30 November 2017

Smart Planning Program
Department of Environment, Land, Water & Planning
8 Nicholson Street
MELBOURNE VIC 3000

To Whom it May Concern

Parks and Leisure Australia (PLA) welcomes the opportunity to comment on the Reforming the Victoria Planning Provisions discussion paper.

PLA is a national member-based association for professionals working in the parks, sporting, recreation and leisure sectors. A significant portion of our membership are local government staff working in sport, recreation and open space planning, and as such have a significant interest in the protection, expansion and development of open space as places to recreate, play, be physically active, and to rest.

PLA supports the reforms in principle and recommends that given the importance of open space and recreational infrastructure to liveability and health & wellbeing, that the parks and leisure the industry be invited to be involved in future discussions about the refinements being proposed. Some of the refinements needed to the current Victorian Planning Provisions for which PLA could contribute to are:

1. Better industry-appropriate definitions (including a definition for public open space - which there is none in the Victorian Planning provisions).
2. Requirements around what is acceptable regarding open space plans required as an input into planning, etc.
3. Better guidance around taking land for open space and recreation facilities in a subdivision - rather than relying on Section 173 agreements, for example, and what guidelines apply to established brownfield developments, ie. especially in non-growth areas.
4. Retaining some important provisions related to functions of open space required in communities, in different densities and mixed use areas; the size of parks, walkable distances, etc. and use of encumbered land for open space.
5. Any document that should be incorporated into the Scheme. (*Linking People and Spaces* should probably be retained as there is no other statewide open space related document incorporated that is relevant to non-growth areas, even though this is a 2002 report).

6. Better guidance about public open space in higher density developments – in particular interfaces between buildings and public space, and buildings of different heights, solar access, deep soil, and road and off road trail access to parks, etc.

The parks and leisure industry would like to be actively involved in the establishment of new planning definitions related to public open space and recreation facilities, and the drafting of any revised provisions.

Given the significance of open space and recreation provision to liveability, health, and wellbeing, etc., acknowledged by the government, this review should extend to looking at how planning disputes related to open space and recreation provision are resolved. For example, Panels Victoria should employ at least one panel member with open space and recreation industry expertise to preside over open space-related issues.

Parks and Leisure Australia recommends qualified parks, leisure and recreation industry personnel be involved in major infrastructure projects that involve open space planning or provision, such as exemplified by the level crossing removal project and the Mernda Railway extension, that are in danger of having poor long-term outcomes for the community due to lack of input into the planning process by qualified professionals and advocates from the parks and leisure industry.

I look forward to hearing back, and to discussing ways in which PLA can become an active participant and contributor to planning reform.

Yours sincerely