

9.3 Submission for Plan Victoria

Author: Senior Strategic Projects Planner

Directorate: Strategy & Planning

Officer's Recommendation

That Council resolves to endorse the submission 'Moonee Valley City Council Public Consultation Submission for Developing a new plan for Victoria, August 2024' (Attachment 1).

Minute No. CM 2024/126

Council Resolution

Moved Cr Sharpe, seconded Cr Hodgson that Council resolves to endorse the submission 'Moonee Valley City Council Public Consultation Submission for Developing a new plan for Victoria, August 2024' (Attachment 1) with:

a. The following additions to the recommendations and renumber as required:

Housing Targets

1. Housing targets must acknowledge municipalities that are land locked with no available space to cater for the increased demand for sporting precincts, schools, kindergartens, libraries and community facilities generally, which an increase in population expects.
2. Housing targets must protect residential areas from high density development.
3. Housing targets must protect existing neighbourhood character.
4. Housing targets must acknowledge the demand for public transport and road infrastructure, and plan for investment in these assets as populations are expected to increase.

Affordable Housing

- Strategic support for planning controls that respect existing Design and Development Overlays which protect residential amenity, particularly in heritage areas

b. The following amendments to:

Equity and Jobs point 12 to read

'Plan for 100% accessible public transport stops along trams routes, after proper consultation is conducted about parking and/or impediments to traffic flow.'

Thriving point 16 by adding the following sentence:

Noting Councils with land constraints would need extensive financial support to build new sporting facilities, libraries and other community facilities.

For: Crs Adams, Bettio, Byrne, Hodgson, Iser, O'Neil, Sharpe, Sipek and Tyson
Against: Nil

CARRIED UNANIMOUSLY

Moonee Valley City Council

Submission to Plan for Victoria

August 2024



Acknowledgement of Country

We recognise the Wurundjeri Woi-wurrung people as the Traditional Custodians of the land now known as the City of Moonee Valley. Moonee Valley City Council have committed to supporting and advancing Aboriginal self-determination.

We commend the fifth pillar of **Self-determination and Caring for Country**, and the Victorian Government's commitment to genuinely partnering and meaningfully engaging with Traditional Owners and First Peoples Communities to enable greater Self-determination, reflect Treaty, and to better protect Country.

Contents

Acknowledgement of Country	2
Recommendations	4
Introduction	6
Draft housing target.....	7
Principles for the housing targets	7
Affordable housing and choice	11
Social and affordable housing	11
Well-located housing and living locally	12
Housing diversity	12
Equity and jobs	14
Protection of existing commercial and industrial land.....	14
Active transport networks	14
Public transport improvements.....	15
Thriving and liveable suburbs and towns	18
Activity centres	18
Urban design	18
Community infrastructure and service delivery.....	19
Sustainable environments and climate action	20
Canopy Cover and Urban Heat Island	20
Open Green Spaces.....	21
Waterways	21
Improved flood and stormwater management	22
Mandatory Environmentally Sustainable Design (ESD) standards.....	22

Recommendations

Housing Targets

1. Housing targets must be achievable and implemented equitably across Victoria, with due consideration of capacity of existing and the provision of new social and physical infrastructure provision.
2. Housing targets must be accompanied by Victorian Government commitments ensuring quality design standards and maintaining the valued characteristics of our neighbourhoods.
3. Measuring councils' performance on housing targets must be limited to factors within Council control.
4. Council data must be used to inform the final housing targets regarding overlay 'discounts', restrictive covenants, and factors not mapped by the planning scheme.
5. Moonee Valley City Council must remain the responsible authority for planning permit decisions in our city.

Affordable Housing and Choice

6. A state-wide target for a defined proportion of all dwellings to be social and affordable housing.
7. Mandatory planning controls in the Victorian Planning Provisions to deliver social and affordable housing at scale.
8. Expedite the delivery of social and affordable housing on surplus government land.
9. Strategic direction on activity centres and density thresholds required to support the delivery of thriving mixed use neighbourhoods.
10. Strategic support for planning controls that explicitly require the provision of diverse housing types and a review of the car parking requirements for dwellings.

Equity and jobs

11. Deliver Keilor East train station and plan for feeder bus services.
12. Plan for 100% accessible public transport stops along tram routes so that public transport can be accessed by all.
13. Implement Victoria's Bus Plan and deliver bus reform to Melbourne's north-western suburbs.

Thriving and liveable suburbs and towns

14. Provide guidance as to the quantity of new employment floorspace required to support jobs associated with forecast population growth.

15. Expand the Urban Design Guidelines for Victoria while also embedding them in the Victoria Planning Provisions.
16. The Victorian Government needs to provide councils with appropriate funding and review its application of rate capping so that community infrastructure keeps pace with population growth.

Sustainable environments and climate action

17. The new plan for Victoria must provide strong strategic basis for the introduction of controls that levy a public open space contribution on developments that contain dwellings which are not subdivided, including 'Build-to-rent' developments.
18. The new plan for Victoria must provide strong strategic support for the introduction of controls which limit the overshadowing of new and existing public open space from increased development.
19. Strategic policy support for the increased provision of canopy trees in new medium density residential developments.
20. Strategic policy support for public open space to be increased at appropriate rates.
21. Permanent and widespread application of existing or new environmental, landscape and built form overlays to Moonee Valley's waterways.
22. Melbourne Water and the Victorian Government to become leaders in floodplain management and updating flood and overland flow studies.
23. Elevate ESD standards for new developments in line with the planning scheme amendment submitted by Moonee Valley and the other participating CASBE councils.

Introduction

Moonee Valley City Council welcomes the opportunity to provide input into the development of a new plan for Victoria.

This submission begins with a response to the draft housing target for Moonee Valley, and is then framed around the four pillars provided by the Department of Transport and Planning (DTP):

- Affordable housing and choice
- Equity and jobs
- Thriving and liveable suburbs and towns
- Sustainable environments and climate action.

Council is eager to work collaboratively to maintain Victoria's status as the best place to live, work and play in Australia and to maintain the special characteristics of Moonee Valley that our community values and loves.

Draft housing target

Moonee Valley housing target: 57,000 dwellings

Housing target:	2,200 dwellings per year
Current rate of construction (2016-2021):	900 dwellings per year
Demand for housing based on population forecasts:	900 dwellings per year

Principles for the housing targets

The targets must be equitable

Any application of housing targets must be commensurate with each council area's capacity to accommodate growth, supported by provision of new and upgraded social and physical infrastructure.

The targets must be backed by adequate funding and infrastructure

The projected increase in housing will significantly impact on council and state social infrastructure, including schools, kindergartens, libraries, childcare facilities, healthcare centres, sports facilities, and other community services. In a rate-capped environment, Council cannot sufficiently expand these facilities to meet a potential doubling of the population over the next 25 years. It is crucial that the Victorian Government review its application of rate capping and allocates adequate funding and provides appropriate funding mechanisms to maintain and expand the community facilities needed.

The targets must be achievable

The role of local government, currently, is not to directly deliver new housing, nor is Council able to countervail broader economic obstacles to development such as labour shortages and rising costs of building materials. The Victorian Government should also consider the impact of policies such as windfall gain tax on viability of development and housing growth and its potential to help fund social and affordable housing.

Moonee Valley City Council strongly opposes any potential penalties for failing to achieve housing construction in line with state-mandated housing targets.

The targets should not undermine the character of our neighbourhoods

The character and heritage of Moonee Valley is highly valued by our community. Any planning reforms to deliver housing at higher densities should be mindful of this. The final housing targets should account for these constraints where practical. Moreover, the Victorian Government should seek to bring the community along with this change, rather than impose growth without education around why infill development is required

Moonee Valley must remain the responsible authority for planning permit decisions in our city

Council is best placed to assess planning applications, and is cognisant of the needs of its community. Council also has all the in-house expertise and experience to determine an

application, including urban planners, arborists, traffic and drainage engineers, environmental sustainability officers and others.

Council strongly opposes any reform that would undermine the position of Council as the Responsible Authority for planning permit decisions.

Issues with the housing target modelling and process

The opportunity should be afforded to councils to provide information on known constraints in the municipality.

Planning overlays

The Department of Transport and Planning (DTP) has applied some discounted assumptions to certain overlays that do not accurately reflect how these overlays impact on density in Moonee Valley.

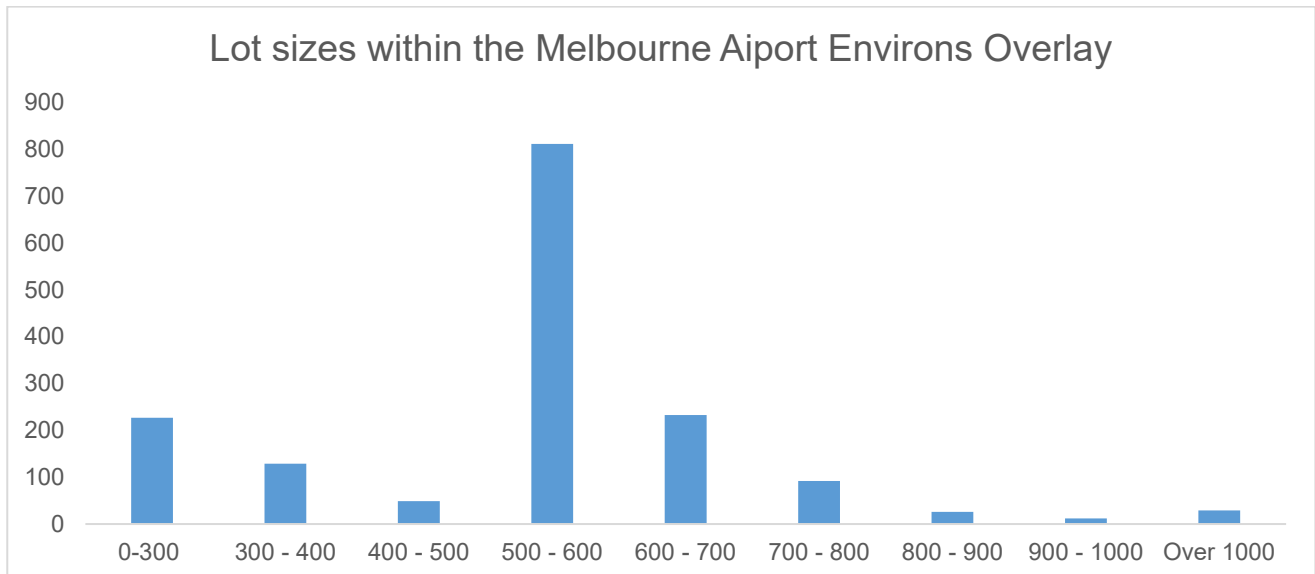
Land Subject to Inundation Overlay (LSIO) – 50% Discount

Melbourne Water is currently proposing a new LSIO for the municipality, supported by modelling that reflects climate change and flood levels in a 2100 scenario. The new LSIO would see additional properties impacted by riverine flooding under this new modelling. The discount provided in the draft housing targets reflects the existing LSIO and not the additional properties which will be impacted by the proposed LSIO. The proposed LSIO, should be used in the model to ensure a more accurate housing target.

An increased density in areas with an LSIO is counter to the purpose of the overlay. Areas subject to riverine flooding should be within the undevelopable category in the model, as opposed to the current 50% discount on capacity proposed.

Melbourne Airport Environs Overlay (MAEO) – 20% Discount

The 20% discount proposed in the DTP model is not reflective of development trends within Moonee Valley. Council data shows that the most frequent lot size within the MAEO is between 500 – and 600 square metres in area. The density limit with the MAEO is one dwelling per 300 square metres. Therefore, none of these lots can be subdivided and this land should be within the undevelopable category in the model.



Heritage Overlay (HO) – 50% Discount

The HO operates significantly differently in an activity centre or commercial area compared to a residential context, and this discount should be reflected in DTPs model. In a commercial context, where it is common to retain the façade and construct apartments at the upper levels, the discount is potentially less than 50%. In a residential context, compliance with the Heritage Overlay commonly requires the retention of the façade of the heritage dwelling with any additions usually setback from the front wall by at least the two rooms. As this common design approach prevents both a duplex or tandem layout being feasible on most lots, properties within this overlay should be within the undevelopable category in the model.

Restrictive Covenants

Restrictive covenants limiting the development of properties to only a single dwelling are common across metropolitan Melbourne and were an early form of town planning control. There are over a thousand properties within Moonee Valley containing single dwelling restrictive covenants, some of which are grouped in larger estates. These restrictions will significantly impact the opportunity to increase density within the municipality and across metropolitan Melbourne and must be factored into the projected housing targets. Moreover, it is inequitable that properties that do not have a restrictive covenant are required to accommodate additional growth, while covenanted properties and areas will not as they are protected somewhat under Victorian planning law.

Council can provide the relevant data to the Plan for Victoria team on request.

Flight paths

Moonee Valley is impacted by both the Melbourne and Essendon airports, and this impact goes beyond the overlays within the planning scheme.

The proposed third runway at Melbourne Airport will result in an expansion of the MAEO, and impact on the flight paths at Essendon Airport, potentially triggering the introduction of an AEO for Essendon Airport. The impact of this must be factored into both the housing targets and the anticipated increase in density in the Keilor Road and North Essendon Activity Centres.

Buffers and environmental hazards

There are buffer areas within Moonee Valley that impact residential development within a certain radius from the Exxon Mobil jetfuel pipeline, Australian Pipelines and Gas Association (APGA) gas pipeline and the SPAusnet 220kV transmission line.

These buffer areas are not covered by overlays, but nonetheless trigger statutory planning referrals to the relevant authorities, often impact on development outcomes and need to be considered in the finalisation of the housing targets. Council can provide the relevant mapping to DTP on request.

Allowing space for non-residential uses

As the number of dwellings in Moonee Valley increases, so will demand for open space, jobs and facilities. Alongside the housing modelling, DTP should provide municipalities with the ability to model demand for non-residential uses, so that any rezoning to meet housing targets is done in tandem with ensuring space for non-residential uses.

Recommendations

1. Housing targets must be achievable and implemented equitably across Victoria, with due consideration of capacity of existing and the provision of new social and physical infrastructure provision.
2. Housing targets must be accompanied by Victorian Government commitments ensuring quality design standards and maintaining the valued characteristics of our neighbourhoods.
3. Measuring councils' performance on housing targets must be limited to factors within council control.
4. Council data must be used to inform the final housing targets regarding overlay 'discounts', restrictive covenants, and factors not mapped by the planning scheme.
5. Moonee Valley City Council must remain the responsible authority for planning permit decisions in our city.

Affordable housing and choice

Social and affordable housing

As part of our vision for Moonee Valley to be a ‘fair’ city, MV2040 set a strategic direction of ‘a city with housing for all’. Access to social and affordable housing is central to achieving this vision for Moonee Valley. It is an ongoing concern for our communities, with data from the 2021 Census showing that housing stress is affecting 24.8 per cent of renters and 7.6 per cent of owners. Victoria has the lowest proportion of social housing in Australia¹, placing upward pressure on housing affordability in the state. The Community Advisory Panel on Housing convened by Council as an input to the upcoming Moonee Valley Housing Strategy recently handed down its findings, including a recommendation for Council to “engage with relevant bodies to encourage the development of diverse models of AFFORDABLE (sic) options for housing for all”.

The new *Plan for Victoria* should set a target for a defined proportion of dwellings to be social and affordable housing and articulate a plan for how this can be achieved, including sustainable funding. This should include higher commitments for the uplift in the number of social housing dwellings in the redevelopment of public housing, and delivery of new social housing on surplus government land (as outlined in the recently announced Small Sites Pilot), such as at 18 Russell Street, Essendon, which abuts Essendon Train Station.

Existing arrangements for voluntary affordable housing provide limited avenues through which Council can incentivise private developers to include affordable housing in their developments.



Figure 2: 18 Russell Street, Essendon

Strong affordable housing requirements written into the Victoria Planning Provisions would provide both the certainty for developers by allowing them to factor such costs at the time of purchasing a developable property and help to address the shortfall in housing accessible to low to moderate-income households.

The development of a new plan for Victoria presents an opportunity for the Victorian Government to consider how levies such as the windfall gains tax might best be utilised to facilitate the development of more social and affordable housing on well-located sites.

¹ <https://chp.org.au/article/new-figures-reveal-victorias-social-housing-crisis/>
Moonee Valley Submission to Plan for Victoria

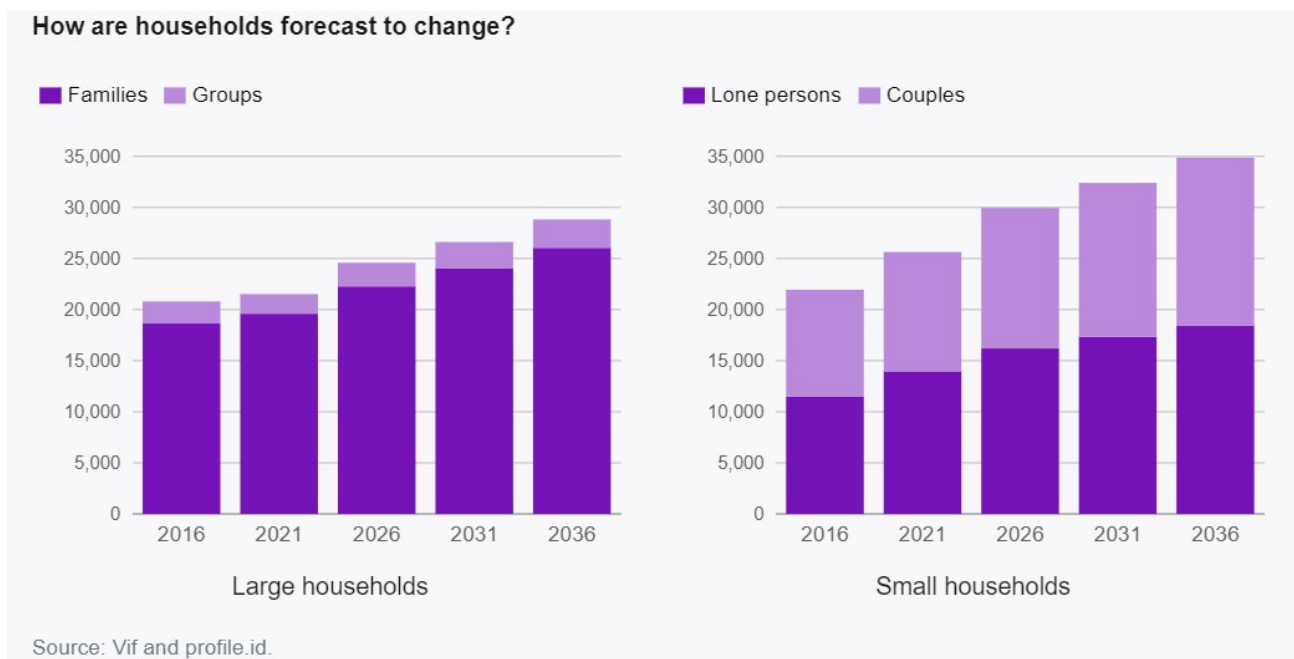
Well-located housing and living locally

Moonee Valley's community vision is a 'healthy city' where our neighbourhoods allow all people, at all stages of life, to live locally, accessing most of their needs close to their home. Council supports the continuation of the principles in *Plan Melbourne* around 'living locally' to ensure alignment between the preparation of Council's housing and activity centre work programs and state policy.

Council submits that to best achieve the principle of 'living locally' in Moonee Valley, a new plan for Victoria should consider the required housing density thresholds to support thriving mixed-use neighbourhoods. Leadership on this issue from state and local governments will reassure the community that while change will result from increased housing density, it will be carefully balanced with maintaining what we love about our locality for future generations.

Housing diversity

Housing needs are changing in Moonee Valley. There has been a substantial increase in single-person households, and an increasing preference for high density living. There is a growing demand for diverse housing options, underscoring the need for planning strategies that accommodate various household types in Moonee Valley.



Planning controls that explicitly require the provision of diverse housing are essential, as well as the integration of accessible housing standards into the Victoria Planning Provisions. Innovative residential development models and cohousing developments should be supported by the planning system with incentives and clear pathways for approval.

Similarly, mandatory minimum car parking requirements are also a barrier to diversifying housing provision according to need. Alternative provisions such as car share

arrangements within developments that are managed by an owners corporation or car parking maximums in areas well served by high quality public transport, could ensure more dwellings are built and that car parking requirements do not impose unnecessary costs on home buyers/occupiers who choose not to own a car.

Recommendations

6. A state-wide target for a defined proportion of all dwellings to be social and affordable housing.
7. Mandatory planning controls in the Victorian Planning Provisions to deliver social and affordable housing at scale.
8. Expedite the delivery of social and affordable housing on surplus government land.
9. Strategic direction on activity centres and density thresholds required to support the delivery of thriving mixed use neighbourhoods.
10. Strategic support for planning controls that explicitly require the provision of diverse housing types and a review of the car parking requirements for dwellings.

Equity and jobs

Protection of existing commercial and industrial land

Previous Victorian Government policy, namely the Melbourne Industrial and Commercial Land Use Plan (MICLUP), directs councils to protect employment and industrial land uses. This is crucial as MICLUP projects 151,000 new jobs in Melbourne's Western Region by 2031 and anticipates a need for 267,000 square metres of commercial space in Moonee Valley. Sufficient employment land must be preserved to accommodate the jobs required for a growing population.

In Moonee Valley, MICLUP identifies two key areas: the Commercial 2 zone near Matthews Avenue in Airport West, and land near the proposed new train station at Keilor East, zoned Industrial 3.

The new plan for Victoria should facilitate the prioritisation of employment land as housing and population pressures increase due to housing targets and provide policy guidance on managing competing strategic priorities.

Active transport networks

MV2040 sets out a vision for Moonee Valley as a city where sustainable transport is the easy option, with a target of more than half our residents travelling to work by walking, cycling or public transport by the year 2040. Council regards sustainable transport as an integral component of realising the ambition of living locally and supporting increased density across Moonee Valley.

The roads that will provide the important links for cyclists are largely roads which are owned and managed by the Victorian Government. While Council will continue to provide its support, state leadership is required to deliver these projects.

Many of the roads in the strategic cycling corridor in Moonee Valley do not provide separated, stress-free bike lanes, this needs to be provided to reduce the impacts of densification on our roads.

The preparation of a new plan for Victoria is a timely opportunity for the Victorian Government to clarify the role of the arterial road network and Council's role in planning and delivering active transport infrastructure in Moonee Valley.

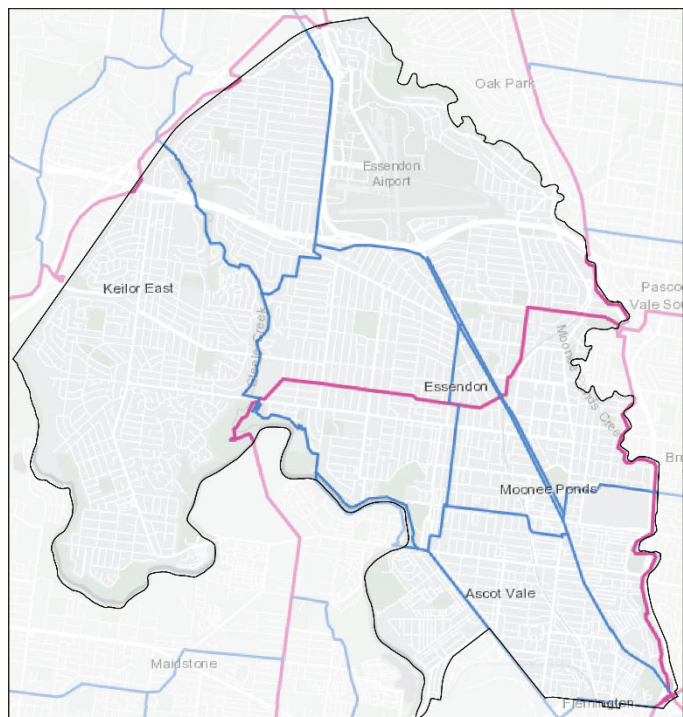


Figure 3: Strategic Cycling Corridor

It is Council's view that a new plan for Victoria should:

- Increase access to safe active transport infrastructure for pedestrians and cyclists, particularly along arterial roads, and improving the connectivity of this network across Moonee Valley.
- Improve integration of active transport infrastructure with public transport infrastructure, both existing and planned, to support improved local transport choices and better integration with Melbourne's wider road and public transport network.

Public transport improvements

Public transportation infrastructure is a vital component in realising the aspiration of thriving and liveable suburbs and towns. The western half of Moonee Valley is underserved by public transport. These areas will experience housing growth without access to a fixed rail network, while the bus network is currently poorly configured and infrequent.

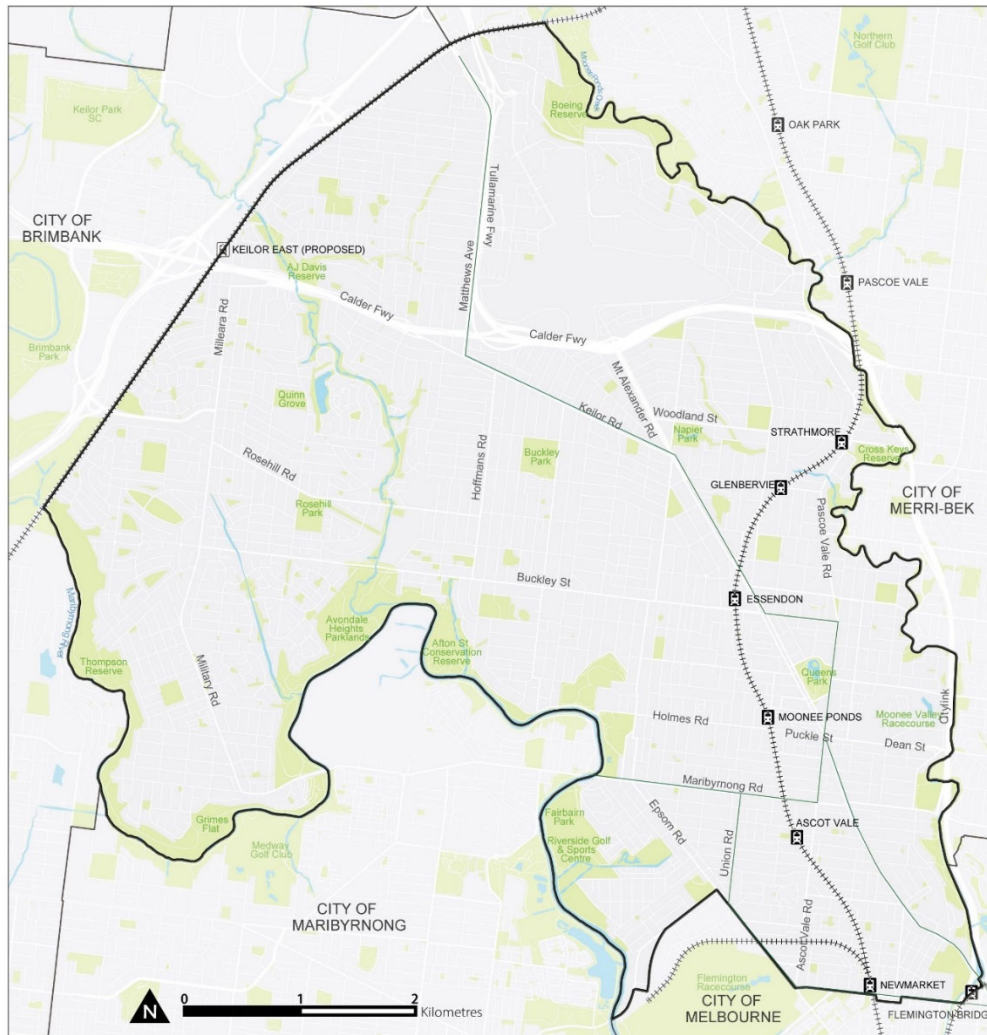


Figure 4: Rail and tram line map of Moonee Valley, showing the lack of service in the western portion of the municipality.

Council also submits that it is time for Melbourne Airport Rail and the Keilor East train station to be built without any further delay.

The implementation of *Victoria's Bus Plan* and the delivery of bus reform to Melbourne's north-western suburbs is long overdue. There also needs to be a planned integration of feeder bus services within the planned Keilor East station precinct to maximise connectivity with the broader region.

There is little incentive for housing growth in under-served neighbourhood activity centres without improving public transport infrastructure along the Millearra Road/Military Road transport corridor.

The extension of the tram network (or other high-quality public transport modes) into Avondale Heights and Keilor East along Military Road and Millearra Road would provide

appropriate transport infrastructure to support the anticipated housing growth and our existing and future community in these areas.

Additionally, accessible public transport stops along tram and bus routes in Moonee Valley are required so that public transport can be accessed by all.

Recommendations

11. Deliver Keilor East train station and plan for feeder bus services.
12. Plan for 100 per cent accessible public transport stops along tram routes so that public transport can be accessed by all.
13. Implement *Victoria's Bus Plan* and deliver bus reform to Melbourne's north-western suburbs.

Thriving and liveable suburbs and towns

Activity centres

Moonee Valley is home to six major activity centres identified in *Plan Melbourne*:

- Moonee Ponds
- Flemington-Racecourse Road
- Ascot Vale-Union Road
- Essendon North
- Niddrie-Keilor Road
- Airport West.

The identification of new employment land to support population growth into the future is essential to the successful implementation of ‘living locally’. As Melbourne’s population grows, so too will the demand for services and amenities close to where people live.

This work should be conducted in partnership with local government, particularly with regards to larger neighbourhood activity centres that may have potential to grow into higher order activity centres. Council is preparing an Activity Centres Framework to establish an activity centre hierarchy and guide development within these centres.

As such, it is imperative that state and local strategic planning priorities are aligned with regards to these activity centres. Clear direction from the new Plan for Victoria is vital regarding the amount of commercial floor space required to support housing growth and to enable communities to live locally.

Urban design

MV2040 sets an aspiration for Moonee Valley as a city of high-quality design. Good design is vital to ensure that new development contributes positively to the look and feel of our neighbourhoods and is supported by the community.

Council support development that incorporates innovative application of materials, construction techniques, environmentally sustainable design and building configurations and pride ourselves on providing clear and effective permit conditions.

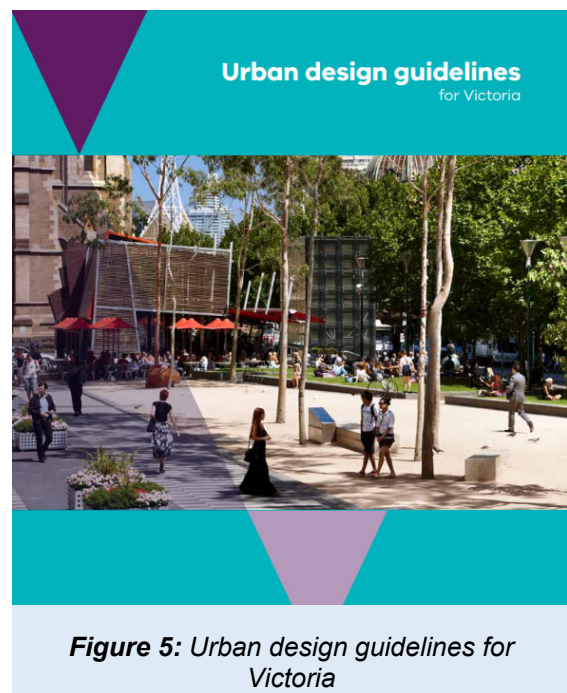


Figure 5: Urban design guidelines for Victoria

There is opportunity to enhance the *Urban Design Guidelines for Victoria* and more closely integrate them into the Victoria Planning Provisions. The development of a new plan for Victoria should consider how this might best be achieved to assist in consistently delivering desirable urban design outcomes across the state.

Community infrastructure and service delivery

The projected housing growth under the housing targets will have a significant impact on the usage of council and state government infrastructure. Existing schools, libraries, maternal healthcare centres, sporting facilities, community hubs, youth services and other forms of community infrastructure are vital to supporting the Moonee Valley community. Population pressures are already being felt with the issue highlighted in recent community surveys in Moonee Valley.

In a rate-capped environment, councils are unable to scale up the capacity of these facilities to accommodate a near doubling of the population in 25 years. The Victorian Government must both review its application of rate capping and provide appropriate funding to ensure that the development of and access to community facilities is maintained, so Council can expand existing facilities or open new facilities where necessary.



Figure 6: Djerring Hub, Flemington

Recommendations

14. Provide guidance as to the quantity of new employment floorspace required to support jobs associated with forecast population growth.
15. Expand the *Urban Design Guidelines for Victoria* while also embedding them in the Victoria Planning Provisions.
16. The Victorian Government needs to provide councils with appropriate funding and review its application of rate capping so that community infrastructure keeps pace with population growth.

Sustainable environments and climate action

Canopy Cover and Urban Heat Island

Council's long-term *MV2040 Strategy* sets a strategic direction for Moonee Valley as a green city that is ecologically healthy and environmentally responsible. Council has committed to a municipal tree canopy target of 30 per cent by 2040 and has endorsed the *MV2040 Action Plan – Green* to address tree canopy objectives laid out in MV2040.

The Urban Heat Island (UHI) impact in Moonee Valley is significant; being nearly 10 degrees hotter in summer and the 4th worst affected urban area in Greater Melbourne.²

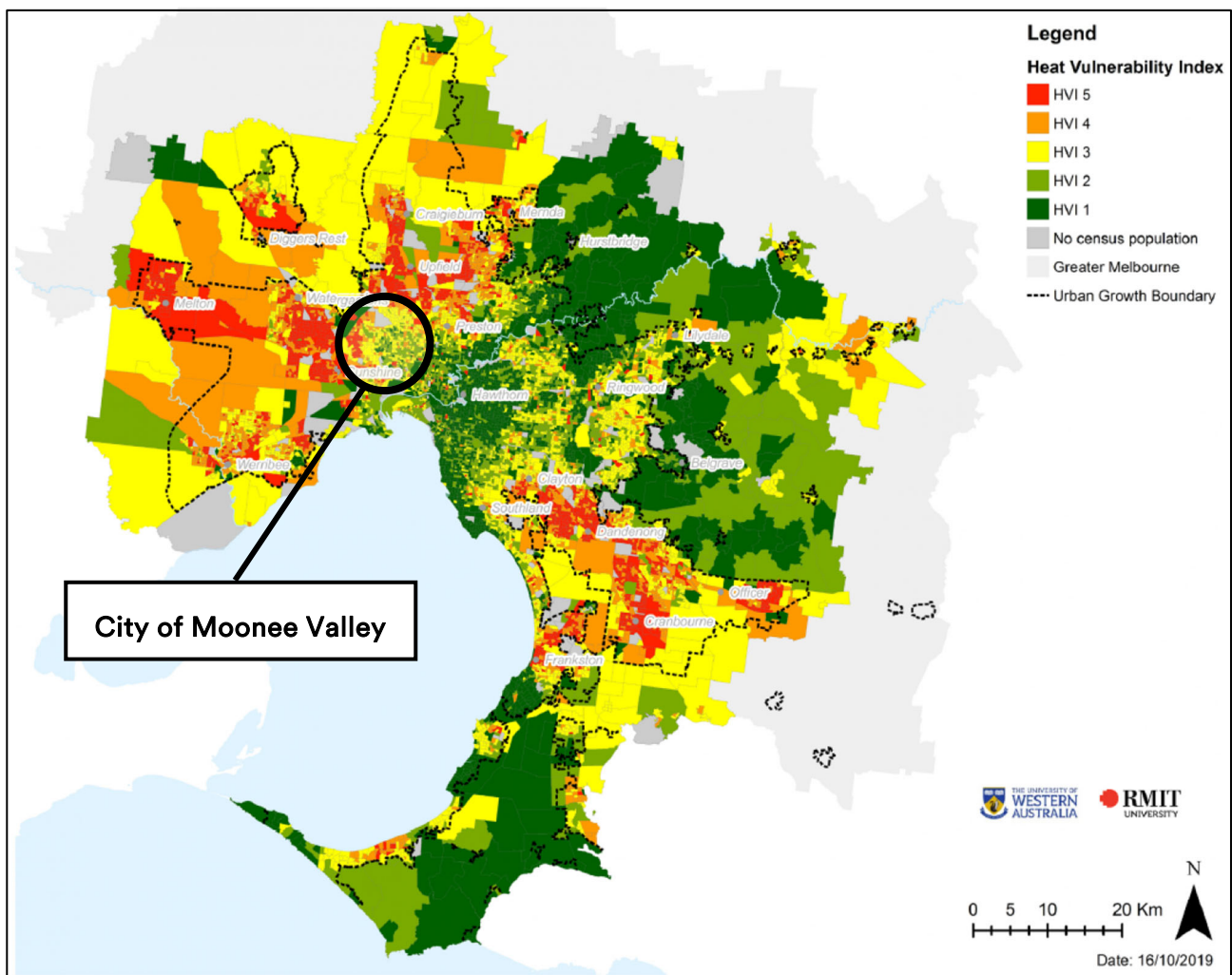


Figure 7: Heat Vulnerability Index, Metropolitan Melbourne

Tree planting in the public realm alone is not enough to achieve our target. Increased tree canopy on private land is required. A new plan for Victoria must emphasise urban greening and increased landscaping as a planning requirement for infill residential development.

² <https://www.planning.vic.gov.au/guides-and-resources/data-and-insights/melbournes-vegetation-heat-and-land-use-data>

Open Green Spaces

As a municipality composed of established suburbs, adequate provision of public open space in Moonee Valley is a complex task. As the population grows and housing density increases, ensuring adequate provision of open space is a vital consideration in



Figure 8: Pocket Park, Ascot Vale

maintaining Melbourne's status as Australia's most liveable city. This open space is essential for supporting urban biodiversity and mitigating the urban heat island effect, as well as amenity and active and passive recreational uses.

Council is committed through its recently completed *Open Space Strategy 2024* to address gaps in open space provision by adding new open space in areas that have been identified as possessing a deficit in relation to their population. This is not unique to Moonee Valley.

The current process of each council individually applying for an increase to the standard public open space contribution is time-consuming and costly, when the default of 5 per cent is no longer fit for purpose. The mechanism of applying the contribution at subdivision phase is also flawed, given that build-to-rent models circumvent this contribution despite generating demand for public open space.

The development of a new plan for Victoria should provide strategic direction that facilitates Council to ensure public open space provision can be increased at appropriate levels to cater for the needs of the future community.

Waterways

Moonee Valley is home to several waterways, including Maribyrnong River, Moonee Ponds Creek, Steele Creek, and the Five Mile Creek. These waterways and associated riparian corridors make a key contribution to the biodiversity and landscape character of Moonee Valley. A new plan for Victoria should provide a path for the naturalisation of more waterways following the Moonee Ponds Creek project.



Figure 9: Moonee Ponds Creek

While the Maribyrnong River and Moonee Ponds Creek enjoy some degree of protection through the application of a Design and Development Overlay over the Maribyrnong River

environs, an Environment Significance Overlay in some areas, and the interim application of the Significant Landscape Overlay, Council submits that more robust planning controls should be universally applied to safeguard both these areas and other important waterways such as Steele Creek and Five Mile Creek against inappropriate development outcomes.

Specific water sensitive urban design policies should be developed specifically for the protection of urban waterways from stormwater impacts.

Improved flood and stormwater management

As a municipality featuring several urban waterways, many areas of Moonee Valley are vulnerable to risk of riverine flooding as well as overland flows. Recent modelling has shown an increased risk, expected to worsen over time because of climate change.

Although Melbourne Water is the floodplain management authority under the *Water Act 1989*, currently councils carry out individual flood studies and planning scheme amendments to update flood levels.

A state-led approach would allow councils to more efficiently update their flooding and overland flow controls in the planning scheme.

Mandatory Environmentally Sustainable Design (ESD) standards

A new plan for Victoria is an opportunity to go above National Construction Code (NCC) standards and provide clear direction in ESD policy across the state. Moonee Valley City Council submits that a new plan for Victoria should include the implementation of planning provisions mandating minimum environmentally sustainable design (ESD) standards in all new residential development. It is vital that the Council Alliance for a Sustainable Built Environment (CASBE) ESD roadmap is implemented as soon as possible to ensure that it is in place before the housing development anticipated by the housing targets commences.



Figure 10: CASBE is made up of 42 Councils, working together to elevate ESD standards.

Mandatory requirements should be introduced to ensure new development produce net zero carbon emissions. Specific measures include electrical vehicle charging infrastructure in new developments, solar panel provision based on the number of bedrooms and energy? efficient colours and materials. There should also be clear guidance on how to promote energy efficiency through siting, layout and design at the planning stage.

Recommendations

17. The new plan for Victoria must provide strong strategic basis for the introduction of controls that levy a public open space contribution on developments that contain dwellings which are not subdivided, including 'Build-to-rent' developments.
18. The new plan for Victoria must provide strong strategic support for the introduction of controls which limit the overshadowing of new and existing public open space from increased development.
19. Strategic policy support for the increased provision of canopy trees in new medium density residential developments.
20. Strategic policy support for public open space to be increased at appropriate rates.
21. Permanent and widespread application of existing or new environmental, landscape and built form overlays to Moonee Valley's waterways.
22. Melbourne Water and the Victorian Government to become leaders in floodplain management and updating flood and overland flow studies.
23. Elevate ESD standards for new developments in line with the planning scheme amendment submitted by Moonee Valley and the other participating CASBE councils.