

31 March 2025

Victorian Planning Authority
35 Collins Street
Melbourne Victoria 3000

Via e-mail: meltoneast@vpa.vic.gov.au

To whom it may concern,

Re: Melton East Precinct Structure Plan - Exhibition

The Council Alliance for a Sustainable Built Environment (CASBE) welcomes the opportunity to respond to exhibition of the Melton East Precinct Structure Plan (PSP).

BACKGROUND

CASBE is an association of Victorian councils committed to ensuring future generations can enjoy a sustainable built environment, by seeking sustainable design outcomes through the statutory planning / development application approvals process. CASBE member councils cover 89% of Victoria's population. You can find a complete list of our 44 members on our website. ¹ CASBE is auspiced by the Municipal Association of Victoria (MAV).

CASBE's vision is: *Metro cities, regional cities and towns are sustainable, thriving, and operate in harmony with social and ecological systems.*

CASBE provides a forum for the exchange of information, and ideas on innovation and best practice in Environmentally Sustainable Development (ESD). Our local, ground-up approach has resulted in collaborative local government led action, broad scale positive change to Victoria's built environment, and a significant reduction to its consequent environmental impacts.

Local ESD Policy

A key aspect of CASBE's work has been to facilitate the introduction of local planning policy that requires ESD design strategies to be considered by the community when undertaking development projects. There are now 27 Victorian Councils ² with this local ESD policy for buildings, and even more utilising the methodology and purpose-built tools aimed at delivering ESD outcomes through the planning system.

¹ <https://www.casbe.org.au/who-we-are/membership/>

² <https://www.casbe.org.au/what-we-do/state-local-planning-policy/>

Built Environment Sustainability Scorecard (BESS)

CASBE has developed the *Built Environment Sustainability Scorecard (BESS)*³ - an online tool for assessing the sustainability of development proposals at planning stage. BESS provides a consistent assessment methodology for CASBE's *Sustainable Design Assessment in the Planning Process (SDAPP)* Framework – an approach adopted by 36 Victorian councils subscribing to BESS.

BESS was designed to help applicants and councils meet the ESD local policies which go some way towards climate resilient building through energy efficiency and other sustainable design measures.

Sustainable Subdivisions Framework

The Sustainable Subdivisions Framework (SSF) was developed as a state-wide replicable model through a collaboration of regional and growth area councils with a focus on greenfield subdivisions. The SSF seeks to mitigate the impacts of future climate projection scenarios, creating sustainable and liveable subdivisions that can adapt to the changing climate.

In 2023-2024, a comprehensive review of the SSF was undertaken through the *Sustainable Subdivisions Framework – Next Steps Project*, and a SSF Version 2 (V2) has been developed. CASBE is now working to digitise the SSF V2 via a new module in the BESS tool – BESS Subdivisions.

Precincts collaboration

The Melton East PSP, and others to follow, perfectly progresses council leadership in planning policy from the local ESD policies for buildings and the SSF for subdivisions. The Melton East PSP is the logical next step for cross collaboration on stronger ESD planning policy.

³ <https://www.bess.net.au/>

MELTON EAST PRECINCT STRUCTURE PLAN

CASBE congratulates the City of Melton for its ambition and early leading practice research into precinct scale sustainability outcomes to inform a climate resilient precinct.

CASBE is pleased to provide the following commentary regarding the alignment of the SSF with the proposed PSP.

A VISION WITH PURPOSE AND PLACE

CASBE supports the reference to a sustainability-focused precinct in the vision for the Melton East PSP.

CASBE suggests that commentary on climate risks and resilience could be considered in the vision. See below some sample dot points from the [Melton East PSP Vision & Purpose](#) (August 2022):

- *...best-practice urban design principles in natural settings will provide innovative opportunities for a green, **climate resilient precinct** with a strong sense of place.*
- ***The precinct will be designed to accommodate future climate risks with flexibility to implement emerging technologies.***

Recommendation:

- **That the vision also considers referencing resilient community design to consider future climate risks.**

IMPLEMENTATION

CASBE supports the Melton East Precinct Structure Plan, designed in accordance with the Precinct Structure Plan Guidelines, which align with the Sustainable Development Goals and the 20-minute neighbourhood concept. CASBE also supports the recommended features outlined in the PSP Guidelines.

Finding the right location for ESD in PSPs

ESD assessment is the holistic assessment of sustainability. CASBE is the owner of two holistic assessment tools – BESS for buildings scale, and the SSF for subdivision scale development. Precinct scale ‘scales up’ subdivision scale development and also includes buildings within Activity Centres in new precincts.

In general, we are suggesting the following approach with regard to the inclusion of sustainability strategies in the PSP:

- VIABLE DENSITIES – ESD and climate resilient housing
- SAFE, ACCESSIBLE & WELL CONNECTED - Transport network

- CONNECT PEOPLE TO JOBS & HIGHER ORDER SERVICES – No comments
- OFFER HIGH-QUALITY PUBLIC REALM – Precinct scale climate resilience
- SERVICES AND DESTINATIONS – No comments
- THRIVING LOCAL ECONOMIES – Non-residential ESD
- INFRASTRUCTURE COORDINATION – Sustainable infrastructure and renewable energy solutions at the precinct scale

Evidence based approach - Melton East PSP – Climate Resilience Assessment – Implementation Plan

CASBE commends the VPA for their leadership in commissioning the *Melton East PSP – Climate Resilience Assessment – Implementation Plan* (Hip V Hype, July 2023) and supports its implementation in the PSP.

CASBE recognises the challenge of translating some lot scale outcomes to the precinct scale, however, notes that there are a number of recommendations from the report which are not in the exhibited PSP which could improve the sustainability and climate resilience of the precinct.

VIABLE DENSITIES

A climate resilient approach to housing design is one which considers the likely extreme weather events for that area and responds accordingly. We think this is critical in planning for a safe climate. For example, housing should be designed to respond to:

- Increased heatwaves – the building is designed to be thermally comfortable during heat waves and in the event of a power outage. Assessment by the NatHERs Whole of Home Assessment tool would be a design measure to mitigate this risk.
- Power outage – the building is designed to remain functional during a heatwave with a power outage. This may include having the capacity to switch to the use of renewable resilient (eg off grid) power supplies. A lot-scale battery storage system would be a design measure to mitigate this risk.
- More extreme storm events – the building is designed to structurally withstand more extreme storm events. *(not a design measure suitable for consideration at planning)*
- Coastal storm surge – buildings are structurally designed to withstand coastal storm surge *(not a design measure suitable for consideration at planning)* or are prevented from building in at-risk areas. *(addressed in high settlement planning)*
- Drying and warming trend for Victoria – our buildings are able to capture and store rain water. As our climate dries, water security will become increasingly important. Requiring lot scale rainwater tanks (which contribute to water security and management of flow during heavy rain events) would be a design measure to mitigate this risk.

CASBE recommends that the following objectives, requirements and guidelines are included to deliver climate resilient housing:

- **New Objective:** To promote and facilitate environmentally sustainable and climate resilient housing. Under IMPLEMENTATION TOOLS link to the following new requirement/guideline.
- **New Requirement/Guideline** which links to application requirements for ESD in the Urban Growth Zone Schedule: All residential development to demonstrate best-practice environmentally sustainable design / performance at the subdivision planning permit stage, to the satisfaction of the Responsibility Authority, including (as identified in the Melton East PSP – Climate Resilience Assessment –Implementation Plan:
 - The inclusion of pre-wiring to support future EV charging.
 - Residential dwelling designs should include a solar PV system of:
 - At least 7.5 kWp for each single dwelling.
 - At least 4.5 kWp for each town house All other buildings should include solar PV provision to 75% of unencumbered roof space
 - The use of light coloured roofs, with materials used meeting a minimum Solar Reflective Index (SRI) of 50 or greater.
 - Meeting maximum cooling load requirements (30MJ/ m2), consistent with the Better Apartment Design Standard.
- Consider a variation to increase the permeability requirement in the Small Lot Housing Code to 20% (to encourage two-storey dwellings of modest scale).
- Consistent with the Victorian Gas Connection Ban, residential areas must not provide mains gas connection.
- Include on-lot requirements in residential design guidelines.

SAFE, ACCESSIBLE & WELL CONNECTED

CASBE supports integrated land use transport throughout the PSP including key recommendations of the Melton East PSP – Climate Resilience Assessment –Implementation Plan to connect to major local destinations beyond the PSP boundaries.

CASBE recommends that these initiatives, including the following, are integrated into the PSP:

- **Dedicated, safe and connected active transport to major destinations outside the precinct** including Melton Town Centre in the west, Woodlea Activity Centre in the east, Toolern Employment precinct, Rockbank Train Station and Cobblebank Station must be provided.

CONNECT PEOPLE TO JOBS & HIGHER ORDER SERVICES

No specific comments.

OFFER HIGH-QUALITY PUBLIC REALM

CLIMATE RESILIENT COMMUNITIES

CASBE supports the [Melton East PSP – Climate Resilience Assessment –Implementation Plan](#) (July 2023) prepared to inform climate resilience responses for the precinct in accordance with the Climate resilient communities guidance in the PSP Guidelines.

While Integrated Water Management, a key resilience strategy, is well integrated throughout the PSP, many of the recommendations in this Climate Resilience Assessment are not included in the exhibited PSP.

CASBE notes that the Planning and Environment Act 1987 was amended on 26 March 2025 to require climate change considerations for planning scheme amendment. While the transitional provisions exempt amendments which have been exhibited, CASBE supports the implementation of the Climate Resilience Assessment for Melton East to plan for a safe climate.

CASBE supports O20 *To create a sustainable urban landscape that encourages climate change adaptation, enhances existing biodiversity and landscape values within the precinct* and the associated landscaping and canopy cover requirements to achieve the objective (R22-24). CASBE is of the view that the proposed Requirements will enable development to meet the objective O22.

CASBE supports O23 *To improve resilience of the built environment to climate change related hazards and natural disasters*. However, note that the requirements and guidelines (R22-24, R35 and G15-17) are largely limited to landscape to reduce urban heat and improve biodiversity. While these are important inclusions, CASBE supports the following additional matters to be included as requirements or guidelines, linked to O23:

To improve climate resilience, CASBE recommends implementation of recommendations in the [Melton East PSP – Climate Resilience Assessment – Implementation Plan](#), including:

- **Support sustainable travel through the provision of cool routes / shadeways between key local destinations (>70% canopy cover)**
- **Essential retail and fuel / EV charging facilities must be located on connector or arterial roads for community access during extreme weather events.**
- **Critical healthcare, essential retail and community centres should be designed with electricity back-up available during outages batteries (with off-grid capability - islanding) and mobile or fixed diesel generators for critical health care, retail and community services.**

- At least one community centre / public access buildings (e.g. libraries) should be provided with refuge capability (shelter, air conditioning, entertainment, device recharge, improved thermal performance).
- Activity areas within recreation reserves should be designed to provide summer shading (e.g. canopy vegetation or shade structures).
- Major roads should include appropriate vegetation to stabilise verges, battering and scour-prevention measures.
- Street sections should consider slopes for at-risk major roads (e.g. either sides of bridges) or connectors that dip into inundation zones.
- Species susceptible to higher winds should be avoided, especially on elevated areas in the west of the precinct, where trees should be planted in copses where possible.
- Bridges across overland flow paths should be designed to account for sensitivity analysis in hydraulic and hydrological modelling to RCP 8.5 @ 2070, prioritising their provision for arterial roads first and for connector roads as a secondary priority.
- Larger underground stormwater pipes should be considered to ensure capacity for the potential of a 50% or more increase in rainfall intensity.
- Telecommunications towers should be located on higher land where flooding issues are unlikely to cause interruptions, with larger buildings in activity centres designated for temporary infrastructure to support telecommunications during extreme events (i.e. specified with a portion of flat rooftop to support temporary towers).

SERVICES AND DESTINATIONS

No specific comments.

THRIVING LOCAL ECONOMIES

The recommended features outlined in the Thriving Local Economies section of the PSP Guidelines align with the Circular Economy category.

CASBE supports objective O26: *To deliver activity centres that accommodate a range of jobs, services, amenities, activities, and housing that supports a full range of employment opportunities and meet the changing economic, **climate** and social needs of a place to support a diverse sustainable economy.* However, the IMPLEMENTATION TOOLS (R57, R58, G41 Table 20) are insufficient to deliver climate responsive design in activity centres.

CASBE supports *Table 27 - Activity centre design principles* which outlines the following design outcomes for climate resilience:

- *The design of the Neighbourhood Activity Centre should integrate climate resilience design outcomes as outlined within the Melton East PSP Climate Resilience Assessment Implementation Plan (HipVHype July 2023).*

However, to ensure that they are adequately considered and given sufficient statutory weight, CASBE recommends that these climate resilience design outcomes are integrated into the PSP itself through requirements or guidelines, linked to O26. Specifically:

- Commercial / non-residential development to demonstrate best-practice environmental sustainable design.
- Provision for Electric vehicle at activity centres and service stations.
- Town centre designs should include:
 - Awnings for weather protection in commercial streets
 - Protection for public transport users at all stops
 - Thermal performance benchmarks for public and education buildings
 - Shade and extreme weather protection as key design attributes of civic spaces
 - A 30% tree canopy target (including in major hardstand areas such as carparks and plazas) (we note that the Melton East PSP – Climate Resilience Assessment – Implementation Plan identified a 40% target however acknowledge the approach taken i.e. 30% target)
 - An appropriate Green Star or equivalent BESS rating

CASBE recommends the following requirements and guidelines linked to O26 and O27:

- **New requirement: All commercial / non-residential development to demonstrate best-practice environmentally sustainable design / performance at buildings and works planning permit stage via the use of a recognised rating tool (i.e. Greenstar Buildings, BESS, or similar) to the satisfaction of the Responsible Authority.**
- **New requirement: All neighbourhood-level activity centres and service stations within the precinct must be designed to accommodate flexible uses and provide EV charging infrastructure.**
- **New guidelines: Town centre designs should include:**
 - Awnings for weather protection in commercial streets
 - Protection for public transport users at all stops
 - Thermal performance benchmarks for public and education buildings
 - Shade and extreme weather protection as key design attributes of civic spaces
 - A 30% tree canopy target (including in major hardstand areas such as carparks and plazas) (we note that the Melton East PSP – Climate Resilience Assessment – Implementation Plan identified a 40% target however acknowledge the approach taken i.e. 30% target)
 - An appropriate Green Star or equivalent BESS rating

CASBE recommends the following requirements and guidelines linked to O28:

- **New requirement: All industrial development to demonstrate best-practice environmentally sustainable design / performance at buildings and works planning permit stage via the use of a recognised rating tool (i.e. Greenstar Buildings, BESS, or similar) to the satisfaction of the Responsible Authority.**

Urban Growth Zone Schedule

CASBE supports the inclusion of Environmentally Sustainable Development (ESD) requirements in the Urban Growth Zone schedule. We are of the view that the application of the ESD Policy will contribute to objectives O26, O27 and O28 and should therefore have a corresponding requirement or guidelines that links to the zone requirements.

To improve climate resilience, CASBE recommends implementation of recommendations in the [Melton East PSP – Climate Resilience Assessment – Implementation Plan](#), including:

- Provide spatial allocation for local repair cafés (not only facilitate a step-change towards the circular economy, they also provide spaces for social interactions, knowledge sharing and skill building within the community across diverse groups).

INFRASTRUCTURE COORDINATION

Environmentally sustainable design and sustainable energy

CASBE is of the view that environmentally sustainable design and climate resilience should be addressed in multiple sections of the PSP depending on the focus area. CASBE suggests addressing as follows:

- VIABLE DENSITIES – ESD and climate resilient housing
- OFFER HIGH-QUALITY PUBLIC REALM – Precinct scale climate resilience
- THRIVING LOCAL ECONOMIES – Non-residential ESD
- INFRASTRUCTURE COORDINATION – Sustainable infrastructure and renewable energy solutions at the precinct scale

O32 in infrastructure co-ordination, states: *To encourage environmentally sustainable design and development and encourage the use of sustainable energy across the precinct.*

This contains two objectives – one relating to environmentally sustainable design and development AND on relating to sustainable energy. The terminology ‘environmentally sustainable design and development’ typically refers to buildings and could, in this instance, be confusing. By way of example, the Infrastructure Design Manual (the regional equivalent of the Engineering Design and Construction Manual) refers to sustainable infrastructure as simply that - ‘sustainable infrastructure’. The terminology ‘sustainable energy’ could also be clarified as renewable energy. To avoid confusion, CASBE supports the revision of Infrastructure Coordination O32 as follows:

O32 *To encourage the use of sustainable infrastructure and renewable energy solutions across the precinct.*

We note that there is no corresponding requirements or guidelines for O32. CASBE is of the view that a guideline is required to ensure renewable energy solutions are realised at the precinct scale.

CASBE recommends that:

- **O32 is revised as follows: O32 To encourage the use of sustainable infrastructure and renewable energy solutions across the precinct.**
- **A new guideline be linked to O32: Guideline: Electricity infrastructure planning and design should consider opportunities for precincts to operate as micro-grids (as recommended in *Melton East PSP – Climate Resilience Assessment – Implementation Plan*).**
- **The VPA works with the relevant electricity authority to develop guidelines to support renewable energy precinct solutions across the precinct.**

Embodied carbon

CASBE supports sustainable infrastructure which reduces embodied carbon emissions as recommended in Melton East PSP – Climate Resilience Assessment –Implementation Plan.

The PSP as currently drafted does not address embodied carbon. The Climate Resilience Assessment –Implementation Plan identified strategies for reducing embodied carbon in the discussion around waste and circular economy, as follows:

WASTE – Prioritise a transition towards a circular economy by reducing new material inputs and implementing systems to support reductions in waste to landfill.

CASBE recommends that the PSP includes requirements for embodied carbon.

CASBE recommends that:

- **A new guideline: Development should seek to:**
 - **Minimise levels of embodied carbon within construction materials by favouring the use of locally sourced materials with high recycled content and low embodied carbon**
 - **Maximise resource recovery and recycling during construction phase**

Thank you for taking the time to consider our submission. For any further information, please contact [REDACTED] or casbe@mav.asn.au.

Yours sincerely



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CASBE member councils include:

City of Ballarat	Hepburn Shire Council	Mornington Peninsula Shire Council
City of Banyule	Hobsons Bay City Council	Mount Alexander Shire Council
Bass Coast Shire Council	City of Hume	Murrindindi Shire Council
City of Bayside	Indigo Shire Council	City of Port Phillip
City of Boroondara	City of Kingston	City of Stonnington
City of Brimbank	City of Knox	Strathbogie Shire Council
Cardinia Shire Council	City of Manningham	Surf Coast Shire Council
City of Casey	City of Maribyrnong	City of Warrnambool
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