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File No: COR/806

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Mr J Hill
A/Executive Director
Metropolitan Planning - Audit
Department of Planning and Community Development
PO Box 500
EAST MELBOURNE VIC 3002

Dear Mr Hill

Melbourne 2030 Audit Submission

Council welcomes the opportunity to make a submission with respect to the Melbourne 2030 Audit.

Council's submission to the Audit is attached. This submission was developed through workshops involving all Councillors, taking into account the *Melbourne 2030 Audit: Guide to Submissions* document.

To date Council has expended significant energy and resources on structure planning for four of the Major Activity Centres within Bayside. Council is concerned that it sees little evidence of a coherent, whole of Government approach, on issues such as infrastructure capacity or comprehensive transport planning to address and ameliorate the implications of intensification of development.

The prime concern of Council is the lack of regard for local policy; policy which provides meeting metropolitan objectives, but in a manner attuned to local circumstances, opportunities and expectations.

Bayside Council would welcome the opportunity to further discuss in detail the matters which are raised in the attached submission. [REDACTED]

Yours faithfully

Cr John Knight
Mayor

Enc

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Bayside City Council

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Your Organisation's Comments

Bayside City Council Submission to M2030 Audit (2007)

Comment:

2. Process

The Government has proposed an audit of Melbourne 2030 and it is considered that a full review is required. Council has fundamental concerns about the policy direction of Melbourne 2030 and the ability to be able to deliver the policy position without compromising what is valued by local communities. The process of carrying out an audit rather than a comprehensive review is questioned by Council. A full comprehensive review of the strategy and Clause 12 should be undertaken.

Council seeks information on what the process will be once the Minister for Planning has considered the submissions received as part of the audit.

3. What in M2030 has worked for Council?

The introduction of M2030 has set a strategic framework and context for metropolitan growth.

It has in particular focussed Council's attention on the need for renewal of activity/retail centres and the high costs associated with renewal of infrastructure. Through the structure planning process an implementation plan has been developed for each centre. Council has estimated that the cost for implementation until 2030 for renewal and upgrade of infrastructure will be notable. Much of the funding for this work will be required to be met by communities through Local Government rates and charges.

This has drawn Council's attention to the limit of infrastructure capacity and the need for upgrade in parallel with growth or development of these centres.

The opportunity to work with DSE officers and develop the Southern Regional Housing Statement was welcomed along with the realistic opportunity figures for future housing in the municipality. However there is no clear status for these figures- they are aspirational only.

The awareness around environmental sustainability, water supply and demand issues has also increased since the introduction of M2030.

4. What has Council achieved since the introduction of M2030?

Since the introduction of M2030 Council has prepared and adopted structure plans for the four major activity centres of Bay Street, Brighton, Church Street, Brighton, Hampton and Sandringham. There has been a greater focus in the activity centres as a result with clear action plans impacting on many delivery services of Council.

Council sought and received Interim Height Controls for the four Major Activity Centres to provide interim controls for development pending the finalisation of the Structure Plans.

In addition, Council successfully introduced the Highett Structure Plan via Amendment C46, and the Bayside Business Employment Area Strategy (industrial re-zoning) via Amendment C39. The Beaumaris Concourse Structure Plan, C49 has been exhibited and a panel hearing has been conducted.

Council is on track to achieving the housing aspirations of M2030 based on an average annual nett increase in housing stock of 253 dwellings over the past decade, which is well in excess of the 218 per annum required to meet the Southern Regional Housing Statement aspirations.

5. What are the current Council challenges in delivering M2030?

M2030 has a number of policies designed to ensure that urban consolidation takes place in a manner that is fair and equitable, as well as being sustainable in terms of encouraging more environmentally sensitive outcomes.

It is argued that insufficient weight is frequently given to these other components of M2030 when decisions are made (a) by DSE when deciding whether or not to allow a planning scheme amendment, and (b) by VCAT when determining on appeals.

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Whilst on the one hand Councils have been asked to deliver the outcomes of Melbourne 2030 there has been a high level of interference in decision making at a local level.

There has been concern raised over the lack of respect for local policy. A source of great dissatisfaction, amongst developers and residents/objectors alike is the high level of uncertainty that surrounds planning decisions.

It is argued that this uncertainty arises out of insufficiently clear local policy in Planning Schemes. This in turn leads to variation in the manner in which councils and VCAT members interpret local policy.

It is also argued that the absence of clear local policies is leading to urban consolidation being achieved at the expense of neighbourhood character. There is a perception that councils are not able to have implemented their desired policies because of the reliance of urban consolidation on the borrowed amenity of existing and established character of an area.

There are two fundamental issues around local policy that are causing dissatisfaction amongst communities and Local Governments. These relate, firstly, to councils not being permitted to write clear and unambiguous local policy and, secondly, to concern that VCAT does not give appropriate weight to local policy when arriving at its decisions. Delivery of the objectives of Melbourne 2030 is the key challenge. Delivery in such a way to meet all objectives poses additional challenges. There are clear conflicts between policy Direction 1 (A more compact city) and Direction 5 (A great place to be). Direction 1 is given far more weight in practice than Direction 5, particularly in cases heard by VCAT. Council is firmly of the view that there should be a more balanced approach between these two Directions.

There is a need to balance the ambitions of M2030 with sustainability at a local level. There is currently unwillingness from State Government to support the introduction of sustainability principles and controls into local policy. For example Amendment C44 Water Sensitive Urban Design (developed as a pilot amendment for the Association of Bayside Municipalities and which generated no objections) has been with the Minister for consideration for over two years. This delay has not enabled Council to introduce measures at a local level to address stormwater discharge.

There is concern that the strategic direction is exploitative rather than being strategic. We consider being strategic involves having clear policy on what is required and the location of any development, rather than letting market forces have free reign. This relates to the development led approach and emphasis on high density development as a priority. There is a perception that the policy is developer led and that there is a need for more control and tools at a local level to provide a more balanced approach.

Council considers that the protection of heritage areas and clear policies on preferred neighbourhood character should be respected by the State Government if they have strong local community support.

6. What are the Council's M2030 priorities for the next 5 years?

There are a number of local initiatives for which Council is seeking State Government support.

The Council wishes for the Major Activity Centres to be recognised as important places for respectful and appropriate levels of development which reflects the vision of each centre as outlined in the Major Activity Centre Structure Plans.

Council is currently seeking the Minister to support Amendment C58 to the Bayside Planning Scheme to allow the Amendment for the Major Activity Centres to be placed on exhibition. Following the completion and adoption of the Structure Plans for each of the four centres Council is committed to the implementation of the Structure Plans as required under M2030.

Council is seeking appropriate tools to ensure that development respects the existing local amenity and character.

Council is seeking to continue the drive for greater emphasis on sustainability and environmentally sustainable building design. Without clear leadership from State Government on this issue Council is expecting to continue to seek implementation of provisions in the Planning Scheme to address the current gaps in local policy.

In particular Council priorities also include:

- The need for improvements to the public transport system in Bayside. Without the provision of a suitable alternative public transport system for local residents there will continue to be high demand for car use and limited opportunities for Council to provide additional car parking without major capital investment. In addition the high demand for car use is in direct conflict with the desires of the Council to encourage sustainability at a local level.

- To carry out improvements to overloaded infrastructure. The pressure of further development brings greater demand on services, facilities and infrastructure which requires upgrading. With financial constraints and concern over the financial sustainability of Bayside the cost burden of improved infrastructure is of great concern. Council is currently seeking ways in which this may be funded. There are proven difficulties in introducing Development Contribution Plans, for example. There is also a lack of State Government

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support and expenditure on infrastructure in established areas such as Bayside.

- The concern over loss of open space and the lack of sufficient open space to cater for the needs of a growing population. There is a need for appropriate levels of funding to ensure open space can be maintained and expanded to meet demand; especially in a climate of high land value which has seen privately owned open space (bowls, croquet, tennis clubs) sold for development.

- The protection of trees and vegetation in Bayside to ensure the character and environment are not degraded. Higher density development and increased site coverage is limiting opportunities for large scale replanting, and is heavily reliant on the 'borrowed landscape' for occupant's amenity.

- The completion of a clear housing strategy that reflects the desires of the community and allows for higher density housing only where it is well designed and respects the neighbourhood character.

- To enable a high level of access for disabled residents, visitors and workers in Bayside to improve quality of life and ensure equitable access.

- An integrated mobility strategy, rather than separate approaches for the individual components of mobility.

7. What should the State Government priorities be?

It is acknowledged that the State Government has an over-riding role to play in the setting of planning policy and that local governments are obligated to follow this policy.

However, it is argued by many that local governments, including their democratically elected representatives, are the best placed to implement State Government policy at a local level and in a manner that best matches the aspirations of their communities. The distinction in roles should therefore be that the State Government sets broad strategic macro direction, with local government having the capacity to determine how this is implemented at a local level. This requires a greater respect for the rights of local governments to create and apply appropriate local policy, provided that the objectives of the State Government are being met.

It is Council's view that the State Government should be taking the lead on affordable housing for the 60,000 people who move to Victoria every year, with an emphasis on affordable, in a way that does not compromise our existing residential amenity and at the same time provide public transport and other much needed infrastructure for them. It is suggested that a model medium density development on a greenfield site be developed to promote housing affordability, sustainability and urban consolidation. The Government may need to intervene in directing development to appropriate areas where affordable housing can be provided. The Government may want to consider a program to encourage developers to provide rental accommodation.

The Government should focus on a quality built environment on the fringe of metropolitan Melbourne that is as well serviced as the inner city.

There is a need for Government to make major investment into infrastructure, in particular public transport to assist in the delivery of M2030. Development should follow infrastructure and not vice versa. There should be a clear look at the potential of the principal road network for development.

Council is seeking that the State Government become visionary and not reactionary to emerging issues. ie. Development should follow infrastructure and sustainability matters such as climate change still need to be addressed at a state level.

Council agrees that maintaining the green wedges and the Urban Growth boundary should be a high priority of State Government.

8. Other key issues/general comments

Melbourne 2030 was supposed to deliver on issues of Affordable Housing however this has not been the case. Is M2030 therefore ineffective in the delivery of affordable housing? What mechanisms have been put in place to address this issue?

The economic impact of Melbourne 2030 has not suitably been assessed. There is a need to track the economic impacts and regular reporting back to local government?

Why is there a continued move, for instance, on change and increased density when housing targets are being met? If we are achieving State objectives why cannot councils have local self-determination on the means by which they are to be achieved. Decisions at a local level to reflect local policy should be respected.

There are major public transport issues for Melbourne and a need to integrate and provide for adequate public transport to meet the demands of the growing suburban population. Without improvements in public transport growth of centres cannot be supported.

There is some confusion over the responsibilities of supplying commuter parking around railway stations. This should be provided by

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State Government as supporting infrastructure to encourage greater useage of public transport.

Council considers that the Government should act promptly to address the flaws in the current policy and not spend additional time drafting further policy.

There has been a very large cost to Council in preparing Structure Plans for Major Activity Centres as required by M2030. Council has spent over \$300,000 to date (plus extensive staff time) in the preparation of the plans and has allocated an additional \$160,000 for the implementation of the structure plans through a Planning Scheme Amendment process. The equivalent of almost two full time planners is spent on this project with additional significant involvement of other staff. In addition the need to invest in activity centres for improvements and upgrades to infrastructure is expected to be of high cost to Council.

Executive Summary

1. Executive Summary

Council is generally supportive of the principles of the Metropolitan Strategy, and has been since it was announced in 2002.

Council however, is concerned that the emphasis to date has been on achieving a concentration of high density activity around activity centres, with little apparent regard for local policy; policy which provides for meeting metropolitan objectives, but in a manner attuned to local circumstances, opportunities and expectations.

Council has expended significant energy and resources on structure planning. It has seen little evidence of a coherent, whole of government approach to issues such as infrastructure capacity or comprehensive transport (mobility) planning to address and ameliorate the implications of intensification.
