



City of  
**KINGSTON**

17 December 2015

The Hon Richard Wynne  
Minister for Planning  
GPO Box 2392  
MELBOURNE VIC 3001

Dear Minister

**Re: Submission to the Plan Melbourne Refresh Discussion Paper**

Kingston City Council (the Council) welcomes the opportunity to make a submission to the Plan Melbourne Refresh Discussion Paper.

The municipality of Kingston has significant land use diversity through a range of assets and attributes which include regionally significant Industrial areas, the Moorabbin Airport, the northern part of the South East Green Wedge, an extended interface with Port Phillip Bay, a high proportion of 'higher order Activity Centres', RAMSAR listed wetlands, urban renewal sites of potentially metropolitan significance, planned strategic investment by two AFL football clubs and the municipality with the most planned level crossing removals. Based on these features it will continue to play a key role in implementing metropolitan planning objectives.

The following feedback focuses on matters most relevant to the City of Kingston:

**Population growth and housing change:**

- Council supports the wider principles of balancing growth in Melbourne between established and growth areas. Kingston, in recent years, has undertaken significant work with regard to housing, particularly in relation to understanding the capacity of its strategic sites, activity centres and residential areas. This work has led to amendments that have sought to identify areas with development potential in transport rich areas. Recent work in Moorabbin and Cheltenham has shown an increase in development approvals in line with structure plan objectives aimed at diversifying these centres and incorporating new forms of housing with immediate access to services and public transport.
- At a macro level Council believes the establishment of the Victorian Planning Authority will play a key role in determining the distribution of population between the metropolitan area and throughout key regional parts of Victoria. Opportunities to strengthen the distribution of the envisaged population for Victoria into key regional areas is vital in order to appropriately balance the demands that will be placed on Melbourne in order to maintain the metropolitan areas liveability and also enhance economic sustainability of regional areas.
- Council acknowledges the importance of housing targets for metropolitan Melbourne and each sub-region relating to housing diversity, supply and affordability (options 37A and 37B). What is however critical is to recognise the primary role of Local Government in determining how targets will be met and allowing Local Government to employ the tools (zones) it wishes to use to meet the targets.
- Council supports greyfield renewal in appropriate locations. Whilst this concept may be relatively new and untested, recent development within specific areas in Kingston like the Cheltenham, Highett, Moorabbin and Clayton South areas has seen single dwellings at the end of their life redeveloped through a range of forms. This form of development has helped deliver medium to high scale infill development, whilst helping to maintain and protect surrounding established single dwelling residential areas. It is necessary to ensure that in identifying 'greyfield' areas consideration is given to identifying these areas across the life of Plan Melbourne (eg out to 2050) and ensuring that decisions made over the initial 5 year life of the strategy designate areas that have genuine 'greyfield' characteristics otherwise the intent of greyfield renewal will not occur in an appropriately planned manner. A 'pipeline' of greyfield renewal areas that takes a 30+ year perspective may be a good means in which to introduce this objective throughout Melbourne.

- It is Council's view that there would be significant benefit associated with a coordinated and sustained State Government campaign to educate and inform the population of Melbourne as to the housing and population growth opportunities and needs identified through Plan Melbourne. Any such campaign should be underpinned by the key message and underlying principle that all municipalities are required to accommodate a share of this projected population growth. The metropolitan wide experience of the Reformed Residential Zones Standing Advisory Committee Process in 2014 served to highlight the fact that most Council's across middle and inner Melbourne face similar challenges in relation to community perceptions of housing growth, change and diversity. In this regard, it is not the sole responsibility of Local Government to undertake such a task and it is considered that such a campaign, if undertaken at the metropolitan level, would assist in reducing much of the community angst, confusion and at times anger associated with this issue. A well-resourced campaign such as 'Target 155' across a range of media is critical to the successful implementation of Plan Melbourne.
- It is important that the State Government, through its work on Plan Melbourne refresh and the current infrastructure contributions reforms, develops a clear and equitable process by which to allocate and collect infrastructure funding contributions in established areas. This issue is of particular relevance in relation to strategic planning work currently being undertaken by the Metropolitan Planning Authority within the Monash National Employment Cluster. In this regard it is Council's view that a coordinated approach across municipal boundaries and involving all relevant State Government Departments and agencies is the only way to ensure requisite State Schools, local infrastructure and services (open space, libraries, early learning centres etc) is sufficiently available to accommodate the projected population increase.

Council is also mindful that the 'Metropolitan Planning Levy' provides a revenue stream to the MPA to fund its strategic planning endeavours. With the extent of ongoing strategic planning work required in areas like Kingston the Council wishes to reinforce the importance of the Planning Fees review as a source of revenue to Local Government to ensure it can sufficiently fund its work to partner the Government on implementing Plan Melbourne.

#### **Application of the new residential zones:**

- As outlined in Council's submission to the Reformed Residential Zones Standing Advisory Committee (RZSAC) in 2014, it is the culmination of all zones and their application that provides for housing diversity. Whilst a clear set of criteria and actions for the application of the Neighbourhood Residential Zone (NRZ) is supported (option 40), there is also a need for the State Government to establish similar actions with respect to the application of the General Residential Zone (GRZ), which together will continue to provide greater housing diversity across a middle ring municipality like Kingston in addition to other available zones.
- It is Council's view that changes need to be made to the header provisions of the Neighbourhood Residential Zone to ensure that it can have practical application across a broader range of circumstances. These include enhancements to the way in which the zone's purpose is interpreted, a lot size based density standard (eg 1:300m<sup>2</sup>) which Council's significant research shows will maintain housing supply and the application of a mandatory height setting that also takes into account the Special Building Overlay or Land Subject to Inundation Overlay. These aspects should be given very careful consideration as part of the code assess discussion raised through the Plan Melbourne refresh as these elements provide a high degree of certainty to local communities.
- With regard to the application of the Residential Growth Zone (RGZ) it is critical not to simply examine how much land is in the RGZ but the likely redevelopment capacity of the land to achieve the zone's purpose. Council illustrated to the RZSAC that its application of the RGZ on a single strategic redevelopment site underpinned by a structure plan would yield substantially more housing than broader application of the RGZ in suburban locations where significant community concern acts as a barrier to development of 'up to and including four stories'.
- In reviewing and applying the reformed residential zones, it is critical that the State Government gives consideration to the role of all zones which accommodate housing and not just the Neighbourhood Residential, General Residential and Residential Growth Zone. Across the City of Kingston the vast majority of residential growth will be accommodated within activity centres and strategic redevelopment sites contained within non-residential zones such as the Activity Centre Zone, Commercial 1 Zone and/or

Comprehensive Development Zone. This comment builds on those made earlier about allowing Local Government to determine how it works with its local community to meet any prescribed housing targets.

- It is Council's view that existing strategic work and structure plans that underpin the zone and overlay controls applicable to strategic sites and activity centres should be respected by the State Government. It is important that any departure from the existing planning provisions is strategically justified and goes through a detailed planning process and consultation period. This issue is particularly relevant to sites such as the Highett Gas Works which have been flagged for potential referral through the State Government Land Standing Advisory Committee process. In circumstances such as this a collaborative process should be established, whereby Council works with the relevant State Government Agency and the community, whilst maintaining its role as the Planning Authority.

#### **Affordable housing:**

- Council supports the options for strengthening housing affordability as a choice and key concept in Plan Melbourne 2016 (Options 45A, 45B and 45C). The current housing market trends, together with a lack of clear definition or policy direction within the Victoria Planning Provisions, provides challenging circumstances within which to require, facilitate and increase social and affordable housing stock. Council supports the opportunity presented through Plan Melbourne to provide a much greater focus in this area. With a significant range of social support services contained within and proximate to our municipality and an employment profile that relies on key workers this matter is of critical importance to the social and economic wellbeing of our municipality.
- It is Council's view that redundant or surplus government land should be considered as an opportunity towards achieving this action. The former Gas and Fuel site in Highett within the City of Kingston for example, is an ideal site to provide a range of housing opportunities
- Council supports the view of the Ministerial Advisory Committee (Recommendation 25) in suggesting that urban renewal precincts, strategic sites and/or sites requiring a rezoning provide the best opportunity to facilitate and negotiate provision of affordable housing. In this regard, the development of a broader metropolitan Housing Strategy underpinned by statutory tools such as inclusionary and/or incentive zoning would assist Council in its negotiations with developers and landowners.

#### **Role and function of National Employment Clusters**

- Council considers that there is some merit in the proposed development of new planning scheme tools for National Employment Clusters (options 58A and 58B), particularly as a means of ensuring the employment and innovation intentions for the clusters are realised. It is seen as impractical to attempt to create a single planning scheme control applicable to all National Employment Clusters, mindful of the significant differences associated with each clusters role, function and context a more flexible tool to reinforce the key roles of each cluster will be beneficial.
- Council emphasises the need for a balanced approach to employment generation within the Monash NEC that not only focuses on the core knowledge and innovation institutions and businesses, but also on what role the existing and emerging areas like the manufacturing and best practice resource recovery sectors could play in furthering the competitive strength of the Monash National Employment Cluster (NEC) (Options 21A and 21B).
- It is Council's view that the southern boundary of the Monash NEC needs to be revised to exclude areas outside the Urban Growth Boundary currently located within the Kingston Green Wedge. These areas are not intended for employment generation and were recently rezoned to Green Wedge A Zone via the Minister for Planning's approval of Amendment C143.

- Building on the previous point opportunities exist to further investigate the extent to which infrastructure and open space contributions associated with development proposed within the Monash NEC could be used to assist in realising Council's vision for the establishment of the Chain of Parks concept. Mindful of limitations around the ability to provide new open spaces within an established urban and industrial precinct such as the Monash NEC, it is Council's view that the Kingston Green Wedge and specifically, land earmarked for the Chain of Parks, represents a prime opportunity to secure a regional open space network accessible by future residents and employees within the Monash NEC.
- Council is not supportive of the MPA or Minister for Planning instigating any Planning Scheme Amendments that would bring about changes to the Kingston Planning Scheme. Council is best placed to work with its community, to undertake any Planning Scheme Amendments to facilitate redevelopment opportunities within its municipality. This includes any future Amendment required to rezone the Clayton Business Park site.
- It is Council's view that any future rezoning of land within the cluster should not be a precursor to the preparation of a framework plan for the cluster and, where necessary, site or precinct scale master plans. Best practice urban planning requires that the strategic basis for the amendment be understood before the appropriate zone is determined. This would require Council review of the requisite technical reports and opportunity for Council to provide feedback to inform site and precinct level objectives and principles.

### **The Kingston Green Wedge**

- Council believes that whilst retaining the Green Wedge Zone assists in protecting existing agriculture within the Kingston Green Wedge, there is lack of clarity in terms of the industry's longer term viability in our municipality. The Kingston Green Wedge is home to about 74 ha of actively farmed land, post Dingley Arterial land acquisition, and its strategic importance is not in the scale of areas such as Werribee and the Bunyip Food bowl. Further clarity in regards to mechanisms to address the longer term viability of smaller agricultural areas close to established urban areas is needed (options 8 and 31) and this must be assessed against the ongoing viability of existing operators and the competing uses for Green Wedge land. In October 2015 Kingston welcomed the news that the Minister for Planning had approved Amendment C143. The amendment has rezoned land outside of the urban growth boundary, north of Kingston and Heatherton Roads, from a Special Use Zone that facilitates waste related activities to a Green Wedge A Zone. It is a key part of Council's plan for the Green Wedge which includes:
  - Seeing an end to the waste industry in the Green Wedge by prohibiting new landfill and waste recovery operations from opening; and
  - Ensuring former landfill sites are rehabilitated and ultimately turned into public parkland for the Chain of Parks.

Approval of Amendment C143 embeds a strategic direction that enshrines work done over a period of 20 years to develop a 'Chain of Parks that will connect Karkarook Park to Braeside Park across the Kingston Green Wedge. The State Government is the lead agency in funding and facilitating acquisition of land required to implement Council's vision for the Chain of Parks. In this regard, and mindful of the regional significance of the proposed open space outcome, it is Council's view that the Plan Melbourne refresh process represents a critical opportunity to embed clear policy support for the Chain of Parks project within the updated version of Plan Melbourne. As the population increases through middle Melbourne it is critical that the Metropolitan Plan equally balances the need to facilitate the containment and consolidation of urban areas with the open spaces needs of a more significant population. The Chain of Parks is a project of regional significance and warrants this reinforcement and an appropriate funding stream.

### **Transport, freight and logistics:**

- Council supports the 20 minute neighbourhood concept based on the benefits derivable (option 10). In undertaking its structure plans for Moorabbin, Highett, Cheltenham, Mentone and Mordialloc, Council sought to understand its walkable catchment by undertaking surveys of its rail commuters. This work reinforced the opportunity the 20 minute neighbourhood concept presents.

- Council is keen to be involved and to have the opportunity to work with the State Government on Section 4.1 – Updating Transport Commitments which consider the provision of training airports in Melbourne’s green wedges and the role of secondary airports including the Moorabbin Airport.
- Council supports the need for decisions around future transport projects and their timing to be made in a transparent and informed manner particularly the planning for a future seaport(s) for Melbourne. Kingston is one of Victoria’s major employment centres with approximately 66,500 jobs within the municipality. Kingston’s industrial sector is one of the largest and most concentrated in the state. The manufacturing sector is the largest employer, with 17,300 jobs (26 percent), followed by retail trade with 8,400 jobs (12.7 per cent) and wholesale trade with 7,000 jobs (10.5 per cent) making these three sectors vital to the economic wellbeing of the Kingston community and its neighbouring municipalities. Each of these sectors, particularly manufacturing and wholesale trade, relies heavily on the import and export of goods.
- Council understands that the question of the development of a second container port for Victoria will be referred to Infrastructure Victoria. Council is of the view that the Bay West option could have a significant impact on the investment decisions for companies located in the south and east of Melbourne. For an established municipality like Kingston, a further concern with the Bay West option is the potential impact of increased freight traffic on the safety and amenity of the local community and increased congestion on the many arterial roads that traverse Kingston. Melbourne’s South East is a major base for logistics and warehousing. Local businesses have small container requirements that currently use Beach Road as a route to the Port of Melbourne. There is pressure on Port Phillip and Bayside Councils to restrict truck access on Beach Rd in the near future which will compound issues for road freight routes to the Port of Melbourne.
- Council is concerned that Plan Melbourne did not identify the areas of Moorabbin, Moorabbin Airport, Heatherton, Braeside and Clayton South as ‘State significant industrial precincts’ given the key role they play in the manufacturing output of the State of Victoria this areas must be designated as features of the Southern Subregion. We would request that the ‘refresh’ address this.
- Kingston has long campaigned for the removal of level crossings at key locations where structure planning and accident data provides a significant basis to do so. Kingston has twenty two (22) at-grade road / rail crossings out of which seven (7) are on the State Government’s list of fifty (50) to be removed in the next few years. These locations would benefit from the removal of level crossings thereby providing safer road and rail conditions and ease heavily congested traffic during peak periods in particular. Kingston sees opportunities for value capture being built into the these level crossing removal projects to develop ways of using commercial and development rights to generate revenue that contributes to project funding and welcomes any opportunity to be part of the ongoing discussion. This work also provides significant opportunities to generate new strategic recreational linkages throughout the municipality and connect into the broader metropolitan trail network (eg the Bay Trail).
- Plan Melbourne Refresh presents an opportunity to identify regionally significant opportunities for future nodal park and ride infrastructure. It is Council’s view that the work being undertaken by the Level Crossing Removal Authority in relation to the Kingston Seven will also assist in identifying key park and ride locations along the Frankston line. The scale of infrastructure investment proposed and potential value capture opportunities present a significant opportunity to address this issue. It is noted that Council’s Structure Planning work has already identified opportunities in Mentone and Cheltenham Activity Centres with further work required to investigate opportunities at Carrum and Westall stations.

Council appreciates the opportunity to make a submission to the Plan Melbourne refresh discussion paper. We look forward to a collaborative partnership with the State Government to share responsibilities and achieve key actions of Plan Melbourne 2016.

If you wish to discuss the above further do not hesitate to please contact Jonathan Guttman General Manager Planning and Development on (03) 9581 4708.

Yours sincerely

**John Nevins**  
CHIEF EXECUTIVE OFFICER