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20 August 2024

Plan for Victoria Unit  
Department of Transport and Planning  
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**MELBOURNE VIC 3001**

Sent via e-mail: [planforvictoria@transport.vic.gov.au](mailto:planforvictoria@transport.vic.gov.au)

To whom it may concern

### **A NEW PLAN FOR VICTORIA - FRANKSTON CITY COUNCIL'S SUBMISSION**

We refer to above and enclose Frankston City Council's (Council) submission to the Department of Transport and Planning's (DTP) engagement for "Developing a new plan for Victoria" (*Plan for Victoria*) endorsed at the 12 August 2024 Council Meeting.

At this meeting, it was resolved that Council:

- 1. Notes the Victorian Government is developing a new plan for Victoria and, as part of the consultation, the community is invited to provide submissions directly the Victorian Government to help inform the development of the Plan,*
- 2. Expresses disappointment that the State Government has not provided – and does not intend to provide - the people of Victoria with a draft of their new policy document, Plan for Victoria other than the information already made available for comment. This lack of information hinders anyone wishing to make a sensible, genuine, in-depth, educated and informed submission;*
- 3. Notes that the practice of consulting the community on matters that affect them is very important, as it enables the local voice to be heard and taken into consideration;*
- 4. Acknowledges that Council has a proud history of contributing to major pieces of work of planning work undertaken by the State Government, and provides this written submission with the knowledge that it has insufficient information to understand the implications of its submission. Council's written submission highlights areas that could be investigated further, and should be subject to a proper process with the community so as to ensure that they are informed and have the opportunity to make a specific submission should they wish;*



5. *Endorses the written submission to the Victorian Government's engagement in relation to the development of the proposed Plan for Victoria; and*
6. *Endorses the written submission to be lodged with the Department of Transport and Planning by 30 August 2024.*

In response to the proposed *Plan for Victoria*, Council acknowledges there are four (4) pillars that are guiding the conversations with the industry sector, local government stakeholders and the community:

1. **Affordable housing and choice;**
2. **Equity and jobs;**
3. **Thriving and liveable suburbs and towns; and,**
4. **Sustainable environmental and climate action.**

In response to the above pillars, Council (as well as many other stakeholders) participated in the survey, which Council provided feedback on 21 June 2024. We understand that this feedback has helped identify eight (8) Big Ideas to transform Victoria, which are acknowledged as the following:

1. **More homes in locations with great public transport access;**
2. **More housing options for all Victorians, including social and affordable homes;**
3. **More jobs and opportunities closer to where you live;**
4. **More options for how we move from place to place;**
5. **More certainty and guidance on how places change over time;**
6. **More trees and urban greening in our parks and community space;**
7. **More protections from flooding, bushfire and climate hazards; and,**
8. **Greater protection of our agricultural land.**

Council supports the objectives of the current metropolitan planning strategy, *Plan Melbourne 2017 - 2050*, the continuation of sensible planning objectives and collaboration between different levels of government and recommend that this is carried through into the development of *Plan for Victoria*.

Housing affordability and choice is a top priority for Council, including private homes, rental dwellings, new homes for families, or affordable housing. Our planning policies already support moderate urban change and directs density to the right locations in and around activity centres, in particular the Frankston Metropolitan Activity Centre (Frankston MAC).

In compiling this submission, Council seeks 21 recommendations to be addressed in the proposed *Plan for Victoria* under the above four (4) pillars and the eight (8) big ideas. We make these recommendations because we believe in the value of different levels of government working together to improve our planning system for the benefit of local communities.



We look forward to other engagement opportunities and the release of *Plan for Victoria*. Should you have any questions, or require anything further, please contact Brooke Whatmough – Coordinator Strategic Planning on (03) 9784 1989 or email on [brooke.whatmough@frankston.vic.gov.au](mailto:brooke.whatmough@frankston.vic.gov.au)

Yours faithfully

A handwritten signature in blue ink, appearing to read "P. Cantillon", with a long horizontal flourish extending to the right.

Phil Cantillon  
**CHIEF EXECUTIVE OFFICER**



# Plan for Victoria

Frankston City Council Submission

12 August 2024



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## 1. Frankston City

Frankston City is situated on the eastern shore of Port Phillip Bay approximately 40 kilometres south of Melbourne covering an area of approximately 131 square kilometres on the lands of Boonwurrung/Bunurong peoples of the Kulin Nation. The western boundary of the City consists of approximately 9.5 kilometres of Port Phillip Bay coastline. The municipality is part of Melbourne's Southern Metropolitan Region shared with the Local Government Areas (LGAs) of Kingston, Mornington Peninsula, Greater Dandenong and the growth area of Casey.

The municipality is largely residential and includes the established suburbs of Frankston, Frankston North, Frankston South and Seaford, and the recent growth areas of Carrum Downs, Langwarrin, Sandhurst and Skye. Frankston City also has large tracts of established commercial and industrial land that are important generators of employment and economic activity within the municipality and the wider region, providing approximately 16,800 jobs.

The land outside of the urban growth area is located within Frankston's Green Wedge. This area comprises of approximately 4,500 hectares and supports a mix of agricultural activities, environmental and open space areas including the Seaford Wetlands and the Eastern Treatment Plant.

Frankston City has seen significant change in recent years, with a 20 per cent increase in population in a 20-year period from 2001 to 2021. The population of Frankston City is expected to grow from approximately 142,826 in 2023 to approximately 161,660 by 2041, representing an additional 18,834 people. The majority of this growth is predicted to occur in existing greenfield pockets within areas such as Skye, Carrum Downs and Langwarrin, as well as areas identified for residential growth within the Frankston Metropolitan Activity Centre (the FMAC). New infill housing will also occur in Frankston's established suburban areas.

Frankston's community is characterised by an aging population, with declining numbers of younger persons, smaller household sizes, slightly lower household income than the Melbourne average, a slightly higher proportion of single parent households, a higher proportion of people with no tertiary qualifications, and a lower proportion of overseas born than the metropolitan average.

The municipality's bayside location and remaining areas of remnant bushland and wetlands provides a recreation resource for both the municipality and the region. The coast and foreshore reserve, wetlands, bushland reserves and corridors are of regional significance to the conservation of biological diversity.

The municipality's transport infrastructure provides excellent vehicular access to Melbourne and Mornington Peninsula via East Link and Peninsula Link, which provide important connections and are an attraction for residents, business and industry. The railway line and bus connections are a vital component of the municipality's transport infrastructure and require constant monitoring and updating in order to meet the needs of the current and future residents. The transport network also provides links to employment nodes within Greater Dandenong, Kingston, Monash and Casey.

The municipality is home to a number of significant regional facilities, including the Monash University Peninsula Campus, and Chisholm Institute's Frankston Campus, the Peninsula

Health Frankston Hospital, a number of private hospitals, the Frankston Arts Centre and McClelland Art gallery, all drawing from metropolitan and regional areas.

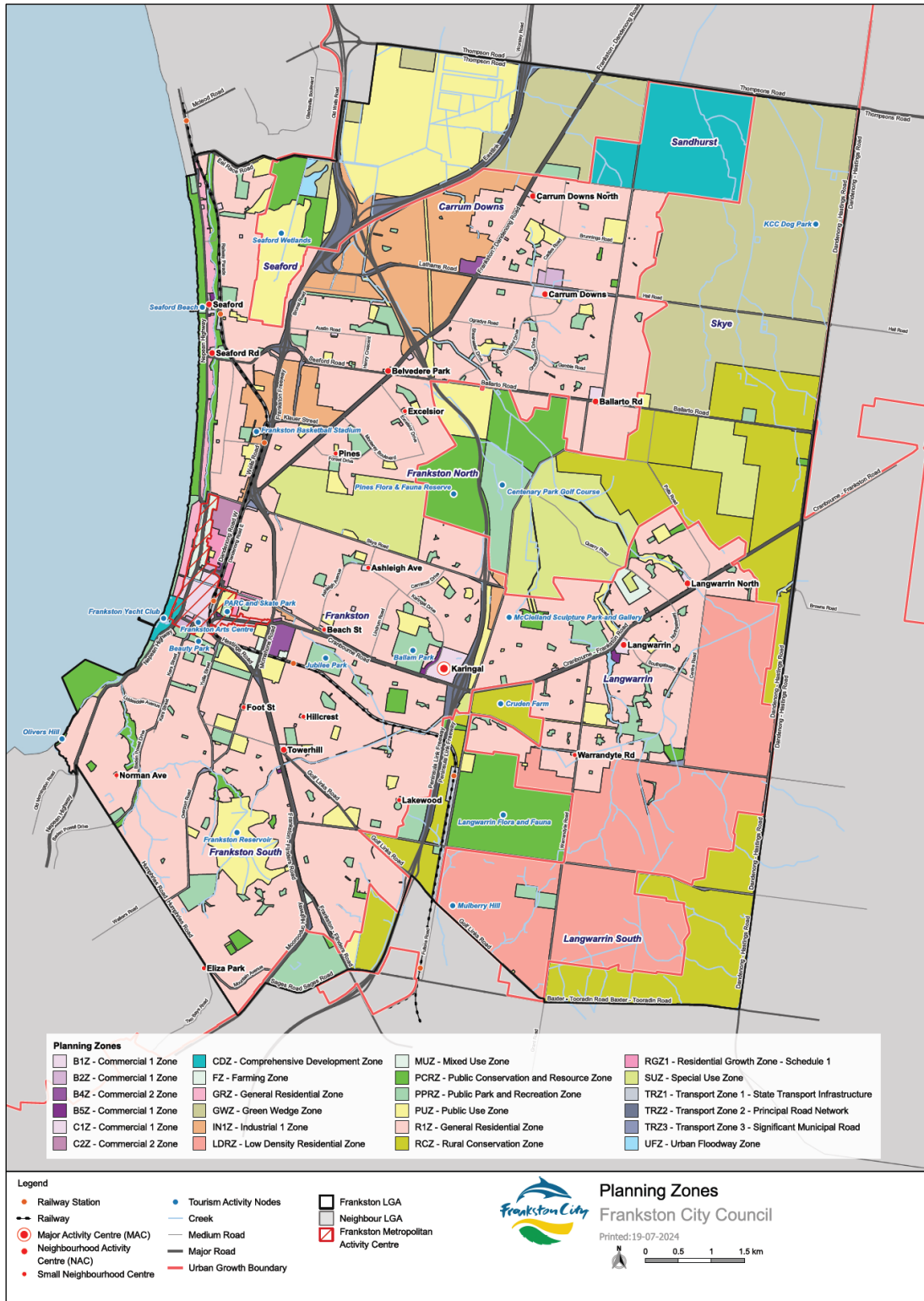


Figure 01: Map of Frankston City





## 2. Council's response to Plan for Victoria

Council makes 21 recommendations in response to the four (4) pillars, the eight (8) big ideas and the draft state-wide housing targets, and encourages these to be reflected in the proposed *Plan for Victoria*.

### Pillar 1: Affordable Housing and Choice

- **State-wide housing targets**

On Monday 17 June 2024, draft state-wide housing targets were released, identifying the number of homes to be built between now and 2051 across the state. Housing in Frankston City will increase by an additional 36,000 dwellings, required to be constructed by the year 2051. In 2023, the total number of dwellings in Frankston City was 59,800.

Council recognises that there is a housing crisis and understands the need for an increase in not only the number of dwellings, but also housing diversity and housing affordability and is currently planning to address this through the *Frankston Metropolitan Activity Centre Structure Plan – June 2023* (and its associated Planning Scheme Amendment C160fran), the development of the *draft Frankston City Housing Strategy* and the *draft Frankston City Affordable Housing Policy*. This level of planning and development facilitation is particularly important in the current housing crisis, however strong guidance and collaboration is needed from the Victorian Government in directing where these dwellings are to be located.

Council submits that the proposed draft housing targets must be reconsidered and reduced, and welcomes the opportunity to work with the state in a bottom up approach, informed by technical studies, that will set realistic dwelling targets. Careful consideration needs to be given to these, so that Frankston can retain enough land supply into the longer term, while protecting the green wedge and its unique residential areas.

The additional 36,000 dwellings equates to an approval rate of approximately 1,285 dwellings per year. Council's dwelling approvals for 2022-2023 financial year were 533 and 679 for the 2021-2022 financial year. While planning approvals are one part of the equation, the construction rate of homes is falling due to a number of complex challenges facing the construction industry and Council urges the Victorian Government to make changes to and advocate to improve supply-chain logistics for construction that is required to help deliver housing that is needed now and into the future.

Council seeks the implementation of the draft state-wide housing targets to include housing diversity targets and a fixed percentage of affordable housing when finalised and implemented into the Victorian Planning Provisions (VPP).

#### a. **Frankston Metropolitan Activity Centre Structure Plan – June 2023**

While Metropolitan and Major Activity Centres are locations identified for change and growth, the right balance must be struck to ensure that strategic planning for these centres ensures the right outcomes. It is important that development, open space and streets have access to sunlight, that built form is responsive to its environment, streets are of a human scale and that these centres remain liveable – the very essence of Melbourne, 'the world's most liveable city'.





Significant work has been undertaken to inform the built form outcomes in Council's *Frankston Metropolitan Activity Centre Structure Plan – June 2023* and the proposed Activity Centre Zone – Schedule 1 (Planning Scheme Amendment C160fran was recently considered by Planning Panels Victoria).

The need for economic and housing growth in the Frankston Metropolitan Activity Centre (FMAC) does not rescind the importance of its coastal setting, the environmental values and some sensitive residential interfaces and it has been developed in a way that growth is facilitated for, while respecting its environmental and sensitive physical interfaces. It is Council's obligation (as the Planning Authority) to ensure that this planning is done so with the appropriate checks and balances to ensure that growth is managed sustainably and with due regard to the broader context.

Particular consideration has been given to the impact of heights on overshadowing, with a view to creating a positive experience within the streets and the public realm and taller building heights are accommodated where overshadowing impacts to key streets can be managed.

It is important that the FMAC is not viewed to do the majority of the 'heavy lifting' for Frankston's housing targets, as increases in height to achieve additional capacity must be done so carefully as to not undermine the liveability and sensitives of this Metropolitan Activity Centre that have been carefully planned for. The FMAC is unique in its coastal setting, located 40 kilometres from the Central Business District (CBD) and **must not** become another Box Hill.

- **Location of housing choice**

Providing a choice of housing types in highly serviced locations (i.e. activity centres), while protecting areas that have strong neighbourhood character elements, are high value ecological areas or impacted by constraints such as bushfire, erosion and flooding must be a key consideration in the *Plan for Victoria*.

Frankston City has a Metropolitan Activity Centre, the FMAC and a Major Activity Centre (Karingal Major Activity Centre (MAC) as identified in *Plan Melbourne 2017-2050 (Plan Melbourne)*, both which have capacity to accommodate population growth and an increase in dwellings. It is important to note that the Karingal MAC is not serviced by a train station and is car based due to its location adjacent the Peninsula Link and Frankston-Cranbourne Road.

Council is currently developing the *draft Frankston City Housing Strategy*, which has been planning for an increased population of 20,000 people over the next 15 years or 9,000 dwellings. Increased housing in is being explored in well serviced locations such as the FMAC (subject to its own Structure Plan, the *Frankston Metropolitan Activity Centre Structure Plan – June 2023* (and part of the Department of Transport and Planning's (DTP) Activity Centres Program), the Karingal MAC and the Carrum Downs Neighbourhood Activity Centre (the Carrum Downs NAC).

Other NAC's will be able to accommodate some growth, however it is important to strike the right balance, and consideration is being given to applying minimal change and/or minimal growth to locations where there are environmental constraints or strong neighbourhood character elements (such as low density) to retain housing diversity across the municipality and preserve areas that make Frankston City unique.



As one of very few genuine blended Bush-Bay-Cities, our unique landscapes, vibrant activity centres and distinctive neighbourhoods make Frankston City a great place to live. Our housing is beautifully diverse with luxurious beach-side homes, modern city centre apartments, bush blocks and new urban areas. These must be enhanced and protected.

- **Housing affordability**

Housing affordability is a nationwide issue and in response to this, Council is in the process of developing a *draft Affordable Housing Policy* which will sit alongside the *draft Frankston City Housing Strategy* which is currently under preparation. The intention is for the *draft Affordable Housing Policy* to be adopted by Council and guide outcomes in relation to affordable housing development and contributions.

As part of the Policy, Council is advocating for new planning mechanisms to improve the facilitation of affordable housing in new developments, such as inclusionary zoning, and direct government investment in local social and affordable housing projects. This is particularly applicable for the redevelopment and disposal of state-owned land that is well located in terms of access to services, jobs and public transport.

An easier, mandatory affordable housing mechanism must be considered as part of the *Plan for Victoria*, prioritising locations that are close to services, jobs and transport and in locations where there is a cluster of key workers, such as a health and education precinct.

The intention of this is to increase new dwelling stock that is affordable for key workers, ensuring that they can live close to work and other services and enable employers with better job matching from a local labour pool.

Council would welcome the opportunity to work with the Victorian Government in the development of mandatory mechanisms.

#### **Pillar 1 Recommendations:**

1. Reconsider and reduce the draft state-wide housing target of 36,000 dwellings by 2051 for Frankston City and work with Council in a 'bottom up' approach that is informed by technical studies (and consideration of Council's strategic planning work) to inform a realistic dwelling target that does not negatively impact on the unique areas of Frankston City.
2. Work with Council in determining locations for increased housing and housing diversity in highly serviced locations, while respecting areas that have been carefully planned for, have strong neighbourhood character and environmental constraints.
3. The Victorian Government to make changes to, and advocate to, improve supply-chain logistics for construction that is required to deliver housing now and into the future.
4. Implementation of reduced state-wide housing targets into the Victorian Planning Provisions to include housing diversity targets and a fixed percentage of affordable housing.



5. Provide a mechanism to deliver affordable housing in all Victorian Planning Schemes (such as inclusionary zoning).
6. Direct government investment into local social and affordable housing projects (particularly applicable for the redevelopment of state-owned land).

## Pillar 2: Equity and jobs

- **Review of Melbourne’s Industrial and Commercial Land Use Plan (MICLUP)**

An increase in population requires an increase in employment opportunities and it is essential that a large proportion of these jobs are provided locally, reducing the need for people to commute to work. This has the flow-on benefit of reducing road and traffic congestion, reducing the emissions (a Victorian Government commitment) that travel generates and saving valuable commuting time. Encouraging diversity of employment and new opportunities for employment should be a focus of *Plan for Victoria*, so that more Melbournians can work closer to home, regardless of where they live.

Council recommends a thorough review of *Melbourne’s Commercial and Industrial Land Use Plan 2020* (MICLUP) to determine a balanced ratio between the housing capacity and the employment capacity that needs to coincide with the expected population growth.

Within this review, there also needs to be flexibility in different land uses where primary industrial uses may not be viable in areas identified as Regionally Significant Industrial Land. Council has recently adopted the *Frankston City Industrial Strategy, March 2024*, which identifies Sub Precinct 1A: Kananook (located within the Industrial Precinct 1: Seaford) as an area that will assist in strengthening the Seaford Precinct as a regional employment destination supported by sport, leisure and hospitality uses.

This location is close to services that support an activity centre, such as public transport, community and education facilities and open space. While Council supports the retention of primary industry uses and acknowledges that Kananook is a regionally significant industrial area, this location has the potential to become an activity centre or at least, has the ability to accommodate other uses such as commercial and limited residential. Council could be given the opportunity to investigate new land use zones for such areas, for example the Commercial 3 Zone.

The Commercial 3 Zone can be used to help facilitate business growth and innovation in select parts of Victoria. It is a mixed-use employment zone, which is intended to facilitate the establishment and growth of creative industries, small manufacturers and start-up businesses. The zone promotes the creation of dense, economically diverse, affordable, accessible and amenity-rich precincts that are attractive to new and emerging businesses. It also provides the option for limited residential uses that do not undermine the primary employment and economic development focus of the zone.





**Figure 02: Sub Precinct 1A: Kananook Special Investigation Area.**

There also needs to be a review of underutilised land in locations that are in close proximity to existing services and principal transport/freight networks that could be investigated for employment (both commercial and industrial).

- **Future Health and Education Precinct**

Frankston City's largest industry sector is healthcare and social assistance, employing over 11,000 people (since 2021) and adds \$1.08 billion into the economy. With the \$1 billion redevelopment of the Peninsula Health Frankston Hospital (underway), this sector continues to rapidly expand and presents a range of opportunities for primary and allied health businesses for more specialised services.

Council welcomes the opportunity to work with the Victorian Government and local institutions to understand, plan and unlock broader economic opportunities and increase local business connections to support the growing sector around both the Peninsula Health Frankston Hospital and the Monash University Peninsula Campus. A strategic policy/future structure plan needs to be prepared to guide the use and development of the Health and Education Precinct as identified in *Plan Melbourne* and implemented into the Frankston Planning

Scheme. This has been reaffirmed in the *Frankston Metropolitan Activity Centre Structure Plan – June 2023* at Action #3. If a partnership could be established and this work undertaken, it will help inform the development of the *draft Frankston City Housing Strategy*.

3	<b>Health and Education Precinct Plan</b> Prepare strategic policy to guide the use and development of the Health and Education Precinct as identified in the Southern Land Use Framework Plan and implement this into the Frankston Planning Scheme.	<b>City Futures</b> (Lead)	DTP  Monash University  Peninsula Health	Short	Precinct Plan adopted by Council.	Objective 2 Strategy 2.1
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**Figure 03:** Action #3 from the *Frankston Metropolitan Activity Centre Structure Plan – June 2023*



**Figure 04:** Indicative Study Area for Health and Education Precinct Strategic Plan

- **Public Transport network review**

While there has been both transport and community improvements over the last decade, more work needs to be done to build a truly integrated transport network. *Plan for Victoria* needs to recognise how activity centres act as transport nodes for buses and trains, with the aim of providing bolstered services (especially for buses) which connect to train stations and the provision of rail networks to those activity centres that are currently car based.

With the projected increase of population and housing (the state-wide target of an additional 36,000 dwellings to be constructed in Frankston City) and the employment opportunities that must be provided to support the increased population, there needs to be a review of all



transport infrastructure (including roads), frequencies of the Frankston line service, as well as the consideration of express services for both city bound and out bound services, both on and off peak.

Where fixed rail does not exist, it is important that the bus network and frequency of service is given priority, providing direct links to train stations. This is important for suburbs such as Carrum Downs and Langwarrin, which rely on bus services as the only form of public transport.

If the Victorian Government is focussed on securing 70 per cent of Melbourne's growth in established areas, the delivery of improved public transport in areas of growth must be central to planning solutions in *Plan for Victoria*.

As part of creating a sustainable transport network that, we request that serious consideration is given to electrification beyond the Frankston Train Station.

#### **Pillar 2 Recommendations:**

7. Undertake a review of the *Melbourne Industrial and Commercial Land Use Plan 2020*, ensuring that there is flexibility in different land uses where primary industrial uses may not be viable in areas identified as "Regionally Significant Land".
8. Partner with Council to prepare a strategic policy to guide the use and development of the future Health and Education Precinct as identified *Plan Melbourne 2017 - 2050* and the Southern Land Use Framework Plan and to implement this into the Frankston Planning Scheme.
9. Undertake a review of all transport infrastructure and public transport in Frankston City, including (but not limited to) train service frequencies for the Frankston line (including express services to and from Frankston) and a review of all bus routes (including those that service all train stations that run through industrial and residential areas) with a view to increase infrastructure, services and frequencies to cater for future growth.
10. Consider rail electrification beyond the Frankston Train Station.



## Pillar 3: Thriving and Liveable Suburbs and Towns

- **Increasing our activity centre network to direct growth with the right infrastructure**

Melbourne's network of Metropolitan and Major Activity Centres provides a pre-existing framework for urban growth. However, with increasing efforts to provide more housing in these centres, strengthening our network of activity centres must be a key outcome of *Plan for Victoria* and it must recognise that different activity centres have different opportunities and constraints and encourage local planning to reflect this.

As outlined, Council has both a Metropolitan Activity Centre (the FMAC) and a Major Activity Centre (Karingal MAC) as identified in *Plan Melbourne*, both have capacity to accommodate population growth and an increase in dwelling numbers as they are well serviced locations. Through the development of *draft Frankston City Housing Strategy*, Council is exploring the potential to increase dwelling stock in other highly serviced locations such as Neighbourhood Activity Centres (NACs), in particular the Carrum Downs NAC.

### a. Redesignation of the Carrum Downs Neighbourhood Activity Centre

In *Plan for Victoria*, Council seeks the inclusion and redesignation of the Carrum Downs NAC as a Major Activity Centre (MAC). The Carrum Downs NAC is similar to Karingal MAC, serviced by existing bus services, which provide connections from the Carrum Downs Regional Shopping Centre (which includes K-Mart) to surrounding residential land as well as through to the Frankston MAC and Frankston Station. It is a relatively new established suburb that has two (2) large shopping centres, a library, five (5) schools, substantial medical facilities (no hospital) and a community centre. The total area of land zoned Commercial 1 Zone is comparable to the amount of land zoned Commercial 1 Zone in the Karingal MAC (see comparison below).



**Figure 05:** Map comparison of the Commercial 1 Zone land size of both Karingal MAC (left) and Carrum Downs NAC (right)





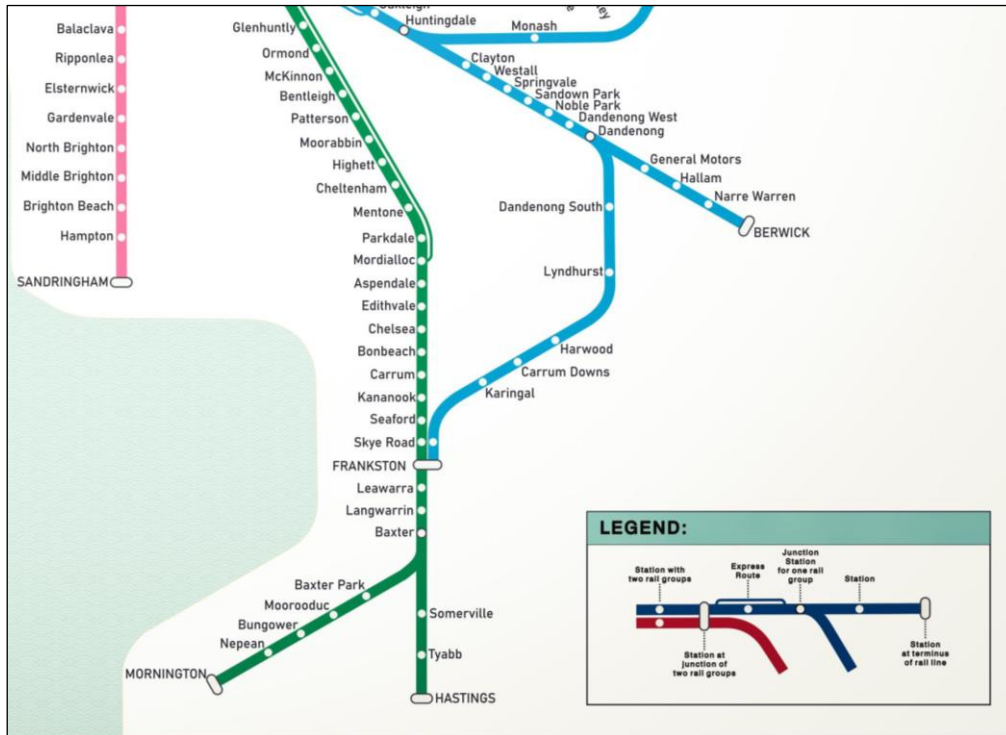


Figure 07: Digitised 1969 Melbourne Transportation Plan

### c. Carrum Downs open space shortage

Carrum Downs has an under supply of open space, particularly open space that supports sporting and active recreation. Identified in the *Frankston City Open Space Strategy 2016 - 2036* sporting open space provision is 1.29/ha/1000 persons falling to 0.96 ha/1000 persons by 2031. Increased housing development is resulting in a loss of green space. It is critical that open space in Carrum Downs is not only maintained but also increased in line with forecast population growth. This is in line with an overall increase of open space provision that is required for Frankston City, is outlined further in this submission.

- **Living locally**

Walkable, connected communities are at the core of planning for sustainable development, and Council supports the retention of the 20-minute neighbourhood principle (*Plan Melbourne*) / living locally within *Plan for Victoria* as a good urban planning outcome.

Smaller centres that are located away from key transport corridors also serve as important hubs for living locally for existing residents, with small clusters of shops, community facilities and open spaces that cater for lower density areas. These smaller centres support various economic, social, health and environmental benefits for their local communities. As the population increases, smaller NACs will accommodate increased population levels and public transport services need to expand in line with this.

To enable a greater expansion of living locally, more support is needed to deliver pedestrian safe environments, and streets with high amenity for users of all ages and abilities. As part of Council's *Integrated Transport Strategy 2023*, Council has identified a number of key walking



and cycling streets are ideal for improved pedestrian and bike infrastructure. These initiatives help enable sustainable travel, however more collaboration is needed at all levels of government to implement a comprehensive vision.

- **Infrastructure delivery and cost**

A key issue identified with outward urban expansion is the heightened cost of providing new infrastructure in growth areas, whereas established suburbs tend to have greater access to quality infrastructure, whether this be established schools and transport routes.

The proposed draft state-wide housing targets will require significant investment in existing infrastructure to cater appropriately for the growing population in Frankston City there is still a need to continue to invest equally in infrastructure across greater Melbourne to create those broader networks. Coverage gaps in infrastructure for growth areas are already noted, and existing suburbs with increasing populations similarly need a high level of community, education and health infrastructure investment to maintain pace with population growth.

The planning and delivery of community infrastructure is critical to support growing communities, from transport to open space to schools etc. How these are to be funded given the current financial climate, and the inability for Council's to provide the financial shortfall that comes with the implementation of a local Development Contributions Plan (DCP), needs to be carefully considered.

It is recognised that developer contributions are one (1) mechanism that can play a role in the delivery of infrastructure. As it is a contribution only, consideration needs to be given to the capacity of local government to meet its commitment to the balance of the cost.

- a. Development Contribution Plans (DCP)**

Development Contributions Plans (DCPs) are out-dated in their approach and quantum to infrastructure provision, they are also expensive to prepare and are becoming more challenging for Council to commit to in the current economic climate. Some municipalities (such as Frankston City) do not have a municipal wide DCP scheme; others have a DCP but the cost of infrastructure has not kept up with the collection rate, even with CPI increases.

Recently, Frankston Planning Scheme Amendment C161fran was prepared and exhibited to implement the *Frankston Metropolitan Activity Centre Development Contributions Plan (April 2024)* via the introduction of the Development Contributions Plan Overlay (DCPO) into the Frankston Planning Scheme for the FMAC, requiring a development infrastructure levy to be paid when new development is undertaken.

Whilst there are a number of infrastructure projects identified in the *Frankston Metropolitan Activity Centre Structure Plan – June 2023*, only (2) infrastructure projects have been selected to be included in the DCP due to the increased costing of delivering the projects and in the current economic climate.

If a state led DCP is being considered, it must be developed in collaboration with each Council as developer contributions are complex and can have a dramatic impact on Council expenditure as Council must make up the 'shortfall' that come from DCP's and are required to balance new projects with increased renewal requirements and surging costs.



## **b. State Government taxes and charges**

While providing infrastructure commensurate with population growth is critical, it is important the State recognises the cumulative impact that a range of financial charges are having on the development of land in Victoria and recommend a review of all taxes, levies and contributions that are in place across the state.

The Growth Area Infrastructure Charge (GAIC), the Metropolitan Planning Levy (MPL), any local DCP, open space contribution, Parking Overlays, Windfall Gains Tax (WGT), Building Permit Levy and the Vacant Residential Land Tax, coupled with high interest rates and a struggling construction industry, are all costs that are impacting the feasibility of development in Victoria. These financial burdens can lead to increased housing prices, reduced affordability for homebuyers, and slower development timelines. Additionally, these charges can deter investment and stifle innovation and competition within the industry, leading to a less dynamic housing market. A comprehensive review of these taxes and levies are essential to foster a more conducive environment for sustainable and affordable housing development, particularly in areas designated to accommodate significant population growth through infill development.

As part of *Plan for Victoria* engagement, DTP suggested that they were looking to make significant changes in the way in which DCPs are collected, by potentially establishing a single rate for a municipality without Council's having to undertake a full planning scheme amendment process. Council would welcome this, and would welcome any engagement in such process that also outlines a clear timeframe for any proposed changes.

- **Increasing the provision of public open space**

The provision of open space is fundamental to a community's quality of life. Planning for open space is vital to ensure that both new and existing residents have sufficient access to a variety of open space types for both active and passive recreation purposes. The benefits of having access to high-quality open space are well known and in Frankston City, we have made significant investment across the municipality to improve and upgrade our existing open space network.

However, a growing population means that our current open spaces must continually work harder to support more intensive use. This is exacerbated by the increasing cost of land which makes the viability of purchasing land to provide for new open space increasingly difficult, particularly when considered on balanced with the increasing cost of other civic projects for local government. The demand for new housing is also in direct competition with open space, and Council needs to secure open space land now before it is lost completely to development.

Many of our greatest gaps in public open space provision are located around the activity centres and these are the areas that will see more intense development. *Plan for Victoria* must prioritise investment in creating additional open space to municipalities with identified gaps in open space provision, such as Frankston City.

Planning policy directs most medium and higher density developments to metropolitan and major activity centres, and *Plan for Victoria* should be clear about how the State Government plans to work with councils to partner in the investment of new open space in evolving communities to ensure that everyone has equitable access to high quality public open spaces that are fit for purpose.



Council would welcome clarification in relation to what changes the DTP may make to the collection of open space contribution when land is subdivided and if a reduction to the amount of open space available per resident is proposed?

**Pillar 3 Recommendations:**

- |   |
|---|
| <b>11.</b> Re-classify and elevate the Carrum Downs Neighbourhood Activity Centre to a Major Activity Centre.   |
| <b>12.</b> Provide a rail connection to the Carrum Downs Neighbourhood Activity Centre, the Karingal Major Activity Centre and beyond, generally in accordance with the <i>1969 Melbourne Transportation Plan</i> .           |
| <b>13.</b> Review and amend all taxes, levies and contributions that are in place across the state to address the cumulative impact that these are having on the development of land in Victoria.                             |
| <b>14.</b> Retain the 20 minute neighbourhood principle from <i>Plan Melbourne 2017 - 2050</i> as 'Living Locally'.   |
| <b>15.</b> Provide clear direction about how the Victorian Government will partner with councils in the acquisition of new open space to ensure that everyone has equitable access to, new and improved public parks / space. |
| <b>16.</b> Prioritise investment in creating additional open space to municipalities with identified gaps in open space provision, such as Frankston City.  |





## Pillar 4: Sustainable Environmental and Climate Action

- **Implementation of a consistent planning response to inundation and sea level rise projections**

*Plan for Victoria* must recognise that urban flooding will become a more significant issue as a result of climate change, and prioritise upgrades to the planning system that will facilitate the effective management of and response to this hazard.

Council urges the Victorian Government (particularly in nominating locations where there is an expected increase in population and built form i.e. activity centres) to review locations where increased housing may not be suitable due to environmental constraints and to provide a clear implementation plan in relation to how it will legislate modelled flood extents so that the risk can be appropriately managed.

Low-lying coastal areas with established residential properties at high risk from flooding in Seaford and along the Kananook Creek are of particular concern for Frankston City.

Council understands that Melbourne Water are developing flood modelling for many metropolitan Councils (including Frankston City). It is recommended that immediate consideration and action must be given to how this modelling will be implemented into all planning schemes and we suggest that a similar approach is undertaken for flooding that is undertaken for bushfire planning, implemented at the state level.

When the Bushfire Management Overlay (BMO) or the Bushfire Prone Area (BPA) mapping is updated, the Victorian Government and the relevant fire authority implement these updates through a state wide (VC) or Group of Councils (GC) Ministerial Planning Scheme Amendment, given the importance of bushfire planning and the protection of human life. This approach would give Council, community and developers immediate certainty on not only the hazard risk but where housing growth can be accommodated or where it can be managed through appropriate design.

### **a. Flooding**

Melbourne Water appear to have adopted a conservative approach to flood modelling, with a lower tolerance for risk and limited engagement with stakeholders. With the draft housing targets, stakeholders need to clearly understand the extent of flooding impact and the acceptable level of flood risk across the State. By providing clarity on Melbourne Water's approach to risk and expectations for development in flood prone areas, development can be undertaken with greater certainty which will assist Council and developers in meeting housing targets.

Despite the release of the draft housing targets, Melbourne Water are currently objecting to new and replacement development (knock down and re-build) in areas that are - and are not - impacted by flooding overlays. We acknowledge modelling work that is currently being undertaken in partnership with some Councils and Melbourne Water, however it is unclear at this stage what that modelling will show and how much land will be undevelopable given Melbourne Water's approach.



It would be desirable to have a better understanding of Melbourne Water's approach as to what land is unsuitable for residential development and whether that land would be more suitable for commercial or industrial development or open space. This could provide important employment and recreational opportunity for a growing population.

As stated above, responding to flooding in a similar way to how fire risk is managed by the BMO planning control, provides developers, land owners, home occupiers a clear and immediate understanding of the risk that they face when buying or living on such properties.

If Melbourne Water are to continue with a conservative approach with regard to flood risk, then greater weight should be given to flood risk in the planning scheme.

Fit-for-purpose flood mapping is required to indicate the location, extent, depth and velocity of flooding under both current and climate change conditions. These flood maps can be used for land use planning, community awareness and (where practicable) flood mitigation works. The information will help manage flood risk to life, property and community infrastructure and assist with protecting our significant floodplains.

## **b. Coastal resilience**

As a coastal municipality, coastal inundation associated with Sea Level Rise (SLR) and storm surge coupled with coastal erosion is another hazard relevant to the success of Frankston City's long-term planning. The *Marine and Coastal Policy 2020* identifies the need to plan for SLR not less than 0.8 metres by 2100, and allow for the combined effects of tides, storm surges, coastal processes and other local conditions when assessing risks and impacts associated with climate change.

The current SLR benchmark of 0.8 metres by 2100 based on the 5<sup>th</sup> IPCC Assessment Report modelling from 2014 has been superseded by modelling from IPCC's 6<sup>th</sup> Assessment Report in 2023. Council notes the regionalisation of CMIP6 SLR projections for Australia undertaken by CSIRO and DEECA's further work to date to reflect these findings in the Victorian context. Council understands that Victorian Government is in the process of approvals for new benchmark and process for future reviews and updates that will inform implementation of transition arrangements for the new benchmark, including changes to the Victorian Planning Provisions.

*Plan for Victoria* should recognise that coastal hazards are becoming a more significant issue as a result of climate change posing substantial cost and risk implications. Similarly to its treatment of catchment flooding, *Plan for Victoria* should review locations where increased housing may not be suitable due to coastal hazard constraints, including the compound risk of inundation and erosion. It should provide a clear implementation plan in relation to how it will legislate projected coastal hazard extents modelled in the Port Phillip Bay Coastal Hazard Assessment along with regional and local hazard assessment studies so that the escalating inundation and erosion risks and emergency response challenges for vulnerable communities can be appropriately managed.





- **Implementation of Elevating Environmentally Sustainable Design (ESD) targets**

Planning for a better environment is crucial as all levels of government consider the future implications of climate change. Frankston City Council is a member of CASBE (Council Alliance for a Sustainable Built Environment) and is a project partner for the Elevating ESD Targets (Environmentally Sustainable Design) planning scheme amendment, which seeks to encourage a move towards net zero carbon development. Each of the 24 Councils has prepared an amendment, with the intention to create a GC Planning Scheme Amendment.

Frankston Planning Scheme Amendment C157fran has been prepared and submitted for authorisation, which seeks new development incorporate ESD measures that further enhance the following:

- energy efficiency and performance;
- water efficiency and integrated water management;
- low carbon and sustainable transport;
- circular economy;
- materials and sustainable waste management;
- urban greening;
- biodiversity and green infrastructure; and
- climate resilience and adaptation.

Under the proposed changes, new developments will:

1. Produce net zero carbon emissions;
2. Reduce household bills by making buildings more energy efficient; and
3. Provide a healthier and more comfortable building environment for occupants.

Buildings in Australia are responsible for almost one fifth of direct carbon emissions, and Frankston City Council is supportive of strengthened environmental targets for planning outcomes in *Plan for Victoria*. In advance, Council also seeks science-based targets for high level policy and aligning the Planning Framework to the most up-to-date climate science.

In order to begin making significant changes to improve our environment, Council requests that the Minister for Planning authorise Planning Scheme Amendment C157fran and that *Plan for Victoria* includes direction and action in relation to achieving elevated ESD outcomes.

#### **Pillar 4 Recommendations:**

**17.** Implement a consistent catchment and coastal inundation planning response with consideration of the latest climate change modelling and an updated Sea Level Rise benchmark that clearly identifies high risk environmentally constrained locations and ensures they can be appropriately managed.

**18.** Require Melbourne Water to undertake a planning scheme amendment to implement flood modelling into the Frankston Planning Scheme and recommend undertaking a similar approach for bushfire planning (implemented at the state level) with consideration given to a Group of Councils Planning Scheme Amendment.



19. The Minister for Planning to authorise the Planning Scheme Amendment C157fran, (also sought by 24 other Councils).
20. Implement the outcomes sought by Planning Scheme Amendment C157fran into *Plan for Victoria* to provide direction and outcome in relation to achieving elevated ESD outcomes.

## Additional Consideration Outside the Four Pillars

- **Green Wedge Land and logical inclusions review**

Council is committed to the ongoing retention and protection of green wedge land as it is key to our economic prosperity, providing jobs in agriculture, ensuring food productivity and security, conservation, and tourism and also provides a location for infrastructure that is required to support a growing population.

Council's *Frankston Green Wedge Management Plan 2019* and DTP's *Green Wedge Action Plan 2024* share very similar outcomes in order to retain and promote the Metropolitan Green Wedge land.

The *Frankston Green Wedge Management Plan 2019* requires a review and some of the actions in the *Green Wedge Action Plan 2024* override our actions at a local level.

Council is aware of its existing land use capacity within the UGB and does not require any additional land to be rezoned to facilitate development. However, Council considers that *Plan for Victoria* should consider an action for a **logical and considered** UGB review (undertaken with Councils) that is informed by technical studies, considers land on a site by site basis, with a focus on land that is an anomaly, allowing it to be appropriately rezoned in order to facilitate appropriate development.

It is also important to consider the land use zone used at the interface of the Green Wedge to create an appropriate transition, reduce land banking and pressure on the expansion of the UGB.



**Figure 08:** Example of properties (along Ballarto Road) that are outside the Urban Growth Boundary that could be considered as part of the logical inclusions review.

Figure 08 identifies a number of properties that have been historically subdivided and developed as conventional residential, but are still located in the Green Wedge.

The last logical inclusions review process concluded in 2012, twelve (12) years ago, with significant expansion of the UGB as part of a 'logical inclusion' process. The current UGB was then reaffirmed as the outer limit for growth at Policy 2.1.1 of *Plan Melbourne*. If the State considers a review of the UGB, then Councils **must** be a part of that consultation and the review **must** ensure that technical studies are carefully considered and that large tracts of land are not opened up for urban development as per the last 'logical inclusion' process

### Recommendation:

21. *Plan for Victoria* to consider an action to work with Councils to undertake a **logical and considered** review of the Urban Growth Boundary, that is informed by technical studies, considering land on a site by site basis, with a focus on sites that are anomalies - allowing them to be rezoned, facilitating appropriate development. It should also consider land use zones at the interface, creating an appropriate transition to the Green Wedge, reducing land banking and pressure on the expansion of the Urban Growth Boundary.



### 3. Conclusion

*Plan for Victoria* is an opportunity to improve planning outcomes across the state and by balancing the environment, built form outcomes and improving liveability, Victoria will be well-placed for the future.

Council supports the objectives of the current metropolitan planning strategy, *Plan Melbourne 2017 -2050* and the continuation of sensible planning objectives and collaboration between different levels of government and recommend that this is carried through into the development of *Plan for Victoria*.

Housing affordability and choice is a top priority for Council, including private homes, rental dwellings, new homes for families, or affordable housing. Our planning policies already support moderate urban change and directs density to the right locations in and around activity centres, in particular the FMAC.

In compiling this submission, Council makes 21 recommendations in response to the four (4) pillars, the eight (8) big ideas and the draft state-wide housing targets, and encourages these to be reflected in the proposed *Plan for Victoria*. Council makes these recommendations because we believe in the value of different levels of government working together to improve our planning system for the benefit of local communities.

Local government is the closest level of government to the community and we, as the Council, play a significant role in land use planning. We remain eager to partner with all levels of government to deliver good outcomes for our communities and look forward to the release of *Plan for Victoria*.

In support of Council's submission, please find enclosed:

- *Frankston Metropolitan Activity Centre Structure Plan, June 2023*
- *Frankston City Industrial Strategy, March 2024*
- *Frankston City Housing Strategy – Discussion Paper, July 2023*
- *Frankston City Green Wedge Management Plan, October 2019*
- *Frankston City Integrated Transport Strategy, February 2023*
- *Urban Forest Action Plan, 2020*
- *Frankston City Economic Development Strategy, May 2023*
- *Frankston City Open Space Strategy 2016-2036*

## 4. Recommendations

### Pillar 1: Affordable Housing and Choice

1. Reconsider and reduce the draft state-wide housing target of 36,000 dwellings by 2051 for Frankston City and work with Council in a ‘bottom up’ approach that is informed by technical studies (and consideration of Council’s strategic planning work) to inform a realistic dwelling target that does not negatively impact on the unique areas of Frankston City.
2. Work with Council in determining locations for increased housing and housing diversity in highly serviced locations, while respecting areas that have been carefully planned for, have strong neighbourhood character and environmental constraints.
3. The Victorian Government to make changes to, and advocate to, improve supply-chain logistics for construction that is required to deliver housing now and into the future.
4. Implementation of reduced state-wide housing targets into the Victorian Planning Provisions to include housing diversity targets and a fixed percentage of affordable housing.
5. Provide a mechanism to deliver affordable housing in all Victorian Planning Schemes (such as inclusionary zoning).
6. Direct government investment into local social and affordable housing projects (particularly applicable for the redevelopment of state-owned land).

### Pillar 2: Equity and Jobs

7. Undertake a review of the *Melbourne Industrial Land Use Plan 2020* ensuring that there is flexibility in different land uses where primary industrial uses may not be viable in areas identified as “Regionally Significant Land”.
8. Work with Council to prepare a strategic policy to guide the use and development of the future Health and Education Precinct as identified *Plan Melbourne 2017 - 2050* and the Southern Land Use Framework Plan, and implement this into the Frankston Planning Scheme.
9. Undertake a review of all transport infrastructure and public transport in Frankston City, including (but not limited to) train service frequencies for the Frankston line (including express services to and from Frankston) and a review of all bus routes (including those that service all train stations that run through industrial and residential areas) with a view to increase infrastructure, services and frequencies to cater for future growth.



10. Consider rail electrification beyond the Frankston Train Station.

### **Pillar 3: Thriving and Liveable Suburbs and Towns**

11. Re-classify and elevate the Carrum Downs Neighbourhood Activity Centre to a Major Activity Centre.

12. Provide a rail connection to the Carrum Downs Neighbourhood Activity Centre, the Karingal Major Activity Centre and beyond, generally in accordance with the *1969 Melbourne Transportation Plan*.

13. Review and amend all taxes, levies and contributions that are in place across the state to address the cumulative impact that these are having on the development of land in Victoria.

14. Retain the 20 minute neighbourhood principle from *Plan Melbourne 2017 - 2050* as 'Living Locally'.

15. Provide clear direction about how the Victorian Government will partner with councils in the acquisition of new open space to ensure that everyone has equitable access to, new and improved public parks / space.

16. Prioritise investment in creating additional open space to municipalities with identified gaps in open space provision such as Frankston City.

### **Pillar 4: Sustainable Environment and Climate Action**

17. Implement a consistent catchment and coastal inundation planning response with consideration of the latest climate change modelling and an updated Sea Level Rise benchmark that clearly identifies high risk environmentally constrained locations and ensures they can be appropriately managed.

18. Require Melbourne Water to undertake a planning scheme amendment to implement flood modelling into the Frankston Planning Scheme and recommend undertaking a similar approach for bushfire planning (implemented at the state level) with consideration given to a Group of Councils Planning Scheme Amendment.

19. The Minister for Planning to authorise the Planning Scheme Amendment C157fran (sought by 24 other Councils).



20. Implement the outcomes sought by Planning Scheme Amendment C157fran into *Plan for Victoria* to provide direction and outcome in relation to achieving elevated ESD outcomes.

#### **Additional Consideration Outside the Four Pillars**

21. *Plan for Victoria* to consider an action to work with Councils to undertake a ***logical and considered*** review of the Urban Growth Boundary, that is informed by technical studies, considering land on a site by site basis, with a focus on sites that are anomalies - allowing them to be rezoned, facilitating appropriate development. It should also consider land use zones at the interface, creating an appropriate transition to the Green Wedge, reducing land banking and pressure on the expansion of the Urban Growth Boundary.