



Hobsons Bay
CITY COUNCIL

Hobsons Bay City Council Submission on the Draft Planning Policy Framework

MAY 2014

Introduction

In October 2013, the Minister for Planning expanded the terms of the State Planning Policy Framework Review Advisory Committee to review ways in which Local Planning Policy Frameworks (LPPF) could be better aligned with the State Planning Policy Framework (SPPF). As a result, the Advisory Committee has prepared a document called the draft Planning Policy Framework (PPF).

Local Context

Hobsons Bay is situated 10 kilometres west of central Melbourne. It covers an area of approximately 66 square kilometres. Hobsons Bay has over 20 kilometres of bay frontage, quality residential areas, a large expanse of environmentally significant open space and a range of major industrial complexes, which contribute significantly to the economy of Victoria.

The municipality faces some significant planning challenges including:

- Accommodating residential growth for future generations to facilitate urban consolidation;
- Increasing residential development pressure on heritage areas and coastal areas;
- Provision of affordable, environmentally sustainable housing;
- Protection of environmentally significant areas for future generations;
- Operation of the municipality's national and state significant industries;
- Expansion of the Port of Melbourne;
- Increasing freight and traffic movement associated with the expansion of the Port of Melbourne and residential growth to the west of Melbourne;
- Protecting the local economy to ensure long term economic development and employment opportunities;
- Supporting healthy and sustainable activity centres;
- Managing the impacts associated with increasing tourism; and
- Managing potentially contaminated land and landfill gas issues.

Hobsons Bay City Council appreciates the opportunity to submit its views to the Committee on how the state, regional and local policy frameworks can be integrated to contribute to the improvement of the planning system.

This submission is structured to respond to the key questions posed by the Advisory Committee.

Are there errors or omissions in the draft PPF?

01.03-S-02 Application of Regional Policy

The application of regional policy to Hobsons Bay does not appear to be relevant to the municipality. It is understood that 'Regional' policy has been applied to Hobsons Bay because it contains land located in the 'Green Wedge'.

The Integrated Policy Framework outlined in Figure 1 at Section 01.03-S-01, indicates that 'Regional Victoria' *applies to all planning schemes with land outside Melbourne's metropolitan boundary.*

Table 1 at Section 01.03-S-02 Application of Regional Policy indicates that Regional Policy applies to Hobsons Bay. The municipality has no land outside the metropolitan boundary, nor is it a fringe municipality being separated from regional Victoria by Wyndham. It is not included in any Regional Growth Plan.

The proposed PPF provisions covering Melbourne's Green Wedge Areas are relevant to Hobsons Bay and appear to provide adequate control for land in the municipality, located between the metropolitan urban boundary and the metropolitan regional boundary.

While it seems appropriate to remove Hobsons Bay from the 'Regional' provisions of the PPF, this should only be considered if there is no other change to the application of policy to Hobsons Bay as proposed in Table 1 at Section 01.03-S-02.

Additionally, the Council seeks assurance that it would not prejudice any funding arrangements if 'Regional' policy was not applicable to the municipality.

Recommendation 1: That Hobsons Bay is reconsidered for the list of municipalities affected by Regional Victoria policy at Table 1 in Section 01.03-S-02.

02.01-S-03 Environmental Context

The section provides a policy context for state policy and includes a section on 'A changing climate' which indicates *Our climate is constantly changing, due to a wide range of human and natural factors. Over its history, Victoria has seen frequent bushfires, heatwaves, flooding and storms and these are projected to increase in intensity and frequency. Planning needs to take account of these changes.* It is recognised that planning does need to respond to climatic conditions. Foreshore flooding associated with sea level rise is a particular concern for Hobsons Bay. The PPF needs to be supported by detailed policy guidance or Victorian Planning Provision (VPP) tools to ensure that state policy can be delivered spatially. Without the necessary tools, the PPF raises the expectation of stakeholders that the planning schemes are able to deliver outcomes beyond their legislative framework. Hence, state policy needs to be well developed and defined.

Additionally, a state policy context for Environmentally Sustainable Design and Integrated Water Management should be included. Environmentally Sustainable Design is included at Section 6.04 however, as in the draft *Plan Melbourne*, it is only generally addressed at a high level through recognition that urban consolidation will deliver a more integrated and sustainable city. Specific sustainable design initiatives are not included, rather they are generally dealt with under housing 'affordability', to improve the quality and amenity of residential apartments. (Refer *Plan Melbourne* Initiative 2.1.4). Hobsons Bay encourages any future review of the PPF to consider the specific inclusion of environmentally sustainable design policy. This could dovetail, with affordability initiatives as sustainable design principles will result in the long term reduction of operating expenses for the future occupant of dwellings. This is further supported by the recent Environmentally Efficient Design Local Policies Advisory Committee and Panel Report (7th April 2014) which recommended a state-wide approach to sustainability in planning as it would be the most effective way to achieve the greatest sustainability outcomes.

Direction 5.5 of *Plan Melbourne* is to *Integrate whole of water cycle management to deliver sustainable and resilient urban development*. This has been reflected in the draft PPF at Section 13.02 which addresses 'Whole of Water Cycle Management'. This policy too, should have a state context provided in section 02.01-S-03 of the draft PPF.

Recommendation 2: That high level policy direction be well developed and/ or supported by planning tools in the VPP to ensure that policy can be effectively translated into planning outcomes at the local level.

Recommendation 3: That state policy on 'Environmentally Sustainable Design' and 'Integrated Water Management' be recognised in the Environmental Context Section at 02.01-S-03 of the PPF.

Recommendation 4: That any future review of the PPF specifically address the inclusion of Environmentally Sustainable Design policy.

03.06-M00-02 Metropolitan Melbourne Framework

The Metropolitan Melbourne Framework map shown here is incorrect. Land zoned Industrial 3 on the eastern side of Maddox Road in Williamstown North should not be included as part of the Western State Significant Industrial Precinct. Although currently zoned Industrial 3, this land is identified in the Hobsons Bay Industrial Land Management Strategy (ILMS) as being surplus to industrial requirements and potentially suitable for a residential outcome. The Minister for Planning approved Amendment C33 to the Hobsons Bay Planning Scheme on 23rd December 2008 which introduced the ILMS to the planning scheme. This has been relayed to the Department of Transport Planning and Local Infrastructure (DTPLI) in Hobsons Bay's response to the draft Plan Melbourne document released in October 2013.

Additionally, it is suggested that the map size be increased to ensure it is legible.

Recommendation 5: That the Metropolitan Melbourne Framework map at Section 03.06-M00-02 be corrected by removing the Industrial 3 land on the eastern side of Maddox Road in Williamstown North from the Western State Significant Industrial Precinct.

Recommendation 6: The Metropolitan Melbourne Framework map at Section 03.06-M00-02 size be increased to ensure it is legible. The legend should be contained on the same page as the map. (This is discussed later in this submission).

03.10-S-01 20 Minute Neighbourhoods

Hobsons Bay is aware that the State Government has released Victoria's Cycling Strategy *Cycling into the Future 2013-23* in 2012 and queries whether this should be included in the 'Guidelines for Decisions Makers' in the PPF.

Recommendation 7: That consideration be given to including Victoria's Cycling Strategy *Cycling into the Future 2013-23* as a guideline for decision makers at section 03.10-S-01.

05.05-S-02 Contaminated and Potentially Contaminated Land

There have been several recent reviews of the way contaminated land is managed in Victoria. This has resulted in the need for responsible authorities to consider their roles and responsibilities when making land use planning decisions. The Environment Protection Agency's (EPA) *Best Practice Environmental Management Guidelines for the Siting, Design, Operation and Rehabilitation of Landfills* (2010) identifies landfill gas as an issue for closed landfills. It requires landfill gas implications to be considered for any planning permit application, or planning scheme amendment on land that is within 200 metres or 500 metres of disused landfills (depending on the type of landfill).

These guidelines are mentioned under Clause 13.04-S-01 (waste and resource recovery) and provide direction for the closure of current landfills however issues relate to historical landfill sites that sit within the municipality and the effect they have on future development.

Hobsons Bay, as with many other Councils (particularly in the west) has a number of closed landfill sites that have the potential to impact future development in certain areas. This is posing a serious issue for the Council as failure to adequately respond to the EPA recommendations outlined in the guidelines, would involve a high level of risk and potential legal liability. A planning framework should be put in place to assist Councils in identifying these risks and plan for them in the future.

Recommendation 8: That Clause 05.05-S-02 include objectives and guidelines that provide a direction for managing landfill gas issues and the *Best Practice Environmental Management Guidelines for the Siting, Design, Operation and Rehabilitation of Landfills* (2010) be included as a background document.

05.08-S-01 Hazardous Facilities

Hobsons Bay supports the introduction of new state policy on hazardous facilities.

The Council would like to see greater rigour at state level to provide definitive policy guidance to Council's and recommends that this matter be addressed when state policy is next updated.

Recommendation 9: That any future review of the PPF specifically address supporting policy or planning tools in the VPP, such as 'reverse buffers' to provide definitive guidance to Council's when planning around Major Hazard Facilities.

08.03-S-01 Design of Housing

The 'Guidelines for Decision Makers' require consideration be given to *Design Guidelines for Higher Density Residential Development (Department of Sustainability and Environment, 2004)* in assessing the design and built form of residential development of four or more storeys. VC Amendment 104 amended the VPP's and planning schemes to make reference to development of five or more storeys, as opposed to four or more storeys. This appears to be an error and this Clause should refer to*five or more storeys*.

Recommendation 10: That Guideline 1 at 'Guidelines for Decision Makers' in Section 08.01-S-01 be corrected to give consideration to residential development of four or more storeys.

10.03-S-01 Education Facilities

The wording of Strategy 1.1 is confusing. There appears to be a punctuation error, with an incorrect placement of a comma. To provide clarity, it is suggested that the strategy be reworded from *Provide education facilities, to address demographic trends, the existing and future demand requirements and the integration of facilities into communities, to Provide education facilities to address:*

- *demographic trends;*
- *the existing and future demand requirements; and*
- *the integration of facilities into communities.*

Recommendation 11: That Strategy 1.1 at Section 10.03-S-01 be reworded to 'Provide education facilities to address:

- demographic trends;
- the existing and future demand requirements; and
- the integration of facilities into communities'.

10.06-S-01 Cultural Facilities

Provisions relating to licensed premises and the role of the Victorian Commission for Gambling and Liquor Regulation (VCGLR) do not 'sit comfortably' in a section titled 'Cultural Facilities.' licensed premises may be better located at Section 10.07 and included with 'Gaming and Brothels'.

Recommendation 12: That consideration be given to removing licensed premises from 'Cultural Facilities' and included at section 10.07 with 'Gaming and Brothels'.

12.04-S-01 Public Transport Networks

Objective 1 seeks *To maximise development opportunities in areas that can be well served by public transport.* It is suggested that this objective be reworded to 'To maximise development opportunities in *appropriate* areas that can be well served by public transport'. Not all areas served by public transport should be maximised for development. In Hobsons Bay for example, transport must be balanced with local heritage considerations. The role of the planner is to balance competing priorities for net community benefit. This should be recognised in the wording of objectives in the PPF.

Recommendation 13: That objective 1 in section 12.04-S-01 be reworded to 'To maximise development opportunities in *appropriate* areas that can be well served by public transport'.

What change is needed to accommodate local policy in the proposed structure?

03.09-M00-01 Urban Renewal

Strategy 1.2 at Objective 1 indicates *Plan the development sequence of major urban renewal precincts around Melbourne to optimise the use of existing and planned infrastructure.* It is

suggested that this wording be altered to consider local planning policy in the proposed structure. For example, in Hobsons Bay, a strategy at Clause 21.03-2 Objective 1 requires *the preparation of an Outline Development Plan (i.e. a master plan), for Strategic Redevelopment Areas that are no longer suitable for traditional industrial uses and are in multiple ownership in consultation with land owners, adjoining land owners, key government stakeholders and the Council to ensure that the Strategic Redevelopment Area as a whole can integrate with its surrounds and address significant interface issues.* The state's priorities may not align with a Council's priorities, ability or timeframe to complete the work to ensure a good planning outcome. A partnership approach is required to achieve a good planning outcome.

Recommendation 14: That Strategy 1.2 at Objective 1 at Section 03.09-M00-01 be reworded to promote a partnership approach between state and local governments when planning the development sequence of major urban renewal precincts around Melbourne.

Section 08.01-M -00 Location of Residential Development

Strategy 1.3 at Objective 1 indicates *Facilitate greater diversity of housing within significant change areas including family-friendly housing, affordable and social housing, and housing for key workers.* It is essential that the planning scheme be streamlined by ensuring 'follow through' via the inclusion of implementation strategies that can effectively translate PPF objectives and strategies into land use outcomes in the relevant zone, overlay or particular provisions section of the scheme. Presently, the proposed state direction to facilitate affordable and social housing, and housing for key workers is not supported by an appropriate range of tools in the VPP's, such as inclusionary zoning or a nominated percentage figure in housing developments of a certain size/ number of dwellings to ensure that high level direction can be successfully integrated into the planning system at the local level.

Recommendation 15: That high level policy direction provided at Section 08.01-M-00 be supported by the introduction of an appropriate suite of planning tools in the VPP such as, inclusionary zoning or a nominated percentage figure in housing developments of a certain size/ number of dwellings to ensure that policy can be effectively translated into planning outcomes at the local level.

08.02-S-01 Housing Diversity and Affordability

Objective 2 seeks *To improve housing affordability in areas close to jobs, transport and services.* As discussed in relation to section 08.01-M-00 above, a primary concern is the lack of policy 'follow through' to provide clear direction into the zone, overlay and particular provisions. Without clear policy direction, the SPPF raises the expectation of stakeholders, particularly residents, Council staff and Councillors that planning schemes are able to deliver outcomes beyond land use planning and development outcomes and beyond the purpose of its legislative framework, such as the day to day ongoing management of affordable housing developments through permit conditions.

Objective 4 Strategy 4.3 states: *Recognise that the provision of social housing is facilitated through a range of funding, delivery and partnership models with external housing providers.* However the current policy framework does not include enough specific requirements for affordable housing particularly in the private market. There are limited tools for Councils and other stakeholders to use

in the implementation of affordable housing. As a result, Councils have no legislative or regulatory back-up to do more than encourage or advocate for increased affordability. Strengthening the provisions is therefore essential to enable local government to work with developers to deliver affordable housing outcomes.

Objective 4 Strategy 4.5 which seeks to *Facilitate the renewal of existing social housing sites through planning and development* adds little value to the decision making process . It is implicit that the application of planning and development controls will be required to facilitate the renewal of existing social housing sites. The emphasis of the strategy appears to be on the availability of VPP tools to facilitate the renewal of existing social housing sites (such as a DPO which removes third party appeal rights), as opposed to the facilitation of the renewal of existing social housing estates, which should be the primary objective. This should be undertaken through a transparent planning process. As indicated above, there are limited tools for Councils and other stakeholders to use in the implementation of affordable housing. Consideration of the inclusion of tools in the VPP to facilitate the delivery of affordable housing is strongly encouraged.

Recommendation 16: That in any future review of the PPF consideration be given to include strategies at Objective 2 at Section 08.02-S-01 such as a inclusionary zoning or nominated percentage of affordable dwellings in developments of a certain size/ number of dwellings which can 'translate' policy into a land use planning outcome that can be achieved at the local level.

Recommendation 17: That in any future review of the PPF give consideration to introducing tools into the VPP to support and facilitate the delivery of Strategy 4.3 at Section 08.02-S-01 to *Recognise that the provision of social housing is facilitated through a range of funding, delivery and partnership models with external housing providers.*

What further changes could improve navigation?

Maps

It is suggested that all maps be produced in 'grey-scale' in order to make the PPF easier to photocopy and distribute to people with limited knowledge or ability of computers. Colour maps do not reproduce well in black and white and in Hobsons Bay there is a significant portion of the community who seek hard copies of documents.

For those who do access the planning scheme on-line, it is useful to have any map legend contained on the same page as the map, to improve readability. One of the major inconveniences of *Plan Melbourne* was the provision of a legend on the page following the map requiring readers to switch between pages to interpret the map.

Care should be taken to ensure that the print size of text contained in each map is of a legible size.

Recommendation 18: That maps contained in the PPF be produced in 'grey scale'; contain a legend on the same page as the map; and are produced in a size that any text contained on the map is legible.

Layout

Presently, the text in the draft document tends to run together. It is suggested that greater separation between the policy elements be provided to ensure that policy considerations are not inadvertently overlooked.

Recommendation 19: That greater separation be provided between the policy elements of each Clause to ensure that relevant policy considerations are not inadvertently overlooked.

Structure

The concept of consolidating relevant policy settings for each municipality is supported. In Hobsons Bay there are a number of 'local' incorporated documents that impact on the policy settings. It is unclear whether these documents will be identified in the structure of the local policy setting.

Recommendation 20: Consideration be given to whether 'local' incorporated documents should be identified within the PPF structure to provide a consolidated policy setting for a municipality.

Documents located outside the planning scheme

A link to all Background Documents cited in 'Guidelines for Decision Makers', 'Background Documents' and 'Strategic Planning Guidelines' should be provided and maintained by DTPLI on their Planning Schemes Website to ensure that all relevant policy documents are readily available to users of a planning scheme.

Recommendation 21: That a link to all background documents cited in 'Guidelines for Decision Makers', 'Background Documents' and 'Strategic Planning Guidelines' be provided and maintained by DTPLI to ensure that all relevant policy documents are readily available to users of a planning scheme.

Are there other specific regions or thematic areas (such as coastal areas) that should be identified for separate policy?

It appears that the proposed PPF has included all specific regions and thematic areas within its policy framework.

What maps would you want to include and can you see a logical place for them?

01.03-S-02 Application of Regional Policy.

It is suggested that a map of the areas affected by 'Ministerial Direction 14 Ports Environs' surrounding the Ports of Melbourne, Hastings, Geelong and Portland be included at Section 01.03-S-02 Application of Regional Policy. Although there is a 'Port Environs Area' region, Ministerial Direction 14 includes maps which only partially affect the listed municipalities. Port Environs Areas are not currently mapped in the PPF meaning that readers have to refer to a document that sits outside the planning scheme. Clearly delineating land affected by Ministerial Direction 14 will

facilitate useability and understanding of the PPF, particularly for those who are not familiar with the Victorian planning system.

Recommendation 22: That a map of the areas affected by 'Ministerial Direction 14 Ports Environs' surrounding the Ports of Melbourne, Hastings, Geelong and Portland be included at Section 01.03-S-02 Application of Regional Policy.

12.07-S-01 Freight and Logistics

It is suggested that this text be supported by a map which clearly identifies 'freight gateways and precincts'. A logical place for this map is to sit adjacent to the text.

Recommendation 23: That the 'freight gateways' and 'freight precincts' referred to in Clause 12.07-S-01 Freight and Logistics be provided adjacent to the text.

Other comments

02.01-S-04 Economic Context

It is suggested that paragraph 2 of 'Changing Transport Task', (which is identified as new text), be reworded from....'*The effectiveness of Victoria's future transport system will depend on how well it accommodates population growth, economic change and changes in land use*'.... to 'The effectiveness of Victoria's future transport system will depend on how well it *plans for* and accommodates population growth, economic change and changes in land use'.

This is an important distinction and it is critical that transport corridors be identified and reserved prior to urban expansion. The need for such foresight is evidenced in the western region of Melbourne where, in recent years, poorly planned urban sprawl, particularly in Point Cook on the southern side of the Princes Freeway, now effectively prevents the introduction of any other mode of transport other than motorised vehicles. Fifteen years ago, the reservation of land for a north/ south rail corridor across farm land in Point Cook linking to the Werribee rail corridor would have been possible as the land was vacant.

Recommendation 24: That paragraph 2 of 'Changing Transport Task' be reworded to *The effectiveness of Victoria's future transport system will depend on how well it plans for and accommodates population growth, economic change and changes in land use.*

09.09-M00-01 Tourism

Hobsons Bay encourages any future review of the PPF to consider the specific inclusion of significant suburban tourist attractions as well as central city attractions. Notably, Scienceworks, located in Hobsons Bay, attracted 447,708 attendances of the 2.3 million visitors to Museum Victoria in 2011. In fact Museum Victoria was the most-visited museum organisation in Australia that year.¹ Similarly, Seaworks in Williamstown provides a large and unique exhibition space and is easily

¹ <http://museumvictoria.com.au/about/media-centre/media-releases/archive/attendance-records/>

accessible by public transport. Such suburban destinations are part of metropolitan Melbourne and should not be neglected in the objective *To maintain and develop metropolitan Melbourne as a desirable tourist destination* but rather specifically listed.

Recommendation 25: That clause 09.09-M00-1 specifically list Scienceworks Museum and Seaworks as Regionally significant Tourism destinations.

Conclusion and Summary of Recommendations

Below is the summary of the Council's key recommendations articulated throughout the submission. The Council looks forward to the release of the final report.

Recommendation 1: That Hobsons Bay is reconsidered for the list of municipalities affected by Regional Victoria policy at Table 1 in Section 01.03-S-02.

Recommendation 2: That high level policy direction be well developed and/ or supported by planning tools in the VPP to ensure that policy can be effectively translated into planning outcomes at the local level.

Recommendation 3: That state policy on 'Environmentally Sustainable Design' and 'Integrated Water Management' be recognised in the Environmental Context Section at 02.01-S-03 of the PPF.

Recommendation 4: That any future review of the PPF specifically address the inclusion of Environmentally Sustainable Design policy.

Recommendation 5: That the Metropolitan Melbourne Framework map at Section 03.06-M00-02 be corrected by removing the Industrial 3 land on the eastern side of Maddox Road in Williamstown North from the Western State Significant Industrial Precinct.

Recommendation 6: The Metropolitan Melbourne Framework map at Section 03.06-M00-02 size be increased to ensure it is legible. The legend should be contained on the same page as the map. (This is discussed later in this submission).

Recommendation 7: That consideration be given to including Victoria's Cycling Strategy *Cycling into the Future 2013-23* as a guideline for decision makers at section 03.10-S-01.

Recommendation 8: That Clause 05.05-S-02 include objectives and guidelines that provide a direction for managing landfill gas issues and the *Best Practice Environmental Management Guidelines for the Siting, Design, Operation and Rehabilitation of Landfills* (2010) be included as a background document.

Recommendation 9: That any future review of the PPF specifically address supporting policy or planning tools in the VPP, such as 'reverse buffers' to provide definitive guidance to Council's when planning around Major Hazard Facilities.

Recommendation 10: That Guideline 1 at 'Guidelines for Decision Makers' in Section 08.01-S-01 be corrected to give consideration to residential development of four or more storeys.

Recommendation 11: That Strategy 1.1 at Section 10.03-S-01 be reworded to 'Provide education facilities to address:

- demographic trends;
- the existing and future demand requirements; and
- the integration of facilities into communities'.

Recommendation 12: That consideration be given to removing licensed premises from 'Cultural Facilities' and included at section 10.07 with 'Gaming and Brothels'.

Recommendation 13: That objective 1 in section 12.04-S-01 be reworded to 'To maximise development opportunities in *appropriate* areas that can be well served by public transport'.

Recommendation 14: That Strategy 1.2 at Objective 1 at Section 03.09-M00-01 be reworded to promote a partnership approach between state and local governments when planning the development sequence of major urban renewal precincts around Melbourne.

Recommendation 15: That high level policy direction provided at Section 08.01-M-00 be supported by the introduction of an appropriate suite of planning tools in the VPP such as, inclusionary zoning or a nominated percentage figure in housing developments of a certain size/ number of dwellings to ensure that policy can be effectively translated into planning outcomes at the local level.

Recommendation 16: That in any future review of the PPF consideration be given to include strategies at Objective 2 at Section 08.02-S-01 such as a inclusionary zoning or nominated percentage of affordable dwellings in developments of a certain size/ number of dwellings which can 'translate' policy into a land use planning outcome that can be achieved at the local level.

Recommendation 17: That in any future review of the PPF give consideration to introducing tools into the VPP to support and facilitate the delivery of Strategy 4.3 at Section 08.02-S-01 to *Recognise that the provision of social housing is facilitated through a range of funding, delivery and partnership models with external housing providers.*

Recommendation 18: That maps contained in the PPF be produced in 'grey scale'; contain a legend on the same page as the map; and are produced in a size that any text contained on the map is legible.

Recommendation 19: That greater separation be provided between the policy elements of each Clause to ensure that relevant policy considerations are not inadvertently overlooked.

Recommendation 20: Consideration be given to whether 'local' incorporated documents should be identified within the PPF structure to provide a consolidated policy setting for a municipality.

Recommendation 21: That a link to all background documents cited in 'Guidelines for Decision Makers', 'Background Documents' and 'Strategic Planning Guidelines' be provided and maintained

by DTPLI to ensure that all relevant policy documents are readily available to users of a planning scheme.

Recommendation 22: That a map of the areas affected by 'Ministerial Direction 14 Ports Environs' surrounding the Ports of Melbourne, Hastings, Geelong and Portland be included at Section 01.03-S-02 Application of Regional Policy.

Recommendation 23: That the 'freight gateways' and 'freight precincts' referred to in Clause 12.07-S-01 Freight and Logistics be provided adjacent to the text.

Recommendation 24: That paragraph 2 of 'Changing Transport Task' be reworded to *The effectiveness of Victoria's future transport system will depend on how well it plans for and accommodates population growth, economic change and changes in land use.*

Recommendation 25: That clause 09.09-M00-1 specifically list Scienceworks Museum and Seaworks as Regionally significant Tourism destinations.