EXECUTIVE SUMMARY


1 INTRODUCTION

1.1.1 Corporate Plan compatibility

1.1.2 Sustainability Implications

1.1.3 Community Plan

1.1.4 City Plan

1.1.5 Whitney Committee Report Recommendations

1.1.6 Approach to response

2 INNER REGION

2.1 Population Capacity Study

3 HOUSING

3.1.1 Transition Areas

3.1.2 Growth

3.1.3 Households

3.1.4 Mobility

3.1.5 Neighbourhood Character

3.1.6 Local housing strategies

3.1.7 Affordable Housing

3.1.8 Achieving affordable housing

3.1.9 Housing adaptability

3.1.10 Sustainability Scorecard

3.1.11 Possible blockages to successful regional housing working group outcomes

4 ACTIVITY CENTRES

4.1.1 Activity Centre Boundaries

4.1.2 Activity Centre Network

4.1.3 Out-of-centre Development

4.1.4 Implications of growth in and around activity centres

4.1.5 Compatibility of uses within centres

5 INTEGRATED TRANSPORT

5.1 Integrated Transport Implementation Plan (6)

5.1.1 Funding

5.2 Public Transport

5.2.1 Integration

5.2.2 Social Equity - cheaper tickets

5.3 Roads

5.3.1 Congestion pricing

5.3.2 Parking

5.4 Freight

6 INDUSTRY

6.1 Public Open Space

7 DIRECTION 7 A GREENER CITY

8 Physical Infrastructure/Capital Works

9 Monitoring

10 Better Planning Decisions & Careful Management

11 NEW TOOLS

11.1.1 Structure Plans
Executive Summary

Introduction
1. This Strategy is welcome as it represents a significant commitment by the State Government toward regional urban issues being managed by Local Government. It is hoped that its implementation will follow with a similar level of commitment to its development and aim to work in partnership with Local Government and the community.

2. The Corporate Plan and Council's current policy framework demonstrates that there is a high level of compatibility with the key directions set out in Melbourne 2030.

3. The City of Port Phillip is the second fastest growing municipality, behind the City of Melbourne, in the inner metropolitan region. Council has experienced a 9.7% growth rate in population and an even higher increase of 19% in the number of dwellings over the last census period.

   This highlights that a substantial increase in dwellings does not lead to a corresponding increase in population due to the strong trend of declining household size. This will be an increasing problem for the City of Port Phillip in wanting to maintain a sustainable population base while not significantly building out the municipality.

4. Located in the inner region the City of Port Phillip has unique combinations of land uses and assets not seen in other municipalities. The foreshore and bay area, are Melbourne’s playground and with other regional assets such as Albert Park reserve, bring substantial visitors and added complexity to municipal management.

5. Council is already pursuing most of the initiatives outlined in the strategy and making progress on many fronts. It however requires effective support and assistance to achieve many of the strategic outcomes sought in both the local planning policy base and the Melbourne 2030 Strategy.

Whitney Committee
6. Recommendations in the Whitney Committee Report noted that there should be planning “tools” that allow Council to achieve its strategic intent. The key points of the Whitney Committee Report are supported and these need to be urgently embraced by the State Government and included in the implementation phase of Melbourne 2030. The key points are:

   i. Create greater levels of consistency and certainty in decision making through greater clarity and precision in policy statements;
   ii. Provide more guidance in balancing policies;
   iii. Clarify the status of local policies outside planning schemes in decision making; and
   iv. Improve the quality of clarity of both State and Local policy
Inner Region
7. In order to better understand each municipality’s part in achieving the forecast for the inner region, a joint approach was adopted. The cities of Melbourne Yarra and Port Phillip jointly commissioned consultants FDP Savills to review the forecast 90,000 dwellings and the methodology used to arrive at that number of dwellings. This exercise was to ascertain what proportion of growth each municipality might be capable of accommodating having regard to existing trend data, local characteristics and current planning scheme controls.

8. Council believes it will be able to accommodate the additional dwellings required to meet the forecast 90,000 for the inner region. Council however, believes that there may not be the demand for the full 90,000 as suggested.

Housing
9. Port Phillip is under increasing additional development pressure, compared with other inner region municipalities, due to its proximity to the CBD and Bay. It is Council policy, in seeking to manage the complexities of an inner city municipality, to direct the majority of future residential growth to activity centres and that outside activity centres be only incremental growth and infill development.

Further, it is Council’s firm opinion that not all sites are suitable for redevelopment or infill for a range of reasons including heritage, neighbourhood character and the maintenance of the liveability of local neighbourhoods.

10. Council has also identified two other precincts (that do not conform to the theoretical activity centre model) that are currently in transition and have the potential to take additional residential growth. These are the Inkerman / Barkly Streets Precinct which requires the preparation of a preferred character statement and also the St Kilda Road Precinct.

Neighbourhood Character
11. Neighbourhood Character is a key issue for Council. The protection of neighbourhood character is as legitimate a reason for control, as is heritage. Planning for housing is intimately linked to neighbourhood character and is therefore a fundamental aspect for how the Strategy is implemented. Local government should be able to determine where the increased intensity is to occur as it knows the local circumstances well and can plan for it in an integrated manner.

12. Planning controls similar to the Heritage Overlay (including demolition controls) are required that allow Council to better manage insensitive responses to character and replacement buildings in order to maintain the liveability and special character of areas. In addition, Council needs the ability to manage the intensity of development in heritage overlay areas eg. scale, siting, building bulk. Planning controls that allow Council to manage intensity, housing type and in-fill subdivision patterns are also required as a priority.
13. Local government should be able to have some aspects of policy for neighbourhood character and heritage that are not negotiable so that certainty is increased for stakeholders and municipal areas managed to strategic outcomes.

**Local Housing Strategies**

14. Local Housing Strategies (LHS) are strongly supported – Council is already in the process of preparing a strategic document to provide further support to Council’s current policy position. This LHS will include some direction on locations that can accommodate additional growth and reflect an identified preferred character. The LHS will also identify areas where additional growth will significantly impact on the neighbourhood character or heritage significance. The LHS should seek to steer development to appropriate locations and promote design outcomes that are sympathetic and responsive to neighbourhood character.

15. Further, once a Local Housing Strategy has been developed and incorporated into the Planning Scheme, Council should be supported in its role of decision-maker on where and how much housing is required to meet the forecast 90,000. This is consistent with recommendation 5 of the Whitney Committee Report (page 20) that once policy is gazetted it should not be undermined.

16. The Regional Housing Working groups are supported but must be resourced and have a level of agreement and commitment to the scope of issues, agenda and implementation of action plans that are produced by the groups. As a starting point each group should be required to develop a regional housing statement. The Department of Sustainability and Environment should provide a framework for these groups to be established including Terms of Reference and timeframes to produce outcomes. Strong leadership of this group is required so that a program is followed with implementable outcomes.

**Affordable Housing**

17. Local Government should be encouraged at a minimum to play a role in the provision of affordable housing. This role may vary to suit each municipality’s need. There should be a proportional target for the provision of affordable housing set across the metropolitan area and for each municipality.

**Housing type and adaptability**

18. Council believes that it is not sustainable to provide dwelling stock that only caters for one or two person households. Additional controls should be developed to provide local government with the ability to require greater diversity in house design and type to promote flexibility within the house to accommodate a variety of household types for future needs.

19. The ability to plan and manage the supply of household types is also a key issue for Council so that it can provide the required housing diversity for its community and ensure choices of housing for the lifecycles of its residents (that is, maintaining a sufficient array of housing stock in localities that suits household needs to enable people to move within their suburb (as need be) and stay connected to the community)
20. Sustainable design measures (water usage, building materials etc) beyond the four star rating system should be a fundamental requirement in all new development. Some mandating of simple techniques should occur to cause their use to become mainstream and accelerate the “smart” housing elements.

Activity Centres
21. The City of Port Phillip agrees with the four major activity centres in the following locations:
   i. Balaclava (Carlisle Street)
   ii. Port Melbourne – Bay Street
   iii. South Melbourne (Clarendon/Coventry Streets)
   iv. St Kilda (Fitzroy and Acland Streets)

22. Given Council’s proven ability to manage growth within its existing strategically established policy base, the State Government should support Council in decisions about managing growth and development in the City of Port Phillip.

Activity Centre Boundaries
23. Local government should be able to determine the logical boundaries for defining each activity centre. The suggested 400m radius is simplistic and seen as a notional sphere of influence only and not necessarily applicable to all activity centres. Boundaries and ‘spheres of influence’ must be clearly identified through good structure planning.

24. How activity centre boundaries are to be recognised in the planning scheme and applied from a statutory point of view is a matter that clearly requires resolution.

25. Council does not support the implication that neighbourhood centres be considered as strategic redevelopment sites.

   In the City of Port Phillip consideration of neighbourhood centres would mean large swathes of the municipality would be up for redevelopment which Council believes is not the intent of the 2030 Strategy. If this were the case, the fabric of many residential neighbourhoods in the inner region which are highly valued for their intrinsic character and heritage would be threatened. It would also continue the decline of larger housing stock to the broad community which has longer term implications for housing communities over peoples lifecycle.

   Council seeks clarification from the State Government on this matter, and support for our existing neighbourhood policy, designed to acknowledge and manage this tension.

26. The model of increased densities in and around activity centres is already demonstrated in the existing urban structure of Port Phillip. Bay Street, Port Melbourne, and Fitzroy Street, St Kilda, illustrate that Council has been following the broad thrust of 2030 for many years. Local government is best placed to decide how the model is applied.
27. Council is about to start preparation of an Activity Centre Strategy for the municipality to provide strategic direction for its retail centres including neighbourhood centres.

28. Each of the four identified major activity centres clearly requires a structure plan to be developed. The structure plan will follow the format set out in the strategy and be adapted to suit local needs including the logical boundaries of the activity centre.

29. In order to best manage growth and change in and around activity centres additional tools are required to assist Council refine the fine grained land uses and built form to protect neighbourhood character, local amenity and the functionality/role of each centre. For example, existing controls do not allow for proportional management of land uses to maintain diversity, achieve a full range of services and to avoid any one use being dominant within an activity centre (such as restaurants in Fitzroy and Acland Streets which reduces convenience shopping and neighbourhood services.)

30. Appropriate tools are also required to better manage a range of uses within activity centres that may have different amenity expectations eg. residential uses in close proximity to entertainment venues and noise generation issues. Council should be able to require new uses in activity centres to bear some responsibility for noise attenuation measures and to have the appropriate design to avoid noise issues.

31. Council has already demonstrated a strong commitment to achieving the goals of 2030 as evidenced in the work undertaken in Carlisle Street (preparation of a Framework Plan with Traders) and introduction of community housing adjacent to the Balaclava Station. This project should be included in the Transit Cities Program.

32. Council has also identified the South Melbourne East Precinct, which contains the Clarendon Street activity centre, as an area that is under development pressure and requires a Structure Plan and Urban Design Framework (UDF) to give direction, guide future decision-making and development of the area. Resolution of a Structure Plan and UDF for this complex inner urban Precinct will be fast tracked through Council and should be a demonstration project under the 2030 banner similar to Transit Cities.

Out-of-centre development

33. The impact of out-of-centre development is different in the inner region compared with other suburban sites. Land values are such that a more intensive use of the site is required to ensure a suitable return. This increases the pressure to yield to what is seen by the market as the current best and highest use, which history has shown to be problematic.

34. As part of the out-of-centre considerations the State Government should clarify what is meant by the concept of net community benefit and put measures in place to ensure it is applied consistently by all statutory bodies.

This should include wide considerations and may also need to include some differentiation for inner city areas compared to suburban areas due say to accessibility and lot size differences for instance. That is, new generation designs
that suit the inner city urban fabric should be encouraged rather than simply enabling box style retail to occur in any circumstances.

35. It is agreed that criteria for out-of-centre development are needed providing their aim is to "concentrate activity in activity centres". The development of criteria is a high priority as the development pressures for this type of use is immediate. The City of Port Phillip would welcome the opportunity to be a test case and to work in partnership with the State Government to prepare the assessment criteria.

Integrated Transport

36. Port Phillip is a highly urbanised area and has considerable congestion in peak hour and also has major carparking difficulties in many precincts. Further intensification of activity centres will require significant improvements in alternative transport (including walking) to be able to provide good accessibility and livability in these centres.

The State must recognise that car based transport reliance in the inner region is simply not sustainable and must strive to generate modal changes in a proactive manner.

37. Port Phillip is a major business and tourist destination in its own right and is also a conduit for significant commuter traffic driving to or through the central business district. Alternative means of transport need to be encouraged to avoid the impacts of congestion on the inner region municipalities.

38. Port Phillip has spent considerable energy on understanding transport issues in the inner city area. It is substantially into the process of developing integrated transport policies which are aimed at reducing the impact of the motor vehicle on Port Phillip through:

   a. Providing walking, cycling and public transport choices that are competitive with driving for convenience and quality;
   b. Protecting the competitive advantage of walking, cycling and public transport through appropriate urban design, enforcement and safety initiatives;
   c. Providing information that will help people use the choices in a way that is appropriate to their lifestyle.

39. It is clear that by conducting strategic reviews and integration studies that public transport enhancements can be found. These initiatives should compete with road funding proposals rather than simply public transport funding. Further, some State transport funding should be provided for to allow for initiatives determined through these strategic reviews.

Inner urban areas should not be neglected in transport funding as modal improvements in these areas can often be made with minimal funding.

40. Port Phillip also interfaces with the Port of Melbourne and as a result is subject to considerable freight movement. Much of this freight drives along Beach Road, spoiling what should be a magnificent natural asset, or through older style residential areas to the detriment of the residents’ quality of life.
41. Although of a very general nature, the actions in the Integrated Transport Implementation Plan 6 are consistent with Port Phillip's objectives at the broad level, with the exception of more freeways and road space development.

42. In order to achieve the desired outcome the State Government must demonstrate that funding will be made available for significant public transport infrastructure works as is required by the State of local government.

In short, a forward capital works program should be made available so that local government can better understand the integrated program.

43. State Government needs to focus on more efficient routing and connections plus minor infrastructure improvements to increase the rate of public transport usage in inner and middle suburbs.

Industry
44. The City supports a significant industrial area located close to port facilities and major arterial roads network. These features need to be recognised as assets and not diminished through over development or poor strategic responses.

45. Industrial areas in the City of Port Phillip are under threat from development pressure to more intensively use large land holdings. This raises the threat of sub-division to smaller lots to allow non-core industrial or other uses.

46. Council wishes to maintain this metropolitan resource that is in close proximity to the ports, freeways and the CBD. The State Government should support the Council in this initiative due to the metropolitan significance of this industrial precinct.

Infrastructure
47. Development contribution plans should be facilitated as a mechanism for achieving the necessary redevelopment of infrastructure created by the intensification of land uses across the metropolitan area.

48. Council is paying the cost of maintaining spaces that are of metropolitan significance. Although not a poorly serviced region the need for infrastructure support is no less in the inner region. It is important to maintain and improve these facilities and State Government assistance will be required for some of these aspects.

Environment
49. The Foreshore, Bay and Albert Park Reserve serve as significant public open spaces on both a local and metropolitan level and contribute to Melbourne’s liveability. This limited space is essential as a recreation opportunity for an increasing highly urbanised inner city population. These need to be maintained and improved as key elements of open space in the inner city region to provide recreational space for residents and in particular for apartment dwellers.

Any opportunity to increase open space in the inner region should be embraced as a fundamental parallel to increased residential densities.
50. The State Government should include the City of Port Phillip in any significant decision-making regarding the management of the Bay, Foreshore, Albert Park Reserve as key open space areas.

51. It is important for the greater good of Melbourne that the Green Wedges are protected.

52. Council recognise the link between increased residential intensification and the maintenance / enhancement of inner public open spaces and the protection of the Green Wedges.

Clause 12

53. Most directions and policies within Clause 12 are in line with or neutral to the Local Planning Policy Framework in the Port Phillip Planning Scheme.

54. One of the key issues for implementation will be the weight given to each Policy. The State need to ensure that equal weight is given to each policy otherwise there is the risk that certain policies will dominate others such as has been the case with the previous urban consolidation clause in the scheme.

55. The Whitney Committee recommendations must be fundamental in the finalisation of the statutory provisions of Clause 12.

Monitoring

56. Collection of data and monitoring change will be required to allow adjustments to local policy directions that are more locally responsive.

57. A clear message from 2030 is the need to give more attention to the collection of data in an agreed standardised format to assist in the management and monitoring of changes and growth. Council will be establishing a centralised and standardised methodology for data collection.

Implementation (Tools)

58. Council believes that clear Implementation Plans are essential for the Strategy to be realised. However the initiatives in the three key plans (Housing, Activity Centres and Integrated Transport) that affect Port Phillip do not integrate or cross reference well.

59. An example is the overlap of similar actions in the Implementation Plans for Activity Centres and Integrated Transport. As the wording is slightly different, what are basically the same actions could be approached in a different way.

60. There is a high level of commitment by the State Government to undertake a large quantity of priority initiatives in the short term and it is questioned whether it has the resource capacity to adequately implement these initiatives. Council encourages the State Government to adequately resource these initiatives, as delivery is critical.
61. There is a need to better coordinate strategic planning outcomes across municipal borders and regionally. The mechanisms that will assist and facilitate a coordinated approach need to be developed eg. establishing dedicated working groups with neighbouring councils in relation to shared issues.

62. The City of Port Phillip work program covers most of the 2030 Directions and is well underway in preparation or implementation. For these to be able to be achieved State Government must provide:
   i. Leadership
   ii. Funding and resource assistance
   iii. Complete nominated actions
   iv. Promptly provide guidelines and frameworks for actions
   v. Review and enhancement of statutory tools available for implementation.

If these are not delivered then Council will be held back in pursuing and achieving the Melbourne 2030 outcomes.

63. In this regard, Council requires additional tools to ensure that it is best able to manage change in a complex inner region in a more sophisticated manner. In particular the ability to manage growth in a staged approach is required and to maintain and improve the liveability rather than it being progressively eroded.

64. Local Government has a vast array of programs and resources that need to be funded according to local priorities and budget constraints. Planning fees only recoup some 35-40% of the statutory planning function costs. Most metropolitan council’s planning departments are pressed for resources. A simple means of providing additional funding for local government, with no additional cost to State Government, is to increase the fees required for planning applications.

Conclusion


66. Melbourne 2030 is a good starting point but effective implementation is critical, as otherwise it will not achieve the identified goals.

67. The real implications of Melbourne 2030 for local areas will depend upon the interpretation and application through detailed planning and decision making.

68. The inner region should be adequately resourced and funded with strong mechanisms to ensure critical matters are progressed and implemented (eg working groups with strong charter and effective leadership.)

69. Council seeks a partnership approach to implementing its work program and believes it can offer to the State Government practical assistance and knowledge gained through experience.
70. The host of initiatives and action plans within the Strategy demonstrate that actions are required in many fronts. The Strategy and initiatives rely heavily on local government resources to implement them. However local government resources alone will not achieve all the actions nominated. There must be an equivalent commitment from the State Government in the form of funding for the inner region as suggested for other regions. This is critical for the integrated transport initiatives in particular.

71. The City of Port Phillip believes that the bulk of the Strategy Directions are in line with much of the existing policy framework of Council. Some finetuning will be required to better align but this can be achieved through the implementation program.

72. Throughout this response Council has demonstrated a high level of commitment to the Strategy and its implementation. However to achieve the end results Local Government must be further empowered and provided with tools to be able to implement, progress and manage the collective whole.

73. Council has provided a preliminary indication of how this might occur as listed actions and the commitment to prepare a dedicated 2030 implementation plan.

74. In implementing the 2030 Strategy local neighbourhood liveability must be maintained and enhanced so that the valued elements are not slowly eroded, particularly in the inner region where intensive activity and less intensive residential uses are adjacent.

75. The challenge is therefore to have the required tools to be able to achieve and realise stated visions, objectives and outcomes of 2030 and the Local Planning Policy Framework. Council’s must be empowered and have enabling tools to be able to manage the whole municipality and the interwoven web of its component parts. The Victorian Planning Provisions therefore require change to be able to make this happen.

76. The process of implementing the Strategy should be one that is both integrated and iterative between state and local government and other stakeholders. Council is very keen to participate in these processes as it has valuable experience to offer.
1 Introduction

Melbourne 2030 is based on accommodating population growth over the next thirty years in a sustainable manner. It provides strategic directions and actions to achieve this result. This Strategy is welcome as it represent a significant commitment by the State Government toward regional urban issues being managed by local government. The Melbourne 2030 Strategy has been developed after a lengthy consultation process with the community. It is hoped that its implementation will follow with a similar level of commitment to working in partnership with local government and the community.

Clearly the Strategy and its Implementation Plans should be read and considered as a package. This response comments on the Directions, and Initiatives as well as the Implementation Plans. This response is the result of officer review and analysis against the current Council policy framework. It provides a brief description of the direction, a discussion of the impact on Council service delivery, systems and operations. This response also outlines a range of actions Council will undertake to ensure that the 2030 strategy is implemented across the organisation. Highlighted in this response are recommendations to the State Government about how various initiatives and listed actions could be amended to better meet the needs of the inner region or improve the implementation. This response also highlights existing areas of concern that Council faces in its application of the statutory planning framework (consistent with Melbourne 2030) and thus the achievement of strategic directions.

Port Phillip City Council has a strong history of working in partnership with the State Government. The successful implementation and achievement of the Melbourne 2030 goals will depend on the continued support from local government and many projects will require a partnership approach in order to overcome many of the barriers faced at a local level; those barriers being predominantly the statutory tools available, legislative limitations and the cost of additional and improved infrastructure.

The introduction of the Melbourne 2030 strategy is also timely as it provides an opportunity for Council to promote local strategies that are also applicable to neighbouring municipalities eg. a regional based Integrated Public Transport strategy, environmental and social initiatives. There is also the opportunity for the State Government to play a facilitation role in many issues.

This response represents Council’s position on the policy presented in the Melbourne 2030 strategy and therefore will be used the consideration of development applications. This response will also be available to the community.

Port Phillip is a vibrant and diverse city with high levels of employment, industrial areas close to a major port, and state significant tourism and recreational assets, as well as cultural facilities of national importance. The Directions outlined in the Melbourne 2030 Strategy are in line with Council’s main direction of “Pillars of Sustainability”. The concepts of sustainability and service are concepts that are at the foundation of Council’s philosophy and are the key drivers for the daily function of the organisation. These two concepts are linked by the four...
pillars of sustainability: economic viability, environmental responsibility, cultural vitality and social equity.

Under each Pillar there are several objectives that Council wants to achieve. Each pillar has prescribed outcomes and identifies strategies to achieve them. Each of these has been reviewed against the Directions and Key initiatives in 2030 to check for compatibility.

1.1.1 Corporate Plan compatibility

The following table shows the strongest links to the Corporate Plan 2002-2006 and demonstrates that there is a high level of compatibility between Council’s objectives and the key directions set out in Melbourne 2030.

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<tr>
<th>Directions</th>
<th>1 Economic Viability Pillar</th>
<th>2 Environmental Responsibility Pillar</th>
<th>3 Cultural Vitality Pillar</th>
<th>4 Social Equity Pillar</th>
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<td>1. A more compact city</td>
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<td>2. Better management of metropolitan growth</td>
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<td>3. Networks with the regional cities</td>
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<td>4. A more prosperous city</td>
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<td>5. A great place to be</td>
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<td>6. A fairer city</td>
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<td>7. A greener city</td>
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<td>8. Better transport links</td>
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<td>9. Better planning decisions, careful management</td>
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Some additional work will be required to ensure that the revisions of the various components (Melbourne 2030, Council’s corporate plan and community plan and local policy) occur in a manner that allows one document to inform the next in its development.

The Corporate Plan 2002-2006 is set on a four year program and is due for review 2006. The Corporate Plan represents a four pillar approach and provides a sustainable framework in which Council can deliver its services.

As Council proceeds with the update of the Community Plan, the finalisation of the Corporate Plan and its review of its Municipal Strategic Statement, reference to Melbourne 2030 will be able to be strengthened.

1.1.2 Sustainability Implications

The following provides a short analysis of the good compatibility of Melbourne 2030 against the Council’s four pillars of sustainability.

Social Equity Pillar
The Melbourne 2030 Strategy adopts **Equity** and **Inclusiveness** in a set of principles for the strategy. This is expressed through the desire to increase the supply of affordable housing and in the consideration of the differing needs, values and aspirations of the community and integrating these into the planning system.

**Economic Viability Pillar**

The principle of **Innovation** supports this pillar through promoting entrepreneurial skills that encourage growth and development while considering creativity, cultural vitality and intellectual capacity.

**Environmental Responsibility Pillar**

The principle of **Sustainability** and its core objectives of:

- Safeguard the welfare of future generations;
- Improve equity within and between generations; and
- Protect biological diversity and maintain systems essential to support life;

provide good compatibility with the Council environmental pillar.

**Cultural Vitality**

The ideas of leadership and developing partnership approaches to the implementation of the strategy encapsulate the cultural pillar.

This clearly demonstrates that the four Pillars of Sustainability are a suitable model adopted by Council through which to implement the State Government broader policy directions at a local level.

**1.1.3 Community Plan**

A review of the Community Plan is currently underway and will assist Council in determining its future priorities based on the agreed directions identified in the original Community Plan 1997. As Melbourne 2030 has been released during this process, a background discussion paper refers to Melbourne 2030 as a challenge that Council will need to address.

**1.1.4 City Plan**

It has been recognised that an overall strategic document is required to provide direction for the spatial application of Council’s policies. This document is the source of issue identification and strategies to address these issues. The formulation of this document is planned in the future work plan and will be informed by the Community Plan and Corporate Plan and also be linked to the Municipal Strategic Statement Review.

**1.1.5 Whitney Committee Report Recommendations**

The Whitney Committee recommendations (paper #1) states that the Victorian Planning Provisions should be modified to improve the clarity and certainty of local policy. It further recommends that once the Municipal Strategic Statement (MSS) is gazetted (and hence assumed to be in line with State Policy) that the State Planning Policy Framework relating to general planning direction does not apply and that only the specific elements relating to particular provisions with State significance (eg brothels) apply. See Whitney committee paper #1.
The logic of this is important to the implementation of the Melbourne 2030 Strategy. That once the inherent inconsistencies of state and local aspirations and policies have been resolved by the approval and gazzettal of the MSS or amendment to it, then the State policies should no longer be the key driver. Rather, the MSS as a reflection of the balance that has been struck between the State imperatives and the local aspirations should become the principle document.

1.1.6 Approach to response
Not all parts of the strategy are directly relevant to the City of Port Phillip. The parts that will directly affect Port Phillip are:

- Melbourne 2030 Strategy (core document)
- Draft Activity Centres Implementation Plan 4
- Draft Housing Implementation Plan 3
- Draft Integrated Transport Implementation 6
- Implementation in the Planning System

Amendment VC16 introduces four new Ministerial Directions;

- Ministerial Direction No. 9 – Metropolitan Strategy
- Ministerial Direction No. 10 – Urban Growth Boundary
- Ministerial Direction No. 2 – Werribee Growth Area
- Ministerial Direction No. 3 - South Eastern Growth Area

Of the four Directions only Direction No. 9 directly affects the City of Port Phillip.

2 Inner Region
Port Phillip Council is an inner metropolitan municipality and nominated as part of the inner region. The suggested implementation actions for the surrounding municipal areas and fringe areas will have an impact on the municipality. For example, much of the traffic on major arterial roads through Port Phillip is generated from outside the municipality. Comments provided by the City of Port Phillip should also be read in the context of all its neighbouring municipalities and its location in the metropolitan area.

The nature of the inner metropolitan region, as nominated in Melbourne 2030, is one of many layers and complex issues. This often requires solutions that are more detailed in the process and consideration of issues to ensure that a good outcome that meets numerous needs and criteria is achieved. In some cases this will require more detailed consideration and perhaps a different approach than might be used in a middle-ring or fringe locations.

These complex issues include the established urban fabric and natural assets including the Yarra River and Port Phillip Bay. The City of Port Phillip is charged with managing such an environment and requires support in the form of state government resources and funding assistance. The resolution of issues on the fringe should not be at the expense of those in the inner region.

The inner region is clearly critical to Melbourne. More recognition of the role that this region plays in the context of metropolitan Melbourne apart from the central city functions is required. It has a range of distinct neighbourhood characters, precincts and assets that significantly contribute towards Melbourne’s liveability. In identifying the inner region, some of the initiatives of Melbourne 2030 will need to be adjusted to meet the different issues
encountered in the region. It has already undergone considerable change that has accelerated over the past 5 years. Further change, unless well planned and tightly managed, will put at risk the liveability and neighbourhood character if Council is not supported more strongly in its management.

2.1 Population Capacity Study

The inner region identified in Melbourne 2030 was forecast to accommodate an additional 90,000 dwellings over the thirty year timeframe. The Melbourne 2030 Strategy does not give a breakdown of the forecast other than at a regional level.

In order to better understand each municipality’s part in achieving the forecast for the inner region, a joint approach was adopted. The cities of Melbourne Yarra and Port Phillip jointly commissioned consultants FDP Savills to review the forecast 90,000 dwellings and the methodology used to arrive at that number of dwellings. This desktop exercise to was ascertain what proportion of growth each municipality might be capable of accommodating having regard to local characteristics and current planning scheme controls. This involved two tasks:

1. Review the proposed forecast dwelling figure of 90,000 for the Inner Region.

The consultants reviewed the rational and methodology used by the Department of Sustainability and Environment (DSE) in arriving at the forecast 90,000. It is understood that this is the median figure of three projected forecasts. The consultants suggested that the forecast should be changed by reconsideration of two critical assumptions formatted into the DSE customised matrix of within-state migration that may have a large impact on population figures for the inner region.

The most pertinent relates to the Baby-Boomers propensity to migrate to the inner region. Unlike the Department of Sustainability and Environments, assumption that a great many empty nesters will move to the inner city upon retirement, the consultants put the notion that; ‘given the likelihood that Baby Boomers will not be able to adequately fund their retirement, it is fair to assume that Baby Boomers will liquidate their metropolitan housing in preference for cheaper accommodation outside the metropolitan area, banking the house price difference to fund their lifestyle’. The Consultants do, however, acknowledge that, ‘to date there is no evidence of this trend and it remains an unsubstantiated hypothesis’.

Given the substantial size of the Baby-Boomers demographic cohort in proportion to the entire population, their migration patterns would have a significant impact upon the total future population size.

The other critical factor that has not been given due consideration in DSE’s customised matrix of within-state migration relates to the traditional occupiers of inner city dwellings (18 to 43 year old). Declining fertility rates and an aging population suggest that the size of this demographic cohort is forecast to decline. This shall, therefore, impact upon the population size and composition of the inner region.

2. Council’s ability to accommodate increased densities.
The Consultants were also requested to undertake a desktop exercise to test the likelihood of the 90,000 dwellings being accommodated within the thirty-year timeframe. The study estimates the City’s of Port Phillip, Melbourne and Yarra have the ability to accommodate the forecast 90,000 additional households. It does not, however, specify a time-frame(s) at which these households may be accommodated.

The break-down for Port Phillip is as follows:

<table>
<thead>
<tr>
<th>Category</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Currently under construction</td>
<td>3,514</td>
</tr>
<tr>
<td>Planning Stage</td>
<td>6,515</td>
</tr>
<tr>
<td>Currently mooted</td>
<td>1,450</td>
</tr>
<tr>
<td>Future potential</td>
<td>6,035</td>
</tr>
</tbody>
</table>

It is estimated that the City of Port Phillip can comfortably provide an additional 17,514 dwellings.

The methodology utilised to determine capacity for each municipality was based on a small area approach. Consideration was given to existing planning policies and controls and the aggregated results of existing/mooted developments. Major Activity Centres and Neighbourhood Activity Centres were nominated as small areas for the study of Port Phillip. The Study did not, however, consider the 89/11 ratio suggested in the Housing Implementation Plan for the direction of future housing inside and outside of Major Activity Centres respectively.

The consultant’s report represents a second opinion and highlights the difficulties in forecasting for such a long period into the future. It is important to consider other interpretations of trends from other key stakeholders including the Housing Industry Association. For Local government to be expected to make a large commitment of current resources to provide infrastructure a comprehensive population forecast is required. It is essential that the Melbourne 2030 implementation is closely monitored and that adjustments are made regularly to ensure that decisions are informed by current trend analysis.

3 Housing

Council supports a long term forecast for metropolitan Melbourne. There is value in looking well into the future but this does represent a significant change in timeframe from previous practice for consideration, planning and implementing a metropolitan strategy.

Council has a strong policy base with regard to the housing sector and is one of the biggest providers of community housing. The City of Port Phillip has experienced a significant amount of residential dwelling growth over the last census period. This has resulted in 8,674 additional dwellings in the municipality since 1996 (census data) in relation to a population increase of 7,065 persons.

There is an imbalance between dwelling supply and population growth due to the declining household size. Using an increase in population as the only driver needs to be carefully assessed.
This is a key point because in order to maintain a stable population level, a continual supply of dwellings, at a higher rate than the population growth rate must be achieved to counter balance the trend of declining household size.

There is a considerable overlap between the issues of housing and activity centres for the City of Port Phillip. The provision of residential growth in and around activity centres is closely aligned to existing policy, which also supports housing along public transport routes.

Port Phillip is under increasing additional development pressure, compared with other inner region municipalities, due to its proximity to the CBD and Bay. It is Council policy, in seeking to manage the complexities of an inner city municipality, to promote the majority of future residential growth to activity centres and that outside activity centres be only incremental growth and infill development. Further, it is Council’s opinion that not all sites are suitable for redevelopment or infill for a range of reasons including neighbourhood character, heritage and in order to maintain the liveability of local neighbourhoods.

It is noted that the desire to achieve an intensification of residential uses in and around activity centres may be perceived differently by the development industry than Council or the community. Local Government is considered to be in the best position to determine from a local policy perspective the capacity to take additional residential growth while protecting the local amenity and character of each centre and needs to be empowered to be able to achieve strategic outcomes in a local context. This requires the right ‘tools’ for this to be able to be managed.

The current Council policy clearly flags areas suitable for infill development and increasing residential intensity outside of nominated activity centres. Main roads, commercial areas and public transport routes notwithstanding neighbourhood character and heritage objectives, have been identified in policy as areas where growth is encouraged. This allows Council to attempt to protect those ‘more traditional’ residential subdivisions which are a scarce resource across the municipality. More certainty for Council is needed in implementing this policy which is clearly consistent with Melbourne 2030

3.1.1 Transition Areas

There are areas with a relatively high level of amenity adjacent to or nearby nominated activity centres where a level of increase in residential intensity is appropriate. These areas include along St Kilda Road and Inkerman Street between St Kilda Road and Barkly Street. These two areas are currently experiencing redevelopment with predominately residential development. Along St Kilda Road there have been several conversions and redevelopment of office buildings to residential uses.

This trend needs to be carefully managed as whilst it provides a valuable source of residential development and eases the pressure in other areas, it also consumes a future commercial resource. That is once a residential use has been established it is unlikely to revert to a commercial use in the future and therefore this use is lost permanently. The balancing of land uses requires further study to determine a policy position.

A tool to inform and restrict subdivision would assist, as would the ability to zone differently at ground floor to those above so that the floorspace ratio’s can be appropriately managed so that multiple objective outcomes can be achieved.
3.1.2 Growth
Port Phillip population increased from 73,092 in 1996, to 80,157 in September 2001. This increase of 7,065 persons represents a 9.7% growth rate for the City. This population growth contributed to an even higher dwelling construction rate for the same period. A large increase (19%) in the number of dwellings from 35,794 in 1996 to 44,468 in 2001 has facilitated the population growth. This means that the municipality is growing faster than the Victorian State and metropolitan Melbourne average growth rates of 6.2% and 7.3% respectively, and that the City of Port Phillip is the second fastest growing municipality, behind the City of Melbourne, in the inner metropolitan region.

This has been an unusually high growth period and should not form the basis of future predictions alone.

There is a threshold size for a population that is sustainable in relation to the ability of Council to deliver good governance and to ensure that local government is able to continue a high level of service delivery. A point however must be identified when a comfortable population size for a neighbourhood is reached. Due to the continued trend of declining household size there will always be a need to allow dwelling development in order to maintain a population at this level. This raises a concern for Port Phillip. Other factors that also need to be considered are the finite supply of development sites within the inner region and the supply of future potential sites has been reduced due to the recent high rate of development and take up of large under-utilised sites.

Implementation of 2030 should therefore be viewed with consideration for both the longer-term impacts of a changing population, and the existing needs of the community. Council needs to balance this and manage development and growth pressures while protecting and promoting character and amenity and enhancing the function of the centre.

3.1.3 Households
A large percentage of households in Port Phillip (80%) comprise either one or two people, compared with the Melbourne metropolitan region (51%) and the whole of Victoria (53%). Port Phillip has a high proportion of group and single person households (53%) compared to households identified as families, which may or may not include children, (47%). This is well above the metropolitan Melbourne region and Victoria, which both have an 18% non-family household and 72% family household ratio. This household formation has direct implications for the type and form of dwellings and the level of demand. This highlights that the City of Port Phillip does not have a balanced population which is relevant to housing a full cross section of the population.

3.1.4 Mobility
There has been a high level of mobility in the City of Port Phillip, with 29% of the population changing address in the last year, and 61% changing address in the last five years. The extent of the mobility out of the city as compared with mobility within the city is not known at this stage.

Some implications of high mobility or transience however, may result in a lack of connection to and engagement with the local community, negative perceptions of safety and security and reduced access to information and communication services. The short term nature of many
of our residents means that long term community growth is difficult to achieve. Therefore Council must work harder at achieving opportunities for communities to develop on a short term basis.

Port Phillip is clearly different from the greater metropolitan area in many respects and some of the standard solutions provided in 2030 will not necessarily be appropriate for the inner region and Port Phillip in particular.

3.1.5 Neighbourhood Character
This is a key issue for Council. The protection of neighbourhood character is as legitimate a reason for control as is heritage. Planning for housing is intimately linked to neighbourhood character. In some cases the desire to increase the residential density directly threatens numerous areas with established character and amenity.

The protection of identified neighbourhood character, the promotion of a preferred character and the preparation of guidelines are some of Council’s highest priorities. Council has supported this goal through the preparation of an urban character study, a neighbourhood character policy and the development guidelines for two distinct precincts. Apart from the untested Neighbourhood Character Overlay, which does not give any control over demolition of houses with a recognised character, there are limited controls to assist in the protection of neighbourhood character. Council wants the ability to manage insensitive responses to identified neighbourhood character including replacement buildings and demolition controls and the enhancement of other areas that require urban design interventions.

Direction 5, initiative 5.2.1, identifies neighbourhood character is directly linked to sense of place and landscape character. It is noted that the initiative, that research be undertaken by the State Government, is not mentioned in the action list within either the Housing or Activity Centres Implementation Plans.

3.1.6 Local housing strategies
The concept of preparing Local Housing Strategies is not new. The shift in emphasis to considering housing issues on a more regional basis is welcomed. Local Housing Strategies should be the foundation document for the development of local policies, give guidance on where and how the future predicted population will be housed within a certain municipality but also include regional considerations.

To ensure efficient use of local government resources, each strategy should contain a coordinated regional assessment of housing needs. Consideration needs to be given to how a set of criteria is developed that will assist in the assessment of regional housing issues. There are many different views among local government and housing providers servicing the same region. Once the regional needs are identified and data collected, it should then be up to each local government to decide how to deliver at a local level.

The “expectations” of a Local Housing Strategy outlined on page 15 of the Implementation Plan represents a significant amount of strategic work. Some of this work has been done at Port Phillip but will need to be revisited in light of the need to address issues on a regional basis. It unlikely that the preparation of a Local Housing Strategy (LHS) containing all the requirements listed would be completed in the short time frame identified in the action plan.
The planning system should support local government in their existing policy framework while additional strategic work and the LHS is completed.

### 3.1.7 Affordable Housing

In 1996, 79% of all renting households paid less than $200 a week. In 2001, this had dropped massively to 47%. Although such a drop could be attributed to a rise in property values combined with a corresponding increase in household incomes, this cannot fully explain a decrease of this scale. Although the loss of lower income housing options continues, the municipality continues to be home to a significant number of residents in a variety of community and public housing settings. The decrease in lower income households, lower priced rental dwellings, number of families and children aged between 5 and 17 years are also further indications of a reduction in the local diversity.

Melbourne 2030 recognises that it is a legitimate role of both state and local government to provide affordable housing. In particular, there is the potential for local government to have a strong influence over the provision of affordable housing. The provision of community housing is a service in which the City of Port Phillip has an excellent record and has shown leadership through the development of several sites that have demonstrated innovation and excellence. In particular the Inkerman Oasis project is an outstanding demonstration project of blending housing type, public housing and environmental initiatives. This has been recognised internationally with the project receiving an award.

While sometimes considered controversial and challenging it is a necessary role to provide this type of housing. It could become a mainstream role for local government. The benefits of ensuring that this type of housing is provided include: diversity of population, effective delivery of services meeting community needs, and the fact that shelter is a basic human right.

Local government, working in partnership with state and federal government can often add value through playing a joint partner development role and facilitating complex development through the planning system. It can also play a strong role in providing a housing needs analysis, strategic planning, site identification and support through the planning process such as incentives like fast tracking and reduced fees etc. However, this role within local government must be adequately resourced. While this may be a new role for many, it is one which should be encouraged by the State to be taken up by all Councils. The provision of community housing should form a mandatory part of all LHSs.

This approach should be a long term commitment, beyond the three year cycle of local government, in order to build capacity over time. Municipal housing roles however are not a strategy for cost shifting. Improved community housing can only be achieved by:

- The State continuing to invest in public housing
- Maintaining the 75% State contribution level to joint ventures
- Cautious use of any public housing stock transfers without reliance on transfers for community housing stock growth, and
- Ensuring that gentrified areas maintain their share of State housing investment.

Local government is in an ideal position to manage responses to community needs and facilitate partnerships between various players such as community organisations, private
developers and the State. Local Government’s strength is in harnessing social capital. But the track record shows that a clear State policy framework is required to increase municipal involvement that will then more evenly distribute social and affordable housing opportunities.

3.1.8 Achieving affordable housing

The shortcoming of containing urban growth may be that it ultimately contributes to increasing the value of land in the existing urban area and lessen housing affordability. This trend may be unavoidable but highlights the need for increased government support of affordable housing initiatives.

A strategy to ensure that affordable housing is in the most appropriate locations means that consideration of affordable housing is fundamental in all activity centres.

Local government can be assisted in the investigation of land packaging and options to achieve mixed use developments including social housing by working closely with the URLC.

The nature of local government has limited the adoption of provider roles across the board. This has led to a fragmented approach across Victoria and an overall poor involvement in housing affordability issues. Local governments need to be moved from previous positions to more enlightened perspectives. It may be that local government will remain unmotivated to change unless there is a legislative requirement.

The existing variation of housing roles and the unequal distribution of provider roles will reinforce unequal opportunities to access social housing across Victoria and exacerbate spatial, social inequality. This is not ideal if a State objective is to increase equitable access to affordable housing across Victoria. Even if they do not wish to become direct providers, local government needs to appreciate how they can support and augment the role of the State and community housing providers through the facilitation of social housing and in principle support at the statutory planning stage.

Unless all local government adopt a minimum role and include this in a framework of a LHS it will be difficult to address equity of access to affordable housing across the metropolitan area. There is a role for the State in encouraging local housing strategies but there should be flexibility as to the level of commitment of local government. The following is suggested as a starting point and minimum requirements:

- The preparation of policy informed by a housing needs assessment based on State housing data and augmented by local data.

- Policies that aim to support social housing either as a provider or facilitator and reflect local constraints and opportunities. For example, if local government is unable to be an ongoing provider of community housing it may be successful in being a facilitator of social housing. A ‘one model fits all’ approach is not recommended as it may be counterproductive.

- Policies and instruments that encourage the private sector to provide affordable housing through local government’s role as a planning authority.
These potential minimum requirements are consistent with the broad powers under the Local Government Act 1989, ie:

- Facilitate and encourage appropriate development of its municipal district in the interests of the community (section 6 (b)).

- Provide equitable and appropriate services and facilities for the community and to ensure that these services and facilities are managed efficiently and effectively (section 6 (c)).

- Manage, improve and develop the resources of its district efficiently and effectively (section 6 (d)).

- Facilitate the involvement of members of the community, users of facilities and services and Council staff in the development, improvement and co-ordination of local government (section 7 (a))

- Undertake functions in planning and land use that include ‘Housing and other accommodation’ (Schedule I, part 3 (2)).

- Providing detailed housing needs and trends, data and interpretation that meets basic requirements and combines general (eg. ABS) and local (eg. municipal, community agency) data sources.

- Actively supporting in principle social housing proposals from the Office of Housing and community housing providers through the statutory planning process, especially given the growing concern of nearby residents.

- Encouraging private developers to consider affordable housing developments with appropriate incentives.

- Facilitation of social housing development by other organisations through means such as land identification, provision of property information, support for funding applications, assistance with planning consultation, etc.

There are numerous benefits to be gained from the private sector becoming more involved with provision of affordable housing.

The provision of new tools such as inclusionary zoning, that is place-based and that outlines the proportion of affordable housing to be achieved within a certain area is needed. This would ensure that the burden of provision does not lay only with the public sector. The zone should:

- have a clear methodology that justifies the nexus between the required development and the housing need.
- identify the necessary infrastructure to implement; and
- outline possible incentives to balance the requirements placed on developers.

The impact of this would be to:
• Create more sustainable suburbs through higher social and housing diversity and enriches the cultural living experience.
• Reduce social polarisation between income groups.
• Create a better social mix by its incorporation in general development rather than being opportunity driven and increasingly difficult in gentrifying or gentrified areas.
• Increase the viability of services such as public transport, essential and affordable retail provision and social services.
• Increase community connectedness and involvement which decreases as communities homogenise.
• Reduce current pressures on the unsustainable public housing system.
• The responsibility for affordable housing is shared with the private sector.
• Break down the social stigma that public housing faces through achievement of increased social mix.

3.1.9 Housing adaptability

Housing adaptability should have a greater prominence in the Melbourne 2030 Strategy. Greater thought should be given to not just meeting disability access requirements but to support different household structures and changing household lifecycle needs.

It is not sustainable to continue to provide dwellings at the rate of one per person. In recognition of this, Council would like to kerb the trend towards only single person households which is being facilitated by market provision of predominantly small sized apartments. This is the trend, however, that the population forecasts are based on. Therefore some effort must go into developing new ways to facilitate shared households and maintaining the opportunity to accommodate fluctuating household sizes. This has implications for the layout and built form of residential developments, increasing the need to be more flexible to accommodate the lifestyles of several independent adults within the one dwelling.

This could be achieved by including:

- Several living spaces that can be used separately;
- Movable internal walls to enlarge and contract room sizes; and
- Flexible linkage of adjoining units to create opportunities for extended family living or small household living.

Dwelling design should also be more flexible to accommodate work-from-home arrangements. The design should consider the need for extra space for home or small business offices, studios, and cottage industries, and local meeting spaces, hobby spaces and storage spaces to better meet the needs of the future population.

Environmental requirements for dwellings should be strengthened by legislating many simple techniques as mandatory. Port Phillip would welcome providing leading advice on how this could be done.

3.1.10 Sustainability Scorecard

The City of Port Phillip has been in the process of developing the Port Phillip Sustainable Design Policy and the Sustainable Design Scorecard as part of a proposed planning scheme amendment in order to introduce a comprehensive set of sustainable design requirements into the Port Phillip Planning Scheme.
The Sustainable Design Scorecard is a tool that measures how well a particular development achieves a required standard in relation to operating energy, water, stormwater, building materials and transportation energy.

The City of Port Phillip believes the Port Phillip Sustainable Design Policy and in particular the Sustainable Design Scorecard provide a good model of how ecologically sustainable design can be incorporated into and measured within the planning system to improve the environmental performance of new developments.

The State should aim to include some form of scorecard as part of the VPP’s to accelerate the uptake of environmental initiatives.

3.1.11 Possible blockages to successful regional housing working group outcomes

The first action suggested in Implementation Plan 3 is to establish Regional Housing Working Groups. As previously mentioned a regional approach to this issue is welcomed but consideration must be given to overcoming any barriers that might prevent such groups from functioning and producing the desired outcomes.

The following barriers may occur which needs to be overcome for successful implementation of Melbourne 2030.

Membership/participation/motivation.

- No real commitment / imperative in DoI suggested approach for government agencies to be critically involved in housing working groups (as distinct from the SMART growth committee (eg VicRoads, Melbourne Water)
- Lack of drive to achieve outcomes / talkfest
- Differences of opinion amongst Councils
- Denial of need for variety in housing stock
- Parochial positions not wishing to positively participate (ie passive involvement)
- Putting responsibility to local government for incorporated regional outcomes – will this be able to occur without other government agencies that are critical in land use activity (eg service authorities)

Status, Scope and directions/tasks

- Processes / discussions happening but little action on the ground
- Misunderstanding of the requirements / opportunities that can be created
- How to incorporate affordable housing into outcomes
- How to readily get development contributions from developments for social and infrastructure purposes
- Infrastructure issues / capacity / costs for adequate systems to cater for demand
- Lack of ‘on the ground data’ to inform decisions
- How to start / where to start – eg needs a framework

Resources

- A dedicated housing officer from each Council would be ideal
- Real assistance from DoI
- Resources – time and effort issues in preparing strategies

Product

- A regional housing strategy should be required as the umbrella to set the action plan
- A consultation component will be required with the community

Implementation and commitment

- Councils need to be prepared to make decisions based on the working groups recommendations and not simply ignore them
- Inflation of land (lots) due to speculation / holding lots in anticipation / difficulty of assembling land / consolidating land for good developments rather than small lots
- Community opposition to proposals / outrage etc
- Local Planning Scheme controls / lag time to change them
- Local politics and NIMBY issues / neighbourhood character / amenity concerns suggesting it shouldn’t happen

To address these barriers a strong charter/terms of reference and clear framework for how the groups will function is essential.

As a preliminary step the issue of addressing affordable housing should be a subset of the regional groups with membership of local governments with a strong interest in the topic. As there is the potential for this topic to consume large amounts of energy and resources that would detract from a broader framework being prepared and implemented. Strong leadership will be required and an independent chair may be necessary to ensure that the group moves forward.

These issues have also been considered at several forums and reference should be made to the recommendations in the Municipal Association of Victoria response.

4 Activity Centres

Within Port Phillip four Major Activity Centres have been nominated, they are:

- Balaclava (Carlisle Street)
- Port Melbourne – Bay Street
- South Melbourne (Clarendon/Coventry Streets)
- St Kilda (Fitzroy and Acland Streets)

A centre’s category is determined by how closely it meets the list of Key Characteristics and Future Strategic Development Objectives nominated for each category. All other centres within Port Phillip fall into the neighbourhood category. It should be noted that there are no nominated Specialised Activity Centres or Principal Activity Centres within the municipality.

A first step for Council is to review each identified Port Phillip Activity Centre against the listed characteristics and objectives to test if the nominated category for each centre is applicable.
4.1.1 Activity Centre Boundaries

Council welcomes the opportunity to provide clear direction on the future development opportunities for its nominated major activity centres.

A defined boundary for each major activity centre would assist in the management and monitoring of change for that centre. This would provide a level of consistency to enable data collected for the area to form a base line and measure development and change over a period of time. Therefore, the methodology of how the boundaries are set should be consistent to allow comparison across regions and the metropolitan area. This should be decided as part of developing a Structure Plan for each centre. The logical boundaries of centers clearly need to be determined and the linear nature of most strip centres need to be a major consideration. If a boundary is to be used to define where a policy or a structure plan is applied it should also be given statutory weight.

The 400m radius is understood to be a notional area. This does not mean that it is applicable to consider intensification for all that area in an activity centre. In the major activity centres in Port Phillip there are a host of other mitigating factors that mean it would be inappropriate to consider intensification in the whole of this area.

The purpose of the boundary must be clearly stated. The boundary may differ from where zone controls are applied, as it should indicate the sphere of influence and area with a direct relationship to the centre. The boundary will also give clear guidance of where there are development opportunities.

There is a need to distinguish between the drivers for the boundaries of major activity centres and neighbourhood centres. As noted previously not all neighbourhood centres should be considered as targets for intensification and therefore the boundaries of what is considered “in and around “ the centre may be reduced. This is clearly the intention as shown in the diagram on page 14 of the Implementation Plan. Council is concerned that the development industry will interpret the 400m radius as indicating the whole area suitable for intensification.

It should also be noted that the Ripponlea Neighbourhood Activity Centre extends across the municipal boundary into the City of Glen Eira and that this issue would occur in many areas of local government boundaries.
4.1.2 Activity Centre Network

The concept of a network of centres is poorly explained in the strategy. It is not stated how this hierarchy model would be applied across the metropolitan area or how it will inform decision making or policy. There is the implication that the Department will use the concept of the Network as a basis to direct assistance and funding.

The proposed network structure and classification system for activity centres needs to be flexible enough to accommodate areas that currently exist and meet the criteria but may not be considered as an activity centre for various reasons. This will increasingly be the case for inner urban areas that have an established centre on a main road network where businesses have established (also due to historic zone patterns) but may not function as an activity centre.

Therefore all centres must have a clearly defined reason for being eg. a community focus etc.

4.1.3 Out-of-centre Development

Melbourne 2030 refers to out-of-centre development as often being “purpose built on stand-alone sites, are targeted to a specialised niche market and generate many individual trips” [p10 DACIP4]. The Strategy also recognises that Stand-alone single uses do not constitute activity centres, nor do industrial estates. In fact, Melbourne 2030 seeks to restrict out-of-centre development and contains separate policies for industrial land.

Instead of accepting that out-of-centre development that cannot fit within an activity centre is inevitable more effort should be put into developing built-form models that demonstrate that these types of development don’t have to be big boxes. There is a strong need to find examples of these types of use that have successfully been integrated into the existing urban fabric. Again the suburban one-size-fits-all model shouldn’t be the only driver.

The impact of out-of-centre development is different in the inner region compared to other suburban sites. Land values are such that a more intensive use of the site is required to ensure a suitable return. This increases the pressure to yield to what is seen by the market as the current best and highest use. Given the existing built up nature of most of the activity centres, out-of-centre development applications pose a significant development pressure within the City of Port Phillip. There are no greenfield sites within the City of Port Phillip and hence the only source of large lots for development for out-of-centre development are in industrial zoned areas.

The Strategy suggests that out-of-centre development may be considered if it can demonstrate a net benefit to the community. This concept must be clarified and better explained. There is a long list of considerations that might be used to demonstrate net community benefit. In consideration of such development proposals the list should generally be more comprehensive and not merely be argued on the basis of a suggested economic or employment benefit alone. The benefits to be gained should also be measured against the existing benefits potentially lost from existing centres.

4.1.4 Implications of growth in and around activity centres

The Strategy places a strong emphasis on residential growth in and around activity centres. The existing urban structure of Port Phillip shows medium- to high-density residential development within and around its major activity centres. The increased development
pressures for residential growth in and around activity centres (which will inevitably arise from Melbourne 2030) must not occur at the expense of fundamental values, including their heritage, amenity and local character / identity.

It should be noted that if an activity centre is to grow into the surrounding area that a preference should be for growth along main roads and into non residential streets as a first preference and then into residential zones as a second preference. There is also the need to consider the traffic impact in local streets (eg. Street width, parking availability) and to support public transport usage. etc.

There is no clear strategy or action plan in Melbourne 2030 about how local government should decide how much growth an activity centre can support. Council is clear that each centre has a different capacity to accommodate growth based on the opportunities and the principal of protection of the neighbourhood character, local amenity and the function/role of each centre. There are however some basic “filters” which could be applied to give a preliminary indication of a centre’s capacity. The State should provide these in a Practice Note.

Local government should also be able to decide where it is appropriate to direct future growth in a way that does not impact the amenity of the area.

This assessment of capacity should be against a set of clear objectives based on an identified preferred future character, role and function for the activity centre. The objectives should include a list of the “negotiables” and “not negotiables” which may vary for each centre. In doing this local government can give clear direction about development expectations.

The review of each centre required in Implementation Plan 4 should occur in a staged process. The Port Phillip retail policy is well established and may not need to be revisited for each individual activity centre in the short term due to resource levels. The City of Port Phillip is already doing strategic work in several of its major activity centres. Council’s ability to ensure that the established centres survive and thrive, to facilitate change and assess development proposals in and around these centres, is limited by the current planning controls and the inability to influence the proportion mix of uses within a centre.

In order to best manage growth and change in and around activity centres additional “tools” are required to assist Council manage the fine grained land uses and built form to protect neighbourhood character, local amenity and the functionality/role of each centre. For example, existing controls do not allow for proportional management of land uses to maintain diversity, and to avoid any one use being dominated within an activity centre (such as restaurants in Fitzroy and Acland Streets which reduces convenience shopping.)

4.1.5 Compatibility of uses within centres
Performance criteria should address the need for a certain level of compatibility between uses in activity centres. The factor that makes many of Port Phillip’s activity centre’s work so well is also one of their greatest flaws, being the compact nature of a wide range of uses in close proximity in a centre. This “cheek by jowl” effect enhances the vitality of a centre but it also leads to an intensification of conflicts between uses. For example the close proximity of residential, retail/commercial and entertainment uses often results in noise complaints. In
order to maintain the mix and desire to increase the amenity level there is a need to share the responsibility of noise attenuation measures.

Traditionally the responsibility has been solely placed on the noise source with the assumptions that the amenity of the dominant or new use (usually residential) would take priority. As it is the policy of Melbourne 2030 to introduce more residential uses into activity centres, some responsibility for noise attenuation should be attached to the new use. It is important to seek this balance of responsibility if activity centres are to be maintained and enhanced as vital places. Council needs new fine-grained controls to ensure that noise attenuation controls are mandatory in both the generator and any new uses in an activity centre.

5 Integrated Transport

Port Phillip is a major business and tourist destination in its own right and is a conduit for significant commuter traffic driving through or to the central business district. Much of this traffic comes from areas where the public transport infrastructure and service provides poor, if any, competition to the car in terms of speed, frequency and connectivity. Access to easy and cheap parking within the CBD also encourages through traffic.

The number of motor vehicles in the City rose from 35,798 in 1996 to 39,755 in 2001, representing a 10% increase, roughly in line with the overall population increase. The dominant mode of travel to work continues to be by car. Although this growth rate of this mode is not nearly as significant as the growth rate of tram, train, bicycle and walking, this indicates a trend for people increasingly choosing modes other than cars when traveling to work. These other modes of travel overall, still remain a relatively small proportion.

Melbourne 2030 aims to increase the use of sustainable transport through improving public transport services, adding public transport services, promoting walking and improving walking environments, improving cycling facilities and implementing travel demand management (TravelSMART) projects. It also aims to provide more services for freight through improved rail linkages, better management of roads and possibly more freeways and other significant new road space development. These general actions are consistent with Port Phillip’s objectives at the broad level, with the exception of more freeways and road space development.

Port Phillip residents are concerned about the impact of the traffic on the quality of their streets and communities and have indicated through many different consultative processes their desire for the impact to be reduced. Consequently, Port Phillip’s integrated transport policies are being developed and are aimed at reducing the impact of the motor vehicle on Port Phillip through:

- Providing walking, cycling and public transport choices that are competitive with driving for convenience and quality;
- Protecting the competitive advantage of walking, cycling and public transport through appropriate urban design, enforcement and safety initiatives;
- Providing information that will help people use the choices in a way that is appropriate to their lifestyle.
Studies done at some of Port Phillip’s activity centres indicates that walking and public transport usage is high. For example, more than half of the shoppers and visitors (not commuters) travel to Carlisle Street and Fitzroy Street by walking and cycling. Nevertheless, there are still a disappointingly high number of very short trips done by car and further modal shift is needed.

Port Phillip needs to maintain its roads and footpaths to a safe and sustainable level. The expectations of the quality of this infrastructure has increased in recent years as a result of increased Council accountability, Disability Access legislation and an aging population that requires smoother surfaces and wider footpaths.

5.1 Integrated Transport Implementation Plan (6)
Port Phillip sees many opportunities for working with the State Government to provide demonstration projects, particularly in walking, improved public transport services, travel demand management and cycling projects.

The Integrated Transport Implementation Plan 6 is a very general document with little detail. Port Phillip expects that local government will be involved in the development of the detail of the required action plan. The State Government needs to convene groups that are similar to the regional housing groups to assist with integrated transport planning and ensure that clear actionable steps occur towards implementing a package of interventions.

5.1.1 Funding
The Implementation Plan relies heavily on actions that are to be funded but does not provide sufficient funding commitments. The State needs to commit to an action plan with forward funding and a timetable for implementation of transport improvements, based on their priority.

Port Phillip can provide assistance in the preparation of these action plans and priorities as it has considerable knowledge of the key areas that require improvement in the inner region.

5.1.1.1 Project evaluation methodology
Walking, cycling and public transport projects seem to have been evaluated using different methodologies and criteria compared to road projects. This has led to a bias towards funding roads. The evaluation needs to be standardised and should include the externalities of:

- Deaths and diseases caused by air pollution;
- Cardio vascular diseases caused by inactivity;
- Osteoporosis caused by inactivity;
- Noise;
- The amenity and safety of an environment, which should encourage people to walk or cycle, and
- Community connectedness, which is enhanced by environments that encourage people to walk, sit, or cycle.

The evaluation and methodology used needs to be transparent and open to genuine community and local government involvement, and must be measurable according to sustainability indicators.
5.2 Public Transport

There appears to be little, if any, opportunities offered through the Implementation Plan for improved public transport services within Port Phillip. The Principle Public Transport Network (PPTN) in Port Phillip would seem to consist of the existing tram routes and possibly the Red Orbital bus route (basically the bus route 246) though this is not apparent. Whilst the proposed improved services to the middle and outer suburbs, coupled with improved planning will be of benefit to City of Port Phillip it is doubtful whether these will have a significant impact on traffic through Port Phillip that remains a major concern.

The Implementation Plan indicates that public transport improvements in the inner and middle suburbs will be primarily about increasing travel efficiency. The recently completed Public Transport Study done for the City of Port Phillip by Melbourne University indicates improving travel times, though this is indeed welcomed will not be enough. The study recommends improving existing tram and bus services through more appropriate routing, including:

A) Four “new” cross route bus services (formed partly from existing services):
- Inner western suburbs via Westgate Bridge and Port Melbourne to St Kilda
- Port Melbourne via Albert park to South Yarra Station
- Garden City via South Melbourne to South Yarra
- St Kilda to Caulfield and East Malvern Stations. (This could be done initially by bus services connecting to the existing tram route, then by extending the tram route.)

B) New radial routes, based on major study
- trunk public transport linkages between Port Melbourne and South Melbourne to new developments in Docklands, Southbank and Yarra’s Edge.

C) Improved connectivity, by:
- Extending the tram route 112 (South Melbourne tram) past its present terminus at Fitzroy Street to continue along the Boulevard and along Balaclava Road. (This would only require 30m of new track work)
- Reinstating the tram route 16 (Melbourne Uni to St Kilda), whose service had been cut back when combined with another tram route, and extending it past Melbourne University to East Coburg.
- Bringing the number 78 tram from Chapel Street round the corner onto Carlisle Street and into St Kilda all the time, not just off peak.
- Extending bus route 630 (Elwood to Monash University) through to St Kilda and combine it with a revised route 600 (St Kilda to South Land Shopping Centre) to provide a high quality service
- Improving the Garden City/Fishermans Bend bus routes.

D) Service improvements through:
- Improved minimum frequency standards applied to buses and trams
- After mid night services
- Improved facilities at interchanges
- A safe system
- Improved running times through priority at traffic signals. – St Kilda road trams are major priority
- Cheaper fares for people on limited income
Only some minor infrastructure improvements are needed, to create significant improvements and these should be prioritised to capture these efficiencies.

5.2.1 Integration
It is noted that other inner city municipalities may be able to obtain significantly improved public transport services through, for example, having more trains stopping at the inner city stations and having better links between trains and trams.

Buses must be able to meet trains. This requires coordination of not only the train and bus plans, but the coordination at the operational level. It is not clear how this coordination will be achieved, but is a key fundamental point.

5.2.2 Social Equity - cheaper tickets
Public transport tickets are a burden for people on low incomes and there is a direct cost shift to Council. Recent community consultation about Port Phillip’s community bus indicated that many people use it in spite of the inconvenience because it is free. If public transport tickets were cheaper many would use public transport instead. Reducing costs for low-income people needs to be seriously considered by the State.

5.3 Roads
The implementation plan indicates that work will be undertaken to improve on road public transport priority and this is applauded. Some indication of priorities, (apart from Tram 109) is required as little information is provided. Port Phillip regards the improvement of tram speed along St Kilda Road, Collins Street and Bourke Street to be a high priority.

Figure 6 in the Implementation Plan includes new and proposed major roads, without being at all clear about what is actually proposed. Major road expansion should only be considered if there are still major congestion problems after Travel Demand Management and major public transport improvements are implemented, and therefore should not be processed until the improvements can be evaluated.

The task related to the development of a metropolitan road and traffic management strategy identifies the Department of Sustainability and Environment and other key stakeholders. Unlike for other tasks, local government is not specifically listed as key stakeholders but clearly should be.

5.3.1 Congestion pricing
The Implementation Plan has made no reference to congestion pricing, a tool that charges motorists for use of heavily congested roads during peak periods. This has recently been introduced in London. Melbourne’s levels of congestion are much lower than in many major cities and so any congestion pricing may be a long term project. Nevertheless, the Government should signal that it is assessing all methods to improve transportation for Melbourne.

5.3.2 Parking
The proposed parking studies should have the clear objective of reducing the commuter and short term traffic flow to the City of Melbourne and surrounds. The availability of plentiful parking in the CBD results in significant peak hour car trips through Port Phillip. Limitation policies or congestion pricing are legitimate methods that require serious investigation. The
implementation plan supports further TravelSMART projects, which is supported. Port Phillip is willing to become further involved in these programs.

5.4 Freight
Port Phillip also interfaces with the Port of Melbourne and as a result is subject to considerable freight movement. Much of this freight drives along Beach Road or through older style residential areas to the detriment of these precincts.

While the implementation plan specifically seeks to decouple car use from economic growth, there is no such methodology for freight. It is predicted to grow by 50% over the next few years, to the detriment of amenity and road infrastructure maintenance. A shift to rail is proposed, but this will only result in a modal shift for interregional freight. Further State Government interventions are required.

Many heavy truck movements, particularly along Beach Road, afflict Port Phillip. Moving the trucks to the Nepean Highway would reduce the impact on Port Phillip’s tourist trade and residential amenity. St Kilda Junction should also be upgraded to allow improved large truck movement whilst creating the potential for another activity centre. Council seeks serious discussions with the State regarding its visions for this precinct.

The construction of Dockside Road and the movement of trucks from Williamstown to Plummer Street are also essential for improved access to and from the port and to minimise disturbance to residential areas in Port Melbourne.

6 Industry
The topic of industry is included in the body of the Melbourne 2030 but does not have a specific implementation plan. The Strategy recognises that industrial land is a scarce resource in close proximity to a working port and integrated network of freeways. Port Phillip wishes to protect core industrial uses as a policy objective.

The Council is currently awaiting a response from Government on the re-unification of Fishermens Bend. If this were to proceed, there could be scope for this re-unified precinct to be nominated as a potential Specialised Activity Centre, key research and development precinct, – both in Melbourne 2030 and the City of Port Phillip Local Planning Policy Framework.

The City of Port Phillip industrial areas are under threat from development pressure to more intensely use large land holdings. This is in the form of subdivision into smaller lots to allow non-core industrial or other uses.

Melbourne 2030 states that out-of-centre proposals will only be considered where it can be convincingly demonstrated that the proposed use or development is of net community benefit to the community in the region served by the proposal. This has direct implications for Port Phillip as the core industrial land (zoned IN1Z) and buffer commercial/industrial land along Williamstown Road is under pressure to be redeveloped to a higher land value use like retail or residential uses.

This issue is also currently being experienced in some Industrial 1 and 3 and Business 3 zones in the municipality, noting a current proposal to develop a significant supermarket
and/or big box retail development (on the scale of a sub-regional shopping centre i.e. 20,000 m2 floor area) in the core industrial area of Fishermens Bend, Port Melbourne.

There is an urgent need to protect future options for industrial uses even though they may not be the current highest yielding use economically. Where an out of centre development is proposed on industrial zoned land, consideration of the lost opportunity for industrial uses must also be built into the net community benefit equation.

Melbourne 2030 states that for the important Fishermens Bend precinct, where employment could more than treble by 2020, development must not jeopardise the needs of the adjoining Port of Melbourne as a working port and as one of the State’s most important freight transport gateways. Partnerships between the Melbourne Ports Corporation and Local and State Government is required to maximise the benefits of joint promotion, integration of infrastructure and e-commerce projects, and land use planning and management of the impacts to the surrounding areas.

This is consistent with the Port Phillip Industry and Business Strategy recommendations, noting that the port authority lodged a submission with Council in support of the Strategy.

Melbourne 2030 has some specific initiatives that are consistent with the recommendations of the Port Phillip Industry and Business Strategy but require further Government input and direction to implement; eg helping local government to provide well-located, appropriate and low-cost premises for not-for-profit or start-up enterprises.

6.1 Public Open Space

The Foreshore, Bay and Albert Park Reserve serve as significant public open spaces on both a local and metropolitan level. This limited space is essential as a recreation opportunity for a highly urbanised inner city area.

The supply of public open space in the City of Port Phillip is a scarce and finite resource. The perception that there are large amounts of public open space (the Foreshore and Albert Park Reserve) when viewed on a map does not equate with the reality of the high numbers of people who use and rely on these spaces to meet their recreation needs.

This finite public open space resource is coming under increasing pressure and hence its useability and the quality of amenity that is offered must be protected and maintained. In built up areas it is difficult and costly to develop new open spaces.

Council’s inability to manage or influence these conflicting needs means that the quality of life for many local residents is affected. It is noted that the Councils Municipal Strategic Statement states that Council will continue to advocate for the relocation of the Grand Prix from Albert Park Reserve.

Due to the compact nature of residential uses in the City of Port Phillip private open space are often very small. There is also an increasing proportion of the population living in apartments with little or no private open space.

The South Melbourne residential area has a low supply of local open space and relies heavily on Albert Park Reserve for recreation. Any limitations in access to Albert Park Reserve has an impact on local residents that regularly use the reserve.
Further public open space to cater for increased demand as residential intensities rise will also be necessary. In activity centres pedestrians ‘places and spaces’ will also be required to provide meeting places and for passive recreation.

7 Direction 7 A greener City

The directions outlined in this section of Melbourne 2030 are very broad and quite generic and although the directions are generally in line with current Council policy, there is scope for improvement to clarify the intent and proposed implementation of initiatives with more precision.

On a metropolitan level it is important to recognise the Bay as a key open space asset that needs to be managed given the increased pressure from intensification of development along the coastal region. Local government bear considerable costs in maintenance for areas that are coming under increasing pressure from users across the metropolitan area.

Council also recognizes a link between the increased pressure, from residential intensification, and the maintenance and enhancement of inner public open spaces and the protection of the Green Wedges. It is important for the greater good of Melbourne that the Green Wedges are protected.

The infrastructure that supports the use of these foreshore areas should be supported at a metropolitan level and not just by the immediate local government for the area.

8 Physical Infrastructure/capital works

The City of Port Phillip does not have any greenfield sites. The implications for infrastructure provision is on the upgrading and increasing of capacity of existing rather than development of new infrastructure. The City of Port Phillip is already a built up area. Any infrastructure works will have an impact on the amenity while occurring e.g. disruption. There is also limited opportunity to adequately fund infrastructure works from development contributions due to the nature of the infill development typical in Port Phillip. Hence programs to upgrade are under greater pressure due to existing pressures and constrained ability to fund works.

As activity centres are the areas identified to absorb the majority of growth over the next thirty years, these areas should also be the emphasis for infrastructure improvement. In particular the five nominated major activity centres need to have a detailed assessment of their infrastructure needs based on various growth scenarios.

Council is continually faced with the problem of maintaining and upgrading infrastructure in line with community expectations and available resources. At the moment Council is not fully meeting the complete theoretical infrastructure upgrade/maintenance requirements for the existing population. The extent of pressure driving the infrastructure requirements to accommodate the additional population will be very significant yet funding has to be found.

Other matters of influence regarding infrastructural capacity will be:

- Energy-efficient building design (including water sensitive designs)
- The amount of waste generated for disposal off-site; and
- Demand for technology—cabling etc
Similar to the regional model suggested for other key issues, working groups should be established to assist in the coordination of delivering infrastructure improvements. The imperative is to include local government areas that bear the impact of decisions from State Government agencies or other local governments at the early stages. It would be sensible to include the coordinated provision of infrastructure as an essential consideration on other working groups agendas.

Decisions on accommodating more intensive uses should be tempered by local government’s ability to delivery the necessary associated infrastructure.

9 Monitoring

The Directions and initiatives in Melbourne 2030 are based on data about dwellings, previous growth rates and uses this data to forecast future outcomes. Much of the policy direction is based on achieving a predicted future population. It is acknowledged that through data collection and monitoring change, that adjustments to the policy directions can be made that will make policy more locally responsive. This has direct implications for local government who has not previously made monitoring or the study of the cumulative impact of policies a high priority. The ongoing development of strategies and policies relies on the monitoring of development and feeding in trend changes. This also highlights the need for data about what is currently in the system, but yet to be built, to be included in the decision-making process for development applications.

Through all actions in the implementation plans it is essential that DSE take a lead role in giving guidance about the standardisation of data collection. This should extend to guidance on the range of information to be collected and how this information can be used to set benchmarks and allow for comparisons across the metropolitan area and in monitoring of growth patterns.

10 Better Planning Decisions & Careful Management

The initiatives listed against this policy should be coordinated through an Implementation Plan and achieved promptly. Although several of these initiatives already occur at both state and local government levels, better coordination is clearly required to ensure that the objectives are achieved. Initiatives should be properly resourced and sequenced to gain maximum benefit and linked in with other initiatives to be efficient.

The Whitney Committee recommendations (paper 1) should be fundamental to system improvements so that policy certainly and clarity occurs for stakeholders.

It is recognised that there is a case to reduce the need for planning permits (Initiative 9.1.3) in circumstances where there is a clearly defined outcome and criteria against which the proposal can be assessed. It is suggested that this concept could be used to give greater certainty to applicants in areas where the strategic work (eg. Structure plan and urban design framework) has been completed and incorporated in the Planning Scheme, and there is a defined outcome and criteria. This could be applied through a new set of controls for activity centres.
It is suggested that a further step be considered to reduce the ability to appeal Council decisions (both by third parties and the applicant) if the decision is in line with the activity centre defined outcomes.

11 New tools

Various discussions in Melbourne 2030 and the associated Implementation Plans give a clear indication that the State Government is considering the need for new tools to be added to the current planning system.

Local governments are also at different points along a continuum of strategic thinking and policy development.

The existing planning tools have contributed to the existing activity centre's form and if these centres are to be retro-fitted then a new set of more sophisticated tools and controls are required.

The desire to simplify the planning scheme since the mid 1990's has not been successful and has led to further complexity. This needs to be addressed and the Whitney Committee recommendations provide key solutions to this dilemma.

For any new tools to be effective and utilized by local government the effort to develop policy and enshrine it into the scheme must also be recognized and respected in its implementation. For example the introduction of a schedule to the Business 1 Zone (regarding restaurants) has not been well used by local government because it does not meet the need to manage the mix of uses.

The need to facilitate better management of land use has been recognised in the Melbourne 2030 Strategy as has the need for standards, guidelines and performance criteria. However this does not address the problem of managing the mix and proportion of particular land uses within a centre. Meeting the suggested Performance criteria for activity centres by relying only on the market place to determine what is appropriate for an activity centre will not ensure strategic outcomes are met. This has been recognised in the residential sector through the ability of local government to regulate and direct where residential growth should go and its built form, and should be replicated for commercial/retail uses.

11.1.1 Structure Plans

Structure Plans have been used previously by local government generally for greenfield sites and new subdivisions.

There is a need for good mechanisms to implement structure plans and give them statutory weight (that encompasses a holistic integrated approach) with a coordinated set of tools/controls. Currently, a structure plan could be implemented through up to as many as 6 different planning tools/mechanisms in the planning scheme.

The issue of needing to better coordinate planning outcomes across municipal borders is also raised. In particular, the mechanisms that will assist and facilitate a coordinated planning approach need to be developed.
12 Implementation

The implementation of many of the initiatives require a good working relationship between local government and State Government agencies. Other State Government agencies must be required to reorganise their work programs and policies to align with the implementation of Melbourne 2030.

The range of actions listed in the three Implementation Plans relevant to Port Phillip is considerable. When viewed in their entirety the Department is suggesting that it will undertake, or at the very least, start a total of 20 actions in the next twelve months. Some of these actions are a high priority and will require considerable involvement in the form of participation and undertaking work to produce an outcome from local government. In addition the sequencing of these actions is such that many of the decisions required from local government are dependant of the actions being completed and an outcome produced. For example, most local government would be reluctant to embark on a structure planning process without a practice note on the preparation of structure plans.

There is also the question of available resources within the Department to do all the listed actions in addition to providing assistance to Local government in giving direction about the implementation Melbourne 2030.

A key role of the Department will obviously be to facilitate actions in a coordinated form between State Government agencies and local government, especially on a regional basis.

Council already has a large work load and additional projects will increase the strain on limited resources. There is also an accumulating backlog of strategic work yet to be undertaken or implemented. However, there is opportunity to add value (through additional funding and greater efficiencies) to this work through the alignment of Council’s work program with that of State Government. In many cases projects have already commenced or proposed in Council’s work program such as work already being carried out in three of the five nominated major activity centres.

A means of assisting local government to fund improved planning (both strategic & statutory planning) would be simply to increase the planning fees for planning applications. At present local government recoups, only some 35-40% of its statutory planning expenditure through planning fees. A significant movement in the fee structure would be of direct benefit to local government planning resources without any State expenditure.

12.1 Partnership approach and working groups

Council is active in a range of regional and sub-regional groups such as the Association of Bayside Municipalities, Metropolitan Environment Forum, Metropolitan Transport Forum, Inner South East Mayors Forum and, Southern Region Health.

The suggested establishment of various committees and working groups is a good model however it should be recognised that these groups must be resourced, have strong charters and be supported to produce agreed outcomes able to be implemented.

Due to the delay between when a position is adopted by Council and an amendment process is completed a position will arise that numerous policies will have minimal ‘weight’ while
Council is processing the amendment. The State Government needs to provide support to local government through these intervening times.

12.1.1 Work Program implications – cross Council coordination
As the broad directions of Melbourne 2030 are in line with Council’s Corporate Plan and existing policy framework a significant change in Council’s current direction will not be required. Throughout this response various Council Actions have been highlighted. It is recognised that the implementation of 2030 will require a whole of Council approach and there will need to be minor adjustment to Council policy framework to better align and achieve the desired outcomes.

Due to the nature of Council’s service delivery there will need to be some lead time to incorporate these adjustments into the normal planning cycle. However in many instances due to Council’s existing policy framework, which is strongly focussed on sustainability and service, many of the initiatives are already in progress and will only require minor adjustment to meet 2030 objectives.

Council believe that there is merit in demonstration projects which could be used as models to implement Melbourne 2030 across the municipality and the greater metropolitan area. Council is willing to discuss possible involvement in these areas and able to discuss these immediately.

12.1.2 Introduction of Clause 12 to the Planning Scheme (SPPF)
Melbourne 2030 proposes to insert Clause 12 into the State Planning Policy Framework and sit alongside existing clauses in the State Planning Policy Framework. There are overlaps between Clause 12 and the existing Clauses 11, and 14-19 however where inconsistencies arise Clause 12 over rides the other existing policies (specified at 12.02). Melbourne 2030 then becomes a reference document in the scheme.

This highlights the need for the Strategy and policy statements in Clause 12 to be as specific as possible and not open to a wide variety of interpretations.

There are several statements in Clause 12 so generic in nature, that they do not provide any guidance in decision making. These need to be vastly improved in accordance with the principles of the Whitney Committee recommendations, otherwise little clarity and certainty will exist which will create major implementation difficulties.

Only part of Clause 12 will be applicable to the City of Port Phillip. Most directions and policies within Clause 12 are in line with or neutral to the Local Planning Policy Framework in the Port Phillip Planning Scheme.

One of the key issues for Council, however, will be the weight given to each Policy direction in Melbourne 2030. From Council’s perspective there is a need to ensure that equal weight is given to each policy otherwise the risk of certain policies dominating others such as has been the case with the previous urban consolidation clause in the scheme.

Some adjustment will need to be made to the existing Council policy to ensure that conflict or confusion is avoided. It is not clear in what format these adjustments will be made, either as part of an amendment to introduce Melbourne 2030 to the scheme or as a separate amendment initiated by Council. There is also the opportunity to include some policy
adjustment considerations in Council’s review of its MSS, scheduled to occur in the 2003/2004 work program.

13 Conclusion

Throughout this response there has been the continuing theme of the need for greater support to local government to manage complex mixed-use areas with a greater level of sophistication.

The real implications of Melbourne 2030 for local areas will depend upon the interpretation and application through detailed planning and decision making. The host of initiatives and action plans within the Melbourne 2030 Strategy demonstrate that actions are required on many fronts and will rely heavily on local government resources to implement them.

The City of Port Phillip believes that the bulk of the Strategy directions are in line with much of the existing policy framework of Council. Some finetuning will be required to better align but this can be achieved through the implementation program.

Council has demonstrated a high level of commitment to the Strategy and its implementation. However to achieve the key results local government must be further empowered and provided with the scope to determine how and where it will achieve the directions of the Strategy in the context of local conditions and community aspirations.

Improved ‘tools’ are urgently required so that the strategic intent and outcomes can be achieved on the ground. Without these the implementation will not be successful as policy and outcomes will diverge as a direct result of having insufficient means (tools) to intervene into the market to influence and create strategic outcomes (see Whitney Committee findings and recommendations).

Council has included a series of actions to give a preliminary indication of how implementation at a local level might occur and the commitment to prepare a dedicated 2030 implementation plan. The process of implementing the Strategy should be one that is both integrated between state and local government and other stakeholders.

Council also presents a list of recommendations for State Government to enable effective implementation to occur.

Port Phillip is already progressing many of the broad directions of Melbourne 2030 and is willing and able to provide its experience to assist in the implementation phase.

14 Appendicies

1. Implementation Plan 3 Housing table
2. Implementation Plan 4 Activity Centres table
3. Map of Activity Centres in Port Phillip
4. Integrated Transport Implementation Plan 6 table
5. Environment table
6. Industry table
7. Listed Council Actions
8. Preliminary work program