



City of  
**KINGSTON**

25 October 2021

James Mant  
A/Director Planning Projects  
Department of Environment, Land, Water and Planning  
8 Nicholson Street  
MELBOURNE 3000

Via website: <https://engage.vic.gov.au/mfpf>

Dear James

## Re: Proposed Southern Metro Land Use Framework Plan

I write in relation to the proposed Southern Metro Land Use Framework Plan and would like to thank you for the opportunity to provide feedback. Overall, the intent of providing a regionally based framework plan is supported. Kingston welcomes commitments contained within the Plan including the delivery of affordable housing; protection and enhancement of the Green Wedge and the Chain of Parks; commitments to sustainability and resilience including an increase in tree canopy across the region; and recognition within the Plan of the regionally significant industrial land and transport links located within Kingston.

This notwithstanding, we wish to raise several matters that Council believes warrant further consideration.

### Chapter 04- Productivity

Council acknowledges the role that the Moorabbin Airport plays as in supplying non-aviation related employment , but importantly notes that its primary role is as a Significant Transport Gateway given its primary purpose **is for aviation**. Council notes the significant contradiction in the draft plan around 'Limiting non-airport related uses around Moorabbin Airport' whilst identifying it as a 'Regionally-Significant Industrial Precinct'. Council believes that a distinction must be drawn and its primary purpose as a Significant Transport Gateway should be how it is primarily recognised in State and Regional planning. To do otherwise irrespective of any classification through the MICALUP undermines both **fundamental safety considerations and the uniqueness of this irreplaceable regional asset** which Direction 1 appropriate reinforces provides the region with a 'significant competitive advantage'. Carefully managing the balance of uses and development in this precinct is critical to ensuring that aviation is not undermined by inappropriate non-aviation related activities.

Council supports Direction 6 regarding the protection of green wedges and would wish to highlight the role that the green wedge plays in Kingston in delivering its Chain of Parks, as landfill sites and extractive resources are phased out and discontinued. On that basis, Council is not supportive of new extractive quarry operations, landfill and or materials recycling in the Kingston Green Wedge, and also notes its strong opposition to the location of the Southern Stabling facility in Heatherton.

In relation to Action 2 – regarding precinct planning for the Cheltenham Suburban Rail Loop precinct, Council seeks to be recognised as an equal and key stakeholder throughout the Suburban Rail Loop project and therefore has a strong expectation that the State Government and Suburban Rail Loop Authority:

- *Ensure that local councils to be seen as equal and key stakeholders throughout the project and integral to ensuring community voices are heard;*
- *Ensure that consultation with the community and with local government on any reform proposals and major planning decisions must occur before reforms are considered or introduced;*
- *Ensure that the community's voice remains central and acknowledges is critical for ensuring a transparent planning system that strengthens local neighbourhoods and economies;*
- *Reinforce that a localised understanding of the community and its concerns are essential in informing planning decisions that can only be delivered by Councils, and*
- *Protect the mechanism and rights of residents to voice their objection and concern to any developments in their local community.*

community inspired leadership

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Council welcomes further opportunities to pursue these goals with both the State Government and the Suburban Rail Loop Authority. Council also believes that further discussion needs to occur prior to 'settling' the Regional Land Use Framework Plan to properly explore with the SRLA and key landowners whether merit now exists in seeking to classify the Cheltenham-Southland Activity Centre as a Metropolitan Activity Centre rather than a Major Activity Centre given the planned investment and aggregation of strategic precincts including the former Highett Gas Works Urban Renewal Area.

Council would also like to highlight the importance of improving cross regional planning and working together with adjoining municipalities and these opportunities are particularly important given the SRL interfaces in areas like Clayton (Monash)/Clayton South and Southland/Cheltenham (Bayside).

## **Chapter 05 – Housing choice**

Kingston is currently undertaking a Housing Strategy and Neighbourhood Character Study, which has been informed by collaborative work officers from DELWP. This project is well progressed and is underpinned by a body of strategic work that aligns with current Victoria in Future forecasts, Planning Practice Notes 90 and 91 and Plan Melbourne. Our proposed Residential Framework Plan appropriately manages our future housing needs by focussing the greatest level of change around our Major activity centres in Kingston and areas that are sufficiently serviced by public transport and supporting services and infrastructure.

We note that our municipality will experience significant change generated by State government investment in once in a generation infrastructure projects, including the Suburban Rail Loop (SRL) and Level Crossing Removal Project. The Housing Strategy and Neighbourhood Character Study appropriately considers areas in which to focus residential growth, such as Highett, Cheltenham-Southland, Cheltenham and within the Monash NEIC which we consider broadly aligns with the SRL project. Concurrent to the Housing Strategy has been work undertaken on our Neighbourhood Character Study which has assisted in determining the areas where it is appropriate to continue to the predominant single and double storey built form (whilst still accommodating growth). This Study has tempered the extent to which taller built form has been considered appropriate in our coastal neighbourhood activity centres, as well as smaller centres that have limited availability of commercial land and infrastructure to support significant increased densities.

The draft LUPF identifies the neighbourhood activity centres of Aspendale, Edithvale, Bonbeach and Carrum as 'housing investigation areas'. Each of these centres has its own context and character that has been considered by Council in our Housing Strategy and Neighbourhood Character Study and would expect that this body of current strategic work informs the final form of the LUPF for our municipality. It is noted each of these centres are designated Neighbourhood Activity centres (with the exception of Chelsea which is a Major Activity Centre) and the context of this hierarchy needs to be considered. Council is currently undertaking a structure planning process for the Chelsea Major activity centre which will guide the application of new zones within the structure plan area and manage change.

Council believes that the new classification of 'Housing Investigation Area' is essentially a replication of the pre-existing classification of Neighbourhood Activity Centres which is widely recognised and holds the same if not broader policy objectives. No basis exists whatsoever for identifying Aspendale Station, Carrum Station, Edithvale Station, Highett Station or Parkdale Station as they are already established Neighbourhood Activity Centres and explicitly referenced in the Kingston Planning Scheme. Beyond replication any such new designation creates confusing and most unnecessary further layering within Planning Schemes. In the circumstances of Kingston, it also runs at odds with the strategic intent to view these areas as 'Neighbourhood Activity Centres' which are capable of (and do) perform a number of other roles (apart from solely housing) critical in achieving 20-minute neighbourhoods.

Council supports Direction 11 and the increase of the supply of social and affordable housing and notes the adoption of its Social and Affordable Housing Strategy in 2020 and advocacy to incorporate affordable housing into development projects as opportunities arise.

## **Chapter 06 – Integrated transport**

Direction 16 – ‘Improve active and public transport options to promote mode shift and support 20-minute neighbourhoods’ is supported. While Strategies 42 - to improve bus service connectivity prior to the delivery of Suburban Rail Loop; and 45 - to improve public/active transport access to major activity centres and Cheltenham precinct (among other destinations) are both supported, additional strategies specifically addressing frequency of service and connections to neighbourhood activity centres would also be welcomed.

## **Chapter 07 – Liveability**

Council agrees with the identified strategies supporting Direction 19 in relation to strengthening the network of open spaces and trail connections and notes again its opposition to the location of the SRL Southern Stabling facility on land earmarked for public open space as part of the Chain of Parks. This site has been earmarked (through a well-established public acquisition overlay) for open space as part of the Chain of Parks plan for some time and would contribute to an important and much needed network of open space for the region. The regional plan must make it clear that the entire allocation of land for the Chain of Parks covered via well-established PAO’s will be delivered.

In relation to Direction 20 – ‘Create a legacy of great civic places’, it is considered that there is scope to include a strategy here to ensure that the opportunity to provide a well-designed and utilised civic space at the Cheltenham SRL station site is maximised. This is a significant state government project in the Kingston LGA that has the capacity to incorporate civic spaces that add great value to the project and its location within a higher order activity centre that is expected to accommodate substantial change and growth in the coming years. Council has completed some ‘well advanced’ thinking around the opportunities in this precinct and would welcome the opportunity of building these ideas into the first Southern Metro Landuse Framework Plan to reinforce highly important regional planning.

## **Chapter 08 – Strong communities**

The identification of the Holmesglen Private Hospital and Holmesglen Institute of TAFE in Moorabbin as a regionally significant health and education precinct is supported, along with strategies to strengthen this precinct through the location of ancillary uses.

## **Chapter 09 – Sustainability and resilience**

Council supports the intention of Direction 26 to increase the retention and reuse of water in the urban environment, and its supporting strategies. We would encourage DELWP to consider more strengthened language, particularly for strategies 87 and 88 to ‘require’ rather than ‘encourage’ these land use and development outcomes. This could be further strengthened with a target for pollution loads entering the bay and creeks.

In relation to Direction 27 – ‘Respond to the transformation of the energy supply network’, we consider this should be more proactive rather than ‘responding’ to the transformation of the energy supply network, this should be to lead and/or guide transformation. We would like to see an additional strategy here that speaks to proactively eliminating the use of natural gas in all new developments and potentially phasing out gas in existing developments.

Council is supportive of Direction 29 – ‘Increase the network of cool places, particularly in areas with communities vulnerable to urban heat and areas with high urban heat’ and note its work in developing and adopting an Urban Cooling Strategy in 2020. It appears in strategy 94 that Frankston metropolitan activity centre may have been overlooked and should be included.

Council also strongly supports Direction 30 – ‘Increase urban tree canopy across the Southern Metro Region to achieve 30 per cent coverage by 2050’ and would encourage greater emphasis on mechanisms to protect existing trees, given that the majority of the existing canopy is currently on private land. Protecting against further loss of existing trees should be a priority in this space. Council would also encourage consideration of strategies to be included for areas of substantial change as it is possible to include trees on these development sites, as well as other green infrastructure. We would also encourage targeted strategies for industrial and large format commercial land uses and development which can be a particular challenge for green infrastructure and treed outcomes.

There appears to be a gap in this chapter regarding opportunities to embed Circular Economy principles, as this is a key resilience theme for the industrial sector, and we would encourage DELWP to explore opportunities in this space.

### **General comments and corrections**

The clarity of some of the mapping, particularly in more densely populated areas where there is a concentration of icons is difficult to read and some of the detail is lost. The Highett Gasworks 'urban renewal' icon appears to be located in Mentone. It would be helpful to also have LGA specific maps which would improve their legibility.

Table 7 on page 47 incorrectly identifies Highett Gasworks as being located within both Cheltenham Major activity centre and the Bayside LGA. Highett Gasworks is within Kingston LGA, located in Highett, separated from the Cheltenham MAC by Southland Shopping Centre.

Table 7 in reference to Cheltenham-Southland MAC refers to it having the 'Cheltenham Station' – this station is known as the 'Southland Station'.

Parkdale is nominated as a 'housing investigation area' but this designation is missing from maps. We note specifically Councils view that Neighbourhood Activity Centres are the 'appropriate' definition for such locations.

On Map 7 it is difficult to ascertain whether the Edithvale-Seaford Wetlands are accurately defined, these wetlands are made up of two water bodies, with the northern section in Kingston LGA which doesn't have a notation on this map.

Clarification is required on page 115 in relation to which golf courses are understood to be located in the Southern Metro region.

Finally, it is critical that the Local Governments of the Southern Area play a key role in the following:

1. Being provided access to, and reviewing all submissions received given the relevance they have to land use planning at a Local Government Area level.
2. The final versions of the Southern Metro Land Use Framework Plan that respond to the feedback received in submissions (as appropriate) are settled through resolutions of each of the Local Governments of the Region through Council resolution.

This has been an important and agreed approach for a range of regional undertakings in areas as diverse as strategic planning for integrated water management, transport planning priorities, affordable housing and economic development. Such an approach is critical to ensure that the 'delivery' of the outcomes in the plan have shared ownership between the different levels of Government and across the region.

3. The manner in which the Southern Metro Land Use Framework Plans are given 'statutory expression' in the Victorian Planning Policy Framework are agreed by the Councils that incorporate the Southern region prior to any Planning Scheme Amendment being proposed.

Should you have any queries regarding this submission, please feel free to contact Rita Astill, Team Leader Strategic Planning on 9581 4794.

Yours sincerely

**Cr Steve Staikos**

MAYOR