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23 December 2015

Plan Melbourne Refresh  
Department of Environment, Land, Water & Planning  
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Dear Plan Melbourne Refresh

**Re: Plan Melbourne Refresh**

Peninsula Speaks has pleasure in submitting comment on the Refresh of Plan Melbourne.

Peninsula Speaks Inc. is a community organisation that was founded in 2008 to help give a collective voice to those concerned about the future planning of the Mornington Peninsula and preservation of its unique and diverse environment and landscape values

Our role is in coordinating or facilitating community input into; shire and state planning schemes, and environmental and landscape preservation. Our membership comprises of individuals and over 30 community and environmental groups.

Following are our comments:

**Summary**

State Governments of all persuasion, the Mornington Peninsula Shire Council and the local community recognise and agree there is significant benefit for the Mornington Peninsula to remain different from, but complimentary to urban Melbourne. The difference contributes to the health and well being of Melbournians (and Victorians) and to Melbourne being regarded by many as one the world's most liveable cities.

A comment often made by those living on the peninsula is that: 'It is different from St Kilda, Port Melbourne, Frankston and Melbourne's urban suburbs. It is not the Gold Coast and we don't want it to be".

Plan Melbourne needs to provide a clearer direction between the urban area of

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Melbourne and areas such as the Mornington Peninsula. The evidence that Plan Melbourne does not adequately address the difference was shown by the need to produce the 'Mornington Peninsula Localised Planning Statement' in 2014.

Even the title 'Plan Melbourne' gives the inference that there is no difference between Melbourne's urban areas and the Peninsula. A title, such as 'Planning for Melbourne and its Surrounding Area's' would be an improvement and provide a basis for the distinction.

## **Detailed Comments.**

### **1. The Mornington Peninsula is distinct from metropolitan Melbourne**

The government indicated with the introduction of the Mornington Peninsula Localised Planning Statement 2014 that the Mornington Peninsula:

- "will be planned as an area of special character and importance with a role clearly distinct from and complementary to metropolitan Melbourne and designated growth areas<sup>1</sup>", and
- "The Mornington Peninsula will be planned as an area of special character and importance with a role clearly distinct from and complementary to metropolitan Melbourne and designated growth areas.

The Mornington Peninsula is one of Melbourne's greatest assets, characterised by contained townships, a substantial and diverse local economy, and areas of national and international conservation significance. The Mornington Peninsula is critical to the future liveability, sustainability and prosperity of the wider metropolitan region.

As an area near to, but with a role distinct from, the growing metropolitan area there are ever increasing pressures and demands placed on the Mornington Peninsula. For this reason it is necessary to put in place clear policy directions for the long term benefit of both local communities and the wider Melbourne population."

In our view, Plan Melbourne fails to adequately recognise the difference between the Mornington Peninsula and Melbourne's urban area. There are few references to the Mornington Peninsula. While it mentions the Mornington Peninsula Localised Planning Statement there is not sufficient comment throughout the Plan to indicate when statements, outcomes, objectives and directives are not relevant to the Peninsula.

Because of this lack of clarity the problem of ambiguity arises. Developers and planners selectively reference clauses which are more related to Melbourne's urban area to support planning applications. On a number of occasions we have

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<sup>1</sup> Mornington Peninsula Localised Planning Statement, July 2014

experienced Council officer's confusion with planning policies for Melbourne and those for the Peninsula, and also at VCAT where developers' planning representatives are quick to quote any ambiguity.

**Our Comment:** *There needs to be a greater emphasis in Plan Melbourne on the difference between the Mornington Peninsula and urban Melbourne and also greater recognition of the Mornington Peninsula Localised Planning Statement.*

*Peninsula Speaks supports the Council in seeking a strong statement from the State government to maintaining and supporting implementation of the Mornington Peninsula Localised Planning Statement<sup>2</sup>*

*Plan Melbourne needs to be thoroughly reviewed to eliminate any ambiguity.*

## **2. The Mornington Peninsula Strategic Plan (the Council Plan)**

In accordance with clause 125 of the *Local Government Act 1989 (Act)* councils are required to prepare a Council Plan which in the case of the Mornington Peninsula Shire is called the Strategic Plan. The *Act* requires that a copy must be submitted to the Minister for Local Government and made available for inspection at the Council office and any district office. The Mornington Peninsula Shire Council also publishes the Strategic Plan on its website.

In accordance with the *Act* the Mornington Peninsula Shire Council is required to implement the following actions which are outlined in the Strategic Plan<sup>3</sup>:

- 'The Mornington Peninsula must be planned as an area of special value, character and importance, with a role clearly distinct from but complementary to metropolitan Melbourne and the designated growth areas.
- The existing Urban Growth Boundary (UGB) should be maintained, retaining approximately 70% of the peninsula as a permanent rural Green Wedge.
- The significance of the Mornington Peninsula as part of the Western Port Biosphere must be recognised and given effect through conservation of natural systems and biodiversity.

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<sup>2</sup> Mornington Peninsula Shire Council, Minutes of Council meeting, 14 December 2015.

<sup>3</sup> Strategic Plan 2013-17, Mornington Peninsula Shire, pages 12 and 13.

- Policies for the Green Wedge should support and promote productive agricultural use of land, and opportunities for adaptation driven by climate change.
- The existing hierarchy of activity centres provides an important framework for the sustainable accommodation of future population growth through integrated local area planning. New population growth should be directed primarily to major centres with a greater range of services and facilities (and employment opportunities). However, it is critical to maintain the distinctive look, feel and function of each of the peninsula's townships and settlements, and to have regard for their history and heritage.
- The peninsula will need to meet increasing recreational demands, both from residents and the wider metropolitan community. The natural and cultural values of the peninsula, including those of the coast and beaches, must be protected from inappropriate development."
- The Port of Hastings [If it proceeds] must be planned and developed as a world class green port, supported by effective transport infrastructure to avoid impact on nearby township areas.
- The engagement and involvement of the community in shaping long-term decisions is central to gaining support and achieving implementation.

The Strategic Plan also states:

'It must be emphasized that the Mornington Peninsula is not a 'growth municipality'. As plans are currently being developed to guide metropolitan Melbourne's growth from its current population of four million to more than six million by the early 2030s, the Shire's challenge is to continue to be 'near to, but not part of Melbourne' and its accelerating growth. While some change on the peninsula is inevitable, it must be carefully planned and managed.'

A Shire priority for 2013-17 is 'to keep 70% of the peninsula as Green Wedge'.

**Our Comment:** *It is mandatory for the Council to comply with the above statements and in accordance with the Local Government Act 1989 and Plan Melbourne must reflect these directions.*

### **3. Environment and biodiversity**

**'For its size, the Mornington Peninsula is the most biodiversity-rich region in Victoria, exceeding state averages in all categories'<sup>4</sup>**

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<sup>4</sup> Peninsula Speaks, Inc, 2015, <http://www.peninsulaspeaks.org/links.html>

The Shire's 'Mornington Peninsula Biodiversity: Survey and Research Highlights' report states that it aligns with the Shire's Strategic Plan 2013—2017; in particular Goal 1: Liveable peninsula and Goal 4: Leading change on climate change.

The report also comments:

'The Mornington Peninsula has a complex pattern of native vegetation, reflected in over forty - three vegetation types (Ecological Vegetation Classes) and associated complex habitats. Since European settlement in the early 19<sup>th</sup> Century, 82% of natural vegetation cover has disappeared along with the associated decline in ecosystems upon which fauna are dependant. Today, native vegetation removal occurs at a slower rate, although retained native vegetation is increasingly subject to fragmentation and numerous degrading processes.

The Mornington Peninsula contains some of Melbourne's most important large parks that add to the Green Wedge e.g. Mornington Peninsula National Park, Arthurs Seat Park and Devil Bend which provide for the "lungs of Melbourne" and the home of native flora and fauna.

**Our Comment:** *The Plan Melbourne should place more emphasis on the landscape and environment of the Mornington Peninsula and its biodiversity importance and value.*

*In addition to the actions outlined in the Ministerial Advisory Committee's report of June 2015, item 8.10 the Government should review and consider further actions in Plan Melbourne for introduction on the Mornington Peninsula and in particular preservation of the Peninsula's large parks in Green Wedge .*

*Peninsula Speaks supports:*

- *the existing initiative 5.2.3 in Plan Melbourne to protect the coastlines and waters of Port Phillip Bay and Western Port*
- *the comments in 'Plan Melbourne Refresh At a Glance' that:*

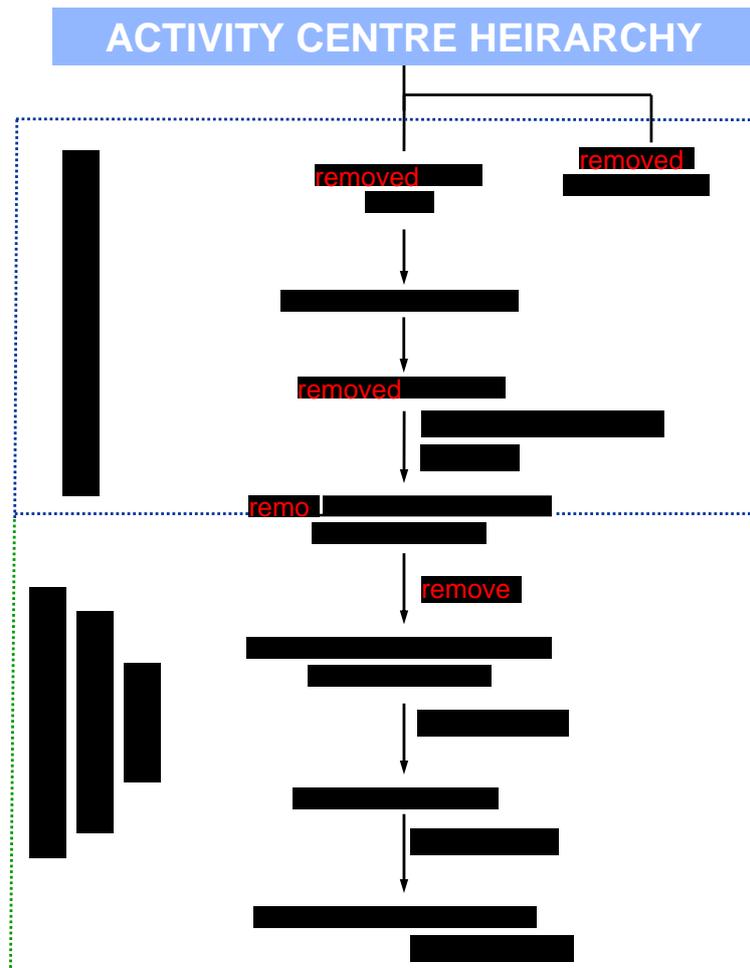
*'The existing urban growth boundary will be locked down and the planning rules for green wedges will improve protection of key values", and*

*'More attention will be given to the rural areas surrounding Melbourne to avoid negative spill over effects and to protect environmental assets and agricultural land.'*

#### 4. Development and housing

The Mornington Peninsula Shire was the leader in the development of an hierarchy of activity centres and townships. The Shire has approximately 40 such centres which range from major activity centres to convenience centres. Figure 1 provides an illustration of the hierarchy.

Figure 1. Hierarchy of Activity Centres



Peninsula Speaks is of the view that principles for applying the reformed residential zones outlined on page 70 of Plan Melbourne do not reflect the unique development of many of the Shire's coastal and rural townships. The development of the Peninsula or many of its. We support the following statement in the Mornington Peninsula Localised Planning Scheme (Strategyn 7, page4) is supported:

'The establishment of a strong and consistent overall policy framework for future land use and development is essential, including the use of mandatory controls and standards where necessary, due to the particular pressures on the Peninsula's rural landscapes, coasts, towns and villages, and the risk of unintended and unplanned change through cumulative impacts. "

**Our Comment;** *Peninsula Speaks supports the Shire in seeking a strong statement of commitment from the State Government to maintain and implement the Mornington Peninsula Localised Planning Statement.*

*The words 'lower building heights' inserted in the clause of Page 157 of Plan Melbourne as follows:*

*Smaller towns in the peri-urban and regional areas also offer the opportunity for an attractive country lifestyle. Attracting more growth to some of these strategic towns will not just take pressure off Melbourne, but also attract greater provision of services to these towns as populations grow. Development in and around these towns should not be an imitation of Melbourne's growth areas, but should offer a less-crowded, lower-density housing product, with **lower building heights** and larger housing lots that will particularly cater for families.*

#### **4. Climate Change and sea level rise**

. Over the last few years that climate change and sea level rise appears to have taken a backward step in Victorian planning. There are only six references to climate change and no direct mention of sea level rise in Plan Melbourne despite greater publicity and public awareness.

There is less emphasis on the precautionary principle the State Planning Policy Framework (Clause 13.01-1, 4 July 2012) which is quite ambiguous to the lay person when it says:

"In planning for possible sea level rise, an increase of **0.2 metres over current 1 in 100 year flood levels by 2040 may be used** for new development in close proximity to existing development (urban infill).

**Plan for possible sea level rise of 0.8 metres by 2100 [for new developments outside existing town boundaries]**, and allow for the combined effects of tides, storm surges, coastal processes and local conditions such as topography and geology when assessing risks and coastal impacts associated with climate change."

The development along Port Phillip Bay like most of urban Melbourne, is continual and therefore in 'close proximity to existing development (urban infill). There is no clear definition of the vague statement 'close proximity' – so is this a few hundred metres or a few kilometres?

In practical terms the risk from sea level rise is the same for new developments in close proximity to existing town boundaries as that for new developments outside existing town boundaries.

**Our comment:** *Plan Melbourne should revert back to the Objective (VC71, 20/9/2010.) which was to plan for and manage the potential coastal impacts of climate change which applies the precautionary principle and for sea level rise of not less than 0.8 metres by 2100, and allow for the combined effects of tides, storm surges, coastal processes and local conditions such as topography and geology when assessing risks and coastal impacts associated with climate change.*

## **5. The 20 minute neighbourhood principle**

The application of the 20 minuter neighbourhood principle to the Mornington Peninsula townships is not clear-cut. Many of the coastal townships are predominantly residential and 34.1% of working residents travelled outside the Peninsula to work in 2011. Because the Peninsula is not centrally located and is 'at the end of the road' where raw product has to be transported in and finished goods transported out it is unlikely the Peninsula will develop a strong manufacturing base in the near future or how there will be a shift away from car dependency. Work is seasonal and there are no major government offices, medical institutions, research or educational institutions to provide employment.

**Our comment.** *The relevance of the 20 minute neighbourhood principle and its application needs to be examined.*

## **6. Better transport**

The Mornington Peninsula has been for improved bus services for many years. While some marginal improvements have been made over the last decade the services are still poor. In peak hour the bus to and from the Southern peninsula Frankston runs only every 50 minutes compared with many Melbourne suburbs where residents have an option of a bus, train or tram every few minutes.

One of the greatest disappointments on the peninsula is the refusal of either the State or Federal Government to commit to the funding of the continuation of PenBus. PenBus is a service which connects Peninsula students, job seekers, apprentices and trainees to Melbourne's tertiary institutions. Three services are provided in the morning and evening.

Various authors have highlighted that place-based disadvantage, for example access to suitable public/private transport is associated with disengagement and

early school leaving, and is a critical issue for young people, particularly those on the Mornington Peninsula.

The Socio-Economic Index for areas (SEIFA index) for the Mornington Peninsula shows that the index for areas of Dromana-Safety Beach, Rosebud, Rosebud West, Tootgarook and Rye are worse than those for Australia, Victoria, greater Melbourne, and Melbourne's interface councils. Seventy-five per cent of Australia's suburbs have a better SEIFA index than the Southern Peninsula townships.

The refusal of Governments to fund PenBus or significantly improve public transport on the Southern Peninsula makes a mockery of one of the fundamental principles behind Plan Melbourne.

**Our Comment.** As indicated above many residents have to travel outside the area to work and are car dependent. This is unlikely to improve in the near future and together with the failure of governments to support PenBus is a strong indication that Plan Melbourne is fundamentally flawed.

Yours faithfully

Peninsula Speaks Inc