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ABN 68 574 787 924 (SunRRA is not registered for GST)

The Secretary  
Victorian Environmental Assessment Council  
Level 6  
8 Nicholson St.  
East Melbourne  
VIC 3002

Attached please find a submission from the Sunshine Residents and Ratepayers Association (SunRRA) Inc. responding to a number of matters raised in the Council's investigation of Crown land and public authority land in 29 municipalities in metropolitan Melbourne.

SunRRA advocates on behalf of people living in Brimbank Council's Harvester Ward - one of Melbourne's most disadvantaged wards.

In supporting and empowering severely disadvantaged communities to correct long term access to open space problems, VEAC can help community groups in the area and Brimbank Council start a process of significant inter generational change aimed at ultimately breaking down ongoing cycles of disadvantage.

SunRRA believes it is vitally important that the children and families of the area are able to access an affordable, quality open space destination within walking distance of their homes. Currently the development of children in their early years and families in general is being stifled by very limited opportunities to access quality open space, parks and playground environments.

Brimbank Council currently has an inadequate *Creating Better Parks* policy and plan for some improvements in Harvester Ward. Despite community feedback it fails to properly address the Ward's significant open space accessibility issues. It is worth noting that Council when developing its new policy and plan, did not take up many of SunRRA's Nov. 2008 suggestions to improve community access e.g. strategic procurement of school sites nominated for closure, upgraded facilities and infrastructure at the very limited number of current parks and playgrounds in the Ward to ensure a quality experience.

SunRRA does however support much of Brimbank Council's current submission to VEAC. For example, it supports Council's view of the importance of public land to community well-being and it being made available free of charge to community or be made available at substantially reduced rates. SunRRA again feels Council needs to go further in a number of areas of its thinking e.g. Council's draft submission again makes no specific mention of reclaiming school sites to fill existing gaps in open space.

The people of Brimbank's Harvester Ward therefore need strong leadership from VEAC to introduce a set of recommendations that include strong principles, measurable objectives and operational systems that can significantly assist our children and their families have a healthy, liveable and sustainable community into the future.

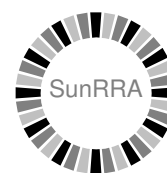
Without that strong and committed leadership and direction the 60 year cycles of inter generational disadvantage in Harvester Ward can be expected to continue unabated (and most likely worsen considerably) as housing and population densities rise in an area already significantly under provided with access to open space, parks playgrounds and community services.

Yours Sincerely

Darlene Reilly

10 January 2011

**Sunshine Residents and Rate Payers  
Association Inc., (SunRRA)**



**Submission to VEAC in response to its  
"Metropolitan Melbourne Investigation  
Discussion Paper"  
10 January 2011**

## **1. Preamble**

Public land in the Sunshine area is scarce and its long term community accessibility is under threat. Large tracts of land are in the hands of VicRoads and VicTrack. The parcels of land are being rapidly developed as new train and road arteries are put in place to meet the demands of a growing population and higher density housing.

As parcels of public land at schools become earmarked for closure, conversations between administrators, politicians and their advisors and developers begin and scarce public land is again under threat. Community views and needs are second order priorities.

Brimbank Council's *Creating Better Parks* policy and plan openly acknowledges the long term neglect of parks and playgrounds in the municipality and their poor quality. The plan also identifies significant gaps in quality open space in some parts of the municipality e.g. Harvester Ward.

The suburb of Sunshine is located in Harvester Ward. It is deemed an Activity Centre and population growth, higher housing densities and further economic development are all being planned for. **Planning aimed at increasing community access to benchmarked levels of quality open space is not occurring at a Harvester Ward level. Long overdue maintenance of infrastructure within existing long neglected parks and playgrounds is the main game.** There is a growing community wide sense of hopelessness for the future of open spaces in Sunshine despite the Council's glossy plans and public announcements.

The Sunshine community values its scarce public land highly and is continually looking for ways to fill the big existing gaps in access to quality open space opportunities in Harvester Ward.

The Ardeer community has shown the way with a grass roots community development approach to converting a contaminated land site into an ever improving community park highly valued and "owned" by local residents. The playground group virtually shamed the now sacked Brimbank Council into taking action on its parks and playgrounds.

The Friends of Kororoit Creek Group has been active for many years and it has made a major contribution to the liveability of Brimbank with its successful

advocacy efforts. Brimbank Council to its credit has been very supportive of the group.

Another community campaign aimed at procuring the old Sunvale school site for use as a community park has been running for over two years and is led by Respect the West and SunRRA community groups. The future use of the site is currently being determined. The community vision for the site and the Council vision are quite different.

The Friends of H.V. McKay Memorial Park have also been campaigning for the transfer of VicTrack land leased to Brimbank Council for some of the Park's historical gardens. SunRRA supports both the Friends group and Sunshine Historical Society's advocacy for the land transfer in order to ensure the Park's long term future.

There are a number of other community groups and unions who have advocated and fought for better community outcomes in Sunshine and surrounding areas. The problem that this disadvantaged community constantly faces is that many in positions of power see its problems as "too hard" and do not put in place the frameworks and resources needed to support meaningful long term change.

SunRRA believes the lack of strong long term leadership and the current absence of a sustainable *Healthy Parks, Healthy People* culture within Brimbank Council has been one significant determinant of a number of poor community outcomes e.g. low educational attainment outcomes, poor physical and mental health outcomes.

The situation has not been helped by decades of poor political representation by western suburbs MP's who accepted that a "neglect of the west's safe political seats" was a standard norm and the prioritising of resources to "marginal seats" in other less needy communities was the standard practice.

Developer centric political factions and the developer sponsored local Councillors resulted in weak planning and administration in Brimbank. Developers have paid previous Council's large sums of money to exclude open space requirements from their development plans and include more housing. Poor community outcomes abound.

Political and personal needs have long been put before community needs in the western suburbs by our MP's. The recent Ombudsman's review of Brimbank Council that led to its sacking showed the tip of the iceberg known in this community as "political interference".

The appointment of Administrators to Brimbank Council has in a general sense been a breath of fresh air but is not without its problems. The Administrators handling of the preferred future use of the Sunvale school site issue is a moot point. Old practices die hard in Brimbank. The empowerment of a more democratic and transparent community led Council supported and able to introduce a sustainable and liveable future is the next big political challenge.

Strong legislative, policy and operational frameworks therefore need to be implemented to protect needy communities across Melbourne from the avarice and corruption that can come about when politics, commerce, opportunity and community outcomes interact. Public land management is one of the areas needing these strong protections.

SunRRA's view is that before any significant cultural change can occur in Brimbank Council's senior leadership group and its Parks and Gardens section a targeted, externally driven approach to mentoring and capacity building at strategic and operational levels will be needed. Parks Victoria is the obvious organisation to lead the provision of that mentoring and capacity building support.

## 2. Liveability and open space in Sunshine

SunRRA's role is to advocate for better and more equitable services and facilities for the residents and ratepayers of Harvester Ward in the City of Brimbank - one of Melbourne's most disadvantaged areas.

(Harvester Ward encompasses many suburbs that SunRRA brings together and calls "Sunshine" e.g. Ardeer, Brooklyn, Albion, north Sunshine, West Sunshine, central Sunshine, east Sunshine.)

The poor levels of access to developmental opportunities provided by quality open spaces, parks and playgrounds in Harvester Ward are no accident - they are man made problems. The problems have been created through:

- lack of long term vision
- political interference in neighbourhood development
- decades of poor planning
- addition of more and more affordable housing for new settlers
- provision of poor levels of low quality community infrastructure
- successive developer centric Council administrations and MP's, and,
- a level of acceptance from elected representatives and senior officials that inter generational cycles of disadvantage are "too hard" to change.

In the BankWest Quality of Life Index published in 2008, Brimbank's liveability is ranked 74th worst of 79 LGA's in Victoria with Sunshine and surrounding suburbs all with lowest liveability within Brimbank itself.

[http://www.bankwest.com.au/Media\\_Centre/Bankwest\\_Research/Bankwest\\_Quality\\_of\\_Life\\_Index\\_2008/index.aspx](http://www.bankwest.com.au/Media_Centre/Bankwest_Research/Bankwest_Quality_of_Life_Index_2008/index.aspx)

[http://www.bankwest.com.au/library/scripts/objectifyMedia.aspx?file=pdf/42/99.pdf&str\\_title=Quality of Life Report 2008 - VIC.pdf](http://www.bankwest.com.au/library/scripts/objectifyMedia.aspx?file=pdf/42/99.pdf&str_title=Quality_of_Life_Report_2008_-_VIC.pdf)

Harvester Ward is openly acknowledged as Brimbank's most disadvantaged area. SunRRA's submission to Brimbank Council's Creating Better Parks policy and plan demonstrates this.

[http://www.sunshine.asn.au/component/option,com\\_remository/Itemid,50/func,fileinfo/id,190/](http://www.sunshine.asn.au/component/option,com_remository/Itemid,50/func,fileinfo/id,190/)

SunRRA welcomes VEAC's focus on protecting public land and improving liveability for Melburnians and looks forward to working closely with VEAC and its partners to improve the Sunshine community's liveability and in particular its access to quality open spaces, parks and playgrounds.

SunRRA members have long identified that for the past 60 years in Harvester Ward there has been a high concentration of affordable housing built for new settlers.

The Sunshine community is now a vibrant multi cultural one but as stated earlier it has poor levels of access to the services and infrastructure most communities take for granted e.g. parks, playgrounds and open space. "*Healthy parks, Healthy people*" is Parks Victoria's catchcry but in Sunshine that outcome is not yet a reality.

Sunshine has major gaps in good standard community infrastructure like useable parks and playgrounds; performing arts venues; community halls; sport, recreation and leisure facilities, and, active transport opportunities. Sunshine's built and natural environments are sadly lacking in comparison to most other

parts of Melbourne with its train station and main shopping centre real community eyesores.

These liveability issues have a negative impact on community self esteem and individual self esteem and affect the development of children and families in the area. They also feed into trans generational cycles of disadvantage at community, family and individual levels.

The social infrastructure necessary for strong service provision and neighbourhood connection is also sadly lacking particularly when the area is one where many waves of new settlers have been accommodated in their first place of residence in Australia.

The outcomes of a densely housed but poorly serviced community are there for all to see in health and wellbeing, education and training, liveability and income and employment profiles. The evidence shows why a new "whole of community" approach to planning for better social, economic, environmental and transport outcomes is much needed in both older and newer communities alike.

SunRRA believes the Sunshine community's lack of access to quality open space experiences is one of the significant determinants of disadvantage and poor health and wellbeing outcomes in the area.

It is looking forward to VEAC's strong leadership making a real difference to the future sustainability and liveability of our community and empowering us to take charge of the future for our children and families.

SunRRA's firmly believes that these man made problems can be fixed by introducing a good quality medium term strategy for the area and then enacting it rigorously. A strong "can do" attitude is required from those at the highest levels of power and influence in this community.

### 3. Poor community outcomes

The gross imbalance between the built and natural environments in Harvester Ward is clearly reflected in community health and wellbeing profiles that show physical and mental health issues are among the worst in the state.

Key indicators such as:

- poor community infrastructure
- poor transport services
- low levels of open space
- relatively high density affordable housing
- lack of places for artistic expression
- lower than average educational outcomes
- higher than average unemployment and welfare levels
- lower than average income levels
- very poor community health and wellbeing outcomes
- high gambling losses and
- a Council and MP's lacking vision on how to break out of the cycles of disadvantage

all point to a less than rosy future for the future generations of children and families that will live in this community unless much stronger community wide interventions are introduced.

SunRRA believes it is vitally important that the children and families of the area are able to access an affordable, quality open space destination within walking distance of their homes.

Currently, the development of children in their early years, and, families in general, is being stifled by a lack of access and an unequal opportunity to enjoy the benefits of quality open space, parks and playground environments.

Children and youth in the Sunshine area know that there are significant differences between the east and west of Melbourne in terms of access to quality parks, playgrounds and recreation opportunities and this creates significant self esteem and community pride issues.

Brimbank Council has an inadequate *Creating Better Parks* policy and plan for some basic maintenance and playground improvements in Harvester Ward. It fails to properly address the Ward's significant open space accessibility issues.

It is worth noting that Council did not take up in its new policy and plan many of SunRRA's November 2008 suggestions to improve community access e.g. strategic procurement of school sites nominated for closure to improve access, upgraded facilities and infrastructure at the very limited number of current parks and playgrounds.

According to Brimbank Council documents, Brimbank has 1872 hectares of open space on Crown, public authority and local council owned land.

It has 9.7 hectares of open space per thousand people. The median for the VEAC investigation area is 7.0 hectares per thousand people.

**The LGA analysis VEAC has conducted masks severe access problems at the Ward level in Brimbank (and probably other Councils).**

Brimbank Council, in its *Creating Better Parks policy and plan*, openly acknowledges the differences in rates of access to open space between wards. Harvester Ward is severely disadvantaged with few quality open space, parks and playground opportunities however its "comparative" access rate with Brimbank's four other Wards is still not known. Council is making no transparent effort to improve access for Harvester Ward residents to agreed open space benchmark levels.

Brimbank Council leaders are also currently failing to acknowledge the future impact of Council's weak *Creating Better Parks policy and plan* and the very limited set of actions being implemented to address the significant under provision of quality open space opportunities in Harvester Ward / Sunshine.

The leaders are also failing to openly acknowledge that their weak open space policy and plan is very likely to contribute further to Harvester Ward's poor future community outcomes in areas such as:

- Physical health
- Mental health
- Social capital
- Stimulated and sustainable economies
- Environmentally sustainable urban areas and
- Artistic expression and cultural diversity.

This problem is exacerbated when the community's Federal MP in waiting Nicola Roxon stated recently in the media that the issue "neglect of the west" was a theme that did not resonate with community at the recent Victorian elections despite swings of over 10% in the area.

The worry for Harvester Ward / Sunshine residents is that Ms Roxon is the Minister for Health with responsibility for improving population health and wellbeing outcomes, reducing health inequalities and overseeing a "Healthy Communities" program across the nation. There seems to be no recognition of the negative impacts of many of the determinants of health on her own electorate.

The widening sense of hopelessness about the future liveability and community wellbeing of Sunshine being felt by residents is being fed by comments like these. People are feeling that inter generational cycles of disadvantage in this community are being reinforced by the attitudes of politicians and administrators concerned more by power and influence than addressing priority community needs.

### **3. Sunvale School site – Community Vision**

The Sunshine community has a vision for the future use of the old Sunvale School site. The vision has been developed at public rallies for a Sunvale Community Park and in Council's community consultations.

It differs from Brimbank Council's position and the previous Brumby government's position which called for further affordable housing developments without adequate provision of already under supplied community infrastructure.

The community's vision was supported by Liberal candidates at the recent State election but was not supported by the ALP candidates.

The community vision aims to address:

- poor community health and wellbeing outcomes
- lack of social connection
- lack of active recreation and leisure opportunities
- community pride and self esteem
- disconnected youth
- local food security issues
- current gaps in community infrastructure and meeting places
- poor local access to useable parks, playgrounds and open spaces and
- lack of community connection with the local indigenous community's history

The VEAC Discussion Paper demonstrates the value of public land and open space including the value of school sites. The closure of the local Sunvale school site provides a once in a lifetime opportunity for the Brimbank Council and state and federal governments to make a real difference by developing a decent park in Sunshine for active and passive recreation and leisure.

In a recent letter published in The Age on 24 December 2010 a SunRRA member suggested it would be highly symbolic for the new Baillieu government to demonstrate both its planning and social development credentials by endorsing development of a new community park in Sunshine on the old Sunvale school site. It would be equally symbolic for the Federal Gillard government.

A new park that can significantly improve social and environmental outcomes; create closer links with the indigenous history and community; start to break down inter generational disadvantage, and enhance the area's longer term liveability and outcomes for the generations of new settlers still to come.

SunRRA understands that VicUrban is the front runner to acquire the land and then develop most of it for affordable housing. SunRRA has requested that the Baillieu government intervene and put a moratorium on the sale of this scarce and highly valuable piece of public land.

SunRRA welcomes VEAC's suggestion that in future surplus public land be handed back to community at no cost or negligible cost as it understands that a number of secondary schools in the area are planned for closure and a new "super secondary school" is being planned. The current requirement for procurement of the land at (or better than) the Valuer General's valuation is a significant barrier to Council / community procurement of the Sunvale site and any other future school site that may become available.

In supporting and empowering severely disadvantaged communities like ours to correct long term access to open space problems, VEAC can help community groups in the area and Brimbank Council start a process of significant inter generational change aimed at ultimately breaking down ongoing cycles of disadvantage.

SunRRA does however support much of Brimbank Council's current submission to VEAC. For example, it supports Council's view of the importance of public land to community well-being and it being made available free of charge to community or be made available at substantially reduced rates. SunRRA again feels Council needs to go further in a number of areas of its thinking e.g. Council's draft submission again makes no specific mention of reclaiming school sites to fill existing gaps in open space.

The people of Brimbank's Harvester Ward therefore need strong leadership from VEAC to introduce recommendations incorporating strong principles, measurable objectives and operational systems that can significantly assist our children and their families have a healthy, liveable and sustainable community into the future.

Without that strong and committed leadership the 60 year cycles of inter generational disadvantage in Harvester Ward can be expected to continue unabated (and most likely worsen considerably) as housing and population densities rise in an area already significantly under provided with access to open space, parks playgrounds and community services.

#### **4. VEAC Discussion Paper – SunRRA’s views on draft comments and recommendations**

As stated previously, SunRRA warmly welcomes VEAC’s timely investigation of public land use across Melbourne and the general focus of the Discussion Paper.

It welcomes the opportunity to have a say and fully supports the Discussion Paper’s commentary on prior Community Views (pp.12-14) on:

- uses, resources, conditions, and values of public land
- open space
- biodiversity conservation
- recreational opportunities
- cultural and heritage values of public land
- climate change and sustainability
- fire-risk management
- public land governance
- inappropriate use of public land
- disposal of public land and
- population growth.

They are in essence SunRRA’s views also.

There are however some gaps that have been identified by both SunRRA and Brimbank Council in its submission to VEAC. They are as follows:

- masking of under provision of open space opportunities at Council ward levels by use of LGA level benchmark analysis only. A combined Ward and LGA level benchmarking analysis is essential if principles such as equity, sustainability and access are to be fairly implemented in future strategic plan.
- stronger more effective use of interim community / Council interim Committees of Management when surplus public land is identified
- strong trusting collaborative partnerships between VEAC, its partners, Councils and communities will be needed in the future
- process for disposal of public owned land - the prohibitive cost to Council’s of procuring available surplus public land is a major barrier to improving equity and turning around poor community outcomes. SunRRA supports Council’s position and has made suggested changes to the Recommendations in the section below
- disposal of public owned land – SunRRA supports the Brimbank Council position
- multiple use of public land – SunRRA supports the Brimbank Council position
- development of a metro wide approach to open space provision - SunRRA supports the Brimbank Council position
- the importance of open space quality - SunRRA supports the Brimbank Council position
- Sydenham Park - SunRRA supports the Brimbank Council position
- accuracy of mapping - SunRRA supports the Brimbank Council position
- biodiversity in metro Melbourne - SunRRA supports the Brimbank Council position

SunRRA also feels that the policy scope of the investigation should also have included federal and state social policy dimensions e.g. federal social inclusion and equity policy and Victorian social justice and equity policies. The linkages between natural and built environment policies and social development policies are made in part but can be “joined up” better. The linkage of environmental and community values in a future governance model is therefore fully supported.

#### **4.1 Draft Comments**

**SunRRA fully supports the sections in the Discussion Paper relating to:**

- Improving connections with our indigenous history – something not done well in Harvester Ward
- The contribution of public land to liveability and community wellbeing and in particular to:
  - Physical health
  - Mental health
  - Social capital
  - Stimulated and sustainable economies
  - Environmentally sustainable urban areas and
  - Artistic expression and cultural diversity
- Opportunities for enhancing the contribution of public land to Melbourne’s liveability

**SunRRA supports the use of five Liveability domains but feels there is one missing domain:**

1. healthy, safe and inclusive communities
2. dynamic resilient local economies
3. sustainable built and natural environments
4. culturally rich and vibrant communities
5. democratic and engaged communities and.....
6. ***equitable, affordable access to publicly owned and managed service systems*** (e.g. transport, education, open space / natural environment, health, housing)

#### ***Open space strategies p101.***

SunRRA supports the Discussion Paper calls for a Melbourne metro-wide open space strategy that also includes an metro-wide Action Plan that also includes targeted investments in key priority areas e.g “high need” Wards / LGA’s . It also feels these plans need to be updated every three years given their importance to the future sustainability of Melbourne and the suburbs and neighbourhoods within it.

It also feels a number of key “Enabling Recommendations” are required to give some teeth to those charged with strategic and operational management of public land in Victoria. The creation of an independent authority to oversee and implement the final recommendations over the coming decade(s) will in SunRRA’s

view be needed to improve Melbourne's future liveability and enhance and protect its public land assets.

***Open space standards p101.***

SunRRA supports the Discussion Paper calls for a set of fair and equitable standards to be introduced. The standards need to incorporate accessibility, sustainability and quality dimensions.

***Open space inventory p102.***

SunRRA supports the use of inventory approaches and sees a three yearly Public Land Audit at Ward and LGA level as an essential element of an effective public land management system.

***Protecting Melbourne's open space network p. 110***

SunRRA supports the proposal put forward in the Discussion Paper. The current dispute between Council and community over the preferred future use of the Sunvale school site is grounded in the absence of any information about Council's method for determining that more residential housing was a priority. Aside from the absence of any cost/ benefit analysis there are no tests of the social, environmental or economic value of the site available publicly.

***Providing new open space p. 111***

As stated many times new open space opportunities are crucial to Sunshine having a sustainable and liveable long term future. Community health and wellbeing is to a large extent dependent on it.

SunRRA believes that under provided communities like Harvester Ward / Sunshine need to be assigned "high needs" priority using access, equity, liveability and sustainability principles as the guide. A "positive open space discrimination" strategy needs to be applied to high needs communities over the medium to long term to bring these areas up to agreed open space benchmark levels.

SunRRA supports a review of open space contributions provisions and would welcome a review of past practices at Brimbank Council and an assessment of their likely long term impacts on community wellbeing, sustainability and liveability so the learnings are never lost.

SunRRA strongly supports the proposal for multiple uses of public land as a means of providing additional access to public open space. In Sunshine it would also be necessary to put in place a parallel and more sustainable longer term approach where opportunities to increase the inventory of quality open space in the area to bring it to benchmark levels were continually assessed and decided on.

***Climate change and public land pp. 114,117,118***

SunRRA supports the comments about vegetated public land and the approaches outlined in sections on

- Parklands and gardens

- Sports grounds and
- Urban water conservation
- Countering heat islands

***Values and future uses of surplus public land p135***

SunRRA feels the proposal to list surplus Crown land and public authority land on the Land Monitor's sales bulletin board should be strengthened to include an automatic email notification to Councils when sites are posted to the board. Similarly if the sites are in "high need" areas then sufficient time is needed for a rapid independent assessment of the social, environmental and economic costs, benefits and future value of the site to the community. The proposed minimum 60 day listing should be doubled.

As stated previously SunRRA supports the transfer of surplus land suitable for another use at no cost to a new manager under assignment or committee of management arrangements.

SunRRA supports a clarification of responsibilities and/or additional resourcing responsibilities for management of Crown land.

## 4.2 VEAC Recommendations and SunRRA's views

**SunRRA members feel the problem of the gaps in access to quality open spaces is most likely to be solved by a strategy that incorporates the following elements:**

- Authorising of a fast tracked "multiple uses" approach to existing *community use* and *services and utilities* land in Harvester Ward
- A transfer of surplus school sites in Harvester Ward back to community ownership at no cost (or minimal cost) for use as quality open spaces
- Strong independent leadership from VEAC and its partner networks that is supportive of Councils and public land owners and focused on improving liveability and health and wellbeing outcomes for communities
- A Public Land framework (strategic and operational) that brings together policy, planning, land control and transfer/exchange, and, auditing / reporting
- A universal whole of Melbourne approach to governance of public land management and priority setting that also includes a targeted approach that identifies "high need" areas e.g. under provided council Wards, under utilised / surplus "service and utilities" land etc.
- A Public Land website that identifies public land ownership and clearly compares useability, accessibility and quality benchmarks at Ward and LGA levels and
- Introduction of a formal fixed term partnership between Parks Victoria and Brimbank City Council (and other similarly needy Councils) that significantly assists the Council build its strategic and operational capacity to develop and manage its open spaces and also develop a *Healthy Parks, Healthy People* culture in both its workforce and the local community.

The high need Harvester Ward community's liveability and outcomes can be significantly enhanced by a clearly targeted intervention that uses the concept of "positive open space discrimination" to bring open space accessibility levels in the Ward up to current Melbourne benchmarks. Quick wins are possible in a number of areas:

### 1. Sunvale School site

- Placing a moratorium on the sale of the school land for further residential housing development
- the Dept of Education and Early Childhood Development putting in place an interim Committee of Management supported by Brimbank Council and including community resident and interest groups
- the transfer of the land at no cost (or minimal cost) to the Sunshine community for development as a community park in line with its vision that also includes the local indigenous community

- establishing a partnership with Parks Victoria to support the Sunshine community and Brimbank Council to implement a sustainable park setting

2. *H. V. McKay Memorial Gardens site*

- excising and transfer of VicTrack land to Brimbank Council for ongoing management

3. *Other school sites in Harvester Ward*

- School land to be made available for multiple community uses
- Partnerships between Parks Victoria, Dept Education and Early Childhood Development, Dept Health, Brimbank Council, and community groups to develop and implement multiple use arrangements to fill access to open space gaps

VEAC's final "Enabling" recommendations need to flag the requirement for government and Councils to sustain and improve Melbourne's liveability as follows:

*Every 3 years make it a requirement for Councils and public land owners to*

- to submit Public Land Audits that clearly benchmark accessibility to and quality of open space experiences at the LGA and Ward levels so a comparative ward, LGA and statewide database of accessibility of public land can be maintained
- identify the current Public Land profiles for Wards and LGA's
- identify all transactions involving public land and the rationale for them

*Every 3 years make it a requirement for the Victorian government to*

- identify the most needy wards and LGA's requiring "positive open space discrimination" in order to bring them up to open space accessibility benchmarks.
- publish Ward and LGA level information in the public domain
- impose moratoriums on the sale of surplus public land in the most needy communities requiring "positive open space discrimination"
- transfer surplus "community use" and "service and utilities" land to Councils / communities identified as requiring "positive open space discrimination" free of charge or at minimal cost
- publish the details associated with the public land transactions finalised across Melbourne's LGA's and Wards

The two sections in the Draft Recommendations of most interest to SunRRA are the recommendations for:

- community use areas and
- services and utilities area

SunRRA feels the drafting of Recommendations by “land use category” only to be a significant weakness needing correction through inclusion of a suite of “Enabling” Recommendations that put in place the supporting infrastructure needed to underpin an effective, well led statewide model of public land governance.

Land use recommendations	VEAC Recommendations-land use category	SunRRA View
	Nature conservation reserves and private protected areas	supported
	regional parks, including metropolitan parks	supported
	natural features reserves	supported
	coastal reserves	supported
	water production areas	supported
	historic and cultural features reserves	supported
	community use areas	<p><b>DRAFT RECOMMENDATION</b>  <b>I</b> That community use areas as shown on map A, according to their specific characteristics, be used for recreation, parklands and gardens, reservoir parks, buildings for community purposes and education; and</p> <p>(a) appropriate facilities be provided            (b) schools, public halls, kindergartens, libraries, museums and other similar areas be used for education, recreation where appropriate, and public enjoyment            (c) parklands and gardens be used as botanic and other gardens, community parkland or ornamental plantations            (d) where relevant, and where compatible with the above, features of cultural significance, natural surroundings and the local character and quality of the landscape be maintained or restored  <u>(e) where relevant, ownership of surplus community use land be transferred to “high need” Council ownership free of charge to improve equity and access to open space opportunities</u>  <u>(f) where safe and relevant, community use of existing land be maximised in “high need”</u></p>

		<p><a href="#"><u>Council areas to improve equity and access to open space opportunities</u></a></p> <p>(g) harvesting of forest products, hunting, and 'stone' extraction as defined in the <i>Extractive Industries Development Act 1995</i>, not be permitted; and</p> <p>(h) Crown land, not already appropriately reserved, be reserved under the <i>Crown Land (Reserves) Act 1978</i>; or</p> <p>(i) public authority land be managed in accordance with the above.</p> <p><b>Note:</b> Where appropriate, a committee of management may be appointed or continue to manage community use areas in accordance with the general recommendation I.</p>
	services and utilities areas.	<p><b>DRAFT RECOMMENDATION</b></p> <p><b>J</b> That reserves and easements for public services and utilities such as transport, electricity and gas, communications, cemeteries, water and sewerage be used for those purposes; and that</p> <p>(a) new services, or utility sites and easements or lines, not be sited in or across reference areas, and wherever possible not be sited in or across national, state or other parks or nature conservation reserves</p> <p>(b) railway lines, roadsides and other service and utility sites be managed to protect natural values including remnant vegetation and habitat, as far as practical</p> <p><a href="#"><u>© where safe and relevant, community use of existing land be maximised in "high need" Council areas to improve equity and access to open space opportunities</u></a></p> <p>(d) organisations responsible for services and utilities management conserve and protect indigenous flora and fauna communities and habitat, as part of management plans/ planning;</p> <p>(e) should a public land area or building and site used for service or utility purposes no longer be required for its primary designated use, it be assessed for its natural, recreational and cultural heritage values, and capability for other public uses <a href="#"><u>and</u></a></p> <p><a href="#"><u>(f) where relevant, ownership of surplus service and utility land be transferred to "high need" Council ownership free of charge to improve equity and access to open space opportunities</u></a></p> <p><b>Notes:</b></p> <p><b>1.</b> While DSE, VicRoads and municipalities are commonly responsible for road reserve management, many unused roads are licensed to adjoining landholders. Roads and unused road reserves may not be distinguishable on map A.</p> <p><b>2.</b> There are numerous cemeteries across the investigation area that contain remnant natural vegetation. These should be managed to protect this vegetation where it does not interfere with the primary objective of the cemetery.</p>

<b>Enabling recommendations</b>	Melbourne's Public Land Management and Control Legislation	Purpose, clear measurable objectives (liveability, wellbeing, sustainability), standards, benchmarks, powers of independent authority, public land inventory, public land audits, land exchange, disposal of land , multiple uses of land, positive discrimination policy for priority high need areas, etc.
	Policy and planning	Policy drivers, strategic and operational plans, universal Melbourne wide approaches, targeted interventions for priority areas
	Information and land management	Systems and tools
	Independent authority	Governance, budget and resources
	Partnership arrangements	Partnerships between Parks Victoria, Councils and "high need" communities
	Communications	Communications strategy and social media tools