space network to strengthen its tree canopy and urban greening, aided by water sensitive urban design and stormwater harvesting.

Open spaces within Yarra make a significant contribution to the distinctive character and amenity of neighbourhoods. They provide passive and active recreation, contribute to the city's tree canopy, and possess cultural values in places of European and indigenous heritage.

Direction 17 is supported as it recognises the need to protect and improve existing open spaces, create new open space and be creative about finding new opportunities for open space. This aligns with the *Yarra Open Space Strategy (2020)* which seeks to deliver an '*expanded and improved public open space network that contributes to a more liveable and sustainable Yarra*'.

Strategies 67, 68 and 69 are supported.

Strategy 69 could be expanded to more strongly highlight the need to connect the gaps in trails / network such as along the Yarra River. This is critical in regional planning for this network.

Yarra's *Open Space Strategy* has identified there are gaps in locations where the community lacks easy walkable access to any open space. Additional open space is required to address gaps in the provision and diversity of open space especially where densities are forecast to increase. Strategy 70 is strongly supported. Yarra is investigating how existing public land can be repurposed into open space as part of the *Yarra's Open Space Strategy*. This includes road closures to create or expand open space.

Strategy 71 - Support. This aligns with Yarra's *Urban Forest Strategy 2017* and *Climate Emergency Plan 2021* which seeks to increase canopy cover despite significant development growth.

5.3 Great public streets and spaces

DIRECTION 18. Create a legacy of great streets and public spaces that serve the needs of visitors, residents and businesses

STRATEGY 72. Identify, enhance and protect existing places and spaces that have high civic or public value, and which contribute to people's understanding, interaction and enjoyment of the region.

STRATEGY 73. Ensure that future planning of the region's precincts, activity centres and urban renewal areas enhances and celebrates their distinctive assets, heritage and local character.

STRATEGY 74. Upgrade key pedestrian streets and public spaces within each activity centre to foster their civic and community role and to ensure they are accessible and inclusive. Within urban renewal precincts, create new pedestrian streets and public spaces to serve this role.

STRATEGY 75. Encourage road space allocation to prioritise pedestrian movement and spaces within key streets in activity centres and employment precincts.

STRATEGY 76. Identify opportunities to expand the network of boulevards through the region, creating high amenity, green streetscapes that prioritise sustainable and active transport modes.

STRATEGY 77. Ensure the public realm design of the Inner Metro Region's nighttime precincts promotes a high level of safety and amenity.

Great places where people want to visit and stay are dependent upon quality design outcomes – both for private development and in the public realm. Great public spaces reflect diversity, encourage interaction and invite people to be on the street. They not only benefit the community by offering spaces to comfortably and safely move through or relax and meet, but they also have the potential to boost the local economy.

Direction 18 is supported. However, in this section of the LUFPP there is a significant focus on boulevards which only form a small proportion of streets in the region. While boulevards are an important part of our street network, the role other major and local streets play in the liveability of a city must also be recognised. There is also little direction of public spaces, or how *great streets and public spaces* should provide for the needs of visitors, residents and businesses. In the Inner Metro Region it is more about 'redesigning streets' as there is unlikely to be significant additions to the road network.

Strategy 73 is supported however 'enterprise precincts' should be included

Strategy 74 - Support however acknowledgment should be given to the constraints in the existing road network, that will require significant resources to redesign and rectify.

Strategy 75 - Support. This strategy should be expanded to also encourage road space allocation to active transport consistent with other strategies in the LUFFP.

Strategy 76 focusses on boulevards. Council is seeking to improve the built form character and streetscapes of Yarra's boulevards - Alexandra Parade, Hoddle Street, Victoria Parade and the south end of Queens Parade but notes these boulevards are also main roads with high traffic volumes, and not places where people are attracted to. See comments above in Direction 18.

Strategy 77 is supported. Council's *Economic Development Strategy* recognises the need to 'grow the night time economy and proactively manage safety and amenity challenges to enhance people's experience when visiting Yarra's night time precincts'.

5.4 Biodiversity

DIRECTION 19. Protect the region's landscapes and biodiversity

STRATEGY 78. Work with Traditional Owners to plan, manage and protect assets and places of high cultural, landscape and biodiversity value.

STRATEGY 79. Ensure the siting and design of new buildings and infrastructure responds to the region's significant landscape features.

STRATEGY 80. Reinvigorate and restore urban waterways, recognising their important role in providing biodiversity, open space, water management and movement corridors.

A key direction of Council is the restoration of Yarra's urban ecosystems and preserving Yarra's unique urban biodiversity. Yarra's adopted *Nature Strategy – Protecting Yarra's Unique Biodiversity 2020 - 2024* identify key areas of biodiversity within the municipality. Amongst its goals, it aims to 'increase the diversity, connectivity and resilience of Yarra's natural environment' and 'encourage people to further appreciate and actively enhance Yarra's natural landscape.'

Council's *Nature Strategy* also acknowledges that the Wurundjeri Council are key partners in the management and appreciation of natural values in the City of Yarra, as many or all of the natural values are also cultural values. Engagement and involvement of the Wurundjeri Council to ensure their values and stories are honoured and conserved is integral to the Nature Strategy. Council supports this strategy opportunities to work with the Wurundjeri in recognition of their heritage and custodianship of the land.

Direction 19 and its strategies are aligned with Council's *Nature Strategy* and are supported.

Strategy 79 would benefit from further clarity as 'significant landscape features' have not been defined by the LUFFP.

5.5 Actions

ACTION 7. Develop and implement an Indigenous design approach to incorporate Aboriginal cultural heritage, design and stories into the region's built and natural environment. This process will involve extensive collaboration and engagement with Aboriginal and Torres Strait Islander peoples across the region. This could be a pilot project suitable for other regions.

ACTION 8. Work with Traditional Owners and research organisations to develop specific and measurable actions to increase biodiversity and resilience of urban ecosystems, particularly those that do not have high biodiversity value.

Council supports the inclusion of Action 7.

Action 8 is also supported and, as highlighted above in Direction 19, aligns with Council's *Nature Strategy*.

5.6 Gaps

The delivery of public open space is a key issue identified in Council's *Open Space Strategy*. Council is currently pursuing a planning scheme amendment to increase the public open space contribution rate in the planning scheme as a key mechanism to secure more public open space in Yarra.

Council considers the LUPF is lacking in actions which assist in the delivery of public open space. The plan should acknowledge the State Government's '*Open Space for Everyone*' – *Open Space Strategy for Metropolitan Melbourne 2021*' and could cross-reference some important actions it contains or tailor some of its actions specifically for the inner region. For example, one of the actions noted is a 30 year investment opportunities framework. The purpose of this plan is to '*identify gaps in the network and would guide priorities, funding and responsibilities for initiatives to fill the gaps*'. Other on-going State Government programs such as the 'Local Parks Program' are also strongly supported by Council.

In addition, an action around the World Heritage Environs area is also suggested. A precinct of World Heritage status requires planning, implementation and coordination actions for maintaining, and celebrating this world heritage status.

6.0 Strong communities

Yarra's population is growing and the needs and preferences for services is changing. Flexible, well-located and maintained social and community infrastructure is a priority for Council. Social infrastructure includes the places, spaces, physical assets, services, programs and activities that are accessed by the community for social interaction, recreation and physical activity.

6.1 Planning for major social infrastructure

DIRECTION 20. Plan for major social infrastructure at a regional level to meet the needs of residents, workers and visitors

STRATEGY 81. Review the demand for, and opportunity to, upgrade and expand existing social infrastructure such as libraries or facilities for recreation, health or education, to enable them to be more flexibly and intensively used.

STRATEGY 83. Encourage planning for major social infrastructure (such as libraries, recreation facilities, cultural centres or community hubs) to be undertaken in conjunction neighbouring regions to maximise co-location of facilities.

STRATEGY 84. Locate social infrastructure near activity centres and to be accessible by walking, cycling or public transport.

STRATEGY 85. Support regional planning that will provide for a range of sporting and active recreation facilities to meet the needs of the growing population.

Council's *Community Infrastructure Framework* (2016) highlights that social / community infrastructure must recognise the changing nature of the inner city by providing flexible, accessible innovative and adaptable facilities that reflect universal design and are able to meet multiple service needs.

Direction 20 and Strategies 81, 83, 84 and 85 align with the directions in the Framework and are supported. For example, the Framework identifies opportunities for shared use and partnership opportunities with State Government and private organisations. It also seeks to deliver links to community infrastructure which enable people to meet socialise and engage formally and informally.

See comments in Gaps below in relation to recreation.

6.2 Health and education precincts

DIRECTION 21. Support the region's role in delivering state-significant health and education services while providing for the local community

STRATEGY 86. Strengthen the role of health and/or education precincts of the Inner Metro Region by co-locating new health and/or education facilities within these precincts and encouraging an agglomeration of ancillary uses such as primary healthcare, retail and accommodation.

STRATEGY 87. Expand the network of health and education facilities and precincts across the region to meet the needs of the growing population. Ensure that these facilities and precincts are accessible by public transport, walking and cycling.

STRATEGY 88. Support the upgrade of existing health and education infrastructure to encourage more intensive use of those services.

Major health and education precincts across metropolitan Melbourne have been identified in *Plan Melbourne* for further services and jobs growth. These precincts are seen to stimulate innovation, create employment and are of fundamental importance to the emerging knowledge economy and surrounding communities.

The identification of regionally significant health and/or education precincts provides an additional layer to *Plan Melbourne* which only identifies precincts of State Significance.

The LUFP identifies the following State and regionally significant health and/or education precincts in Yarra:

Health and/or Education Precinct	Location
State significant Health Precinct	Epworth Hospital (Richmond)
Regionally-significant Education Precinct	Melbourne University (Burnley) Melbourne Polytechnic (Fairfield) Melbourne Polytechnic (Collingwood) Kangan Institute of TAFE (Richmond)
State-significant Health and Education Precinct	St Vincent's and Australian Catholic University Precinct (East Melbourne/Fitzroy)

Direction 21 and Strategies 86 to 88 are supported.

Proposed strategies in the *Yarra Planning Scheme - Rewrite of local policies – Amendment C269*, which is currently before a planning panel, support the expansion of health-related employment and services in Yarra's health precincts. It notes health related employment is projected to grow substantially, and proximity to established hospitals is an important factor for the location of a large proportion of these jobs.

The SEES notes Yarra's health precincts will be under pressure to accommodate considerable growth to 2031. An additional 70,000 sqm of additional floor space would be required across Victoria Parade and Bridge Road to accommodate projected growth (a 45% increase). A total of 206,000 sqm of additional institutional floor space is projected to 2031.⁵

6.3 20 minute neighbourhoods

DIRECTION 22. Strengthen the inner Metro Region's network of 20-minute neighbourhoods

STRATEGY 90. Plan for existing and new activity centres to embed the 20-minute neighbourhood hallmarks, through a place-based, community partnership approach.

STRATEGY 91. Support a consistent designation of neighbourhood activity centres and their role in the network of activity centres across the Inner Metro Region.

STRATEGY 92. Support the role of neighbourhood activity centres to provide a range of retail, community and allied health services to their respective local catchments.

STRATEGY 93. Ensure the planning and design of urban renewal precincts and major transport infrastructure projects maximises opportunities to embed the hallmarks of 20-minute neighbourhoods.

20 minute neighbourhoods

Direction 22 and Strategies 90 and 93 are supported in principle. Creating 20 minute neighbourhoods – where people can access a range of shops, local services within 20 minutes of home aligns with Council's housing, sustainability and transport policies. Historically much of the inner city already achieves a 20 minute neighbourhood with high levels of accessibility.

Both strategies use the term 'hallmarks of 20-minute neighbourhoods' but these are not defined in LUFP. A definition of the hallmarks/characteristics would assist in implementing this strategy.

⁵ SEES, page 66

Neighbourhood activity centres

It is unclear what issues Strategy 91 is trying to address and what a 'consistent designation of neighbourhood activity centres' means.

Strategy 92 which supports the role of neighbourhood centres in providing a range of retail, community and allied health services is consistent with the Council's current and proposed policy framework and is supported.

6.4 Actions

ACTION 9. Develop a methodology for a social infrastructure strategy for the Inner Metro Region. This would consider social infrastructure such as libraries, multi-use community and recreation facilities, and assess how they can be used more flexibly and intensively. This could be a pilot project suitable for other regions.

Council supports this action in principle. However, the scope needs further clarification. It is unclear if it is intended to address local as well as regional services. The project also requires dedicated funding.

6.5 Gaps

Planning for health and/or education precincts

There is no action which addresses how health and education precincts will be encouraged and planned for. Like the strategies in the LUFP, Council's planning policies seek to encourage health care and uses to locate with the precincts, however there are no implementation plans to support this.

Implementation plans for Yarra and inner city should to consider opportunities / limitations on expansion, public transport access, public stop accessibility, improvements to public realm such as providing seating, and how to facilitate ancillary uses. As noted under Direction 21, amenity impacts on surrounding commercial and residential areas also need to be considered. They will need to be developed in partnership with health and education providers (State or private), State Government departments and the community.

Sport and recreation as a key land use

A major gap in the LUFP is any reference to recreation and sports grounds. The plan includes references to industry, population growth, transport infrastructure and climate, but has no meaningful mention of sport and recreation – a key land use in the inner city.

The pandemic has proved that people want to access quality sport and recreation facilities in and around their neighbourhood and municipality.

This has highlighted a number of issues, including where the new population going to recreate, who is going to fund this and what could be done to assist Councils and communities?

The focus in Directions 1 and 20, which mention recreation, is in the context of big venues in the region and economic attraction. There is nothing of note in relation to local infrastructure and access. Council considers there should be a greater focus in the plan on people being active. Consequently, it should contain more specific content addressing the lack of sportsgrounds and other sports and recreation facilities.

The plan also does not identify Yarra Bend Park as the last of the existing current sports infrastructure that could be invested in to accomplish social connection and health outcomes. It is mentioned in relation to wildlife and nature conservation, which is supported but there is no discussion about how the capacity and use of the park can be improved to cater for more people.

7.0 Sustainability and Resilience

To better manage increasing pressures on natural resources, higher levels of population growth, and the effects of climate change, there is a need to improve how environmental sustainability is incorporated into how the built environment is designed and planned.

Yarra has long advocated for stronger environmentally sustainable design controls in the planning and building process and has adopted its *Climate Emergency Plan* as a call to action.

The focus throughout the LUPF on sustainability and resilience is welcomed. However, it must stronger commitments to a zero emissions built environment.

7.1 Managing urban heat

DIRECTION 23. Integrate cooling and greening initiatives with land use and infrastructure change to assist in managing urban heat

STRATEGY 94. Design and develop outdoor spaces that are cool on hot days through materials, vegetation and water sensitive urban design particularly in and around activity centres, within the Central City, on major redevelopment sites and within urban renewal precincts.

STRATEGY 95. Encourage the greening of roofs, façades, walls or building setbacks with irrigated, climate resilient planting within apartment developments and large commercial or industrial sites.

Direction 23 is supported. This direction strongly aligns with Council's *Climate Emergency Plan* which seeks to 'create a climate-adapted city'.

Strategies 94 and 95 and the text which sits under Direction 23 would benefit from acknowledging the other measures that can and should be used for urban cooling, especially given space constraints for additional trees in highly urbanised areas: e.g. roof or façade materials in light colours with high albedo / solar reflectivity; shading structures and through orientation; passive cooling techniques; permeable paving and light coloured hard surfaces.

For example:

"Expansion of the tree canopy is the most effective measure to reduce the impact of urban heat. However, due to the compact urban form of many parts of the Inner Metro Region and lack of space for new canopy trees, other forms of cooling and greening infrastructure will need to be used. This includes vertical and rooftop greening, green façades and planting more compact forms of vegetation within laneways, streets or narrow building setbacks. Cooling and greening needs to be considered for buildings, open spaces and pedestrian connections between key destinations"

7.2 Increasing tree canopy cover

DIRECTION 24 - Increase the tree canopy cover across the Inner Metro Region to achieve 28 per cent cover by 2050.

STRATEGY 96. Support alternative siting of buildings and more compact building forms to retain mature canopy vegetation.

STRATEGY 97. Increase tree canopy along urban waterways and on streetscapes, public land, large developments within activity centres, open spaces and road reserves, and large commercial and industrial sites.

STRATEGY 98. Require revegetation within the redevelopment of key sites, activity centres and urban renewal precincts to allow for the irrigation and spatial requirements of a healthy urban forest and dense tree canopy cover.

Direction 14 which seeks to increase the tree canopy cover across the Inner Region to 28% by 2050 is strongly supported.

Council notes that this figure is based on *Liveable Melbourne* to which Yarra was a signatory. It differs from target in Council's 2018 Urban Forest Strategy that by 2040 increase the canopy cover for the whole municipality by 25% a 17% baseline in 2014.

Council's *Climate Emergency Plan* and *Urban Forest Strategy* identify the need to enhance our urban forest to increase tree canopy, diversity and climate resilience.

Strategies 97 and 98 are supported.

Building siting to accommodate canopy trees

Strategy 96 is a worthwhile strategy. It would benefit from discussion about what is meant by alternative siting, especially when the siting of new developments can often follow the precedent that has been set by the existing building. For example, in inner urban area, many buildings are already built to the boundary with no set back from the street.

Canopy trees at the front of the property provide public benefits of shading footpaths and roads, as well as the building. Council considers that further work / guidance is required to explore options for how this could be achieved in the inner city with its small lots, pattern of front or backyards and numerous heritage buildings.

Increasing canopy trees on private land

The LUPF acknowledges that inner metro region is losing tree canopy in the private realm. Table 14 includes an aspirational distribution of tree canopy cover that shows 40% of the canopy should be met on residential, commercial, and industrial sites. This is a substantial proportion given the existing site constraints and allowable built form outcomes. The inclusion of carriageways could assist with meeting the targets through street tree planting that occur outside of private lots. As noted above, further work is needed to enhance canopy cover on private land. Noting the public realm cannot do 'all the heavy lifting' when it comes to increasing canopy, it is unclear why parks, open space and waterways have a smaller tree canopy cover target than the residential, commercial and industrial areas.

The LUPF should show what the percentage is now and what percentage change is needed from these sectors to achieve the desired canopy cover. Ongoing mapping of the different target categories needs to be undertaken to monitor how LGA are tracking.

7.3 Integrated Water Management

DIRECTION 25. Implement integrated water management initiatives to improve water quality, reduce the impacts of stormwater inundation, utilise stormwater and protect the region's key water assets

STRATEGY 99. Implement a regional approach to floodplain management and waterway drainage.

STRATEGY 100. Retain and harvest stormwater at a range of scales to achieve co-benefits that respond to urban heat, reduce runoff volume and velocity, service community infrastructure and trees, and reduce reliance on potable water for urban greening.

STRATEGY 101. Design development to provide passive irrigation to onsite vegetation and on adjacent public land not affected by industrial contamination and/or seawater infiltration.

Council adopted its *Integrated Water Management Plan 2020-2030* in 2020. Its vision is to create 'A water wise city in a healthy urban environment'. Direction 25 and Strategies 99, 100 and 101 are consistent with this and are supported with some minor edits.

In the 'State of Play', the current context and issues for 'Urban heat environments' are well articulated and supported by the evidence, both existing and projected urban heat conditions.

In contrast the 'Flooding risk and waterway health' section discusses the current conditions broadly but does not clearly articulate future risks to flood and waterway health, particularly due to climate change. This section could draw on other DELWP climate change / flood management / integrated water management work to do this.

In Strategy 99, 'waterway drainage' should be replaced with 'waterway management and waterway health' as waterway drainage is narrow and is no longer a term that is used in relation to waterways. It is suggested this section is aligned with DELWP catchment management / integrated water management work.

Strategy 100 should include the term ‘treat’ as well as “retain and harvest” to maintain a focus on improving water quality before it is discharged to waterways and not just on capturing and harvesting water for use.

It is suggested that stormwater is broadened to include ‘rainwater and stormwater’ as there is still considerable potential to intercept clean rainwater from roofs and facades before it becomes polluted stormwater.

Strategy 101 should be reworded to make it clearer. Council suggests the following:

Design buildings, precincts and the public realm to maximise opportunities for water sensitive design and address stormwater management needs. This would enhance urban cooling and greening, improving pedestrian environments.

7.4 Zero emissions

DIRECTION 26. Design urban renewal precincts and major redevelopment sites to support zero emissions and climate resilient urban areas

STRATEGY 102. Maximise the thermal efficiency and ability to support renewable and smart energy technology of the built environment through site layout and precinct design in major redevelopment sites and urban renewal precincts.

STRATEGY 103. Design buildings and the public realm with future stormwater needs and opportunities as a priority consideration to inform other precinct and building design outcomes and enhance pedestrian environments.

Strong commitment to zero emissions

Council considers Chapter 9 should be much stronger on commitments to a zero emissions built environment.

For the Victorian Government to meet its target of net-zero emissions by 2050, it needs to be clear that land-use planning to enable a zero-emissions built environment is a key part of achieving that target.

As a minimum, Direction 26 should say to ‘achieve a zero emissions standard’ not ‘support zero emissions’. In addition, this direction should not only apply to urban renewal precincts and major redevelopment sites but across all forms of development.

7.5 Gaps

Elevating ESD standards

The ‘Sustainability in the built environment’ section of the chapter discusses the ESD work by local councils through planning, but should make reference to the joint Elevating ESD Targets Planning Policy Amendment project with the Council Alliance for a Sustainable Built Environment (CASBE) and 29 urban and regional Victorian councils.

The project is working towards a planning scheme amendment that builds on the existing local Environmentally Sustainable Development (ESD) Policies to deliver revised and elevated ESD targets for new development, including targets for zero carbon development.

Council recommends the LUPF should include a direction or strategy to ‘*strengthen and extend ESD considerations for commercial and industrial developments.*’ This is not currently discussed in the LUPF and would complement a key area of reform identified in the ESD Roadmap.

Strategy 103 does not appear to be in the correct location and would better fit under Direction 25 as it appears to relate more to stormwater.

Renewable and distributed energy systems

The LUPF is currently silent on distributed and integrated energy systems (such as local renewable energy generation, networks, storage and integration of electric vehicle charging) for major new developments or urban renewal areas. The LUPF should include planning for these types of emerging systems.

Circular Economy

The LUPF mentions the Victorian Government’s strategy to develop a circular economy but does not include any discussion, strategies or actions for land use planning to enable the development of a circular economy.

Given the LUF has a 2050 time horizon, it should include discussion of the circular economy as they relate to land use planning, such as a desire to design out waste, recirculate finite resources at local/regional scales and support land use planning for local/regional waste facilities, and avoiding the transportation of waste vast distances. For new precinct-scale developments, the LUF should discuss the opportunities for future precinct-wide waste/resource collection, reuse and recovery systems. These may include waste energy, organic waste products and gases, and wastewater.

Decarbonisation of the gas sector

The LUF also does not appear to acknowledge the Victorian Government's focus on decarbonisation of the gas sector and their work on the 'ESD Roadmap'. There is a need for stronger planning policy to drive a gas-free, zero-carbon built environment.

As noted in Council's submission to the *ESD Roadmap*, there is an opportunity for the Victorian Government to accelerate gas substitution in new developments. This can be achieved by State and other Local Governments introducing consistent zero carbon (gas-free) planning provisions.

Links to other work

In finalising Chapter 9 'Sustainability and resilience' it would be useful to communicate the linkages between the sustainability and climate change related measures in the LUF with those in the ESD Roadmap, Built Environment AAP, along with the work underway by local councils through the Elevating ESD Targets project.

7.6 Actions

ACTION 10. Identify non-residential land where additional canopy trees can be planted to offset vegetation removal.

ACTION 11. Investigate options to develop a pilot fund to underground powerlines to support expanded tree canopy cover.

ACTION 12. Undertake detailed coastal settlement planning to identify short-, medium- and long-term options to reduce risk to population, infrastructure, ecosystems and property from sea level rise, storm surges, coastal erosion, tidal inundation and saline groundwater intrusion.

Offsetting vegetation removal

Action 10 is unclear. It could expand its scope by the deletion of 'non-residential' land. This change will assist in the achieving the tree canopy cover increases across all landuse types. If the intention of this action is to propose the use of vegetation offsets, then the action needs to be made clearer.

Depending what is actually being proposed here, Council has concerns about potential offset schemes for the following reasons:

- There are competing and diminishing opportunities for additional tree planting on public land. Roles and responsibilities in an offset policy would need to be clearly identified.
- Tree planting opportunities available on public land should be taken up to maximise urban cooling. In that sense, it would not be a genuine offset.
- Tree planting for urban cooling has highly localised benefits. It is not like carbon emissions to the atmosphere which lends itself more to offset schemes. That is, our cities particularly need additional tree planting in the specific locations that are hotter (as shown by the heat vulnerability mapping in the LUF). The same outcome is not achieved if trees are removed in an area as part of a new development but planted elsewhere as an 'offset'.

Undergrounding powerlines

Action 11 is a worthwhile action, mainly for new development precincts where it is more likely be viable. However, if the LUF is putting forward specific funding actions around powerlines, it should consider those that may be less expensive and could be done more readily in more areas, such as bundling aerial powerlines.

Additional actions

The LUFPP would benefit from identifying if or how other potential actions related to the points raised above are already being progressed through other State Government strategies such as land use planning to enable a circular economy and planning measures that are in the *Built Environment Climate Change Adaptation Action Plan*. A further example is the *Built Environment Climate Change Adaptation Action Plan*, which includes actions that would extend spatial mapping and hazard exposure modelling to support land use and infrastructure planning, design and investment. A key part of this will be further developing and sharing spatial information and modelling risks based on future climate scenarios with local councils.

8.0 Implementation

New provisions in the planning scheme

The LUFP identifies that the plan will be largely implemented through the planning scheme.

Careful consideration is required as to how the plan's directions and strategies will translate into planning policy and inform decision making. Council officers would value the opportunity to review any proposed planning provisions before they are approved.

It is also important the maps are accurate, rather than indicative, and clearly assist decision making. Comments on the maps can be found in Appendix 1.

It is unclear how changes to policy once embedded in the Scheme would occur. Council must have the ability to propose changes / updates to regional policy which may be required over time. For example, if Council were to propose changes the boundaries of activity centres or a major rezoning is mooted.

Other actions

A number of short to medium term actions are included in the Inner Metro Region LUFP. The five- year action program summarises these actions to be delivered collaboratively by the State Government and councils in the Inner Metro Region.

Yarra strongly supports this on-going collaborative approach. Local councils in the Inner Metro Region are already working together to address priority issues for their region and with the State Government such as through the Inner Metropolitan Partnership and the M9 group of Councils.

This submission highlights that there is need for further detail on the implementation plan and actions, so it has a forward plan over 30 years, alongside appropriate monitoring and updating.

Many of the directions and strategies in the plan will be implemented outside the planning scheme. Successful implementation of the plan will be dependent upon improved cross-government commitment and co-ordination. The LUFP must be clear on how its strategies will be implemented – at local, regional or State levels. There needs to be more clarity around funding, timing and responsibility.

Given the breadth of the issues covered in the document, the LUFP has a small number of actions. This submission suggests a range of additional actions that could be pursued across the inner metro region to help successfully implement the plan. These include ongoing monitoring, research and data gathering and funding.

The LUFP identifies there are many actions under *Plan Melbourne* and other government programs and initiatives, such as the Metropolitan Partnerships, that will contribute to improving planning outcomes in the Inner Metro Region. However, it does not list these actions, leaving the impression there are gaps in the document.

Cross referencing actions in other documents or projects being undertaken by the Inner City Partnership would assist in understanding how aspects of the plan are being implemented.

Appendix 1 - Comments on Figures, Maps and Tables

Productivity

Maps and Tables	
Map 2	<p>Council is currently progressing Amendment C269 which is defining the boundaries of our Major Activity Centres. The boundaries included on Map 2 should reflect the outcomes of the Amendment once finalised.</p> <p>Use of term 'Regionally significant commercial land' is confusing. Key should also note these are Major Activity Centres.</p> <p>This plan should also show Neighbourhood Activity Centres as it is labelled Precincts and Activity Centres.</p> <p>Collingwood (including Gipps Street) and Cremorne are shown as 'regional significant industrial land'. This is not supported. Both areas are zoned Commercial 2 and identified as 'enterprise precincts' on other maps in the Plan. Naming and mapping should be consistent.</p>
Table 3	<p>Do not support the inclusion of Abbotsford Industrial Precinct as regionally significant without the opportunity to transition in the longer term. (See the comments in the body of this submission.)</p>
Table 6	<p>Delete table as:</p> <ul style="list-style-type: none"> it is not referenced in the Directions or strategies so its purpose and implementation are not clear it is not clear if these descriptions have had regard to the changing nature of retailing, and reflected retail vacancies (not just from COVID-19) does not foster support for creative and cultural uses to be part of changing activity centres. <p>Should the table remain:</p> <ul style="list-style-type: none"> all Yarra Activity Centres should include the following descriptions in column 3 to: <i>Accommodate new housing and commercial growth, while protecting heritage fabric; foster support for creative and cultural uses to be part of changing activity centres</i> (this aligns with Strategy 66) Richmond – Bridge Road <ul style="list-style-type: none"> Future roles / strategic opportunities: <ul style="list-style-type: none"> Reference to schools, leisure centre and civic functions around the Richmond Town Hall. Increase residential development including medium- and high density while protecting heritage fabric Brunswick & Smith Streets: <ul style="list-style-type: none"> Attributes: Foster particularly live music venues (should be mentioned specifically) To be considered: Each is part of a network of centres (proximity Smith & Brunswick St), linked by NACs (Gertrude & Johnston St) and supported by surrounding mixed use areas Future Role/Strategic Opportunities: <ul style="list-style-type: none"> Support ability for creative/maker spaces to occupy spaces Increase public & social & affordable housing Support live music venues.

Housing choice

Maps and Tables	
Map 3	<p>Council is currently progressing Amendment C269 which is defining the boundaries of our Major Activity Centres. The boundaries included on Map 3 should reflect the outcomes of the Amendment once finalised.</p> <p>Use of term 'Regionally significant commercial land' is confusing. Key should also note these are Major Activity Centres if that is the case.</p> <p>This plan should also show Neighbourhood Activity Centres as it is labelled Precincts and Activity Centres.</p> <p>Delete reference to walkable catchment. The 800m walkable catchment does not reflect the more nuanced context of compact urban areas in the inner metro region. The inner region is characterised by low residential areas, many with heritage significance, abutting commercial areas or industrial areas. Yarra's approach to managing growth is set out in the Yarra Housing Strategy and the application of zones implemented to protect residential neighbourhoods and heritage areas in Yarra. Yarra is not relying on the established residential neighbourhoods to contribute substantially to housing growth, although some small-scale development will add to Yarra's housing supply over the next 15 year.</p> <p>A much more tailored approach is required, identifying locations within centres where growth is expected and managing the appropriateness of scale through policy and Design and Development Overlays.</p>
Table 11	<p><i>Major Activity Centres</i></p> <p>Support subject to the deletion of the text (crossed out) to reflect earlier comments.</p> <p>Major activity centres are suited to medium and higher density housing and mixed-use development. Substantial housing change opportunities may extend to a walkable catchment of 800 metres around the centre (depending on the local context) based on the 20-minute neighbourhood principle of locating housing close to jobs, services, amenities and public transport.</p> <p><i>Neighbourhood Activity Centres</i></p> <p>Support subject to the deletion of the text (crossed out) to reflect earlier comments.</p> <p>Some neighbourhood activity centres may be suitable for mixed-use medium- and higher-density housing, particularly when they are serviced by good public transport. Housing opportunities may also extend to a walkable catchment of 800 metres around the centre (depending on the local context) based on the 20-minute neighbourhood principle of locating housing close to jobs, services, amenities and public transport.</p> <p><i>Urban renewal</i></p> <p>Support subject to:</p> <ul style="list-style-type: none"> - updated text reflecting the significant planning that has occurred for both sites. - Reference to 'Amcor Site' be placed with 'Former Amcor Site'.

Integrated Transport

Maps, Figures and Tables	
Map 4	<p>The Strategic Cycling Corridors should be shown as existing and future. All other networks reflect existing infrastructure, whereas some of SCC do not yet exist (e.g. Bridge Rd).</p> <p>Gipps Street and Cremorne should be shown consistently across maps in the plan. In this map, they are missing the 'Enterprise Precinct' designation. (See comments on Map 2.)</p> <p>Unclear why the map shows the industrial / enterprise precincts but not the extent of activity centres. Important to show both.</p>
Figure 14	<p>This figure is based on how far people need to walk to access public transport. It appears that most of Yarra has very high access to public transport. More importantly for the inner metro region is the level of service/frequency. This figure should reflect level of service/frequency (e.g. train could be scored higher than bus) and population growth for different areas.</p> <p>This figure could also more clearly reflect the issue of poor orbital public transport options and appears to primarily consider access to the CBD. E.g. Burnley corridor is shown as having good access to public transport, however the only service available are east-west trams into CBD and no north-south public transport. The map could be improved to show these gaps more clearly.</p> <p>A methodology for this map would assist e.g. it is unclear why Burnley Station rates so low.</p>
Figure 15	<p>More detail could be shown about where the majority of trips are happening. The graphic shows trips into the Metro area / CBD, if possible further detail showing trips to key destinations/employment centres could be shown.</p>
Figure 16	<p>This figure should show links from Moreland and Darebin as they were noted in the preceding section in the report.</p> <p>This figure is difficult to understand.</p>
Map 5	<p>Consider this map could be combined with Map 4.</p> <p>If retained:</p> <ul style="list-style-type: none"> • The colouring of Gipps Street and Cremorne must be corrected, it is currently coloured industrial with no 'Enterprise Precinct' designation. • Bus corridors should be shown on Hoddle Street and the Eastern Freeway • Doncaster busway upgrades associated with North East link project should be noted. • See notes on Map 4 re Strategic Cycling Corridors.

Liveability

Maps, Figures and Tables	
Table 12	<p>Should separate out the Yarra River from other waterways in the Table. It is a highly significant landscape / biodiversity feature of the region.</p>
Map 6	<p>Should include:</p> <ul style="list-style-type: none"> • gaps in the existing regional network along the Yarra River • the Corroboree Tree in Burnley Oval

Maps, Figures and Tables

	<ul style="list-style-type: none"> World Heritage Site and Environs Area Identify Fitzroy and Collingwood as areas of special significance – they are the cradle of Aboriginal and Torres Strait Islander affairs in Victoria, birthplace of important Aboriginal organisation, centre for political activism and a meeting place <p>Mark extent of major and neighbourhood activity centres (rather than show with a dot) – they are important in terms of liveability</p> <p>Unclear what is meant by 'Yarra River Land'</p>
Text on page 93 & Figure 19	<p>Between the text in 'Open space and regional trails' & Figure 19, the figures are inconsistent e.g. <i>Inner Metro Region provides for an average of 44 square metres of public open space</i> and Fig 19 shows 46.1 m².</p> <p>Paragraph states <i>Yarra LGA provides 38 square metres</i> and Fig 19 shows 33.7m².</p>

Stronger Communities

Maps, Figures and Tables

Map 7.	Suggest some of the larger parks e.g. Yarra Bend Park with bushland and walking tracks, playing fields and golf courses are major recreational facilities.
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Sustainability and resilience

Maps, Figures and Tables

Figure 25	The tree canopy cover for Yarra is stated as 13.7% in 2014 and 14.8% in 2018. Council's Urban Forest Strategy states that the tree canopy cover measured from 2014 imagery was 17% (includes public and private land).
Map 8	<p>It would be useful to note the definition of 'Yarra River land' and refer to the (currently unendorsed) Yarra Strategy Plan.</p> <p>Be helpful to note the source of the data on the map.</p> <p>Council's <i>Urban Forest Strategy</i> identifies a few more vulnerable areas.</p>
Map 9	<p>Priority - Urban heat response is marked blue and covers the entire region. Needs to be clearer this means it's a priority for all land use planning / built form across the region to have new/additional urban heat responses. Priority – Expand tree canopy cover - The areas in Yarra indicated to expand urban tree canopy (teal colour) appear to be existing parkland and these are not prioritised in Yarra's <i>Urban Forest Strategy</i>. (See Page 59 of the Strategy for Council's priorities.)</p>

Appendices

Maps, Figures and Tables	
Appendix 01.	'Adaption Action Plans' should be 'Adaptation Action Plans'