

Suburban Rail Loop Draft Structure Plans and Planning Scheme Amendments

Council Submission

May 2025

1. General Issues.....	3
2. Implementation Plan and Funding	6
3. Planning Scheme Amendment.....	8
4. Traffic, Transport and Parking	14
5. Community Infrastructure	19
6. Open Space.....	22
7. Recreation.....	24
8. Urban Design and Built Form	26
9. Public Realm and Street Typology	30
10. Canopy Coverage and Urban Greening.....	33
11. Sustainability.....	35
12. Integrated Water Management.....	37
13. Economy	39
14. Amenity Impacts	42
15. Utilities.....	44
Appendix – Recommendations and Key Issues Summary	45

1. General Issues

The City of Kingston appreciates the opportunity to provide feedback on the Draft SRL Structure Plans and Planning Scheme Amendments (PSAs). Council appreciates the benefits of the SRL project and the appropriateness of capitalising on the future transport hubs through precinct planning.

Council has consistently sought to be a constructive and positive participant in any opportunity to provide input into Precinct Planning leading up to the Exhibition period, through formal avenues such as its submissions to the Precincts Discussion Paper, Draft Visions and Key Directions, as well as meetings with SRLA representatives since late 2022.

Council's collaborative approach to engaging with the Suburban Rail Loop project was articulated from the outset in August 2020, through its statement 'Working Together'. The experience of an authority other than Council assuming responsibility for strategic planning in its municipality on this scale is unfamiliar to Council, however its absolute priority has been working within the established process to ensure that the precinct planning deliver the best outcomes for its current and future Cheltenham and Clayton communities.

Council acknowledges the vast technical assessments that have informed the preparation of the draft structure plans and PSAs but has a range of outstanding concerns. This submission outlines the issues of importance to Kingston, being those issues it sees as requiring addressing ahead of finalisation of the Structure Plans and PSAs and which are summarised within this submission. Council would welcome any opportunities to progress discussions with SRLA on issues raised in its submission in the intervening period between Exhibition and the IAC Hearing.

Though Council acknowledges the amount of work that has underpinned the proposals, it regrets the limited time within which it and its community has had to absorb and respond to it. Repeated requests for access to the technical reports had been made prior to the exhibition period. Whilst Council would have benefited from accessing the detail within the Exhibited documentation earlier, its various departments have collectively informed this submission. The limited time within which Council has had to absorb a vast quantity of technical information has meant that issues are identified at a high level. Council intends to further expand upon and substantiate its concerns at the Independent Advisory Committee appointed to consider the plans and submissions received scheduled for September-December this year.

A key impediment to Council's confidence in the materials is the omission of demographic profiles. The SRLA have not provided a breakdown of demographic data cited in the Business and Investment Case and SRL Precinct Planning Guidelines, despite Council's several requests, including through each of its formal submissions to published material since October 2023. Demographic profiles play an integral role in future planning for community infrastructure and the lack of this information creates a significant gap. Without a clear understanding of the data utilised to underpin the headline figures, the Council is unable to provide accurate and informed feedback on future requirements, including housing needs, community infrastructure/facilities and open space to service the growing populations. Furthermore, whilst appreciating the Structure Planning focuses on the delivery of infrastructure to 2041, given the competition for space within a denser urban environment, we think it prudent to consider the 2056 population projections.

The SLRA-led precinct planning is one of several significant state-run projects within the area. At a broader precinct level, it is important to recognise the future interplay between the SRLA precinct planning work and other state-run projects including:

- The Activity Centre Program in Moorabbin (Victorian Planning Authority and Department of Transport and Planning). The boundary of the Moorabbin Activity Centre overlaps with the Suburban Rail Loop Authority 1600m precinct boundary.
- The Former Gasworks site redevelopment (Development Victoria), and
- The Level Crossing Removal Project at Highett Road and Wickham Road.

It is critical SRLA engages with these other authorities active in this corridor to ensure an integrated approach – the best planning will happen by looking at this area holistically.

Of most direct consequence is the Highett Level Crossing Removal Project. The State Government has committed to the removal of the level crossings at Highett and Wickham Road by 2029 with an elevated rail solution and proposed new station. This project will significantly change the urban form along the railway line. In anticipation of the SRL plans and in the absence of any further announcements or designs for the LX project, Kingston developed some early design concepts for the future level crossing removal that it would like to see included in the precinct planning work. It includes ideas in relation to aspects such as how the elevated rail will sit in the landscape and new urban form, opportunities for new open space and community infrastructure below the rail, transport and connectivity improvements and landscaping and public realm upgrades. The Urban Design Report has been provided to SRLA and should be considered in unison with the draft structure plans.

Additionally, the proposed Planning Scheme Amendments may trigger Windfall Gains Tax liabilities for Council, where any Council-owned sites may be rezoned to zones other than Public Land Zones. This financial impact has not been addressed in the Implementation Plan, and Council would seek clarity on how these implications will be managed, particularly where it could affect Council's capacity to deliver community-benefitting projects.

Whilst effort has been made to capture and refer to many Council policies, some have not been acknowledged. Each Council policy represents years of expert-led background work to determine the most appropriate positions that truly reflect our community's aspirations. Whilst Council acknowledges the transformative aims of precinct planning, the precincts do not sit in isolation of the local context. Whilst some consistency in approach across the line is appropriate, it is vital that the following further key strategies are referenced:

- Council Plan
- Economic Development Strategy
- Kingston Employment and Commercial Land Use Strategy
- Property Strategy
- Council's Walking and Cycling Plan
- Public Toilet Strategy
- Play Your Way Strategy
- Climate and Ecological Emergency Response Plan
- All Abilities Action Plan
- Municipal Public health & Wellbeing Plan
- Library Strategy

- Sports and Recreation Strategy
- Updated Kingston Biodiversity Strategy 2024
- Kingston Street and Park Tree Management Strategy (under review)
- Urban Forest Strategy
- Integrated Water Strategy and Story
- Kingston's draft concept plan (2024) showing an alignment for extending the Dingley Recycled Water Scheme's pipeline from Weatherall Rd into the Cheltenham Structure Plan area.
- Kingston's Stormwater quality in-lieu Developer Contribution Scheme.
- Cheltenham SRL Design Advocacy Document presented through EES.

Summary/Recommendations

- Council will continue to be a constructive participant in the precinct planning process and welcomes opportunities to work with SRLA to resolve issues with drafted material ahead of and during the IAC Hearing.
- A detailed breakdown of the demographic profiles must be provided without delay.
- Further precinct coordination on projects such as Highett Level Crossing Removal Project and the Activity Centre Program Implemented at Moorabbin is required.
- Clarify the financial implications of the Planning Scheme Amendments in relation to Windfall Gains Tax, and how these impacts will be managed through the Implementation Plan.
- A significant number of Council policies and documents have not been considered and need to be included.

2. Implementation Plan and Funding

A key SRL program objective is to facilitate the timely delivery of non-rail related infrastructure. An increased population within the Structure Plan boundary will require significant investment in the delivery of open space, community facilities, public transport, walking and cycling networks and upgrades to roads, drainage infrastructure and utilities.

The draft implementation plans for each precinct are critical to ensuring that the aspirations of the Structure Plans are realised. They include actions that necessitate changes to the Kingston Planning Scheme, non-statutory actions and a range of key projects. Each action is assigned a timeframe, 'implementation pathway' and an authority responsible for its delivery.

Of utmost concern to Council is that it has been identified as being responsible for the delivery of significant projects with no indication of how they will be funded. Council understands from meetings with SRLA that future development contributions are subject to ongoing discussions by the State government with industry and other stakeholders. SRLA have indicated that developer contributions in the precinct would be dependent on the direction of the State-wide framework. An action within the new Plan for Victoria is to 'streamline community infrastructure developer contributions' but there is no timeframe attached. We don't yet understand how the timing of the state-wide implementation may align with the expected gazettal of the SRL PSAs in 2026, however it is imperative that there is no intervening time whereby land within the Structure Plan areas is not bound to contributions as this would result in unfair outcomes, with early development not appropriately contributing to the public infrastructure needed within the precinct. There is currently no development contributions plan overlay in the Kingston Planning Scheme, and the new infrastructure that will be required for the increased population in Clayton and Cheltenham is on top of any new infrastructure that may be required to service the increased population facilitated in the Moorabbin activity centre by Amendment GC252 (which also omitted introducing any developer contributions).

Furthermore, Council is concerned about infrastructure lagging growth and would advocate for early delivery of critical facilities to prevent strain on existing resources.

It is also noted that the Department of Transport and Planning (DTP) released a new Ministerial Direction on Infrastructures Contribution Plans (ICPs) in late April 2025, which will initially apply only to the ten pilot Activity Centres in the Victorian Activity Centre Program. The Direction does not provide any clarity or pathway for how infrastructure within SRL precincts will be funded, leaving a critical implementation gap in the delivery of the SRL precincts. It is necessary to clarify whether the ICP is intended to be applied to the SRL precincts.

This vital component must be considered through this process and addressed before the gazettal of the SRL East Amendments.

The reliance on 'partnerships' to deliver without a clear definition of what that means in practice needs to be resolved to ensure successful working relationships and smooth delivery of important projects. The implementation plan assigns a 'partnership' arrangement to the delivery of some projects, usually between Council and SRLA, with no indication of how this would look. This lack of direction presents risks in delivering the vision as it rests on uncertain factors such as funding, change of government and state department restructures.

The increased community infrastructure demand and significant investment into modal shift and public realm amenity are far beyond those envisaged within Council's current plans. Within a financially constrained and rate capped environment, and without certainty of an adequate funding mechanism, Council does not have the resource capacity to lead the delivery of the Structure Plans actions.

The projects and actions from the Structure Plan represent potentially millions of dollars in capital investment beyond Councils current forward financial and capital plans. We seek certainty and clarity on a funding and implementation pathway, relevant roles and responsibilities to achieve planning, design and delivery of projects such as the following:

- New and improved open spaces.
- New and improved community facilities.
- Optimisation of existing facilities.
- The proposed network of public realm linkages and streetscape masterplans associated with new street types.
- Road network improvements including Bay Road and Highett Road.
- New and improved active transport infrastructure for a safe and legible network.
- IWM measures such as those required by development proposals and along roads.
- Undergrounding of overhead electrical infrastructure to achieve public realm improvements.
- Utility upgrades.
- Nature based offsets.
- Green infrastructure to achieve canopy targets, biodiversity and amenity.
- New water bodies in open spaces.
- Partnerships for a decarbonised energy supply.
- Bicycle and Micromobility and end of trip policy and guidelines.

Summary/Recommendations

- Funding of infrastructure must be addressed as part of this process and before any planning scheme amendment to facilitate development is gazetted.
- The new Ministerial Direction on Infrastructure Contributions Plans (ICPs) does not apply to SRL precincts and leaves a critical funding gap that must be addressed as part of this process.
- Delivery of key infrastructure needs to be prioritised to ensure it does not lag growth.
- The 'partnership' arrangement for project delivery proposed by the Implementation Plan needs to be defined.
- Clarity on implementation pathways, in particular, relevant roles and responsibilities for each project.
- The Implementation Plan and funding mechanism must provide confidence that there is no cost shifting/burden to Council and that infrastructure will be delivered in a timely manner to meet the needs of the growing population.

3. Planning Scheme Amendment

The Bayside/Kingston GC246 and Kingston/Monash CGC247 Planning Scheme Amendments (PSAs) give effect to the directions of the Cheltenham and Clayton Structure Plans. Council has a range of concerns with the drafted controls that should be considered thoroughly before their finalisation, to maximise opportunities for the SRL objectives to be realised.

As a general observation, Council is concerned that aspects of the Structure Plans and technical reports appear not to be reflected in the Planning Scheme Amendment. It is not clear why some of the contents of supporting documents are absent from the PSAs provisions. It is imperative that appropriate elements of the Structure Plans and technical reports carry through to the PSAs as none of these other plans/reports are proposed to be incorporated into the planning scheme.

The PSAs implement the new Precinct Zone and Built Form Overlay. Council has concerns about the drafting of the controls which affect workability and may lead to inequitable outcomes. These are listed in more detail below.

Policy

An important issue to be resolved is the lack of direction for Council in mitigating underdevelopment proposals as many of the development objectives and requirements necessitate consolidation. New policy includes strategic directions to avoid underdevelopment of SRL Precincts, consistent with their role as places for substantial future change, however insufficient guidance is provided to help Council identify and refuse underdevelopment applications.

The PSAs include some references to 'SRL precincts' rather than Structure Plan Area. This appears to be going outside of the ambit of this phase of planning. We suggest references to Precinct be to Structure Plan Area instead.

Highett Neighbourhood Activity Centre appears to be proposed to be deleted from the planning scheme and be encompassed in the SRL East Structure Plan Area, although some reference to it is retained in proposed amended clauses 02.03-1 and 02-03-6. The SRL East Structure Plan area is treated like an activity centre but seems to sit outside the activity centre hierarchy. Council suggests defining the SRL East Structure Plan Areas as activity centres so that the status and role of Southland and Highett in the overall activity centre framework is clear.

BFO

Some objectives relating to character seem unfeasible and require rethinking to ensure they are realised. For example, Schedule 4 to the BFO includes design objectives including 'mid-rise development in a 'garden landscape character' and 'encouraging lot consolidation to achieve increased height and good design outcomes including through landscaped side setbacks'. Associated requirements are unlikely to achieve these outcomes e.g. a front setback of 4 metres is insufficient for a canopy tree, and side setbacks at ground level are only contemplated for the rear half of standard sites.

Objectives around development type also require refinement for consistent direction. Some objectives in the BFO4 and BFO6 appear contradictory, for example they may contain an objective about

consolidation but then the maximum height standard allows 11 meters for smaller lots as a deemed to comply standard. This does not give clear guidance to developers about the future built form.

The standards of the BFO relating to the provision of public laneways are problematic and unlikely to be workable as pedestrian connections nominated through private land. It's not clear as to ownership of the laneways, whether they are required to be publicly accessible, and how they can be achieved over multiple titles.

The 4m setbacks with townhouse typology will not allow for a single car space in front of single garage, which may encourage double garages and there is limited control to ensure garages do not dominate the frontage.

Precinct Zone

Council is concerned about a blanket third party exemption from all controls. We propose that a more nuanced approach is considered, potentially whereby review rights are introduced in instances where standards such as building height and Floor Area Ratio are not met.

There is no direction in the zone or schedules to the zone, that guides the type of development that is envisioned i.e. apartments or townhouses. The Structure Plans includes guidance on this, but it is not translated through to the planning scheme.

Exemptions from the need to obtain permits appear to be translated to the Precinct Zone from the applied zones, without appropriate adjustment for context. For example, consideration should be given to whether the exemptions currently provided to single dwellings should be carried into a Precinct Zone focused on encouraging substantial housing growth and discouraging underdevelopment.

Council is concerned about the lack of references to the protection of neighbouring amenity. Clause 55 standards relating to daylight to existing windows, north facing windows, overshadowing and overlooking do not appear to be translated anywhere. If this land is to be developed in a comparable way to the current RGZ internal amenity should be adequate as noted under the objective in the structure plan and clause 55 and 57 need to be included as mandatory requirements.

Some application requirements are unclear, which is of increasing importance given changes to the P&E Act which introduce provisions relating to incomplete permit applications, for example, the application requirement for an independent design review.

Some variations to the zones should be considered for appropriateness, for example Office as a section 1 use within Area 4. Preliminary work informing Council's Employment and Land Use Strategy (ELUS) envisages that smaller-format warehouses/office development typical of a business park would be a more appropriate transition to advanced manufacturing and professional employment to the north, which would be consistent with the trends occurring in the broader area. Whilst office is an appropriate complementary use in this context, applying it as a section 1 use may undermine the outcomes referenced in the ELUS work. Various permit exemptions should also be reviewed including those for emergency services facilities, medical centres and hospitals in 'area 4' on the east side of Chesterville Road, currently zoned Residential Growth Zone. Whilst these uses may be appropriate, nuances of their operation (e.g. Impact on surrounding residential land) need to be considered through a permit application. Further integration should be encouraged between mixed-use developments and existing business precincts in the surroundings such as in Charman Road north. Additionally, only the station

precinct is defined as the 'core'. While this definition is understandable for the purpose of creating a building typology, it has ignored the need to create commercial/mixed-use synergy between the Station 'Centre Core' and the Southland 'Strategic Site'.

In the following sections of this submission, Council suggests that greater specificity is needed on the locations for community facilities and public open space. It is important that proposed new public open space and community facilities locations are designated in the use and development framework plan the Cheltenham and Clayton Precinct Zone schedules to reflect these future land uses.

Master Planning for Strategic Sites

Three strategic sites requiring site-specific master planning are identified in Kingston – Highett Gasworks, the Station environs and Southland Shopping Centre.

Council has a range of concerns with the master planning process including:

- the current public open space requirements for 'strategic redevelopment sites' must apply to these sites and this must be made clear in the controls;
- the decision guidelines do not provide certainty;
- the control is not a transparent tool; and
- how public benefit will work in these instances.

It is noted that no master plan is required for 1400 Centre Road, notwithstanding its designation as a strategic site. It is not clear why some strategic sites require masterplans whilst others do not, and it is Council's view that all nominated strategic sites should be governed by master planning provisions. The introduction of Schedule 5 to the BFO (BFO5) means that DDO24 will be deleted which includes strategies that should be retained. Council has also previously argued against the application of the MUZ to this site when it undertook Amendment C126 (Clayton South Industrial Precinct). The Planning Panel and Minister agreed, approving Residential 1 Zone for this site.

Gasworks Site

It is also noted that a number of important outcomes facilitated in the current DPO7 that apply to the Gas and Fuel site have been lost. These include the road connection from Remington Drive, a shared user path that **aligns** with the rail corridor, and the current 11.6% POS contribution (which is not reflected in the contributions area map in the amended schedule to Clause 53.01). Most concerning is the loss of the up to 10% affordable housing requirement that was imposed by the then Minister for Planning as part of the approval of the DPO7 for the site.

Uplift

The Public Benefit uplift framework allows for development with Floor Area Ratio that exceeds mandatory maximum where public benefit is provided, as set out and calculated in accordance with the Suburban Rail Loop East Voluntary Public Benefit Uplift Framework. We are supportive of the concept of a value capture framework, and the guidance this can provide developers and decision makers where uplift is being sought. The types of community benefits that are being considered on a precinct basis should be determined in consultation with Council to ensure these benefits meet the needs of the local community, are practical and can be delivered.

It is noted that the FAR calculation is deferred to a document outside of the scheme and 'as amended from time to time'. This appears to be non-transparent. The legislative basis for the uplift provision should also be considered, to ensure that it is able to be included in the planning scheme in its current form.

Officers currently work with developers to develop plans that both abide by the development scale stipulated by the scheme, whilst negotiating wider public realm benefits. The uplift scheme should provide for benefits that would not ordinarily be part and parcel of undertaking a development.

Council would benefit from further guidance on what is appropriate to be considered for uplift. The tool is complicated and is a resource burden for Councils especially if external advice as to whether the calculations are correct are required.

We understand Section 173 agreements will be one of the mechanisms used to deliver a community benefit in exchange for a density uplift. We would like to see details of a proposed framework for the documentation and management of these agreements and their obligations.

Interaction of the Precinct Zone and Other Particular Provisions

Council seeks to understand the interaction between the uplift mechanism in the Precinct Zone and the newly introduced Clause 53.25 (Great Design Fast Track) which provides incentives for 'great design'. Under the Great Design Fast Track, the Minister for Planning can waive height, setbacks and other requirements. Under the Precinct Zone, uplift can be obtained for the delivery of community benefits outlined in the Public Benefit Framework.

Council queries whether there is a duplication of development pathways serving the same purpose and whether a consolidated approach is warranted.

Parking Overlay

A number of measures have not been translated from the technical assessments through to the PSAs. These include:

- The requirement for developers to have Adaptable Parking Plans
- Electric Vehicle Charging facilities
- Design standards for car share

Whilst Council understands the logic in creating different parking requirements for different areas, the division of the parking overlay into areas 'A' and 'B' appears arbitrary and it is unclear how SRLA reached the area A and B classification. It is concerning the Parking Overlay Area A only mandates the maximum number of spaces required rather than the minimum number. The maximum means that no parking may be provided with no consideration for impacts this may create on on-street parking. For Area B, the minimum and maximum approach means some parking is provided for these uses.

Council believes that car-sharing requirements should be implemented into the controls for private developments to encourage car sharing.

The 'unbundling' concept in the PO is not well defined and needs to be clarified. In principle 'unbundling' is a worthy idea, however, it is difficult to see how it would be incentivised in a planning scheme context. The reference to it is in decision guidelines for car parking plans which means it would only be a

consideration for Council in undertaking their assessment, rather than any requirement on the developers' behalf.

The PSAs include an objective around the design of car park area being future proofed to allow future adaption for other uses. It is unclear the mechanism by which future adaptation and repurposing is made.

Application requirements and decision guidelines should be broadened to account for a wider range of vehicles, to enable the responsible authority to take them into consideration when assessing applications, these include motorcycle parking, bicycle parking, end of trip facilities, car share spaces, electric vehicle charging spaces, accessible parking and loading area for residential development. Further to this, design standards for car parking for car share and car charging stations are omitted.

Aviation

Moorabbin Airport is Australia's second busiest airport in terms of flight movements, and it is imperative that future development does not interfere with its function or present risks to safety.

Some areas lack designated airspace planning controls, despite their proximity to flight paths. While Design and Development Overlays regulate building heights, there are gaps in planning control for some areas, for example, Cheltenham. In the absence of greater direction within the Precinct Zone as to the underlying policy purpose of this (i.e. protecting the Moorabbin Airport) and the lack of any third-party rights of notice and review, the effectiveness of the proposed mechanism for obtaining the views of the Moorabbin Airport Corporation (MAC) provided by the Precinct Zone is unclear in the absence of greater direction as to its underlying purpose (i.e. Protection of the Moorabbin Airport). Council seeks to expand the area where the local policy applies to ensure clarity and accountability on this issue. The discretionary nature of height limits creates uncertain impacts. The Aviation Report states that planning permit applications for exceeding heights under the existing controls are generally assessed on a case-by-case basis, rather than being outright prohibited. The report suggests that developers can seek approvals to exceed height limits, creating a loophole that could allow taller structures to interfere with safe flight operations. Council suggests making airspace height limits mandatory, not just guidelines.

The Aviation report identifies that temporary cranes exceeding airspace height limits require approval from Moorabbin Airport and on a case-by-case basis, particularly within PANS-OPS and Obstacle Limitation Surface (OLS) protected zones. Inputs from different bodies (Moorabbin Airport, DITRDCA, CASA, Airservices Australia), are actually required leading to potential delays or inconsistencies. A stricter monitoring and advanced notification system is needed for construction projects using cranes near the airport, ensuring better coordination with airport authorities. Council suggests the creation of a centralised airspace compliance authority to streamline approvals and ensure better enforcement of regulations particularly regarding communication with operators.

Council also proposes that targeted consultation on the PSAs should include major flight schools at Moorabbin not just the MAC as well as Airservices Australia, who are part of the international review into flight paths.

Contaminated Land (EAO)

Environmental Audit Overlays (EAOs) need to be applied to all Potentially contaminated Land (PCL). There are over 300 properties have been identified as Potentially Contaminated Land (PCL), but only a

third of these are proposed to be covered by an Environmental Audit Overlay (EAO). Given the upcoming Victorian Planning Reforms (March 2025) and the need to meet the General Environmental Duty (GED), these properties should have an EAO applied as part of the SRLA Planning Scheme Amendment to ensure appropriate environmental management and risk mitigation. The technical report states that even in the absence of an EAO, planning permit applications in the SRL East Structure Plan Areas will need to consider contaminated land risks under Section 60 of the Planning and Environment Act and Clause 65.01 of the VPP. However, given the high number of PCL sites and the uncertain timelines for their redevelopment, applying EAOs across all identified sites would provide greater clarity, ensure proper environmental due diligence, and allow responsible authorities to effectively discharge their legal duties.

Summary/Recommendations

- Important elements of the Draft Structure Plans and technical reports to be reflected in the Planning Scheme Amendment.
- Clarity on Council's role as Responsible Authority.
- Guidance required for discouraging under development proposals and encouraging lot consolidation.
- Remove inappropriate references to the 'SRL precinct'.
- Clarification on the status of SRL East Structure Plan areas in relation to the Activity Centre Hierarchy.
- Clarify requirements relating to character and development type to ensure they can be achieved.
- Standards of the BFO relating to the provision of public laneways require refinement.
- Controls should discourage garage-dominated street frontage.
- Third-party rights exemption should be tailored to enable a nuanced approach.
- Utilisation of applied zones is inefficient and not 'future proofed'.
- References to the protection of neighbouring amenity need to be instated.
- Some variations to the zones should be considered for appropriateness.
- New public open space or community facilities need to be reflected in the Precinct Zone map.
- Further clarification regarding master planning process.
- Master Plan provisions at Highett Gasworks to retain important requirements of existing DPO.
- Legality issues with uplift provisions to be resolved as part of this process.
- A framework for management of s173 agreements for uplift to be outlined.
- The methodology for the application of areas 'A' and 'B' of the Parking Overlay need to be clearly justified.
- Concerns about the potential implications of the maximum parking requirement.
- Planning controls for development near the airport should be strengthened – suggest making airspace height limits mandatory, not just guidelines and the need for wider airport stakeholder communications.
- Drafting to be reviewed in detail to ensure workability and fairness.
- Apply the EAO to all potentially contaminated land in accordance with best practice and to align with the General Environmental Duty
- Consider how the Precinct Zone interacts with recently introduced particular provisions, such as Clause 53.25.

4. Traffic, Transport and Parking

The introduction of new planning controls and infrastructure changes under the SRL Precinct Structure Plans will precede the operation of the Suburban Rail Loop by up to a decade. Mandatory maximum car parking rates will take effect at gazettal of the planning scheme amendment (earmarked for 2026), significantly reshaping development and travel patterns in the lead-up to station openings. Given this considerable time gap, it is essential that the structure plans and associated management plans provide a realistic and comprehensive strategy for managing transport and parking during the transition period. Council's feedback identifies key concerns with timing, mode shift enablement, infrastructure delivery, and long-term planning assumptions that must be addressed for the strategy to be workable and effective.

Supporting Modal Shift

Achieving a meaningful shift from private car use to more sustainable and active transport modes will require more than planning controls that restrict car parking. It will depend on well-timed delivery of reliable, accessible alternatives and a well-defined, adequately funded strategy for bridging the 10-year gap between the implementation of planning changes and the operation of the SRL.

The documents acknowledge the need to manage this transitional period but lack specific measures. Interim parking strategies are mentioned, but their application, funding, and management are unclear. Encouragement to adapt public consolidated carparks is noted, but mechanisms and implementation strategies are missing. The absence of a defined plan for managing parking during the next decade creates uncertainty and risks unintended impacts on nearby communities.

The strategy to limit car parking provision needs to be carefully managed in tandem with proactive improvements to other modes of transport. While reduced parking aims to reduce car ownership, its success depends heavily on enhanced public transport and active transport options being in place. The current plans do not prioritise these improvements. There is a pressing need to reframe the modal shift strategy so that investment in public and active transport infrastructure is positioned as the foundation, rather than assuming parking reductions alone will achieve behavioural change. These infrastructure improvements, including the broader bus network and the quality of interchange environments, should be in place by the time the SRL stations open.

Active Transport

Council strongly supports improving active transport infrastructure, but significant gaps remain in the plans that limit the effectiveness of this objective. The proposed network of pedestrian and cycling corridors is not comprehensive and in some instances does not align with local knowledge, existing infrastructure, or user needs.

A series of gaps in the pedestrian and cycling networks have been identified. For example, the continued Shared User Path (SUP) connection between Jean Street and Heather Grove is not clearly shown or explained. Likewise, the proposed Bay Road shared path and connections through Karen Street are missing or misaligned. In some locations, such as Jellicoe Street or Enright Street, suggested local cycle corridors appear unviable due to road constraints or a lack of crossings.

Active transport planning must go beyond simply linking people to SRL stations. There needs to be greater attention to local connectivity, particularly where existing community infrastructure and activity centres and employment areas such as the Moorabbin industrial precinct already attract regular movement. Improvements to the cycling and walking environment must also consider inclusivity. While the Structure Plans and PSAs refer to accessibility, they do not adequately address the experience of users with mobility impairments or reference Council's existing accessibility audit, which could be used to inform improvements.

There is also a lack of clarity regarding how micro-mobility infrastructure and mobility hubs will be implemented. The proposed cycle parking hub at Cheltenham Station is welcomed but would be more usable if designed as a broader 'mobility hub', integrating end-of-trip facilities, electric charging, parcel lockers, and other user amenities. Greater detail and clearer commitments are needed to ensure these facilities are appropriately delivered and supported.

Data, Modelling and Analysis

The supporting technical reports make use of a variety of datasets, but there are limitations in how this data has been applied. Some datasets, such as the 2018 mode share data, predate the Covid-19 pandemic and may not accurately reflect current or future travel behaviour. Additionally, trip demand estimates for 2041 appear to be based on average trip volumes rather than worst-case or peak scenarios, which weakens capacity planning reliability.

There is limited transparency around the modelling methodology, particularly regarding the origin of certain assumptions. For example, the use of AM peak data for PM trip patterns is not well explained. It's unclear whether the projected mode shares are grounded in real-world outcomes or based purely on aspirational targets linked to design features. This lack of transparency weakens confidence in the feasibility of the proposed infrastructure and modal targets under the expected development conditions.

Where reference is made to ongoing transport or microsimulation modelling, this work is not provided or summarised in the public documents, thereby limiting Council's ability to assess its relevance and rigour.

Managing Local Streets

The Structure Plans and associated PSAs identify the importance of minimising local traffic impacts and improving pedestrian safety, but they do not assign clear responsibilities for funding arrangements for implementation. For example, while speed reductions and local area traffic management measures are proposed, there is no information on who will lead these works, how the measures will be consulted upon or staged.

Strategies to discourage rat-running and create low-speed safe local environments are supported in principle, but their practical implementation requires meticulous translation into tangible actions. This includes identifying specific location for pedestrian crossings and implementing traffic calming measures. Without this level of detail, there exists a substantial risk that the implementation of these safety upgrades may be delayed, underfunded or ultimately left to the Council's sole responsibility to implement without adequate support.

Parking

The Parking Precinct Plans and associated reports contain a number of inconsistencies and omissions that require attention. In some instances, conclusions appear to contradict the data presented, such as the assertion that car parking is 'not currently managed efficiently' is not consistent with evidence presented elsewhere in the document.

There is also limited discussion of disability access and DDA-compliant spaces, and the bicycle parking rates proposed for employment and education uses are insufficient. EV charging infrastructure is also not specifically addressed, despite its importance to supporting sustainable transport modes into the future.

Council has concerns regarding the proposed kerbside hierarchy and the allocation of responsibilities for implementing precinct parking plans or kerbside access frameworks. Without a clear funding and delivery mechanism, these strategies risk remaining aspirational. There is also a need to clarify the intended scope of the proposed 'Car Parking Reuse Plan' and who will lead and monitor this work.

Cheltenham Precinct

In Cheltenham, freight movement presents a specific concern. The Bay Road bridge, which has a 4.2m clearance, is not acknowledged in the Freight Challenges section of the report. However, this constraint shapes how freight can circulate in the area and has broader implications for road safety and congestion.

The interchange between Southland Station and the new SRL Station also remains a key issue. The current walking distance of 350m does not facilitate seamless interchange, and the decision to defer this matter to the Department of Transport and Planning (DTP) overlooks an opportunity to deliver significant transport benefits as part of this project. Greater clarity is required on whether the Southland Station relocation is being considered and how it will be funded and staged.

Critically, there are gaps within the Shared User Path along the Frankston Line corridor. From an alignment perspective, it is unclear if the path will continue along the corridor or form part of the open space network within the former Highett Gasworks site. From a delivery perspective the section between Southland Station and Heather Grove is in question and we seek this section's delivery to form a specific action. As evidenced in Council's 2021 Design Advocacy and Highett LXRP Urban Design report, we seek for a continuous shared user path to be delivered along the railway corridor forming a broader part of the Frankston to CBD route.

Several street classification inconsistencies are observed in the Cheltenham precinct. For example, Nepean Highway is not designated as a Strategic Walking Corridor despite its clear role as a major movement spine. Reclassifications of Graham Road and Highett Road may also be required to better align with their functional roles and avoid potential confusion regarding implementation.

Clayton Precinct

Centre Road and Clayton Road experience substantial modal conflict. These roads carry heavy traffic, bus routes, freight, and serve as commercial frontages. The lack of safe crossings and poor pedestrian environments creates serious safety and amenity issues. Public realm upgrades and better street management strategies will be needed to address this, particularly in areas expected to accommodate

higher densities. Neither information of who is responsible for delivering these upgrades and strategies nor where the funding will be coming from is clarified in the released documents.

Summary/Recommendations

Supporting Modal Shift

- Provide a clearly staged and funded interim parking and transport strategy to manage the lag in infrastructure (before station operation).
- Ensure key public and active transport infrastructure (e.g. bus interchange, improved pedestrian access, active transport links) is delivered or substantially progressed by station opening.
- Clarify implementation strategy for proposed consolidated carparks and how these support mode shift.
- Improve the interchange experience between the SRL and Metro stations including clarity on the future of Southland Station.

Active Transport

- Address connectivity gaps in the pedestrian and cycling network, in both mapping and implementation plans.
- Strengthen East-West connectivity in Clayton between Meppel Drive to Knight Street, Karen Street to Chesterville Road (Cheltenham).
- Improve integration with local connectivity, not just key links to the new SRL stations.
- Review and revise nominated cycling corridors where they are not feasible or supported by infrastructure.
- Conduct accessibility audits and leverage Council's existing accessibility study.
- Upgrade poor pedestrian environments, including unsafe underpasses and incomplete crossings.
- Provide clarity and delivery plans for micro-mobility infrastructure and mobility hubs and expand functionality beyond cycle parking.
- Increase proposed bicycle parking provision rates, associated requirements and clarify provisions for covered/sheltered parking in high-use areas.

Data, Modelling and Analysis

- Adjust baseline data and travel patterns to account for Covid-19 impacts and post-pandemic behavioural changes.
- Provide transparency on the modelling methodology, including clarification on assumptions for trip distribution, capacity planning, and worst-case scenario testing.
- Clarify whether mode share targets are evidence-based or aspirational, and link modelling outputs to infrastructure recommendations.
- Expand and publish details on microsimulation modelling and how it will inform delivery.

Managing Local Streets

- Clearly identify who will lead, fund, and consult on the implementation of local street changes, including speed limit reductions and safety treatments.
- Specify actions and locations for local area traffic management measures.
- Integrate cost planning and infrastructure responsibilities into the street management strategy to support practical implementation.

Parking

- Clarify inconsistencies between observed parking behaviour and conclusions in the technical reports regarding current management effectiveness.
- Identify responsible authority for the preparation, monitoring and review of the Parking Precinct Plans and Car Parking Reuse Plans.
- Provide guidance on EV charging infrastructure provision in new developments.
- Strengthen requirements for DDA-compliant on-street disability parking.
- Resolve conflicting views on kerbside hierarchy with Council and clearly outline implementation responsibilities for any new frameworks.

Cheltenham Precinct-Specific Issues

- Address the 4.2m clearance constraint with the bridge on Bay Road as a key freight movement issue.
- Reclassify Nepean Highway and other roads in line with their actual strategic significance.
- Delivery of a continued Shared User Path (SUP) connection between Jean Street and Heather Grove is needed.

Clayton Precinct-Specific Issues

- Prioritise public realm upgrades and improved pedestrian environments along Centre Road and Clayton Road.
- Enhance active and public transport connections between SRL, Monash University, Clarinda, and surrounding neighbourhoods.
- Prioritise upgrades to the Knight/Centre Road intersection.
- Resolve the unclear delivery strategy for key East-West and North-South links, such as Meppel Drive, Knight Street and Audsley Street corridors.

5. Community Infrastructure

The Structure Plan and PSAs provide limited certainty around the delivery of critical community infrastructure required to support projected population growth. Given the transformative scale of change and uplift proposed across both precincts, particularly in Cheltenham, early planning and commitment to infrastructure delivery must be addressed more robustly. The PSAs are generally silent on details of community infrastructure and should be amended to facilitate its provision.

A key concern is the absence of recommendations for early childhood services, particularly stand-alone kindergartens, and a lack of integration with the Department of Education and Training (DET)'s Kindergarten Infrastructure and Services Plans (KISP). While the plan references community needs, it offers limited direction on how these needs will be met, when planning and delivery will occur, and how such facilities will be funded. Similarly, although aged care and independent living are encouraged, there is no corresponding implementation strategy to guide or guarantee delivery outcomes, undermining the intent to support healthy ageing in place. Also, of concern is that there is no reference to the anticipated need for new schools.

There is confusion in how existing infrastructure is referenced. For example, the Cheltenham Community Centre (CCC), a funded Neighbourhood House, is inaccurately referred to as a general "community hub." Many key existing facilities, including some within or servicing Kingston, are either missing from maps or not adequately considered in assessments. Mapping gaps also affect visibility of recreation and creative spaces. The need for greater specificity in language, facility naming, and spatial referencing is clear.

In Cheltenham, land use planning decisions regarding future community facilities should be based on the suitability of sites rather than their ownership. The hierarchy that prioritises Council-owned land over state-owned assets lacks justification and is not supported. A notable example is Sir William Fry Reserve, where the Council has consistently advocated for a community hub. However, the Structure Plan appears to deprioritise this in favour of other Council-owned parcels, contradicting established advocacy and the site's strategic value.

Since the release of the Business Investment Case highlighting the population and jobs increases within the Cheltenham Precinct, Council has anticipated the need for a Regional Community hub and Library. Council's design advocacy and prior structure plan submissions have highlighted the station precinct / central core as the preferred location for this community facility citing:

- Its excellent access to public transport including both the SRL and Metro lines, and proximity to the bus interchange, which maximise transport choice
- Its location along the strategic walking and cycling corridor provides high levels of accessibility
- Synergies with the high-density employment precinct including commercial, retail and entertainment offerings
- The opportunity to co-locate a community facility with a designated regional recreational facility
- Its adjacency to Sir William Fry Reserve maximises opportunities for community events anchored by a civic land use.
- Its location within the centre of the SRL precinct, combined with designated improvements to the transport network provides for superior local access
- The facility has the potential to be a catalyst land use within the station precinct upon SRL East opening.

Lastly, the concept of “co-location” and “shared use” is mentioned without clear guidance on how it will reduce the need for new stand-alone facilities or how upgrades of existing infrastructure would be funded or delivered. Without more detail, it remains unclear whether co-location represents a meaningful efficiency or simply a deferral of investment.

Summary/Recommendations

General

- The Structure Plans/PSAs lack direction on the future provision of kindergartens, including whether KISP population figures will include SRL projections, and how early planning for new facilities will be coordinated.
- There is no reference to the anticipated need for new schools. If school provision is expected, this must be space planned now.
- The omission of childcare from infrastructure typologies is problematic. While it is often privately delivered, its close link to kindergarten services justifies its inclusion in the planning framework.
- The proposed metric for Maternal and Child Health (MCH) is insufficient. At least two consulting rooms should be required for operational efficiency and staff safety, not “1-2 spaces.”
- The documents frequently refer to generic “neighbourhood houses” and “creative spaces” rather than naming actual facilities, leading to confusion and limiting strategic clarity.
- Clarify how population forecasts align with projected dwelling supply, particularly where forecasts exceed Council's .id projections.
- Strengthen guidance around co-location and clarify whether this will reduce the need for additional facilities or require investment in upgrades. If so, examples beyond sport are needed.
- There is no clear strategy or implementation mechanism for the delivery of residential aged care or independent living, despite policy support for ageing in place.
- Funding for the provision of community infrastructure needs to be resolved prior to the gazettal of the PSAs to ensure collection of development contributions fairly occurs from the outset.

Cheltenham Precinct-Specific Issues

- Land use decisions for community infrastructure must prioritise suitability over ownership. Council does not support giving priority to Council-owned sites over Crown or state-owned land.
- Sir William Fry Reserve should be prioritised for delivery of a community hub, consistent with Council's long-standing advocacy.
- The Cheltenham Community Centre should be correctly identified as a funded Neighbourhood House, and its long-term planning needs, including potential relocation to a Council-owned site, should be considered.
- A preferred library or community hub site should be identified within the station masterplan area; Highett is not considered appropriate.
- Several important facilities are omitted from mapping, including Cheltenham Hall, Kingston Heath, Le Page, Mentone Reserve, Walter Galt, Southern Road Reserve, and Waves Leisure Centre.
- Cheltenham Library should be confirmed as being located in the Central Core, not described as a “potential” site.

- Terminology such as “creative spaces” or “current community hubs” should be replaced with proper facility names.
- Mapping should clearly identify which facilities are located outside of the Kingston boundary, particularly those relied upon to meet local demand.

Clayton Precinct-Specific Issues

- The omission of Kingston Health from mapped infrastructure is a notable gap and should be rectified.
- Forecasts for both population and dwelling growth in Clayton must be explained in relation to infrastructure needs.
- A portion of the site at 1400 Centre Road, which is located within the designated SRL strategic site, should be identified for community infrastructure opportunity, particularly given its adjacency to recent apartment development.
- Additional clarity is needed regarding community infrastructure in the area around Centre Road and Lomandra Drive.

6. Open Space

With the significant increase in population forecast through the project sufficient open space must be provided for the new and existing population including workers. Proposed future new areas of open space in the structure plan areas are vague and are identified as 'investigation areas'. There is insufficient detail about the function, size and purpose of the identified open spaces. There is also 'lost' open space through the buildings to be constructed on Sir William Fry Reserve, a major open space facility in Cheltenham. In addition, the Gas Works site is identified for high growth and will have a new substantial population which should identify where open space should be provided.

There is an existing requirement through the SRL East Public Open Space Management Framework that the 1.14ha of open space permanently lost to the rail and infrastructure works be replaced prior to construction. The Structure Plan and PSAs must provide certainty about where the new open space offset is to be provided, the nature of the open space and the timing of its delivery. However, this detail is lacking in the draft documentation. This offset open space must be considered as part of the Structure Plan/PSAs and is not to be confused/interchangeable with the proposed new open space needed to service the growing population.

Council is extremely concerned about recent information regarding the replacement of open space lost to the significant development parcels set aside by SRLA within the station environs.

SRLA have advised Council that the open space lost to the development parcels within the station environs will not be offset in addition to the 1.14ha lost to rail and infrastructure works. SRLA have advised that an open space contribution (either monetary or provision of some open space as part of the development) as per the Public Open Space Requirements of Clause 53.01 of the Kingston Planning Scheme will apply to these sites.

It is critical that the matters of open space offsets and open space contributions are treated separately as they are triggered for separate reasons.

The Environmental Effects Statement, the Minister's assessment and approved Environmental Performance Requirements for the SRL East are firm in their requirement to replace open space permanently lost to the Project. The deferral of the consideration of the 'white boxes' (sites subject to future precinct planning process) from the EES process to the current precinct planning process does not negate the need to replace open space which is lost to the project, or abscond the Authority from their duty to do what is fair. There is no justification for a different approach to lost open space for rail and infrastructure versus development parcels - the existing open space is lost either way and must be replaced.

Council appreciates that development parcels present an opportunity for SRLA to recoup costs associated with the project, but this further loss of open space has not been communicated transparently, nor reimbursed adequately. Council doesn't accept the Project's absorption of its valued and serviceable open space for the purposes of vague, unplanned development sites, with no intention to replace it.

Council is not convinced that the basis for the ratio being adopted for the Cheltenham and Clayton precincts is appropriate. It is noted that the peer review of SRLA's Open Space Assessment undertaken by CRED did not endorse the 9sqm per person metric.

The Open Space Assessment acknowledges that some areas won't meet the 9.2sqm per person target and suggests that deficits could be addressed by opening access to private open spaces, better utilising underused areas such as viaduct spaces, and encouraging developers to provide communal or publicly accessible private open spaces. This is not considered an acceptable solution.

Clayton's open space provision is particularly low at 5sqm per person and will receive about a sixth of the amount of new open space proposed for Cheltenham which is unacceptable. Council is also concerned that pocket parks have been calculated in the open space needs assessment and that green links are considered as open space.

With the rapid densification proposed, it is also important to highlight the need to deliver Kingston Fields to meet growing demand for new sporting fields. Kingston Fields (the offset for the Delta site) is proposed to help meet the needs of several sporting codes including cycling, hockey, soccer, AFL and cricket and attract thousands of users from across the region each year. It is also proposed to help alleviate demand pressure on other regional sport centres such as Kingston Heath Reserve which is experiencing strong demand for baseball and hockey. This demand is likely to be exacerbated by the SRLA's proposed population and density increases. The recreational importance of Sir William Fry Reserve for Cheltenham should also be highlighted as there are no other sporting facilities within the Structure Plan area.

A precinct-based approach has been adopted for the open space assessment, whereas it should be an assessment of the capacity for regional and district open space to cater for the additional demand. Existing open spaces on the periphery of the precinct boundaries (e.g. Highett Reserve) will also be servicing the future population, and these spaces should be enhanced and connectivity to them will need to be improved.

Summary/Recommendations

- The PSAs should identify locations, size, function and purpose for open space and a funding mechanism.
- The PSAs should quantify and identify the location of lost open space at Sir William Fry from the station buildings and infrastructure.
- The recreational importance of Sir William Fry Reserve should be highlighted as there are no sporting facilities within the Structure Plan area.
- The Gasworks site must identify sufficient open space for the new population.
- The development parcels in the Cheltenham station environs must be offset with open space of an equivalent size and function.
- The offset for the Delta site to deliver Kingston Fields will become increasingly important.
- There is concern over assessment of open space and the adopted provision ratio. Sufficient open space must be provided, opening access to private open space is not considered as an acceptable solution.
- A broader approach for open space assessment should be made including for regional and district open space and existing open spaces on the periphery of the precinct boundaries.
- Open space demand generated by employment uses must also be considered in open space assessment.

7. Recreation

Population growth within the structure plan areas will increase demand for recreation facilities. The Community Infrastructure Needs Assessment assesses demand and makes recommendations for future recreation provision such as indoor and outdoor courts and sports fields.

A key limitation to the assessment is that it does not speak to the open space assessment. This linkage is important as the recreational facilities need to be integrated into the overall open space network - the missing detail about the location, form, function of open space has impacts on recreation planning and needs to be addressed as part of the finalisation of the plans.

Kingston has adopted provision ratios for its high participation sports across a local/district/municipal/regional hierarchy. The ratios are reflective of actual participation rates in Kingston as well as industry benchmarking and the quantum of people that reside in suburbs and districts within Kingston. These rates will be further reviewed as part of our review of Sport and Recreation Strategy in 2025. There is a marked variation between Council's provision ratios and those proposed by SRLA, for example, Kingston's current outdoor courts ratio is 1:8,000 compared with SRLA's 1:2,000. It is Council's strong view that local provision ratios be adopted that reflect local needs. Council is also dubious of the international ratios the Community Infrastructure Assessment cites as helping inform its proposed provision ratios and sees cities such as New York and London as discordant with the contexts of Cheltenham and Clayton.

A concerning omission of the recreation needs assessment is a comprehensive assessment of regional facilities. Identified recreational demand is proposed to be met within existing regional facilities without any assessment of whether this will be possible, and any land provision if not. Council is unconvinced of the validity of the recommendations as they need to look beyond the precinct catchment to obtain the required level of detail. Council would like to explore contributions to improve and increase capacity of facilities outside of the 1.6km precinct area to meet projected need, given these types of facilities are provided as district level facilities and draw participation from a 5-10km travel. The assessment acknowledges that acquiring land will be difficult in the structure plan and wider precinct area, and that it will need to be met at a regional level elsewhere, but there is no analysis of land availability on the fringe of the precinct. Whilst Council appreciates the need for a limited study area this is an instance where a wider assessment must be undertaken at this stage. An example of a facility likely to serve the future Cheltenham Structure Plan area population is the Hightett Waves aquatic facility. Kingston is currently preparing an investment strategy for the facility which is currently close to capacity with the current gym facilities at capacity and not meeting need.

Council also highlights the opportunity for the Kingston Fields project to contribute to meeting projected demand for sporting facilities. Kingston Fields is a future district-level recreational facility originally to be located on the Delta site (now Southern Stabling Yard) to include several sporting facilities including cycling, hockey, soccer, AFL and cricket. Sports and Recreation Victoria has committed \$1 million to the planning for the project, illustrating commitment to its delivery. Given the spatial constraints, the project could take pressure off local playing fields by potentially relocating current localised uses to a regional site (where appropriate), and enabling use of local open space for more locally dependent uses.

Other limitations of the assessment that require attention are the absent detailed assessment of the current capacity and demand for existing sporting fields which are recommended to be used, that private golf courses have been included amongst recreation resources available in the area and the reliance

upon Joint or Shared Use Agreements within education settings, which have historically been challenging for Council. The interchangeable reference between the Structure Plan Area and Precinct Catchment also creates confusion, for example, in Clayton whilst there are 5.4 fields required for the Structure Plan Area, there are 8.6 fields required for the 1.6km catchment. The way it is written in the report you could be led to think that the 5.4 field requirement is met by the 5-field provision in the broader 1.6km catchment area.

As for all other infrastructure provision, clarity is also required as to the responsibility and funding source for the additional recreational infrastructure required to service the additional population. This funding source must be finalised prior to the gazettal of the PSAs to ensure fair contribution from developers within the SRL Structure Plan areas.

Summary/Recommendations

- The recreational needs assessment needs to speak to the open space assessment.
- Kingston's adopted provision ratios need to be used.
- Regional facilities need to be included as part of the assessment.
- Absent detailed assessment of existing sporting fields.
- Opportunity for Kingston Fields to meet projected demand for sporting facilities.
- Assessment concerns such as the inclusion of privately owned golf courses in recreation assets and reliance on Shared User Agreements and interchangeable reference to structure plan area and precinct catchment.
- Funding for the additional recreational facilities must be resolved prior to gazettal of the PSAs.

8. Urban Design and Built Form

Urban design and built form are the cornerstones of shaping liveable, sustainable, and resilient precincts. They influence how people interact with their surroundings, access services, and experience public life. As the SRL precincts are poised for significant growth and intensified development, the ability to shape outcomes through clear, consistent, and implementable urban design strategies becomes paramount. High-quality urban design ensures that density is delivered in a way that protects amenity, fosters a strong sense of place, integrates seamlessly with infrastructure, and responds to the existing character of the neighbourhood.

Strategic Alignment and Consistency

A key challenge across the SRL documentation is the lack of alignment between the Urban Design Technical Reports, Structure Plans, and Planning Scheme Amendments (PSAs). The underlying strategy of concentrating taller development in the central core and tapering towards the edges is not consistently applied. Key design principles from the technical reports are not always reflected in the planning controls, including height strategies, podium design, overshadowing benchmarks, and public realm interfaces.

There is limited clarity on how the six nominated “place types” and corresponding development types translate into planning mechanisms. The absence of preferred neighbourhood character statements further weakens decision-making, particularly where applications exceed discretionary controls. Additionally, the absence of 3D modelling and site-based testing limits the ability to fully understand the visual and spatial implications of the proposed built form framework.

Floor Area Ratio (FAR), Site Coverage and Overshadowing

Floor Area Ratio (FAR) is introduced inconsistently across the documentation and is absent from the Structure Plans. Without clear modelling or testing, it is uncertain whether the proposed FARs will deliver the intended outcomes, particularly in unconsolidated sites or sites with irregular shape or topography. Similarly, site coverage controls vary across precincts without sufficient explanation or performance-based justification.

Overshadowing provisions also are inconsistently applied, especially in relation to public open space and rear private open space. For instance, different sunlight access benchmarks are used for Sir William Fry Reserve compared to other open spaces, with no clear rationale.

Built Form Controls and Interface Design

Built form controls are overly generic in many locations, failing to address key interface and design quality concerns. Setbacks, height transitions, podium-tower relationships, and façade articulation lack detailed guidance. Podium heights are often similar to total building heights, creating an unclear streetscape hierarchy. Upper-level setbacks above podiums are limited to 2–3m, where 5m would be more effective in distinguishing the podium from the tower / capstone. Interface management between buildings with varying setback requirements (e.g. 0m versus 4.5m) and neighbouring low-rise homes is also not addressed. We are unconvinced by the attached, unconsolidated built form along key movement corridors. It is unclear how the strategy responds to any singular site development without consolidation, and what setbacks or permeability standards apply.

Definitions for mid-rise and high-rise forms are inconsistently applied across the documents. Transparency controls are not nominated in all commercial locations, and Minimum floor-to-ceiling/floor-to-floor heights are not nominated, raising concerns about long-term vibrancy and adaptability of retail/commercial spaces.

Site-Specific Amenity and Design Quality

There is a lack of guidance to ensure that development delivers good internal amenity and protects neighbouring properties. Privacy and overshadowing issues will be particularly challenging in areas where mid-rise built forms are placed adjacent to existing low-rise dwellings. The absence of consistent solar access benchmarks, privacy screens, and *adequate* building separation distances makes it difficult to assess whether high-density development will meet basic amenity expectations. South-facing lots or constrained sites, require more refined and orientation-sensitive controls to achieve appropriate outcomes.

The 6m rear setback for canopy trees and landscaping, although well-intentioned, has not been tested to confirm whether it is feasible across common lot types and orientations. Please refer to Section 10 for more detailed discussion.

Strategic Sites and Design Review

Strategic development sites across both precincts need more specific guidance. While the Structure Plans provide broad direction, strategic sites like the Gasworks and Southland in Cheltenham, and 1400 Centre Road in Clayton, lack nuance in terms of appropriate development typologies and controls. 1400 Centre Road lacks a masterplan equivalent to assist in proper site planning.

Design Review Panels are mentioned in the documents, but their process, authority, and governance remain unclear. While the council supports the use of panels, it seeks assurance that it will be involved in appointments and that the advice provided will carry appropriate statutory weight.

Where ‘flexible’ links and public infrastructure delivery depend on overcoming fragmented ownership or development incentives, clearer implementation responsibility and staging are needed. Failure to do so could result in unrealised links and undermine connectivity goals.

Cheltenham Precinct

The Cheltenham precinct includes some of the most dramatic height transitions in the SRL proposals, such as from 60m to 21m between Southland and adjacent residential areas like Jean Street. There is limited testing to assess how these transitions will impact amenity and visual character. Cross-sections along Bay Road are particularly important given its topographic variation, significance as a connector, and location at the precinct’s core.

The built form strategy is unclear for the Central Core, where there are no clear property boundaries within the site and a future UDLP applies. The interface strategy to Bay Road requires further contemplation to ensure the mixed-use core (being both sides of Bay Road) is cohesive. The Central Flanks also require better controls to avoid wedding cake-style forms, clarify rear laneway treatments, and enable active, fine-grain development.

To ensure a clear hierarchy in the built form, street wall heights along Chesterville Road should respect Southland’s prominence. The “more generous pedestrian environment” described for the Central Flanks

must also be clearly defined, including wider footpaths, landscape treatments, and high-quality interfaces.

Clayton Precinct

Sensitive rear interfaces, especially near recent subdivisions, demand greater attention. In locations with existing limited private open space, overshadowing and visual bulk must be managed carefully. The removal of third-party appeal rights emphasises the importance of this consideration. The Jackson Green site (Cedar Woods) also faces new different controls despite its completion. Limited analysis explains how this integrates into the broader First Street growth area.

Several mapping inconsistencies remain, including the omission of Olive and Parsons Streets' connection to James Street, which affects the built form and interface logic.

Summary/Recommendations OR Key issues

Strategic Alignment and Consistency

- Ensure consistency between technical studies, Structure Plans, and Planning Scheme Amendments (PSAs), particularly for height strategies, FAR, setbacks, overshadowing, and interface guidelines.
- Clarify and justify built form assumptions and demonstrate development feasibility for both consolidated and unconsolidated conditions.
- Include preferred neighbourhood character statements in the PSAs to assist with discretionary assessment.
- Provide 3D built form modelling and site-specific testing (for built form, solar access, tree canopy, site coverage, etc.) to validate key controls.

Floor Area Ratio (FAR), Site Coverage and Overshadowing

- Further test and justify the FAR and incorporate it into the Structure Plan and PSAs.
- Provide rationale for varied site coverage rates.
- Consistently apply overshadowing benchmarks and explain differences in application.

Built Form Controls and Interface Design

- Clarify definitions of low-rise, mid-rise and high-rise, and apply them consistently.
- Strengthen public realm interface controls, including active frontages and minimum ground floor heights.
- Provide clearer guidance for podium and tower relationships.

Site-Specific Amenity and Design Quality

- Include guidance to ensure:
 - Solar access and ventilation are orientation sensitive.
 - Design allowances for canopy tree success.
 - Internal amenity is addressed for high-density forms.

- Increase building separation to align with more contemporary applications.
- Address interface conflicts between 0m and 4.5m setbacks, and mid-rise/low-rise transitions.

Strategic Sites and Design Review

- Ensure all strategic sites receive appropriate built form guidance.
- Provide stronger masterplan guidance for large or complex development sites.
- Clarify the governance framework for Design Review Panels.
- Provide a clear implementation plan for 'flexible' links.
- Clarify decision-making discretion where appeal rights are removed.

Cheltenham Precinct-Specific Issues

- Conduct built form and amenity impact testing for significant height transition areas.
- Clarify how setbacks and building separation apply in the Central Core and along key corridors
- Provide cross-sections along Bay Road that reflect topography and interface expectations.
- Ensure Gasworks and Southland sites are assigned development typologies and controls.
- Provide clearer guidance on the expectations for built form in the Central Flanks.
- Prevent “wedding cake” outcomes along fine-grain streets by refining upper-level setback controls.
- Ensuring the street wall heights do not compete with the prominence of Southland.

Clayton Precinct-Specific Issues

- Protect amenity for constrained lots through clear overshadowing and interface standards.
- Correct mapping errors and update associated height controls.
- Clarify the intent and impact of new controls for Jackson Green and First Street precinct.

9. Public Realm and Street Typology

As SRL precincts evolve into higher density, transit-oriented neighbourhoods, the public realm becomes the primary shared space that supports amenities, movement, social life, and place identity. Streets and open spaces serve multiple functions, acting as key movement corridors, places for rest and socialising, green infrastructure, and connectors between different precincts and destinations. In denser environments where private space is reduced, the quality and usability of public space becomes even more critical to community well-being and liveability.

The SRL Structure Plans propose a public realm strategy that introduces four generic street typologies: boulevards, avenues, activity streets, and green streets. These typologies, along with new key pedestrian and cycling links that traverse private land, will be introduced. While this overarching strategy is welcome, its successful delivery relies on greater clarity, feasibility testing, and stronger design guidance tailored to local context.

Increased development intensity places significant pressure on the street network to deliver a wide range of functions, including supporting canopy targets and passive recreation, accommodating walking, cycling, buses, utilities, and freights. Many of these demands are competing, particularly in constrained corridors or where roads are managed by Department of Transport and Planning (DTP). The current framework lacks the specificity needed to resolve these competing demands. Cross-sections are generalised and do not demonstrate how conflicting requirements will be prioritised or balanced.

To avoid future delays, costly reworks, and provide greater community certainty, specific concept cross-sections should be developed and embedded in the PSAs for critical corridors. These sections should reflect the likely built form interface, site constraints, existing and proposed tree cover, and infrastructure limitations. Where the public realm strategy relies on transforming DTP-managed corridors (e.g. Nepean Highway, Bay Road, Centre Road, etc.), a formalised action to review relevant road authority policies (e.g. tree planting, median use, lane widths, etc.) should be included to enable the proposed changes.

The existing suite of street typologies lacks local responsiveness and doesn't provide tailored guidance for each corridor. For example, Bay Road Cheltenham and Centre Road Clayton have distinct conditions and roles in each precinct that require specific treatments. The "Green Street" typology is not consistently applied and lacks information on how active transport, greening, and water-sensitive infrastructure are prioritised and delivered. Similarly, "key links" shown throughout the Structure Plan are not supported by minimum design parameters or delivery mechanisms. These links, often passing through fragmented land or private development, will be essential for improving connectivity across large sites. However, their delivery cannot be assumed without clarity on dimensions, function, staging, and implementation responsibility. Where links are proposed through future developments, planning controls must include mandatory requirements to ensure they are delivered.

Weather protection, shade, and solar access are essential to create usable and welcoming streets. Yet these considerations are absent from the Structure Plans and cross-section diagrams. Key movement corridors, high-volume pedestrian routes, and interchange points should include weather protection through integrated canopy trees or building awnings. These improvements are particularly important for station access routes and retail streets where all-weather usability supports economic and social activity.

Increased greening and canopy coverage are also vital to the Structure Plan vision, but its delivery will depend on adequate setbacks, deep soil and permeable zones, and resolving competing demands such as bus lanes, footpaths, and underground services.

More broadly, there is a lack of clarity on who is responsible for delivering and funding the street transformations. These elements are fundamental to the success of the precincts and must be addressed with specificity, cost attribution, and staging details.

Cheltenham Precinct

Bay Road requires a stronger design focus as both a structural connection and a civic spine linking Southland and the Precinct Core. The current indicative cross-section is inadequate to address topography, public transport, canopy planting, and active transport requirements. Therefore, concept cross-sections tailored to different segments of Bay Road must be developed and included in the Structure Plan and PSAs.

Highett Road poses challenges in competing movement and place functions, requiring further integration of its cross-section. Cycling accessibility is critical and must be factored into a more detailed streetscape cross-section.

The gateway to Highett Shopping Village from Nepean Highway on Highett Road deserves stronger design attention. It should be treated as a key entry point and enhanced through landscaping, public art, or built form, to encourage visitation and promote a legible street hierarchy.

Clayton Precinct

Centre Road is a key corridor that must accommodate high volumes of pedestrian, cycle, bus, and local traffic while supporting substantial redevelopment. The current typology doesn't have enough details in addressing landscaping, bus stops, and the interface with private development. Greater landscape setbacks and undergrounding power lines should be considered to unlock space for shade, seating, and active transport. The Southern side of Centre Road, where redevelopment is constrained, may also require a different approach to avoid fragmented and inconsistent outcomes.

Summary/Recommendations OR Key Issues

General

- Prepare feasible and clear concept cross-sections for all individual streets with a nominated 'street typology' that balances multiple functions including movement, greening, public life, utilities, and urban cooling.
- Develop tailored guidance for public realm upgrades, street typologies and key links reflecting real-world constraints.
- Include minimum widths, design expectations and delivery mechanisms for all identified "key links".
- Assign clear delivery and funding responsibilities for aspirational cross-sections and public realm improvements, especially where Council would otherwise bear costs. Funding mechanisms should be in place prior to gazettal of the PSAs.

- Clarify how proposed changes will be achieved in DTP-managed corridors.
- Address gaps in the function of Green Street typologies and expand to include active transport.
- Clarify key corridors transformation station.
- Require weather protection for key connection nodes and active transport corridors.

Cheltenham Precinct-Specific Issues

- Introduce gateway treatments to strengthen the Highett Shopping Village entrance from Nepean Highway through landscape, built form, or public art.
- Clarify if and how the Avenue concept applies to the full length of Bay Road.
- Identify Southland laneway interfaces and provide built form/public realm guidelines to ensure active and safe interfaces.
- Apply strategies to Cheltenham to improve vibrancy and activation outcomes.

Clayton Precinct-Specific Issues

- Include Kombi Street and Haughton Road/Main Road as 'Green Streets'.

10. Canopy Coverage and Urban Greening

The SRL Precinct Structure Plans emphasise the importance of urban greening and canopy coverage to support climate resilience, amenity, and liveability in high-density precincts. However, the strategies and actions lack the clarity and direction needed to deliver meaningful outcomes across the full spectrum of land uses.

There is a general lack of specificity regarding how canopy coverage targets will be achieved, especially in constrained urban areas and within private developments. As discussed in the Section 9, while the public realm, (e.g. streets and parks) offers opportunities, competition for space and conflicting infrastructure demands (e.g., underground services, utilities, built form setbacks, and transport infrastructure) will limit planting potential, and detailed cross sections are required to understand and resolve this issue. As discussed in Section 8 regarding private developments, the reality of accommodating large canopy trees is rarely achievable without appropriate deep soil zones and sufficient solar access, yet these enablers are not clearly mandated or supported by built form controls.

While the Structure Plan documents regularly refer to "optimising canopy coverage," this language is vague and lacks commitment to tangible action. Council policy aims for a 20% tree canopy cover target across all land tenure and 30% in Council-managed parks and reserves. Achieving these targets will require more than general advocacy. It needs enforceable planning controls, properly resourced programs, and alignment between State and Local Government initiatives.

The canopy coverage discussion also fails to address vertical greening and above-ground opportunities in all Precinct Zone schedules (e.g. green roofs and walls), as viable alternatives in areas where at-grade planting is not feasible. These approaches can contribute to cooling, stormwater mitigation, and urban biodiversity if supported by appropriate design guidance, incentives, and planning controls.

Planting trees along arterial roads (i.e. Nepean Highway and Centre Road) can also be constrained under the current Department of Transport and Planning (DTP) Head, Transport for Victoria policy. Council's past attempts have been pushed back, and there is currently no clear funding or delivery pathway to achieve tree canopy objectives on these key corridors. If SRL's vision for boulevards and avenues is to be realised, a coordinated and adequately funded implementation strategy is essential.

In the absence of clear planning tools, funding commitments, and implementation responsibilities, the current structure plan proposals will be unlikely to deliver the level of urban greening required to support SRL's vision, mitigate heat island effects, or meet Council's greening targets.

Summary/Recommendations OR Key Issues

- Replace vague terminology such as "optimise canopy cover" with clear, measurable requirements for greening outcomes.
- Provide stronger, enforceable mechanisms to achieve canopy coverage targets:
 - 30% canopy coverage in parks and reserves.
 - 20% coverage across all land tenures within the Structure Plan area.
- Ensure setbacks (front, side, rear) are adequate for deep soil zones and are protected from basement encroachment.

- Address challenges to canopy cover in constrained areas by requiring green roofs, vertical greening and other green infrastructure in areas where deep soil planting is not feasible.
- Urban Greening Plan should be a requirement of all Precinct Zone schedules.
- Incorporate greening guidelines into street typology guidance.
- Acknowledge the implementation challenges on DTP Head, Transport for Victoria-managed roads and include actions to:
 - Review DTP's tree planting policies.
 - Enable planting of large canopy trees through barrier installation and updated safety standards.
- Expand the scope of greening strategies to include urban cooling, green infrastructure, and resilience planning:
 - Set targets for non-canopy greening strategies, including vertical greening and green infrastructure.
 - Reference heat vulnerability mapping and align greening priorities with areas of greatest urban heat impact.
- Ensure funding is allocated to planting, establishment and maintenance phases.
- Require greening objectives through stronger language in both Structure Plans and planning controls.
- Avoid over-reliance on greening in public open space to compensate for underperformance elsewhere to ensure a balanced and distributed approach.

11. Sustainability

Council is cognisant of the sustainability challenges associated with a rapidly growing population and is committed to encouraging greater climate change resilience and sustainability outcomes. In January 2020 the City of Kingston declared a Climate and Ecological Emergency and in July 2021 endorsed its Climate and Ecological Response Plan, which commits to achieving net zero community emissions by 2030.

Broader objectives and targets relating to climate risk and resilience are missing from the Structure Plan. Whilst the Structure Plan includes objectives on specific issues of a cool, green, biodiverse environment and IWM, their Climate Response Plan (CRP) refers to other areas that need to be addressed, or that are missing from the Structure Plan objectives. Further to this, it is critical that new developments are planned and sited to avoid climate risk.

Development is not required to demonstrate how adaptive measures have been incorporated into design and operations to reduce vulnerability to climate risks which is a desired outcome of the CRP.

Encouraging Environmentally Sustainable Development (ESD) is key contributor to reducing emissions. Though considerable consideration has been given to this area in the Plans, several areas can be improved. At a minimum, the Planning Scheme Amendment must refer to net-zero or net-zero strategies.

Objectives around embodied carbon reduction in new developments are supported but have not been translated into the Structure Plan Strategies, Actions or the PSAs. Council is supportive of a 5 Green Star Rating to be required for developments >5000sqm but the aim should be 6 Stars and further requirements for targeting net-zero should be included. There is no specific mention of net zero for developments <5000sqm, or a pathway to achieve this. 'Encouraging' an excellence rating in BESS is insufficient; this outcome should be mandated.

Council suggests Sustainability Management Plans are warranted for smaller developments. Smaller developments have a requirement to meet BESS standards; however, these do not go into detail on climate resilience.

Waste management plans (WMP) are another measure that should be required for all development scales within the structure plan area for construction and operational waste management. The CRP aspires to the 'Future Accelerated State' which seeks to deliver accelerated sustainability outcomes rather than a 'business as usual' approach.

Another measure towards a Future Accelerated State proposed by the CRP is as diverse local renewable energy generation distribution and storage to reduce emissions and support adaptation. Diverse, local renewable energy generation, distribution and storage is complex and expensive and relies on the Distribution Energy Network Provider (DNSP) to co-operate.

Lastly, energy use is the major emissions source in the Cheltenham and Clayton Structure Plan Areas, which accounts for over 70% of municipal greenhouse gas emissions. This represents an excellent opportunity for Kingston to achieve its net zero targets. The structure plan and planning scheme changes appear promising. However, use of nature-based offsets is not described and it's unclear where they will be located, who will pay and what contribution they will make. In addition, "Partnerships for a decarbonised energy supply" is insufficiently developed. If local government is to be involved in implementation at a municipal scale, funding sources must be described.

Summary/Recommendations

- Add specific wording to the Planning Scheme Amendment that refers to net-zero or net-zero strategies.
- Objectives around embodied carbon reduction in new developments needs to be translated into the Structure Plan and Planning Scheme Amendment.
- Include Sustainability Management Plans for smaller developments.
- Waste management plans should be required for all development scales for construction and operational waste management.
- Broader objectives and targets relating to climate risk and resilience should be included in the Structure Plan and PSAs.
- Construction energy use should be included given there are construction and operational waste management targets.

12. Integrated Water Management

While the Integrated Water Management (IWM) Strategy embedded within the Structure Plans indicates a positive policy direction, the detailed information provided across the supporting documentation reveals significant challenges in terms of feasibility, implementation, and governance.

Firstly, DEECA's new IWM Planning Guidelines is not referenced in the structure plan or its technical document. This document, endorsed by the IWM Forum Metro-Melbourne Working Group, introduces IWM Plans at strategic-cluster, municipality, and precinct scales. These plans define key aspects of integration, including why, what, how, who, and when. The Guidelines also introduce a suite of measures for setting seven precinct-scale targets, providing measurable benchmarks to clarify what embedding IWM in precinct planning entails and drive innovative, practical solutions.

Secondly, Water Sensitive Urban Design (WSUD), a key Structure Plan initiative, should be replaced with Integrated Water Management. WSUD is one of the many elements of IWM.

Furthermore, there is a lack of clarity regarding which authorities will assume leadership and responsibility for critical aspects of flood mitigation and the delivery of IWM. It is unclear whether Kingston Council will have a formal role in establishing On-Site Detention (OSD) objectives or be involved in broader design discussions. For instance, it remains unresolved whether developers will be required to detain the 1% Annual Exceedance Probability (AEP) gap flows in areas of increased imperviousness, a crucial factor in maintaining system capacity and resilience.

The proposed solutions outlined in the IWM Strategy also exhibit an overly optimistic tone and lack a robust foundation in the practical realities of implementation, particularly in densely urbanised areas like Cheltenham and Clayton. The strategy underestimates the challenges associated with delivering large-scale infrastructure upgrades within established activity centres. Initiatives such as passive tree watering, recycled water supply, and stormwater harvesting are heavily constrained by space limitations in both public and private domains. Kingston's previous efforts in implementing similar initiatives have demonstrated significant challenges, and the current assumptions do not adequately reflect this experience.

While the IWM Strategy (Section 5.1.3) acknowledges that the attainment of Best Practice Environmental Guidelines for Urban Stormwater (BPEM) targets will not be feasible, Section 5.1.4 suggests the possibility of alternative solutions. However, the report lacks a quantitative assessment of the shortfall and fails to propose a plan for identifying or funding practical alternatives. To achieve performance targets, a hybrid approach combining on-site treatments (e.g., rain gardens, green roofs, etc.) with Kingston's in-lieu contribution scheme must be supported. Critically, the PSAs must facilitate these mechanisms. Where on-site treatments are implemented, robust maintenance and asset management responsibilities must be clearly defined. Certain elements, such as road-based passive tree watering, as illustrated in Figures 5.2 and 5.6 of the IWM report, are impractical without comprehensive road reconstruction and substantial capital investment. The assumptions underpinning these strategies require revision and clarification, particularly within the assumptions outlined in Section 2.6.

The peer review supporting the IWM report (referenced on page 83) failed to evaluate the feasibility and realism of proposed treatment measures. This critical oversight undermines the report's recommendations and raises concerns about the practicality of its strategies.

While OSD and IWM are presented as future-oriented solutions, they fail to address existing flood risks. The IWM report mentions reductions in Mean Annual Runoff Volume (MARV) of 33% in Cheltenham and 41% in Clayton, but it does not assess changes to peak flow rates or determine whether these reductions are sufficient to mitigate flooding. Given the substantial development uplift proposed, higher levels of drainage service may be necessary. All modifications to existing conditions must undergo flood modelling, compliant with Melbourne Water's technical specifications, to understand the impact on upstream, downstream, and adjacent properties.

In addition, there are technical and policy gaps in the IWM objectives embedded in the Structure Plans. For example, Objectives 11 and 14 must be strengthened to support South East Water's business case for extending the Dingley recycled water scheme into Cheltenham. Additionally, Objective 23 should be expanded to encompass flood detention storage alongside other IWM initiatives such as blue-green infrastructure and stormwater harvesting. More comprehensive data is also required to estimate the irrigable public and private space that can support recycled water demand modelling.

Lastly, the introductory description of IWM in each Structure Plan should better articulate the multifaceted benefits of these strategies, not only for water management but also for broader outcomes related to greening, reducing urban heat, and enhancing liveability.

Summary/Recommendations

- Clarify the roles and responsibilities of authorities in IWM and flood mitigation, including Council's role in setting on-site stormwater detention (OSD) objectives.
- Acknowledge that many proposed IWM solutions (e.g. installing recycled water, passive tree watering, stormwater harvesting) are not feasible in highly urbanised areas without significant investment and structural changes.
- Strengthen the PSAs to enable a mix of on-site treatment and off-site in-lieu contributions, supported by mandated maintenance provisions.
- Revise assumptions around runoff diversion into nature strips as this is not practical without road reconstruction and must be reflected in the report's assumptions.
- Expand the risk assessment to include feasibility of treatment, retrofit costs, maintenance risks in private development, and enforceability through planning controls.
- Address existing flood issues more directly.
- Update IWM Strategy Objectives (particularly 11, 14, and 23) to support SEW's business case and include flood detention infrastructure.
- Include clearer, evidence-based water demand estimates to support recycled water delivery.
- Strengthen the narrative around IWM's role in urban cooling, liveability, and greening to reinforce its importance beyond drainage.
- DEECA's new IWM Planning Guidelines should be incorporated.

13. Economy

The Structure Plans for the Cheltenham and Clayton SRL precincts present a transformative vision for economic uplift, however a number of strategic gaps and risks remain unaddressed. These relate to preserving economic diversity, protecting existing businesses, and coordinating infrastructure investment to support sustainable growth.

Cheltenham Precinct

The anticipated increase in office and commercial space, commensurate with professional services growth, may inadvertently displace small to medium-sized businesses. Rising land values and rents make current locations unaffordable, especially without protection policies. The changing land use mix could also reduce industrial activity as market forces favour higher-value commercial development.

The 'station precinct' designation is too narrow and risks disrupting nearby business precincts like Charman Road North. A coordinated economic strategy between Southland's 'Strategic Site' and the SRL 'Station Core' limits complementary land uses and urban form. A mixed-use synergy is crucial for the precinct's economic vitality.

Connectivity remains a concern. High-quality, weather-protected, and intuitive pedestrian connections between Cheltenham SRL Station, Southland Station, Charman Road, and Southland Shopping Centre are essential for a seamless economic and retail hub.

The precinct's future intensification will cause conflicts between freight and consumer movements. Freight vehicles, especially Double-B trailers, currently share residential streets with traffic, creating unsafe conditions for other road users. A coordinated freight movement strategy is needed to safely manage logistics, especially as commercial activity increases.

If Southland limits its investment to its current land, adjacent properties may face disconnected or poorly integrated outcomes, causing fragmentation and design inconsistency between the Southland precinct and the Cheltenham Precinct. Southland Shopping Centre must transition to an outward-facing, active street frontage model with improved pedestrian interfaces and permeability to strengthen its integration into the wider precinct.

The transformation of the Southland Strategy Site and Bayside Business District may unintentionally create a competitive dynamic with similar commercial offerings, weakening both centres and impacting other local retail strips. Without coordination, vacancies and underutilised stock could emerge, especially as newer developments draw businesses away from ageing infrastructure.

Bay Road is a key corridor for supporting both Southland and Bayside Business District's growth, but its current configuration, especially between Jack Road and the railway line, is inadequate for two lanes of traffic in each direction. Significant growth or expansion of small shopping centres like Jack Street requires upgrading and reimagining this section of Bay Road as a true 'Avenue' with clear urban design and movement functions.

Clayton Precinct

The Clayton Structure Plan should be aligned with the Kingston Economic Development Strategy to ensure locally responsive industry support and job creation.

Clayton Precinct's planned economy heavily relies on the health sector, particularly the health innovation precinct. While this sector provides a strong anchor, over-reliance on a single industry renders it susceptible to market saturation and competition. Economic resilience necessitates deliberate planning for diversification, including the support of industries that complement health, education, and research. This encompasses considering industries such as accommodation, which is crucial for Monash Medical Centre's patients and student housing linked to Monash and Deakin Universities.

Preserving industrial land in Clayton South is vital. While some activities may decline, industrial-zoned land should be protected to support local services, jobs, and small-scale production. The Audsley Street Industrial Area should continue as a key employment zone, with potential for further intensification within the local economy.

The proposed requirement for commercial ground floor uses along Centre Road may lead to significant vacancy rates. While activating Centre Road is worthwhile, the proximity to planned office space (approximately 86,000 sqm) means any further commercial floorspace requirements must be supported by strong demand modelling and feasibility testing to avoid poor urban outcomes.

Summary/Recommendations

Cheltenham Precinct-Specific Issues

- Rising land values and rents risk displacing existing small-to-medium businesses, mechanisms to retain economic diversity should be considered.
- The station precinct's designation as the sole 'precinct core' area limits integration with nearby precincts. The precinct should be planned with the consideration of smaller centres on broader context and create better connections both physically and strategically.
- Improved pedestrian connections with weather protection and wayfinding are needed to link SRL Cheltenham Station with Southland Station, Southland Shopping Centre, and Charman Road.
- Freight movement conflicts with consumer vehicle movement in residential areas, which must be addressed through a coordinated logistics and movement strategy.
- The Structure Plan must account for the scenario if Westfield Southland limits investment to its current footprint only, to avoid disconnected outcomes.
- Upgrade and future-proof Bay Road between Jack Road and the railway line to support growing business centres.
- Ensure Southland Shopping Centre evolves to deliver active, outward-facing frontages.
- Plan for a complementary relationship (rather than competitive) between Southland and Bayside Business District to avoid over-saturation and business displacement.

Clayton Precinct-Specific Issues

- Align the Structure Plan and PSAs more closely with the Kingston Economic Development Strategy.
- Diversify the economic base beyond health care to support resilience and attract a diverse workforce.
- Protect and intensify Clayton South's existing industrial land (i.e. Audsley Street Industrial Area) as a key local employment precinct.

- Incorporate planning for supporting industries (e.g. accommodation, student housing, etc) linked to Monash Health and Monash University.
- Review the ground floor commercial activation requirements along Centre Road to avoid increased vacancy and poor amenity outcomes.

14. Amenity Impacts

This section focuses on the findings and recommendations from the Wind Technical Report, Noise and Vibration Technical Reports, and Odour and Dust Technical Report. It should be read in conjunction with other amenity impact concerns raised in the rest of this submission, such as protection of existing solar access, etc. The reports fall short of comprehensively addressing the diverse range of impacts that are likely to affect the SRL precincts, both during construction and in the long term as development intensifies. The Wind Technical Report primarily concentrates on pedestrian-level wind conditions at 1.5m above ground, disregarding higher-altitude wind behaviour that considers wind shear or turbulence at aircraft approach altitudes, which is particularly pertinent for Moorabbin Airport.

The report also exhibits the absence of references to successful wind mitigation case studies from similar densely populated urban areas. Further information including comparative analysis of alternative modelling techniques (e.g. wind tunnel validation), discussion on modelling uncertainties, particularly those arising from future urban development changes that could substantially alter the local environment. In areas where wind exceedance is identified, the report does not distinguish between mandatory mitigation measures and best practice design suggestions.

The Noise and Vibration Technical Report also requires further refinement. The assumption that existing industrial and commercial operations currently comply with their noise obligations is not a reliable foundation for future planning, as is evidenced through the noise complaints Council frequently receives.

No Baseline noise or vibration surveys were conducted as part of the study, which limits the accuracy of existing conditions and diminishes confidence in the recommendations. These surveys are crucial for informing effective modelling and providing a more comprehensive understanding of the cumulative amenity impacts from novel and existing uses.

Additionally, aircraft noise impacts require clearer consideration within the structure plans. A consistent approach should be adopted to apply Australian Standard AS 2021:2015 to noise-sensitive uses near airports, even outside formal overlays. Future occupants should also be made aware of potential aircraft noise despite any attenuation measures, to ensure informed decision-making and manage expectations. A local policy should be implemented to achieve this, which then be included in section 32 statements to make future purchasers aware of the potential aircraft noise.

Lastly, there is a need for more clarity regarding the operating hours of the report's 'Noise Source Identification' section. Several existing industrial and commercial operations within the vicinity operate outside standard hours (e.g. deliveries, refuse collection, and 24-hour manufacturing facilities, etc). These extended hour activities must be accounted for in any impact assessment.

The refinements to these technical reports are needed, and must therefore be taken into account in the PSAs.

Summary/Recommendations

- The Wind Technical Report must:

- Include higher-altitude analysis relevant to Moorabbin Airport and aircraft operations, rather than only focusing on pedestrian height (1.5m).
 - Reference relevant case studies for wind mitigation, compare modelling techniques, and include a section on limitations and uncertainties.
 - Clarify which wind exceedance mitigation recommendations are mandatory versus best practice.
- The Noise and Vibration Report should not assume all existing development is compliant and should address actual usage patterns. Baseline noise and vibration surveys should be undertaken to support accurate modelling and impact assessment.
- Adopt a consistent approach to aircraft noise impacts using AS 2021:2015 and ensure future occupants are aware of potential noise exposure.

15. Utilities

The Utilities Servicing Technical Report lacks clarity regarding the essential service infrastructure upgrades needed to support projected population, employment, and housing growth across the SRL precincts. While the report identifies high-level augmentation needs, only a specific upgrade plan for sewer infrastructure is provided. Equivalent plans for other critical services (e.g. electricity, water, telecommunications, etc) are not outlined.

A particular concern is the potential relocation of existing utilities from private properties or easements to road reserves to unlock development opportunities. This may enable land use transformation but would have significant implications for public infrastructure design, maintenance, and management. New services installed in road reserves would also likely occupy nature strips or require trenching beneath road surfaces, potentially leading to conflicts in managing street trees, pedestrian zones, and asset protection (e.g. electricity, telecommunications, etc).

The report (specifically Table 5.5) suggests that current electricity networks will be unable to keep up with the projected growth demand, which may operate beyond the existing N-1 capacity standard (Note: N-1 means the power grid can operate without a significant power outage when one powerline fails). This indicates the necessity of network augmentation across multiple utilities. However, the report fails to specify when, how, or by whom these upgrades will be funded and delivered.

It remains uncertain whether future development proposals within the 1.6km radius of the SRL stations will be required to address or contribute to these infrastructure upgrades as part of their planning approvals. Additionally, drainage infrastructure is not discussed in the Utilities report.

To enable Council to assess and support future development and infrastructure coordination, greater transparency, certainty, and alignment with implementation and funding mechanisms are required.

Summary/Recommendations

- Future utility upgrades are discussed in high-level terms only. Detailed augmentation plans are missing.
- Existing services, which are in the current properties/easements from impacted land that will need to be relocated to road reserves, and any new services proposed in the road reserve, will impact the infrastructure design, road pavement, and nature strip functionality of road reserve.
- The utilities demand from the projected growth in population, employment and dwelling would be likely to exceed the current N-1 capacity.
- It is unclear whether future developments within 1.6km of the SRL station will be required to deliver or contribute funding necessary for utility infrastructure upgrades.
- Drainage infrastructure is not addressed in the Utilities Technical Report.

Appendix – Recommendations and Key Issues

Summary

1. General Issues

- Council will continue to be a constructive participant in the precinct planning process and welcomes opportunities to work with SRLA to resolve issues with drafted material ahead of and during the IAC Hearing.
- A detailed breakdown of the demographic profiles must be provided without delay.
- Further precinct coordination on projects such as Highett Level Crossing Removal Project and the Activity Centre Program Implemented at Moorabbin is required.
- Clarify the financial implications of the Planning Scheme Amendments in relation to Windfall Gains Tax, and how these impacts will be managed through the Implementation Plan.
- A significant number of Council policies and documents have not been considered and need to be included.

2. Implementation Plan & Funding

- Funding of infrastructure must be addressed as part of this process and before any planning scheme amendment to facilitate development is gazetted.
- The new Ministerial Direction on Infrastructure Contributions Plans (ICPs) does not apply to SRL precincts and leaves a critical funding gap that must be addressed as part of this process.
- Delivery of key infrastructure needs to be prioritised to ensure it does not lag growth.
- The ‘partnership’ arrangement for project delivery proposed by the Implementation Plan needs to be defined.
- Clarity on implementation pathways, in particular, relevant roles and responsibilities for each project.
- The Implementation Plan and funding mechanism must provide confidence that there is no cost shifting/burden to Council and that infrastructure will be delivered in a timely manner to meet the needs of the growing population.

3. Planning Scheme Amendment

- Important elements of the Draft Structure Plans and technical reports to be reflected in the Planning Scheme Amendment.
- Clarity on Council’s role as Responsible Authority.
- Guidance required for discouraging under development proposals and encouraging lot consolidation.
- Remove inappropriate references to the ‘SRL precinct’.
- Clarification on the status of SRL East Structure Plan areas in relation to the Activity Centre Hierarchy.
- Clarify requirements relating to character and development type to ensure they can be achieved.

- Standards of the BFO relating to the provision of public laneways require refinement.
- Controls should discourage garage-dominated street frontage.
- Third-party rights exemption should be tailored to enable a nuanced approach.
- Utilisation of applied zones is inefficient and not ‘future proofed’.
- References to the protection of neighbouring amenity need to be instated.
- Some variations to the zones should be considered for appropriateness.
- New public open space or community facilities need to be reflected in the Precinct Zone map.
- Further clarification regarding master planning process.
- Master Plan provisions at Highett Gasworks to retain important requirements of existing DPO.
- Legality issues with uplift provisions to be resolved as part of this process.
- A framework for management of s173 agreements for uplift to be outlined.
- The methodology for the application of areas ‘A’ and ‘B’ of the Parking Overlay need to be clearly justified.
- Concerns about the potential implications of the maximum parking requirement.
- Planning controls for development near the airport should be strengthened – suggest making airspace height limits mandatory, not just guidelines and the need for wider airport stakeholder communications.
- Drafting to be reviewed in detail to ensure workability and fairness.
- Apply the EAO to all potentially contaminated land in accordance with best practice and to align with the General Environmental Duty
- Consider how the Precinct Zone interacts with recently introduced particular provisions, such as Clause 53.25.

4. Traffic, Transport & Parking

Supporting Modal Shift

- Provide a clearly staged and funded interim parking and transport strategy to manage the lag in infrastructure (before station operation).
- Ensure key public and active transport infrastructure (e.g. bus interchange, improved pedestrian access, active transport links) is delivered or substantially progressed by station opening.
- Clarify implementation strategy for proposed consolidated carparks and how these support mode shift.
- Improve the interchange experience between the SRL and Metro stations including clarity on the future of Southland Station.

Active Transport

- Address connectivity gaps in the pedestrian and cycling network, in both mapping and implementation plans.
- Strengthen East-West connectivity in Clayton between Meppel Drive to Knight Street, Karen Street to Chesterville Road (Cheltenham).
- Improve integration with local connectivity, not just key links to the new SRL stations.
- Review and revise nominated cycling corridors where they are not feasible or supported by infrastructure.
- Conduct accessibility audits and leverage Council’s existing accessibility study.

- Upgrade poor pedestrian environments, including unsafe underpasses and incomplete crossings.
- Provide clarity and delivery plans for micro-mobility infrastructure and mobility hubs and expand functionality beyond cycle parking.
- Increase proposed bicycle parking provision rates, associated requirements and clarify provisions for covered/sheltered parking in high-use areas.

Data, Modelling and Analysis

- Adjust baseline data and travel patterns to account for Covid-19 impacts and post-pandemic behavioural changes.
- Provide transparency on the modelling methodology, including clarification on assumptions for trip distribution, capacity planning, and worst-case scenario testing.
- Clarify whether mode share targets are evidence-based or aspirational, and link modelling outputs to infrastructure recommendations.
- Expand and publish details on microsimulation modelling and how it will inform delivery.

Managing Local Streets

- Clearly identify who will lead, fund, and consult on the implementation of local street changes, including speed limit reductions and safety treatments.
- Specify actions and locations for local area traffic management measures.
- Integrate cost planning and infrastructure responsibilities into the street management strategy to support practical implementation.

Parking

- Clarify inconsistencies between observed parking behaviour and conclusions in the technical reports regarding current management effectiveness.
- Identify responsible authority for the preparation, monitoring and review of the Parking Precinct Plans and Car Parking Reuse Plans.
- Provide guidance on EV charging infrastructure provision in new developments.
- Strengthen requirements for DDA-compliant on-street disability parking.
- Resolve conflicting views on kerbside hierarchy with Council and clearly outline implementation responsibilities for any new frameworks.

Cheltenham Precinct-Specific Issues

- Address the 4.2m clearance constraint with the bridge on Bay Road as a key freight movement issue.
- Reclassify Nepean Highway and other roads in line with their actual strategic significance.
- Delivery of a continued Shared User Path (SUP) connection between Jean Street and Heather Grove is needed.

Clayton Precinct-Specific Issues

- Prioritise public realm upgrades and improved pedestrian environments along Centre Road and Clayton Road.

- Enhance active and public transport connections between SRL, Monash University, Clarinda, and surrounding neighbourhoods.
- Prioritise upgrades to the Knight/Centre Road intersection.
- Resolve the unclear delivery strategy for key East-West and North-South links, such as Meppel Drive, Knight Street and Audsley Street corridors.

5. Community Infrastructure

General

- The Structure Plans/PSAs lack direction on the future provision of kindergartens, including whether KISP population figures will include SRL projections, and how early planning for new facilities will be coordinated.
- There is no reference to the anticipated need for new schools. If school provision is expected, this must be space planned now.
- The omission of childcare from infrastructure typologies is problematic. While it is often privately delivered, its close link to kindergarten services justifies its inclusion in the planning framework.
- The proposed metric for Maternal and Child Health (MCH) is insufficient. At least two consulting rooms should be required for operational efficiency and staff safety, not “1-2 spaces.”
- The documents frequently refer to generic “neighbourhood houses” and “creative spaces” rather than naming actual facilities, leading to confusion and limiting strategic clarity.
- Clarify how population forecasts align with projected dwelling supply, particularly where forecasts exceed Council’s .id projections.
- Strengthen guidance around co-location and clarify whether this will reduce the need for additional facilities or require investment in upgrades. If so, examples beyond sport are needed.
- There is no clear strategy or implementation mechanism for the delivery of residential aged care or independent living, despite policy support for ageing in place.
- Funding for the provision of community infrastructure needs to be resolved prior to the gazettal of the PSAs to ensure collection of development contributions fairly occurs from the outset.

Cheltenham Precinct-Specific Issues

- Land use decisions for community infrastructure must prioritise suitability over ownership. Council does not support giving priority to Council-owned sites over Crown or state-owned land.
- Sir William Fry Reserve should be prioritised for delivery of a community hub, consistent with Council’s long-standing advocacy.
- The Cheltenham Community Centre should be correctly identified as a funded Neighbourhood House, and its long-term planning needs, including potential relocation to a Council-owned site, should be considered.
- A preferred library or community hub site should be identified within the station masterplan area; Highett is not considered appropriate.
- Several important facilities are omitted from mapping, including Cheltenham Hall, Kingston Heath, Le Page, Mentone Reserve, Walter Galt, Southern Road Reserve, and Waves Leisure Centre.
- Cheltenham Library should be confirmed as being located in the Central Core, not described as a “potential” site.

- Terminology such as “creative spaces” or “current community hubs” should be replaced with proper facility names.
- Mapping should clearly identify which facilities are located outside of the Kingston boundary, particularly those relied upon to meet local demand.

Clayton Precinct-Specific Issues

- The omission of Kingston Health from mapped infrastructure is a notable gap and should be rectified.
- Forecasts for both population and dwelling growth in Clayton must be explained in relation to infrastructure needs.
- A portion of the site at 1400 Centre Road, which is located within the designated SRL strategic site, should be identified for community infrastructure opportunity, particularly given its adjacency to recent apartment development.
- Additional clarity is needed regarding community infrastructure in the area around Centre Road and Lomandra Drive.

6. Open Space

- The PSAs should identify locations, size, function and purpose for open space and a funding mechanism.
- The PSAs should quantify and identify the location of lost open space at Sir William Fry from the station buildings and infrastructure.
- The recreational importance of Sir William Fry Reserve should be highlighted as there are no sporting facilities within the Structure Plan area.
- The Gasworks site must identify sufficient open space for the new population.
- The development parcels in the Cheltenham station environs must be offset with open space of an equivalent size and function.
- The offset for the Delta site to deliver Kingston Fields will become increasingly important.
- There is concern over assessment of open space and the adopted provision ratio. Sufficient open space must be provided, opening access to private open space is not considered as an acceptable solution.
- A broader approach for open space assessment should be made including for regional and district open space and existing open spaces on the periphery of the precinct boundaries.
- Open space demand generated by employment uses must also be considered in open space assessment.

7. Recreation

- The recreational needs assessment needs to speak to the open space assessment.
- Kingston’s adopted provision ratios need to be used.
- Regional facilities need to be included as part of the assessment.
- Absent detailed assessment of existing sporting fields.
- Opportunity for Kingston Fields to meet projected demand for sporting facilities.

- Assessment concerns such as the inclusion of privately owned golf courses in recreation assets and reliance on Shared User Agreements and interchangeable reference to structure plan area and precinct catchment.
- Funding for the additional recreational facilities must be resolved prior to gazettal of the PSAs.

8. Urban Design & Street Typology

Strategic Alignment and Consistency

- Ensure consistency between technical studies, Structure Plans, and Planning Scheme Amendments (PSAs), particularly for height strategies, FAR, setbacks, overshadowing, and interface guidelines.
- Clarify and justify built form assumptions and demonstrate development feasibility for both consolidated and unconsolidated conditions.
- Include preferred neighbourhood character statements in the PSAs to assist with discretionary assessment.
- Provide 3D built form modelling and site-specific testing (for built form, solar access, tree canopy, site coverage, etc.) to validate key controls.

Floor Area Ratio (FAR), Site Coverage and Overshadowing

- Further test and justify the FAR and incorporate it into the Structure Plan and PSAs.
- Provide rationale for varied site coverage rates.
- Consistently apply overshadowing benchmarks and explain differences in application.

Built Form Controls and Interface Design

- Clarify definitions of low-rise, mid-rise and high-rise, and apply them consistently.
- Strengthen public realm interface controls, including active frontages and minimum ground floor heights.
- Provide clearer guidance for podium and tower relationships.

Site-Specific Amenity and Design Quality

- Include guidance to ensure:
 - Solar access and ventilation are orientation sensitive.
 - Design allowances for canopy tree success.
 - Internal amenity is addressed for high-density forms.
 - Increase building separation to align with more contemporary applications.
- Address interface conflicts between 0m and 4.5m setbacks, and mid-rise/low-rise transitions.

Strategic Sites and Design Review

- Ensure all strategic sites receive appropriate built form guidance.
- Provide stronger masterplan guidance for large or complex development sites.
- Clarify the governance framework for Design Review Panels.
- Provide a clear implementation plan for 'flexible' links.

- Clarify decision-making discretion where appeal rights are removed.

Cheltenham Precinct-Specific Issues

- Conduct built form and amenity impact testing for significant height transition areas.
- Clarify how setbacks and building separation apply in the Central Core and along key corridors
- Provide cross-sections along Bay Road that reflect topography and interface expectations.
- Ensure Gasworks and Southland sites are assigned development typologies and controls.
- Provide clearer guidance on the expectations for built form in the Central Flanks.
- Prevent “wedding cake” outcomes along fine-grain streets by refining upper-level setback controls.
- Ensuring the street wall heights do not compete with the prominence of Southland.

Clayton Precinct-Specific Issues

- Protect amenity for constrained lots through clear overshadowing and interface standards.
- Correct mapping errors and update associated height controls.
- Clarify the intent and impact of new controls for Jackson Green and First Street precinct.

9. Public Realm & Street Typology

General

- Prepare feasible and clear concept cross-sections for all individual streets with a nominated ‘street typology’ that balances multiple functions including movement, greening, public life, utilities, and urban cooling.
- Develop tailored guidance for public realm upgrades, street typologies and key links reflecting real-world constraints.
- Include minimum widths, design expectations and delivery mechanisms for all identified “key links”.
- Assign clear delivery and funding responsibilities for aspirational cross-sections and public realm improvements, especially where Council would otherwise bear costs. Funding mechanisms should be in place prior to gazettal of the PSAs.
- Clarify how proposed changes will be achieved in DTP-managed corridors.
- Address gaps in the function of Green Street typologies and expand to include active transport.
- Clarify key corridors transformation station.
- Require weather protection for key connection nodes and active transport corridors.

Cheltenham Precinct-Specific Issues

- Introduce gateway treatments to strengthen the Highett Shopping Village entrance from Nepean Highway through landscape, built form, or public art.
- Clarify if and how the Avenue concept applies to the full length of Bay Road.
- Identify Southland laneway interfaces and provide built form/public realm guidelines to ensure active and safe interfaces.
- Apply strategies to Cheltenham to improve vibrancy and activation outcomes.

Clayton Precinct-Specific Issues

- Include Kombi Street and Haughton Road/Main Road as 'Green Streets'.

10. Canopy Coverage & Urban Greening

- Replace vague terminology such as “optimise canopy cover” with clear, measurable requirements for greening outcomes.
- Provide stronger, enforceable mechanisms to achieve canopy coverage targets:
 - 30% canopy coverage in parks and reserves.
 - 20% coverage across all land tenures within the Structure Plan area.
- Ensure setbacks (front, side, rear) are adequate for deep soil zones and are protected from basement encroachment.
- Address challenges to canopy cover in constrained areas by requiring green roofs, vertical greening and other green infrastructure in areas where deep soil planting is not feasible.
- Urban Greening Plan should be a requirement of all Precinct Zone schedules.
- Incorporate greening guidelines into street typology guidance.
- Acknowledge the implementation challenges on DTP Head, Transport for Victoria-managed roads and include actions to:
 - Review DTP's tree planting policies.
 - Enable planting of large canopy trees through barrier installation and updated safety standards.
- Expand the scope of greening strategies to include urban cooling, green infrastructure, and resilience planning:
 - Set targets for non-canopy greening strategies, including vertical greening and green infrastructure.
 - Reference heat vulnerability mapping and align greening priorities with areas of greatest urban heat impact.
- Ensure funding is allocated to planting, establishment and maintenance phases.
- Require greening objectives through stronger language in both Structure Plans and planning controls.
- Avoid over-reliance on greening in public open space to compensate for underperformance elsewhere to ensure a balanced and distributed approach.

11. Sustainability

- Add specific wording to the Planning Scheme Amendment that refers to net-zero or net-zero strategies.
- Objectives around embodied carbon reduction in new developments needs to be translated into the Structure Plan and Planning Scheme Amendment.
- Include Sustainability Management Plans for smaller developments.
- Waste management plans should be required for all development scales for construction and operational waste management.

- Broader objectives and targets relating to climate risk and resilience should be included in the Structure Plan and PSAs.
- Construction energy use should be included given there are construction and operational waste management targets.

12. Integrated Water Management

- Clarify the roles and responsibilities of authorities in IWM and flood mitigation, including Council's role in setting on-site stormwater detention (OSD) objectives.
- Acknowledge that many proposed IWM solutions (e.g. installing recycled water, passive tree watering, stormwater harvesting) are not feasible in highly urbanised areas without significant investment and structural changes.
- Strengthen the PSAs to enable a mix of on-site treatment and off-site in-lieu contributions, supported by mandated maintenance provisions.
- Revise assumptions around runoff diversion into nature strips as this is not practical without road reconstruction and must be reflected in the report's assumptions.
- Expand the risk assessment to include feasibility of treatment, retrofit costs, maintenance risks in private development, and enforceability through planning controls.
- Address existing flood issues more directly.
- Update IWM Strategy Objectives (particularly 11, 14, and 23) to support SEW's business case and include flood detention infrastructure.
- Include clearer, evidence-based water demand estimates to support recycled water delivery.
- Strengthen the narrative around IWM's role in urban cooling, liveability, and greening to reinforce its importance beyond drainage.
- DEECA's new IWM Planning Guidelines should be incorporated.

13. Economy

Cheltenham Precinct-Specific Issues

- Rising land values and rents risk displacing existing small-to-medium businesses, mechanisms to retain economic diversity should be considered.
- The station precinct's designation as the sole 'precinct core' area limits integration with nearby precincts. The precinct should be planned with the consideration of smaller centres on broader context and create better connections both physically and strategically.
- Improved pedestrian connections with weather protection and wayfinding are needed to link SRL Cheltenham Station with Southland Station, Southland Shopping Centre, and Charman Road.
- Freight movement conflicts with consumer vehicle movement in residential areas, which must be addressed through a coordinated logistics and movement strategy.
- The Structure Plan must account for the scenario if Westfield Southland limits investment to its current footprint only, to avoid disconnected outcomes.
- Upgrade and future-proof Bay Road between Jack Road and the railway line to support growing business centres.
- Ensure Southland Shopping Centre evolves to deliver active, outward-facing frontages.

- Plan for a complementary relationship (rather than competitive) between Southland and Bayside Business District to avoid over-saturation and business displacement.

Clayton Precinct-Specific Issues

- Align the Structure Plan and PSAs more closely with the Kingston Economic Development Strategy.
- Diversify the economic base beyond health care to support resilience and attract a diverse workforce.
- Protect and intensify Clayton South's existing industrial land (i.e. Audsley Street Industrial Area) as a key local employment precinct.
- Incorporate planning for supporting industries (e.g. accommodation, student housing, etc) linked to Monash Health and Monash University.
- Review the ground floor commercial activation requirements along Centre Road to avoid increased vacancy and poor amenity outcomes.

14. Amenity Impacts

- The Wind Technical Report must:
 - Include higher-altitude analysis relevant to Moorabbin Airport and aircraft operations, rather than only focusing on pedestrian height (1.5m).
 - Reference relevant case studies for wind mitigation, compare modelling techniques, and include a section on limitations and uncertainties.
 - Clarify which wind exceedance mitigation recommendations are mandatory versus best practice.
- The Noise and Vibration Report should not assume all existing development is compliant and should address actual usage patterns. Baseline noise and vibration surveys should be undertaken to support accurate modelling and impact assessment.
- Adopt a consistent approach to aircraft noise impacts using AS 2021:2015 and ensure future occupants are aware of potential noise exposure.

15. Utilities

- Future utility upgrades are discussed in high-level terms only. Detailed augmentation plans are missing.
- Existing services, which are in the current properties/easements from impacted land that will need to be relocated to road reserves, and any new services proposed in the road reserve, will impact the infrastructure design, road pavement, and nature strip functionality of road reserve.
- The utilities demand from the projected growth in population, employment and dwelling would be likely to exceed the current N-1 capacity.
- It is unclear whether future developments within 1.6km of the SRL station will be required to deliver or contribute funding necessary for utility infrastructure upgrades.
- Drainage infrastructure is not addressed in the Utilities Technical Report.