

Maribyrnong City Council

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Dean Lesser
A/g Director Engagement
Cities and Suburbs Unit
GPO Box 594
CANBERRA ACT 2601

Dear Mr. Lesser,

Feedback on Draft National Urban Policy

Thank you for the opportunity to provide feedback on the Federal Government draft National Urban Policy. The purpose of this letter is to provide a submission on behalf of Maribyrnong City Council. Due to the tight consultation timeframes, the response below has been prepared by Council Officers.

We welcome the opportunity to provide input on such an important overarching document that will set goals and objectives to enable our urban areas to be liveable, equitable, productive, sustainable and resilient for future generations. Our response has been prepared having regard to the Maribyrnong Council Plan 2021-2025 and a range of other Council endorsed strategies that were developed in consultation with the Maribyrnong community. The submission continues to advocate for action on a number of key planning issues related to the City of Maribyrnong and whole of Australia including:

- Supporting housing growth when delivered alongside necessary improvements and upgrades of local services and infrastructure
- Activation and support for our local commercial centres and employment precincts
- Promotion of active transport including walking and cycling
- Ensuring retention of employment generating uses alongside initiatives that will transition the local economy towards clean energy, technology, research and creativity
- Investing in programs that will address the skills shortage and attract and retain talent in Australia
- Declaring a climate emergency and funding state and local Governments to address climate change risk and build resilience for future environmental disasters
- Committing to addressing the health impact of air pollution by funding a rapid shift to more fuel efficient heavy vehicles including incentivising the electrification of the light vehicle fleet
- Working in partnership with state governments to transition the diesel passenger and freight train network to electro-diesel
- Investigating expansion of the Avalon Airport as an alternative to Melbourne Airport to protect the amenity of residents affected by expansion of routes on existing flight paths
- Investigating high speed rail between major population centres as an alternative to air travel.

Please see the following pages for more detail on the above priority areas. Should you require further clarification or information, please do contact me at Ashley.Minniti@maribyrnong.vic.gov.au or (03) 9688 0347.

Regards,


Mr Ashley Minniti
Acting Director Planning and Environment Services

About Maribyrnong City Council

Maribyrnong City Council is a 31.21 square km municipality located in Melbourne's inner-western suburbs, between 5 and 11 kilometres west of the Melbourne CBD. Maribyrnong acts as a gateway between the western growth corridor and the central city, with the confluence of the Yarra and the Maribyrnong Rivers forming the eastern and northern boundaries of the municipality.

The City of Maribyrnong contains a mix of residential, commercial, industrial and educational land uses. The City's identity as a centre for industry in Victoria stretches back to the 1840s when the first industrial establishment opened on the Maribyrnong River.

We know our City is already a great place to live, and we support the Federal Government's initiative to work with Local, State and Territory Governments to ensure that our City continues to be a vibrant place to live, work, and grow.

The draft National Urban Policy is based on strong urban planning principles, and we commend the ambitious scope of the strategy. These actions must be accompanied by an Implementation Plan and Governance Structure, to ensure that actions are measurable and achievable. This will ensure the Policy is transparent and regularly reviewed.

Good planning of Australian cities would benefit from the Australian Government delivering more local funding for community informed projects, and supporting innovation through sharing national research and information about cities.

Our submission has been organised around the headings of Liveability, Equity, Productivity, Sustainability and Resilience within the draft National Urban Policy. The draft would benefit from strengthening the actions and objectives across several key areas of interest to the City of Maribyrnong:

1. Liveability

Key issues facing the City of Maribyrnong:

- Activation and support for our local commercial centres and employment precincts
- Promotion of active transport
- Health impacts of increased pollution and car dependency

The Policy makes several references to updating land use planning systems to accommodate a greater mix of housing and higher-density housing in well-located areas, close to transport connections, amenities, services, and education and employment opportunities.

The City of Maribyrnong is well located and achieves all of these locational objectives. However, in areas of Maribyrnong, such as the Footscray Metropolitan Activity Centre, residential and commercial permits are not being acted on. It continues to be Council's experience that while planning permits are issued some major developments are yet to be realised. Several large scale projects have not commenced, with sites remaining derelict and idle for many years. Planning permits have been issued for approximately 3,200 new dwellings in Maribyrnong that have not yet been constructed. Of these, over 1,300 new dwellings have been delayed by at least 3 years.

Local Councils approve a large number of Planning Permit applications, but do not have the authority to force landowners to commence development of these sites. To address this, a National Urban Plan must include an action to investigate why there is underutilised land and land banking in areas for housing growth and how this can be addressed.

With the population of the City of Maribyrnong expected to increase by 66% by 2041. The planning for the future of the former Defence Site Maribyrnong is deemed critical to the provision of housing and services to manage this growth. Council is keen to understand the future investment, infrastructure and service needs for the site and surrounds, to assist with its own planning. A National Urban Plan should include actions to

work in partnership with Maribyrnong City Council to begin planning and development of the Maribyrnong Defence site.

The draft policy contains general messaging about the importance of inclusivity and safety in public spaces, and the need to ensure that development of our cities is actively improving our living environments as Australia grows. This is commendable and the basis of good urban planning principles.

Council is also supportive of the development of a nationally consistent framework that establishes standards for infrastructure and services. However, we suggest that this should be expanded from a focus on growth areas to include upgrading of aging infrastructure within existing suburbs.

Actions to ensure equity of access to housing and services in existing suburbs as areas experience infill growth would benefit from a stronger national position for consideration of space for the development and integration of community initiatives beyond the private realm.

A focus on tangible actions that are supported by a robust Governance structure and review process is needed to achieve a coordinated approach to improving our cities. This should include coordinated approaches that include greening spaces, providing sightlines and pedestrian friendly lighting to support a welcoming and active public realm.

A National Urban Policy should include strategies and actions to:

- Commit to support and provide funding for State and Local Governments to develop strategies to require developments to undertake a coordinated approaches to public realm improvements that contribute to a sense of place.
- Commit to provide funding to support State and Local Governments to upgrade existing infrastructure and services to support additional housing growth.

2. Equity

Key issues facing the City of Maribyrnong:

- Inclusive and accessible services delivered at a local level
- Supporting housing growth when delivered alongside necessary improvements to services and infrastructure
- Ensuring retention of employment generating uses

Council agrees with the key urban challenges identified at page 34 to address housing quality, active transport and social infrastructure. Maribyrnong Council's key objectives within the 2021-2025 Council Plan include providing well-planned neighbourhoods and a strong local economy, delivering services that are inclusive and accessible to the whole community and that support wellbeing, healthy and safe living, connection to the community, and cultural interaction. Council also seeks to promote and protect the health and wellbeing of our community across all life stages.

Exploring and adopting emerging technologies is commendable, and Council is supportive of investment in innovative solutions. However, as recently as 2016, 4,233 households in the City of Maribyrnong (12.9%) did not have an internet connection at the dwelling. While digital connectivity is fundamental for modern cities, it is important to acknowledge that this creates a risk of exclusion for lower-income households and presents a barrier to community engagement.

Youth mental health services in the inner western suburbs of Melbourne are in crisis with young people (aged 12 – 25 years) waiting 3-6 months for an appointment. The risk for these young people is poorer mental health outcomes often associated with experiences of exclusion, discrimination and stigma, and barriers to accessing services. In Maribyrnong, which has one of the largest multi-cultural communities in Victoria, there are significantly more young people than the State average vulnerable to these experiences, through their cultural or gender identity, language barriers, instability at home due to financial or migration reasons, or even homelessness.

Prevention and early intervention youth mental health is a key priority for Maribyrnong City Council. We must ensure young people have localised access to a mental health service during times of crisis and need.

A National Urban Policy should include strategies and actions to:

- Establish and provide ongoing funding for a mental health service in Melbourne's inner west. Support the State Government to implement community-based solutions, as recommended by the Royal Commission into Victoria's Mental Health System.
- Increased investment in community-led and youth-based mental health prevention and early intervention responses.
- Increase sustained investment to reduce wait times for services.
- Undertake a review and establish a plan to address the mental health impact of housing affordability, climate change and the long term impacts of COVID-19 for our young people.

3. Productivity

Key issues facing the City of Maribyrnong:

- Retaining and encouraging employment and industrial land to support job growth.
- Impact of Major Hazard Facilities.
- Acknowledgement of the important role the Footscray Metropolitan Activity Centre plays in the future and function of inner Melbourne.

Council strongly supports the identification of productivity challenges at page 36 of the draft Policy about the digital connectivity, labour mobility and income inequality.

Melbourne's inner west represents a major residential, business, industrial and cultural hub for Melbourne. Located near important infrastructure, transport links, the Port of Melbourne and Melbourne's CBD, the inner west is crucial to Victoria's economic development and its social, environmental and cultural fabric.

State Significant Industrial Land and local commercial/industrial precincts continue to play an important role in the local economy, providing opportunities for new employment and job growth. If not protected, employment land can transition to residential land uses and it is then unlikely to be available to provide jobs for local communities now or in the future and people will need to travel further to work. Challenges and opportunities will be created across numerous sectors of the economy, particularly manufacturing and industry in the inner west with its proximity to the Port of Melbourne.

The Western Interstate Freight Terminal (WIFT) is an integral part of Plan Melbourne and intrinsically linked to the Port of Melbourne. A number of shipping container parks are located in West Footscray, Tottenham and Brooklyn, with significant freight traffic carrying interstate goods moving through inner parts of the Western Region. Most of this traffic passes through our City's collector and arterial roads, including residential areas, causing not only congestion but environmental, health and amenity impact on our residents and small businesses.

Council acknowledges that there are conflicts between urban freight, major hazard risks and land use planning raised. The Maribyrnong Council area has included both residential and industrial uses since the mid 1800's. While housing uses across the city have increased, so has the number and frequency of freight transport including heavy polluting diesel vehicles.

The Objective of Clause 13.07-2S (Major hazard facilities) of all Victorian Planning Schemes is 'to minimise the potential for human and property exposure to risk from incidents that may occur at a major hazard facility and to ensure the ongoing viability of major hazard facilities'. Strategies identified to achieve this objective are high level and rely on applying 'appropriate threshold distances from sensitive land uses for new major hazard facilities and between major hazard facilities'. In the absence of further direction, decisions rely on 'inner safety area' and 'outer safety area' buffer zones identified by WorkSafe in 2022. This is further

exacerbated when a federally operated facility is not managed by WorkSafe and safety information is not made readily accessible to Council decision makers.

Inconsistent and convoluted advice from various government agencies in relation to development within Major Hazard buffer zones has resulted in risk-adverse decision making by Local Councils. These decisions have frequently been overturned when challenged at the Victorian Civil and Administrative Tribunal due to insufficient supporting data from regulating authorities.

To ensure the ongoing safety of residents and workers within areas containing Major Hazard Facilities, the Federal Plan must include direction for both establishing buffer distances and guidance for assessing and balancing this risk. It is vital that a policy seeking to implement good planning principles provides guidance for balancing these significant land use conflicts. The possible actions listed on page 38 include collaboration but do not propose any solutions to resolve these conflicts between important land uses.

A National Urban Policy should include strategies and actions to:

- Work in partnership with Maribyrnong City Council to implement initiatives that will transition the local economy towards clean energy, technology, research and creativity.
- Ensure buffer distances for all Major Hazard Facilities are applied consistently and transparently.
- Provide grants and funding to support the transition of industry to higher density jobs including advanced manufacturing, agrifood, energy and technology.
- Introduce programs that will address the skills shortage and attract and retain talent in Australia.

4. Sustainability

Key issues facing the local Maribyrnong City Council area:

- Climate change and environmental disasters including increased urban heat and major flooding events.
- Health impact of air pollution linked both to the City's industrial past and continued reliance on manufacturing and processing plants, along with tonnes of diesel and petrol pollutants from cars, trucks and trains.
- Need for new open space areas to support increased residential densities.

Council welcomes the commitment of the Federal Government to considering and addressing the relationship between urban development patterns and environmental impacts including disaster and climate risk, urban heat island effect, high material footprint and greater infrastructure investment needs.

As stated at page 29 of the draft Policy, extreme weather events impact the safety of people both at home and in the community, with issues like urban heat and lack of shade particularly impacting movement and safety.

The Urban Heat Island effect, whereby heat is retained in the hard surfaces of an urban landscape and reradiated out at night, is particularly problematic in the inner areas of Melbourne and exacerbates extreme heat events, which has serious human health impacts.

Maribyrnong is already experiencing the impacts of climate change - extreme weather events, heat waves, food insecurity, river flooding and energy poverty. We are working with our community directly, in particular those profoundly impacted by the October 2022 flood event along the Maribyrnong River.

It is vital that all levels of Government work in partnership to bring about the necessary change to mitigate and adapt to these impacts. Maribyrnong Council supports improving environmentally sustainable design through the planning system and is eager to see all levels of Government supporting a coordinated approach to addressing climate change.

A National Urban Policy should include strategies and actions to:

- Declare and adopt a climate emergency response.
- Initiate policies including mandatory targets that reduce carbon emissions and diesel particulates to address climate change.

5. Resilience

Key issues facing the City of Maribyrnong:

- Lack of affordable housing resulting in traditional blue collar industries and residents with lower incomes relocating further out of Melbourne.
- Increases to housing supply without corresponding support from levels of Government to deliver the necessary infrastructure and services.
- Significant redevelopment sites sitting idle and often vacant for many years.

According to the Social Health Atlas of Australia, published by Torrens University in 2019, the City of Maribyrnong has some of Victoria's worst health statistics. Maribyrnong has the worst cardiorespiratory outcomes across all metrics, even though it has the youngest demographic and the lowest smoking and adult obesity rates in the inner west. This suggests that air pollution could be an important contributory factor. The air quality issue is linked both to the City's industrial past and continued reliance on manufacturing and processing plants, along with tonnes of diesel and petrol pollutants from cars, trucks and trains. Particularly of concern is the significant numbers of trucks passing through the municipality daily, in part due to the proximity to the Port of Melbourne and Westgate Bridge.

The draft Policy frames the conflict between freight and land use planning as a challenge due to potential affects to the efficiency and viability of freight networks (page 36). At page 37 the Policy goes on to state that 'congestion and land-use conflicts between freight operations and residential development can increase costs and hinder the smooth movement of goods'.

This approach conflicts with Objective 5: Our urban environments and communities promote health and wellbeing, which seeks to support healthy urban areas. Many areas of Maribyrnong that have been accommodating residential uses since the mid-1800s are disproportionately impacted by poor air quality from freight routes experiencing significant growth alongside increased use of diesel and petrol pollutants.

World Health Organisation guidelines provide a clear indication of the damage to human health caused by air pollution. Air quality monitoring, carried out in Yarraville by the Queensland University of Technology International Laboratory for Air Quality and Health in 2020, recorded levels of PM2.5 that were three times higher than the annual WHO objective guidelines. Residents of the City of Maribyrnong are currently exposed to consistently poor air quality levels compared to other suburban areas of Melbourne. More bushfires will also increase the impact of poor air quality on our community. Hospital admission rates for respiratory ailments in Maribyrnong's young are 70% above the Victorian average and 171% above the Australian average.

Council is broadly supportive of objectives to protect land around ports, airports and freight terminals to avoid conflicts and support efficient logistics. However, we have significant concerns that drafting of these actions overwhelmingly prioritises development of logistics and freight movement to the detriment of existing residential amenity and well-being.

The expansion of Melbourne Airport would result in associated new pollution and noise impacts on affected residents in Maribyrnong, where houses have existed since before the airport expansion plans. As development in the west of Melbourne continues to occur, Avalon Airport has much lower population densities surrounding it and should be considered as an alternative to support increased air travel capacity needs.

Council also encourages the Commonwealth Government to properly invest in high speed rail, which produces significantly less carbon emissions than air travel. The Sydney to Melbourne air route is one of the busiest in the world and would be ideally suited to high speed rail, while also linking with major regional centres.

A nationwide policy seeking to ensure cities are developed as safe, healthy, vibrant places to live, work, and grow must address this conflict in an actionable way. Robust actions to address these issue facing communities with a disproportionate impact on aging infrastructure and wellbeing of existing communities and lower socioeconomic areas.

A National Urban Policy should include strategies and actions to:

- Initiate a heavy vehicle buy-back scheme and incentivise more fuel efficient heavy vehicles.
- Commit to a rapid shift from diesel and petrol to electric vehicles by promoting, funding and incentivising the electrification of the light vehicle fleet.
- Work in partnership with state governments to transition the diesel passenger and freight train network to electro-diesel.
- Introduce a ban on all diesel and petrol vehicle sales by 2030.
- Introduce mandatory vehicle emission standards.
- Commit to investigate expansion of the Avalon Airport as an alternative to Melbourne Airport to protect the amenity of existing affected residents.
- Commit to introducing legislation to define and protect a future high speed rail route along the eastern seaboard as an alternative to air travel.

Once again, we commend the Government on the ambitious scope of the draft policy. We strongly recommend that the policy would benefit from development of an Implementation Plan and Governance Structure. This would ensure that National Urban Policy can deliver good planning outcomes through actions that are transparent, measurable and achievable.