



28 April 2025

Attn: Jonathan Spear
Chief Executive Officer
Infrastructure Victoria
Level 33, 140 William Street
MELBOURNE VIC 3000

Via email: enquiries@infrastructurevictoria.com.au

Dear Jonathan,

FEEDBACK ON THE DRAFT 30-YEAR INFRASTRUCTURE STRATEGY

Please accept this feedback on Infrastructure Victoria's (IV) draft 30-year infrastructure strategy on behalf of the Melbourne 9 (M9), an alliance of the nine inner-metropolitan Melbourne councils - Melbourne, Darebin, Hobsons Bay, Maribyrnong, Merri-bek, Moonee Valley, Port Phillip, Stonnington and Yarra.

Together M9 represents 1 in 5 Victorians and accounts for more than 30 percent of Victoria's Gross State Product. Collectively M9 councils manage over \$15 billion worth of essential municipal and community assets.

M9 welcomes the release of the draft 30-year infrastructure strategy and acknowledges the vision of IV to recommend policies, reforms and projects that will bring long-term benefits to the State.

As the leading voice of the inner-metropolitan region, M9 thanks IV for the opportunity to contribute our collective thoughts and ideas for the State's infrastructure, and provide our vision for what the next decade will look like.

As the fastest growing State in Australia, Victoria is expected to reach a population of 10 million people by 2051. Melbourne is likely to be home to more than 70 percent of the population by 2051 (an estimated 7.7 million people) and will be Australia's largest metropolis.

A quarter of the State's growth is expected to occur in the M9 region. Housing targets set by the Victorian Government through *Plan for Victoria* will double the number of dwellings in the M9 region – from 570,000 dwellings to over 1.1 million dwellings by 2051.

The inner-metropolitan region continues to be the centre of major employment precincts and activity centres, a place for landmark events – arts, sports, celebration and entertainment, a destination for tourism, and a region with access to great open spaces, education, health services and other key amenities.

It is important therefore that we do not lose sight of the significant role of the inner-metropolitan region. Any future plans must adequately address the complexity of needs in the inner-metropolitan region which differ greatly from the characteristics of the outer metropolitan and peri-urban areas, and regional and rural communities.

ROLE OF LOCAL GOVERNMENT

Councils have a broad remit; the communities supported by the nine councils which make up the M9 region are diverse and have a range of different and important needs. The relative investment in



services differs across councils based on many factors and shifts over time. Overall, it is communities themselves that are best placed to determine what services and supports are most valuable to them.

M9 shares IV's vision to ensure there is strong alignment and partnerships between, across and with governments. All three levels of government, along with communities and businesses, have a vital role in supporting the development and delivery of infrastructure projects.

M9 stands ready to actively engage and partner with the Victorian Government to create a prosperous, more inclusive and sustainable Victoria over the next 30 years.

FINANCIAL SUSTAINABILITY OF SECTOR

It is important to note that councils are facing increasing pressures around financial sustainability and there is a need for the State to assist the sector by providing greater autonomy and flexibility to enable councils to manage their finances effectively.

Cost shifting has also been a major financial issue for many years and poses a risk to the ability of council to deliver services and make long-term plans. Cost shifting can occur when local government is required to perform new functions or maintain a level of service delivery but are not supplied with adequate resources to do so.

Some sector estimates herald a cumulative burden of cost shifting in the order of \$6.2 billion in a 10-year period (preceding 2021). Key services councils provide to the community on behalf of the Victorian Government include things such as school crossing supervision, maternal and child health services and library management.

While M9 welcomes the opportunity to partner with the Victorian Government on various initiatives as recommended by IV, it is important that these projects are adequately funded and costs supported by the Victorian Government. This will ensure there is a clear understanding of funding arrangements and should eliminate any potential funding gaps.

ACCESS TO HOUSING, JOBS, SERVICES AND OPPORTUNITIES

Housing

Victoria is currently experiencing a shortage of housing. Addressing these shortages long-term will need to be a combined effort of all three levels of government in consultation with the community. The delivery of housing needs to balance a range of priorities to ensure we continue to maintain liveable and thriving neighbourhoods.

M9 is committed to facilitating sound, strategic and coordinated planning to support the growth and development of land across our region. Local governments are planning experts with local knowledge of our communities - we understand our role in the system to help deliver more homes. Any changes to planning requirements should seek to utilise this local knowledge through engagement and partnership with councils.

Affordable housing is vital for an inclusive, diverse and prosperous city. The establishment of sustained and diverse funding streams to enable long-term social and affordable housing delivery is a key priority for M9.

As housing prices increase, greater numbers of households are unable to afford suitable private rental housing or enter home ownership. This is resulting in the inner-metropolitan region becoming increasingly inaccessible for many, including key workers who are traveling more than 30km to perform essential functions in the inner-metropolitan region.

Specifically, M9 supports the need to see that the Victorian Government:

- Ensure affordable housing is treated, and funded, as essential infrastructure.
- Maximise the delivery of social housing on government-owned land.
- Investigate opportunities for more consistent framework in the planning system to allow for the delivery of more social and affordable housing.

Infrastructure

M9 welcomes IV's recommendation to invest in kindergarten infrastructure and supports the call that general government revenue can fund new kindergartens.

However, M9 would like to see IV broaden its recommendation to build libraries and aquatic centres in growth areas. This recommendation should include funding existing community infrastructure across the inner-metropolitan region.

The Institute of Public Works Engineering Australia (IPWEA) estimates it will cost \$51 billion to replace poor infrastructure and longer term, \$106-\$138 billion to replace infrastructure currently in fair condition. IPWEA concludes that an infrastructure renewal gap is prevalent, that is, assets are deteriorating faster than councils can fund maintenance and/or renewal works for.

A major threat to council's financial sustainability is the long-term ability to maintain existing assets to an adequate level. Typically, asset repair and renewal is considerably more costly than building new infrastructure.

A shift in both State and Federal funding is required to ensure asset renewals and upgrades are supported in addition to new infrastructure projects.

Again, cost shifting must be considered when reviewing IV's recommendations. Councils across Victoria currently provide around 83 percent of operational funding to cover the cost of library services despite no legislative requirement to do so. Historically, library funding was shared, with a 50:50 split between the Victorian Government and councils however this has significantly declined in recent years. Additional funding is required to help libraries service demand across all areas of Victoria.

Transport

High quality transport is essential to the liveability of any region, but it is particularly important across the inner-metropolitan area. M9 supports IV's sentiment that quality connectivity and transport links mean people can have better access to housing, jobs and key services.

If the long-term vision is for more homes to be built closer to the transport network, this needs to be underpinned by, and developed in conjunction with, a transport strategy. M9 is calling for the development and implementation of a Victorian Transport Strategy.

Concrete guidance should also be provided to developers and councils on how to adapt and meet the Victorian Government's housing targets from a transport perspective, including the consideration of land use and economic development.

M9 supports initiatives that deliver and maintain active and public transport infrastructure. Specifically, we would like to see the following prioritised:

- Delivering PTV's 2012 Network Development Plan - this is key to improving access to jobs and housing, including by:
 - Committing to early works and scoping for Melbourne Metro 2.
 - Duplicating the Upfield Line and increasing frequency.
- Reforming Melbourne's bus network operations in line with Victoria's Bus Plan.

- Providing funding for the delivery of Victoria's Strategic Cycling Corridors, including funding for local governments to deliver on strategic walking and cycling infrastructure.
- Creating a fully DDA accessible public transport system.

HEALTHY AND SAFE COMMUNITIES

M9 understands the need to ensure design in urban planning fosters inclusive environments - be it celebrating First Nations culture, or increasing accessibility in tourism, arts and cultural facilities and sporting infrastructure.

M9 welcomes engagement and collaboration to empower communities to play their role in shaping the future of these urban places.

Each council across the M9 region is also seeking to enhance climate resilience and disaster preparedness, as well as working to increase crime prevention strategies.

Community safety or perception of safety is hard to quantify and measure. Informed research and reporting in this area would be extremely beneficial for our councils. M9 is calling on the Victoria Government to support research and reporting on national urban safety priorities, including indicators that measure access, safety and cohesion in cities in a placemaking context.

ABORIGINAL PEOPLE HAVE SELF-DETERMINATION AND EQUAL OUTCOMES

M9 notes that the Victorian Government is working with Traditional Owners to embed their voices, rights and aspirations into future plans for Victoria. We welcome the outcomes of these discussions and stand ready to listen and learn from Traditional Owners and First Peoples.

M9 is committed to meaningfully engaging with Traditional Owners and First Nations communities within our region to enable greater self-determination, better protect Country and improve outcomes for First Peoples and all Victorians.

A THRIVING NATURAL ENVIRONMENT

The significance of open space for community wellbeing in a dense urban environment was highlighted during the COVID-19 pandemic and there are many learnings to take from this as we look forward.

The M9 region is fortunate to have an extensive network of large public parks and waterways that weave across the area. These parks and waterways provide opportunities for people to be social and active, engage with the water and connect with the cultural history of place.

However, these spaces will face increasing pressure from a growing population and climate change. With higher density living comes less private open space and this will place even more importance on both the quality and quantity of public open spaces. An innovative approach will be required as to how new open spaces are created in the urban environment, and to ensure equitable access to this open space.

M9 is seeking the Victorian Government to ensure the upfront provision of land and funding is provided for open/green spaces, establishing guidance for open space contributions and funding mechanisms.

RESILIENT TO CLIMATE CHANGE AND OTHER FUTURE RISKS

All M9 councils have declared or acknowledged a state of climate emergency that requires urgent action by all levels of government. Councils are on the front line responding to the impacts of climate change as local communities are increasingly affected by disasters such as floods, heatwaves and bushfires.

With plans for increasing density of housing, the challenge will be in ensuring urban growth is sustainable and climate resilient. The State will need to prepare for more extreme weather events.

M9 councils have undertaken a series of risk assessments and asset planning scenarios that detail the many asset management challenges for inner-metropolitan areas. Looking to the future, the design, construction and management of the built environment and infrastructure needs to be adaptive and resilient to the impacts of climate change.

M9 supports the identification of opportunities within the planning system and building design process that take a positive approach to managing the impacts of climate change – including new environmental standards for buildings and a focus on green infrastructure such as minimum canopy tree provision requirements. While seeking reform, it is important that a minimum standard be that no changes result in a decrease in effective environmental standards for any given jurisdiction.

Flood mapping and considerations

The M9 region is particularly vulnerable to flooding due to the increase in storm severity and frequency, more extreme rainfall and rising sea levels, particularly in areas across the region that border urban waterways or were once wetlands/swamps.

M9 is seeking assurance that the Victorian Government will provide clarity and guidance regarding flood management and the mitigation of risks. There are currently considerable inconsistencies in areas in which the Victorian Government has identified for growth, and areas classified as being at risk of flooding.

The protection of life and property must be prioritised in areas subject to flooding, reflecting the planning approach to bushfire prone areas.

Specifically, M9 is calling on the Victorian Government to:

- Ensure up-to-date information from relevant authorities is incorporated into the planning scheme and streamline planning scheme amendment processes.
- Identify consistent precinct scale flood mitigation measures for the inner-metropolitan region.
- Develop more comprehensive guidelines and a range of flood resilient design solutions for development – particularly addressing the conflict between heritage overlays and flood management requirements.
- Implement integrated water management practices for all urban rivers to enhance flood management, improve water quality and increase biodiversity.
- Improve stormwater quality and management.
- Ensure consistent flood management messaging and actions across all Victorian Government departments and agencies.

Further to the possible actions listed, M9 would like to see the following solutions:

- More sustainable funding mechanisms for local government infrastructure and assets in response to the climate crisis.
- Investment to train and upskill the workforce who will play an important role in climate resilience.
- Good quality data to ensure informed planning, action and decision-making.

HIGHER PRODUCTIVITY AND CIRCULAR ECONOMY

Infrastructure contributions

To ensure that infrastructure is delivered across the M9 region in a timely manner that meets community needs, the following is suggested to ensure a more integrated approach:

- A comprehensive funding and finance strategy – this is critical to identify funding and delivery pathways for all infrastructure classifications, including those within and separate to the DCP, and to provide greater certainty for all agencies and landowners involved in delivering infrastructure.
- A governance partnership and implementation strategy – councils require an understanding of how the Victorian Government intends to manage the delivery of infrastructure. There is a need to resolve governance and implementation requirements through partnerships and strategies that identifies the role of all agencies in the future projects, including the prioritisation, planning, design and delivery of infrastructure.

CONCLUSION

M9 recognises IV's commitment to create a prosperous, more inclusive and sustainable Victoria over the next 30 years. As the level of government closest to the community, local government is a vital part of this conversation.

More support is required from the Victorian Government to ensure councils are equipped and enabled to continue to deliver local infrastructure and services that will accommodate urban growth and development.

Thank you for receiving this feedback on the draft 30-year infrastructure strategy. [REDACTED]

Yours sincerely,

[REDACTED]

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