



***Town and Country Planning Association
Incorporated***

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***Submission by the Town and Country Planning Association Inc.
to Infrastructure Victoria***

Victoria's draft 30-year strategy 2025

28 April 2025



Enquires to Peter Hill, Honorary Secretary



Introduction

Infrastructure Victoria is to be commended for its wide-ranging investigation into infrastructure needs and priorities throughout Victoria, and for the opportunities it has provided for community comment and input through its consultative processes.

The TCPA has reviewed *Victoria's Draft 30-Year Infrastructure Strategy* (March 2025) (the Draft Strategy) and is supportive of all but one of the recommendations. With that one exception all recommendations align with the TCPA's position. The TCPA has also identified some matters it feels the Draft Strategy should include or clarify.

This submission is divided into two parts:

- *Part 1 – Preliminary matters*, including matters identified as gaps in the Draft Strategy.
- *Part 2 – TCPA Responses to 2 Recommendations 1 – 40 and associated Future Options* outlined in the Draft Strategy as follows:
 1. *Recommendation 7 – Future Option*: Phase out residential stamp duties (and replace with land tax). This is the only recommendation that the TCPA does not support in any way. The response outlines its reasons for not supporting the recommendation.
 2. *Recommendations 1 – 40 and associated Future Options* including whether Supported or Supported in principle and any additional comments as relevant.

The TCPA commends Infrastructure Victoria on the Draft Strategy and would be pleased to engage further with Infrastructure Victoria on the issues raised in this submission, if desired.



Part 1 – Preliminary matters

1. Disconnect between the IV Draft 30-year Strategy and Plan for Victoria.

The TCPA is surprised that there is not connection between the Draft Strategy and the *Plan for Victoria* given they were released within days of each other. While they were developed by separate agencies, we might have expected the later released one to refer to the earlier.

However, given both are now in the public realm, there is the opportunity for the Final Strategy submitted to the Victorian government to make some connections. The TCPA has identified some matters that should be addressed.

What is meant by a "compact city"?

The Draft Strategy defines "compact cities" as those "where people live and work closer together" (page 14) and suggests that low density cities like Melbourne, Geelong, Ballarat and Bendigo can be made more "compact".

In the Infrastructure Victoria report, *Choosing Victoria's Future*, (October 2023)¹ the "Compact City" scenario refers only to densification of inner metropolitan Melbourne. It does not apply the concept to regional cities. The Draft Strategy should explore this more detail for regional cities.

The word "compact" implies small and tightly spaced/packed. In its best manifestation, a compact city could be equated with a walking and cycling city. Melbourne, Geelong, Ballarat and Bendigo will never be compact. The word "compact" should be replaced by "dense".

Plan for Victoria seems to adopt the "Network of Cities" model proposed in *Choosing Victoria's Future* with more detail for Geelong, Ballarat and Bendigo only. However, while it adopts the term "compact cities", it does not discuss development implications for regional areas:

- Albury/Wodonga and other regional cities and cross-border communities
- Gippsland (odd since there has been a whole of government strategy for the Latrobe Valley in particular!)

2. Infrastructure Victoria's 30-year Strategy 2021 – TCPA updates

TCPA submission to the 2021 30-year Strategy² outlined the challenges it believed were facing growth in regional Victoria and gaps needing to be addressed before that strategy was finalised and presented to the Victorian Government.

Many of the challenges remain today, in particular the problems of growth imbalance between Melbourne and regional cities, regional growth plans

¹ Infrastructure Victoria report, *Choosing Victoria's Future*, (October 2023)
<https://www.infrastructurevictoria.com.au/resources/choosing-victorias-future>

² TCPA Submission to Infrastructure Victoria *Draft 30-Year Strategy* (February 2021)
<https://tcpa.org.au/wp-content/uploads/2025/04/TCPA-Submission-to-IV-Draft-30-year-Infrastructure-Strategy-December-2020-26-02-2021.pdf>



Since, TCPA has published two important papers jointly with the Rail Futures Institute that considered the role of rail services as a catalyst for regional growth, particularly in Victoria's ten key regional cities³.

- *Rail as a Catalyst for Regional Growth* (December 2021)
- *Growing Victoria's Regions: Rail the Catalyst for Regional Growth - Summary Report* (July 2024) and *Main Report* (December 2024)

Other papers considering regional growth include:

- *High Speed Rail for Regional Growth* (March 2021)⁴
- *A Decentralisation Strategy for Australia* (February 2022) jointly with Fastrack Australia⁵

During 2025, the TCPA is building on these pieces of work to consider the role of rail (and other infrastructure) in shaping Victoria to meet the challenges facing Melbourne.

3. Regional growth and the 2025 draft 30-year strategy

The 2021 30-Year Strategy had a key theme and 19 recommendations to "Develop Regional Victoria" under sub-headings:

- Enhance market access and productivity (Recommendations 77 – 80)
- Unlock regional economic growth opportunities (Recommendations 81 – 84)
- Connect the regions to help strengthen wellbeing (Recommendations 85 – 88)
- Foster regional Victorians' health safety and inclusion (Recommendations 89 – 95)

All these issues remain just as pressing in 2025 as they were in 2021 – if not more pressing. Regional areas have continued to grow following the COVID pandemic, particularly in regional cities and coastal towns.

The TCPA would like to see the 2025 30-year strategy strengthen its dialogue in respect of regional Victoria. The Draft Strategy currently has only generic references to infrastructure issues for regional cities and towns and does not cover the scope of recommendations contained in the 2021 strategy. There is no specific discussion on infrastructure issues in each regional city, much less towns or rural areas.

TCPA considers it is important that the Draft Strategy addresses regional Victoria geographically as well as metropolitan Melbourne.

³ *Rail as a Catalyst for Regional Growth* (December 2021)
<https://tcpa.org.au/wp-content/uploads/2022/01/Intercity-Discussion-Paper-Final.fullversion.23-December-2021.pdf> and

Growing Victoria's Regions: Rail the Catalyst for Regional Growth Summary Report (July 2024) and *Main Report* (December 2024) can be accessed via <https://tcpa.org.au/wp-content/uploads/2024/07/RFI-TCPA-Growing-Victorias-Regions-Summary-Report-28pp-July-2024.pdf> and <https://tcpa.org.au/wp-content/uploads/2024/12/RFI-TCPA-Growing-Victorias-Regions-Main-Report-19-Dec-2024.pdf> respectively.

⁴ *High Speed Rail for Regional Growth* (March 2021)
<https://tcpa.org.au/wp-content/uploads/2022/04/High-Speed-Rail-for-Regional-Growth.pdf>

⁵ *A Decentralisation Strategy for Australia* (February 2022)
<https://tcpa.org.au/wp-content/uploads/2022/03/Decentralisation-Strategy.pdf>



4. GAP - Planning processes for Bay West need to be undertaken within 5 years.

The 2021 30-Year Strategy considered the need to address future port capacity at the Port of Melbourne and Bay West (2021 Recommendations 24 and 25). Port capacity issues remain just as pressing in 2025 as they were in 2021 – if not more pressing.

The Port of Melbourne is already showing signs of being unable to operate effectively within its current gazetted planning scheme footprint or to mitigate negative impacts in surrounding communities. Recent articles⁶ published in the media include articles published by The Age on

- 24 April 2025, *Melbourne roads to cop tripling of trucks as rail plans flounder*
- 25 April 2025, *Has the Port of Melbourne outgrown its prime slice of the city?*

Since 2009, Victorian ports strategies have addressed the need for a future port on the western side of Port Phillip, known as Bay West. The most recent strategy, *Navigating our Port Futures* (July 2022), lists a key action in relation to Bay West at Page 30:

- **Planning protections for Bay West:** *Land use and transport planning protections must be progressed to preserve Bay West as a viable future location for Victoria's second container port. Government will formulate and implement a roadmap to deliver planning protections to secure necessary land and protect Bay West as a future container port.*

Plan for Victoria shows an indicative location for a future Bay West port near Werribee South on *Map 7: Melbourne's Economic Strengths*. Like many Victorian coastal areas, that indicative location has significant environmental issues of international, national and local importance. As was demonstrated with the environmental assessments for the Port of Melbourne Channel Deepening Project, there is not a complete knowledge of Victoria's coastal environment.

The processes associated with assessing these issues alone, much less those associated with actual port development, will require several years to complete. The sooner the planning phase begins, the better. Certainly, the environmental and planning processes must commence within 5 years to ensure that all impacts are identified and fully understood.

The Draft Strategy Recommendation 35 recommends that each department that owns infrastructure to:

- develop an infrastructure sector plan as soon as possible, based on agreed assumptions for future population, jobs and land use for more compact cities; and then
- publish strategic-level plans; and
- Use the finished sector plans to decide infrastructure project funding.

Given the above, Recommendation 35 should be complemented by a recommendation (not a future option) addressing Bay West in order to provide certainty as to

- whether the indicative location shown in *Plan for Victoria* could be viable; and
- the matters that will need to be considered for port construction and operations.

The TCPA considers that, in addition to infrastructure plans referred to in Recommendation 35, the Draft Strategy must include the need to bring on additional port capacity and, in particular, to recommend that assessment and planning processes for Bay West be commenced within five years.

⁶ The Age articles of 24 & 25 April 2025 accessed same dates
<https://www.theage.com.au/national/victoria/melbourne-roads-to-cop-tripling-of-trucks-as-rail-freight-plans-flounder-20250410-p5lqr5.html> and <https://www.theage.com.au/national/victoria/has-the-port-of-melbourne-outgrown-its-prime-slice-of-the-city-20250410-p5lqro.html>



Part 2 – TCPA responses to recommendations and future options

1. Recommendation 7 – Future Option: Phase out residential stamp duties (and replace with land tax)

The TCPA is very concerned that the Strategy presents this future option in an overly simplistic manner. It appears to be advocating the replacement of one very complex framework, stamp duty, with another even more complex one, land tax. The Strategy omits any discussion on the complexities of each that property purchasers/owners need to navigate. Indeed, dealing with the multitude of exemptions/concessions in each framework could be more of a disincentive than the actual payments themselves.

Stamp Duty

In Victoria, “stamp duty” (formally known as land transfer duty) is a one-off tax paid by a property purchaser on the value of a property collected at the time of transfer of ownership – usually the greater of the purchase price or assessed market value (for other transfers). Both the purchase price and assessed market value account for the capital improved value of the property. A couple of questions arise.

- *Could payment of the stamp duty be spread over a period, rather than being required upfront?*
Having the option of periodic payments could ease the burden of purchase.
- *Could past “temporary” stamp duty exemptions/concessions provide models for precincts where housing densification is a priority?*

In 2021-22 a temporary arrangement of 50% of the duty otherwise payable was available for the purchase of a new residential property within the City of Melbourne (with a dutiable value of \$1 million or less)⁷. While the State Revenue Office (SRO) is not specific, the timing of the arrangement suggests that it was a post-COVID policy initiative to stimulate residential growth in the City of Melbourne. The Strategy should consider whether such a concession would be a model for other precincts where housing densification is a priority.

TCPA:

- **Recognises that the current stamp duty arrangement can act as a disincentive**
- **Considers that a regime based on capital value is more equitable for purchasers, whether they of detached houses or apartments.**
- **The Strategy needs to more thoroughly consider the use of provisions in the existing stamp duty framework.**

Land tax

Currently, land tax is paid annually and is calculated using the site values (determined by the Valuer-General Victoria⁸) of all taxable land owned by an individual/entity as at midnight on 31 December of the year preceding the year of assessment.

Site value is the unimproved value of land, which means it excludes capital improvements such as buildings. As presented in the Strategy, applying a land tax regime could unfairly penalise purchasers of detached houses on single lots over purchasers of land developed for multiple dwellings – be they townhouses or apartments in high-rise buildings. A more thorough analysis is required for the Strategy.

⁷ SRO – Land transfer duty <https://www.sro.vic.gov.au/land-transfer-duty>

⁸ Valuer-General land valuations are determined annually for:

- site value (used for land tax);
- capital improved value and vacant residential land tax; and
- capital improved value and windfall gains tax (applies to the value uplift as the result of a rezoning).



The SRO publishes the general land tax rates on its website⁹. Exemptions apply to over 20 circumstances across different parts of Victoria, including land exclusively used as for principal place of residence, primary production land, retirement villages, social and emergency housing and residential care facilities/supported residential services.¹⁰ By specifying exclusive use of land, land with mixed uses would not enjoy any exemption even if it included more than one exempt use.

There are also circumstances where surcharges are applied to land tax, including surcharges for absentee trusts and land owners.

In the past, there have been pressures on urban development boundaries around cities and towns across Victoria because of speculation on and land-banking of rural land in their vicinity. It is important to maintain the integrity of urban boundaries. Such pressure for provision of more infrastructure place capacity and funding burdens on councils and other service providers.

With increasing densification and property value uplift there needs a property-based system can account for mixed uses – e.g. Nillumbik Community Health Services clinic in Box Hill has recently been hit with higher rental threatening its viability in the precinct due to value uplift due to the Suburban Rail Loop project (as reported in The Age, 27 April 2025¹¹).

TCPA considers that a regime based on unimproved value of land could:

- **Unfairly penalise purchasers of detached houses over purchasers of land developed for multiple dwellings – be they townhouses or apartments in high-rise buildings**
- **Encourage developers to speculate on and land-bank rural land beyond urban growth boundaries applying to Victorian cities and towns**
- **Discourage the provision of community services in mixed use developments.**

CONCLUSION

Clearly, the current existing stamp duty and land tax frameworks do not adequately address the issue of housing affordability.

Ideally, a new framework is required that:

- replaces the current stamp duty with a market-value property tax;
- provides flexibility for properties in mixed use developments – either owned or rented.
- includes land and capital improvements; and
- provides quantitatively formulated offsets for infrastructural and externality cost savings for higher density land uses that can provide behavioural incentives for property users and developers to prefer higher density residential property configurations.

Infrastructure Victoria should undertake and report on a more thorough analysis of the opportunities for a property tax framework within the next 12 months, including the matters raised above.

TCPA considers that, for all the above reasons, this future option should not be included in the Strategy until a more thorough analysis is undertaken.

Further information: <https://www.sro.vic.gov.au/land-tax/land-valuations>

⁹ SRO – Land tax general rates <https://www.sro.vic.gov.au/rates-taxes-duties-and-levies/land-tax-current-rates#general24>

¹⁰ SRO Land tax exemptions <https://www.sro.vic.gov.au/land-tax/land-tax-exemptions>

¹¹ The Age, 27 April 2025, As the Suburban Rail Loop drives up rents, this affordable health clinic could become homeless, via <https://www.theage.com.au/lifestyle/health-and-wellness/as-the-suburban-rail-loop-drives-up-rents-this-affordable-health-clinic-could-become-homeless-20250421-p5lt7c.html>



2. TCPA Responses to Recommendations 1 – 40 and associated Future Options

IV Recommendation/ Future Option		TCPA position	TCPA comments
No.	Heading		
Victorians have good access to housing, jobs, services and opportunities			
1	<u>Build more social housing</u>	<u>Support</u>	
2	<u>Facilitate markets and invest in kindergarten infrastructure</u>	<u>Support in principle</u>	Several questions arise. - Should there be clear locational criteria for kindergartens regardless of whether they are council or private sector run? - E.g. close to neighbourhood activity centres, near primary schools, maternal health care centres etc. - Should there be population targets for kindergartens in Melbourne and key regional cities? - What targets should apply in regional areas? - How should such criteria and targets be used to inform development contributions plans? https://www.planning.vic.gov.au/_data/assets/pdf_file/0033/632598/Ministerial-Direction-Preparation-and-content-and-reporting-requirements-for-Development-Contributions-Plans.pdf
3	<u>Plan and deliver expanded and new schools</u>	<u>Support</u>	
4	<u>Expand TAFE in Melbourne's growth areas and some large regional centres</u>	<u>Support</u>	
5	<u>Build libraries and aquatic centres for Melbourne's growing communities</u>	<u>Support in principle</u>	Too Melbourne centric. It is important to address the needs and issues for regional cities and towns. - What about growing regional cities (e.g. City of Greater Geelong has had issues with library closures due to not maintaining their funding programs)? - Need to set targets for libraries/population and THEN consider the geographic distribution of library services
6	<u>Make government infrastructure more accessible</u>	<u>Support in principle</u>	Consider building code changes to require accessibility into non-commercial or government buildings



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IV Recommendation/ Future Option		TCPA position	TCPA comments
No.	Heading		
7	<u>Rezone locations near existing infrastructure for more home choices</u>	<u>Support in principle</u>	More detail required • Caveat: Change planning rules to require densification with adjoining public open spaces. Not “wall-to-wall” buildings. • Rezoning with other incentives, including air rights regimes or tax exemptions/concessions • Need to address dwelling occupancy to ensure that we don't end up with near-empty high rise pencil towers. • <u>Recommended reference:</u> New York City “incentivised zoning” case study reported in The B1M YouTube episode, <i>Why New York's Billionaires' Row is Half Empty</i>, (2022) includes reference to initiatives in Melbourne and Vancouver. <u>View via:</u> https://www.youtube.com/ and type “Why New York's Billionaires' Row is Half Empty” in the search bar.
Future option	<u>Mandate more affordable homes near existing infrastructure</u>	<u>Support in principle</u>	More detail needed about method and costings
Future option	<u>Phase out residential stamp duties (and replace with land tax)</u>	<u>Not supported</u>	See Part 2, Section 1 above The B1M YouTube episode – <i>Why New York's Billionaires' Row is Half Empty</i> (2022) – also includes discussion relevant to this option.
8	<u>Extend Melbourne's trams to encourage more new homes nearby</u>	<u>Support in principle</u>	This recommendation should • Consider whole strategic tram routes for increased housing density – not just the extensions • Enlarge scope to densify linear corridors served by bus rapid transit and trunk bus routes • Address the need to require activity centre structure plans to that include provision for tram corridors and stops as well as interchange with other public transport modes (especially for Chadstone). A possible Future Option could include a proposal that • Converts the Alamein rail to a light rail corridor; and then • Extends via a new light rail corridor though East Malvern, Chadstone, Oakleigh or Hughesdale, Huntingdale, North/Wellington Roads, Monash University to Stud Road.



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IV Recommendation/ Future Option		TCPA position	TCPA comments
No.	Heading		
9	<u>Run faster bus services, more often, in Victoria's largest cities</u>	<u>Support in principle</u>	More work and analyses needed - Bus services need to be designed around a bus network hierarchy that recognises the location of activity centres and their connection to local communities – regional, city wide and local networks as noted in IV's <i>Get on Board: Making the most of Melbourne's buses – discussion paper</i> (December 2022) https://assets.infrastructurevictoria.com.au/assets/Resources/Get-on-board-making-the-most-of-melbournes-buses-discussion-paper.pdf . - More work and analyses need to be undertaken in respect of existing and potential bus service upgrades in all Victoria's regional cities.
10	<u>Build a new bus rapid transit network</u>	<u>Support in principle</u>	More work and analyses needed - Orbital BRT routes need to completely encircle metropolitan Melbourne. - Concept map on page 43 has serious gaps between: – the eastern and north-eastern suburbs; and – the north-eastern and northern suburbs.
11	<u>Extend metropolitan trains and run more services in Melbourne's west</u>	<u>Support in principle</u>	More work and analyses needed Consider emerging proposals that could be enhanced by recommended extensions, e.g. Melbourne Metro 2.
12	<u>Run more bus and coach services in regional Victoria</u>	<u>Support in principle</u>	More work and analyses needed - Need to consider cross-border services along strategic routes – Wodonga routes should be better integrated with Wodonga and Albury railway stations (Wodonga-Albury services terminate in the centre of Albury with no stop at the railway station. Wodonga town bus services do not stop anywhere near the station – nearest town bus stop is a kilometre from the station!!!)
13	<u>Make off-peak public transport cheaper and simplify regional fare zones</u>	<u>Support in principle</u>	See also comments on Recommendation 40 and the following Future Option road pricing strategies that could link road pricing to the funding of public transport services and fares.



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IV Recommendation/ Future Option		TCPA position	TCPA comments
No.	Heading		
Victorians are healthy and safe			
14	<u>Make local streets safer for children and communities</u>	<u>Support</u>	
15	<u>Build safe cycling networks in Melbourne and regional cities</u>	<u>Support in principle</u>	More work and analyses needed The IV proposed cycling network is deficient in across-suburban paths
16	<u>Help government schools share their grounds</u>	<u>Support</u>	
17	<u>Invest in maintenance, upgrades and expansions of community health facilities</u>	<u>Support</u>	
18	<u>Build more residential alcohol and other drug treatment facilities</u>	<u>Support in principle</u>	Ensure such centres are medically supervised
19	<u>Invest in digital healthcare</u>	<u>Support</u>	
20	<u>Upgrade critical public hospital infrastructure</u>	<u>Support in principle</u>	More work and analyses needed Should include hospital infrastructures in regional cities
21	<u>Better use prisons and invest more in health facilities and transition housing</u>	<u>Support</u>	
Aboriginal people have self-determination and equal outcomes to other Victorians			
22	<u>Invest in secure homes for Aboriginal Victorians</u>	<u>Support</u>	



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IV Recommendation/ Future Option		TCPA position	TCPA comments
No.	Heading		
23	<u>Fund better health and wellbeing infrastructure for Aboriginal Victorians</u>	<u>Support in principle</u>	An important proviso should that the designated and appointed ACCOs have - unimpeded access to advisory help in their management practices; and - scrutiny of their performances.
Victoria has a thriving natural environment			
24	<u>Reduce greenhouse gas emissions from infrastructure</u>	<u>Support in principle</u>	More work and analyses needed
25	<u>Advance integrated water management and use more recycled water</u>	<u>Support in principle</u>	What about other regional cities and towns? Drought conditions currently exist in western Victoria (and south-east SA) with impacts in smaller cities and towns.
Future option	<u>Plan for and invest in manufactured water</u>	<u>Support in principle</u>	Planning needs to begin within 5 years to ensure resilience and adaptability for the future. Make recommendation rather than future option
26	<u>Better use government land for open space and greenery</u>	<u>Support in principle</u>	Much more detail is required
Victoria is resilient to climate change and other future risks			
27	<u>Better prepare infrastructure for climate change</u>	<u>Support in principle</u>	Much more detail is required
28	<u>Use new flood maps to revise planning schemes</u>	<u>Support</u>	Proposed initiative is well overdue
29	<u>Coordinate faster delivery of key energy infrastructure</u>	<u>Support in principle</u>	Much more detail is required
30	<u>Improve environmental assessments and site selection for energy projects</u>	<u>Support</u>	



IV Recommendation/ Future Option		TCPA position	TCPA comments
No.	Heading		
31	<u>Invest in home, neighbourhood and big batteries for more energy storage</u>	<u>Support</u>	
32	<u>Determine long duration energy storage needs</u>	<u>Support in principle</u>	More analysis required on potential solutions • But what will be the solutions? Nuclear generation, hydrogen, solar, wind, wave power or something else? • There is the overarching need for full integration of electricity supply strategies on an Australia-wide scale. • Is there scope for long distance ultra-high voltage transmission grids to move electricity across the continent and Tasmania?
33	<u>Develop regional energy plans, guide transition from fossil gas and maintain reliable gas supply</u>	<u>Support</u>	
34	<u>Speed up household energy efficiency and electrification</u>	<u>Support</u>	
Victoria has a high productivity and circular economy			
35	<u>Prepare and publish infrastructure sector plans to shape Victoria's cities</u>	<u>Support in principle</u>	Rather general narrative. • 15- to 20-year planning horizons are insufficient to design and proclaim connectivity corridors in the existing and especially the growth areas of Victoria's cities. • A 50-year horizon is desirable – that was the planning horizon of the former Melbourne and Metropolitan Board of Works (MMBW).
36	<u>Reform infrastructure contributions</u>	<u>Support in principle</u>	• More specific strategy and formulae will need to be developed and implemented. • Should the scope of the contribution framework be broadened to address more local facilities and services? E.g. libraries, swimming pools etc.



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IV Recommendation/ Future Option		TCPA position	TCPA comments
No.	Heading		
37	<u>Improve asset management of all government infrastructure</u>	<u>Support</u>	
38	<u>Prepare for more recycling and waste infrastructure</u>	<u>Support</u>	
39	<u>Use digital technologies to better design, build, operate and maintain government infrastructure</u>	<u>Support</u>	
40	<u>Use modern traffic control technology for efficient and safe journeys</u>	<u>Support in principle</u>	Needs much more detailed analysis
Future option	<u>Charge people fairly to use roads</u>	<u>Support in principle</u>	Needs much more detailed analysis - The TCPA submission the Infrastructure Victoria's 2017 paper "The Road Ahead" introduced the Dynamic Wide-Area Road Pricing (DWARP) system. - See https://tcpa.org.au/wp-content/uploads/2017/02/TCPA-Submission-to-IV-re-The-Road-Ahead-transport-network-pricing.pdf - We envisaged that a DWARP system would operate across all or much of Victoria and cover all road usage demands, including freight and public transport operations. - A state-wide coverage could provide an interface with future analogous road pricing systems in New South Wales or South Australia. - We consider that the DWARP system remains relevant and worthy of consideration.
41	<u>Make rail freight competitive, reliable and efficient</u>	<u>Support in principle</u>	Rail freight connectivity to Gippsland needs to be addressed.



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IV Recommendation/ Future Option		TCPA position	TCPA comments
No.	Heading		
42	<u>Encourage off-peak freight delivery in urban areas</u>	<u>Support in principle</u>	More analysis needed - The DWARP system referred to under the Recommendation 40 future option above is relevant to urban freight delivery. - Ensure that freight delivery precincts (commercial and industrial) in all regional cities are included – including Geelong and Portland for port related freight
Future option	<u>Plan for more efficient and sustainable urban freight</u>	<u>Support in principle</u>	More detail needed Ensure that freight delivery precincts (commercial and industrial) in all regional cities are included.
43	<u>Create and preserve opportunities for future major infrastructure projects</u>	<u>Support in principle</u>	Needs much more detailed analysis - This recommendation addresses the heading “Victoria can plan now for future infrastructure needs” - Preparing and publishing an integrated transport plan as required in accordance with the Transport Integration Act would be a good start! Plan for Victoria (and indeed Plan Melbourne and Regional Growth Plans) does not satisfy the Act. - Prepare and publish a similar plan/s for water, energy and social infrastructure.
Future option	<u>Reconfigure the City Loop for more frequent and reliable trains</u>	<u>Support in principle</u>	Needs much more detailed analysis - TCPA is aware that the Rail Futures Institute has been a strong advocate for City Loop reconfiguration and supports the Institute's position. - TCPA believes that a plan for reconfiguration should be in place within 5 years and implemented as soon as possible after. - This should be a separate recommendation rather than a future option
Future option	<u>Extend metropolitan trains to growth areas in Melbourne's north and south-east</u>	<u>Support in principle</u>	Needs much more detailed analysis - Add extensions to and across outer western and northern suburbs) - See also comment on Recommendation 11

– .END –