VicSport
Victoria's Peak for Sport & Active Recreation

Government Submission

Response to Clause 56 Proposed Changes To Residential Subdivision and Impact On Public Open Spaces

November 2005

VicSport
Level 3 Sports House
375 Albert Road
South Melbourne Vic 3205
P: 03 9926 1376 F: 03 9696 7931 E: admin@vicsport.asn.au

VicSport ©

VicSport
Victoria's Peak for Sport & Active Recreation

Mr Craig Wilson
Built Environment Group
Department of Sustainability and Environment
PO Box 500
EAST MELBOURNE VIC 3002

17th November 2005

Dear Craig,

Please accept this submission regarding Sustainable Neighbourhoods Proposed Clause 56.

VicSport is the Peak for Sport in Victoria. As an independent member based body VicSport represents the concerns of over 170 sport and recreation organisations. VicSport's membership includes State Sports Associations, Regional Sports Assemblies, University Sports Organisations and the associated membership bases of these organisations.

As the Peak for Sport and Recreation in Victoria VicSport presents this submission raising issues of concern specific to the proposed Clause 56, along with broader use of land and public open space issues, on behalf of all members of the sport and recreation community.

On behalf of our industry I thank you for taking the time to consider the issues raised in this submission. Should you have any queries or wish to discuss any issues further please do not hesitate to contact me.

Yours sincerely

Kate Roffey

Kate Roffey
CEO
VicSport - The Sports Federation of Victoria

VicSport
Victoria's Peak for Sport & Active Recreation

VicSport
Victoria's Peak for Sport & Active Recreation

Department of Sustainability and Environment

Sustainable Neighbourhoods:

Proposed Clause 56 – Residential Subdivision

VicSport Response to the Consultation Draft – November 2005

The Proposed Clause 56 – Residential Subdivision Consultation Draft released in September of this year not only offers the opportunity to raise issues of concern with the proposed changes to Clause 56, but also to once again raise significant infrastructure concerns regarding the provision of community accessible sport and recreation grounds and facilities in Victoria in general.

Concerns regarding the provision of sport and recreation grounds and facilities at all levels is an issue that has been raised on a number of occasions by a range of sport and recreation groups, including VicSport, with Victorian Government Departments and State Ministers.

The benefits of physical activity, not just to the individual in regards to better returns on physical and mental health, but also to the community in terms of community growth and lower costs to the health system, are well documented. Our State Government continues to emphasise the importance of physical activity opportunities as a benefit for better physical and mental health and for community development. In fact, in a recent press release, our Minister for Sport and Recreation stated, "Our grassroots sports clubs are at the frontline in our fight against childhood obesity as well as helping build stronger, healthier communities."

There is no doubt physical activity plays a major role in delivering improved health outcomes at all levels. Unfortunately, the promotion of sport and recreation infrastructure development required to deliver the increased participation opportunities for all is not afforded the priority focus it requires. Better health depends on generating greater active participation rates, and an increased active participation rate is reliant on providing more participation opportunities. Ultimately the bottom line is we need more sport and recreation grounds and facilities to really get Victorians more active.

Access to sporting and recreation facilities is a key factor in providing physical activity opportunities for the community. Sport and recreation facilities, be they community swimming pools, football fields, netball courts, hockey pitches, cycle paths, bush walking tracks, or other Public Open Spaces (POS) that can be utilised as areas where structured or unstructured physical activities can safely be conducted, play a key role in creating happier and healthier community environments.

As the major providers of sport and recreation grounds and facilities and other essential infrastructure support, State and Local Government agencies have a key role to play in promoting physical activity in Victoria.

Use of land and access to resources will continue to be the defining factor determining participation rates both now and into the future. As a key area, priority consideration must be given to future land use. Easy access to safe and well-serviced sport and recreation facilities encourages a sense of community and promotes involvement at all levels.

Unfortunately, the reality is there is already a decided lack of quality sport and recreation infrastructure available for participation at all levels, and the overly broad and generic guidelines outlined under the Proposed Clause 56 will only serve to add to what is already a genuine threat to the future growth of sport and recreation in Victoria.

Our POS system must not only serve conservational and urban landscaping roles, it must also serve broader recreation and sporting needs, including organised sport, as well as informal activity or simply relaxation.

The genuine lack of accessible facilities across the State means not only are Victorians missing out on essential physical activity opportunities, but the high use demands currently being placed on existing facilities is taking its toll. As existing facilities age we are also seeing increased risk management requirements being forced onto sport and recreation groups and councils as they struggle to keep aging facilities safe for use.

Without careful consideration of and planning for facility development in the near future, we not only inhibit participation growth rates, we also place those facilities we currently have under threat of non-sustainability through overuse.

While the concerns of our industry relate to much broader infrastructure concerns than those solely affected by the Proposed Clause 56, there are some major concerns, which must be addressed if these proposed changes are not to create even greater difficulty in accessing participation opportunities.

Following is an outline of some of the concerns raised by our industry. It is important to note the concerns raised below are not an exhaustive list of issues. Specific members of our sector may identify other concerns not expressed in this response. This in no way signifies these concerns are of lesser importance to our industry.

Proposed Clause 56 Issues of Concern:

Urban Landscaping Focus

The change of title for section 56.05 from *Public Open Space* to *Urban Landscape* is an immediate issue of concern as it indicates the primary focus has shifted to Urban Landscaping, and the provision of POS is now a secondary concern. As clearly identified above, the value of open space as a contributor to sport and recreation participation opportunities cannot be underestimated, nor can the need to provide equitable access to a diverse range of POS opportunities for every community.

Already the sport and recreation sector is being severely impacted by limited access to sport and recreation POS and purpose built facilities. Any indication from Government that the need to provide adequate open space and recreational facilities to meet community requirements has been relaxed will have significant negative results at the grass roots level.

Lack of clearly defined Public Open Space requirements

The lack of clear definitions detailing POS requirements sets a dangerous precedent for the sport and recreation industry as it mitigates the need for developments to focus on the wants and needs of the community, and creates opportunities to “bend the rules” a little.

As an example, under the overly broad guidelines contained within the Draft Consultation paper, areas such as extended median strips, encumbered water drainage areas and commuter cycleways can be included as POS requirements, even though they in no way meet a reasonable consideration of open space provided for sporting or recreational purposes.

We are already seeing evidence of the negative impact poorly defined POS guidelines are having as new neighbourhoods are being developed. While guidelines may require future built environments to set aside a defined percentage of the total land as recreational space, the lack of definitions guiding the form this space should take have seen number of new housing estates being developed with a large lake being created to meet POS requirements.

While a lake may look pleasant, and require less ongoing upkeep than the 3 grass pitches and multi-purpose indoor stadium that could have taken its place, the reality is for the benefit of the community, these multi-purpose recreational facilities would in all likelihood have provided more community access opportunities.

Of course the idea is not to preclude the consideration of water spaces as important recreational areas, however to meet total POS requirements through the creation of large water spaces rather than a variety of facilities goes against the ethos of providing opportunities to meet the diverse needs of the community.

When considering water spaces as recreational facilities it is vital encumbered land such as water drainage and potable water areas whose primary purpose is not recreational in nature, is not counted as part of POS used for sport or recreational purposes. In such cases, if a proportion of any such encumbered waterway is dedicated to recreational purposes and has appropriate infrastructure to support such activities, it is feasible that portion, and that portion only, can be counted toward POS provision requirements.

Lack of sport and recreation specific guidelines

While the importance of sport and recreation to many sectors, including health, tourism, community development etc, is recognised by the current Government at many levels, under the proposed planning provisions sport and recreation is notable only by its absence.

The Consultation Draft indicates the provision of public space should:

> *Meet the social, cultural, recreational and sporting needs of the community.*
>
> *Promote an active and healthy lifestyle by providing areas for passive and active recreation, the exercising of pets and shaded areas where people can congregate for social and community purposes.*

Unfortunately, while the ethos exists, the specific POS definitions make no provision specifying any sporting or recreational requirements, either in terms of size or type of space, must be met. Already the sport and recreation sector is struggling to simply maintain current participation levels as demands for access to our limited grounds and facilities continues to grow.

Without clearly defined strategies in place for the growth and development of sport and recreation infrastructure now, and in the future, our industry will not be in a position to offer the increased range of physical activity opportunities required to get Victorians more active.

Walking and Cycling Networks

While quite extensive provisions have been made in this Draft to establish more extensive walking and cycling networks, the sole focus is on developing these networks as alternative transport networks. That no similar consideration has been given to the need to provide safe and functional walking and cycling paths to be enjoyed by other members of the community for purely recreational purposes is a concern to our industry.

While the sport and recreation sector fully supports the provision of more safe and extensive walking and cycling networks for transport purposes, it is important to recognise commuter networks often do not serve as appropriate recreational

networks. This is of particular importance in the case of roadside cycle ways and footpaths, which for many users, such as children, families or the elderly for example, are not appropriate recreation options.

Due consideration must be given to the development of cycling and walking networks for recreational purposes. The proposed Clause 56 provisions must clearly indicate those networks developed primarily as commuter access networks should be recognised as such. Those networks which cannot be reasonably considered as primarily recreational in nature, such as roadside cycle paths or footpaths, must not be included as POS used for recreational purposes.

Co-Location Requirements

Standard C13 states "Provision for POS should be located abutting school sites." While the importance of including POS abutting schools is acknowledged, it is equally important to ensure this requirement does not act to limit the development of sport and recreation facilities or impinge on community access to facilities.

While co-location requirements provide benefits for some important community members, in particular schools, they can also act to the detriment of other community groups. As an example of the difficulties that arise with co-located facilities, in the new Caroline Springs development area, large POS were set aside for sport and recreational purposes in a co-located school area.

By creating a large open space area near to school land, the developers met current POS requirements without having to consider providing other community sport and recreation facilities in the area. While this did provide easy access to facilities for schools in the local area, the high usage rate by schools meant the facilities were rarely available for access by other community groups.

The combination of the general lack of facilities in the area, and the high usage rate by schools has had a significant negative impact on the ability of sport and recreation groups to offer community participation opportunities. While we acknowledge there is a need to have adequate POS within easy access of schools, there is an equally important need to service the needs of other community groups. Provisions must be put in place to ensure POS areas primarily used for school purposes are recognised as such and are not considered primarily as community accessible areas.

Other Issues for Consideration

While the concerns outlined above relate to specific sub-sections of Clause 56, there are a number of other issues relating to the provision of POS for the development of sport and recreation grounds and facilities which must be considered. These issues include but are not limited to:

Structured Sport and Recreation

Specific consideration must be given to the inclusion of space for structured sport and recreational purposes in open space planning provisions. Sport and recreation facilities and grounds are essential elements of community infrastructure and adequate space must be set aside for their development. POS requirements must ensure allocated space cannot merely be made up of walking tracks or cycle paths, waterways, conservation parks or the like.

Local, District and Regional Open Space

Requirements for a balance between local, district and regional open space must be set. Overall in Victoria, very few regional parks are available for public use as the primary focus is on conservation, and of those that are, few have areas set aside where structured sport or recreation activities can take place. Counting large National Parks or inaccessible Crown land as POS available for community use is inappropriate.

The Government must have requirements in place to ensure local, district and regional open spaces serve the needs of the relevant population. In particular, longer term strategic planning must be taken into account to ensure open spaces will serve the needs of those living in the neighbourhood, district and region both now and into the future.

Community Built Facilities

In additional to POS land being set aside for sport and recreation purposes, consideration must be made to set aside land for community built facility purposes. Outdoor fields, walking tracks, cycle ways and the like are only one element of sport and recreation infrastructure. Built facilities such as community swimming pools, indoor multi-purpose venues, skate parks and tennis courts for example, are vital community assets and provision for open space to be set aside for the development of such facilities needs to be made in additional to general POS requirements.

Protection of existing POS and facilities

Existing POS and purpose built facilities are essential community resources. These existing facilities must form the basis for future growth at the local, district and regional level. It is important to protect our existing facilities, particularly community and regional facilities and not just those world-class facilities that attract large-scale events to our state, and to plan for their ongoing growth and development.

In light of the already over stretched demands on sport and recreation grounds and facilities our industry faces, we must ensure the overall provision of facilities increases across the board. In the best interests of every Victorian we cannot afford to lose any more of our existing facilities to housing developments or roadways. The provision of land for sport and recreation facilities needs to increase. Simply knocking down an existing facility to create POS necessary to meet planning requirements, or exchanging football fields for a waterway is not an acceptable solution to our problem.

Planning for the Future

When looking at provisions for open space and facility development the key must be to look not at what we need now, but what will we need in the future. The last Open Space plan of Melbourne was completed in 1954 and despite the huge growth of this city over the past 50 years, we are still trying to exist in a 1950's capacity. Sport in particular has struggled to meet the demands of an increasing population who is being encouraged to get more active, unfortunately without the facilities required to meet increased demands.

While the need for more sport and recreation opportunities and community facilities is clearly acknowledged, the question is in a city like Melbourne, where do you find the land? As has been clearly seen in England, it is a very difficult and very costly exercise to try and reclaim POS once it has been developed. Adequate space for our future needs must be set aside now.

Involving the community

Open space belongs to the community. Government at all levels must be encouraged to allow key representative groups such as VicSport and the broader sport and recreation community to take an active role in decision making for the future. Community consultation is a vital element in ensuring both the current and future wants and needs of the community will be met.

On many occasions we have seen examples of developments, even those developed with the best intentions, failing to realise their full potential because expert advice was not sought from those groups working at the frontline of sport and recreation. By simply involving a group like VicSport during the open space planning phase to provide guidance on issues such as land quality and spatial requirements of different sport and recreational pursuits, site design and layout etc, Government can ensure the best options for the community are achieved.

Diversity and Equity

Urban open space should be used to accommodate the needs and aspirations of people of all abilities, cultures and ages. We must ensure no resident either now or in the future will lack access to sport or recreation opportunities through lack of access to POS or purpose built facilities.