

# **Brimbank City Council Submission**

## **Draft Western Region Land Use Framework Plan**

October 2021



**Brimbank**  
City Council

# 1. Background

Brimbank City Council (Council) welcomes the opportunity to comment on the draft Western Region Land Use Framework Plan (draft Framework Plan).

The draft Framework Plan responds to an action in Plan Melbourne 2017-2050 that detailed planning, at a regional level, is required to manage growth, guide strategic land use and facilitate long term plans for investment and infrastructure development for a 30 year timeframe.

Six draft Land Use Framework Plans have been prepared for metropolitan Melbourne which seek to align local and state planning policy and provide a basis for working across government to apply nine guiding principles, seven outcomes, 32 directions and 90 policies at a regional and local level, from Plan Melbourne.

The State Government intends to implement the draft Framework Plan into planning schemes across the western region of Melbourne. It is not yet clear how the content will be translated given there are strict rules for drafting content within the new format Planning Policy Framework, and the current document will need to be put into a different format.

The Framework Plan is divided into the following 10 chapters:

1. Introduction
2. Regional snapshot
3. Vision: Western Metro Regional in 2050
4. Productivity
5. Housing Choice
6. Integrated transport
7. Liveability
8. Strong communities
9. Sustainability and resilience
10. Implementation

This submission includes a summary of key concerns as well as feedback on directions, strategies and actions relevant to Council. The submission responds with 'support', 'do not support' or 'support in part' to provide an indication of Council's position on each.

## 2. Summary Response

Council supports 'in principle' the draft Framework Plan, recognising that there are some areas where Council is seeking further clarification, or proposing changes. In general, the draft Framework Plan provides the means for aligning state and local planning strategies, however requires further planning to determine how this can occur.

The key points in Council's Submission are provided below under key topics including the themes identified above:

### **Whole of government delivery**

- There is a significant emphasis on 'state led' planning however it is not clear how this will impact Council's planning powers. As a principle, Council prefers to retain its strategic planning role and planning powers. If the State government assumes greater planning control, appropriate governance structures need to be developed to ensure Council's contribution to the planning process, and provide for appropriate community consultation.

### **Innovation**

- The Western Metro LUFP doesn't adequately reflect and respond to how technical innovations will shape Melbourne's west, and change urban form and structure over the next 30 years e.g., the evolution of mobility, smart cities, urban farming etc.

### **Productivity**

- Brimbank's growth and development opportunities are generally captured, including continued recognition of the Sunshine National Employment and Innovation Cluster (Sunshine NEIC), Sunshine Metropolitan Activity Centre (Sunshine MeAC), delivery of Airport Rail, the Western State Significant Industrial Precinct, the Sunshine Health and Wellbeing Precinct, and mixed use and housing development opportunities in and around activity centres and urban renewal precincts.
- Jobs forecasting figures for the Sunshine NEIC is low considering the investment and planning underway, and it is anticipated these will increase when the economic impacts are better understood.
- The Department of Transport (DOT) is identified to lead the whole-of-government delivery and coordination of Sunshine as a transport precinct. It is not clear what area is included in the Transport Precinct, how this differs from the Sunshine NEIC, and who will lead planning for the Sunshine NEIC.
- The Victorian Planning Authority is identified to lead planning for priority metropolitan and major activity centres and urban renewal areas to maximise their respective strategic opportunities. It is not clear which activity centres and urban renewal areas are prioritised, and the basis for prioritisation.
- The Brimbank part of the Sunbury Green Wedge should be included in the draft Framework Plan, including its role in safeguarding Melbourne Airport, and the need to identify the viable use/s of this land in the future.

## **Housing choice**

- Medium and higher density housing is identified is and around the Sunshine MeAC, Ballarat Road and major activity centres in the Sunshine NEIC. Council highlights that significant strategic work is required to inform the location and appropriateness of intensification including Structure Plans, a revised Brimbank Housing Strategy, and other strategic planning to inform and facilitate appropriate housing development.
- A range of actions are identified to promote affordable housing however delivery remains uncertain and is still limited to the agreement of government in providing land, and voluntary agreements negotiated with landowners during the planning scheme amendment or planning permit stage. Additional measures will be required to adequately manage affordable housing supply.

## **Integrated Transport**

- There should be greater recognition of the transport disadvantage that exists in areas of Brimbank to drive greater investment into expanded and high frequency bus services and active transport.
- Implementation of the Western Rail Plan should be identified, including the electrification of the Deer Park Rail line as a priority project, and the Suburban Rail Loop (west).
- Minimising negative impacts of major transport improvements should apply to all major transport improvements including the Melbourne Airport Rail, Inland Rail, the WIFT and existing rail upgrades.
- Major transport investment should promote increased community use and sustainability through modal shift and bundle the delivery of shared user paths.
- Airport safeguarding should not prevent the appropriate growth and development of the Sunshine MeAC and Sunshine NEIC, including higher density residential development.

## **Liveability**

- The Maribyrnong River and corridor should be individually listed as a key landscape and biodiversity area in Table 13.
- A community/tourism site should be listed on Map 7 for H.V. McKay Sunshine Harvester Heritage located in Sunshine.
- There should be stronger direction for the protection of heritage, including when delivering major transport, education and other investment.
- There should be greater recognition of biodiversity, including threatened habitat in the middle and inner west. This should also include complex sites like Solomon Heights and the industrially zoned land in the River Valley Estate, which have federally significant and critically endangered flora and fauna that may prevent future development. While these sites are zoned industrial, the environmental values are so significant, they may not be able to be developed and should be re-evaluated in terms of their status in the Melbourne Industrial and Commercial Land Use Plan and potential contribution to the conservation of biodiversity habitat in the western region.

- There should be greater direction provided about the potential to establish habitat corridors as part of regional biodiversity planning. There should be greater direction about an open space network along the Maribyrnong River, including a shared user path.
- There should be appropriate direction to help resolve viable uses in the Brimbank part of the Sunbury Green Wedge.

### **Strong Communities**

- There is a lack of recognition for key assets in Brimbank including the St Albans Arts Community Centre (and Bowery Theatre) and Brimbank Aquatic and Wellness Centre.
- The University of Melbourne's Western Clinic School should be recognised given it is located in Sunshine, Footscray and Williamstown Hospitals.

### **Sustainability and Resilience**

- The Western Metro LUFP perpetuates the role of the Western region as the main location for waste and resource recovery in metropolitan Melbourne. These facilities have significant amenity implications for surrounding communities and is an unfair burden on Melbourne's west. There should be direction to address and improve operations to existing facilities that continue to have a negative amenity impact on surrounding residential communities.
- There should be greater direction on how State government will support and fund the remediation of former regional and metropolitan landfills so they make a positive contribution to local communities, and redress the legacy and amenity impacts of their operation.

### **Implementation**

- Direction should be given about the establishment of appropriate governance structures to address council involvement and delegation, including allowing for reporting to councils by council officers, particularly where there are financial implications for councils.
- Direction should be included that State Government will formally consult councils about regional plans, including full exhibition and review rights for planning scheme amendments. Council seeks further consultation by the State Government about changes to the Brimbank Planning Scheme to introduce the Western Metro LUFP.
- Regard should be given to the impact on Council resourcing to allow participation in identified projects, and how this will impact Council Plan priorities, which are established through the Council Plan.
- The timeline needs to recognise the range of other strategic work underway that informs these projects, and that these projects may take significant time to complete.
- Melbourne's west should be a priority area for public investment given considerable underinvestment over many decades in comparison to infrastructure and services that exist in other regions of metropolitan Melbourne.

### 3. Introduction (Chapter 1)

#### **Designation of places**

The draft Framework Plan confirms Plan Melbourne allocation of the Sunshine NEIC and the Sunshine Metropolitan Activity Centre (MeAC) as State Significant infrastructure which is supported. Questions in relation to other State level assets/locations include:

- Greater clarification is required about the purpose and role of Transport Gateways and why they are important.
- The Sunshine Health and/or Education Precinct should include University of Melbourne in addition to Victoria University.
- The Albion Quarter is recognised as an Urban Renewal Precinct but is not captured on the 2050 Framework Plan.
- Melbourne Airport Rail, West Gate Tunnel and Metro Tunnel are all recognised as 'City Shaping Projects'. The Suburban Rail Loop (east) has also been recognised however key projects like the Suburban Rail Loop (west), Western Rail Plan, and electrification of the Melton rail line are missing.
- The draft Framework Plan nominates places of regional significance and should include:
  - Where Activity Corridors are located.
  - Regionally-significant industrial precincts (RSIPs) – that Solomon Heights and River Valley have significant impediments to development including the presence of critically endangered grasslands.
  - Enterprise precincts - includes Brooklyn and the potential for flexible uses. It is highlighted that this should not undermine the state significance of this area as an industrial precinct.
- It is unclear where the inter-regional environmental features are located.
- There has been limited investment into regional open space in Brimbank despite the existence of Brimbank Park. The draft Framework Plan needs to give greater recognition to the Maribyrnong River to ensure implementation of the Waterways of the West Action Plan (WOW Plan) and attract further investment.
- Urban renewal areas - It is unclear how sites have been allocated as urban renewal sites and the provision of criteria would be useful to help identify other sites that may exist. The designation of Broadcast Australia may require review given a recent decision from the Minister for Planning which requires approximately 40% of the site to be set aside for conservation purposes.
- Housing opportunity and investigation areas - have been identified along St Albans Road between Ginifer Railway Station and the St Albans Major Activity Centre, and along Ballarat Road. While it is noted that these locations are investigation areas, it is suggested that this section should highlight that further strategic work is required with consideration to a range of matters including contamination, landfill and other buffers, and heritage to name a few, to support the location of housing in these area.

- Green wedges are only recognised in Melton and Wyndham. The part of Sunbury Green Wedge located in the City of Brimbank should also be reflected in the draft Framework Plan.

### **State-led planning**

- The Sunshine NEIC and the Sunshine MeAC have been recognised as priority areas for State led planning with the Department of Transport (DOT) nominated as leading the delivery and coordination of Sunshine as a Transport Precinct.
- The intent is to maximise land use and infrastructure integration, attract investment, and deliver housing jobs and services, and that Council would be a partner. It is not clear what the 'partnership' model looks like, or the level of 'involvement' Council will have. Nor is it clear what area is attributed to the Transport Precinct given it is different from both the Sunshine NEIC and the Sunshine MeAC. It is also highlighted that DOT is not a planning authority at this current time.
- Similarly, it is not clear how Council would be engaged by Victorian Planning Authority (VPA), who are identified as a key lead for activity centre planning.
- Council is keen to ensure that its planning role is not substantially diminished, and the model allows it to make a meaningful contribution to the planning process, as well as community. As a principle, Council prefers to retain its planning authority and responsible authority roles, however, concedes that in some cases, like state transport infrastructure delivery i.e. Regional Rail Link, it may be appropriate for the Minister for Planning to be the planning authority. There is concern about the extent to which the Minister for Transport may plan for the Brimbank municipality, and the diminished role of Council and community in the process.
- More information is required on how a partnership model will work with consideration to a range of important matters including the contribution of Council officers, decisions of Council, Council's role in representing the community, how differences between Council, DOT and VPA are managed, and if Council will be afforded opportunity to formally consider matters in Chamber, and ensuring there is adequate timelines and community engagement.

### **Growth area planning**

- Brimbank is not located within a 'growth area' however it is highlighted that designated urban renewal areas have similar needs in terms of investment and resourcing to fund and deliver infrastructure and servicing. A balanced approach to investment, for both areas, is important.
- There are a number of strategies and actions that acknowledge the need for appropriate staging and the need for timely delivery of infrastructure and services. While the growth areas are identified as a key beneficiary, this also applies to some urban renewal areas also, and hasn't been captured in the draft Framework Plan
- The draft Framework Plan does not go far enough in committing investment in infrastructure and services, and should provide direction for how this will be delivered once planning has been completed.



## The broader context

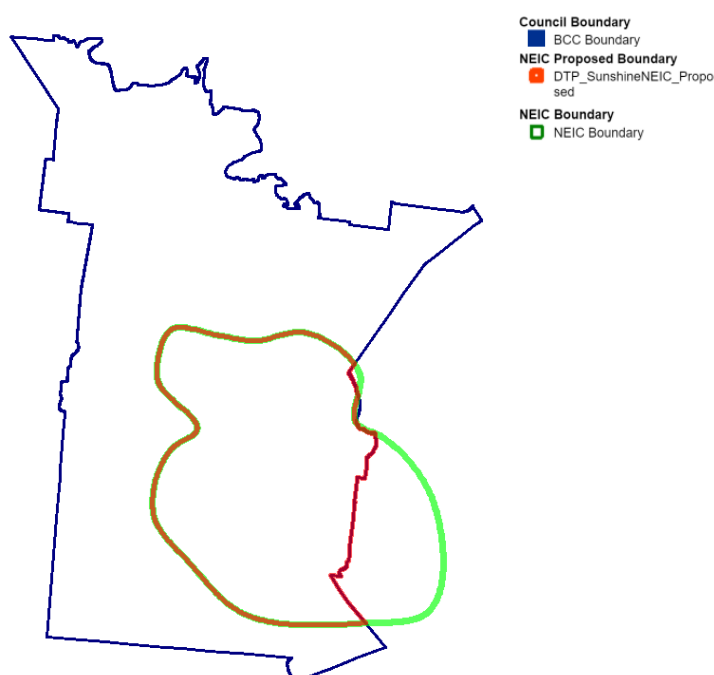
- The commitment to climate change seeks to reduce emissions to net zero by 2050 with a focus on renewable energy, light vehicle sales and land restoration and carbon farming. It is proposed that investment in both public and active transport should also be included.
- Council partially supports the aim of delivering 20-minute neighbourhoods through the structure planning process, however submits that a clear set of criteria, needs to be prepared to ensure consistent application of true 20-minute neighbourhoods across the state.
  - Council recently commissioned an analysis to inform a review of the Brimbank Housing Strategy which highlighted that areas proximate to transport, particularly public transport, are areas that should support housing growth. However the level of transport amenity differs across Brimbank and there is significant transport disadvantage in some locations. On this basis housing growth settings should be appropriate to the level of transport and other services that an area provides. For example areas that only have cycle and walking paths and/or those not connected to existing activity centres/community infrastructure and public transport may not be suited to increased densities (p.06-07) unless significant transport investment is committed with clear mechanisms to deliver services and infrastructure, including infrastructure that is often delivered by the private sector (e.g. child care or medical facilities).
  - A compromised version which based on cycle and walking paths, and not public transport, should only be allocated to areas where it is logical for these types of modes to be utilised. For example, if a school, childcare centre or community facility is not within walkable distance, it is highly unlikely that walking or cycling will be the mode of preference. Unfortunately middle and outer areas have a higher reliance on the car, in part due to inadequate public transport and facilities that are not located close to homes, in comparison to the east and south-east, where there tends to be greater service provision and public transport.
- Council agrees that City shaping projects are a mechanism to generate positive economic outcomes and improve movement around the municipality and the surrounding region, however these projects should not be at the expense of the loss of significant social, environmental or heritage assets (p.08). There should also be an equitable distribution of projects across metropolitan Melbourne that respond to need. Key projects that have been omitted, and should be included are the delivery of Suburban Rail Loop to the western region, and electrification of the Deer Park Line.
- The draft Framework Plan does not acknowledge the economic and social impact that the pandemic is having on development and growth scenarios. With specific reference to. Council believes Covid-19 has delayed realisation of the intended built form outcome for the Sunshine NEIC and the Sunshine MeAC (p.08), as well as other these areas, and this is discussed in previously mentioned analysis to inform preparation of the revised Brimbank Housing Strategy.

## 4. Chapter 2: Regional Snapshot

- The draft Framework Plan identifies the greatest change to transport will be a 10% reduction of private vehicle use for journey to work, and that this will be taken up predominately by train trips. While a number of Council policies and strategies support achieving these goals to combat Climate Change, it is unclear how this will be achieved in Brimbank, particularly given the lack of commitment to fund the Western Rail Plan (including electrification of Melton Rail). While transport rich areas will be more capable of achieving this goal, further projects should be identified to address transport disadvantage in areas like Brimbank and elsewhere.
- The target of 20% urban tree canopy cover is less than the Brimbank Urban Forest Strategy, which seeks to achieve 30% cover by 2046. It is noted that the 20% cover does align with Greening the West, and on this basis is supported.
- There should be more guidance about the importance of habitats that are reflective of the western region including grasslands, wetlands, woodlands and other conservation areas.

## 5. Chapter 3: Vision: West Metro Region in 2050

- The Sunshine NEIC map within the Western Region 2050 Map, shows a boundary significantly larger than the area in Plan Melbourne and the VPA's draft Sunshine National Employment and Innovation Cluster Framework Plan in 2017. While this boundary may not be fixed and subject to further work by DOT, its depiction may be interpreted as having a level of certainty regardless of the strategic work to follow.
- Given strategic work has not been completed, Council submits that the area should be identified in a different way so not be specific to allow for changes as a result of further work.
- The map of Brimbank municipality (shown below in blue), includes the proposed Sunshine NEIC boundary (in green), and the red boundary delineates shows the municipal boundary between Brimbank and Maribyrnong Councils. This Sunshine NEIC area, if approved, is around 48.01 sq. km, with 37.56 sq. km within Brimbank and is approximately 30% of the municipality. The size of the Sunshine NEIC and the identification of DOT as the lead for planning significantly changes Council's planning role. Further detail is required on how Council and community will be engaged and governance and decision making structures.



## 6. Chapter 4: Productivity

### **State of Play / Regional Strengths/ Regional Challenges**

- Figure 6 identifies anticipated job growth to 2031 with a growth rate of 1.4% for Brimbank, which is similar to Hobsons Bay. All other municipalities have a growth rate of 2.8% and above. The Brimbank rate is considered low given investment and planning for the Sunshine NEIC and other Brimbank employment areas. It is proposed the draft Framework Plan identify that this is expected to increase when planning is completed.
- Brimbank contains significant areas of industrial land and manufacturing jobs. In addition to opportunities with the Sunshine NEIC, Council has also identified growth opportunities in food and beverage manufacturing, advance manufacturing, and transport and logistics sectors. This is in addition to healthcare, education, arts and recreation and professional services and those jobs that have emerged in line with global trends. Future planning should recognise the need to accommodate a diversity of industry sectors, including manufacturing, which has become even more important as a learning from the pandemic.
- Council supports the importance of protecting key land in the Western State Significant Industrial Precinct, including designated Major Hazard Facilities from sensitive uses. More information is required on how to manage these situations when sensitive uses are already encroaching on these areas, and the establishment of buffers.
- Table 5 should identify University of Melbourne which forms part of the Health and Education Precinct at the Sunshine Hospital.
- The draft Framework Plan acknowledges the issue of contaminated land in Melbourne's west, which is due to its industrial past and role in storing waste. Remedial work is important to address contamination and a greater emphasis on this work helping to determine the development potential of land. Further consideration should be given to assisting councils and land owners to fund remediation.

### **Direction 1: Manage and plan for industrial precincts in the Western Metro Region to be continued generators of economic activity and employment.**

- The draft Framework Plan indicates that 'major infrastructure will need to be maintained to preserve the future productivity of the area' (page 23). Further clarity is required about what this infrastructure is and how it may impact the municipality.
- Council seeks involvement in the review of planning controls for hazardous facilities and Major Hazard Facilities. Determining the actual impact of these facilities is a key issue, and should occur in a timely manner given development pressures and the potential for legacy issues, and growth forecasts.
- Council highlights that any 'flexible uses such as affordable workspaces' requires further consideration including Ministerial Direction 1, car parking requirements, and whether the definitions in the planning scheme currently support this.

- Guidance is required on how to manage requests to rezone 'regionally significant industrial' that pre date the draft Framework Plan, noting that Strategy 02 requires regionally significant industrial land to remain as 'key industrial areas' or other employment uses and Strategy 05 requires the retention of that land.
- Table 4 does not capture all 'regionally significant industrial precincts' in the Western Region Map.

Strategy	Response
1. Use a coordinated and consistent approach to planning for the Western Industrial Precinct to ensure it continues to provide important employment land for the region in the future.	Partial Support  Subject to greater detail and council involvement.
2. Ensure regionally-significant industrial land remains as key industrial areas or as locations that can provide for, or transition to, a broader range of employment opportunities.	Support
3. Identify industrial areas that could provide for other employment uses that support or are well connected to adjacent employment uses or transport connections.	Partial Support  Employment uses should not undermine the industrial zone, given that some employment uses can be sensitive.
4. Strengthen the national logistics role of the west of Melbourne, including the development of the Western Interstate Freight Terminal, subject to completion of a business case, and leverage both local and regional economic growth opportunities from this investment.	Support
5. Retain regionally-significant industrial land by managing encroachment by other uses that would cause fragmentation and may compromise the development and efficient operation of existing businesses.	Partial Support  While this strategy is supported there is no direction in the implementation plan on how to deliver this. Encroachment is a key legacy matter in Brimbank, and the ability to understand the true nature of this encroachment and to identify how to manage it is complex and costly. Greater support for this type of work is required, particularly from Environmental Protection Authority (EPA) and Worksafe.

## **Direction 2: Facilitate the development of the Sunshine and Werribee NEICs as major economic contributors for the regional and national economy**

- Council supports a holistic approach to planning and investment in the Sunshine NEIC so they make major contributions to the regional and national economy.
- Council highlights the importance of delivering a 'true' super hub in Sunshine, with world class facilities and integration with the surrounding area to encourage people to get off the train and explore Sunshine.
- Council highlights the timely delivery of the Western Rail Plan, specifically the electrification of the Deer Park Railway line to support the role and function of the Sunshine NEIC.
- The Sunshine Transport Priority Precinct is not shown in the draft Framework Plan, and there is confusion between those areas that comprise the Sunshine NEIC, Sunshine MeAC, Sunshine Precinct and Sunshine Transport Priority Precinct.
- The role of Local Government, residents, ratepayers and businesses remain unclear in planning for the area as Stated above. There are some reservations about 30% of Brimbank potentially being planned by a State Government agency and Councils role in the process.
- The key directions contained within the draft Framework for the Sunshine NEIC align with Council's priorities, greater commitment to delivery of the Western Rail Plan is required, including in mapping.
- Acknowledgement of some of the constraints within the Sunshine NEIC is suggested to manage expectations about future work required.

<b>Strategy</b>	<b>Response</b>
6. Strengthen Sunshine and Werribee NEICs as health and education providers and activity clusters in the Western Metro Region.	Support
7. Facilitate land use and economic intensification of Sunshine and Werribee NEICs to leverage transport infrastructure investment and improved public transport connectivity, including Suburban Rail Loop and Geelong Fast Rail.	Partial Support  The term 'leverage' requires further clarification. Council understands that transport investment may increase the attractiveness and viability of the Sunshine NEIC area for development. However, if the term relates to the concept of value capture, where contributions are sought to repay investment, it is considered that this may make development unviable is not supported.
8. Encourage tertiary education, health-related training, health care, and retail and professional service uses in the Sunshine NEIC.	Support

9. Develop Sunshine Metropolitan Activity Centre as a state-significant precinct and fully multifunctional centre and services hub, and support the emergence of a Justice and Legal Services precinct in the centre.	Partial Support  Justice and Legal Services already exist and it proposed that this should be changed to '...and continue to support and expand the existing Justice and Legal Services precinct in the centre'.
10. Support accommodation, entertainment and conference facility uses in the Sunshine Metropolitan Activity Centre to capitalise on transport infrastructure investments, including Melbourne Airport Rail Link.	Support  The Activity Centre Zone already supports these uses however Airport Rail and the Sunshine Super Hub is likely to attract increased interest.
11. Encourage high value manufacturing uses within the Sunshine NEIC's industrial precincts to provide a diversity of employment uses.	Support
12. Develop the Werribee NEIC by facilitating growth in the health, education and high-tech research sectors	Partial support  This strategy should apply to both Sunshine and Werribee NEICs.

- The following comments are made about Figure 9 and the Sunshine NEIC:
  - More information is required on how local connectivity will be improved by 'reinforcing and improving Ballarat Road'. As an important east-west connection that suffers from congestion, with local and regional trips, the direction to reinforce its role potentially will lead to increased congestion. Council highlights the importance of delivering the Western Rail Plan, particularly the electrification of the Deer Park rail line to encourage modal shift to reduce congestion from the western growth areas.
  - It is noted that the Werribee NEIC plan includes a number of additional elements like schools and law courts, which also exist in Sunshine and should be captured also.

**Direction 3: Support the development of a strong network of activity centres to provide jobs closer to where people live.**

- The statement that the Deer Park Major Activity Centre is not easily accessible by train is incorrect. The Centre is located 800 metres from the Deer Park Railway Station. Direct pedestrian and cycle access is provided on a shared path along Byrne and Burnside Streets, connecting to Ballarat Road in the middle of the centre. (p.30).
- Table 7:
  - Should outline existing attributes of the Sunshine Metropolitan Activity Centre, in addition to the bullet points. The quantum of underdeveloped land is a unique attribute that provides the opportunity for future growth and development.
  - Include heritage buildings, potential contamination and buffers column 'to be considered' in this table.

- Identifies the future role/ strategic opportunities for the Deer Park Activity Centre. This includes encourage residential development in surrounding areas and contradicts commentary in the Framework Plan that Deer Park is not well located to public transport and that housing close to MHZ is constrained. The draft Framework Plan needs to be consistent and updated accordingly.
- The existing attributes column to Table 7 should be updated to include the St Albans Library.

Strategy	Response
13. Direct high-value jobs and higher-density development to activity centres, in particular the Footscray and Sunshine metropolitan activity centres as well as suitable major activity centres	<p>Support</p> <p>This strategy suggests that a metropolitan activity centre (MeAC) and major activity centres are not necessarily different, and should be in terms of their hierarchy so that MeACs fulfil their anticipated role.</p> <p>In practice, land is often more affordable in lower order centres, therefore potentially more attractive to development and renewal. This could have the unintended consequence in terms of eroding the hierarchy. A clear delineation between both levels of centres is required.</p>
14. Support the viability of existing activity centres by discouraging out-of-centre commercial development	Support
15. Retain existing commercial zoned land and identify areas that can support future demand for commercial floorspace and new investment with a focus on metropolitan and major activity centres.	Support

**Direction 4: Ensure the Western Growth Corridor accommodates longer-term industrial and commercial development opportunities.**

*Only strategies considered to have relevance to Brimbank have been captured below.*

Strategy	Response
16. Consider the future demand and need for commercial and employment land across the Western Growth Corridor and ensure that Precinct Structure Plans make sufficient provision to accommodate longer-term commercial and employment needs.	<p>Support</p> <p>The Framework Plan states that there is a need for an additional 53% more commercial floor space, although it unclear if this forms part of a review of previously approved PSPs. Analysis of commercial and employment land should include existing land in the established areas.</p>



17. Retain and preserve future industrial land identified in the Western Industrial Precinct and at Toolern, Plumpton and south of Werribee for industrial uses.	Support
18. Encourage commercial precincts in the Western Growth Corridor to diversity and incorporate higher-density and finer-grain development as they mature over time.	Support
19. Coordinate and manage the delivery of the Toolern Metropolitan Activity Centre between state and local governments to ensure Toolern develops into a state significant location in the Western Metro Region	Support  Adequate resourcing and investment is required in all state significant locations, and should be timed appropriately to maximise development opportunities.

**Direction 5: Ensure the protection of green wedges and support their role to provide agriculture, extractive resources, tourism and state infrastructure for the long-term benefit of all Victorians.**

- The need and importance of the Melbourne Regional Landfill (MRL) and other resource recovery sites is recognised however greater investment must be directed to alternative and cleaner waste and recycling to reduce the need for traditional landfills.
- Waste and resource recovery appears to be over represented in Melbourne's west and requires greater State government support and investment to address poor practice that impacts the health of surrounding communities.
- Greater State government investment in roads and maintenance of roads is required in Melbourne's west and resource and recovery operations due to significant truck use.
- There is a significant omission of the Sunbury Green Wedge in Table 6. It is acknowledged that the majority of the Sunbury Green Wedge is in the Northern Region Land Use Framework Plan, however the Brimbank part should form part of this draft Framework Plan.

Strategy	Response
<p>20. Protect the operation of state-significant infrastructure assets such as freight and transport corridors, waste management facilities and resource extraction.</p>	<p>Partial Support</p> <p>It is not clear how operations are protected and how competing land uses are managed. The agency of change principle becomes an important consideration in this context. It is considered that there may be times when the cost of protecting State Significant infrastructure is an unfair burden or impost on some communities and municipalities.</p> <p>Within this context, a more tailored approach is required in green wedges to balance other industry like agriculture.</p> <p>Council also highlights its joint submission with Hume City Council to the Melbourne Airport Environs Safeguarding Standing Advisory Committee. The Submission supports the state and national significance of Melbourne Airport however argues that safeguarding can be balanced to achieve the appropriate growth and development of the Sunshine and Broadmeadows MeACs.</p>
<p>21. Ensure the ongoing operation, expansion, or development of new state-significant infrastructure assets avoids or minimises impacts on other green wedge priorities such as agriculture and biodiversity conservation, cultural heritage, landscape and environmental values.</p>	<p>Partial Support</p> <p>Refer to comments under Strategy 20.</p>
<p>22. Protect and optimise the productive potential of agricultural land for agricultural purposes to encourage jobs in the agricultural sector in the Western Metro Region.</p>	<p>Partial Support</p> <p>The draft Framework Plan states that the region's green wedges support agricultural production. Council's submission to the Planning for Melbourne's Green Wedges and Agricultural Land Consultation Paper identified that agricultural land in the Brimbank part of the Sunbury Green Wedge is constrained and is not productive compared to other Green Wedges in the region. The submission requested support to identify and support viable economic development from an agricultural or alternative perspective. The quality of agricultural land should also be a consideration prior to protection.</p>

23. Identify and manage long-term strategic extractive resources in the Western Metro Region.	<p>Partial Support</p> <p>Melbourne's west has a high proportion of extractive industries which can have negative impacts on surrounding communities. The long term burden and impost on surrounding communities must be considered in this process, and communities and councils appropriately consulted to inform any future decisions.</p>
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## Other Matters

**Table: Consideration of the Productivity Actions**

Action	Lead Agency	Response
1. Implement a program of State Government-led collaborative planning projects	VPA implementation in partnership with Council and DELWP	<p>Partial Support</p> <p>This action requires further information for Council to form a position including identification of areas (or criteria), the role of Council be, how the Brimbank community will have input, and if Council be expected to fund any aspect.</p>
2. Prepare a report that sets out a spatial framework for employment precincts and activity centres across the Western Growth Corridor	DELWP in implementation partnership with Councils and DELWP	<p>Partial Support</p> <p>It is not clear how this will be different to local activity centre planning and the hierarchy contained in the West Growth Corridor Plan and subsequent PSPs.</p> <p>If this is part of a review of the PSPs, employment land in the established areas should be a consideration in the methodology of the report.</p>
3. Coordinate the whole of government delivery of the Sunshine NEIC	DOT in implementation partnership with Councils, DELWP and VPA	<p>Partial Support</p> <p>Refer to comments under 'state-led planning' in the Introduction section.</p> <p>If Council's planning authority and responsible authority roles are to be removed, assurances are sought on how Council will be engaged in the planning and decision making process and how matters will be resolved when parties do not agree.</p>
4. Separate to the SERA Pilot Project, identify and implement a SERA in the Western Metro Region in partnership with local government.	DJPR in implementation partnership with Councils, DELWP	<p>Partial Support</p> <p>It is not anticipated that the City of Brimbank would be an appropriate location for a SERA Pilot.</p>

## 7. Chapter 5: Housing Choice

### **State of play**

#### Population Projections

- Table 8, shows actual and projected population projections by Local Government Area over the period of 2016 – 2036 and notes that the impact of Covid-19 has not been considered. These figures should be recast to take the impact of COVID-19 into account, especially considering migration patterns to the western region. It is also anticipated that growth in Brimbank will need to be revised when Sunshine NEIC/Priority Precinct planning is completed.

### **Housing Typology Unique to the West**

- The draft Framework Plan should acknowledge intergenerational households and larger family sizes and the impact this has on the type of dwelling demand. There is a known need for this type of dwelling in Melbourne's west.

### **Environmental Hazards**

- Council agrees that appropriate distances between ongoing and future industrial uses and residential developments must be maintained for the safety and amenity of residents, however highlights there are already land use conflicts within Brimbank. Further guidance is required on how best to address this.
- Improved guidance is required from State government in relation to separation distances between residential uses and major hazard facilities, including how to manage and identify solutions for where this issue already exists.
- New housing and higher density housing in areas constrained by major hazard facilities, contamination and pipelines is discouraged, however, as previously mentioned, often this conflict already exists and guidance is required on how best to manage the risk.
- There examples where residential uses are located on areas that were once contaminated. The draft Framework Plan could provide stronger acknowledgement that this can be achieved when appropriate remediation and mitigation.
- Future housing work should consider capturing known environmental and other constraints on mapping, and will help inform development potential and yield.

### **Map 3, Western Metro Region housing choice 2050**

- The draft Framework Plan defines urban renewal as the process of planning and redeveloping underutilised medium and largescale urban areas, precincts or sites for mixed land use purposes. On this basis, the entire Sunshine MeAC could be considered an urban renewal area and the list of urban renewal sites should be renamed to 'potential mixed use project site' or similar.
- Inset - 'Map ID Urban Renewal Area' number 12 should be updated to reflect the smaller scale of development associated with the Broadcast Australia site due to the Environmental Impact Assessment decision by the Minister for Planning. The

decision has resulted in the need to retain a portion of the site for conservation purposes.

### **Direction 6: Increase the supply of housing in the Western Metro Region**

<b>Strategy</b>	<b>Response</b>
24. Maximise housing development within the established areas of the Western Metro Region to achieve the aspirational housing distribution scenario for metropolitan Melbourne.	<p>Partial Support</p> <p>The majority of new dwellings should be located in established areas that are well serviced by public transport and services. Although it is not clear whether the targets are informed by the range of development constraints that exist across municipalities.</p>

### **Direction 7: Prioritise housing growth in areas with access to job, services and good public transport.**

- Council supports increased density around neighbourhood activity centres where appropriate. Background work to inform Council's Housing Strategy will evaluate the ability for neighbourhood activity centres to accommodate additional housing. Council submits that there should be a clear criteria and monitoring to ensure development within a catchment of a neighbourhood activity centre doesn't dilute development in the major and metropolitan activity centres.
- Table 12 lists locations for medium and higher-density housing. As mentioned above, the 'Broadcast Australia Site' should reflect the recent Ministerial decision.
- Table 12 lists housing opportunity areas which are areas currently zoned Residential Growth Zone (RGZ). Council highlights that development in the RGZ has been difficult to achieve, with a number of VCAT decisions unsupportive. Council will be reviewing this as part of its revised Brimbank Housing Strategy.

<b>Strategy</b>	<b>Response</b>
25. Increase the supply of medium- and higher-density housing around Sunshine and Werribee NEICs, in and around metropolitan and major activity centres, urban renewal areas, SRL precincts, and neighbourhood activity centres serviced by good public transport	<p>Partial Support</p> <p>Greater consideration should be given to the wording of this strategy, which is ambiguous and unclear. This strategy should differentiate where medium and higher density development is appropriate, given the size of the NEICs and that density is informed by a range of factors.</p>
26. Ensure new housing in and around the Sunshine and Werribee NEICs does not encroach on the primary employment and innovation role of the NEICs.	<p>Partial Support</p> <p>While it is understood that the primary intent of the NEIC is related to employment and innovation, the Sunshine NEIC contains longstanding residential areas in and around it, and a balance approach is required.</p>

27. Support substantial housing change in locations where transport upgrades and improvements such as Suburban Rail Loop, Melbourne Airport Rail Link or Regional Rail Link create opportunities to locate housing closer to jobs, services and infrastructure.	<p>Partial Support</p> <p>While the principle intent is understood and supported, there remains a range of inputs that inform decisions about housing to ensure the quality of living for future residents.</p> <p>It is also highlighted that SRL (western section) also needs to be delivered and that new stations should be included, including one in Sunshine North.</p>
28. Maximise development potential in housing investigation areas around existing and proposed railway stations to leverage access to the PPTN.	<p>Partial Support</p> <p>Housing growth adjacent to proposed railway stations requires State government commitment to delivery.</p>

**Direction 8: Provide greater choice and diversity of housing across the Western Metro Region.**

Strategy	Response
29. Encourage a genuine mix of dwelling types and sizes in the Western Metro Region to accommodate the changing future needs of the region.	Support
30. Facilitate the development of housing that is adaptable and flexible to cater for changing demographics and to support 'ageing in place', including residential aged care facilities and retirement housing.	Support
31. Optimise the opportunities for student accommodation and key worker housing around health and/or education precincts in the Western Metro Region	Support
32. Adopt a place-based approach to the delivery of infill housing developments to replace ageing housing stock, ensure a high-quality of design that is appropriate for the local context and contributes to housing supply and diversity.	<p>Support</p> <p>Council agrees that local context is important however questions how placed - based nuances will be achieved using the current planning mechanisms.</p>

**Direction 9: Increase the supply of social and affordable housing.**

- Council recognises access to safe and secure housing as a fundamental human right and key determinant of health and wellbeing. The draft Framework Plan doesn't do enough to facilitate the implementation of social and affordable housing.
- The emphasis on voluntary negotiations is unlikely to deliver the quantum of affordable housing required, and the need for statutory mechanisms that don't disincentivise development, or locations where they apply, are required.

Strategy	Response
33. Facilitate more affordable housing across the region, particularly in locations that have good access to jobs, services and public transport	Supports
34. Support the delivery of social housing, particularly in Brimbank, Maribyrnong, Melton and Wyndham LGAs.	Supports  Social housing should be provided within a mix of private tenure dwellings.

**Direction 10: Improve planning processes for growth areas to ensure the delivery of diverse and vibrant new communities.**

- It is critical for infrastructure in growth areas to be delivered in a timely manner to ensure new communities are provided with the facilities they require (p.69)

Strategy	Response
35. Require development in growth areas to be sequenced and staged at a regional level to better link infrastructure delivery to land release.	Supported.  Infrastructure must be staged for delivery in all areas, not just in the growth areas. There are poorly serviced areas in Brimbank which equally need the investment in infrastructure and services.  There is a considerable imbalance between the servicing of areas in the west in comparison to the east and south-east.
36. Facilitate the development of medium- and higher-density housing in the growth areas to provide greater housing diversity and create 20-minute neighbourhoods close to jobs, services and public transport.	Supported  Demand for housing in Brimbank, and growth areas is currently driven by buyers and renters seeking separate houses, however, given the strategy has a 2050 outlook, it is assumed this demand will increase in growth areas as these areas mature. It is highlighted this may take longer than the draft Framework Plan outlook.

**Table: Consideration of the Housing Actions**

Action	Lead Agency	Response
<p>5. Update planning schemes to align with housing policies in Plan Melbourne and the Western Metro Region Land Use Framework Plan and the implementation of the reformed residential zones.</p> <p>This includes:</p> <ul style="list-style-type: none"> <li>• Providing capacity for 15 years of regional housing supply focusing on locations identified for housing growth in the LUFP;</li> <li>• Reviewing planning controls in housing investigation areas as potential locations for substantial or incremental housing change. This may require strategic planning work to support these changes such as preparing or updating local housing strategies or preparing structure plans to further investigate where increased densities can be supported, and determine specific changes required to planning schemes.</li> </ul>	<p>Councils in implementation partnership with DELWP</p>	<p>Support</p> <p>Council highlights the range of work required to inform this strategy including housing strategies and structure plans which are resource intensive. Council would welcome resourcing and expertise to inform strategic work, and highlights that it has only just an amendment to update the planning policy framework, as well a review of the Brimbank Housing Strategy including the neighbourhood character study and residential development framework process.</p>
<p>6. Identify underutilised and surplus government land that has potential to deliver additional social housing.</p>	<p>DFFH (HV) in implementation partnership with DELWP</p>	<p>Partial Support</p> <p>The opportunity to accommodate social housing on surplus government land should only occur when it meets the requirements with Strategy 33 and is located within a mixed tenure development.</p> <p>A cohesive review of State government land across all government departments would need to occur.</p> <p>Additionally Council would need to undertake a similar review, and consider the opportunity loss, which is challenging in a financial constrained environment.</p>
<p>7. In partnership with councils, identify a pipeline of sites in the Western Metro Region for social and affordable housing.</p>	<p>DFFH (HV) in implementation partnership with Councils</p>	<p>Partial Support</p> <p>Refer to Strategy 6 response.</p>



<p>8. Develop a model and seek support for a whole of-government approach to better sequence and prioritise locations for key services, social infrastructure and public transport access in the development of growth areas to better enable walkable 20-minute neighbourhoods</p>	<p>VPA ) in implementation partnership with Councils, DELWP, DFFH (HV), DH, DOT</p>	<p>Support</p> <p>As indicated previously, this type of focus on growth areas should not impact the delivery of infrastructure in other areas. There are a number of areas in Brimbank where infrastructure and services are significantly lacking.</p> <p>Council notes that work is identified to guide the development of 20 minute neighbourhoods in the draft Framework Plan. This work is critical to achieving this strategy.</p>
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## 8. Chapter 6: Integrated Transport

### State of play / Regional Strengths/ Regional Challenges

- The draft Framework Plan acknowledges that the constrained transport network, high level of car dependence, and increasing congestion, however, provides insufficient strategies and actions that respond to these issues.
- Many actions, worded as a 'reviews' are considered business as usual and don't advance outcomes that will address transport issues and the transport inequity that plagues Melbourne's west.

Key comments about the Western Metro Region Integrated Transport 2050 at Map 6 include:

- It is difficult to read.
- Definition for a PPTN interchange is required (It is not clear if it is a bus, train or both)
- A bus / train interchange is required I at Deer Park Station.
- The map does not show bus connections to Deer Park, Ardeer, Ginifer, St Albans, or Keilor Park train stations.
- The future SRL Stations should be identified, including in Sunshine North, north of Berkshire Road.
- The future Calder Park Station should also be identified.
- The only potential transport project is the Outer Metropolitan Ring/ E6 reservation, despite the draft Framework Plan acknowledging the middle ring and outer suburbs lack public transport infrastructure, and the impact on road congestion and travel time.
- The Western Rail Plan (including electrification of Deer Park Rail), the SRL (west), future stations listed above and tram/rapid transit along Ballarat Road should all included, as have previously been identified by State government.
- Considering the number of bus reviews previously conducted, Council submits that the draft Framework Plan should identify future bus routes in middle ring areas, not just in the growth areas, particularly in areas of Brimbank that have poor public transport access.

### Direction 11: Strengthen connections to the peri-urban and regional areas, to support their role providing services to the regions

Strategy	Response
37. Provide public transport connections from the region to peri-urban areas, regional areas and via Werribee to Geelong.	Support  This strategy should be balanced with investment into public transport movement in the existing western metro region, including middle and growth areas.

38. Improve links to Melbourne Airport, Avalon Airport and interstate and regional destinations while also linking residential and employment growth areas in the north and west of Melbourne and improving access to Avalon Airport, Werribee, Melton, Melbourne Airport, Mickleham and Donnybrook via the OMR.	<p>Partial Support</p> <p>The strategy can also be achieved by investment in other transport projects in the Western Rail Plan and should be broadened.</p>
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## **Direction 12: Improve transport connections to support the productivity of the Western Metro Region**

- The draft Framework Plan lists a number of priority regional public transport improvements and connections, including commuter car parks. Council submits that an improved bus networks that meets the needs of commuters (more direct and higher frequency) can also ease the demand for car parking. This would also provide opportunity for affordable housing and open space.
- Considerable investment into bus services is required to achieve modal shift, so they are reliable, convenient, frequent, integrated and timely.

<b>Strategy</b>	<b>Response</b>
39. Improve connections for the Western Metro Region to Avalon Airport.	<p>Support</p> <p>Public transport connections should be prioritised.</p>
40. Plan new infrastructure to better integrate existing and future communities in the west, rather than creating barriers between them.	Support
41. Improve connectivity and frequency of public transport services and bus connections from interchange hubs servicing residential areas.	<p>Support</p> <p>Investment in bus connections should be prioritised. Brimbank has some of the poorest serviced areas in the region.</p>
42. Locate public transport stops and routes to support late night travel in the Western Metro Region.	Support
43. Plan major infrastructure projects and changes to the freight network to reduce the impact on existing urban areas.	Support
44. Support cycling for transport through the development of Strategic Cycling Corridors in the Western Metro Region, in particular between Sunshine, Footscray and the CBD and north-south regional connections and to the Western Industrial Precinct.	<p>Support</p> <p>Brimbank priorities include:</p>

	<ul style="list-style-type: none"> <li>• North-south connection from Watergardens to Deer Park, via Kings Road and Station Road.</li> <li>• Completion of the east-west link, from Sunshine through to Derrimut, following the Ballarat train line</li> <li>• Completion of a cycleway the full length of St Albans Road, from Sunshine through to Watergardens</li> <li>• An east-west link from St Albans through to Caroline Springs.</li> </ul> <p>Direction is needed that requires cycling improvements to be delivered as part of major investment i.e. Level Crossing Removal Projects.</p>
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**Direction 13: Improve public and active transport access for Sunshine and Werribee NEICs, metropolitan and major activity centres**

- Considerable investment into public transport is required, so that services are frequent, have extended hours, reliable, clean, convenient and safe. Stations should be DDA compliant and provide weather protection.
- Stations in NEICs, MeACs and MACs need greater profile, investment and integration with surrounding areas.

Strategy	Response
45. Provide high-quality public transport access to job rich areas such as Footscray, Sunshine and Toolern metropolitan activity centres, major activity centres, the SSIP and the Werribee NEIC.	Support
46. Improve bus service connectivity prior to the delivery of the Suburban Rail Loop.	Partial Support  This draft Framework Plan needs to include a clear commitment that SRL will be delivered in Melbourne's west.
47. Ensure the planning and design of Suburban Rail Loop maximises opportunities for active transport connections.	Support  This draft Framework Plan needs to include a clear commitment that SRL will be delivered in Melbourne's west.
48. Improve the amenity, walking, cycling and public transport access of the NEICs, activity centres, state- and regionally-significant industrial precincts.	Support  State government funding and support is also required.

49. Provide rail and road interchanges, public transport services and well-integrated active transport networks for emerging employment precincts Werribee NEIC and the Toolern Metropolitan Activity Centre.	Support
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#### **Direction 14: Improve transport connectivity in the growth areas and outer suburbs**

- Brimbank experiences commuters driving from outer growth areas and suburbs to train stations in Brimbank. The electrification of the rail line to Melton will help alleviate some of the commuter parking needs and help reduce some congestion on roads.

<b>Strategy</b>	<b>Response</b>
50. Improve arterial road connections in the greenfield areas and outer suburbs to support improved travel times, safety and reliability.	Supports  Road investment needs to be balanced with public transport improvements to promote modal shift and address congestion.
51. Improve outer suburban public transport, particularly the bus network, to ensure integration with sequenced land use planning and development	Support
52. Plan local bus networks as part of preparation of the PSPs	Support
53. Link trunk transport infrastructure to regional and local public and active transport networks.	Support

#### **Direction 15: Improve active and public transport options to promote mode shift and support 20-minute neighbourhoods**

<b>Strategy</b>	<b>Response</b>
54. Provide active and public transport in new growth area communities	Support
55. Create a network of walking and cycling links for local trips that link to public transport	Support

56. Provide a connected activity centre network through public and active transport	Support
57. Create pedestrian-friendly neighbourhoods by enhancing major pedestrian links and expanding the network.	Support
58. Prioritise sustainable transport in activity centres and health and education precincts to support higher-density mixed-use walkable precincts	Support
59. Provide walking and cycling routes and drop-off zones to health and community services and recreation facilities.	Support

**Direction 16: Support and grow the freight and logistics function of the Western Metro Region**

Strategy	Response
60. Reserve and protect the land and its freight connections for WIFT and Bay West from the encroachment of sensitive or conflicting land uses.	<p>Partial Support</p> <p>Council does not support the location of Western Goods Line proposed through Cairnlea, Albion and Sunshine, and highlights it would have significant amenity impacts on existing community and urban renewal locations.</p> <p>Strategy wording should be strengthened to associate action to 'reserve and protect' within relevant planning schemes.</p>
61. Manage the impact of changing transport access for industrial land in the inner west ahead the completion of the West Gate Tunnel Project.	<p>Partial Support</p> <p>State government should seek to minimise impacts.</p>
62. Plan for the WIFT as a major precinct that will integrate with the surrounding area and adjoining transport network.	Support
63. Minimise negative impacts of major transport improvements such as the OMR and West Gate Tunnel Project on urban amenity.	Support
64. Ensure high-quality arterial road access and designate a preferred rail corridor for the WIFT.	<p>Partial Support</p> <p>Refer to comments at strategy 60.</p>

**Table: Consideration of the Integrated Transport Actions**

Action	Lead Agency	Response
9. Investigate barriers and opportunities to increase public and active transport mode share across the region to support culture change, spread demand on transport infrastructure, reduce greenhouse gas emissions and support 20-minute neighbourhood outcomes. Identify trial locations in the region to focus the investigation.	DOT in implementation partnership with Councils	Support  DELWP has already commenced Pilot 20 minute neighbourhood work with councils in some locations.
10. Undertake a review of the regional bus network to support regional access and movement in the short and medium terms. This should include: <ul style="list-style-type: none"> <li>• early planning of integration with major public transport changes including Suburban Rail Loop, Melbourne Airport Rail</li> <li>• future bus networks in the growth areas, and</li> <li>• bus infrastructure for late night travel options.</li> </ul>	DOT in implementation partnership with Councils	Support  Commitment to implementation is essential.
11. Review the Principal Public Transport Network for the growth areas.	DOT in implementation partnership with Councils, DELWP	Support

**Other Matters**

- Council proposes a bus interchange is included at the new Deer Park Station as part of the Mt Derrimut level crossing removal project.
- Council proposes that the St Albans Road extension is identified in Sunshine, which is identified as part of urban renewal in and around the Albion Station in the Sunshine MeAC.

## 9. Chapter 7: Liveability

The Western Metro Region liveability 2050 at Map 7 should include:

- A community / tourism site for the H.V McKay Harvester Works site in Sunshine. It is of national, if not international significance, and already with remnant heritage site that include interpretative signage in the Sunshine MeAC and surrounds.
- In addition to built and natural tourism assets, municipalities host a range of key festival and events that attract regional and metropolitan visitors. This includes the Sunshine Lantern Festival, St Albans Lunar Festival. These align with Strategy 63 and highlight the importance of planning for spaces to allow for cultural events and activities.
- The Victorian Heritage Register sites on Map 7 is supported, and the focus on cultural heritage, however the draft Framework Plan should provide stronger direction about the protection of heritage values at a local and state level, particularly in locations designated for growth, including the Sunshine NEIC, to ensure planning is responding appropriately to existing site contexts.
- The draft Framework Plan overlooks the protection and enhancement of biodiversity in the established areas of the Western Metro Region, with instead a focus on growth areas. Areas where remnant grasslands exist should be acknowledged, including in Brimbank, and captured in the Liveability mapping.

### State of play / Regional Strengths/ Regional Challenges

- Table 13 should be updated as follows:
  - Include the Maribyrnong River as a sixth major natural waterway, and as an individual feature like the Werribee River. The Maribyrnong River the highest order waterway in the region, and is part of a green wedge. Coordinated regional planning is essential to support waterway health and landscape features. Guidance is available in the Maribyrnong River Design Guidelines.
  - The southern part of the Maribyrnong River and Kororoit Creek should be included as a significant asset for protection and management.

### Direction 17: Draw on the region's cultural heritage to create its future sense of place and identity

Strategy	Response
65. Reflect the different layers and aspects of the region's history in the design of its major buildings, new communities and public spaces.	Support
66. Support places of assembly and multi-use community spaces to provide for community gatherings, festivals, arts and events in the established urban areas and the growth areas.	Support



67. Work with Traditional Owners, stakeholders and government to identify and protect places of cultural heritage significance.	Support
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### **Direction 18: Protect and enhance landscapes and biodiversity of the Western Metro Region**

<b>Strategy</b>	<b>Response</b>
68. Work with Traditional Owners to protect and enhance the landscape qualities and biodiversity of the region's volcanic plains and cones, grasslands, waterways and waterway corridors and coastline.	Support
69. Create breaks for vegetation and biodiversity in urban areas and along waterways and natural drainage networks to foster biodiversity links and provide an opportunity for escape to nature.	Support  As previously highlighted, biodiversity and habitat exists within the inner and middle ring areas of the western metropolitan regional too.
70. Encourage the design of new buildings or neighbourhoods within green wedge areas and growth corridors to respond to the region's natural landscape features such as waterways and ridgelines.	Partial Support  This direction could be strengthened i.e. 'ensure'.
71. Maximise the opportunity to enhance the sense of place by incorporating the region's waterways into the design of new communities or urban renewal sites in established urban areas.	Support
73. Retain the rural character of land adjoining the UGB and provide buffers from areas of landscape or biodiversity sensitivity.	Support

### **Direction 19: Strengthen the open space network to support community access and connection to nature**

<b>Strategy</b>	<b>Response</b>
74. Facilitate and deliver major new investments in the regional active and passive open space network to respond to increased population and growth.	Support  Funding will be essential to delivery.
75. Support the regional role of Port Phillip Bay, the green wedge areas, waterways	Support

and regional parklands as major open space and recreational assets for liveability, wellbeing and biodiversity.	
76. Extend the local and inter-regional trail network to connect open spaces with activity centres, residential neighbourhoods and the broader active transport network.	Support, subject to comments Funding will be essential to delivery.
77. Ensure urban renewal areas incorporate and provide for open space and recreational opportunities to support the future population in the area.	Support

## **Direction 20: Create a legacy of great public spaces**

- There may be a conflict in the draft Framework Plan between the identification of Ballarat Road as a key east-west corridor that needs protection, and the intent to deliver a boulevard link in this section. This again highlights the importance of investment in public transport, including a tram/rapid transit along Ballarat Road to move more people with less impact.

<b>Strategy</b>	<b>Discussion</b>
78. Identify, enhance and protect existing places and spaces that have high civic or public value, and which contribute to people's understanding, interaction and enjoyment of the region.	Support
79. Identify opportunities for smaller parks and plazas within all activity centres, and the creation of active street spaces that foster outdoor life and a sense of community connection.	Support
80. Enable the creation of new public spaces and active streetscapes within the planning and design of future town centres, such as Toolern Metropolitan Activity Centre.	Support
81. Facilitate the creation of active streets, new urban spaces and urban greening within the redevelopment of urban renewal sites within established urban areas.	Support

**Table: Consideration of the Liveability Actions**

Action	Lead Agency	Response
12. Develop a plan to implement a publicly owned and managed network of regional trails and open spaces across the region's growth corridor, using its natural drainage system where possible to link open spaces, biodiversity areas, waterways and urban areas.	DELWP in implementation partnership with Councils, VPA	Support  Implementation will require significant funding which may be a limitation for councils.
13. Prepare a regional biodiversity strategy to protect, manage and enhance habitat corridors and increase their interconnectivity across urban and rural areas.	DELWP in implementation partnership with Councils	Support  Implementation will require significant funding which may be a limitation for councils.  Expected growth and development highlights that the timing for planning and delivery needs to be considered, including mechanisms for protection and management.
14. Review local planning schemes in the Western Metro Region to ensure protection and enhancement of the landscape and biodiversity values of the region	Councils in implementation partnership with DELWP, Melbourne Water	Support

## 10. Chapter 8: Strong Communities

### State of Play/ Regional strengths/ Regional challenges

- While the draft Framework Plan acknowledges the disadvantage in Melbourne's west and that Brimbank is the second most disadvantaged municipality in metropolitan Melbourne, there isn't a clear connection on how it will address and prioritise investment to address disadvantage.
- Map 8 should include the Brimbank Aquatic and Wellness Centre at 90 Taylor Road, St Albans as a major recreational facility, and the Bowery Theatre in St Albans should also be included.

### Direction 21: Plan for major social infrastructure at a regional level

Strategy	Response
82. Facilitate a regionally coordinated approach to planning for 'whole of life cycle' social infrastructure (excluding schools), within existing communities and the Western Growth Corridor.	Support  Further detail is required to understand the extent of this strategy and implications.  It is not clear why schools are excluded from a strategy that seeks to facilitate a regionally coordinated approach to planning for 'whole of life cycle' social infrastructure.
83. Encourage planning for major social infrastructure (such as libraries, recreation facilities, cultural centres or community hubs) to be undertaken in conjunction with neighbouring regions to maximise co-location of facilities	Support
84. Locate social infrastructure near activity centres to be accessible by walking, cycling or public transport.	Support
85. Support the upgrade and expansion of social infrastructure to enable it to diversify uses and be more flexibly and intensively used, including libraries, recreation facilities and if required and appropriate, schools.	Support
86. Ensure planning for urban renewal areas facilitates access to community uses, particularly the Defence Site Maribyrnong.	Partial Support  There are a number of urban renewal areas and it is not clear why Maribyrnong Defence Site identified and others are not.

87. Support regional planning that will provide for a range of sporting and active recreation facilities to meet the needs of the growing population within existing urban areas and growth areas.	Support
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## **Direction 22: Deliver health and education services in strategic locations**

- The draft Framework Plan highlights that the Sunshine Health, Wellbeing and Education Precinct is well positioned to provide major public services facilities for the growth areas of Melton, Sunbury, Wyndham and beyond to the western region of Victoria. Council also highlights that transport services, particularly including the bus requires upgrades and connections to improve access to the Precinct.

<b>Strategy</b>	<b>Response</b>
88. Strengthen the role of the health and/or education precincts of the Western Metro Region by co-locating new health and/or education facilities within these precincts and encouraging an agglomeration of ancillary uses such as primary healthcare, retail and accommodation.	Support
89. Expand the network of health and/or education facilities and precincts across the region to meet the needs of the growing population. Ensure that these facilities and precincts are accessible by public transport, walking and cycling.	Support
90. Support the upgrade of existing health and education infrastructure to allow for more intensive use of those services.	Support
91. Ensure the early provision of health and education facilities and precincts in the Western Growth Corridor to support the needs of new communities. Locate these facilities or precincts within or near activity centres to maximise the benefits of colocation with ancillary land uses.	Support
92. Provide residential aged care, primary healthcare and remediation facilities in and around health precincts.	Support
93. Support the development of a health and education precinct in Toolern	Support  This shouldn't undermine the role and function of established state significant health and education precincts that serve this region.

**Direction 23: Support a network of activity centres to anchor 20-minute neighbourhoods across the Western Metro Region**

Strategy	Response
94. Plan for existing and new activity centres to embed the 20-minute neighbourhood hallmarks, through a place-based, community partnership approach.	Support
95. Support a consistent designation of neighbourhood activity centres and their role in the network of activity centres across the Western Metro Region.	Support.  Consultation with local government is important given substantial work programs associated with the existing hierarchy in adopted strategy.
96. Embed the 20-minute neighbourhood hallmarks in planning within the catchment of major infrastructure projects.	Support  This should be informed by an initial assessment and consideration of existing constraints to determine whether this strategy is appropriate in every instance.
97. Support the role of neighbourhood activity centres to provide retail, community and allied health services to their respective local catchments.	Support
98. Embed the hallmarks of 20-minute neighbourhoods in planning for new communities within the Western Growth Corridor.	Support

**Table: Consideration of the Strong Communities Actions**

Action	Lead Agency	Response
15. Develop guidance on a new approach to neighbourhood planning in partnership with local councils of the Western Metro Region which embeds the hallmarks of 20-minute neighbourhoods.	DELWP in implementation partnership with Councils, DoT, VPA	Support  Funding submit will be required to deliver improvements in the existing network of neighbourhoods.

# 11. Chapter 9: Sustainability and Resilience

## State of play / Regional strengths / Regional challenges

- Concern is highlighted about the impact of using green wedges for regional energy generation and storage and other like uses that support urban areas such as quarries and transport corridors. The proliferation of these uses can impact some of the key attributes of green wedges including environmental values, agricultural use etc. It also sends a confusing message whereby landowners are restricted in how they use their land, including for urban purposes, while neighbouring land may be used for intense purposes.
- While the siting of some infrastructure is appropriate, there must also be opportunity to use appropriate land within the urban growth boundary also e.g. closed landfills.
- Together with canopy cover, greater emphasis should be put on the importance of retaining water/moisture within the urban realm via water sensitive urban design.
- The draft Framework Plan maintains the western region as a key location for waste and resource recovery facilities in metropolitan Melbourne, however doesn't adequately address the amenity issues, and the legacy issues caused by these activities and the impact on surrounding urban development.
- Stronger direction is required to improve the sustainability of buildings that goes beyond the reliance on the Built Environment Sustainability Scorecard (BESS), which is not aspirational enough for a 30 year plan.

## Direction 24: Increase the number of cool places across the region, particularly for communities vulnerable to urban heat and areas experiencing high urban heat

Strategy	Response
99. Increase tree canopy in areas with high urban heat vulnerability and high urban heat locations.	Support
100. Design and develop outdoor spaces that are cool on hot days through materials, vegetation and water sensitive urban design, particularly in:  Footscray and Sunshine metropolitan activity centres  Melton, Melton-Woodgrove and Coburns Road, Sydenham, Airport West, Caroline Springs, Niddrie-Keilor Road, St Albans, Brimbank Central, Deer Park, Maribyrnong-Highpoint, Braybrook-Central West, Altona North, Tarneit, Manor Lakes, Williams Landing, Werribee, Hoppers Crossing, Werribee Plaza and Point Cook major activity centres.	Support

101.Encourage green roofs and green structures with climate resilient planting and irrigation particularly on apartment developments in areas with high urban heat and large commercial, industrial, education and health developments.	<p>Support</p> <p>Financial support is required as green roofs are often uneconomical in the short to medium term. These also need to consider the impact of climate change and requirements for rainfall.</p>
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**Direction 25: Increase the tree canopy across the Western Metro Region to 20 per cent coverage by 2050.**

Strategy	Response
102.Increase the tree canopy across the Western Metro Region particularly in:  emerging areas in Wyndham and Melton LGAs experiencing high urban heat vulnerability  established areas within Moonee Valley, Maribyrnong and Brimbank LGAs experiencing high urban heat	<p>Support</p>
103.Protect more trees on private land outside of locations identified for higher levels of housing and mixed-use change.	<p>Support</p> <p>Greater statutory powers should be considered and streamlined processes so that it is easier for Council to embed in planning schemes.</p> <p>Alternative urban greening and cooling measures should be required for developments that must remove existing vegetation and tree canopy.</p>
104.Support alternative siting of buildings and more compact building forms to retain mature canopy vegetation	<p>Support</p>
105.Increase tree canopy along urban waterways and on streetscapes, public land, large developments within activity centres, open spaces and road reserves, and large commercial and industrial sites.	<p>Partial Support</p> <p>Funding and statutory mechanisms are required to mandate planting on private land.</p> <p>This strategy should not undermine the integrity of the western region grassland.</p> <p>Tree removal is common practice as part of roadside works and developments led by the state, and also needs to be reconsidered.</p>
106.Use the region's open space network to strengthen its tree canopy and urban greening, aided by water sensitive urban design and stormwater harvesting.	<p>Partial Support</p> <p>Funding support will be required to achieve this strategy.</p>



107.Encourage tree planting as part of the redevelopment of key sites and activity centres and along key pedestrian and active transport links.	Support
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**Direction 26: Manage the impact and risk of sea level rise.**

- Council does not see sea level rise as a concern to the municipality.

Strategy	Response
108.Consider current forecasts of the level of sea level rise and coastal impacts in land use and infrastructure decision-making along the coast.	Support
109.Encourage settlement planning for coastal environments and communities to respond to sea level rise and natural hazard risk.	
110.Limit the location of major land use change in locations with future coastal inundation.	
111.Factor climate impacts into the total life cost of major public land use and infrastructure investment in the coastal areas of the Western Metro Region.	

**Direction 27: Plan for future land use to utilise forecast recycled water from the Western Treatment Plant.**

Strategy	Response
112.Protect and buffer the Western Treatment Plant through appropriate planning zones as a waste-water management hub.	Support
113.Support land use that will enable greater recycled water use from the Western Treatment Plant (to best meet water needs as determined by the Central Sustainable Water Strategy, Melbourne Metropolitan Urban Water System Strategy and Integrated Water Management Forums).	Support
114.Implement integrated water management initiatives that improve water quality, reduce the impacts of stormwater inundation, and protect the region's key watercourse assets.	Support  Funding support will be required to achieve this strategy.

**Direction 28: Increase the retention and reuse of water in the urban environment.**

Strategy	Response
115.Improve regional water outcomes by aligning sub-catchment and local integrated water management planning with opportunities and directions identified at the catchment scale.	Support
116.Facilitate stormwater harvesting close to the source in priority sub-catchments	Support Funding support will be required to achieve this strategy.
117.Facilitate stormwater harvesting at a range of scales throughout the region to achieve co-benefits that respond to urban heat, reduce runoff volume and velocity, service social infrastructure and trees.	Support Funding support will be required to achieve this strategy.
118.Embed integrated water management outcomes in the planning for growth areas and redevelopment within existing urban areas to deliver greater community benefits for liveability, water security and waterway health.	Support. Funding support will be required to achieve this strategy.

**Direction 29: Minimise and reduce risk from bushfire in Wyndham and Melton.**

- Grassfires pose a risk to new and established residential areas and should be similarly minimised and reduced.

Strategy	Response
119.Avoid housing growth and sensitive land uses within and in proximity to bushfire prone areas in the Melton and Wyndham LGAs.	Support
120.Provide new and upgraded regional social infrastructure that provides refuge in extreme bushfire and weather events.	Support
121.Recognise and manage bushfire risk posed by vegetation within waterway corridors.	Support

**Direction 30: Respond to the transformation of the energy supply network**

Strategy	Response
122.Ensure subdivision and greenfield development can support the emerging energy supply network.	Support  Consideration should also be given to electric vehicle infrastructure in the development of new subdivision.

**Direction 31: Protect site of strategic importance for recycling and plan for the expansion of key sites for future resource recovery needs**

Strategy	Response
123.Protect and buffer waste and resource recovery hubs of state importance, including the Brooklyn, Ravenhall and Laverton precincts and the Wyndham Refuse Disposal and Recycling Facility.	Support  Increased guidance and investment is required to address existing amenity impacts.
124.Maintain adequate buffers and provisions to protect the Brooklyn, Ravenhall and Laverton precincts from residential encroachment and incompatible land uses and preserve the importance of the hubs for the long term.	Support  Managing and avoiding land use conflict between industrial and residential uses is an issue in Brimbank. Clear guidance on what adequate buffers and provisions are, including how this would translate in to planning policy is required.
125.Ensure zoning can support complementary land uses to locate in and around the Brooklyn, Ravenhall and Laverton precincts and Wyndham Refuse Disposal and Recycling Facility.	Support, subject to comments.  Opportunities for appropriate, complementary business and economic activities, that support the primary function of the Brooklyn Industrial precinct is appropriate, as long as they support Council's vision that the precinct will be a destination of choice for new, 'clean and green' investment and development.

**Table: Consideration of the Sustainability and Resilience Actions**

Action	Lead Agency	Response
16. Prepare a regional water infrastructure plan in conjunction with Integrated Water Management Forums to support state and local government and relevant agencies to prioritise and align water infrastructure needs and integrated water management outcomes	DELWP in implementation partnership with Councils, Water authorities	Support  Funding support will be required to achieve this action.
17. Investigate options and land use protection for a Resource Recovery Centre and Transfer Station/s to support Melbourne's future resource and recovery needs	Sustainability Victoria in implementation partnership with Councils, EPA	Support
18. Prepare a regional bushfire response for suburban and peri-urban communities that are subject to bushfire risk.	DELWP in implementation partnership with Councils, CFA	Support  This action provides opportunity to consider bushfire risk in Brimbank.
19. Update budget business case submission templates and guidance to identify how initiatives align with Plan Melbourne and the LUFs.	DTF	Support  Budget business cases should also consider the equitable distribution of investment across metropolitan Melbourne informed, as well as need.

## 11.1. Chapter 10: Implementation and Appendices

For completeness, the implementation plan is included below with reference to previous comments.

Key comments included:

- The implementation plan should be accompanied with direction to establish appropriate governance structures to address council involvement and delegation, including allowing for reporting to councils by council officers, particularly where there are financial implications for councils.
- Direction should be included that State Government will formally consult councils about regional plans, including full exhibition and review rights for planning scheme amendments. Council seeks further consultation by the State Government about changes to the Brimbank Planning Scheme to introduce the Western Metro LUFP.
- Regard should be given to the impact on Council resourcing to allow participation in identified projects, and how this will impact Council Plan priorities, which are established through the Council Plan.
- The timeline needs to recognise the range of other strategic work underway that informs these project, and that these projects may take significant time to complete.
- Council resourcing capacity may be constrained by other projects and priorities already committed in four year Council Plans, as well as 10 year capital works plans. Implementation through State government commitment to infrastructure delivery will be crucial. The updated State government business case template is positive however State government will need to go further to fund outcomes of strategic work, and ensure that funding commitments also align with strategic priorities and the final Western Metro LUFP.
- Guidance should be provided on the review cycle of the Western Metro LUFP, and how it will be evaluated.

Table 16 - Five Year Implementation Plan

Action	Timeframe	Lead	Implementation Partners	Response
<p>Implement a program of State Government-led collaborative planning projects to ensure priority metropolitan and major activity centres and urban renewal areas maximise their respective strategic opportunities. Priority will be given to those which deliver significant jobs and housing; leverage investment in state infrastructure; and play an important role in the growth corridor and/or region.</p> <p>State-led planning for these state and regionally- significant places will</p>	Short	VPA	Councils DELWP	Refer to comments in Chapter 2.

contribute to creating liveable communities and achieving more dwellings and jobs in established areas and identify implementation and coordination actions that support growth and economic investment.				
Prepare a report that sets out a spatial framework for employment precincts and activity centres across the Western Growth Corridor. It will consider the future demand for and need for commercial and employment land across the growth areas and ensure that Precinct Structure Plans make adequate and sufficient provision to accommodate longer-term commercial and employment needs.	Short	DELWP	Councils, VPA	Refer to comments in Chapter 4.
Coordinate the whole of government delivery of the Sunshine NEIC to catalyse economic activity and maximise the value of infrastructure investment in the area.	Medium	DOT	Councils, DELWP, VPA	Refer to comments in Chapter 2 & 4.  Given work has already commenced, the timeframe should be changed to short.
Separate to the SERA Pilot Project, identify and implement a SERA in the Western Metro Region in partnership with local government.	Medium	DJPR	Councils, DELWP	Refer to comments in Chapter 9 regarding waste and resource recovery and SERA.
Update planning schemes to align with housing policies in Plan Melbourne and the Western Metro Region Land Use Framework Plan and the implementation of the reformed residential zones.  This includes:  Providing capacity for 15 years of regional housing supply focussing on locations identified for housing growth in the LUFP  Reviewing planning controls in Housing Investigation Areas as	Short	Councils	DELWP	Refer to comments in Chapter 5 & 6 in relation to housing.

<p>potential locations for substantial housing change.</p> <p>This may require strategic planning work to support these changes such as preparing or updating local housing strategies or preparing structure plans to further investigate where increased densities can be supported, and determine specific changes required to planning schemes.</p>				
Identify underutilised and surplus government land that has potential to deliver additional social housing.	Short	DFFH (HV)	Councils	Refer to comments in Chapter 5 in relation to housing.
In partnership with councils, identify a pipeline of sites in the Western Metro Region for social and affordable housing.	Medium	DFFH (HV)	DELWP	Refer to comments in Chapter 5 in relation to housing.
Develop a model and seek support for a whole-of-government approach to better sequence and prioritise locations for key services, social infrastructure and public transport access in the development of growth areas to better enable walkable 20-minute neighbourhoods.	Short	VPA	Councils, DELWP, DET, DFFH (HV), DH, DOT	Refer to comments in Chapter 4, 5, 6 & 8 in relation to productivity actions.
Investigate barriers and opportunities to increase public and active transport mode share across the region to support culture change, spread demand on transport infrastructure, reduce greenhouse gas emissions and support 20-minute neighbourhood outcomes. Identify trial locations in the region to focus the investigation.	Medium	DOT	Councils	Refer to comments in Chapter Integrated 6, 7 & 8.
Undertake a review of the regional bus network to support regional access and movement in the short to medium terms and to plan integration with major public transport changes including Suburban Rail Loop Melbourne Airport Rail and future bus networks in the growth areas and bus infrastructure for late night travel options	Short	DOT	Councils	Refer to comments in Chapter Integrated 8.

Review the Principal Public Transport Network for the growth areas	Short	DOT	Councils, DELWP	Refer to comments in Chapter Integrated 8.
Develop a plan to implement a publicly owned and managed network of regional trails and open spaces across the region's growth corridor, using its natural drainage system where possible to link open spaces, biodiversity areas, waterways and urban areas.	Short	DELWP	Councils, VPA	Refer to comments in Chapter 7.
Prepare a regional biodiversity strategy to protect, manage and enhance habitat corridors and increase their interconnectivity across urban and rural areas.	Medium	DELWP	Councils	Refer to comments in Chapter 7.
Review local planning schemes in the Western Metro Region to ensure protection and enhancement of the landscape and biodiversity values of the region.	Medium	Councils	DELWP, Councils	Refer to comments in Chapter 7.
Develop guidance on a new approach to neighbourhood planning in partnership with local councils of the Western Metro Region which embeds the hallmarks of 20-minute neighbourhoods.	Short	DELWP	Councils, DoT, VPA	Refer to comments in Chapter 8.
Prepare a regional water infrastructure plan in conjunction with Integrated Water Management Forums to support state and local government and relevant agencies to prioritise and align water infrastructure needs and integrated water management outcomes	Medium	DELWP	Councils, Water authorities	Refer to comments in Chapter 9.
Investigate options and land use protection for a Resource Recovery Centre and Transfer Station/s to support Melbourne's future resource and recovery needs.	Medium	Sustainability Victoria	Councils, Environment Protection Authority	Refer to comments in Chapter 9.
Prepare a regional bushfire response for suburban and peri-urban communities that are subject to bushfire risk.	Medium	DELWP	Councils, Country Fire Authority	Refer to comments in Chapter 9.



Update budget business case submission templates and guidance to identify how initiatives align with Plan Melbourne and the LUFPs.	Short	DTF		
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## **Brimbank City Council**

**Telephone** 9249 4000

**Email** [info@brimbank.vic.gov.au](mailto:info@brimbank.vic.gov.au)

**Post** PO Box 70, Sunshine, VIC 3020

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