

Feedback on specific strategy recommendations

Summary table

Recommendation	Moreland position (green – support; red – oppose, blank – N/A)	Comments submitted
1. Accelerate the uptake of zero emissions vehicles	Green	✓
2. Augment electricity transmission for renewable energy and resilience	Green	✓
3. Identify and coordinate priority Renewable Energy Zones	Blank	
4. Require 7-star energy-rated new homes in 2022, increasing towards 8 stars by 2025	Green	✓
5. Mandate a home energy rating disclosure scheme	Green	✓
6. Make Victorian Government buildings more energy efficient	Green	✓
7. Reduce peak electricity use with demand management pricing	Green	✓
8. Allow new gas-free housing estates and review current gas policies	Green	✓
9. Specify climate scenarios and carbon value in assessing infrastructure	Green	
10. Strategically review climate consequences for infrastructure	Green	✓
11. Consider all water supply sources	Green	✓
12. Progress integrated water cycle management	Green	✓
13. Improve decision-making for urban water investment	Green	✓
14. Strengthen agricultural water security by modernising irrigation	Blank	
15. Upgrade Victoria's emergency water network	Blank	
16. Invest in protecting Victoria's coasts	Blank	
17. Prepare for increasingly automated vehicle fleets	Green	✓
18. Facilitate integration of public transport with new mobility services	Green	✓
19. Incorporate personal mobility devices in regulation	Green	✓
20. Transform road network operations for all current and future modes	Blank	
21. Use innovation to deliver better models of health care	Blank	
22. Modernise courts through digitisation and contemporary shared facilities	Blank	
23. Improve technology and infrastructure for a responsive police service	Blank	
24. Optimise capacity at the Port of Melbourne	Blank	
25. Act now to protect the future Bay West Port option	Blank	
26. Purchase land for Melbourne's future freight terminals	Blank	
27. Construct an outer metropolitan road and rail corridor	Green	
28. Facilitate improved recycling infrastructure for priority materials	Green	✓
29. Strengthen end markets for recycled materials	Green	✓
30. Address barriers to recycling and reducing waste	Green	✓
31. Minimise waste and improve residual waste infrastructure planning	Green	✓
32. Produce public plans for priority infrastructure sectors	Green	✓
33. Publish Victoria's transport plan	Green	✓
34. Review Victoria's infrastructure contribution system to cover gaps	Green	✓

35. Support more homes in priority established places		
36. Deliver very low income housing with inclusionary zoning		
37. Develop an interconnected open space network		
38. Partner with local governments to fund pedestrian infrastructure		✓
39. Transform cycling in Melbourne, Ballarat, Bendigo and Geelong		✓
40. Improve walking and cycling data to better estimate travel impacts and benefits		
41. Reallocate road space to priority transport modes		✓
42. Redesign tram routes		✓
43. Activate urban renewal with new tram links		
44. Plan for public transport accessibility, including tram stop upgrades		✓
45. Adopt peak and off-peak public transport fares		✓
46. Price each public transport mode differently		✓
47. Abolish the free tram zone		
48. Remove annual charges while introducing distance-based pricing for electric vehicles		✓
49. Appoint an independent transport pricing adviser		
50. Increase and extend the Melbourne Congestion Levy on parking		✓
51. Incorporate congestion pricing for all new metropolitan freeways		✓
52. Trial full-scale congestion pricing in inner Melbourne		✓
53. Trial demand-responsive pricing on parking in inner Melbourne		✓
54. Price parking at major public transport hubs, all train stations and park-and-rides		✓
55. Phase out fixed road user charges and introduce user pays charging		
56. Require accessible buildings for public services		
57. Rapidly renew old public housing		✓
58. Upgrade and rebuild public hospital infrastructure		
59. Build back better after emergencies		
60. Expand the legislated definition of critical infrastructure and improve information flows		
61. Incorporate lessons of emergency reviews		
62. Reshape the metropolitan bus network		✓
63. Connect suburban jobs through premium buses and road upgrades		
64. Increase suburban rail corridor services and capacity		✓
65. Reconfigure the city loop for cross-city train services		
66. Prepare for Melbourne Metro Two		
67. Protect a future option for a new cross-city motorway		✓
68. Prioritise and oversee infrastructure delivery in growing communities		✓
69. Expand rail access in outer suburbs		
70. Expand and upgrade Melbourne's outer suburban road network		
71. Target 30% tree canopy coverage in new growth areas		✓
72. Co-design an Aboriginal Community-Controlled Infrastructure Plan		
73. Set targets to grow social housing		✓
74. Build new hospital capacity		
75. Deliver infrastructure for a better mental health system		
76. Plan and consistently deliver corrections and youth justice infrastructure while managing demand with policy settings		

Please note that this submission only includes comments on a selection of the recommendations. Moreland has expressed support or opposition to certain recommendations (colour-coded in the table above) without providing comments.

Section 1: Confront long-term challenges

Moreland City Council's key strategies and action plans have been developed to address a number of the long-term challenges and recommendations outlined below. These key strategies of relevance include:

- Zero Carbon Moreland – Climate Emergency 2040 Framework and Action Plan 2021-2025
- Waste and Litter Strategy – 2018-2022
- Moreland Integrated Transport Strategy 2019
- Nature Plan 2020 – 2024
- Integrated Water Management Strategy 2040 and Action Plan 2020-2024
- Moreland Planning Scheme, Local Planning Policy 22.08 Environmentally Sustainable Design (ESD)

1. Accelerate the uptake of zero emissions vehicles

Moreland strongly endorses this recommendation. The sentence “Australia trails behind global leaders in adopting zero emissions vehicles” could be strengthened. Australia had the third-lowest level of electric vehicles sales of the 35 OECD member states ([ABC Fact check](#), May 2019).

This recommendation #1 seems to conflict with recommendation #48 (‘introduce distance-based charging for EVs’). Moreland has 25 EVs in its fleet and manages a network of 16 public chargers; Moreland therefore sees itself a leader in the space of zero emissions vehicles. Moreland considers that distance-based charging specifically for EVs will significantly slow down their uptake and has written to The Hon. Tim Pallas, Treasurer, to oppose the imposition of a road usage tax on electric vehicles without broader policy reform around sustainable transport and road funding.

2. Augment electricity transmission for renewable energy and resilience

Moreland strongly supports this recommendation. Despite including appropriately sized on-site solar PV and strong energy efficiency measures, Moreland has run into problems where infrastructure has been limited by maximum export loads and the need to upgrade electricity substations. Moreland has also been informed by local developers that the existing network is a barrier to all-electric buildings and solar systems greater than 99kW.

4. Require 7-star energy-rated new homes in 2022, increasing towards 8 stars by 2025

This recommendation aligns with Moreland's work in using local ESD planning policy to require new buildings to exceed NCC 5 star minimum and 6 star average ratings. In recent years, Moreland has generally required building to attain a 6.5 star NatHERS average or higher. Many of the newly built homes in City of Moreland exceed this target and are built to over 7 stars. This demonstrates that new dwellings can easily be designed and built to 7

stars by 2022 (if not earlier) and 8 stars by 2025. It also demonstrates that the development industry is able to achieve this.

5. Mandate a home energy rating disclosure scheme

Moreland has long believed that a mandatory home energy rating disclosure scheme would be an excellent method to improve energy literacy, encourage energy-efficiency improvements and increase on-site renewables.

6. Make Victorian Government buildings more energy efficient

Moreland has a long history of targeted energy-efficiency upgrades. Moreland has installed 835 kW of solar PV, carried out large-scale energy-efficiency upgrades on aquatic centres, civic centres and libraries, and upgraded 8,500 streetlights to LEDs. Moreland welcomes mandated energy-efficiency requirements and believes this will help stimulate the industry, set an example for the community, and reduce energy costs.

Moreland strongly recommends that the barriers facing schools wishing to install solar PV are significantly reduced. First, the process of seeking approval for solar is extremely arduous for schools. Second, schools do not receive the cost savings associated with installing solar PV. Solar on schools has huge potential for reducing costs and setting an example for students as well as the wider community.

7. Reduce peak electricity use with demand management pricing

Moreland is supportive of this recommendation and believes it aligns with the emergence of technologies such as electric vehicle charging, battery storage technology and micro-grid power sharing.

8. Allow new gas-free housing estates and review current gas policies

Moreland is supportive of this recommendation. It aligns with Moreland's successful history of engaging with local developers to encourage all-electric buildings, and of transitioning/removing gas from Moreland's owned and leased buildings. Moreland has developed a strong body of evidence to demonstrate that gas-free development is technologically feasible and commercially viable. Multiple gas-free housing developments have been completed in the City of Moreland, including private townhouses and apartments. Council has converted the main Council administrative site (90 Bell St) to electric heating and is currently constructing an all-electric community hub (Wheatsheaf Hub). Council has also carried out feasibility studies on making its aquatic centres gas-free.

This recommendation aligns with the Victorian Government's *Climate Change Act 2017* target of net zero greenhouse gas emissions by 2050. The sooner this recommendation is implemented, the fewer stranded assets will be created.

10. *Strategically review climate consequences for infrastructure*
11. *Consider all water supply sources*
12. *Progress integrated water cycle management*
13. *Improve decision-making for urban water investment*

Moreland strongly endorses these recommendations. Moreland has recently adopted its *Integrated Water Management Strategy 2040* and is moving toward being a water-sensitive city. Moreland is actively working across the municipality to create water supply catchments, provide ecosystem services and develop water sensitive communities.

17. *Prepare for increasingly automated vehicle fleets*

Moreland supports this recommendation. Autonomous vehicles have the potential to increase road capacity, reduce road crashes through removing human error from the road environment, and provide mobility options to people who otherwise are not able to drive.

It is important that safety for all road users is a key consideration in the development of any guidelines for the transition to automated vehicles.

One should also be mindful that preparing for autonomous vehicles should not come at the expense of road users such as pedestrians and cyclists. For example, Moreland would not endorse restricting cyclists from using certain roads or reducing opportunities for pedestrians to cross certain roads, even if that were to increase throughput of autonomous vehicles.

The benefits of autonomous vehicles relative to conventional vehicles should also not override consideration of the impacts that all motor vehicles have on sustainable transport and place objectives.

Reliably consistent road markings will be key to the successful introduction of this technology, however achieving such consistency will require significant effort.

18. *Facilitate integration of public transport with new mobility services*

Moreland supports this recommendation, particularly with regards to enhancing mobility options for people who do not drive or own a car. However, development of new mobility services must include consideration for those who do not use smartphones or computers. This includes some elderly people and people with limited literacy.

19. *Incorporate personal mobility devices in regulation*

Moreland supports this recommendation to ensure safe, regulated uptake of new personal mobility options which can improve mobility and provide alternatives to car use for some trips.

Moreland welcomes the development of a consistent regulation framework, that does not rely on ad hoc exemptions and does not require resource-intensive negotiations between operators and individual local governments.

Moreland requests that local governments be heavily involved in the development of any regulations, in order to manage potential issues such as safety and maintaining the accessibility of footpaths.

28. Facilitate improved recycling infrastructure for priority materials

Moreland endorses this recommendation and believes this needs urgent and immediate attention if the *Recycling Victoria* goal of 80% diversion of waste from landfill by 2030 is to be achieved. It is noted that Moreland has target of achieving zero waste to landfill by 2030.

29. Strengthen end markets for recycled materials

Moreland supports the recommendation requiring state government to procure products made from recycled materials. Moreland agrees that the development of a market for recycled materials needs to be accelerated immediately. To achieve this, Moreland would like to see funding for research and development be levied from industries that generate the waste.

30. Address barriers to recycling and reducing waste

Moreland supports the recommendation for greater consistency in kerbside collections. This consistency would be achieved by improving recycling infrastructure. Moreland strongly endorses the recommendation to implement a state-wide behaviour change program to reduce contamination. Moreland considers that state government is best placed to maintain and deliver such a program.

31. Minimise waste and improve residual waste infrastructure planning

Moreland strongly endorses the view that state government should prioritise investment into waste avoidance. Moreland would welcome behaviour change programs that incentivise waste avoidance, changes to legislation and clear advice/support from relevant departments. These are all necessary to increase uptake of returnable/reusable products in preference to single-use items.

Section 2: Manage urban change

32. Produce public plans for priority infrastructure sectors

Moreland agrees with Infrastructure Victoria's view that "Viewing social housing as infrastructure can create opportunities". The establishment of Homes Victoria and the development through 2021 of a *Ten Year Social and Affordable Housing Strategy* provide a unique opportunity for the state government. The state government should set goals for delivery of social and affordable housing and work with all stakeholders (e.g., state government departments and agencies, Commonwealth and local governments, community and sector stakeholders) in achieving these goals.

33. Publish Victoria's transport plan

Moreland would welcome a coordinated overarching transport plan to provide transparency and certainty on the state government's transport agenda, and to help local governments conduct their own transport planning.

This plan should identify which improvements to the public transport network would provide more people with real alternatives to car use. This applies particularly in areas such as the north of the City of Moreland, where access to and investment in public transport has been lower than in the inner city. Such improvements could include the duplication and extension of the Upfield railway line and improved bus services providing cross-town connections as well as better access to train stations.

This plan should also include walking and cycling as key transport modes which have historically received less attention from state government. The COVID-19 pandemic and its impact on how people travel have demonstrated the importance of these modes, and how supporting these modes is essential to avoid unmanageable increases in motor vehicle traffic.

The plan should identify where infrastructure upgrades are required to support areas which have experienced significant population growth. Such areas include many parts of the City of Moreland.

34. Review Victoria's infrastructure contribution system to cover gaps

A critical issue for many councils is how to fund upgrades or duplication of civil and social infrastructure in a rate-capped environment. Increasingly, middle ring councils are looking to planning scheme mechanisms to make a greater contribution towards this cost.

Many, if not most, middle ring municipalities are directing a substantial proportion of their strategic planning staff and project resources towards developing, monitoring and reviewing Development Contributions Plans (DCPs). The Infrastructure Contributions Plan (ICP) levy rate is \$217,763 per dwelling, whereas a DCP is capped at \$1,210¹.

This issue was examined by the Victorian Auditor General in 2020.

<https://www.audit.vic.gov.au/report/managing-development-contributions?section=>

¹ <https://www.planning.vic.gov.au/policy-and-strategy/infrastructure-contributions>

Reform of developer contributions in established areas to make available a standard, substantial levy in established areas is urgently required.

At the same time, many middle ring councils need to provide new open space to meet the needs of their rapidly growing community. Moreland, like other councils, has taken the negotiation out of open space contributions through inclusion of a planning scheme Schedule to Clause 53.01. Neither the negotiable 5% cash in lieu requirement in the Subdivision Act, nor the non-negotiable contributions within planning schemes, come anywhere near funding the cost of purchasing land and constructing parks in established areas. This is particularly true in suburbs with higher land values. At least two middle ring councils are partway through planning scheme amendment processes, seeking cash in lieu of open space contributions of 10%.

It would be helpful if the state infrastructure strategy established baseline data and targets per person for all state and local infrastructure. This would give transparency for both levels of government about where to direct available resources and establish the strategic basis of planning scheme amendments for infrastructure and open space levies.

It would also be helpful if the infrastructure strategy set quantitative and qualitative targets for different types of infrastructure. These targets could be supported by interactive heat maps showing current levels of service across the state, and what the level of service would be at a selected date under a do-nothing scenario using Victoria in Future (VIF) population growth forecasts.

This approach would:

- Support Council advocacy for state government expenditure in their municipality
- Inform Council's 10 year infrastructure and financial plans
- Provide a baseline for Development Contributions and open space levies in the planning scheme
- Support Council's affordable housing advocacy
- Provide stakeholders with an evidence base showing how a particular municipality, and different parts of that municipality, compare with other parts of Melbourne and the regions.

The interactive mapping accompanying Infrastructure Australia's Future Cities strategy is a good example of such a tool (<https://www.infrastructureaustralia.gov.au/publications/future-cities-planning-our-growing-population>).

38. Partner with local governments to fund pedestrian infrastructure

Walking is a key transport mode that has historically received little attention from state government and has been left to individual local governments. Councils are responsible for many aspects of the pedestrian experience, including constructing and maintaining footpaths, as well as street lighting. However the state government, through the Department of Transport, has a key role in delivering or approving key improvements such as new crossings or higher priority at traffic signals.

The impact COVID-19 has had on how we travel has demonstrated the importance of walking where possible. Key benefits include mitigating increases in motor vehicle traffic, leaving room on public transport services for those who need it most, as well as physical and mental health benefits of walking. Walking is also a component of every trip whether it be

walking to and from a public transport mode, walking to and from the shops from the car park, or walking to and from a local destination by foot in its entirety. Walking is integral in each trip people take and needs to be at the front of minds of all levels of government.

Moreland is committed to supporting walking as a form of transport in its own right. Moreland is currently delivering pedestrian improvements in response to the COVID-19 pandemic, including dozens of new pedestrian (zebra) crossings, new pedestrian thresholds and trials of shared zones. These projects are in addition to Moreland's business as usual walking improvements, which include zebra crossings, pedestrian thresholds and refuge islands.

Moreland would welcome a partnership with the state government to improve walkable infrastructure generally, including access to destinations including activity centres and train and tram stations in and near City of Moreland.

39. Transform cycling in Melbourne, Ballarat, Bendigo and Geelong

As with walking, cycling has generally been considered primarily the responsibility of local government. One exception to this approach is complementary cycling infrastructure delivered alongside major road or rail projects.

While local governments do play a key role in delivering cycling infrastructure, the state government has a crucial role with regards to infrastructure on arterial roads, priority at traffic signals and routes that span multiple local government areas.

As identified in Infrastructure Victoria's report *Five year focus: immediate actions to tackle congestion*, there is significant potential to increase cycling for transport in suburbs near key employment areas. The report found that only 25 per cent of the potential cycling 'market' has been captured to date in Brunswick, Brunswick East and Brunswick West. Safe, comfortable routes are key to encouraging 'interested but concerned' non-cyclists. This is particularly true for under-represented groups such as women, children and older people.

Cycling infrastructure is vital not only in the inner suburbs but also across metropolitan Melbourne, even where trips to work exceed typical cycling distances. In these areas, cycling can play a key role in accessing local shops and services, as well as extending the catchment of train stations to non-car access.

Moreland is committed to supporting an increase in cycling and greater safety for cyclists. Moreland is delivering several trial separated bicycle lanes, as part of the transport response to the COVID-19 pandemic. This is on top of Moreland's regular capital works program of cycling improvements.

41. Reallocate road space towards priority transport modes

The *Moreland Integrated Transport Strategy (MITS) 2019* states that Moreland will reallocate road space and car parks for sustainable transport improvements, as well as for greening which positively contributes to the pedestrian environment.

MITS 2019 also states that Moreland will conduct road closures that help reduce 'rat-running' of traffic through residential areas, improve cycling connections, and improve place quality.

Moreland is currently reallocating road space through its COVID-19 response bicycle projects, as well as through other projects such as new bicycle lanes on De Carle Street, Coburg.

Moreland would welcome state government work to reallocate road space to support sustainable transport modes in appropriate locations. Moreland requests that consultation with local communities be a key part of any such changes.

42. Redesign tram routes

Moreland strongly supports this recommendation particularly in terms of increasing tram capacity in suburbs that have experienced significant growth. Increased capacity is particularly important to maintain social distancing on tram services to reduce the risk of COVID-19 transmission.

Consideration should also be given to extensions of tram routes, such as extending Route 58 into Pascoe Vale and Route 19 into Fawkner or even Campbellfield.

44. Plan for public transport accessibility, including tram stop upgrades

Moreland strongly supports this recommendation, as the current lack of accessibility on the tram network significantly constrains the mobility of people with mobility issues in Moreland. Improving accessibility would also deliver improvements for others, including those with health issues that make steps difficult, as well as parents with prams or passengers with personal shopping trolleys.

Moreland supports the development of an Accessible Public Transport Action Plan which considers all types of disabilities, not only mobility issues, to ensure the entire public transport network is accessible for all.

One of the key objectives of *MITTS 2019* is accessibility and equity for all. Moreland considers that improved accessibility of public transport services is a key outcome when it advocates to state government.

45. Adopt peak and off-peak public transport fares

Moreland notes that the state government has recently introduced off-peak public transport pricing on a temporary basis to assist in social distancing. Moreland welcomes this change in terms of making better use of public transport infrastructure capacity, as well as providing more affordable travel options for those who have flexibility regarding when they travel.

Moreland suggests that the impacts of this off-peak discount be monitored and evaluated to determine what impact it has on spreading demand outside peak times.

46. Price each public transport mode differently

Moreland supports in principle changes to transport pricing that could encourage more efficient use of existing public transport infrastructure and services. Such pricing could also deliver more equitable outcomes. In particular, Moreland supports measures that increase uptake of bus services.

In making any changes it will be important to ensure the system remains easy for passengers to understand and use. This should be true for occasional public transport users as well as for people with limited literacy or English language ability.

Moreland suggests that any changes be informed by user experience testing as well as consultation with groups that may be affected by change. Such groups include older people and people with lower English language ability.

48. Remove annual charges while introducing distance-based pricing for electric vehicles

Moreland supports the concept of distance-based road user charges, however strongly disagrees that this should be initially targeted at electric vehicles (EVs). Australia currently has extremely low sales of electric vehicles, in large part due to a lack of government support. Sales of EVs must increase if carbon targets at all levels of government are to be met. Moreland considers that a tax focussing on EVs will significantly reduce the sales of EVs and further damage the industry. Therefore, Moreland does not agree that EVs should be the test case for a new tax. Reform of road charging should focus on heavy fleet, which is responsible for a high percentage of road wear and is currently subsidised.

50. Increase and extend the Melbourne Congestion Levy on parking

Part of the City of Moreland is covered by the Parking Congestion Levy area (Category 2). However, this levy does not apply to comparable inner-city areas to the east and south-east of the CBD, such as Richmond and South Yarra. Moreland is supportive of an approach that treats similar inner suburban areas equitably.

Moreland has repeatedly requested that the state government enter into a revenue-sharing agreement in relation to levy charges in the City of Moreland. Moreland is aware that the state government has such an agreement with the City of Melbourne. Moreland asks that funds raised through the levy are either shared with local governments or used to fund sustainable transport improvements in their areas.

Moreland also suggests that the levy be reviewed to examine whether it is achieving its stated purpose and that this review is made public. Currently the levy applies to publicly accessible car parks that attract fees but does not apply if the car parks are free. This creates a perverse incentive not to charge for parking, thus encouraging car travel and demand for car parking.

51. Incorporate congestion pricing into all new metropolitan freeways, bridges and tunnels

52. Trial full-scale congestion pricing in inner Melbourne

Moreland is supportive of pricing which encourages travel outside peak times and makes more efficient use of infrastructure. However, any pricing structure should consider equity issues and impacts on those least able to pay.

53. Trial demand-responsive pricing on parking in inner Melbourne

Moreland is supportive of a demand responsive pricing structure that ensures some parking spaces are always available, reduces congestion associated with 'cruising' for a parking space, and avoids users paying more than is necessary to achieve these outcomes.

It is vital that equity issues be considered in the development of any pricing structure, to ensure those who are least able to pay are not disadvantaged.

Moreland also asks that any trials outside the City of Melbourne begin with areas that have good access by non-car modes, and that local governments and communities are involved in the development of any trial.

54. Price parking at major public transport hubs, all train stations and park-and-rides

As per Moreland's response to the above recommendation, it is recommended that any such change consider equity issues, begin with areas that have good access by non-car modes and involve local governments and communities.

Pricing should be demand responsive, which may mean parking is free at off-peak times where occupancy is low. Moreland would welcome a pricing structure that includes concession discounts.

57. Rapidly renew old public housing

Moreland strongly supports the recommendation to renew public housing stock. The underlying land holdings are also precious public assets and should be retained in the control of public bodies to deliver social housing and other community infrastructure in the future.

A significant proportion of the 2200 socially-rented homes in City of Moreland are old and in poor condition. These homes typically contribute to poor health outcomes for residents (many of whom have chronic health issues) and inefficient land use outcomes for our communities.

There is an urgent need to renew and/or retrofit all old social housing (whether public or community housing) for thermal comfort, with associated health, utility cost and emissions saving benefits. The final report of the Moreland City Council Cooling Communities project (2017) concluded that 'with hot weather and heatwaves set to become more common, occupant exposure to heat stress is likely to be exacerbated in the future unless urgent action is taken' to improve old dwellings.

A state-backed large-scale retrofit program, to substantially improve the thermal performance of existing social housing properties, has the potential to quickly build the capacity of the business sector that delivers energy/building performance retrofits (a current constraint to improving the energy and emissions performance of Victoria's public and private homes). Scaling up the capacity and competitiveness of the retrofitting sector could be an engine for green skills and jobs growth over the coming decade in Victoria, aligned to local and state targets for net zero emissions. Such an investment is a core 'no regrets' climate adaptation action, justified on economic, wellbeing and environmental grounds.

In renewing public housing, Moreland's experience with the redevelopment of walk-up flats at Gronn Place in West Brunswick has shown how relocation to facilitate renewal can place additional strain on scarce social housing supply. Such relocation also has adverse impacts on residents, due to the disruption of strong social and mutual aid networks. The Olympia Housing Initiative, which has strong partnerships with Banyule Council, other community service organisations and, critically, residents, points the way to how Homes Victoria could approach this task in the future. A genuine commitment to co-design, which starts with

sharing information on housing audits and plans, will maximise outcomes and would contrast with the piecemeal and inconsistent approaches we have seen in the past.

It is crucial that new social housing is designed and built to high standards that will deliver energy cost savings, personal comfort, health and overall wellbeing benefits for residents. Passive solar design including appropriate orientation, double glazed windows that can be easily opened and shut, and onsite solar should be typical of any new housing developments.

Section 3: Harness infrastructure for productivity and growth

62. Reshape the metropolitan bus network

Moreland strongly supports improvements to the metropolitan bus network to deliver more regular and reliable services. This is particularly true for suburban areas that do not have access to other public transport modes. Bus services are key to expanding the access catchment of train stations without requiring car travel, thus reducing demand for car parking at train stations.

Moreland strongly supports expansion of the Smart Bus system, including delivery of the previously planned 'Blue Orbital' route.

Some changes could be cost neutral through rationalisation of existing routes. However, it will be important that any changes requiring longer walking distances to reach bus services carefully consider older people and people with disabilities who may be disadvantaged by these changes.

Bus services could also be reviewed together with the delivery of major infrastructure upgrades, such as level crossing removals and associated rebuilding of train stations.

64. Increase suburban rail corridor capacity

Moreland strongly supports improvements to train network capacity. Moreland calls on the state government to deliver the Somerton to Upfield link and duplication of the single-track section at the end of the Upfield rail line. These improvements are identified in Stage 3 of the Rail Network Development Plan. Moreland notes that the government is currently delivering the duplication of the Hurstbridge line between Greensborough and Eltham.

These improvements, together with the construction of the Metro Tunnel, would help address low frequency service on the Upfield line. This line has a maximum of 3-4 services per hour at peak times.

67. Protect a future option for a new cross-city motorway

Moreland has previously opposed the construction of the East West Link.

68. Prioritise and oversee infrastructure delivery in growing communities

Plan Melbourne 2017-2050 contains what is now a long-running objective to house a significant proportion of Melbourne and Victoria's rapidly growing population in established areas of metropolitan Melbourne. *Plan Melbourne* includes an aspiration that 70% of new housing be accommodated in established areas.

This policy aspiration has been very successful and many middle ring municipalities have experienced significant population and housing growth, with high rates of growth forecast to continue. City of Moreland for example has seen a 30% increase in population over the past 10 years and is forecast to see a 50% increase in population over the next 20 years.

Although directing population growth into established areas makes better use of existing infrastructure and is more cost-effective than servicing growth areas, infrastructure in

established areas does have a finite capacity. Such infrastructure includes roads, community centres, kindergartens, maternal and child health facilities, parks and open space, sporting facilities, hospitals and public transport capacity. Resources must be allocated to ensure this infrastructure continues to meet the needs of the growing and more dense population.

71. Target 30% tree canopy coverage in new growth areas

Moreland is strongly supportive of a 30% tree canopy target in growth areas; however, Moreland believes this target should be applied to all of Victoria's redevelopment areas. Moreland has experienced significant urban regeneration and densification in the last 20 years. This has had many positive environmental outcomes however it has come at the expense of City of Moreland's urban canopy. Between 2005 and 2016, overall City of Moreland canopy cover has declined from 15.6% to 14.2%. Urban consolidation is the main cause of the reduction in tree canopy on private land from 12% to 9%. As City of Moreland's housing continues to rapidly increase, this canopy remains under threat.

Moreland has a significant role to play in protecting and increasing our urban canopy. However, Moreland considers that significant changes are required to Victorian Planning regulations to protect existing canopy and require new canopy in planning developments. Moreland has communicated this view to the Victorian State Government's Department of Environment, Land Water and Planning, and Planning in particular. Moreland would welcome a review of planning regulations to meet this 30% target.

Moreland also welcomes the strategy's discussion regarding the effectiveness of native vegetation legislation. Moreland recognises its character as an urban municipality, however it has experienced an ongoing net loss of native vegetation. Moreland does not consider the offset mechanism to be an appropriate replacement program. It is critical that rare remaining native vegetation in urban areas is retained in its current state (i.e., not removed or offset) and that the Victorian Government undertake a substantial review of the Victorian native vegetation and biodiversity offset program.

Moreland welcomes the strategy's acknowledgement of the crucial need for targeted funding for planting, maintenance and replacement. Such funding is not only required for growth areas (e.g., parks in Casey, Melton and Wyndham) but also the whole of Melbourne and Victoria. The Covid-19 pandemic has highlighted this issue, and demonstrated the lack of equity with regards to access to local parkland, biodiversity and nature across our city and state.

73. Set targets to grow social housing

Moreland City Council's *Affordable Housing Action Plan* includes an action to work with the State Government to further requirements for affordable housing to be provided by private development.

Moreland supported and contributed to the MAV submission to the Ministerial Advisory Committee on Planning Mechanisms for Affordable Housing. This submission advocated for the creation of Victorian Planning Provisions for Affordable Housing.

Moreland, like many other inner and middle ring councils, has undertaken a significant amount of strategic work regarding the supply and demand of affordable housing.

The lack of supply of affordable housing has a negative impact on City of Moreland's diverse community. A lack of affordable and safe housing affects people's health and life opportunities. Many homes in high housing stress contain children. Moreland's research has identified a need for at least 7,000 new affordable homes by 2036. Part of this need could be met if the State Government includes mandatory Affordable Housing mechanisms in the Victoria Planning Provisions. However, inclusionary zoning will only meet a small fraction of the need for social housing in City of Moreland and across the state. The State governments needs to increase funding, use surplus land and introduce effective policies to grow social housing.

The commitment in the *Big Housing Build* to deliver 12,000 social and affordable homes over 4 years is a much-needed boost to Victoria's social housing supply. However, sustained investment is required.

Homes Victoria has announced it will be developing a State social and affordable housing strategy. Moreland supports the inclusion of social and affordable housing targets within this strategy.

General feedback

Climate change

Moreland recommends the following actions to make infrastructure more resilient to climate change:

- Scale up financing for climate-resilient infrastructure
- Estimate funding required and help fund the requirements to adapt to climate change and move toward a water sensitive city
- Implement public procurement processes that consider climate resilience when comparing competing bids, by accounting for costs over the asset lifetime
- Review and strengthen regulatory standards, such as technical codes, to promote climate resilience. Climate Resiliency Design Guidelines also need to be developed.
- Develop a state government strategy to ensure robust and adaptable drainage of lower-lying areas and green streets, retain rainwater in the upper catchments and reuse stormwater run-off across catchments.
- Victorian Government stormwater policies are implemented almost exclusively through land use planning policy and building codes. This approach focusses on mitigating the risk of floods through drainage. Local government is responsible for most drainage infrastructure to mitigate flood risks up to 5, max 10 years ARI events. Considering the limited budget and resources in local government, Moreland recommends that state government should increase guidance and funding in order to meet water-sensitive city targets.
- Prior to the late 1970s, drainage systems were only required to accommodate water from storms with a 5-year Average Recurrence Interval (ARI). From that point on, drainage systems in new land developments have been required to accommodate much higher stormwater flows, of up to a 100-year ARI. Most of Melbourne's middle-ring councils, including Moreland, were developed in the 1970s, and as a result their drainage systems are only designed for 5-year ARIs. Combined with intense development, which increases the proportion of impervious land, this increases the risk of flooding. To tackle this issue and achieve Water Sensitive Cities objectives will require high level planning, guidance and funding from state government.
- State government must plan and advocate for high growth areas as well as metropolitan areas. The government budget for renewal of existing infrastructure is significant and it needs to better consider adaptation measures.
- Improve climate risk disclosure to raise awareness of, and encourage efforts to reduce, climate-related risks to infrastructure. The risks around climate change impacts should be clearly communicated to the community.
- Encourage government, local business and clean tech companies to work together and develop local solutions to stimulate green growth and make use of local business expertise

Transport

Moreland has the following broad points of feedback regarding the strategy's transport recommendations:

- Moreland strongly supports the strategy's objective of making better and more efficient use of existing infrastructure and assets, rather than simply building new
- The strategy should include more details on timeframes that Infrastructure Victoria is asking the state government to commit to
- The strategy should refer to the massive impact Covid-19 has had on how we travel. There is now a vital need to encourage walking and cycling as much as possible, to ensure safe capacity of public transport and avoid an increase in motor vehicle traffic.
- The strategy plan should also focus on which improvements to the public transport network would provide more people with real alternatives to car use. This is particularly the case in areas such as the north of Moreland where access to and investment in public transport has been lower than in the inner city. Such improvements could include the duplication and extension of the Upfield railway line, as well as improved bus services providing cross-town connections as well as better access to train stations.
- Moreland recommends accelerated development of intermodal terminals, to coincide with progressive road user charges for long haul freight. Such terminals will improve air quality and reduce road trauma.
- Moreland recommends publishing revised road noise standards, that would ensure protection from road noise based on 24-hour data assessments. In particular, Moreland requests that an overnight requirement be introduced between 12 midnight and 6am for appropriate noise levels.

Built community infrastructure

These comments are specific to 'built' community infrastructure. They do not relate to 'environmental' infrastructure, such as open space.

- The strategy recognises the importance of community infrastructure in delivering positive productivity and liveability outcomes for Victorians. These recommendations are focussed on community infrastructure planning, management and investment in outer urban growth locations and regional Victoria. There is inadequate focus on established urban areas. In these areas, local governments face a myriad challenges in planning and delivering community infrastructure, responding to a diverse and growing community and a changing environment.
- Delivering community infrastructure in urban areas is a building block for social sustainability. It is also essential for achieving Plan Melbourne's objective of local living within 20-minute neighbourhoods.
- Support for local government in established urban areas could be provided through two measures:
 - A suite of planning guidelines, resources and tools for local government to plan community infrastructure in existing urban areas (see our feedback on recommendation #34)
 - Facilitation of an inter-governmental and inter-agency approach to delivering community infrastructure across Victoria. In a similar manner to recommendation #89, this measure would seek to foster partnerships to maximise community benefit.