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## **SUBMISSION TO PLAN MELBOURNE – METROPOLITAN PLANNING STRATEGY**

### **Introduction**

Victoria Walks congratulates the Victorian Government on preparing *Plan Melbourne*, which seems to give walking significantly more attention than previous planning and transport strategies.

Historically, walking has been overlooked as a mode of transport (Australian Government 2012). To the extent that it has been considered, in transport policy it has generally played second fiddle to cycling and in planning policy it has been an assumed outcome of increased density or better public transport.

Plan Melbourne presents a significant step forward in addressing walking specifically as a mode of transport in its own right.

Victoria Walks made a lengthy submission – our [Plan for a Walkable Melbourne](#) – in response to *Melbourne, Let's Talk About the Future*. This submission included:

- An explanation of why walking is important
- Discussion of current levels of walking and key trends
- Review of all the key policy measures required to make Melbourne more walkable and associated recommendations.

Some of the measures proposed in *Plan for a Walkable Melbourne* are adopted to varying degrees in *Plan Melbourne* and we commend the Government for that.

The issues covered in *Plan for a Walkable Melbourne* are not generally repeated in this submission. This submission reviews *Plan Melbourne* (the Plan) and generally suggests refinements to better implement the broader policy intent. It is divided into:

- Specific comments on particular clauses of the Plan.
- General comments where we perceive a gap in the Plan.

### **Background**

Victoria Walks is a walking health promotion body working to get more Victorians walking every day. Our vision is for vibrant, supportive and strong neighbourhoods and communities where people can and do choose to walk wherever possible.

Our cities, towns, neighbourhoods and urban areas have become largely automobile dependent and less walkable. This has contributed to the emergence of more sedentary lifestyles in which Victorians do not engage in the recommended levels of physical activity. Physical inactivity is a significant factor in the dramatic rise in the levels of obesity and preventable diseases such as Type II diabetes and cardiovascular disease.

Walking-friendly neighbourhoods and urban spaces are essential to encourage and enable people to walk. Walking is associated with positive health outcomes, improved fitness and better physical, social and mental health. Making towns, cities and suburbs more walkable has many health, environmental and economic benefits.

## Specific comments

### Introduction

Under '20-minute neighbourhoods' two select examples of pedestrian oriented design are provided, but these are the exception rather than the rule. This needs to be more broadly applied to the growth areas.

### Recommendation

1. Amend the text under '20-minute neighbourhoods' to read "Some newer suburbs in Melbourne's growth areas (such as Selandra Rise in Casey and Riverwalk Town Centre in Wyndham) have been planned to be pedestrian-friendly, active communities. Pedestrian oriented design needs to be more broadly applied in the growth areas."

### Direction 1.1 – city structure

Victoria Walks supports the focus on activity centres. However the Plan should not be anticipating the development of new centres that are not based on transit oriented design principles. All new centres should be transit oriented – we should not be planning for second best. Activity centres must also be designed to be walkable.

### Recommendations

2. Amend the last paragraph under initiative 1.1.1 to read:

"New Activity Centres should:

- be well-served by a range of transport options (including public transport), ~~with priority given to new centres that are~~ and developed based on transit and pedestrian oriented development principles."

### Direction 1.6 – investment in transit-oriented development

Generally, Victoria Walks supports this direction. It is important to realise the opportunities that exist or will emerge to intensify development around higher order public transport such as train stations and the tram network.

Notwithstanding this support, some elements of initiative 1.6.2 seem to conflict with the broader direction. Of particular concern is the final bullet point, which anticipates freeway oriented 'business parks'. This sounds like a throwback to the antiquated planning of the 1970s and 1980s. It is important to make a clear distinction between office and retail

development, which should be directed to pedestrian and transit oriented activity centres (at whatever order of the centres hierarchy) and industrial development, which can be designed around road access.

We note also in relation to the central city to airport corridor, non-industrial employment expansion should be contingent on the rail link to the airport.

### Recommendations

3. Amend the last two bullets to read

- Central City to airport corridor ~~to leverage off this emerging job corridor and take advantage of~~ including office and retail development in new or enhanced centres served by a possible future airport link
- suitable ~~business park~~ industrial development opportunities or existing centres that can take advantage of the East West Link, the M80 Upgrade, the Outer Metropolitan Ring Road and EastLink.

### **How we will accommodate growth (p54)**

Figures 7 and 8 illustrate how Melbourne's residential growth will be allocated, in a business as usual scenario (between 2004 and 2012 about 40% of new housing was built in the growth areas [figure 10] and Victoria in Future projects that to continue). It is not clear whether this is also the intended policy outcome, or whether it is just a reflection of the status quo, that policy may or may not seek to diverge from. How will the increase in density in the growth areas, from 15 to 18 dwellings per ha, affect this picture?

### Recommendations

4. Amend the text to clarify whether Figures 7 and 8 represent a policy objective, the status quo or both.

### **Direction 2.1 – plan for expected housing needs**

Generally, Victoria Walks supports initiative 2.1.3 and the increase in growth area density from 15 to 18 dwellings per ha. Although this is still relatively low density and it could be argued that we should be aiming higher, it is at least a step in the right direction. We note however that to be successful, higher density cannot be based on the traditional model of selling land or conventional house and land packages. Higher density housing needs to be comprehensively designed and built with good access to services in centres with pedestrian oriented design.

Victoria Walks supports initiative 2.1.4, including a review of design and amenity of apartments. It is important to maintain the quality of higher density development.

### Recommendations

5. Amend initiative 2.1.3 to read:

“Amend the Precinct Structure Planning Guidelines to require the delivery of an average of 18 dwellings per hectare in new growth areas. This can be achieved by providing a variety of lot sizes and housing types across a precinct, including lower density, standard lots and higher density, comprehensively designed housing in areas with good access to services and pedestrian oriented design of high amenity.”

6. Retain initiative 2.1.4.

### **Direction 3.1 – transport to support the central city**

Victoria Walks supports initiative 3.1.2 – move towards a metro-style rail system, starting with Melbourne Metro. It is important to continually improve the quality and capacity of the core public transport system. Walking is the primary method of accessing public transport.

The proposed timing of Melbourne Metro, commencing in the medium term (2017-2025) and not completed until after this period, is of significant concern. The Network Development Plan for Metropolitan Rail seems to envisage construction within the next ten years (PTV 2012). If Plan Melbourne represents a step away from the commitments in the Network Development Plan this would be a major concern. Plan Melbourne should envisage completion of the Melbourne Metro project in the medium term given its pivotal role in allowing other enhancements to proceed.

The second and third bullet points under initiative 3.1.2 appear to be alternate or duplicate policies – one should be deleted.

Victoria Walks generally supports initiative 3.1.3, improving tram travel times, capacity and reliability. Nonetheless the wording of the bullet point relating to Fishermans Bend is very weak. Fishermans Bend is being planned on the basis that a tram line will be provided and the Government should commit to providing one, not just considering it.

Victoria Walks strongly supports initiative 3.1.5, supporting walking and cycling in central Melbourne. It would be helpful to refine some elements of this initiative to better meet this objective. For example the bullet point relating to speed should be separated from the walking specific elements because it is also of significant benefit to cyclists. The focus on pedestrian safety should be broadened to consider the convenience and amenity of walking. Within the central city essentially all streets are important pedestrian routes, so the focus needs to be broadened to consider walking routes to the central city, not just within it.

### Recommendations

7. Plan for completion of Melbourne Metro in the medium term rather than the long term.
8. Delete the second bullet under initiative 3.1.2.
9. Otherwise retain initiative 3.1.2.
10. Amend the 5<sup>th</sup> bullet point under initiative 3.1.3 to read:  

“Develop a new tramline to Fishermans Bend and consider extending tramlines, where needed, to other support new development sites around inner Melbourne and in clusters including ~~determining the feasibility and~~ assessing strategic options for improved public transport to E-Gate.”
11. Amend the third paragraph under initiative 3.1.4 to read:  

“...We will work with inner-city local governments to improve the safety, amenity and convenience of ~~en~~ key walking routes to and around the Central City and inner Melbourne.
12. Amend the first bullet point under initiative 3.1.5 to read:

- “Identify key pedestrian routes in and to the Central City and improve pedestrian crossing times, footpaths and general amenity.
- Implement the new guidelines for 40 km/h speed limits in appropriate areas to improve safety and amenity for pedestrians and cyclists~~pedestrian zones in areas where there is a high risk to pedestrian safety.~~”

### **Direction 3.3 – improve transport in newer suburbs**

There is no reference to either walking or cycling in this section of the Plan. In relation to growth areas planning cycling is belatedly mentioned in initiative 3.4.2, but walking in the growth areas is not mentioned until initiative 4.3.1. Like other types of transport infrastructure, walking has been erratically served in growth areas planning and there are significant walking infrastructure issues that are specific to outer Melbourne. For example a study of bus stops in outer Melbourne found more than 1,600 were not connected to the footpath network. The report estimated it would cost \$6.4 million to connect priority bus stops (RACV 2009). Therefore, in addition to the need to provide for walking in precinct structure planning (which is recognised by the Plan) there is also an infrastructure backlog that needs to be addressed.

Victoria Walks does not support the emphasis on Park and Ride facilities in this section. Park and Ride is very much a second best option compared to having passengers walk, cycle or bus to the train station. Park and Ride facilities:

- Often compromise the amenity of the train station environs for pedestrians and communicate a message that ‘this is a place to drive to’
- Require funding that could be directed to other public purposes
- Require land that could otherwise be dedicated to transit oriented development
- Undermine patronage on bus services to the station/centre
- Potentially increase traffic on roads to the station.

Some Park and Ride facilities may be appropriate but they should not be a focus for growth areas planning.

Victoria Walks supports the reservation of land for future rail extensions and stations in the growth areas, but this should commence in the short term, not the medium term, if it is not already underway. The growth areas are already being planned in detail.

### **Recommendations**

13. Add a new initiative that recognises the need to:

- a) Address walking (and perhaps cycling) infrastructure gaps in the growth areas and outer suburbs; and
- b) Provide for walking in growth areas planning (which might be a relocation of measures currently located under initiatives 3.4.2 and 4.3.1).

14. Delete the fourth paragraph and third bullet point under initiative 3.3.2.

15. Move the medium term bullet point under initiative 3.3.2 to the short term.

### **Direction 3.4 – improve local travel options to increase social and economic participation**

Victoria Walks strongly supports initiative 3.4.1 – make neighbourhoods pedestrian friendly.

The Plan should acknowledge that different groups have different needs and all should be provided for in an inclusive society.

To give effect to the policy intent, as described in the discussion, a bullet that supports pedestrian movement in arterial road management should be added.

#### Recommendation

16. Add the following discussion or similar:

“Different groups have different walking needs and all should be provided for in an inclusive society.

Walking is by far the most significant form of exercise for seniors and becomes increasingly important to their personal mobility. Older seniors may lose access to other forms of mobility such as driving. For those aged 80+, around 80% of walking trips are for shopping or personal business. It is important to create an environment that supports seniors walking to access public transport and local services.

When walking, the risk of falling is as significant for seniors as the risk of traffic. This requires particular attention to the surface quality of footpaths and crossings, to ensure that trip hazards are minimised.

Seniors are particularly concerned by unpredictable hazards such as poorly controlled dogs and cyclists on footpaths or shared paths (Garrard 2013).

People with vision or mobility impairment have specific needs for supporting infrastructure to provide physical access (eg ramps) or assist navigation. Those with low vision have a relatively high risk of collision with a vehicle, including bicycles (around 20% of collisions) and collisions on the footpath (MUARC 2012).

This emphasises the need for dog control and suggests a need for separated paths or on-road cycle paths to promote cycling for transport, where large volumes of pedestrians or significant numbers of commuter cyclists can be expected.

Children and their parents need footpaths with pram ramps, safe crossing points and/or reduced vehicle speeds on primary routes to key destinations such as schools.”

17. Add the following bullet under initiative 3.4.1 (short term):

- “Prioritise pedestrian networks in management of the road network, including arterial roads.  
VicRoads”

## **Direction 4.2 – protect Melbourne and its suburbs from inappropriate development**

Victoria Walks supports initiative 4.2.4 – an interactive liveability index. This should be extended to a system of targets for metropolitan planning and development.

### Recommendations

18. Extend the liveability index to also include targets for liveability measures.
19. Include indicator measures and mode share targets for walking. An example of possible targets would be to increase walking from 3.4% of journey to work in 2011 to 7% by 2021, and/or 60% of trips between 0.4 and 0.99km by 2021.
20. Include an indicator and target for walking to school, as a measure of success for the Metropolitan Planning Strategy. A possible target would be 35% of primary school students and 25% of secondary school students walking to school by 2021.

## **Direction 4.3 – create neighbourhoods and communities that support healthy lifestyles**

We generally support this direction, particularly initiative 4.3.1 – implement design guidelines to promote walking and cycling neighbourhoods for healthy living. We look forward to working with the Government in implementing this initiative.

### Recommendations

21. Retain all elements of Direction 4.3.

## **Direction 4.4 – plan for future social infrastructure**

It is very encouraging to see the Government recognise that decisions about where to locate schools, hospitals and other social infrastructure “have too often been driven by readily available or cheap land and have ignored the long-term impacts of less convenient locations and longer travel times.”

We support this direction but recommend that it be strengthened to make social agencies more accountable for their location decisions.

### Recommendations

22. Add new bullets to initiative 4.4.2 as follows:
  - “Ensure that schooling is made available on a local basis, within walkable catchments, consistent with broader urban planning policy.”  
Department of Education and Early Childhood Development
  - Ensure new private or public school development occurs in walkable catchments within the urban area – not in Green Wedge areas outside the Urban Growth Boundary.”  
Department of Transport, Planning and Local Infrastructure (Planning) and  
Department of Education and Early Childhood Development

## **Direction 4.5 – make our city greener**

Victoria Walks supports initiative 4.5.3, in particular the first bullet, which recognises the need for planting of canopy trees and removal of powerlines along priority roads.

### Recommendations

23. Retain initiative 4.5.3

## **Direction 4.8 – achieve and promote design excellence**

Victoria Walks supports direction 4.8. Excellence in design is critical in enhancing the amenity of the urban environment, which is in turn critical to the enjoyment of walking.

### Recommendations

24. Retain direction 4.8

## **Section 6 – peri-urban areas**

The Plan seems somewhat unclear on the policy intent for peri-urban areas. In part, the focus of the Plan seems to be ‘protecting’ and controlling development in peri-urban areas. At other points they are promoted as an alternative location for metropolitan growth.

The Plan does not accurately communicate the issues of peri-urban areas. An example is the statement:

“With the right support and long-term planning, towns closer to Melbourne in the peri-urban area, and especially along the regional transport corridors, can also continue to provide affordable options for living and working locally.”

The reality is that residents of peri-urban towns do not work locally. In fact, the defining characteristic of peri-urban towns is that people work somewhere else.

An example is the town of Romsey in the Macedon Ranges Shire. More than 55% of employed people living in Romsey work in metropolitan Melbourne. In total, more than 70% of employed residents undertake a lengthy commute to work, not just beyond Romsey, but outside the whole of the Macedon Ranges Shire. This commute is overwhelmingly undertaken by car – only 1% of workers walk to work and only 3% use public transport for part of their journey (MRSC 2009).

Peri-urban areas may have other issues such as landscape values, heritage, tourism, or bushfire risk, which mean it is necessary to control development in particular areas. But that does not mean that other areas should be seen as good locations to skip the urban growth boundary and cater to an overspill of metropolitan growth. There will be exceptions – for example some towns offer opportunities for urban development immediately adjacent to railway stations.

Peri-urban development is fundamentally unsustainable. Expanding peri-urban towns is not preferable to metropolitan development. The Plan should be clear on this. The Plan should also clearly distinguish peri-urban areas from genuinely rural or regional areas, which have very different characteristics, where growth should be supported and facilitated.

## Recommendations

25. Re-orient the discussion of peri-urban areas to:

- a) Note the commuting characteristics of peri-urban areas
- b) Clearly distinguish them from regional areas
- c) Establish a clear policy of restricting growth in peri-urban areas, except where specific opportunities arise, such as land adjacent to railway stations.

26. Amend the 'solutions' on page 135:

"Identify a pipeline of new rural village style developments to attract growth out of Melbourne and into ~~the peri-urban area and~~ regional Victoria."

27. Amend the first bullet on page 137:

"Work to provide settlement options in a broad range of ~~peri-urban and~~ regional towns, to attract population growth away from Melbourne.

### **Direction 6.1 – deliver a permanent boundary around Melbourne**

Victoria Walks supports the apparent intent of direction 6.1. Containing the growth of the metropolitan area is more likely to result in consolidated development that encourages walking as part of everyday life.

Notwithstanding this support, we have significant concerns about the suggested approach, which seems likely to backfire and undermine the apparent intent of the direction. Firstly, it is difficult to envisage how it would be possible to deliver a permanent boundary, as any government decision could be overturned by a subsequent government. In fact, this appears to be the historical practice in managing the growth boundary.

Secondly, the practical effect of initiative 6.1.1 would seem likely to be an expansion of the urban growth boundary (by whatever name), to reach the 'permanent' line.

The strongest thing the Government could do to affirm the role of the urban growth boundary would be to commit to not altering it during the life of the Plan (2013-2050). Perhaps even more effective would be genuine staging of growth areas to ensure that the land supply within them meets demand for the full period envisaged. Without such staging, it is likely that the land with the growth areas will be developed earlier than anticipated, resulting in pressure to extend the boundary.

## Recommendations

28. Review the approach to Direction 1.1, based on a commitment to not review or alter the current urban growth boundary before 2050.

29. Introduce genuine staging of growth areas to ensure that the land supply within them is not exhausted prior to 2050.

## **Direction 7.4 – open up new funding sources**

Victoria Walks supports direction 7.4. Governments at all levels need to be able to access funding to provide the necessary infrastructure to support growth. This funding should be sourced directly from the increase in land value associated with development, particularly the rezoning of land.

### Recommendations

30. Retain Direction 7.4 and state specifically the need to source financial contributions based on the increase in land value associated with the rezoning of land.

## **General comments and gaps**

### **Car parking**

Car parking is a key driver of mode choice and therefore rates of walking, as well as cycling and public transport use (Donovan and Munro 2013; Krizek, Forsyth and Baum 2009). It is also one of the transport elements most strongly influenced by the planning system. Yet parking is seldom mentioned in the Plan and does not appear to be specifically referred to in any of the actions.

Direction 4.4 notes that “onerous car parking requirements” are a problem for the public sector in providing social infrastructure (is there any reason to believe they are less onerous for the private sector?), but there is no follow up action.

There is some indication that car parking may be addressed in relation to medium density housing under initiative 2.4.1. In our view however it is the car parking requirements for office and retail development that are most problematic – they encourage driving to centres; make centres less pedestrian friendly; make development in existing centres difficult and/or expensive; and thereby promote out-of-centre development.

There is some intimation that a review of car parking controls might be considered under initiative 7.1.5, but this is not clear.

A fundamental review of car parking requirements is needed to consider car parking within the broader policy context of promoting transit and pedestrian oriented centres.

### Recommendations

31. Add the following to the discussion under initiative 1.5.3:

“There is an opportunity to further improve the competitiveness of activity centres and promote pedestrian oriented design by reviewing the need for minimum car parking requirements in activity centres.”

32. Amend the third bullet point under initiative 1.5.3:

“Review planning controls, including car parking controls, in Activity Centres and streamline them where possible.”

33. Add the following bullet point under initiative 7.1.5:

“Undertake a fundamental review of planning scheme car parking requirements, including consideration of removing car parking minimum requirements, applying maximum parking limitations in certain situations.”

### **Protecting industrial and commercial land supply**

The Plan rightly stresses the need to provide sufficient commercial and industrial land to meet employment needs. It may not do enough to ensure this is delivered.

The changes under Zone Reform provide greater opportunities and flexibility for business location. This does mean, however, that the sufficiency of industrial and commercial land supply is more difficult to predict and that land identified for one type of use may come to be occupied largely by another. Commercial 1 Zone land may be occupied by housing. Industrial land may be occupied by office or retail development. Generally however this type of development requires a planning permit and therefore remains within the control of local authorities.

Victoria Walks concern is that the new flexibility needs to be managed to ensure that office and retail development is predominantly located in transit and pedestrian oriented activity centres, with the added benefit of minimising pressure (including price pressure) on industrial land supply. The risk is a dissipation of office and retail development across the urban landscape, making it very difficult to plan for walking, cycling and public transport provision. Key destinations need to remain concentrated in centres.

The Plan should stress that the flexibility afforded by Zone Reform needs to be managed and directed to ensure business is appropriately located and commercial and industrial land supply is maintained.

#### Recommendations

34. Add the following bullet to initiative 1.2.2 (or similar):

“Control retail and office development on industrially zoned land to ensure this development is predominantly located in transit and pedestrian oriented activity centres and maintain industrial land supply.  
Local authorities; Department of Transport, Planning and Local Infrastructure (Planning)”

35. Introduce a similar policy for commercial zones.

### **Implementation of residential consolidation**

Residential consolidation around activity centres and public transport is a critical element of the Plan. However apart from inner city redevelopment areas and major centres, the mechanism for ensuring that these areas are defined and translated into changes in planning controls are not entirely clear. It seems that it will largely be left to local councils to determine areas for consolidation. There is an important role for state leadership as well as local input.

#### Recommendations

36. Review mechanisms for ensuring that areas for residential consolidation are identified and translated into planning scheme controls.

## Walking Strategy

Victoria and/or Melbourne has a strategy for cycling, a strategy for freight, a strategy for trains and strategies on the way for trams and buses (PTV 2012; State of Victoria 2012 and 2013). Yet there is no apparent strategy for walking.

The Department of Transport prepared the *Pedestrian Access Strategy: A strategy to increase walking for transport in Victoria*, in 2010. The Strategy identifies key directions and priority actions to promote walking. However, the Strategy is no longer on the Department's website and it appears that it is not supported by the current government.

The absence of a strategy or policy for walking is of serious concern because walking needs to be considered as a transport in its own right. A Walking Strategy for Victoria should be prepared, in conjunction with a metropolitan focused strategy. It is essential that comprehensive walking specific policy is available to help implement Metropolitan Planning Strategy objectives and align with other government priorities.

In addition to the policy direction provided by a strategy, the process of developing it is likely to further engage key agencies, such as Public Transport Victoria (PTV), in consideration of walking.

Walking is a significant recreational pursuit. Both transport and recreation are important types of walking, but they require somewhat different policy responses. A Walking Strategy should address both recreational walking and walking for transport. Exactly where this might be flagged as an action in the Plan is open to debate, but it would be appropriate under Direction 4.3.

## Recommendations

37. Prepare a metropolitan Walking Strategy, in association with a Walking Strategy for Victoria.

## Conclusions

Victoria Walks once again congratulates the Victorian Government on preparing *Plan Melbourne*, which presents a significant step forward in addressing walking specifically as a mode of transport in its own right.

This submission identifies aspects that Victoria Walks particularly support and areas where we see room for further improvement. These include:

- Acknowledging the different walking needs of different parts of the community, including seniors, people with a disability, children and their parents.
- Ensuring that office and retail development is predominantly located in transit and pedestrian oriented activity centres
- Extending the proposed liveability index to include targets, including walking related targets.
- Undertaking a fundamental review of the approach to car parking.

- Reconsidering the approach to the peri-urban areas and the urban growth boundary.
- Strengthened consideration of walking in growth areas and outer suburbs.
- Planning for completion of Melbourne Metro in the medium term rather than the long term.

If you have any queries regarding this submission please contact Duane Burt, Senior Walkable Communities Advisor on [dburt@victoriawalks.org.au](mailto:dburt@victoriawalks.org.au) or 9662 3975.

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