

**Submission  
No 3**

**INQUIRY INTO THE PROTECTIONS WITHIN THE VICTORIAN  
PLANNING FRAMEWORK**

**Name:** Name withheld

**Date Received:** 16 November 2021

Name  
withheld

## Inquiry into the protections within the Victorian Planning Framework

**Organisation Name:**  
**Your position or role:**

### YOUR SUBMISSION

#### Submission:

Thank you for taking the time to receive submissions. I will separate my points in dot points:

- The exemption in the Planning Scheme from requiring a planning permit for DHHS housing needs review as the way it is written allows for 'ex-offender' housing without a planning permit or any community notice. I believe that this was not the intention of the exemption, and now creates an unfair situation whereby adjoining land owners have no right to appeal their new neighbours being there. In particular - these houses can go anywhere - near parks, schools, families, etc. This poses a risk.
- Social and affordable housing policy- a covid directive. This directs councils to identify excess council land located close to amenities that could be sold and used to develop affordable housing. Whilst these locations are close to town and in theory worth more at market given that great location- by selling these properties cheaply, they provide a short term solution but long term pain. Council is being rushed, and these properties have been in their possession for a reason and deserve long term strategic planning to determine the best use of them- random vacant lots in established areas could be used for parks and recreation. Council will run out of land eventually, and be forced to buy land at market value- ultimately having to pass on that cost to ratepayers/taxpayers. AKA, long term pain. Its a very short sighted project.
- Residential schedules based on a sliding scale of density, along with state policy supporting greater density near town centres and public transport deserves review. Town Planners helped 'plan' the way out of a previous pandemic (this was in Europe, can't remember how long ago, but a while back), and the way they achieved this was through low density development. Space, private open space, increased garden area requirements. These all contribute to improving health and not spreading disease. Just look at how apartments air systems manage to spread covid. While the great Australian spread of suburban land isn't sustainable and can't keep happening, another solution needs to occur. Smaller homes with bigger outside areas, state standard and enforceable green based urban design guidelines, balanced against bushfire considerations, need to be added to state policy so that smart solutions such as planting of trees (air quality), reduction of road/path materials that increase the 'urban heat effect' happen- so that our new estates in the outer areas of melbourne are of a higher standard.
- Clause 52 and Clause 55 referrals both allow the referral authority to take a responsible authority to VCAT should council proceed with a planning permit decision which goes against their recommendation. This is a technicality - so why are there two types of referral authorities if they both ultimately have the same power/right to appeal at VCAT.
- Housing affordability is a complex topic and one that can't be solved just by planning. The Reserve Bank, the big banks, real estate agents and greedy sellers are all responsible for the massive inflation of land value seen during the pandemic. Supply of land, particularly in regional areas has been limited given the demand seen from people escaping metro areas and covid hotspots. Something must be done to ensure that the market doesn't collapse and people default on huge loans should interest rates increase, as that will have a flow on effect to homelessness. So the Government must intervene and keep interest rates steady for the foreseeable future. Housing affordability is being addressed by the government directive to local government to review council owned land that can be sold cheaply to provide public/affordable housing. Perhaps policy can be added to Planning Schemes that require new estates to provide a certain number of housing for smaller households, given regional areas have stock of family homes for rent, but less smaller options for single renters, or couples.
- For Planning Scheme Amendments, review needs to occur as to what we consider a 'submission' during the exhibition stage. In theory, currently anyone could write in and even if it said 'I hate this amendment',

council has to consider it a submission, and worse, if the submitter doesn't want to withdraw their objection, then an independent Planning Panel must occur, bringing with it a large cost that council must pay. Requirements that submissions must be related to the amendment policy change, a correction to an error, or something similar would be an improvement. And guidance on consideration of the submissions that come whereby a landowner wants their land rezoned for development potential and economic benefit would assist, as these will only increase in time, and again, cost council money at a planning panel, when they are often linked to land owner greed, and not a good planning outcome.

## **FILE ATTACHMENTS**

**File1:**

**File2:**

**File3:**

**Signature:**

