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**Comment on the draft**  
**Metropolitan Planning Strategy for Melbourne**  
**March, 2013**

SUMMARY

SOS believes that the MPS public consultation process has been ineffective in educating the community about the planning issues facing Melbourne well enough to enable them to suggest logical and realistic solutions (as opposed to merely being able to comment on the predetermined options presented to them in the draft MPS).

We regard most of the current planning reforms, including the MPS, as pre-determined deregulation - the antithesis of what is needed to democratically curb the excesses of market forces and guide them to deliver built form in the long-term community interest (as per the Planning Act), or to deal effectively with the growing issues of sustainability which the city (and the nation) faces.

THE CONSULTATION PROCESS FOR THE MPS

SOS is highly critical of the public consultation process, not just for the Metro Planning Strategy (MPS) but for all the planning reforms conducted by the State Government since 2010. No independent or critical planning professionals were encouraged or engaged to formally contribute to the public debate with a variety of facts, views and alternative solutions to those outlined in the draft MPS – which is little more than a series of motherhood statements devoid of a solid strategic research base.

The DPCD website devoted to launching the public “debate and consultation” on the new MPS was notable for its lack of relevant facts, particularly to enable any identification of trends over time or in relation to vital strategic concepts such as the spatial and economic function of activity centres.

As veteran planner Alan Davies put it, “It reads like no one in DPCD actually has any real idea how planning relates to the economy”.

<http://blogs.crikey.com.au/theurbanist/2012/05/08/is-melbournes-metropolitan-strategy-off-to-a-bad-start/>

To cap off the “public consultation”, a major forum at Docklands was held on March 2 (until early February still being advertised for the original date of Feb.23). For months, the public at large had had the (largely un-publicised) opportunity to register for the vaguely promised “consultation events in early 2013” but those who registered for these events (there was only one) weren’t notified about it until less than 3 weeks beforehand. Replies to those who RSVP’d weren’t sent out in some cases until a day or so beforehand.

This incompetent process resulted city-wide in only a few hundred takers so in the last two weeks, a market research company was hired to offer \$50 a head to its thousands of focus group contacts to attend the forum. DPCD subsequently offered their direct participants the same incentive.

The Docklands venue seats 1,000 but most tables were not full and those who went estimated attendance at about 650– still an extra cost of over \$32,000 to taxpayers in order to run a stage-managed “consultation” event where it was pre-determined not only what the topics would be but what line would be taken on each.

The main focus of the Forum was the “20-minute city – living locally”. It was not presented as a topic to be debated but as a foundation principle of the draft MPS to be sold to the audience. But it is a meaningless motherhood concept which appears to be an excuse to assist the implementation of the new planning zones, with their deregulatory blurred distinctions which will hamstring council efforts to control the appropriate location of land use activities and to protect residential amenity.

To quote Alan Davies again, “Paradoxically, we’ve already got it (the 20-minute city) and it’s unachievable. We’ve already got it because there are very few places in Melbourne, even the outer suburbs, where you can’t already get to a supermarket, hair-dresser or GP within a 20 minute drive.....On the other hand, it’s unachievable because there are some higher-level activities that simply can’t be distributed evenly across the entire metropolitan area so that they’re within a short walk, bus ride or drive of almost every household.”

“The implicit idea that a key mission of planning in a city of four, five or six million people is to promote “living locally” as the headline objective is to misunderstand what a city is about. Cities offer specialisation and that means higher level activities aren’t evenly spread in the way that hairdressers and supermarkets are, but tend to be geographically concentrated.”

<http://blogs.crikey.com.au/theurbanist/2012/12/03/should-the-20-minute-city-be-the-key-objective-of-planning/>

If the government were serious about consulting the community and taking on board its suggestions and priorities, there would have been an initial broad consultation phase to encourage community and independent expert input to help scope the goals of a new strategic direction for the city. This has been successfully done before, for example in Perth and Vancouver, to mention two well-known examples.

With an overall master plan complete, work could have commenced to reform zone provisions and other aspects of the planning regime so as to give effect to the strategy.

Instead, VicSmart, the new zones and changes to the Planning Act were finalized first. This only makes sense in the context of the existence of a pre-determined plan to

extend the scope of traditional economic activity with little consideration of the implications for infrastructure, residential amenity, and social and environmental factors.

In fact, these moves in Victoria are being mirrored in NSW as part of a nation-wide push to adopt the less democratic Development Assessment Forum model of urban planning.

## WHAT THE MPS SHOULD ENCOMPASS

Given the above analysis, SOS believes there is little point in bothering to outline all the issues that the MPS should address.

However, it is self-evident (and reflected in feedback from the Melbourne 2030 consultation process) that the community's highest planning priority, growing stronger by the day, is for the improvement of all aspects of public transport, to improve the functionality of suburbs and reduce traffic congestion. That means more rail, not road. This is underlined by the Downs-Thomson Paradox, which states that the equilibrium speed of car traffic on the road network is determined by the average door-to-door speed of equivalent journeys by rail-based public transport.

Expanding a road system as a remedy to congestion is not only ineffective but often counterproductive. It can actually make overall congestion on the road worse because the reduction in public transport use results in a reduction in frequency of service and/or increase in fares. This in turn pushes additional rail passengers into cars and congestion on the expanded road system soon becomes worse than before.

Downs' theory of "triple convergence" explains the difficulty of removing peak-hour congestion from highways. In response to expanded arterial road capacity, three immediate effects occur: drivers using alternative routes begin to use the expanded highway, those previously traveling at off-peak times shift to the peak period, and public transport users return to driving their vehicles (as explained above) – guaranteeing a rise in private vehicle use and further congestion and new bottlenecks.

This is just the most obvious example of the failure to base the debate over the new Metro Planning Strategy on adequate rigorous research and strategic analysis.

Another serious omission is any rigorous discussion of possible methods of infrastructure funding (although there has been a suggestion of an extra tax on residents of existing suburbs currently well-served by infrastructure and services).

Infrastructure has been poorly resourced over the last few decades, a shortfall that must be addressed with immediate priority if residential amenity and even basic services are to be maintained. The State Government must consider debt funding of infrastructure projects, including integrated public transport initiatives.

Particularly during an economic downturn, equity markets are likely to be interested in stable returns that allow communities to invest in their own futures (as the M2030 Audit pointed out in 2008). Industry is likely to prefer the state to fund public

infrastructure through government debt rather than taxes and user charges, because debt financing delivers broader economic benefits like employment without impacting on good management.

This approach also matches costs to community benefits over time. For example, quantitative analysis by the Allen Consulting Group in 2004 for the Property Council of Australia\* indicated that:

- *Government at state and local levels should acknowledge that re-capitalising our cities is essential to maintain and enhance economic, social and environmental sustainability.*
- *The case for the greater use of government debt is strong.*
- *Fundamental public finance arrangements need to be revisited.*
- *The trend towards ad hoc wasteful infrastructure funding techniques should stop.*

Allen also warned that reluctance to use government financing could prove very expensive over time because there is more risk to economic prosperity and personal safety from under-investment in infrastructure. Failure to mobilise resources into public infrastructure would constrain economic opportunities and thus impact on the livability of urban areas central to competitiveness and sustainability – a negative trend that arguably we are now experiencing.

\*Allen Consulting Group 2004, *Financing Public Infrastructure in Victoria: A comparison of approaches, Report to The Property Council of Australia (Vic), Sydney.*  
[www.propertyoz.com.au/vic/Allens%20Consulting%20Infrastructure%20Victoria.pdf](http://www.propertyoz.com.au/vic/Allens%20Consulting%20Infrastructure%20Victoria.pdf)

## CONCLUSION

SOS is aware of a number of submissions on the MPS by other community groups and generally endorses their comments. However, we are not prepared to waste further time participating in a process underpinned by little objective or rigorous strategic research and analysis, and a process where proper deliberative consultation has been absent.

In closing, we note that a series of simplistic “feel-good” questions and statements were posed during the March 2 Forum for immediate feedback. One in particular was posed both at the beginning and the end of the Forum (to gauge how well attendees had warmed to the topic): *“In 25 years I’ll be able to recommend Melbourne to others as a great place to live and work”*.

At the start of the Forum, 45% of attendees weren’t sure they agreed. Despite only one speaker per topic supporting the line of the draft MPS (scoped last year with no community input), ironically by the end of the Forum the response had not fallen as the organisers expected but actually risen to 47%.

That growing uncertainty is an apt reflection of the “community consultation” phase of the drafting of the MPS which virtually guarantees continued community dissent and dissatisfaction, not only with changes to the planning regime but also because the lay community continues to be effectively side-lined from any effective participation in formulating a democratic planning strategy for the future of their own city.

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