

28 September 2020

The Committee Manager
Legislative Assembly Environment and Planning Committee
Parliament House, Spring St
EAST MELBOURNE VIC 3002

**Re: Inquiry into Environmental Infrastructure for Growing Populations
– Legislative Assembly Environment and Planning Committee**

The *Council Alliance for a Sustainable Built Environment (CASBE)* is pleased to provide the following response to the **Inquiry into Environmental Infrastructure for Growing Populations**, specifically in reference to *Community access to parks and open space*.

[CASBE](#) is a collaborative alliance of Victorian councils committed to the creation of a sustainable built environment within and beyond their municipalities. Our focus is on applying widely accepted Environmentally Sustainable Development (ESD) principles to the built environment through the Victorian statutory planning system. CASBE has developed the *Built Environment Sustainability Scorecard (BESS)* - an online tool for assessing the sustainability of development proposals at planning stage. [BESS](#) provides a consistent assessment methodology for CASBE's *Sustainable Design Assessment in the Planning Process (SDAPP)* framework – an approach adopted by numerous Victorian councils.

[SDAPP](#) and BESS both consider not only whole of building environmental issues, but also encourage development applicants to consider site and surrounding natural environments that preserve and enhance urban ecology. Urban ecology is one of ten environmental categories within the BESS tool and SDAPP Framework. Principles covered in these categories include:

- The critical role that environmental infrastructure plays in securing and protecting biodiversity, wildlife habitat and waterways;
- The importance these spaces have for human amenity and liveability, including vital connections to nature;
- The role that environmental infrastructure has in ameliorating climate change impacts, including creating safe spaces for people and also habitats for wildlife during heat wave events, and how these spaces help mitigate the urban heat island effect.

To complement this work and address current sustainability gaps in greenfield subdivisions, CASBE in partnership with sixteen Victorian councils and the Victorian Planning Authority recently launched the *Sustainable Subdivisions Framework*. The Sustainable Subdivisions Framework provides a framework to assess sustainability measures in subdivision applications, which will be tested through an 18-month trial. The Sustainable Subdivisions Framework was developed as a state-wide replicable model through a collaboration of regional and growth area councils with a focus on greenfield subdivisions, however it can equally be applied to infill subdivision and precinct sites.

The Sustainable Subdivisions Framework includes a number of categories which relate to environmental infrastructure including:

- Site Layout and Liveability – which recognises the importance of access to open space and site responsive subdivision design which retains natural features (such as canopy vegetation) for incorporation into public open space and streetscapes.
- Streets and Public Realm – which recognises the critical role of developing a people focused local street network and public realm (including open space, including playgrounds, parks and sporting fields) to encourage walking and recreation whilst increasing biodiversity and mitigating the urban heat island effect.
- Ecology – which highlights how subdivisions can retain and enhance ecology to provide key ecosystem services including; habitat for wildlife, urban temperature regulation, runoff mitigation, food supply and recreational and aesthetic benefits.
- Integrated Water Management – which demonstrates how all aspects of the water cycle, including reduced water consumption, beneficial use of recycled and stormwater and water sensitive design can be integrated and collaboratively managed in subdivisions, which is critical to ensuring the future water security of our communities.
- Urban Heat – which recognises the need for urban heat mitigation strategies in subdivisions to cool the landscape and enable future residents to move safely and comfortably through the community without compromising their health and wellbeing.

Creating new high quality spaces

Acknowledging our states ever-growing population and the need to provide safe, healthy liveable neighbourhoods, it is clear that Victoria needs to create new high-quality environmental infrastructure. CASBE agrees that COVID-19 has further highlighted the importance of local access to open green space. This is reinforced by the '20-minute neighbourhood' concept within *Plan Melbourne 2017-2050*.

Many of CASBE's member councils have various council policies which relate to the creation and enhancement of existing environmental infrastructure. These range from individual Open Space Strategies, Biodiversity Strategies, Urban Forest Strategies, Greening Plans, Integrated Water Management Plans, etc.

Specific positive examples from CASBE members include:

- The provision of high quality urban green space in the [Arden Macaulay Renewal Precinct](#) which aligns creation of new urban parkland with increased population density.
- The [City of Moreland's A Park Close to Home](#) program which involved actively purchasing land and creating new urban parks across the municipality. Using funds from various streams including from Public Open Space contributions (via statutory planning applications), it is in the focussing on high priority areas which have a lack of existing parkland and open space as well as an increasing population density.
- The delivery of high-quality passive, active and conservation open space networks, which have been delivered and transferred into public ownership in the [Craigieburn growth corridor](#).
- Wodonga has recently adopted a [Regional Natural Environment Strategy](#) that recognises the importance of a thriving natural environment and connected community in supporting the liveability and prosperity of our region. The strategy establishes a long-term vision of a growing region that is leading the way in planning for and protecting a healthy natural environment and connected community.
- The [Wodonga Retained Environment Network Strategy](#) is an important piece of strategic planning for Wodonga's urban growth corridor. Prepared prior to development it identified key biodiversity features and values and sets out the long term protection of these values in

the context of urban development. This strategy was a key influence in the recent Precinct Structure Plan process for the corridor.

- [City of Melbourne Green Our City Strategic Action Plan 2017–2021](#) The Green Our City Strategic Action Plan was endorsed in 2017. The four-year plan aims to improve the quality and quantity of green roofs and vertical greening in the municipality to support amenity, liveability and adapt to climate change. By working to promote green roofs and vertical greening, City of Melbourne recognises that providing new green space in the central city is increasingly difficult, and that additional measures to support future greening targets for a growing population are required.
- The City of Melbourne is proposing an amendment to the [Melbourne Planning Scheme – Amendment C376: Sustainable Building Design](#). A key standard in Amendment C376 is the mandatory provision of on-lot green infrastructure for all new developments. To provide a metric for benchmarking and a design tool for practitioners, we have developed the Green Factor tool, an Australian first online platform for the use of developers, designers, decision makers and the community. The Green Factor tool encourages a greater quantity and quality of green infrastructure to be incorporated in building design through a range of options such as canopy trees, green roofs, vertical greening and other external landscaping. The Green Factor tool encourages designers to include green spaces that are publicly accessible and provide multiple benefits to occupants, users and visitors.

Positive state government examples include:

- The Victorian Government’s [Department of Environment, Water, Land and Planning’s Suburban Parks Program](#) and the creation of 25 new pocket parks and 16 new off-leash dog parks across Melbourne is a great example of creating new community access to parks and open space. It is recommended that this is expanded further, and more parkland created, as well as additional focus be given to enhancing Melbourne and Victoria’s forests, bushland, wildlife corridors and waterways.

CASBE members have also experienced scenarios when adequate environmental infrastructure has not been provided and community expectations not met, including:

- Some regional councils are not resourced to prepare Open Space Strategies which leads to ad hoc provision of open space which does not meet community needs. This can result in a mismatch between open space need and provision (e.g. an insufficient number of playgrounds in areas dominated by families), and in missed opportunities to deliver connected linear park network which promotes walking and cycling.
- Unlike metropolitan growth areas where high quality embellishment of open space provides a point of difference to support marketing of estates, regional areas often have a limited number of landowners/developers. Reduced competition can result in a minimum standard approach with the net effect being that open space is often perceived as an additional cost/liability to be provided rather than a core component of a well-designed subdivision and functioning community. Among the challenges from this minimum standards approach are:
 - Provision of encumbered land for public open space in new communities which is not fit for purpose and does not meet community expectations (e.g. sloping land containing drainage infrastructure which lacks embellishment or useability for functional purpose).
 - Shared usage of school recreation facilities for public open space purposes and associated liability to Council of providing open space on private land; further in not permanent public open space
 - A lack of site responsive design where open space fails to respond to and enhance environmental assets and in turn, to maximise the benefit to the community of high quality usable open spaces

- The Precinct Structure Plan (PSP) process across Melbourne enables and facilitates the wholesale removal of established trees, without any consideration for the lag-time associated with canopy growth in newly established suburbs.
- The lack of security of land, particularly the future tenure for land identified within by Biodiversity Conservation Strategy is a significant concern to member councils. Currently PSP processes only identify land for conservation but do not establish mechanisms to ensure that this land gets transferred or vested to a public authority. This is a significant risk, particularly for waterway conservation reserves, where the linear open space functions, could be undermined by the retention of this land in private ownership with s69 agreements under the *Conservation Forests and Land Act 1987*. The significant policy conflict between the objectives of the Biodiversity Conservation Strategy to protect land for conservation purposes, and broader open space objectives – such as Plan Melbourne, Waterways of the West, Healthy Waterways Strategy could be undermined by this process.
- Similarly, the abilities of communities to access high quality open space on connected active transport networks is a critical issue to address. Often there is a significant time lag between the establishment of new communities and connecting infrastructure on arterial and connector roads, or linear open spaces to the Public Transport nodes and the principle bicycle network – effectively isolating communities. Often this is due to a lack of priority of the delivery of walking and cycling infrastructure early in greenfield development processes.

Opportunities and suggested solutions:

Whilst CASBE acknowledges the need to create new environmental infrastructure, such as parks and open space, this is often extremely difficult for local government to implement. For example, the above mentioned [A Park Close to Home](#) program in Moreland City Council required council to purchase land in the open market at significant cost. Local governments across Victoria require assistance to create new environmental infrastructure and maintain it.

We are pleased to offer the following recommendations for the committee’s consideration.

1. State government opportunities

We draw your attention to various aligning Victorian State Government strategies, programs and goals. For example, the *Healthy Waterways Strategy 2018 – 2028* acknowledges the importance of waterways and wildlife corridors not only for their environmental value but also their role in improving liveability and human connection to nature. Similarly, the *Protecting Victoria’s Environment - Biodiversity 2037* plan acknowledges the significant threats to Victoria’s natural environment and further recognises its contribution to the liveability of our communities and cities.

CASBE offers the following recommendations on this issue:

- Provide open space legacy outcomes as part of the state governments wide-ranging infrastructure projects. For example, of relevance to Stonnington would be transport projects and housing estate renewals.
- Assess and fast track how state government land could be better used, freed up or shared for the purposes of public open space or access to public open space.

2. Funding programs for local government

CASBE offers the following recommendations on this issue:

- Provide a new ongoing funding stream for local government, that is available for each council, and is not subject to a competitive council bidding process.
- Provide more funding to increase the quantity of open space in local government areas (LGAs). Initial focus should be on LGAs with the lowest amounts of open space per capita.

- Provide more funding to improve the quality of open space in LGAs. This would include adapting existing open spaces to better meet needs of future populations.

3. Support for the Sustainable Subdivisions Framework

The Sustainable Subdivisions Framework provides a significant opportunity to improve environmental infrastructure for growing populations.

CASBE offers the following recommendations on this issue:

- That the Committee consider the [Sustainable Subdivisions Framework](#) and associated resources in this Inquiry and the role it can play in improving environmental infrastructure in existing and emerging communities;
- That the Committee acknowledge the 18 month trial of the Sustainable Subdivision Framework;
- That the Committee recommend investment to support councils and developers undertake the trial to the fullest possible; and
- That the Committee follow the progress of the trial and based on its success, consider implementing the Sustainable Subdivisions Framework through changes to the Planning Policy Framework.

For more information, see:

<https://www.casbe.org.au/what-we-do/sustainable-subdivisions/>

<https://www.casbe.org.au/resources/sustainable-subdivisions-resources/>

4. Protection of existing infrastructure

Increased urbanisation and densification continue to impact the quality and biodiversity function of existing forests, grasslands, bushland, wildlife corridors and waterways. CASBE is eager to see these spaces not only protected but supported and further enhanced. For example, many of metropolitan Melbourne's urban waterways and habitat are in extremely degraded conditions. Concurrently, existing waterways, wildlife corridors, grasslands, scattered trees, forest and bushland are under increasing pressure, such as waterways around the Urban Growth Boundary in outer-Melbourne.

Preserving existing environmental infrastructure can safeguard ecosystem services and support human health, through the direct impact on reduction of air pollution for example. These benefits are invaluable.

CASBE offers the following recommendation on this issue:

- It is vital that the Parliamentary Inquiry focus not only on parks, open space and sporting fields and the creation of new spaces, but also on ensuring that existing forest, bushland, grasslands, scattered trees, wildlife corridors and waterways continue to be protected and enhanced.

5. Increased resourcing for existing land management agencies.

Local government also recognise the need for increased resourcing for land management agencies that care for and support green spaces within our municipalities. This includes Parks Victoria, voluntary Committees of Management, Cemetery Trusts, public and private schools and tertiary institutions, water authorities, road and rail authorities and many more. It is investment across all land managers and land tenures that is needed to improving green infrastructure in our state.

CASBE offers the following recommendation on this issue:

- Ensure that adequate funding is provided for existing land management agencies working across metropolitan and regional areas.

**6. Supporting provision of environmental infrastructure in regional areas.
and**

7. Protecting high value conservation areas.

Environmental assets are under similar pressure in regional areas, where greenfield development and agricultural and extractive practices are clearing and fragmenting existing bushland and habitat and accelerating the degradation of soil and water.

Protecting and enhancing environmental values is not only important for its intrinsic value and human health, it underpins two of Victoria's most significant drivers of jobs and economic growth – agriculture and tourism. This is particularly important in regional areas.

As Victoria's population grows and development further encroaches on natural areas balancing the recreational, tourism, health and wellbeing benefits of natural areas with vital environmental outcomes will become an increasingly difficult challenge.

CASBE draws attention to the *Green Building Council of Australia's* requirement that any Green Star project must meet a mandatory conditional requirement that the site must not include old growth forest; prime agricultural land; a wetland of 'High National Importance'; or Impact on 'Matters of National Significance'). The Inquiry's attention is drawn to this as there is much existing environmental infrastructure in Victoria, including old growth forest, wetlands and other significant areas which provide significant amenity as open space and parkland for people (and habitat), which are under threat. This includes the continuing decline and loss of Victoria's old growth forest. When old growth forest is lost, not only is critical and irreplaceable biodiversity and habitat lost, the potential for human interaction with nature is also lost. This is of concern to CASBE member councils and people living and working within our member councils' municipalities.

CASBE offers the following recommendation on this issue:

- Ensure communities have access to adequate, diverse and fit for purpose open spaces and recreational infrastructure within urban areas (new and existing) as this is an important component of managing the increased pressure for recreational access to natural areas.

Conclusion

In conclusion, CASBE strongly supports the Legislative Assembly Environment and Planning Committee's investigations into securing environmental infrastructure for Melbourne and regional Victoria, now and into the future. We acknowledge the need to both protect existing and create new parks, open space, sporting fields, forest and bushland, wildlife corridors and waterways.

CASBE would be delighted to expand on any of the above. Please contact me if you wish to discuss this matter further on 9667 5555.

Yours sincerely

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