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David Mayes

Manager Strategic Planning & Sustainability

City of Melbourne

PO Box 1603

Melbourne Vic 3001

Dear Mr Mayes

Future Melbourne – from liveable to sustainable city

Thank you for providing the Port of Melbourne Corporation (PoMC) with the opportunity to make comments on the consultation draft – Future Melbourne. We are pleased with the acknowledgment of the Port of Melbourne in the document, and commend the City of Melbourne on this initiative.

City of Melbourne – City Structure Map (pg. 10)

The illustrated map suggests that the freight and logistics precinct of the port extends within the Docklands and E-gate area to the east of Bolte Bridge. Clarification of how the freight and logistics precinct has been shaped will be required given that presently the freight and logistics precinct does not reflect its area of influence. Further, this precinct should also encompass the shipping channels in the Yarra River as they play an integral part of the operations of the port.

City of Melbourne – Major Transport Infrastructure (pg. 17)

PoMC supports the illustrated map which indicates the general alignments of rail links into key port areas. This allows for all stakeholders to be aware of the existing rail alignments that exist within the City of Melbourne. Further, the map should also illustrate the rail lines within the Port, including the Maribyrnong Rail Line.

Time (24 Hour) (pg. 19)

This section must also acknowledge that the Port of Melbourne and associated freight and logistics will also operate 24 hours a day. This is envisaged in a number of freight planning strategies, such as Melbourne 2030. A 24 hour city involves both 24 hour population requirements and 24 hour

business requirements. This will require considerable planning to improve or maintain amenity for residents while allowing efficient movement of freight at night.

Growth and Strategic Areas – Metropolitan Context (pg. 21)

The metropolitan context of the proximity of the port to the City of Melbourne is understated. Further, aspects of Direction 4 of Melbourne 2030 that addresses freight and logistics should be mentioned given the envisaged growth and throughput through the port and it being a key strategic area of state significance. The port needs to be recognised being on the doorstep of the City and given the envisaged growth of both, they should be promoted as growing together.

The City of Melbourne – Introduction (pg. 23)

The Principles for Development have been prepared to ensure that future development is respectful, improves the urban form and structure and minimises impacts on residential amenity. It should also point out that new uses (residential and office) that encroach within close proximity to the port and related freight and logistics areas be developed with measures in place that mitigate against impacts associated with a 24 hour operating port. The encroachment of these uses has the potential to have reverse amenity impacts constraining the operations of the port, freight and logistics areas. There is a need to recognise, respect and protect the key elements of the city and the port.

City of Melbourne – Growth and Strategic Areas (pg. 24)

Consistency with the City structure map on pg. 10.

Docklands (pg. 25)

Note that increasing residential and recreational facilities in the Docklands and other water front areas may lead to more recreational boats and water activities. City planners need to ensure that adequate provision is made to protect important shipping facilities, including channels. This is foremost a safety issue, with recreational boaters needing to operate safely in the river used by large ships. Given the recognised growth in port activity and commercial shipping, coupled with increased security requirements, there is a need to ensure that long term planning does not compromise operational port efficiency.

E-Gate (pg. 25)

City planners need to ensure 24 hour rail and road freight is not negatively affected by development in this area. Further, the Master Plan prepared for E-Gate reflects the importance of the port and transit opportunities to the State with the following quotes taken from the Master Plan:

'the key consideration for redevelopment of the site is to ensure that the State's transport and Port development needs have primacy' and 'in planning for future mixed use development on the site, it will be essential to contain any risk of 'amenity' issues raised by future uses of the E-Gate site impacting on the ability of the Port to grow and to operate on a continuous 'round the clock' basis.'

The Master Plan prepared for E-Gate should also be included as a document to be viewed within See Also on page 28 as it feeds into the broad strategy being prepared with Future Melbourne.

The Port of Melbourne (pg.26)

The wording used implies that the impacts of the port are generally negative. This area should be reworded to reflect some of the positive impacts associated with the port. The economic growth figures included within the consultation draft are incorrect with the port contributing \$2.2 billion to the Victorian economy each year and \$2.5 billion to the national economy annually. Further, the port activities are directly linked to more than 13,700 jobs.

It should also be mentioned that the existing buffer areas between the port and the sensitive uses within the City of Melbourne must be maintained to ensure that the port can continue to operate 24 hours a day unimpeded into the future. Any future encroachment must respect the existing 24 hour port operations and acknowledge that they are developing within a buffer area. The support of integrated transport networks and transport interchanges being developed for freight movement are positive as they provide flexibility of modal choice.

A Vision for Melbourne (pg. 29-30)

The vision should also acknowledge the strengths of the port and logistics in the city including offering support within the vision.

Pathway 2.1 – International City (pg. 55)

This section of the consultation draft promotes Melbourne as an international city and seeks to ensure that the *'business community is prepared to engage with the global economy through international trade, investment, tourism and major events.'* A key strength identified is the airport which provides easy connections with Australia and the world. This section must also identify and include that the Port of Melbourne is a key strength in providing access to international markets as well as within Australia.

Outcomes (pg. 55)

Outcome 2 seeks to have high quality infrastructure supporting business with a competitive port. For this to occur it is imperative that the 24 hour operation of the port must not be constrained by the encroachment of sensitive uses in buffer areas to the port and port access routes.

Indicators (pg. 56)

Given that the port is mentioned within this area, a key indicator would be port trade, which will enable the consideration of the 24 hour operation of the port and congestion in relation to port efficiencies.

Outcomes (pg. 73)

Outcome 3 suggests that a Resource Efficiency Task Force has been convened. PoMC has a general support of these initiatives given that they are consistent with Clinton climate initiative. An integrated approach across stakeholder agencies is critical.

Goal 6 – Connected (pg. 96)

Existing freight, road and rail connections strengths must be maintained and enhanced by avoiding land uses and developments that may impact on their continuing current operations.

Pathway 6.1 – Effective and integrated public transport (pg. 97)

It is not only busses and trams that are negatively affected by excessive car traffic in the CBD and inner metropolitan areas. Both domestic and international freight transport is also negatively affected which can lead to an inefficient freight network which in turn leads to increased costs, pollution and reduced amenity.

Pathway 6.4 – Efficient and sustainable freight network (pg. 104)

The use of the term intermodal hub needs to be carefully considered. The PoMC is currently working on strategies to support the broader sea freight logistics system as well as economic and environmental concerns. Road and rail infrastructure are an important factor in Melbourne's freight network and PoMC supports the transport of freight by both road and rail where it is commercially viable and efficient to do so. The choice of which mode to use however is best left to the market within a broad policy framework set by government.

A dot point identified for *'policy development for the future'* suggests that it will need to address *'the amenity of established, developing and planned future residential areas'*. The Port of Melbourne is an established and operating facility. Any planned future residential areas must have regard to the existing operational needs of the port and ensure that they can continue unimpeded. Further, policy development will need to consider reverse amenity implications with developing and planned future residential areas having regard to the existing operating port, freight and logistic areas and mitigate any potential amenity impacts. To promote growth that is dynamic, community focused and sustainable, developing and planned future residential areas will need to locate in areas that will not impede or adversely impact on the operations of the port, freight and logistics within Melbourne.

Needs (pg.104)

Another dot point should be included that suggests that 'new residential and mixed use areas having regard to their proximity to the port, freight and logistics areas.

Outcomes (pg. 105)

The City of Melbourne may wish to consult more widely on its urban planning than this outcome suggests. The Port of Melbourne Corporation and other stakeholders are concerned to ensure that crucial infrastructure is not constrained by residential encroachments and employ a proactive policy of improving urban amenity around such areas.

PoMC as a stakeholder in the future of Melbourne is concerned that the consultation draft has not given enough consideration to the port, freight and logistics activities within Melbourne. The consultation draft does not go far enough in addressing the demands of freight and logistics or reflect the importance of existing and future infrastructure/industry in inner Melbourne.

The Port of Melbourne is a city port that has shaped the development of Melbourne in the past and will continue to shape Melbourne well into the future. It is a significant state asset that contributes to the overall growth of Melbourne and Victoria. The consultation draft sets out Council's vision for the future development of Melbourne, however the references to the importance of the port and its contribution to Melbourne are understated. The underlying comments through the consultation draft refer to the port generally in a negative manner whereby the port and related freight and logistics movements impact on the general amenity within the City of Melbourne. The focus of the consultation draft in relation to the port is how the port can mitigate these amenity impacts, however remains silent on how developing and future mixed and residential areas can mitigate against the existing presence of the port. Both the port and City of Melbourne need to work and grow together to ensure a sustainable and successful outcome.

Please do not hesitate to contact Dragi Nasteovski on 9683 1374 to further discuss any aspect of the above.

Yours sincerely,



Stephen Bradford

Chief Executive Officer