Submission from the Northern Alliance for Greenhouse Action (NAGA)

# The Northern Alliance for Greenhouse Action (NAGA) welcomes this opportunity to comment on the Victorian Governments refresh of Plan Melbourne.

# NAGA is a network of nine northern metropolitan councils operating across metropolitan region of Melbourne working to achieve significant climate change mitigation and abatement actions by delivering effective programs and leveraging local government, community and business action. Our members include Banyule City Council, Darebin City Council, Hume City Council, Manningham City Council, City of Melbourne, Moreland City Council, the Moreland Energy Foundation, the Shire of Nillumbik, City of Whittlesea and the City of Yarra.

# We particularly welcome where the discussion paper focuses on climate change and sustainability, acknowledging the inadequate consideration of these issues in the current Plan Melbourne. Our submission concentrates on these elements in section 6. We also commend the aspirations of the Victorian Government as stated in the discussion paper to be a world leader in sustainability and social equity.

# Chapter 2: Growth, challenges, fundamental principles and key concepts

## The discussion paper includes the option (option 5, page 16) that Plan Melbourne better define the key opportunities and challenges for developing Melbourne and outlines some key points for considerations in Box 1. *Are there any other opportunities or challenges that we should be aware of?*

|  |
| --- |
| See Question 8 for commentary on strategic principles |

## The discussion paper includes the option (option 6, page 18) that the United Nations Sustainable Development Goals be included in Plan Melbourne 2016. *Do you agree with this idea? If so, how should the goals be incorporated into Plan Melbourne 2016? Choose one option:*

Strongly agree

***Please explain your response:***

|  |
| --- |
| We strongly support inclusion of the United Nations Sustainable Development Goals in Plan Melbourne 2016. It is unlikely that any of the new goals will be in conflict with the existing goals and principles of Plan Melbourne 2016 and would be important symbolically and strategically. We suggest that as well as their inclusion, linkages are clearly made between the United Nations Sustainable Development Goals and the Plan Melbourne 2016 principles. |

## The discussion paper includes the option (option 7, page 18) to lock down the existing urban growth boundary and modify the action (i.e. the action under Initiative 6.1.1.1 in Plan Melbourne 2014) to reflect this. *Do you agree that there should be a permanent urban growth boundary based on the existing boundary? Choose one option:*

Strongly Agree

## The discussion paper includes the option (option 8, page 18) that Plan Melbourne 2016 should more clearly articulate the values of green wedge and peri- urban areas to be protected and safeguarded. *How can Plan Melbourne 2016 better articulate the values of green wedge and peri-urban areas?*

|  |
| --- |
| We support the recommendations of the Ministerial Advisory Committee (MAC) that Plan Melbourne 2016 should better articulate the intrinsic values of the green wedge and peri-urban areas. These values should include the intrinsic values of biodiversity, as well as all of the ecosystem services that the green wedge area provides to the broader community. |

## The discussion paper includes the option (option 9, page 18) to remove the concept of an Integrated Economic Triangle and replace it with a high-level 2050 concept map for Melbourne (i.e. a map that shows the Expanded Central City, National Employment Clusters, Metropolitan Activity Centres, State-Significant Industrial Precincts, Transport Gateways, Health and Education Precincts and Urban Renewal Precincts). *What elements should be included in a 2050 concept map for Melbourne?*

|  |
| --- |
| We notionally support the replacement of the Integrated Economic Triangle (IET) with a 2050 map, acknowledging that the definition of the IET is largely based on outer freeway and major highway networks and does not make for meaningful planning. However, little information is provided in the discussion paper as to what this 2050 map will look like and be based on. |

## The discussion paper includes the option (option 10, page 18) that the concept of Melbourne as a polycentric city (i.e. a city with many centres) with 20-minute neighbourhoods (i.e. the ability to meet your everyday (non-work) needs locally, primarily within a 20-minute walk) be better defined. *Do the definitions adequately clarify the concepts? Choose one option:*

Agree

**Please explain your response:**

|  |
| --- |
| We support the updated definition of the 20 minute neighbourhood to be defined as “the ability to meet your everyday (non-work) needs locally, primarily within a 20-minute walk”. We acknowledge the many environmental and social benefits of planning around a 20 minute city idea. |

## The discussion paper includes options (options 11-17, pages 23 to 27) that identify housing, climate change, people place and identity and partnerships with local government as key concepts that need to be incorporated into Plan Melbourne 2016. *Do you support the inclusion of these as key concepts in Plan Melbourne 2016?*

Strongly Agree

**Please explain your response:**

|  |
| --- |
| **Housing**   * Whilst we support the need to strengthen housing affordability and choice, it is important that housing quality is also strengthened. This reflects that much of the affordable housing built to date often lacks good environmentally sustainable design (ESD) qualities, which results in higher costs of living. Affordable housing should be a concept that is not just framed around the purchase price, mortgage repayments and rental costs, but the costs of use, particularly around water, energy use and transport options. This recognises that many home owners experience higher mortgage stress as a result of poorly performing housing and subsequent high utility bills. Put simply, good quality houses are cheaper to keep warm in winter and cool in summer.   NAGA is a signatory to the One Million Homes alliance whose goal is to ensure “that Victoria’s housing stock meets an average 5-star equivalent and 100 litre/person/day standard by 2025” . This goal can best be met through the following four action areas:  o Improving standards to create incentives for homeowners and landlords to invest;  o Facilitating accessible and affordable finance to enable homeowners and landlords to meet standards;  o Raising public awareness about the benefits of efficiency and how to access information and services;  o Funding targeted retrofit and education programs for households experiencing financial and energy hardship.  We recommend that Plan Melbourne 2016 better reflects the goal of the 100 Million Homes alliance and broadens the concept of affordability and choice to include quality.  **Climate Change**  • We strongly support and welcome the inclusion of climate change as a key concept in Plan Melbourne 2016. Climate change is a cross cutting issue that impacts upon almost every aspect of Plan Melbourne 2016 and so should be comprehensively addressed.  • We support the need to identify the challenges of climate change for Melbourne’s development and define how the city can best mitigate against, adapt and respond to its projected impacts. NAGA together with the other greenhouse alliances has undertaken significant work in mitigation and adaptation over the past decade that would be useful to Plan Melbourne 2016. For example, NAGA has recently undertaken a regional integrated vulnerability assessment and subsequent adaptation plan Adaptation in the North. This project, funded through the State Government, has identified key vulnerabilities and actions from climate change across the northern metropolitan area of Melbourne.  **People place and identity**  • We support the inclusion of this concept in Plan Melbourne 2016, and better recognition of Aboriginal values and perspectives to the planning of our built and natural environments.  • We further recommend recognising the importance of this concept in responding to climate change, recognising that social connectivity and linking people to place is fundamental to climate resilience. Planning has an important role to play in building and retaining this social connectivity and connection to place, and empowering individuals  • The experiences of Black Saturday has taught Melbourne much in terms of how climatic events can impact a regions sense of place and lead to a range of unforeseen planning outcomes. For example, reactive responses to Black Saturday bushfires led to many rogue instances of land clearing and ongoing community wide trauma. As the impacts of climate change place greater stress on Melbourne, it is important that planning can seek to alleviate and mitigate the potential psychological impacts of climate change on the cities people. In academia, these types of impacts are referred to as ‘solastalgia’, a term that describes the distress that is produced by environmental change impacting on people while they are directly connected to their home environment . Although a complex planning issue to resolve, Plan Melbourne should nonetheless identify this as an important risk to the community to be managed that is not as tangible as physical impacts.  **Partnerships with local government**  • We agree with the need to recognise and reinforce the importance of partnership with local government in sub-regional planning and Plan Melbourne 2016’s implementation.  • An ongoing issue for state and local government partnerships is the lack of clarity on roles and responsibilities for responding to climate change. Although not likely to be resolved within Plan Melbourne 2016, high level articulations of roles and responsibilities in this regard is important. |

## *Any other comments about chapter 2* (growth, challenges, fundamental principles and key concepts)?

|  |
| --- |
| • There is currently no strong representation of the idea of climate resilience or adaptive capacity in the strategic principles. The concept of environmental resilience is framed around the protection and resilience of natural assets, whereas resilience is a broader concept that should be better reflected. The global 100 Resilient Cities program, of which metropolitan Melbourne is a member, defines urban resilience as “the capacity of individuals, communities, institutions, businesses, and systems within a city to survive, adapt, and grow no matter what kinds of chronic stresses and acute shocks they experience.” Within this a key aspect is adapting to climate change, which needs to be more strongly reflected in the principles underpinning Melbourne’s primary planning strategy.  • Similarly, we believe it is important to capture the idea of resilience in the overall vision for the city. The current vision does not reflect this: “Melbourne will be a global city of opportunity and choice”. Broadening the scope of this vision to include notions of resilience will strengthen planning guidance for the kind of city we want Melbourne to be, being reflected in the core elements of Plan Melbourne 2016.  • Although considered to be out of scope of the refresh, the five key strategies for achieving this vision are also far too broad and meaningless to be useful. For example, protecting the suburbs is highly ambiguous, and begs the question, protecting from what? We support a broader review of these strategies. |

# Chapter 4: A more connected Melbourne

## *Any other comments about chapter 4* (a more connected Melbourne)?

|  |
| --- |
| • NAGA agrees with the framing statement need for more adaptive transport planning, and that this adaptive capacity should reflect potential social, technological and environmental changes over the next 35 years. To this end, we would support recognition of the impact of climatic events, such as heatwaves, bushfires, flooding and extreme storms upon transport infrastructure throughout the state. NAGA’s own regional vulnerability assessment has identified vulnerable links in our transport system in northern metropolitan Melbourne, and what failure of those links would mean for people and the economy.  • NAGA recognises that to achieve many of the objectives of the 20 minute city there needs to be a dramatic increase in funding for cycling and walking infrastructure. There is a clear need for planning guidelines to promote cycling infrastructure within cities, between cities and in catchment areas for increasing rail patronage. In addition, there are many best practice examples across the world that offer creative solutions to some of the same transport problems faced by greater Melbourne. For example, the London Play Streets project, where each month traffic is blocked off for three hours in select streets and and is opened for pedestrian use .  • In addition to the promotion of cycling and pedestrian infrastructure, there should be greater emphasis on public transport infrastructure, recognising that the past decades have focussed heavily on roads and relying on car and truck based transport. |

# Chapter 6: A more resilient and environmentally sustainable Melbourne

## The discussion paper includes the option (option 46, page 69) to introduce Strategic Environmental Principles in Plan Melbourne 2016 to guide implementation of environment, climate change and water initiatives. *Do you agree with the inclusion of Strategic Environmental Principles in Plan Melbourne 2016?* *Choose one option:*

Agree

***Why?***

|  |
| --- |
| • NAGA supports inclusion of the Strategic Environmental Principles in Box 3 with the following additions/alterations.  • NAGA recommends greater emphasis on Integrated Water Cycle Management (IWCM) in the principle relating to “Optimise water and energy efficiency, and waste minimisation and recovery through the planning system to help achieve and more sustainable city”. IWCM is a more holistic and strategic approach to water efficiency than Water Sensitive Urban Design (WSUD), recycled stormwater and treated wastewater. It is recommended that IWCM be incorporated into the description of this principle.  • The principle of “enhance the community’s access to nature across our urban areas, increase recognition of our natural capital, better protect state significant biodiversity and maintain the productive agriculture and landscapes that make Melbourne distinctive” could be separated into two separate principles focussing on; i) natural capital and biodiversity and ii) productive agriculture. Maintaining productive agriculture can sometimes be a conflicting objective to better protection of natural capital and biodiversity and vice versa. By separating out these principles helps to properly consider them against each other and prevent any one aspect from being diluted.  • NAGA recommends a strategic principle that promotes a strengthening of the city’s food economy. Climate change will affect regional food security through prolonged droughts and sudden extreme events including bushfires, on top of existing pressures of urban growth and population pressures and rising energy costs. An analysis of Victoria’s food supply chain found that there are significant food security risks in the region for the future, in particular to the provision of critical and non-exchangeable foods such as fruit and vegetables . A key part of building resilience to these future food security risks is to strengthen and diversify the regional food economy; food that is grown and processed locally and sold primarily for local or regional markets. Urban and peri urban food production facilitates opportunities for local management of harvested rainwater, waste water and nutrient waste. Also, promoting local food reduces energy and transport demand, builds community and social cohesion, creates local employment and can also help to reduce other climate change risks such as heatwaves and flooding. NAGA advocates for better recognition of urban food production in the State Planning Policy Framework. |

## The discussion paper includes the option (option 47, page 72) to review policy and hazard management planning tools (such as overlays) to ensure the planning system responds to climate change challenges. *Do you agree with this idea? Choose one option:*

Strongly Agree

***Why?***

|  |
| --- |
| • NAGA supports the reintroduction of the MAC 2013 Direction 5.1 “Reduce the consequences of extreme climate events and related environmental risks”. However, we suggest that the wording of this direction recognises the changing nature of risks as a result of climate change. This could include words such as “increasing frequency and severity”. This would be in line with CSIRO projections for the region.  Better information and guidance for climate change hazards  • NAGA strongly agrees with a review of policy and hazard management planning tools (such as overlays) to ensure the planning system responds to climate change challenges and an update to hazard mapping based on the best available climate science. |

## The discussion paper includes options (options 48 and 49, page72) to update hazard mapping to promote resilience and avoid unacceptable risk, and update periodically the planning system and supporting legislative and policy frameworks to reflect best available climate change science and data. *Do you have any comments on these options?*

|  |
| --- |
| • NAGA also supports periodic reviews of the legislative and policy framework to incorporate best available climate science and data.  • As identified above, it is important that planning policy recognises the changing risk profiles associated with climate change impacts. Planning and preparing for future climate changes requires thinking about the lifetimes of different decisions or what is otherwise known as decision timeframes. Many of the decisions made on a daily basis by local governments have consequences that range from the short term to decadal. Thus it is important that decisions that have a long lifetime (such as the siting of a new housing estate) consider the projected climate changes for that region, not just the current climatic conditions.  • NAGA recommends considering the development of an urban heat vulnerability overlay as a form of hazard mapping overlay for new developments, to ensure that densification does not lead to an increase in urban heat. |

## The discussion paper includes the option (option 50, page 73) to incorporate natural hazard management criteria into Victorian planning schemes to improve planning in areas exposed to climate change and environmental risks. *Do you agree with this idea? Choose one option:*

Strongly Agree

***Why?***

|  |
| --- |
| • NAGA supports incorporating natural hazard management criteria into Victorian planning schemes to improve planning in areas exposed to climate change and environmental risks.  • The current criteria do not reflect the changing nature of climate change risks, and should seek to better incorporate climate change projections into the criteria.  • As mentioned above, the assessment of urban heat should be strengthened to ensure planning decisions seek to alleviate, not exacerbate urban heat. |

## The discussion paper includes the option (option 51, page 75) to investigate consideration of climate change risks in infrastructure planning in the land use planning system, including consideration of an ‘infrastructure resilience test’. *Do you agree that a more structured approach to consideration of climate change risks in infrastructure planning has merit? Choose one option:*

Strongly Agree

***Why?***

|  |
| --- |
| • NAGA strongly supports an infrastructure resilience assessment test for new major capital works, but emphasise that this test should be as comprehensive as possible. This could be achieved by adopting the Australian Standard “Climate change adaptation for settlements and infrastructure” as part of the approval process. This could be a standalone requirement or incorporated into environmental impact assessments. This would allow for major projects to be independently assessed for consideration of climate change impacts and transparent and open to public scrutiny.  • In addition, NAGA also recommends that Plan Melbourne 2016 supports resilience assessments for non-major capital works and existing infrastructure. For example, NAGA and the Eastern Alliance for Greenhouse Action (EAGA) have been developing and trialling a regional building vulnerability assessment tool with ARUP that could be supported and extended to non-council buildings ([www.naga.org.au](http://www.naga.org.au)) . Local governments have also identified a priority need to incorporate climate change risks into asset management planning more broadly to include roads, street trees, footpaths, drains etc. |

## The discussion paper includes the option (option 52, page 76) to strengthen high-priority habitat corridors throughout Melbourne and its peri-urban areas to improve long-term health of key flora and fauna habitat. *Do you agree with this idea? Choose one option:*

Strongly Agree

***Why?***

|  |
| --- |
| • NAGA supports strengthening high priority habitat corridors as a key component of climate change resilience. As well as biodiversity protection, these corridors should allow for movement of species as local climate conditions change, and support incorporation of climate change projections in revegetation and greening projects.  • NAGA notes that EAGA has developed a monitoring framework for biodiversity and climate change that could be adopted at the wider metropolitan Melbourne scale to promote consistency and integrity. |

## **The discussion paper includes options (options 53 and 54, pages 78 and 79) to introduce strategies to cool our city including: increasing tree canopy, vegetated ground cover and permeable surfaces; use of Water Sensitive Urban Design and irrigation; and encouraging the uptake of green** roofs, facades and walls, as appropriate materials used for pavements and buildings with low heat-absorption properties. *What other strategies could be beneficial for cooling our built environment?*

|  |
| --- |
| • NAGA welcomes the strong focus on urban heat in the discussion paper, and the integration of the latest research on the importance of green infrastructure as a key cooling strategy.  • NAGA emphasises that urban heat is also a planning equity issue, where urban heat is concentrated in areas of lower income housing. Where the wealthy leafy eastern suburbs are cooler, the northern and western suburbs of the NAGA and WAGA region are particularly vulnerable to heatwaves. This points to an important policy direction to plant more trees and green infrastructure in hotter and poorer suburbs to achieve health and climate change adaptation outcomes.  • Recent heat vulnerability mapping undertaken by City of Moreland for their Urban Heat Island Action Plan has identified many priority areas for increasing urban greening to alleviate heat. Many of these areas are outside the scope of individual councils to be able to significantly change. For example, a significant heat island occurs across the northern metropolitan ring road and parallel cycling path. As hot northerly winds pass through this barrier to the northern suburbs, it exacerbates the heat entering the city. This should be identified as a key area for cooling.  • Across the regional climate change plans developed by each of the metropolitan greenhouse alliances, urban heat is a consistent priority climate change risk, and green infrastructure is a key objective in addressing this. Whilst many local governments are currently developing their own urban forest strategies, or street tree management plans to address this issue locally there is a need for greater coordination across the region. It is important to identify the different roles and responsibilities of addressing urban heat and promoting green infrastructure across different levels of government. Alliances such as the 202020 network are important in establishing a common vision, increasing capacity building and helping councils work through the issues in developing local strategies.  Planting more vegetation to cool our city/Greening buildings and surfaces  • NAGA supports that Plan Melbourne 2016 should adopt strategies to encourage increased canopy cover, vegetated ground cover and permeable surfaces throughout Melbourne. In both of the recent climate change adaptation plans developed by the Eastern Alliance for Greenhouse Action (EAGA) and NAGA, regional greening strategies have been identified as a key action, and working with state government to achieve higher rates of greening is vital.  • NAGA recommends replacing water sensitive urban design with Integrated Water Cycle Management as a broader approach to water efficiency than Water Sensitive Urban Design (WSUD), recycled stormwater and treated wastewater. |

## Thediscussion paper includes the option (option 56A, page 80) to investigate opportunities in the land use planning system, such as strong supporting planning policy, to facilitate the increased uptake of renewable and low-emission energy in Melbourne and its peri-urban areas. *Do you agree that stronger land use planning policies are needed to facilitate the uptake of renewable and low-emission energy? Choose one option:*

Agree

***Why?***

|  |
| --- |
| • NAGA supports the advice from the MAC on strengthening local renewable energy in precinct scale planning  • |

## The discussion paper includes options (options 56B and 56C, page 80) to strengthen the structure planning process to facilitate future renewable and low-emission energy generation technologies in greenfield and urban renewal precincts and require consideration of the costs and benefits of renewable or low-emission energy options across a precinct. *Do you agree that the structure planning process should facilitate the uptake of renewable and low-emission technologies in greenfield and urban renewal precincts? Choose one option:*

Strongly Agree

***Why?***

|  |
| --- |
| * NAGA recommends that the structure planning process guidelines be updated to put more focus on the implementation and governance, financial and stakeholder barriers which need to be overcome * NAGA also notes that structure planning processes have a broader opportunity to include other relevant intersections of climate change mitigation and adaptation such as ensuring SPP guidelines include analysis of urban heat island effect. |

## The discussion paper includes the option (option 57, page 81) to take an integrated approach to planning and building to strengthen Environmentally Sustainable Design, including consideration of costs and benefits. *Do you agree that an integrated planning and building approach would strengthen Environmentally Sustainable Design?* *Choose one option:*

Strongly Agree

***Why?***

|  |
| --- |
| * NAGA has long advocated for stronger environmentally sustainable design controls in the planning and building process than currently exists. Many NAGA councils have progressed this through the introduction of ESD and Water Sensitive Urban Design local planning policies. We recommend that the state government adopt a statewide ESD policy and encourage better integration between the planning and building systems. * A number of Victorian Councils and the Council Alliance for Sustainable Built Environment (CASBE) have developed a new sustainability assessment tool, BESS, which is purpose built for the planning process. If the State Government wishes to introduce Statewide ESD controls then it would be appropriate for them to support and assist in resourcing the ongoing use of BESS in some way. |

## *Any other comments about chapter 6* (a more resilient and environmentally sustainable Melbourne)?

|  |
| --- |
| * We commend and strongly support the MAC recommendation that climate change is positioned front and centre of Plan Melbourne 2016, to highlight its significant pressure on Melbourne’s development. The metropolitan greenhouse alliances have undertaken regional climate change risk and vulnerability assessments that have identified the wide ranging impacts of climate change across all sectors. Also, we highlight the importance of incorporating the Resilient Cities project currently being led by the City of Melbourne. * Plan Melbourne 2016 plays an important role in connecting many of the strategies across different government departments and agencies and this needs to be recognised in the text. * NAGA supports the role of the polycentric city and the 20 minute neighbourhood as key building blocks for addressing climate change and sustainability issues. |
|  |