



25 November 2020

Stuart Mosley
Chief Executive Officer
Victorian Planning Authority

By email: stuart.mosley@vpa.vic.gov.au

Dear Stuart

Submission: Draft Precinct Structure Plan (PSP) Guidelines

The Urban Development Industry of Australia, Victoria Division (UDIA Victoria) is a non-profit advocacy, research and educational organisation supported by a membership of land use and property development organisations, across the private sector and Victoria’s public service. We are committed to working with both industry and Government to deliver housing, infrastructure, and liveable communities for all Victorians.

UDIA Victoria congratulates the Victorian Planning Authority (VPA) on the preparation of the draft Precinct Structure Plan Guidelines (the draft Guidelines). The draft Guidelines represent a large body of work and stakeholder engagement. They provide a vision and framework for the growth and development of Melbourne’s outer urban areas that will spark major investment and provide opportunity for affordable housing and liveable new communities for many thousands of people.

The current Precinct Structure Plan (PSP) Guidelines are more than 10 years old. Strengthening and updating the framework is a welcome measure and will provide a sound basis for the VPA’s ongoing PSP program.

UDIA Victoria has developed a significant and detailed submission in consultation with our Board and Greenfield Developers Committee, Planning Committee and Innovation, Sustainability and Technology Committee. Some of the issues we have raised may be appropriately addressed by the final Guidelines, or through the development of future practitioner tools. Our submission lays the foundation for a comprehensive consultation and cocreation process with the VPA to develop final Guidelines and tools.

Our submission is structured to include:

- **Priority Issues**

These issues are called out as major areas of concern that we feel are worthy of several working sessions with VPA staff to resolve suitable solutions.

- **Other Issues**

These provide a more comprehensive assessment of the draft Guidelines, and a platform for the VPA to work with the urban development industry to further refine the draft Guidelines with a view to making them more workable, and more able to deliver world-class urban development innovations and outcomes.

- **Technical Response**

We have also provided a Technical Response to the detail of the draft Guidelines which we trust will provide practical feedback and potential solutions to issues raised through the consultation process.

The Priority Issues we have raised include:

Priority Issue 1: Density Requirements

The draft Guidelines seek to drastically increase development densities, by close to double the current density levels. UDIA Victoria does not support this increase in density requirements and is firmly of the view that the market and homebuyers will be disadvantaged if this approach is implemented.

Simply seeking to regulate higher densities with around 75% of new development at more than 30 dwellings per hectare is unworkable (refer to our density analysis in Attachment 1).

Development densities have been increasing gradually over the past decade and are now on average around 17 to 18 dwellings per hectare. Developers are able to achieve 17-20 dwellings per hectare. To mandate that a high proportion of new development be at least 30 dwellings per hectare, is too steep an increase and, in our view, will be unworkable.

Priority Issue 2: Innovation Pathway

The innovation pathway is a good concept and we strongly support it. However, we are concerned that it will be a more complex, expensive and uncertain assessment and approval pathway which may deter proponents pursuing innovation.

We are also concerned that the pathway may take much longer than a standard PSP and therefore be a drag on timelines. We make recommendations to ensure that it can work well and is faster than a standard PSP to act as an incentive for development proponents.

Priority Issue 3: Urban Tree Canopy

The new Guidelines seek to significantly boost urban tree canopy. Unfortunately, the current engineering and design construction standards do not allow this outcome to be achieved.

UDIA Victoria urges the VPA to prioritise the allocation of resources to work with utility authorities and local government to overcome the conflict between policy aspiration and practical implementation that will prevent the achievement of this important objective.

Priority Issue 4: Place Based Design and Master Planning Flexibility

The PSP Guidelines should give greater prominence for the main driver of PSP design to be an integrated, placed based urban and landscape design response. In particular, site responsive design as opposed to formulaic design is essential. In this context we are concerned that the draft Guidelines seek to introduce even more specific metrics that will drive PSP design to a formula. The PSP plans and text also need to be drafted so that there is greater flexibility for placed based master planning that varies from the PSP future urban structure plan to be approved at the subdivision permit stage.

Priority Issue 5: We need a Short Form Integrated PSP

PSPs have become too long and usually include generic design requirements and guidelines that are for the most part repeated from PSP to PSP. There is an opportunity to lift and shift these into the planning scheme so that the PSPs can be far more site specific and focused in their drafting.

Priority Issue 6: Scale of Employment Areas

The Growth Area Corridor Plans have designated vast areas for long term employment use.



The UDIA Victoria submits that increased commercial and market-based assessments should be undertaken to review these designations.

UDIA Victoria recognises and supports the important and long-term role of the VPA in setting the policy framework for the growth and development of Melbourne's outer suburbs. We look forward to continuing to partner with the VPA to deliver world-class urban development outcomes for our fastest growing communities.

We would welcome the opportunity to present to the VPA on the issues raised in this submission. Please contact me at danni@udiavic.com.au to arrange a time for us to meet.

Kind regards,

A handwritten signature in black ink that reads 'Danni Hunter'. The signature is written in a cursive style with a long, sweeping underline that loops back under the name.

Danni Hunter
Chief Executive Officer
Urban Development Institute of Victoria

E: danni@udiavic.com.au

M: 0400 230 787

Draft Precinct Structure Plan Guidelines – Victorian Planning Authority

List of Recommendations

Priority Issues

- Recommendation 1: Revise density requirements within the PSP guidelines and be consistent with Plan Melbourne and so that increased density requirements are introduced over a longer period time at a slower rate starting at 17-20 per hectare.
- Recommendation 2: Work with industry to reform planning and engineering barriers to achieving higher residential densities and devise new tools to allow industry to increase densities over time.
- Recommendation 3: Streamlined and fast-tracked assessment and approval processes need to be established to incentivise industry to participate in the Innovation Pathway. These could include additional resources, a faster planning pathway, scoping the innovation up front before significant resources are applied by a proponent and ensuring a senior management-led governance framework to gain buy-in and so key decisions are made at the right time.
- Recommendation 4: Urgently resolve the conflict between policy objectives and engineering standards and authority approvals as they relate to achieving greater tree canopy.
- Recommendation 5: Ensure that PSP design makes it clear that responsible authorities have flexibility to vary from the PSP design where the variation will produce a net community benefit and where it is driven from site responsive master planning.
- Recommendation 6: Create a short form PSP by moving standard UGZ and PSP provisions into the planning scheme which will allow the PSP to be shorter and more focused.
- Recommendation 7: Undertake a rigorous evidence-based assessment of Melbourne’s employment land requirements to inform the basis of the final Guidelines, in conjunction with the implementation of the Melbourne Industrial and Commercial Land Use Plan (MICLUP).
- Recommendation 8: Reconsider the extent of employment land allocation, where the land supply is decades beyond what is necessary.

Other Issues

- Recommendation 9: The Victorian Government should identify priority or catalytic projects in PSPs that can be considered for GAIC WIK agreements by the development industry and state and local government.
- Recommendation 10: Prepare a draft practice note to support GAIC WIKs and the PSP process to leverage greater private and public sector investment in key infrastructure assets.
- Recommendation 11: Amend the PSP Guidelines to reform the approach to activity centre planning to create a more strategic, flexible framework.
- Recommendation 12: Refine the VPA’s role to approving an overall plan for an activity centre, rather than the detail of specific permit applications.

- Recommendation 13: Split the final Guidelines out into several documents as per the existing Guidelines to reduce their volume, complexity improve their quality and usability.
- Recommendation 14: Rapidly develop and complete proposed Practitioners' Guidelines, having regard to submission on detailed issues.
- Recommendation 15: Create a single consistent policy approach between residential development standards throughout Victoria and avoid creating two separate policy frameworks.
- Recommendation 16: Strengthen the VPAs role to effectively co-ordinate provision of infrastructure and services to align to PSP needs as rollout occurs.
- Recommendation 17: Amend the drafting of T6 to ensure that the relative costs and benefits of potential bridge crossings are considered, and that net community benefit drives the final decisions.
- Recommendation 18: Further policy work should be undertaken to determine how affordable housing provisions are dealt with in future PSPs.
- Recommendation 19: Undertake modelling of approved PSPs to determine whether the new community infrastructure standards proposed are achievable.
- Recommendation 20: Engage proactively with UDIA Victoria and bring together the objectives of the new agency, Homes Victoria and the Victorian Government's Big Housing Build agenda, with the development industry as a delivery partner.
- Recommendation 21: Refine the PSP Guidelines and the UGZ provisions and applied zones to better integrate PSPs with the MSA.
- Recommendation 22: Undertake more policy development to give greater guidance for the planning of employment areas.
- Recommendation 23: Undertake modelling of approved PSPs to determine whether the new standards proposed for schools are achievable in future PSPs.
- Recommendation 24: Refine the heritage provisions to reflect existing regulatory requirements and to improve guidance around rock walls which are common in Melbourne's west and north.
- Recommendation 25: Refine the PSP Guidelines around open space planning to deliver a more integrated approach to optimise use of encumbered land.
- Recommendation 26: Refine the PSP Guidelines and template to introduce a new provision to identify road widening, drainage and other acquisitions to better integrate and activate s36 of the Subdivision Act.

Draft Precinct Structure Plan Guidelines – Victorian Planning Authority

Detailed Submission

PRIORITY ISSUES

1. Density Requirements

The initial incarnations of Melbourne 2030 and Plan Melbourne sought to increase housing densities to 15 and now to 20 dwellings per hectare.

Plan Melbourne strengthened policy around increasing growth area housing densities and is seeking to lock in outcomes of at least 20 dwellings per net developable hectare. Plan Melbourne provides the following:

“In the future, planning and development of growth areas should:

- *provide around 15 years supply of land approved for development*
- *over time, seek an overall increase in residential densities to more than 20 dwellings per hectare*
- *be sequenced to ensure new precincts are contiguous with previously approved precincts.*

This approach will link infrastructure delivery to land release, ensuring residents in new communities receive the services and infrastructure they need sooner. Coordinated planning such as this will help create stronger, healthier communities.”

Plan Melbourne seeks to increase average densities to more than 20 dwellings per hectare. The VPA has not provided any rationale for the intention to increase densities in the draft Guidelines by a further 50% to 30 dwellings per hectare across most land. The draft Guidelines are seeking to go beyond the policies of Plan Melbourne with a demand for densities to increase to 30 dwellings per hectare across the vast majority of land developed.

The final Guidelines should be adjusted to be consistent with Plan Melbourne and look to implement densities of 17-20 per hectare. The proposed densities, if implemented at 30 per hectare, would effectively mark the end of compact suburban development and the mark of a new townhouse dominated development model in Melbourne’s growth areas.

UDIA Victoria wishes to have a meaningful discussion with the VPA around housing density policy. We propose to hold collaborative discussions with the VPA to address the barriers to achieving higher development densities, and work together to remove those barriers in the next wave of reform.

Some of the issues our members have raised in relation to the proposed densities include:

- Any regulated changes in density need to be signalled and phased in to ensure competitive neutrality is maintained. This would ensure that developers in adjacent PSPs are not forced to have starkly different development models and densities.

It is quite likely for example, that one or more older PSPs might have a density requirement of 15 or 16 per hectare whereas some new adjacent PSPs under the new regime might have a majority of housing required to be twice that density at 30 dwellings per hectare.

- Current development design and engineering standards do not allow for the mass production

of 30 dwelling per hectare estates. Some examples of the difficulty in achieving the proposed dwelling density include:

- Streets are mandated at 16m meaning that if higher densities were introduced, streets would make up around 40% of the developable land. Further, a typical front setback of 4m generally applies. These requirements mean that more than 50% of land would either street reserve or front setback.
- Single dwelling standards call for 60% permeable area on a lot, reinforcing the front setback arrangement and limiting building volume.
- To maximise density there would be an increase in narrow lots creates a higher proportion of the streetscape to be driveways, creating increase urban heat and less space for trees to grow.

There would need to be a new way to design streets and developments, with a new set of standards introduced, to allow the industry to achieve greater densities. If we are to create a more sophisticated approach to design to enable a higher level of density to be achieved, then the way we currently regulate design needs to change.

For example:

- Designing space with a multi-function and multipurpose to get more out of the PSP landholding.
 - Community facility design could be multi-level land footprints and also apply to schools.
 - Schools could be halved in size of buildings were 2-4 stories, just needing ground space for play, ball courts and oval spaces.

We need to explore efficiencies throughout the urban form to create a more balanced approach to density. Government needs to work hard to leverage its own assets and to find opportunities to increase density beyond the scope of residential development.

The density requirement for 30 dwellings per hectare appears to apply to land within 800m of rail stations, PPTN routes and town centres. There needs to be a differentiation in density between locations where rail and PPTN bus has already been delivered compared to transport infrastructure that is part of a long-term transport plan.

UDIA Victoria submits that simply seeking to regulate higher densities with around 75% of new development at 30 dwellings per hectare is unworkable. Development densities have been increasing gradually over the past decade and are now on average around 17 to 18 dwellings per hectare. Developers are able to achieve 17 to 20 dwellings per hectare but to force a majority of new development to be at least 30 dwellings per hectare is a bridge too far.

Attached is a high level analysis of the Western Growth Corridor density. UDIA Victoria applied the draft Guidelines to approved PSPs in Melbourne's Western Growth Area. Specifically we applied a 30 dwelling per hectare density within 800m of every town centre, train station and PPTN Bus Network. The result shown in Attachment 1 is that an incredibly high 77.6% coverage of developable land in the Western Growth Corridor would be subject to a the new high density housing requirement.

More collaboration is required between Government and industry to develop strategies that allow for urban densities to continue to increase with a collective goal to drive densities higher gradually over a period of time. As stated, many of the current planning and engineering requirements make it very difficult to efficiently achieve 30 dwellings per hectare. These requirements should be

remodelled so that industry can respond and continue to gradually increase densities.

Recommendation 1

Revise density requirements within the PSP guidelines and be consistent with Plan Melbourne and so that increased density requirements are introduced over a longer period time at a slower rate starting at 17-20 per hectare.

Recommendation 2

Work with industry to reform planning and engineering barriers to achieving higher residential densities and devise new tools to allow industry to increase densities over time.

2. Innovation Pathway

UDIA Victoria supports the concept of an innovation pathway but there are several key areas that need further development for the mechanism to be effective in achieving its objectives. These include:

- Risk of time delay.

Major development proponents would be reluctant to commit to an innovation pathway if it took longer than the conventional pathway. There are a range of potential solutions to this – such as additional dedicated staff and resources, additional project management, funding and resource allocation from the development proponent, or guarantee of s96A permit and full secondary concepts, including constructions plans for the first 300 to 500 lots so the developer can gain time back at that point.

- Risk of resource waste if the innovation concepts are rejected late in the process.

There would need to be an agreed overall position on the conceptual outcomes and a formal commitment to that form the CEO level of key stakeholders. This is a threshold issue. This will give all the confidence to invest time and resources in delivery of the innovation. A sound governance framework to maintain CEO level decision making is also important.

- Underestimating the extent of work required.

The Guidelines need to have regard to the level of resources and work required to prepare and provide engineering, landscape, building and maintenance proposals, and the complexity of responsibility arrangements required.

- Examples of potential innovations.

Limited examples of potential innovations are included in break out boxes in the draft Guidelines. Further development of the different innovation models should be provided in the final Guidelines, and these can then be published in a practitioners guide.

UDIA Victoria submits that there is scope for a bespoke process to be created for the innovation pathway. In principle the pathway should:

- Be faster than the 2.0 pathway with guaranteed timeframes should this path be pursued.
- Provide for vastly greater design flexibility than a traditional PSP.
- Deliver the full range of development approvals to allow construction at the time the PSP or permit is issued.
- Run ahead of the slower full PSP process that sits around it.

- Allow for design detail to be achieved at the satisfaction of the responsible authority rather than generally in accordance with the relevant PSP.

Some simple mechanisms that could be explored are to:

- Develop an innovation pathway threshold agreement with stakeholders.
- Finalise a high-level structure plan that drops the Corridor Plan down into more detail, but not the detail of a PSP. This could be in the form of a very concise 'Innovation PSP' that includes the key framework.
- Carve out a site, for example a 60-hectare site, and allow the final form of development to be to the satisfaction of the responsible authority and the VPA. This is similar to the UDF and Activity Centre model at present.
- Allow innovation sites to run ahead of the wider PSP.
- Provide standard s173 and other agreements to open the approvals pathways.

Recommendation 3

Streamlined and fast-tracked assessment and approval processes need to be established to incentivise industry to participate in the Innovation Pathway. These could include additional resources, a faster planning pathway, scoping the innovation up front before significant resources are applied by a proponent and ensuring a senior management-led governance framework to gain buy-in and so key decisions are made at the right time.

3. Priority Issue 3: Urban Tree Canopy

The draft Guidelines seek to significantly boost urban tree canopy which is a necessary and welcome objective. UDIA Victoria has long advocated for a better approach to increasing tree canopy for the health, climate and liveability benefits.

However, the current engineering and design standards, and the requirements of utility and local government authorities, simply do not allow this outcome to be achieved and this must be addressed and solved.

UDIA Victoria urges the VPA make this a high priority and to work with the urban development industry, utility authorities and councils to break this deadlock between policy objectives and engineering and design standards.

Recommendation 4

Urgently resolve the conflict between policy objectives and engineering standards and authority approvals as they relate to achieving greater tree canopy.

4. Priority Issue 4: Place Based Design and Master Planning Flexibility

The PSP Guidelines should give greater prominence for the main driver of PSP design to be an integrated, place based urban and landscape design response. In particular, site responsive design as opposed to formulaic design is essential.

In this context we are concerned that the draft Guidelines seek to introduce even more specific metrics that will drive PSP design to a formula. The PSP plans and text also need to be drafted so that there is greater flexibility for place-based master planning that varies from the PSP future urban structure plan to be approved at the subdivision permit stage.

Recommendation 5

Ensure that PSP design makes it clear that responsible authorities have flexibility to vary from the PSP design where the variation will produce a net community benefit and where it is driven from site responsive master planning.

5. Priority Issue 5: Short Form Integrated PSP

UDIA Victoria submits that there is an opportunity to better integrate PSPs with the planning system more generally. Many typical PSP requirements and guidelines are generic and are routinely applied in most or all PSPs. These could be lifted and shifted into the planning scheme to reduce the volume of information and detail required in a PSP. There are also a series of Urban Growth Zone (UGZ) and PSP provisions that are consistent, but which do not necessarily appear in or are relevant to every PSP, which could also be included in the planning scheme.

Some of the PSP provisions, for example the detailed tables of Local Town Centre Design Guidelines, could form an Incorporated Document in the planning scheme, or they could be shifted into the scheme proper.

To date there has not been a concerted effort to fully integrate PSP drafting with the wider planning scheme and ResCode. With the increasing depth of PSP delivery experience there is an opportunity to adjust provisions between ResCode and PSPs. This work could form part of the proposed Practitioner Guidelines for the Template Compact PSP. UDIA Victoria submits that there is scope to integrate requirements and guidelines in PSPs, with those in ResCode.

The original intent of the UGZ concept was that there would be very few requirements in PSPs, and that these would be more site specific, place-based planning frameworks. Over time, that model evolved so that each and every PSP includes around 100 requirements and guidelines. All requirements must be met so that either lodged plans must show how the requirement is met or else the permit must be conditioned to achieve that outcome. In reading through these typical PSP requirements, they are for the most part generic and appear in each and every PSP.

If the generic requirements can be removed and placed in the scheme and ResCode updated and addressed then the PSP itself could become far more streamlined, and the intent of place based, more site-specific requirements and guidelines could be achieved. It would also be possible to reduce the bulk in many UGZ schedules and in doing all of this there would be less need to debate specific wording of common clauses at panel hearings or elsewhere.

Recommendation 6

Create a short form PSP by moving standard UGZ and PSP provisions into the planning scheme which will allow the PSP to be shorter and more focused.

6. Priority Issue 6: Scale of Employment Areas

The Growth Area Corridor Plans designate vast areas for long-term employment use. UDIA Victoria submits that increased commercial and market-based assessments should be undertaken to review these designations. In some cases, like the Northern Growth Corridor for example, we consider that there is between 50 and 100 years of employment land designated. It would be more appropriate to have a more suitable, lesser, supply of employment land so that residential communities can be better integrated and to reduce the need to expand the urban footprint as the need for residential land continues to grow.

Recommendation 7

Undertake a rigorous evidence-based assessment of Melbourne's employment land requirements

to inform the basis of the final Guidelines, in conjunction with the implementation of the Melbourne Industrial and Commercial Land Use Plan (MICLUP).

Recommendation 8

Reconsider the extent of employment land allocation, where the land supply is decades beyond what is necessary.

Other Issues

7. Growth Areas Infrastructure Contribution (GAIC) Works in Kind (WIK) Agreements

When the GAIC was originally announced the industry had hoped that developers could use GAIC WIK Agreements to build catalytic projects that could help open new growth fronts and boost services in major master planned communities. Government subsequently narrowed the WIK policies to limit the type of projects that could be pursued.

The framework for delivering GAIC WIK Agreements has only been developed in recent years and there is significant room for improvement and more streamlined approaches to delivering land and construction GAIC WIKs.

A clearer program of future investment of GAIC is required to provide clearer signals to local government, communities and the development industry about what kinds of projects will be included in the GAIC project pipeline.

Recommendation 9

The Victorian Government should identify priority or catalytic projects in PSPs that can be considered for GAIC WIK agreements by the development industry and state and local government.

Recommendation 10

Prepare a draft practice note to support GAIC WIKs and the PSP process to leverage greater private and public sector investment in key infrastructure assets.

8. Activity Centre Planning

The VPA have evolved their approach to activity centre planning, and UDIA Victoria considers that there is scope for further improvements now that there is more experience with rolling out centres under the original PSP Guidelines. The VPA is the determining referral authority both in terms of Urban Design Framework (UDF) approval for major town centres (as the UDF needs to be to the joint satisfaction of the responsible authority and the VPA), and in respect of permit applications valued at more than \$500,000 in any activity centre.

UDIA Victoria submits that it is time to review the policy framework and make adjustments as the system is maturing. These adjustments should be reflected in the final Guidelines. The draft Guidelines could be expanded to solidify the approach to activity centre planning. There is a need for more guidance around planning for major town centres as well as smaller centres than what is currently reflected.

UDIA Victoria also submits that there is a need to focus on structural outcomes at the PSP stage and avoid the depths of detail contained in PSPs covering issues that are better resolved at permit stage.

In Victoria, we are experiencing major structural changes to the retail industry including the

demise of discount department store models, transformation of supermarkets with click and collect, an uptick in online processes as a result of COVID. These trends are creating permanent behavioural changes and structural changes to retail and industry such as the introduction of robotics into the logistical supply chain, will have major implications for how these centres need to operate in the future.

There needs to be flexibility in the planning of town centres to account for these trends in a way that was not as necessary in recent decades. The PSP Guidelines need to provide more depth of policy around how the centres are to be planned in response to these macro policy issues.

Recommendation 11

Amend the PSP Guidelines to reform the approach to activity centre planning to create a more strategic, flexible framework.

Recommendation 12

Refine the VPA's role to approving an overall plan for an activity centre, rather than the detail of specific permit applications.

9. PSP Guideline Structure

The 2009 PSP Guidelines have the following broad structure:

- Part One – Overview of Growth Area Planning.
- Part Two – Preparing the Precinct Structure Plan.
- Part 3 – Contents of a Precinct Structure Plan.
- A series of PSP Notes on specific topics:
 - Engaging the public and private sectors.
 - Biodiversity management.
 - Cultural heritage management.
 - Our roads: Connecting people.
 - Integrated water management.
 - Non-Government schools.

In comparison the draft Guidelines have the following structure:

- Part 1 – Purpose and Planning Context. This includes contextual information similar to the existing Part 1 of the Guidelines.
- Part 2 – PSP Pathways and Processes (2.0). This is similar to the existing Part 2 of the Guidelines.
- Part 3 – Constructing a PSP. This is the bulk of the detailed standards and is similar to Part 3 of the Existing Guidelines.
- Part 4 – Practitioners Toolbox. This is similar in structure to the existing PSP Notes.

UDIA Victoria supports the overall structure of the draft Guidelines. However, many of our members have made specific comment that it would be more practical if the final Guidelines were split out into several documents as per the existing Guidelines. This would improve usability and legibility for different practitioner purposes.

The practitioner's tools proposed in the draft Guidelines include:

- Commonly required technical reports and example briefs – formalising the draft briefs will be a helpful addition to the PSP Guideline framework. It will be important to include commentary for each brief around how it should be tailored to particular sites and circumstances – with examples of variations.

Otherwise, there is a risk that less experienced practitioners may adopt standard briefs when a sharper focus would be preferred. The practitioner note should also seek to obtain all previous relevant reports, including from development proponents and avoid duplication of effort. On occasion a peer review is all that is required rather than repeated work.

- Template compact PSP and general guidelines (being prepared for the compact PSP template) – this is a crucial and high priority project as it forms the essence of what is produced by the VPA daily.
- Applying these Guidelines in Regional Victoria – we would expect that eventually the Guidelines would apply in Regional Victoria. However, there are elements in the Guidelines that would not be relevant or appropriate in the Regions.

UDIA Victoria requests a working session with the VPA to discuss this approach. We would seek to involve our Geelong and Bendigo Chapters in this important process.

UDIA Victoria submits that this work should happen before the final Guidelines are finalised. A key issue would be residential densities which would need a different approach for Regional Victoria.

- Community infrastructure guidelines – the former Growth Areas Authority (GAA) prepared extensive materials around planning guidelines for social infrastructure in Melbourne's Growth Areas in a joint project with the growth area councils. We see value in updating this work and expressing it in a practitioner's note.
- Provision of non-Government schools – the GAA previously prepared a PSP Note dealing with this issue. We agree that there is value in updating that work. UDIA Victoria would welcome specific discussion around how land is managed when there is no demand for non-Government schools in greenfield PSPs. This issue was addressed in multiple planning panels and a clear direction from the Guidelines around this would create more certainty for the different stakeholders.
- Engagement practice note – an update of the existing stakeholder engagement process, specifically to align to the PSP 2.0 process would be a welcome proposal.
- Urban Growth Zone (UGZ) and Applied Zones – when the UGZ was conceived, it was designed to allow for flexibility around the edges of zones and specific wording was developed to allow for permits to remove the deliberate doubt. Over time the VPA has moved towards a more traditional approach which has advantages, but it does remove the desirable flexibility of the original approach. Further engagement around these issues would be welcome.
- Affordable housing in Greenfield precincts – there is a strong need for a collaborative approach to occur with industry to work through the various issues around how PSPs can best address this issue.
- Movement and place framework – the VPA and Department of Transport (DoT) have

advanced planning policy around road design, standardised costs for intersection and road treatments and this work is continuing to be developed.

We understand that the DoT are set to release new policy around streets. Upon that release UDIA Victoria submits that policy and design workshops should be held to review the policy work and create a collaborative process to complete these frameworks and update the PSP policy work.

- ICP Guidelines – we understand that the intention here is to simply provide a cross reference to the relevant ICP Guideline material on the VPA Website. UDIA Victoria has made separate submissions to the VPA and Minister around ICPs.
- Generally in Accordance With – UDIA Victoria submits that there is a fundamental problem in the way PSPs drawings and text is designed and the relevant templates that overly restricts development design response and master planning to the detriment of future communities and causing in part a sameness of development outcomes. There is a need for strong engagement with our members around the new PSP template and in particular how more space for appropriate flexibility can be created and then the current practitioners guide updated.
- Integrated water management – UDIA Victoria supports early engagement with our members around this issue. There are a range of authority responsibility, resourcing and maintenance questions to be addressed upfront before integrated water management can be taken a step forward and better outcomes achieved.
- Alternative energy in the Greenfields – this is a fast-emerging area of technology and market development. A flexible and high-level approach, a watching brief should be adopted for the next few years before resources are applied in this area.
- Co-ordinated delivery of infrastructure and staging provisions – UDIA Victoria would welcome early discussions around the scope of this work. Any process that can better link up Government and take a more placed based approach to prioritise infrastructure and act to catalyse better outcomes for growth area residents would be welcome.

Recommendation 13

Split the final Guidelines out into several documents as per the existing Guidelines to reduce their volume, complexity improve their quality and usability.

Recommendation 14

Rapidly develop and complete proposed Practitioners’ Guidelines, having regard to submission on detailed issues.

10. Regional Victoria Framework

There is a need to consolidate a range of policy and planning frameworks that are occurring between metropolitan and regional Victoria. Different standards to suit context can be maintained, however the underlying policy frameworks should be consistent.

For example, there are two sets of engineering design standards for Regional Greenfield settings and Metropolitan Greenfield settings. There is no reason for two sets of standards. Where there are unique regional reasons for differentiation, (such as desired land use, soil treatments required or necessary infrastructure) they can be addressed in the formatting and drafting of the standards.

Another example is the current work from the regional council’s around Sustainable Subdivisions

which has merit but may create additional policy discrepancies.

Recommendation 15

Create a single consistent policy approach between residential development standards throughout Victoria and avoid creating two separate policy frameworks.

11. Infrastructure and Services to Support Higher Density Activation

UDIA Victoria submits that the VPA should be provided a stronger role within Government to co-ordinate and infrastructure and service delivery to support land supply and development.

UDIA Victoria does not support regulated densities adjacent to a 'potential' PPTN bus route or a 'potential' rail station where there is no commitment to delivery from Government. A different, more nuanced approach is required in PSP drafting.

Recommendation 16

Strengthen the VPAs role to effectively co-ordinate provision of infrastructure and services to align to PSP needs as rollout occurs.

12. Major Rail and Creek Crossings

The draft Guidelines introduce unrealistic expectations around spacing of crossings of rail, creek and other barriers within and between communities (refer T6 for example).

The final Guidelines to be clear that a cost benefit analysis is required and that net community benefits needs to be considered. There is also a difference between planning for such crossings and expecting the crossings to be funded from development if the temporal nexus is weak. There are different costs to cross different physical conditions and a one size fits all approach does not work.

Recommendation 17

Amend the drafting of T6 to ensure that the relative costs and benefits of potential bridge crossings are considered, and that net community benefit drives the final decisions.

13. Affordable Housing

Changes to the Act have strengthened the status of affordable housing and created a new conversation around provision of affordable housing through the PSP process. This work is embryonic, and government expectations are not clear. The negotiated framework risks creating a new layer of negotiation and delay in the planning and development approval process.

UDIA Victoria has previously made submissions addressing this to the Victorian Government and it remains an area requiring further work. UDIA Victoria submits that a PSP practise note around affordable housing and the PSP process should be developed in collaboration with our industry.

UDIA Victoria does not support specific requirements for new development to provide affordable housing supply by way of inclusionary zoning. UDIA Victoria has proposed a balanced approach that we believe has the best chance of delivering affordable housing outcomes at scale without compromising supply or the median house price.

UDIA Victoria proposes:

- A low, flat rate, broad-based Affordable Housing Contribution, like the Fire Services Levy, transitioned over a period not less than 5 years, to replace all other affordable housing provisions.

- Affordable housing delivery targets supported by an Affordable Housing Delivery Toolkit of funding and incentive measures that can be applied to fund the gap between the cost of delivering and the Affordable Housing Contribution.
- A whole-of-government Affordable Housing Strategy is required, rather than seeking to introduce affordable housing requirements at the Council level.

There is no ability under the Act to tax development for government to deliver affordable housing as some form of cash in lieu scheme. There is no power to force developers to make the form of contributions often discussed. Developers may elect to enter into a voluntary agreement with Council to deliver on such proposals.

Recommendation 18

Further policy work should be undertaken to determine how affordable housing provisions are dealt with in future PSPs.

14. Supporting Community and Recreation Infrastructure

There are a range of new standards for providing education and community infrastructure in PSPs. We would like to see comprehensive spatial modelling from the VPA to show the impact on PSP future urban structures and what the implications for the new standards will be.

The new standard to show locations for government-provided social housing in PSPs seems unachievable. The Director of Housing does not proactively engage with developers of new land estates or at the PSP stage. Designation of land for social housing will trigger compensation for developers if land is reserved via the PSP for a public purpose. These sorts of issues need to be worked through. It would be more realistic for the Director of Housing to start working more closely with developers before any view to regulate in this manner is contemplated.

Recommendation 19

Undertake modelling of approved PSPs to determine whether the new community infrastructure standards proposed are achievable.

Recommendation 20

Engage proactively with UDIA Victoria and bring together the objectives of the new agency, Homes Victoria and the Victorian Government's Big Housing Build agenda, with the development industry as a delivery partner.

15. Integration with the Biodiversity Conservation Strategy (BCS) and Melbourne Strategic Assessment (MSA)

The inflexibility of the existing BCS and MSA arrangements provide an opportunity for a more nuanced approach to be designed into the statutory framework that is able to deal with land use changes in a way that could overcome administrative barriers. This could be addressed as part of the proposed Practitioners tool around zoning controls.

Standard F12.2 around native vegetation seeks to institute the principles of 'avoid, minimise and offset' when dealing with native vegetation. This is a policy of the planning scheme already and does not need to be repeated in the PSP Guidelines.

Further, the BCS has already provided the 'avoid and minimise' principles and the MSA levy provides for the offsetting. This part of the draft Guidelines needs to be revised. Provided the BCS is complied with, there is no need for further application of the 'avoid and minimise' policy – that is fundamentally how the MSA works.

Outside of the MSA area, then existing native vegetation policies in the planning scheme will be addressed through the PSP. There is no need to duplicate policy in the PSP Guidelines. If there is a desire to duplication policy, then a cross reference to the existing policy should be provided to ensure consistency.

Recommendation 21

Refine the PSP Guidelines and the UGZ provisions and applied zones to better integrate PSPs with the MSA.

16. Employment Design

There is very limited analysis and policy support for the design and implementation of employment areas at the PSP level. There are a range of relevant employment design settings and more policy work to support these outcomes would be a welcome addition.

Recommendation 22

Undertake more policy development to give greater guidance for the planning of employment areas.

17. Planning for schools

The new standards for school provision do not appear to be achievable:

- 70% of dwellings located within 800m of government primary school
- 100% of dwellings located within 3.2km of a govt secondary
- 80% of dwellings located within 800m of a community facility
- 80% of dwellings located within 800m of a heath facility.

The VPA should demonstrate its modelling that indicates how these standards can be achieved. It would be better to explain in more detail the decision guidelines for locating these facilities within the centre of their walkable catchment, rather than just numerical standards.

Many of the newly introduced objectives and initiatives will require co-ordination and acceptance from responsible agencies at all levels before they effectively deliver the intended outcomes for new communities.

Recommendation 23

Undertake modelling of approved PSPs to determine whether the new standards proposed for schools are achievable in future PSPs.

18. Planning for Heritage

The approach to heritage needs more discussion and development. The reference to preparation of a preliminary Cultural Heritage Management Plan is not supported. Developers prepare these at the permit stage where required. Planning authorities are not tasked with this role. A more specific and nuanced description of how Aboriginal Cultural Heritage is managed through the planning and design process, including outside the PSP process is appropriate.

There is insufficient policy work around how post-contact heritage, including rock walls should be addressed through PSPs. These areas would each benefit from a practitioners guide being prepared.

Recommendation 24

Refine the heritage provisions to reflect existing regulatory requirements and to improve guidance around rock walls which are common in Melbourne's west and north.

19. Optimising Use of Encumbered Land

A new approach is required for how encumbered land can be designed to maximise its utility to support more compact and walkable communities and to get more out of finite urban land. For example, greater use of waterway edges as parkland could be implemented through design guidelines that make better use of land, if a more integrated approach to waterway maintenance is created.

Recommendation 25

Refine the PSP Guidelines around open space planning to deliver a more integrated approach to optimise use of encumbered land.

20. Development Staging

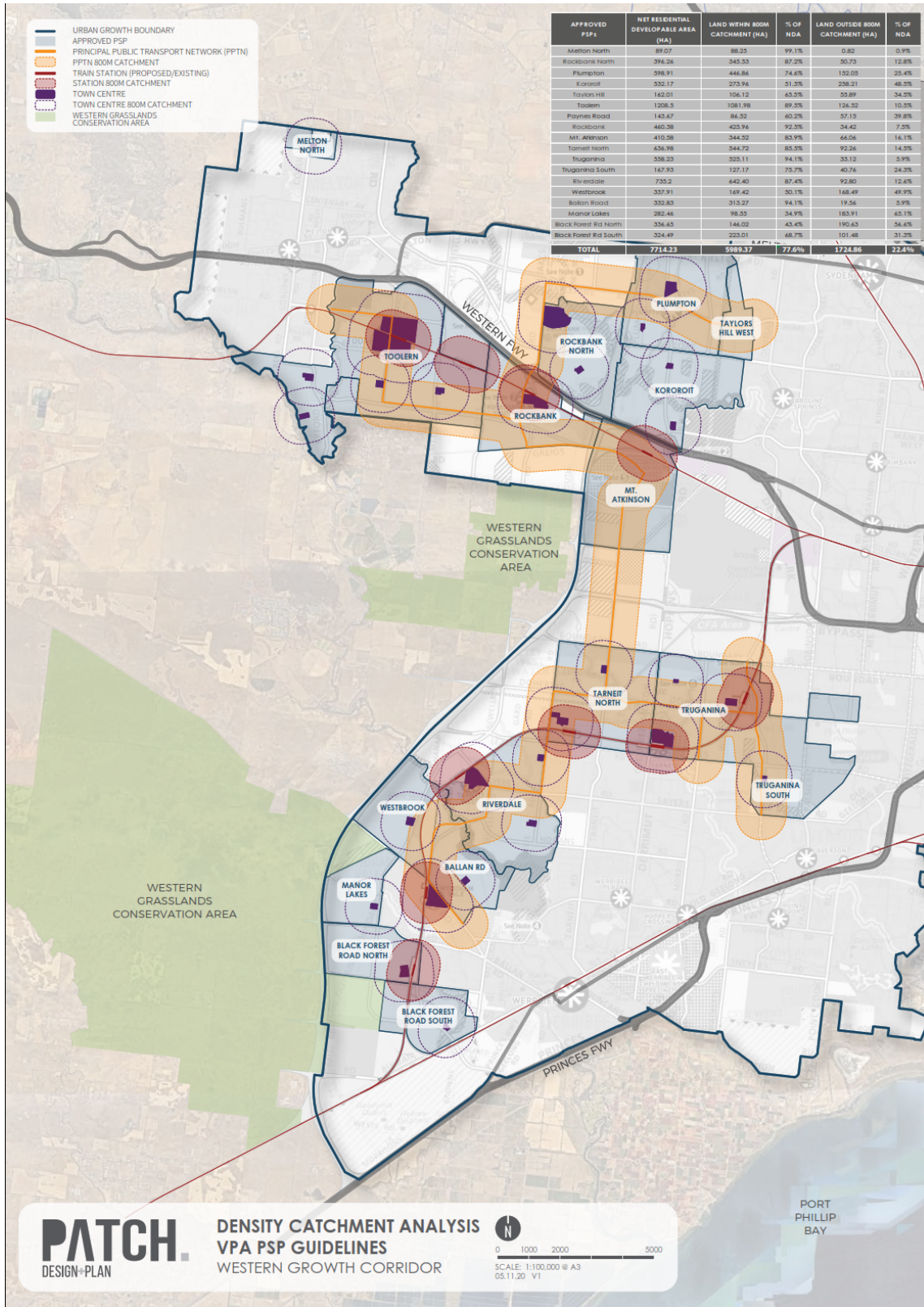
UDIA Victoria would like to hold discussions with the VPA around how to introduce mechanisms into the legislation, the PSPs and ICPs to facilitate the activation of development.

Road widenings, intersection land and services extension easements all need more facilitative processes. PSPs for example could address s36 processes to activate the orderly and economic development of land and could more routinely apply Public Acquisition Overlays for drainage and key road access sites.

Recommendation 26

Refine the PSP Guidelines and template to introduce a new provision to identify road widening, drainage and other acquisitions to better integrate and activate s36 of the Subdivision Act.

Attachment 1: Western Growth Corridor Density Analysis





Draft Precinct Structure Plan Guidelines – Victorian Planning Authority

Technical Response on Guideline Content

Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
F.1 Housing Diversity		<p>T1 PSP should facilitate increased densities with a minimum of 30 dwellings or more per Net Developable Hectare (NDHA) where located within an 800m walkable catchment of an activity centre, train station or Principal Public Transport Network (PPTN) (or similar).</p> <p><i>Source: VPA target (density)</i></p> <p><i>Clause 56.04-1 (walkable catchments)</i></p>	<p>Housing Plan to identify walkable catchments to activity centres, train stations and PPTN.</p> <p>OPPORTUNITY Variations to walkable catchment distances if there is a compelling land use or strategic reasons to do so.</p>	<p>T1 is strongly opposed in its current form. It is well above the densities sought by Plan Melbourne.</p> <p>UDIA Victoria would welcome discussions to explore amendments to the density provisions. There are wide differences in workability of higher densities between existing rail, proposed rail, different size and strength of activity centres and different PPTN services. A more nuanced policy is required.</p>
		<p>T2 PSP should facilitate increased densities with a minimum of 20 dwellings or more per NDHA across the entire PSP area</p>	<p>How to Test: Housing Plan to identify density 'target' within each area of the plan, achieving the overall target density across the PSP. Housing table to quantify likely housing yield.</p> <p>OPPORTUNITY Density targets may be more nuanced to provide greater diversity of housing outcomes (e.g. opportunities for higher densities within immediate catchment of activity centres or on strategic sites, and opportunities for lower densities</p>	<p>UDIA Victoria can support an increase in densities across the entire PSP area to 17-20 dwellings per hectare. Higher dwelling densities would occur adjacent to existing major town centres and rail stations. This would see a 10% increase in average densities currently being achieved which is a reasonable and measured policy step to take.</p>



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
			to respond to landform or other place specific objectives) and to respond to likely timing of delivery (i.e. a market-sensitive response).	
	F1.1 Residential density should achieve higher densities closer to existing or proposed jobs, services and high-quality public transport		Housing Plan to identify walkable catchments to activity centres, train stations and PPTN. Innovation Opportunity Practitioner Toolkit Variations to walkable catchment distances if there is a compelling land use or strategic reasons to do so.	F1.1 should be amended. Consideration needs to be given to the timing of proposed jobs, services and high-quality public transport. It is unreasonable to expect provision of higher densities years ahead of the attractor being in place.
	F 1.2 Target densities should be achieved in the long term. The arrangement of residential densities should be cognisant of likely development staging and market acceptance of proposed densities in the short-to-medium term.		The Future Place-based Urban Plan and Housing Plan should be informed by likely development staging.	UDIA Victoria Would welcome discussions around how development in and around rail stations and activity centres can be managed to allow for longer term evolution to higher densities over time.
	F 1.3 Different types of housing needed to meet the current and future demands of the community, municipality and region should be encouraged. Housing types should consider		Place-specific Guidelines should identify how and where diverse housing forms will be supported. Consider nominating locations of preferred housing forms on the Housing Plan where appropriate.	UDIA Victoria would welcome close collaboration with industry to explore ways to achieve greater diversity of housing in outer Melbourne. We should though recognise and celebrate the diversity that has been developed over the last 5 years and is continuing to evolve in a positive



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
	the physical form of housing (detached housing, terraces, apartments, etc.), the type of housing (single family, group accommodation, retirement living, etc.), tenure options (freehold, rental, social housing, etc.) and size/composition (scale, number of bedrooms, etc.).		Consider how zones/applied zones and the Small Lot Housing Code can be used to encourage diverse housing outcomes. Innovation Opportunity Practitioner Toolkit	direction.
	F 1.4 Small office/ home office/ live-work housing (home-based businesses) should be supported within residential areas.		Housing Plan and Guidelines to identify locations or parameters where the housing forms are encouraged to be designed to support home-based business	Agree.
F.2 Ability to age in place				
	F 2.1 Retirement villages or residential aged care facilities should have safe and convenient access to commercial and community facilities, services and public transport.		Housing Plan and Place-specific Guidelines should nominate preferred locations or specific parameters regarding villages/ facilities where known or appropriate. Encourage the creation of super lots with incentives to deliver affordable and accessible retirement or residential aged care housing. (e.g. Section 173 agreement supporting greater densities to offset cost/ risk of providing specific	Agree. However, these communities usually have a community bus that transports residents to hubs nearby and so location can be more flexible. Aged care services are being delivered by the market and there is no need for micro-management through the PSP process. Encouragement of delivery would be supported.



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
F.3 Affordable housing options		T3 Set a minimum target in accordance with the Affordable Housing Practice Note.	<p>housing type).</p> <p>Housing table to quantify likely proportion of affordable housing (refer to 3.1).</p> <p>OPPORTUNITY Engagement with community and social housing providers should explore opportunities for the provision of affordable housing, including opportunities for integration of affordable housing with community infrastructure. Landholders willing to enter into voluntary agreements (refer to 3.2), may negotiate to deliver affordable housing in key locations as part of a broader vision. Meeting the affordable housing targets should not render the proposed development economically unviable or negatively impact the affordability of other housing.</p>	Refer UDIA submission to the Government around affordable housing.
	F 3.1 Affordable housing should be located in areas that have convenient access to commercial and community facilities, services and public transport.		Affordable housing needs and likely affordability conditions should be investigated during Stage 3 and 4 technical reporting. The housing table should quantify the likely proportion of housing that will meet the affordability definition (refer to T3). Activity Centre Frameworks (where applicable) should provide	As above.



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
			<p>guidance on the provision of affordable housing.</p> <p>Innovation Opportunity</p> <p>Practitioner Toolkit</p>	
	<p>F 3.2 The PSP should support existing planning mechanisms to support delivery of affordable housing (e.g. Section 173 agreements).</p>		<p>Place-specific Guidelines should identify the preferred approach to entering into voluntary Affordable Housing Agreements, if appropriate. This approach should then be implemented via the zone schedule</p>	<p>As above.</p>
	<p>F 3.3 The PSP should identify land that has been or will be designated for social housing by the State Government.</p>		<p>Consult with relevant government departments, agencies and community organisations during co-design phase. Sites should be nominated on the Housing Plan where appropriate</p>	<p>Supported provided the State has the resources to acquire land designated at market value.</p>
<p>F.4 Safe streets and spaces</p>	<p>F 4.1 Nominated densities are supported by appropriately scaled and composed streets, blocks and open spaces.</p>		<p>A Future Place-based Urban Plan should consider variations to urban form and the scale and composition of streets to support diverse housing and increased densities. Consider using illustrative diagrams, cross-sections, land budget, yield analysis and Place-specific Guidelines to illustratively depict the preferred density and subdivision design outcomes to align with the vision. Refer to the relevant practice note</p>	<p>The PSP is a structure plan, it is not a subdivision masterplan.</p> <p>Some of these issues go to the detail of what permit applications need to do and would be best dealt with through changes to ResCode rather than trying to make PSPs do that work.</p>



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
			<p>within the Practitioner’s Toolbox for guidance on implementing the Movement and Place Framework and developing a Future Place-based Plan and Housing Plan.</p> <p>SEE ALSO PSP HALLMARK Innovation Opportunity</p>	
	<p>F 4.2 The design of the public realm should ensure these spaces feel safe and are inviting to pedestrians and cyclists.</p>		<p>Consider using illustrative diagrams and Place-specific Guidelines to express preferred public realm outcomes.</p>	<p>This can be a generic guideline that is in ResCode and that permits through their urban and landscape design response can be assessed against.</p> <p>A PSP is a structure plan, not a subdivision or landscape design.</p> <p>If s96A permits are prepared in concurrency, then they can demonstrate these things through a concurrent process.</p>
	<p>F 4.3 Permeability of the street network for pedestrians and cyclists over vehicles should be prioritised in areas where a higher intensity and density of land uses are proposed.</p>		<p>Consider using illustrative diagrams and Place specific Guidelines to express options to enhance permeability at the local neighbourhood scale.</p>	<p>This is an important ResCode or subdivision permit issue. This is not a structure plan issue.</p>
	<p>F 4.4 Large-format ancillary uses, such as large sporting reserves and parks, should be located outside or towards the edge of the walkable catchment of local</p>		<p>Nominate uses on the Future Place-based Structure Plan. Land budget/yield analysis should demonstrate the efficiency of residential opportunities within</p>	<p>Strongly agree. UDIA Victoria also seeks support from Government to develop vertical schools and community facilities and to make better use of encumbered land for community outcomes to</p>



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
	centres.		walkable catchments of local centres.	support the drive for density and vibrancy.
F.5 Walkability and safe cycling networks		T4 Bicycle Movement Off road bicycle paths should be provided on all connector streets and arterial roads, connecting where possible with off-road trails within open spaces and the surrounding bicycle network. Source: Clause 56.06-2	<p>Cross-sections and the Movement Network Plan demonstrate the provision of paths on all connector and arterial streets, as well as connections to off-road trails.</p> <p>OPPORTUNITY Diversity in both streetscape and user experience should be considered when determining the configuration of bike paths in cross-sections and their routes through neighbourhoods. The purpose of the place and the character of the urban form may offer opportunities for alternative approaches to providing a direct and connected bicycle network (for example, shared zones in highly urbanised spaces).</p>	This is a standard requirement in current PSP's and can be brought forward in the new Guidelines.
		T5 Street Design All streets should have footpaths on both sides of the reservation.	<p>All street cross-sections show pedestrian paths.</p> <p>OPPORTUNITY The purpose of the place and the character of the urban form may be suitable for alternative path approaches (for example, low-density areas may be better suited to a more rural style cross-section, with different path provision).</p>	<p>This is a ResCode issue and is not a structure plan issue.</p> <p>Structure plans are about locating the main structural elements and should be driven by a site responsive design. This detail can rest elsewhere in the scheme.</p>



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
		<p>T6 Pedestrian and cyclist crossings provided every 400-800m along arterial roads, rail lines, waterways and any other accessibility barriers.</p>	<p>Movement Network Plan shows the distances between crossings</p> <p>OPPORTUNITY Variations where crossing is unfeasible or results in unacceptable environmental impacts, or where the connection offers limited practical community use</p>	<p>While this outcome is desirable, it is not always possible or financially appropriate.</p> <p>This standard needs to be further developed to be useful in these more complex net community benefit and cost benefit assessments.</p>
	<p>F 5.1 Streets should be carefully and deliberately designed (in terms of their scale, design speeds, configuration and landscaping treatments) to respond to the site context (e.g. topography, natural features), proposed land use context (e.g. future urban form, intensity of activity) and to support early habits for walking and cycling. This includes: » Direct, comfortable and legible off-road walking and cycling paths that connect open spaces and key destinations.</p> <p>» Pedestrian crossings on key pedestrian routes, all legs of signalised intersections in activity centres, and at appropriate bus stops.</p> <p>» Minimal impediments to safe</p>		<p>A Movement Network Plan should show routes, connections, crossings and categories of path types such as off-road, shared, etc. A greater intensity of walking and cycling options should be shown in areas of higher activity. Street cross-sections should show path dimensions and how the street environment will support walking and cycling</p>	<p>Agree. This can be addressed partially at structure plan stage and more fully at permit and detailed street design stage.</p>



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
	<p>and comfortable pedestrian and cyclist movement (such as slip lanes, cross-overs and roundabouts) on high volume routes.</p> <p>» Greater access to walking and cycling options in areas of higher-intensity activity.</p>			
F.6 Movement and place		<p>T7 The arterial road network should provide a 1.6km road grid with safe and efficient connections, adjusted where necessary to reflect local context.</p>	<p>Movement Network Plan demonstrates the distances between arterial roads.</p> <p>OPPORTUNITY A ‘Movement and Place’ approach may identify opportunities to vary this requirement to enhance the role of streets as places without compromising their ability to facilitate movement. Emerging technology may influence changes in the movement network by encouraging behaviour changes, increased efficiencies and alternative infrastructure needs. Variations to targets may be explored where these technologies can be confidently harnessed.</p> <p>SEE ALSO MOVEMENT AND PLACE IN VICTORIA</p>	<p>Agree. This standard could be revised to properly reference the role of the Corridor Plan which provides for this outcome at a strategic level.</p>



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
	<p>F 6.1 Adopt a ‘Movement and Place’ approach to identifying an arterial and connector road network that provides a supportive context for the proposed type and intensity of land uses. The transport and movement network should:</p> <ul style="list-style-type: none"> » provide a road hierarchy that supports the purpose of the place and preferred urban form » prioritise the needs of pedestrians and cyclists » facilitate access to public transport modes and emergency services » balance the access needs of waste collection vehicles with the amenity impacts on the place. 		<p>Prepare a Movement and Place Assessment during Stage 4: Plan Preparation. Show application of the Movement and Place assessment on the Movement Network Plan (including a road hierarchy) and other supporting diagrams and cross-sections. Prepare cross-sections that demonstrate effective application of the Movement and Place approach.</p>	<p>Agree.</p>
	<p>F 6.2 Land should be planned and reserved for the future expansion of road and public transport network needs. The minimum appropriate number and width of traffic lanes should be provided based on safety, traffic volumes and speed, and should have regard to the ‘place’ role of the network.</p>		<p>Land required in the future should be identified in the Precinct Infrastructure Plan</p>	<p>Agree. There is a need to take the Draft Road Design Policy and the Street Policy of DoT forward through further collaboration with industry.</p>



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
F.7 Local public transport		T8 95% of dwellings should be located within either of the following walking distances: <ul style="list-style-type: none"> • 800m to a train station • 600m to a tram stop; or • 400m to a future bus route 	Movement and Network Plan maps out the walkable distances from train stations and bus/tram routes and tabulates the number of dwellings within these distances. Walkable distances consider barriers, for example large expanses of carparking surrounding stations. Percentage of dwellings as an indicator of the density of neighbourhoods. OPPORTUNITY The public transport network should consider emerging technologies and behaviour change, which may allow for more flexibility in the location and provision of high-quality public transport services. SEE ALSO MOVEMENT AND PLACE IN VICTORIA	The words ‘future bus route’ should be adjusted to refer to ‘bus capable roads’. The Government does not plan bus routes specifically at PSP stage, but rather sets the structural conditions for future delivery of routes and services through a suitable road grid.
	F 7.1 The public transport network identifies public transport as the preferred means of transport, when cycling or walking is not possible or practical (i.e. distance or physical mobility). This includes: <ul style="list-style-type: none"> » high-quality public transport in areas of high land use intensity, along high-trafficked routes, and connecting to key destinations internal and external to PSP 		The Public Transport Plan identifies: <ul style="list-style-type: none"> » high capacity connections to key destinations internal and external to the PSP area » prioritisation measures along high capacity routes (which could be illustrated in cross sections) » existing and proposed public transport networks surrounding the PSP area 	Agree. It is important for Government to allocate funds for early provision of bus services and to increase service frequency so that other sustainability goals can be met.



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
	<p>area, such as major activity centres and employment areas » local public transport routes through all neighbourhoods (e.g. on bus-capable connector streets).</p>		<p>» routes that should be further explored to address service gaps and better connect key destinations</p> <p>» barriers to walking/cycling within PPTN walkable catchments (e.g. large areas of carparking) and measures to overcome access limitations</p> <p>» potential staging of public transport provision where appropriate.</p>	
	<p>F 7.2 Provision and timing of the public transport network should consider: » the likely development staging of the PSP area; and » its role in facilitating higher intensity uses.</p>		<p>Consultation must be undertaken with public transport providers and likely developers during all stages of PSP preparation. A Public Infrastructure Plan should identify indicative timeframes for delivery.</p>	<p>This is a Government infrastructure co-ordination and service delivery issue, not a structure plan or development issue.</p>
<p>F.8 Well connected to public transport, jobs & services within the region</p>		<p>T9 The provision of land for local employment and economic activity should be capable of accommodating the minimum job density target of one job per dwelling located within the wider growth corridor.</p>	<p>Indicative job ‘yields’ based on land use budget using:</p> <p>» residential areas – 10% (e.g. jobs from schools, community facilities, home occupation)</p> <p>» activity centres and surrounding small local enterprise (commercial/mixed use) areas and dedicated health and education precincts – 20%</p> <p>» employment areas – 70%.</p> <p>OPPORTUNITY Alternative</p>	<p>Supported in principal. Government should continue to work with industry around how employment can be catalyzed in the growth corridors.</p>



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
			<p>approaches to employment provision may be determined at the Vision stage of PSP development. For Regional and State Significant Industrial Land, the employment provision is to be determined and informed by state policy objectives. The employment target and job yields should have regard to the vision and any alternative approaches to local employment provision (for example, linkages to nearby regional level employment areas, priority focus on public and private investment into significant employment generating uses, etc.). Alternative employment approaches should be supported by detailed analysis and specific controls, initiatives and investment plans where appropriate.</p>	
	<p>F 8.1 Preferred local, sub-regional and/or regional economic development opportunities should be identified based on the current and future strategic conditions of the PSP area (including advantages and challenges). These areas should be located, designed and staged to:</p>		<p>A technical analysis of employment needs and opportunities, including analysis of any potential barriers to employment growth, should be undertaken in Stage 4: Plan Preparation. Where relevant, a Place-based Vision should target proposed industry types and the urban form required to support employment. An Employment Plan should identify key</p>	<p>Supported in principal.</p>



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
	<ul style="list-style-type: none"> » meet the future economic and employment needs of the state » support the types of uses required to support targeted growth industries » be located in areas adjacent to, or in close proximity to, arterial roads, public transport and freight networks » provide diversity in economic opportunities. 		<p>areas for economic activity. The plan should demonstrate locational advantages and opportunities for linkages, including access to roads, public transport and freight networks. Zones/applied zones should be selected that support intended employment types and appropriate interfaces with adjoining residential areas. Refer to the relevant practitioner’s tool for guidance on applying zones. Place-specific Guidelines should be considered that will express preferred floor plates to support the type of industries planned for the PSP area. NB: Depending on the strategic context, this principle may not be relevant to all PSPs.</p>	
	<p>F 8.2 Align with state, regional and local industrial and commercial land identified in the Melbourne Industrial and Commercial Land Use Plan (MICLUP).</p>		<p>Analysis of the potential commercial and industrial zonings should be undertaken in reference to MICLUP, including guidance on purposes and zoning. State Significant Industrial Precincts (SSIPs) should provide strategically located land for major industrial development linked to the PFN and transport gateways. Regionally Significant Industrial Precincts (RSIPs) need to be planned for and retained as either key</p>	<p>Supported in principal.</p>



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
			industrial areas or as locations that can provide for, or transition to, a broader range of employment opportunities.	
	F 8.3 Locate complementary land uses adjacent to existing or future employment areas, particularly industrial employment areas.		On the Employment Plan, map the separation distances and identify potential interface considerations, such as conflicting land uses. Use Place-specific Guidelines to express preferred built form outcomes in separation distance areas and/or employment areas.	Supported in principal.
	F 8.4 Protect existing and future priority freight routes from conflicting land uses.		The Future Urban Structure identifies any existing or future priority freight route and maps the adjoining area for management. Within the adjoining area for management, the Future Urban Structure shows compatible uses and/or the guidelines express required built form outcomes.	We are unsure what ‘management’
	F 8.5 Protect existing agricultural land from conflicting land uses.		The Future Place-based Plan provides adequate separation distances between sensitive land uses and agricultural land. Use Place-specific Guidelines to address any potential conflicts with production operations on adjacent agricultural land.	Agree that interface between new urban areas and land outside the UGB needs to be considered at PSP stage.



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
F.9 Local employment opportunities	F 9.1 Locate and design mixed-use residential and employment areas to ensure residents and employees have access to public transport, local community and retail services, and open space.		Identify locations for mixed-use development on the Employment Plan. Zones/applied zones should support mixed use employment and residential land uses. Refer to the relevant practitioner's tool for guidance on applying zones.	Agree.
	F 9.2 Co-locate complementary commercial, retail, education, medical and other employment uses within or adjacent to activity centres.		Identify locations for diverse employment options on the Employment Plan and use guidelines to express preferred outcomes. Zones/applied zones should support diverse employment uses. Refer to the relevant practitioner's tool for guidance on applying zones.	Agree.
F.10 Local recreation spaces and facilities		<p>T10 The open space network should seek to meet the following minimum targets:</p> <ul style="list-style-type: none"> • Within residential areas (including activity centres): - 10% of net developable area for local parks and sports field reserves, plus 1 hectare per 12,000 residents projected for indoor sports and recreation facilities - 3-5% of net developable area set aside for local parks - 5-7% of net developable area set aside for sports field reserves. • Within dedicated employment and/or economic activity areas, 2% of the 	<p>» Quantify open space provision using land budget tables.</p> <p>» Open space contributions to be defined as Public Purpose Land in the ICP/DCP.</p> <p>OPPORTUNITY Enhance and optimise the role, function and use of existing open space land (e.g. existing sports reserves within the catchment) and encumbered land to be set aside for natural systems (e.g. conservation, waterways) landscape values or utilities easements. Variations to this target should consider how existing</p>	<p>Agree. This is consistent with the existing PSP Guidelines around open space provision.</p> <p>Support the concept of using schools and encumbered land more fully for a range of beneficial open space and community uses.</p>



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
		net developable area for local parks	reserves, natural systems or land for landscape values and even schools can be used in a manner that contributes to the overall place-based vision and meets the needs of the future community. An opportunity for a place-specific variation may be to make use of encumbered land (such as transmission easements) as a productive landscape (for example, community gardens or other urban agriculture) or other recreation uses. Innovation Opportunity	
		T 11 Open space and sports reserves should be located to meet the following distribution targets: <ul style="list-style-type: none"> • A sports reserve or open space larger than 1 hectare within an 800m safe walkable distance of each dwelling. • A local park within a 400m safe walkable distance of each dwelling. Source: Clause 56.05-2 (400m walkable distance) and VPA (800m walkable distance) Note: Includes sports reserves and public land that is encumbered by other uses but is capable of being utilised for open space purposes.	Open Space Plan (showing park sizes and walkable catchments) Place-specific variations may be considered where an alternative arrangement of open space is provided that will achieve a specific vision objective (for example, centralisation of open space into a large connected network that increases the overall value of the open space to the community through innovative design and other measures). Innovation Opportunity	Agree.



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
	<p>F 10.1 The open space network should include local parks that: » have a variety of sizes and proportions, generally ranging from 0.1 to 3 hectares » are located to enable access by local residents without having to cross significant barriers such as arterial roads, railways or waterways » provide a diversity of amenity experiences (both internal to the park and external interfaces that will provide an amenity context for development).</p>		<p>An Open Space Plan should show park sizes, preferred interfaces and walkable catchments (adjusted for significant barriers).</p>	<p>Agree. Some Council's do not support smaller parks being provided unencumbered open space credit. UDIA Victoria strongly supports this. Each PSP can then consider parks on their merit. For example, a small unencumbered park could be co-located with an encumbered constructed waterway which could provide for a more integrated and better outcome overall.</p>
	<p>F 10.2 Proposed sporting reserves should be located, designed and configured to be:</p> <ul style="list-style-type: none"> » targeted to forecast community needs » accessible » appropriately meeting their purpose, having regard to shared use opportunities » distinctive and responsive to local character and surrounding land use 		<p>A Community Needs analysis should be undertaken in Stage 4: Plan Preparation. An Open Space Plan should show sporting reserve size, purpose and walkable catchments.</p> <p>SEE GENERAL PRINCIPLE 11.1</p>	<p>Agree.</p>
	<p>F 10.3 A network of diverse open space should be provided</p>		<p>An Open Space Plan should show linkages and connections, any</p>	<p>Agree.</p>



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
	across the precinct that connect (via open space or major pedestrian/cycle links) to metropolitan or regional open space networks.		barriers to connectivity, and measures to overcome barriers.	
	F 10.4 The location and scale of open space should respond to and optimise integration with the existing topography, drainage channels, landscape features, biodiversity conservation areas and cultural heritage values.		An Open Space Plan should detail the features the open space network is responding to.	Agree.
	F 10.5 The public realm network should be located, configured and designed to enhance and optimise the role of encumbered or restricted public land (e.g. waterways, conservation, utility easements, schools) for multifunctional spaces and cater for a broad range of local users and visitors. Where possible, the provision of open space should be integrated with and/or link with waterways.		An Open Space Plan should identify possible functions of each space. This could also include the potential role and function of schools, waterways and/or floodways in contributing to the network. Place-specific Guidelines should express expectations with regard to landscaping outcomes in open spaces and the public realm. Innovation Opportunity	Agree. Too often encumbered land is treated through a silo lens of its main purpose. There is a great opportunity to pursue more integrated outcomes through good urban and landscape design.
F.11 Green streets and spaces		T12 Potential canopy tree coverage within the public realm and open space should be a minimum of 30%	A Public Realm Plan should illustrate and quantify canopy tree coverage, assuming typical tree species for the	Current street design standards do not allow for this performance target to be achieved. UDIA Victoria would like to work closely with the



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
		(excluding areas dedicated to biodiversity or native vegetation conservation).	<p>PSP area at maturity and during the summer months</p> <p>OPPORTUNITY Place-specific variations may be considered where a specific vision or objective is to be achieved through alternative landscaping approaches.</p>	<p>Councils and the VPA to develop workable new standards to boost urban greening and canopy on public land.</p> <p>Consideration should also be given to increasing use of groundcover vegetation in streets and parks to reduce the urban heat island and make for a more attractive and greener urban environment.</p>
		T 13 All streets containing canopy trees should use stormwater to service their watering needs.	<p>A Public Realm Plan and associated cross sections should identify the proposed approach to passive irrigation of street trees.</p> <p>OPPORTUNITY Alternative irrigation may be considered where it can be demonstrated through a comprehensive alternative plan (such as an Integrated Water Management Plan) that passive irrigation is either unnecessary or inferior to the proposed alternative.</p>	As above. It may be possible to irrigate some street trees from recycled water supply, and it may not be only stormwater that is used to irrigate trees and vegetation.
	<p>F 11.1 Design of the public realm, public infrastructure and open space should:</p> <p>» support climate change adaptation and integrated water management opportunities (e.g.</p>		<p>A Community Needs Analysis should be prepared in Stages 3/4 to determine appropriate open space functions for the future community.</p> <p>An Open Space Plan should identify different public realm design intent</p>	Agree. The main issues are around street design, Council acceptance of landscape proposals with increased urban greening and Council agreement to irrigation of street trees and parkland gardens.



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
	<p>greening and tree canopy for cooling and shade and to manage urban heat island effect, integrated use of water resources, renewable energy infrastructure, etc.).</p> <p>» be responsive to the land use context and interfaces (types of uses, intensity of uses, etc.). » be sensitive and responsive to interfaces with valuable rural landscapes and green wedges.</p> <p>» be designed to encourage passive surveillance by adjoining land uses and activity.</p> <p>» be responsive to the different needs of the forecast future community.</p> <p>» identify opportunities to incorporate productive vegetation, community gardens or urban agriculture where possible.</p> <p>» identify opportunities to incorporate existing healthy and safe canopy trees where possible</p>		<p>for open space and public realm areas within the PSP, including any measures that have been incorporated to respond to climate change e.g. greening and cooling, integrated water management, renewable energy, productive vegetation, etc.</p> <p>SEE ALSO GENERAL PRINCIPLE 10.2</p> <p>SEE ALSO GENERAL PRINCIPLE 10.5, 11.2, T9 AND T11</p>	<p>Developers would prefer to boost urban greening but have been held back by Council regulations and requirements.</p>
	<p>F 11.2 Aboriginal cultural heritage values of significance</p>		<p>A preliminary Cultural Heritage Management Plan should be</p>	<p>The UDIA Victoria does not support the VPA preparing preliminary Aboriginal Cultural</p>



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
	should be protected and managed in accordance with the Aboriginal Cultural Heritage Act.		prepared in Stage 4: Plan Preparation Consider locating nominated heritage sites on the Future Place-based Urban Plan and place specific guidelines to express how cultural heritage is to be protected and managed.	heritage Management Plans through the PSP process. The Aboriginal heritage is addressed through Aboriginal Cultural Heritage Management Plans prepared and managed by development proponents at the planning permit stage.
	F 11.3 Cultural and post-contact heritage values and features (including buildings, structure, trees, gardens, historical archaeology sites and relics) should be considered and incorporated into the design of the public realm or otherwise protected or celebrated, where appropriate		A heritage assessment should be prepared in Stage 4: Plan Preparation. Consider Place-specific Guidelines, examples and/or diagrams to express how the cultural heritage outcomes are to be delivered.	Agree.
	F 11.4 Public land set aside for utility or service infrastructure should be optimised and designed to be multifunctional where possible; providing land for infrastructure, amenity, environmental systems and for passive recreation (where safety risks can be managed). Infrastructure should be designed and located to make efficient use of existing asset capacity and to withstand the		Consultation must be undertaken with utility and service agencies to identify opportunities for innovative approaches to multifunctional use of space and co-location opportunities. An Open Space Plan or Public Realm Plan should identify any utility or service infrastructure. Innovation Pathways	Agree.



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
	impacts of predicted climate change.			
	F 11.5 Wherever feasible, existing overhead powerlines should be placed underground in a manner that will allow canopy tree planting within the public realm		A Precinct Infrastructure Plan should identify potential timing and funding of any powerline upgrades (where relevant).	This should be adjusted to refer to 22kv lines only.
F.12 Environmental and biodiversity value		T14 All conservation areas identified in relevant state strategies should be retained in accordance with relevant legislation.	Open Space Plan should show conservation areas in accordance with relevant legislation OPPORTUNITY When making a judgement about the quantity of native vegetation retained, opportunities to improve the resilience of biodiversity systems and native vegetation against the impacts of climate change through innovative approaches should be considered as an important factor (i.e. the long-term resilience of the native vegetation may be more important than the quantity retained initially).	Agree, though the details would be addressed at the PSP stage.
	F 12.1 Conservation areas and/or reserves should be provided in accordance with the relevant legislation. Their biodiversity value and their amenity value to the future		An Open Space Plan and/or a Public Realm Plan should identify the location and buffers to conservation reserves. Consultation must be undertaken between Department of Environment, Land, Water and	Agree.



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
	<p>urban community should be carefully considered and balanced. Conservation reserves should have appropriate transitions and buffers between areas of high conservation value and urban land uses to support the long-term sustainability of conservation areas and reserves. Where the location of infrastructure within areas of biodiversity value cannot be avoided, its location, design and construction should reduce any potential impacts while also balancing infrastructure cost implications.</p>		<p>Planning (DELWP) and relevant servicing agencies to identify innovative ways of balancing environmental impacts, and infrastructure needs and costs. Where appropriate, a Conservation Area Concept Plan should provide further detail about the management requirements of conservation areas (in accordance with relevant legislation), and any impacts on urban land. Management approaches should appropriately balance biodiversity protection with objectives to enhance public accessibility to natural spaces. In areas where the DELWP Biodiversity Conservation Strategy does not apply, federal referrals are required for any matters that are listed as significant.</p> <p>SEE ALSO DELWP BIODIVERSITY CONSERVATION STRATEGY</p>	
	<p>F 12.2 Removal of native vegetation should be avoided, minimised and/or offset in accordance with the relevant legislation. Where possible, any native vegetation to be retained that is not within designated conservation areas should be</p>		<p>An Open Space Plan and/or a Public Realm Plan (or other diagrams) should identify opportunities to retain native vegetation within the public realm and provide guidance on their protection within an urban setting.</p>	<p>Avoid, minimise and offset policies do not apply to the MSA area. The policies have been implemented already through the BCS. This part of the Guideline should be revised to refer to areas outside of the MSA.</p> <p>Areas of scattered Red Gums in Melbourne’s</p>



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
	appropriately integrated into the urban structure of the area.		SEE ALSO DELWP BIODIVERSITY CONSERVATION STRATEGY	North can be designed into the future urban fabric, but this is through local ecological and landscape design considerations. This policy needs to be revised to be more nuanced and specific.
	F 12.3 Future neighbourhoods should be planned to strengthen the resilience of communities to bushfire risk through appropriate planning and design that prioritises protection of human life.		A Bushfire Risk Assessment should be undertaken as part of Stage 4: Plan Preparation. Consultation with the Country Fire Authority (CFA) should be undertaken early in the process to understand local bushfire risks and management approaches. Future Place-based Plan and Housing Plan must seek to minimise and mitigate risks to the safety of residents and workers from bushfires. Consider Place-specific Guidelines to incorporate measures to minimise and mitigate bushfire risk	Agree.
F.13 Sustainable water		T15 IWM Solutions contribute towards targets from the relevant IWM Catchment Strategy and meet Best Practice Environmental Guidelines for Urban Stormwater (BPEM).		Agree.
	F 13.1 Urban planning, including water systems, should have regard to the seven key Integrated Water Management (IWM) principles:			Agree.



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
	<ul style="list-style-type: none"> » Provide a safe, secure and affordable supply of water in an uncertain future. » Use effective and affordable wastewater systems. » Optimise opportunities to manage existing and future flood risks and impacts. » Maintain and enhance healthy and valued waterways and marine environments. » Maintain and enhance valued landscapes for health and wellbeing purposes. » Strengthen community knowledge and local values and reflect them in place-based planning. » Support jobs, economic benefits and innovation. 			
	<p>F 13.2 Drainage management measures should have sufficient capacity to manage and treat 1 in 100-year flows that are expected to occur as a result of predicted climate change, meeting the requirements of the relevant authority. Nature-based</p>			<p>Agree. Our members would like to be central to the creation of any new design standards for a more ecological engineering approach to design.</p>



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
	engineering solutions should be prioritised over 'business as usual'.			
F.14 Local schools and community infrastructure		<p>T16 The location of new education and community infrastructure should achieve the following accessibility targets:</p> <ul style="list-style-type: none"> • 70% of dwellings located within 800m of a government primary school. • 100% of dwellings located within 3,200m of a government secondary school. • 80% of dwellings located within 800m of a community facility. • 80% of dwellings located within 800m of a health facility. Note: A health facility may include areas where a general practitioner would be capable of operating (e.g. commercial or mixed-use zone). 	<p>A Community Infrastructure Plan demonstrating and quantifying accessibility within relevant catchment areas.</p> <p>OPPORTUNITY The distribution of education and community infrastructure may vary where there are demonstrated commitments to innovation in education and community service delivery models. Note: These should not be within the measurement length for a gas trunk pipeline.</p> <p>Innovation Opportunity</p>	<p>We would like to see some modelling using existing PSPs in each growth corridor to see whether these standards are appropriate and workable.</p> <p>On the face of it the new standard appears to be workable, though there should be flexibility based on net community benefit to vary from them where necessary.</p>
	<p>F 14.1 Education and community facilities (i.e. schools, community centres, health facilities and sport reserves) should:</p> <p>» be co-located within</p>		<p>A Community Infrastructure Plan should show the preferred location of education and community facilities and identify their locational advantages. Note: PSPs are only capable of accommodating the provision of infrastructure. Timing of</p>	<p>Agree. This policy reflects the existing policies.</p>



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
	<p>community hubs.</p> <ul style="list-style-type: none"> » have good visual and physical links to a local centre. » be located on connector streets, linked by walking and cycling paths, and in close proximity to high-quality public transport where possible. » be located away from gas trunk infrastructure. School sites should not be located closer than 400m from to high voltage transmission easements. 		<p>delivery is subject to the discretion of the relevant service provider.</p>	
	<p>F 14.2 High intensity facilities such as libraries, childcare centres, justice/emergency services and community centres should be located within close proximity of an activity centre or have good visual and physical links to an activity centre and active transport routes.</p>		<p>Consultation with agencies and service providers should explore spatial and locational needs of these facilities, as well as likely delivery models. A Community Infrastructure Needs Background technical report should be prepared in Stage 4: Plan Preparation, identifying the potential locational synergies available in the PSP area.</p>	<p>There should be flexibility for childcare centres and smaller scale medical facilities to be located on connector streets throughout PSP areas. Most Councils already have non-residential uses in residential areas policies that deal with most of these issues.</p>
	<p>F 14.3 Upgrades to existing infrastructure and/or the provision of new infrastructure should align with council and/or agency service plans and provision guidance and reflect</p>		<p>A Community Infrastructure Needs Background technical report should be prepared in Stage 4: Plan Preparation, identifying spare capacity within the catchment and exploring integrated delivery</p>	<p>Agree in principal.</p>



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
	the most cost-efficient approach to addressing service needs. This includes making use of any spare capacity of existing facilities within the catchment area and pursuing integrated service planning and delivery opportunities.		opportunities. Consultation with community infrastructure service providers should be undertaken to explore integrated delivery opportunities. SEE ALSO PRACTITIONER'S TOOLBOX: COMMUNITY INFRASTRUCTURE NEEDS GUIDELINES	
	F 14.4 Where feasible, education and community infrastructure should provide space for not-for-profit organisations. Opportunities should also be explored in town centres for space that not for profits may be able to rent.		Consultation with not-for-profit organisations and Department of Education and Training (DET), council and other community land use managers, as well as developers of town centres, should be undertaken to identify and co-design opportunities for shared facilities.	Agree in principal. However, PSPs and permits cannot seek to regulate specific tenancies.
	F 14.5 The location of emergency services should be within easy access to the arterial road network to maximise coverage and reduce response times.		A Community Infrastructure Plan should identify the preferred location of emergency services in consultation with those services	Agree. Where a PSP seeks to make specific designations of public uses, that should be supported by a PAO and an acceptance that GAIC WIK or other compensation will be available to owners when the lot is created.
F.15 Lifelong learning opportunities	F 15.1 The amount of land allocated for education and community facilities, and their role and function, should be determined in consultation with service providers and should respond to the local context, the		A Community Infrastructure Needs Background technical report should be prepared in Stage 4: Plan Preparation, identifying likely community needs. Consultation with community infrastructure service providers should be undertaken to	Agree. There is a limit to the amount of land that is reasonable to be provided through PSPs and ICPs. There is a need for public authorities to also create more vertical space so that the entire urban environment can be made more efficient and density increased over time.



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
	broader strategic context, and the forecast service needs of the new or changing community.		explore opportunities to respond to changing needs in an innovative way.	
	F 15.2 The location and design of education and community facilities should cost-effectively maximise functional use, flexibility, safety, amenity and operational efficiency (e.g. shared use of facilities with active open space, alternative funding models, adaptable design models, community access to school grounds, etc.).		A Community Infrastructure Plan should show any proposed agreement for shared use. A Precinct Infrastructure Plan should identify timing, delivery responsibility, and potential funding sources and commitments to shared delivery and use of facilities. Innovation Opportunity	As above.
	F 15.3 Opportunities for non-government schools and tertiary education facilities should be identified through engagement with the non-government school and tertiary education sectors.		Consultation with non-government education providers should be undertaken early in the PSP process. A Community Infrastructure Plan should identify any non-government education facilities (where known).	Agree. Where a PSP seeks to make specific designations of public uses, that should be supported by a PAO and an acceptance that GIAC WIK or other compensation will be available to owners when the lot is created.
	F 15.4 Future opportunities for higher order health and education (e.g. tertiary education) should be considered during the PSP process and land areas or 'areas of strategic interest' should be nominated where known		Consultation with higher order health and education providers should be undertaken early in the PSP process to explore any opportunities for these sites to be nominated and for partnerships to be forged. A Community Infrastructure Plan should identify any facilities (where known) and identify any catalyst	Agree. Where a PSP seeks to make specific designations of public uses, that should be supported by a PAO and an acceptance that GIAC WIK or other compensation will be available to owners when the lot is created.



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
			<p>impacts of these facilities.</p> <p>SEE EXAMPLE HIGHER ORDER HEALTH AND EDUCATION AS A CATALYST FOR LAND USE INNOVATION EXAMPLE</p>	
F.16 Thriving local economies		T17 80-90% of dwellings should be located within 800m of an activity centre.	<p>An Activity Centre plan should show and quantify the percentage of dwellings within 800m catchments.</p> <p>OPPORTUNITY Alternative distributions of activity centres may be considered where it can be demonstrated that the variation will make a positive contribution to a 20-minute neighbourhood (and not simply improve commercial outcomes). For example, variations may seek to: » create a distinctive character » respond to the location of other existing or planned centres » take an innovative approach to delivering infrastructure, and climate change adaptation responses » provide enhanced opportunities for vibrancy, diversity and intensity of land uses (including housing, community uses, not-for-profit uses).</p>	<p>This is a change to the existing standards. We are unsure what the implications are. It may be that an increased number of smaller centres are required to fill the gaps. The issue is that these smaller centres are the weakest link in the retail hierarchy and may not be viable.</p> <p>The existing standard should be retained unless modelling by the VPA can prove that this is a suitable standard.</p>
	F 16.1 New activity centres should be located, scaled and designed to:		Undertake a Retail Needs Assessment technical report to understand likely floorspace needs.	Agree.

Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
	<ul style="list-style-type: none"> » prioritise pedestrian movement with access to all possible forms of transportation » create a 'sense of place' through high-quality and engaging urban design, including maximised activation of uses at ground level » be sustainable, adaptable and responsive to local conditions and forecast climate change conditions » designate land for an appropriate and viable amount of retail, civic and commercial floorspace. 		<p>An Activity Centre Plan should identify location, scale and role of activity centres and provide detail of the locational and amenity advantages of each centre.</p>	
	<p>F 16.2 The allocation and arrangement of land uses within new activity centres should:</p> <ul style="list-style-type: none"> » seek to provide a full range of services (including anchor retail) » create a focal point and heart of the centre » provide appropriate interfaces to surrounding land uses » provide for a flexible structure and block pattern that is adaptable over time in response 		<p>An Activity Centre Framework Plan should, where appropriate, provide more detail on the structure of the activity centre and identify key design objectives in accordance with the PSP vision.</p>	<p>UDIA Victoria submits that an Activity Centre Framework Plan Practitioners Note should be developed. Our members have reported a range of concerns with some PSP activity centre plans being too detailed and resembling permit level detail. Especially where the centre is in a single ownership, there should be flexibility for any Framework plan to be amended to the satisfaction of the responsible authority to provide suitable design flexibility to meet emerging retail markets and reflect changes to the retail investment environment.</p>



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
	<p>to changing economic, climate and social conditions</p> <p>» maximise opportunity for employment, health, community uses, not-for-profit uses, employment-finding and education services, adaptable/multifunctional spaces and housing in the short and long term.</p>			
	<p>F 16.3 Mechanisms to support early activation of the activity centre should be explored and encouraged.</p>		<p>An Activity Centre Framework Plan should provide flexibility to allow staging of development that would support early and continuous activation of the centre. Place-based guidelines should encourage the establishment of temporary spaces that support residents to live locally</p>	<p>A framework plan would not normally include any staging details. Instead guidelines for permit applications can address this issue of early activation. Those guidelines will normally be generic and can therefore sit in the planning scheme to apply to all centres.</p>
<p>F.17 Staging and location of development</p>		<p>T18 Identify all basic and essential infrastructure with spatial requirements on the Future Place-based Structure Plan (e.g. open space, schools, community centres, integrated water management, etc.).</p>	<p>A Precinct Infrastructure Table and Land Budget should identify land areas on a property-by-property basis.</p> <p>OPPORTUNITY In some instances, the exact location of infrastructure may be flexible (i.e. where land is consolidated into single ownership). The PSP should identify the parameters of this flexibility (refer to sidebar example). Leadership</p>	<p>Agree. Retain flexibility to vary the framework plan, especially where it is in single ownership.</p>



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
			(through forward strategic planning, partnerships, leveraging catalyst opportunities, etc.) to deliver and plan for other infrastructure and services (i.e. other than basic and essential infrastructure and services, sustainable energy or waste options, etc.) may be supported through the Innovation Pathway.	
	<p>F 17.1 The structure and design of a PSP should accommodate the coordinated delivery of key infrastructure (basic and essential infrastructure and other infrastructure) and staging of development to provide for:</p> <ul style="list-style-type: none"> » integration and shared-use opportunities » timely delivery, taking into consideration likely sequencing of development, land ownership constraints and funding sources » efficient delivery, taking into consideration likely sequencing of development » development that will not be isolated from basic and essential infrastructure and services » ensuring that development 		<p>Active engagement with government departments, service providers and utility agencies to input their forward plans and to explore strategic partnerships for planning, funding and delivery. A Precinct Infrastructure Plan should identify all infrastructure needed to service the new neighbourhoods, indicative timing, delivery responsibility, potential funding sources (such as infrastructure contributions, opportunities for Growth Areas Infrastructure Contribution (GAIC) funding and other potential funding sources) and any agreed commitments to partnerships or alternative delivery models.</p> <p>SEE ALSO PRACTITIONER'S TOOLBOX: INFRASTRUCTURE CONTRIBUTIONS GUIDELINES</p>	Agree.



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
	<p>does not take place unless it can be serviced in a timely manner » ensuring that development within a PSP can be staged to match the attainment of infrastructure triggers and the provision of infrastructure and services</p> <p>» opportunities for alternative delivery models that achieve sustainability or other community benefits</p>			
	<p>F 17.2 The staging of development within PSPs should consider: » proximity to existing or proposed development fronts or serviced land » proximity to significant public transport infrastructure or public transport service » proximity to existing or committed community infrastructure such as schools » proximity to new or existing arterial or connector road infrastructure » its role in facilitating delivery of this infrastructure.</p>		<p>Active engagement with government departments, service providers, utility providers, landowners, developers and local government to explore the potential staging of development that aligns with potential planning, funding and delivery of infrastructure. Spatial arrangement of land uses within a PSP and the provision of infrastructure within a Precinct Infrastructure Plan are aligned to encourage appropriate staging of development. Direction is provided on the location and timing of development fronts within a PSP and the trigger points for required infrastructure where relevant, in order to ensure development</p>	<p>Agree. These guidelines are generic and can sit within the planning scheme and apply more generally to development within PSP areas.</p>



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
			<p>matches the timely provision of infrastructure.</p> <p>SEE ALSO PRACTITIONER'S TOOLBOX: COORDINATED DELIVERY OF INFRASTRUCTURE AND STAGING PROVISIONS</p>	
	<p>F 17.3 Land should be set aside and reserved to allow for all public land uses, including schools, community centres, health, emergency and justice facilities, road widening and grade separation of rail from all transport corridors (includes roads, pedestrian and bicycle paths) where a delivery agency has agreed to the commitment.</p>		<p>Land required in the future should be identified in a Public Land Plan.</p>	<p>Agree. The identified land should be reserved through PAOs and compensation available when urban development occurs. In addition, the PSP should identify land that can be acquired under s36 of the subdivision Act where that land is known to be required to catalyse major development.</p>
	<p>F 17.4 Structure and design of a PSP should seek to maximise opportunities for development to utilise existing infrastructure or to capitalise on planned infrastructure commitments.</p>		<p>Infrastructure and Servicing technical report should be prepared in Stage 4: Plan Preparation and should identify existing capacity of infrastructure. Consultation should be undertaken with agencies and servicing authorities to identify opportunities to leverage planned infrastructure commitments.</p>	<p>Agree.</p>
	<p>F 17.5 Potential for shared services and precinct-wide alternative waste and recycling</p>		<p>A Precinct Infrastructure Plan should identify the proposed approach to waste management including</p>	<p>Support in principal. The relevant Council would need to in agreement, could be delivered</p>



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
	<p>management solutions should be assessed and incorporated where feasible.</p> <p>SEE EXAMPLE ALTERNATIVE WASTE COLLECTION</p>		<p>responsibility and funding arrangements if appropriate (for example, where an alternative approach to standard waste collection has been committed to by relevant stakeholders).</p> <p>Innovation Opportunity</p>	<p>through an innovation project.</p>
	<p>F 17.6 Gas trunk pipeline infrastructure should be:</p> <ul style="list-style-type: none"> » protected from encroachment by inappropriate land uses where possible. » capable of continuing its operation at minimal risk to human health, other critical infrastructure and the environment. 		<p>Consultation should be undertaken with the gas pipeline operator to explore options for safe, efficient and effective ways of treating the gas pipeline in an urban context. A Future Place-based Plan should show only appropriate land uses within gas pipeline measurement length.</p>	<p>Agree.</p>
<p>F.18 Innovative and sustainable infrastructure delivery</p>	<p>F 18.1 Alternative and innovative infrastructure and service delivery approaches should be explored early in the PSP place-shaping and visioning stages to ensure new and innovative initiatives are embedded in the design and structure of a PSP. Implications for urban form, housing, jobs and other features of the 20-minute neighbourhood should</p>		<p>The PSP Vision Statement (Stage 3) should identify any proposed infrastructure or service delivery innovations, as well as actions to support the vision.</p> <p>SEE EXAMPLE ALTERNATIVE ENERGY PROVISION</p> <p>Innovation Opportunity</p>	<p>Agree.</p>



Objective	Principle	Performance Target	How to Test Target	UDIA Victoria Submission
	be considered and addressed through the PSP.			
	F 18.2 Potential mechanisms to incentivise the early delivery of key infrastructure should be explored, particularly where the delivery of infrastructure is required to support new job growth.		<p>Active engagement with key implementing stakeholders should identify opportunities and commitment to bring forward infrastructure. All commitments should be identified in the Precinct Infrastructure Plan.</p> <p>SEE ALSO PERFORMANCE TARGET T16</p>	<p>Agree. A suitable way would be to identify high priority ICP and GAIC WIK projects to give more direction and confidence to major development proponents where these proposals are likely to be supported.</p>