

MASTERS OF OUR INDUSTRY

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Ms Robyn Hellman
Coordinator Local Policy
Strategic Planning, City of Melbourne
PO Box 1603
MELBOURNE VIC 3001

Dear Ms Hellman

Melbourne Planning Scheme – Amendment C209

Master Builders has significant concerns in regards to Amendment C209 to the Melbourne Planning Scheme.

Our organisation represents some 9000 builders, subcontractors, manufacturers, suppliers and students. We are the peak body representing both residential and commercial builders in Victoria and are uniquely placed to provide comment on the City's proposed amendment.

The proposal to impose a mandated open space contribution for developments within the City of Melbourne of 5 to 8 per cent could threaten the viability of construction projects in the inner city and the CBD. This has significant consequences for:

- Employment in our industry, which is Victoria's second largest source of full-time jobs;
- Investment in new and upgraded buildings throughout the municipality;
- Driving up the costs for new developments, thereby having a negative impact on housing affordability.

There is no doubt that open spaces provide a vital role in Melbourne retaining its prestigious position as one of the world's most liveable cities, but the provision of open spaces should be a shared responsibility between developers, council and government. This amendment shifts the balance of responsibility too far towards developers. Should it proceed, the City of Melbourne should provide suitable accountability measures that can be publicly released that shows income generated through this measure is quarantined and how it has been expended on open space provisions.

Further, the amendment does not outline what new open spaces are required within the municipality. Master Builders contends that residents and visitors in the City of Melbourne can already access some of the world's leading open spaces and recreational amenities, right in the heart of the broader city, including:

- Alexandra Gardens;
- Birrarung Marr;
- Carlton Gardens;
- Docklands Park;
- Fawkner Park;
- Fitzroy Gardens;
- Flagstaff Gardens;
- JJ Holland Park;
- Kings Domain;
- Princes Park;
- Queen Victoria Gardens;
- Royal Botanic Gardens;
- Royal Park;
- Treasury Gardens; and
- Westgate Park.

In addition, we also have places like Federation Square, the Melbourne Cricket Garden, Melbourne Park, the State Library, Melbourne Zoo and other squares, waterways such as Victoria Harbour and the Yarra River and plazas too. Unfortunately the City of Melbourne's open space strategy seems to only acknowledge council assets, without recognition for these broader open spaces.

In total, the City of Melbourne manages more than 500 hectares of open space, which accounts for nearly 15 per cent of the total municipality. While the City's Open Space Strategy earmarks a range of new open spaces it wishes to create, there is no funding by either the City of Melbourne or other levels of government earmarked to meet this aim.

People from right across our city, our state, our nation and beyond all access the open spaces listed above, the same way they access our freeways and arterial road network. The State Government is responsible for funding these links as they have benefits beyond any one direct community and instead deliver positive outcomes for our much broader society. In the case of this amendment, council seeks to declare that it solely the responsibility of the building and development industry and their intended customers to fund future open spaces or upgrades to existing open space assets.

The proposed amendment fails to account for or acknowledge the important role private open spaces will play in ensuring residents in the municipality can access quality recreation, boost health and wellbeing, support cultural character and enhance liveability. This is a serious oversight. The City of Melbourne should look to encourage and incentivise the provision of private open space as part of developments within the municipality.

The building and development industry has suffered greatly in tough economic conditions. Imposing additional requirements will erode already extremely tight margins in our industry. Regulations like this stifle innovation and I am confident that by working closer together, we can identify solutions that meet the needs of council and our industry, rather than current proposal which seeks to slap a great big new tax on developments in the inner city. This should include both indoor and rooftop open space facilities.

The Victorian Government is currently undertaking a review of the state's development contributions framework so there is greater consistency across municipal borders. Our members are already frustrated that each time they step foot from one council's jurisdiction into another, they must throw out the old rule book and find a new rule book. Approval of the proposed amendment simply adds another point of difference between the City of Melbourne and other municipalities and comes before the State Government has had the opportunity to release its final framework.

In the strongest possible terms, Master Builders urges the City of Melbourne to abandon Amendment C209 and seek out a more sensible arrangement to cater for open spaces throughout the municipality.

Yours sincerely



Brian Welch
Executive Director

cc. The Right Hon Robert Doyle, Lord Mayor, City of Melbourne
cc. The Hon Matthew Guy MP, Minister for Planning