

Draft Southern Metro Land Use Planning Framework

Outline and Response – Mornington Peninsula Shire Council 25 October 2021

Background

Plan Melbourne, the State Government's Metropolitan Planning Strategy, first adopted in 2014 and last updated in 2017, provides an overall plan for the future land use and development pattern of metropolitan Melbourne. For the purposes of more detailed planning, Plan Melbourne also divides the metropolitan area into six "regions", as shown in Map 1 below. The Southern Metro region includes the municipalities of Kingston, Frankston, Cardinia, Casey, Greater Dandenong and the Mornington Peninsula.

One of the priority actions included in the revised Plan Melbourne was the development of a Land Use Framework Plan (LUFP) for each region. Following a long period of development, a draft LUFP for the Southern Metro region has now been released by the State government Department of Environment Land, Water and Planning (DELWP) for public comment (see Engage Vic: <https://engage.vic.gov.au/mfpf/southern-metro-lufp>).

MAP 1 Metropolitan Melbourne regions



Metropolitan Melbourne regions and local governments

The Southern Metro LUFP basically reinforces the directions of Plan Melbourne, which include:

- Investment in city shaping infrastructure with a view to reshaping Melbourne as a "polycentric city" – that is, to increase the role of other major centres in the metro region – such as Clayton/Monash, Dandenong and Frankston, so that more activity occurs in

these areas, to some extent reducing the focus on the Melbourne CBD, and thereby reducing the congestion pressures on the central area.

- Consistent with this approach, the LUFP indicates that it aims to promote a “regional focus”, that is a greater level of regional self-sufficiency in terms of access to employment, housing and major services. This approach to “decentralisation” may be even more relevant in a post COVID environment.
- A ‘systems approach’ to infrastructure investment. In other words investment in infrastructure, such as the rail crossing removals and the major rail projects (Melbourne Metro and the Suburban Rail Loop) that have a local benefit, particularly when combined with new activity centres, but are also intended to increase the capacity of the existing system as a whole – enabling “smarter” management of the network– and gaining greater efficiency. An emphasis on efficiency gains is also emphasized in the draft 30 year Infrastructure Strategy recently released by Infrastructure Victoria, with policies such as congestion charging designed to manage demand and increase capacity rather than rely on major new infrastructure projects.
- A focus on urban consolidation. Plan Melbourne aspires to locate 70 % of new housing growth in established areas and 30 % in new Growth Areas. Again, the principle is to achieve greater value from the existing public investment in established urban areas, as well as provide a greater range of housing choice, particularly for the increasing number of smaller, older households.
- Employment growth based on locations with an established base and/or competitive advantage, such as the National Employment and Innovation Cluster co-located with Monash University at Clayton.
- Urban consolidation is particularly focused around the Metropolitan Activity Centres (Dandenong, Frankston, Fountain Gate) and major activity centres, as well as National Employment and Innovation Clusters (Monash/Clayton and Dandenong). This “co-location” of employment and housing aims to achieve “jobs closer to home” (or homes closer to jobs), reducing pressures on the transport system and is one of policies aimed at increasing liveability, enabling people to access their daily needs with a relatively short travel time i.e. 20-minute neighbourhoods.
- Significant public transport investment (particularly in rail) to support future major employment centres. The Suburban Rail Loop, with Cheltenham as a key interchange will enable travel between a “ring” of locations in suburban Melbourne without the need to travel into the CBD.
- Continuing planning for designated Growth Areas. While Plan Melbourne 2017 -2050 emphasizes urban consolidation, the level of projected growth and the objective of maintaining a 15-year land supply (in part to moderate pressures on housing affordability) result in a continuing expansion through designated growth areas. Planning in these areas is largely guided by precinct structure plans (PSPs) developed by the Victoria Planning Authority and the relevant Councils.
- A clear commitment to maintaining the Urban Growth Boundary and protection of Green Wedge areas, both on the basis of the value of the Green Wedge areas for agriculture, conservation, recreation and tourism, as well as to prevent inefficient urban sprawl.

In this context the Southern Metro Land Use Framework Plan is intended to:

- Provide a 30-year strategic vision for the region
- Shape population and industry growth
- Inform plans for service and infrastructure development
- Guide public and private investment
- Protect the distinctive and historic characteristics of the Southern Metro Region; and
- Improve environmental resilience

The draft LUFP itself is structured around six key themes: productivity, housing choice, integrated transport, liveability, strong communities and sustainability and resilience.

The Plan includes 31 directions, 100 strategies and 20 proposed actions, as well as a draft initial implementation plan outlining intended actions in the short (0-2 year) and medium (2- 5 year) timeframe.

Discussion

The profile and context sections in relation to each theme included the LUFP provide a good snapshot of the southern metro region and some of the key land use and transport planning challenges. A key positive aspect is that the draft LUFP largely supports the existing strategic directions and policies that have recognised the important role and values of the Mornington Peninsula since at least the mid 1970's.

That said, as a regional plan the LUFP is arguably unable to address the important issues of particular sub regions and municipalities in any great detail and, at least in relation to the Mornington Peninsula, the LUFP does not appear provide any substantial additional direction or commitment on a number of key issues.

In this sense, it is not clear that the document achieves the aim of providing a 30 year strategic vision, rather it appears to be more a re-statement of Plan Melbourne and a “plan for a plan” (or plans) yet to be developed. A comparison between the Plan Melbourne 2050 Plan (see Map 2) and the LUFP 2050 Plan (Map 3) indicates very little difference in the level of detail.

In this context, this response focusses on the implications of the draft LUFP for the Mornington Peninsula and seeks to highlight where further work is required in relation to each theme to provide a 30-year framework that is relevant to the needs of the Peninsula.



Map 2

Melbourne 2050 Plan

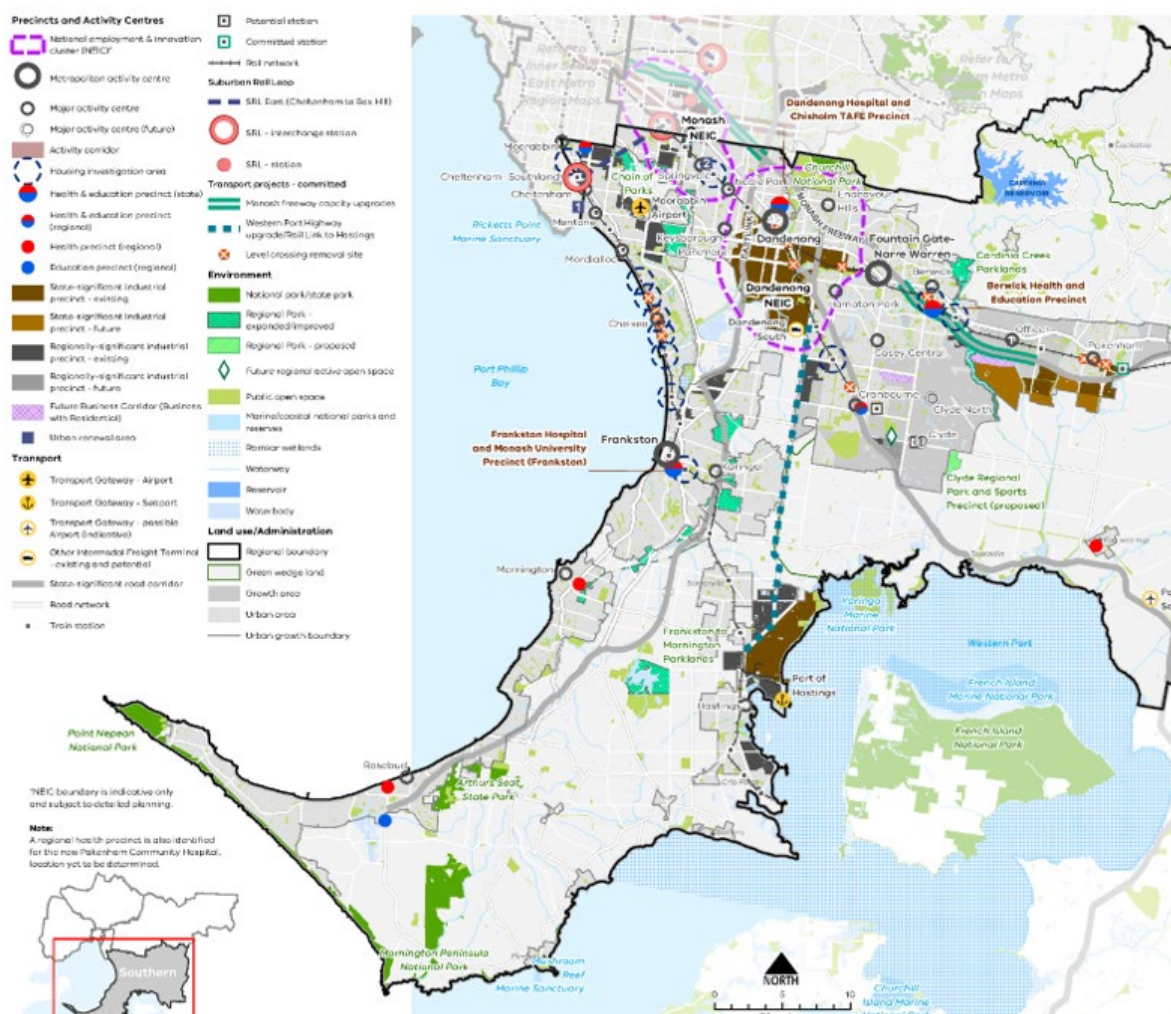
- | | |
|---|--|
| Central city | Potential transport infrastructure project |
| National employment and innovation cluster (NEIC) | Outer Metropolitan Ring / E6 reservation |
| Metropolitan activity centre | North East Link (alignment subject to investigation) |
| State-significant industrial precinct | Airport Rail Link |
| State-significant road corridor | Avalon Rail Link |
| Rail network | Western Port highway upgrade / Rail Link to Hastings |
| Rail improvements Sunbury to Cranbourne / Pakenham (including Metro Tunnel) | Interstate freight terminal (indicative) |
| Western Distributor | Transport gateway - possible airport (indicative) |
| Transport gateway - major airport | Transport gateway - possible seaport (indicative) |
| Transport gateway - airport | Water's edge parklands |
| Transport gateway - seaport | Green wedge land |
| | Urban growth boundary |
| | Urban area |
| | Waterway |
| | Waterbody |
| | Metropolitan Melbourne region |

Source:
Department of
Environment, Land,
Water and Planning



NOTE: POTENTIAL INFRASTRUCTURE PROJECTS AND GATEWAYS ARE SUBJECT TO INFRASTRUCTURE VICTORIA ADVICE AND VICTORIAN GOVERNMENT APPROVAL. THIS FRAMEWORK WILL BE UPDATED AT THE END OF 2017, FOLLOWING THE GOVERNMENT RESPONSE TO INFRASTRUCTURE VICTORIA'S 30 YEAR PLAN.

Map 3 Southern Metro Region 2050 Plan



Productivity

The LUFPP outlines that future employment growth in the Southern metro region will be based on a combination of:

- Investment in the National Employment and Innovation Clusters (NEICs) at Dandenong and Monash.
- A focus on retail and commercial growth the Metropolitan Activity Centres, Major Activity Centres and identified business precincts, and
- Further industrial development, particularly in the State significant industrial areas (SSIPs) and regionally significant industrial areas, notably in proximity to the Officer/Pakenham growth corridor and at Hastings.

Unfortunately, the discussion in relation to the future of the Hastings Port Area (including the land around Crib Point), the Hastings SSIP and the area classified as “regionally significant industrial land” is ambiguous and may inadvertently encourage speculation and land banking.

In part the LUFPP continues to state that “the capacity for the Port of Hastings to become a major container port if required has significant potential to bring investment to the region”.

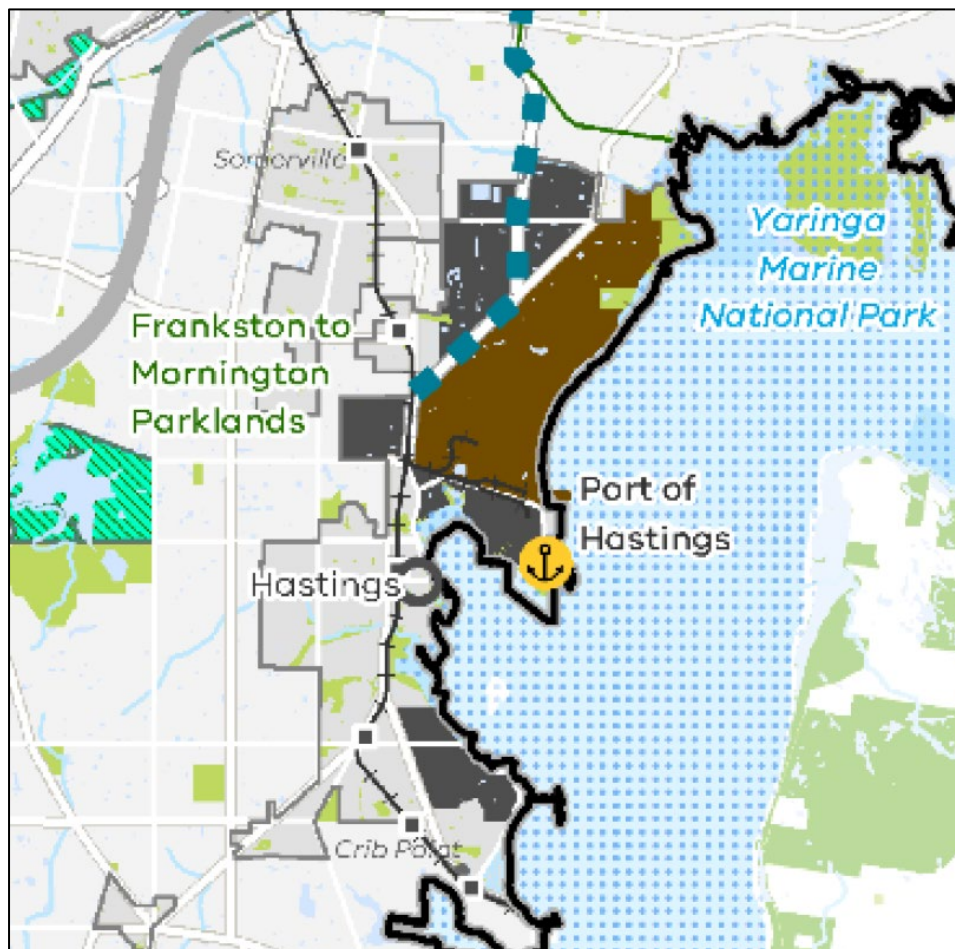
This is in contrast to clear government directions that Bay West is the preferred location for a second container port, and even then (as per Infrastructure Victoria's recently released draft 30 year infrastructure strategy), there is no intention to plan for a second container port for approx. 40 years).

The LUFP then proposes (Action 3) that the Department of Jobs, Precincts and Regions (DJPR) in consultation with the Port of Hastings Development Authority and Mornington Peninsula Shire Council, investigate the potential for any Special Use Zone 1 land outside of the Hastings State Significant Industrial Precinct (at Tyabb, Hastings and Crib Point) that could allow for a broader range of industrial uses while still providing adequate buffers for the growing port.

However, even the boundaries of the Port precinct are uncertain, given that a major part of the port precinct, south of Bayview Road and including a major reclamation area, appears to be subject to a different classification to other parts of the port precinct. Equally, it is not clear whether the LUFP is recommending a review of the (surplus) land inside the Hastings SSIP, the regionally significant land outside the SSIP, or both.

-  State-significant industrial precinct - existing
-  State-significant industrial precinct - future
-  Regionally-significant industrial precinct -
-  Regionally-significant industrial precinct - future

Map 4 - Hastings Port Industrial Area



More significantly, while the very limited release of some land in the SUZ1 zone has been supported in Council's Industrial Land Assessment and Rezoning Strategy (ILARS 2020) it is important to emphasize:

- The original decision to reserve land in this area for port related uses was justified (in the early 1970's) as necessary, despite environmental impact concerns, on the basis that land with access to a deep-water channel was a scarce strategic resource of State significance, and
- Based on the Western Port Bay Environmental Study in the 1970's, the intended use and development model was of large scale port related uses occupying substantial sites that would control their impact on the surrounding environment and have a very limited footprint on Western Port coastline – with Blue Scope being the clear example.

Any move away from this port related “limited footprint” development model raises critical questions regarding the potential social, economic and environmental impacts and benefits of a new land use and development strategy for the area.

Simply assuming that land that was designated for the highly specialised purpose of port related uses in the 1970's should be converted to general industrial use in 2021 without further fundamental consideration of changes over the last 50 years is premature (to say the least). Some of the key questions that need to be considered include:

- Is industrial use really the most appropriate activity across the whole of this area – if it is no longer required specifically for port related industry.
- Should all or part of the area be included in the Green Wedge with priority to strategic agricultural land?
- Should parts of the area be reserved or at least given greater protection for their environmental values?
- Should all or part be considered for land use and development which will reinforce the “Green Port” concept – or energy transition objectives?
- What are the appropriate environmental limits to future port development on Western Port – what will effectively constitute a Green Port – that is, one which maintains the environmental values of the area, in the context of the sensitive Western Port environment?
- What is the infrastructure investment plan to support development of the Hastings SSIP and Port Area – including future road and rail connections. What is the commitment to sequencing of development and funding of infrastructure to avoid impact on surrounding communities and the environment?
- What is the “design framework” for the area – ranging from the possibility of designating specialised precincts to the design of major infrastructure/transport corridors?

Given the above, it is clear that this area requires a comprehensive and strategic review by the State government, led by DELWP in conjunction with Council and the Port of Hastings Development Authority, and with a full community consultation process, including the potential for an independent review of submissions and recommendations. This should include full consideration of the social, economic and environmental impacts of alternative use and development options. It is not simply a question of replacing one industrial zone with another.

In this regard it is quite possible that the most appropriate use for parts of the SUZ1 area, if not required for port related use, may be biodiversity conservation or agriculture, noting that the potential for use of recycled water in this area is included in the sustainability and resilience section of the LUPF.

Recommendation 1

That DELWP be advised that Council does not support proposed Action 3 in its current form and instead recommends that the State government undertakes a comprehensive and strategic review of the Hastings SSIP and adjoining areas currently included in the SUZ1, with full consideration of the potential social, economic and environmental impacts and benefits of alternative use and development options. The review process should be led by DELWP, in conjunction with Council and the Port of Hastings Development Authority, and with a full community consultation /engagement process, including the potential for an independent review of submissions and recommendations.

A further section of the Productivity section refers to the role of different Metropolitan Activity Centres and Major Activity Centres in the southern region.

This section is generally consistent with existing policies, designating Hastings, Mornington and Rosebud as the only Major Activity Centres on the Mornington Peninsula. However, it is important for the LUPF to maintain consistent terminology – for example, by consistently referring to Hastings as a Major Activity Centre rather than a “higher order service centre” (p.50) and should also avoid creating ambiguity in relation to agreed strategies, such as the Mornington Peninsula’s Housing and Settlement Strategy.

In this regard, the strategic opportunity in Mornington to “Support appropriate increased residential densities within and on the fringe of the activity centre” [p.52] may beg the question of defining the “fringe” and would be better expressed by stating: “Support appropriate increased residential densities within and on the fringe of the activity centre in accordance with the Mornington Peninsula Housing and Settlement Strategy Refresh 2020 - 2036.

This section of the LUPF also indicates the location of state significant and regionally significant health and education precincts, with Strategy 19 being to: ensure the specialised functions of health and/or education precincts are reinforced, and plan for their development and expansion which will also see an increase in demand for retail, commercial and accommodation uses”. There are two regionally significant health “precincts” noted on the Mornington Peninsula – at Rosebud (the Rosebud hospital) and Mornington (the Bays Hospital) and only one regionally significant education cluster (being the Rosebud TAFE).

However, despite the strategy, there is no particular commitment to support for these regional precincts, for example in terms of funding for public transport services or the development of state government service clusters based in these locations. While the fact that these significant facilities exist is worth noting as part of the current “snap shot”, the designation of an area as “regionally significant” in itself has limited value. There should at least be reference in the strategy to the consideration of co-location by relevant state service agencies and provision of public transport services to support the function of these precincts.

Recommendation 2

That DELWP be advised that Council considers the designation of Hastings, Mornington and Rosebud as Major Activity Centres to be consistent with Plan Melbourne, but would highlight the need for consistent reference to Hastings as a Major

Activity Centre (p.50) and that the strategic opportunity relating to Mornington in regard to future housing (p.52) should be expressed as to: “Support appropriate increased residential densities within and on the fringe of the activity centre in accordance with the Mornington Peninsula Housing and Settlement Strategy Refresh 2020 - 2036.”

Recommendation 3

That DELWP be advised that in regard to strategy 19, referring to regionally significant health and education precincts, Council considers that it is important to include the potential to strengthen these precincts through state government investment decisions and the strategy should include consideration of co-location by relevant state service agencies and provision of public transport services to support the function of these precincts.

The productivity section of the LUPF also includes directions for land use in the Green Wedge, generally emphasizing (for the Mornington Peninsula) the importance of biodiversity conservation, agricultural production, ecotourism and agritourism. While this consistent with the well-established policies for the Mornington Peninsula, including the Mornington Peninsula Localised Planning Statement (2014), the LUPF makes very limited reference to Green Wedge Management Plans and their role in managing competing and potentially conflicting land uses.

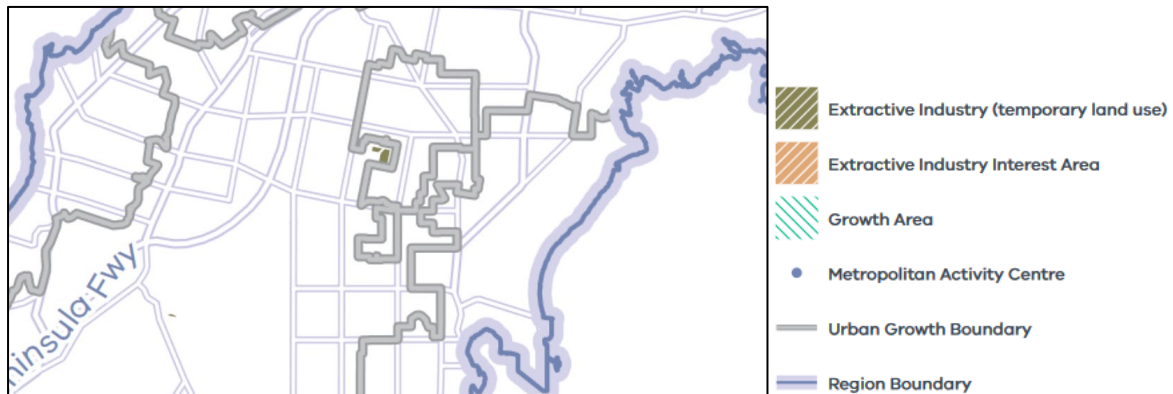
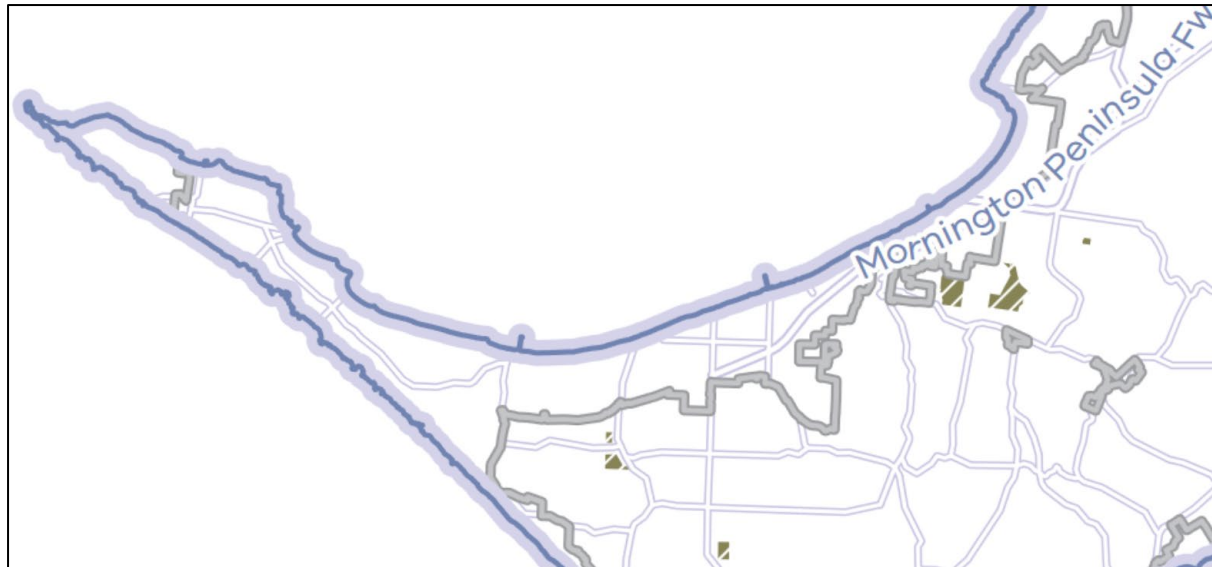
In its submission to the consultation paper released by DELWP on Planning for Melbourne’s Green Wedges and Agricultural Land (P4GWAL 2020) Council proposed that once approved by the Minister, each Green Wedge Management Plan should be regarded as the primary policy document for that Green Wedge area, in the same way that Statements of Planning Policy operate for designated Distinctive Areas. While the Minister’s response to the P4GWAL submissions is yet to be released, it is considered that greater recognition of the importance of the Green Wedge Management Plans in managing competing uses in the Green Wedge would strengthen the LUPF.

Recommendation 4

That DELWP be advised that the section of the LUPF referring to future land use in Green Wedge areas (Direction 6 , Strategies 21 – 25) should refer to the importance of the Green Wedge Management Plans (as outlined in the Plan for Melbourne’s Green Wedges and Agricultural Land consultation paper) and support their development as the primary planning document for each specific Green Wedge area.

Finally, it may be noted that although extractive industry is discussed in the LUPF, with some directions in relation to establishing future Strategic Extractive Resource Areas, there is no specific reference to extractive industry on the Mornington Peninsula other than mapping of eight existing sites as “Extractive industry (temporary land use)”, as shown on the maps below.

The mapped sites include the Hillview Quarry (Hillview Quarry Drive, Dromana), the ex-Pioneer Quarry site (also owned by Hillview Quarries, at 115 Boundary Road, Dromana, and which is currently subject to an EES process), the sand extraction site (410 Trueman’s Road, Fingal) and the clay extraction site on Pottery Road in Somerville.



It must be acknowledged that existing State planning policies strongly emphasize the protection of extractive resources and the draft LUFP also includes similar objective/strategies, including – (24) “Protect existing quarries from incompatible use, development and subdivision to maintain supply of extractive resources”; and (25) “Identify and manage long-term strategic extractive resources in the Southern Metro region”.

However, unlike in other Green Wedge areas, the LUFP does not include “Mineral, stone and resources” as part of the current role of the Mornington Peninsula Green Wedge nor “Ensure extractive quarry operations continue in appropriate locations to avoid resource shortages in the region and state” as a Future Role/Strategic Opportunity.

The discussion of extractive industries in the LUFP to some extent highlights the limitations of simply listing a range of potentially incompatible objectives without indicating what weighting will be given to different factors in an actual assessment.

It must also be emphasized that the ex-Pioneer/Hillview quarry site is not, in fact, an existing extractive industry site, in the sense that there is no current planning approval for extraction and the proposal to commence such a use is currently subject to an Environmental Effects Statement process. In this context it is considered inappropriate for the ex-Pioneer/Hillview site to be included on the map as it may be interpreted as pre-judging the outcome of that process.

Equally, while it would be inappropriate to seek to make statements regarding specific sites in the context of the current LUFP consultation process, the LUFP could include more explicit

recognition that the impact of extraction on landscape, heritage and conservation values, and on the amenity of surrounding communities, as well as the availability of alternative supply sources, must be given strong consideration in the assessing the net community benefit of any particular resource use/extraction decision. This issue also further reinforces the importance of Green Wedge Management Plans in providing direction for specific areas.

Recommendation 5

That DELWP be advised that the section of the LUFP (p.38/39) referring to Extractive industries:

- a) Should not include the ex-Pioneer/Hillview quarry site on the map of Extractive Industry Interest Areas (Figure 13 p. 43) as this site has no current approval to operate as an extractive industry site and is currently subject to an EES process. Any designation at this stage may prejudice proper consideration of this matter.**
- b) Should provide explicit recognition that the impact of extraction on landscape, heritage and conservation values, and on the amenity of surrounding communities, as well as the availability of alternative supply sources, must be given strong consideration in the assessing the net community benefit of any particular resource use/extraction decision.**

Housing choice

As per Plan Melbourne, the LUFP emphasizes the objective of directing a greater proportion of future housing growth to established areas – that is through urban consolidation and increasing housing densities. The Plan Melbourne objectives of providing greater housing diversity, ensuring adequate land supply and increasing the availability of social housing are also included in the LUFP.

An initial issue relating to the Housing choice section of the LUFP is the confusing presentation of the population and housing projections, with a mix of 2016, 2020, 2031, 2036 and 2051 figures.

The LUFP notes that the regional population is expected to increase from 1,128,650 in 2020 to 1,759,730 in 2051 (+ 631,080 – an annual increase of 1.4%) but then only provides housing projections to 2036, noting that Victoria In the Future (VIF - the key document outlining State government demographic and housing projections) does not include housing growth projections beyond 2036 as land supply, dwelling construction and population distribution become less certain beyond that timeframe.

It is reasonable to note the assumptions and limitations involved in all projections; however, the lack of consistency in the presentation of the population and housing data – referring back to 2016, mixing 2036 and 2051 projections etc prevents a clear picture of the housing “challenge” in the region and for particular municipalities.

While projections may become less reliable over longer periods, it is difficult to argue that the LUFP provides a 30 year vision if there is no clear position on longer term population and housing distribution, and on the basic question of whether there is sufficient capacity across the region to accommodate anticipated demand.

For example, using a conservative assumption that the proportion of the regional population on the Mornington Peninsula remains constant, and that the average household size

decreases only slightly (to 2.3 persons per household) it would be reasonable to produce the following 2051 estimates:

Southern Region (SR) pop 2020 (source: VIF 2019)	1,128,650
Mornington Peninsula (MP) pop 2020 (VIF)	168,860 (13.5% of the southern region pop.)
SR est. pop. 2051 (VIF)	1,759,730
MP est. pop. 2051	237,563 – assuming the percentage of the regional pop on the MP remains at 13.5%
Increase in pop. from 2020 to 2051	68,703 persons
Increase in the no. of households (hh) from 2020 to 2051 (assuming a household size 2.3)	29,870 hh
2019 total dwellings (VIF)	95,500
Total new housing demand 2019 - 2051	29,870 dwellings (assuming one dwg/hh) – no conversion of existing holiday homes)
2051 total MP dwellings (assuming one hh/dwelling and no conversion of holiday home stock to permanent occupancy)	95,500 + 29,870 = 125,370 dwellings (31.2 % increase over 31 years)

Having regard to these figures it is possible to confirm that Council's Housing and Settlement Strategy identifies sufficient long-term capacity to meet the anticipated demands, and a similar regional assessment would be useful.

The other major benefit of clarifying the data in relation to projected population and housing growth in the region and in each municipality, is that it would facilitate comparisons between and within regions, which should, in turn, inform consideration of the need for future funding of social and community infrastructure.

In this regard the LUPF continues to emphasize the need for services and facilities in designated growth areas, and while these are important it is also important to recognise the needs of established areas which are expected to accommodate substantial population growth. For example, as outlined above the population of the Mornington Peninsula is projected to increase by approx. 67,000 people and 30,000 households (31% increase) by 2051.

In passing, it may be noted that a similar comment could apply to the recently released Infrastructure Victoria 30 year Infrastructure Strategy, where there is only one direct reference to improving services on the Mornington Peninsula (supporting the introduction of premium bus services over the next five years). However, a range of recommendations to improve service levels in "regional areas" included in the Infrastructure Victoria report are arguably just as applicable to the Peninsula and other outer /interface municipalities.

The completion of a "neighbourhoods index" (Action 76 in Plan Melbourne and scheduled for 2021) that identifies the key characteristics of Melbourne's neighbourhoods (such as activity centres, schools, public transport, housing density and diversity, walkability and tree cover) would also provide an important resource for assessing the relative needs of different areas.

Recommendation 6

That DELWP be advised that extending the housing projections provided in the LUFP over the whole of intended 30 year planning period (even provisionally) would increase their value for the purpose of longer term planning for community facilities and services. In addition, completion of the proposed neighbourhoods index (Plan Melbourne Action 76) would support policies to implement the 20-minute neighbourhood objectives in established township/residential areas and should be included as a further action in the LUFP.

In addition to overall housing demand and supply projections the LUFP also includes directions to prioritise housing growth in areas with access to jobs, services and good public transport.

In accordance with Plan Melbourne preferred locations for medium- and higher-density housing in the Southern Metro region include: National Employment and Innovation Clusters, Suburban Rail Loop precincts, Metropolitan Activity Centres, Major Activity Centres, Urban Renewal Areas, Neighbourhood Activity Centres and Greenfield Growth Areas.

The LUFP (p.69) also refers to Housing Investigation areas as preferred locations, which are defined as “areas within an 800m walkable catchment around existing and future train stations that have the potential to support medium- and higher-density housing development in line with maximising access to public transport and 20-minute neighbourhood principles”.

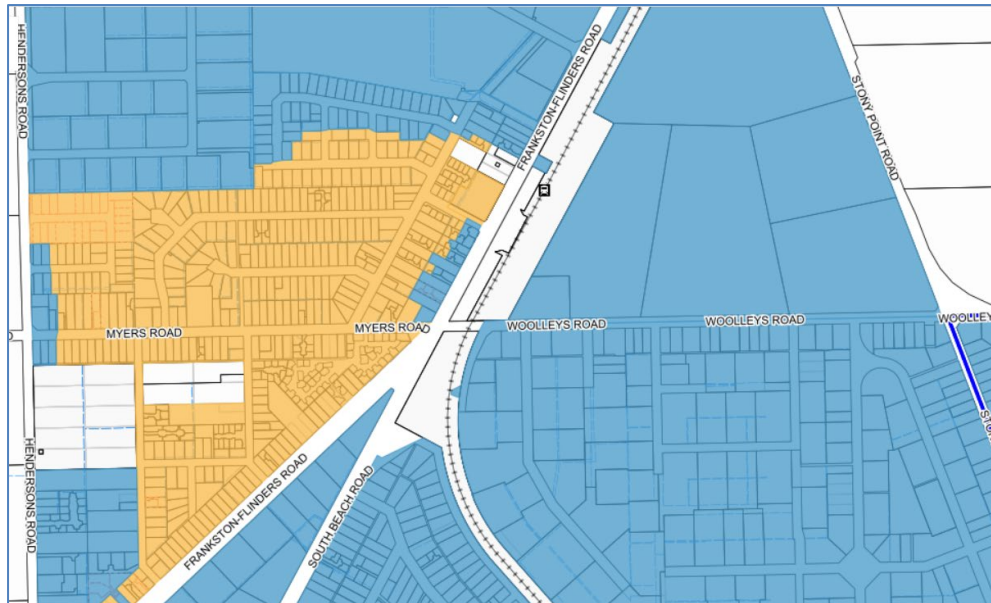
These areas are “outside designated metropolitan and major activity centres and are based on their access to rail infrastructure, existing zones that allow residential development and the absence of ‘special characteristics’ such as heritage, landscape, bushfire values or airport environs”. The relevant Strategy (Strategy 30 p. 70) is stated as to: Maximise development potential in housing investigation areas around existing and proposed train stations to leverage access to the Primary Public Transport Network (PPTN).

The LUFP also states that “a further assessment to determine locations within Housing Investigation Areas suitable for substantial housing change and rezoning, in response to the local context, will be required.”

While a review of the housing potential of land in proximity to railway stations is reasonable in itself, the only location designated as a Housing Investigation Area in the LUFP on the Mornington Peninsula is Bittern. There is no apparent rationale for this particular selection, apart from the existence of a station at Bittern. In addition, in regard to the need for a further assessment, this has, in effect, already been undertaken through Council’s comprehensive Neighbourhood Character Study and Guidelines (2019) and Housing and Settlement Strategy Refresh 2020 -2036 (the HSS).

The HSS identifies the residential areas in Bittern that are considered appropriate for either minimal or incremental change; (see image below – yellow for incremental change and blue for minimal change). No areas in Bittern were identified as being appropriate for substantial change. Following extensive consultation with DELWP, this framework has subsequently formed the basis for proposed planning scheme Amendment C219.

It may be noted that the minimal change areas in Bittern are affected by a Bushfire Prone Area classification. The residential areas to the east of the station are in the Low-Density Residential Zone with strong landscape values and subdivision controls that limit fragmentation of the existing large lots. Moreover, the railway line servicing the Bittern township is not part of the electrified metro. railway system, or the Principal Public Transport Network and the current diesel service is very limited in terms of service frequency and capacity.



Having regard to the previous assessment of Bittern, and the fact that the area considered appropriate for incremental change is already identified through the adopted Housing and Settlement Strategy, it is considered that Bittern should not be included on the list of Housing Investigation areas as this tends to undermine decisions based on the previous strategic work and the current C219 amendment process.

Recommendation 7

That DELWP be advised that, on the basis of previous work undertaken by Council through the Neighbourhood Character Study and Housing and Settlement Strategy Refresh, Bittern should not be included in the list of Housing Investigation Areas.

Finally, in regard to social and affordable housing, the LUPF notes that Victoria has the lowest proportion of social housing in Australia and will require 4,000 homes per year for Victoria's social housing stock to reach the national average, where social housing represents 4.2 per cent of the total number of dwellings.

In terms increasing public housing, the LUPF highlights that the Victorian Government's Big Housing Build program aims to increase existing social housing stock across Victoria by 10 per cent and that in the next five years over 12,000 new dwellings will be built.

However, this may be compared with the total estimated 25,000 applications on the existing public housing waiting list in the Greater Melbourne region (2018), which in itself is likely to be a far below the potential level of demand, with an estimated 75,000 to 100,000 disadvantaged low-income households in Victoria without access to affordable housing (Infrastructure Vic 2020).

Beyond the Big Build program, the main action (Action 6) to increase social housing supply appears to be through the identification of "underutilised and surplus" government land and "in partnership with councils" the identification of a "pipeline of sites" for social and affordable housing. In this regard, experience has indicated that government agencies are generally obliged to seek a commercial return on the disposal of surplus land, which tends to reduce the availability of such sites for social housing projects.

In addition to the question of the overall supply, only Casey and Cardinia appear to be designated as high priority areas for social housing development in the Southern region.

While the need for additional social housing in Casey and Cardinia as key growth areas is certainly significant it is important that social housing needs in other parts of the region are also recognised. For example, Council's Triple A Housing Plan 2020 – 2030 (adopted 21 April 2020) includes the aims of increasing the supply of social housing on the Peninsula (from approx. 1.6% of all stock) to a level that is at least equivalent to the State average (of 2.6%) and to work with other Councils in the region to establish agreed targets for social and affordable housing. This approach to regional planning for social housing should be supported by the LUPF.

Recommendation 8

That DELWP be advised that the proposed Action 6, involving the identification of underutilised and surplus government land as potential sites for social and affordable housing, needs to clarify that priority that will be given to this use over the direction to seek a commercial return which is often applied to the disposal of State government owned land.

Recommendation 9

That DELWP be advised that while Council recognises the need for additional social housing in the high growth areas of the region, the housing needs of local communities in other municipalities should also be recognised, and that there should be further work with Councils in the region on the development of specific, achievable and measurable targets for social and affordable housing and the mechanisms necessary to achieve them.

Integrated Transport

The LUPF recognises that the Mornington Peninsula is part of the region with least access to public transport services and high level of car dependency.

While the Shire is currently developing its own Integrated Transport Strategy, including a significant emphasis on supporting public transport services and reducing carbon emissions, there is little new at the regional scale included in the draft LUPF, except reference to improved “next generation” premium bus services (also flagged in the State’s bus plan and Infrastructure Victoria’s 30 year plan) which are intended to be delivered over the next 5 years.

In regard to rail infrastructure, the draft 2050 plan included in the LUPF still shows “Baxter Rail Upgrade” and “Upgrade Western Port Highway/Rail Link to Hastings”, which begs the question of whether these are intended to be commitments, proposals or options for investigation.

Equally, there is no plan or proposed timeframe for the resolution of a number of key transport issues on the Peninsula which have regional implications, including designation of an east/west freight connection from the Port of Hastings/Hastings SSIP to Peninsula Link, improved access to the Port Area, access to the southern Peninsula south of Rosebud or identification of the interchange locations necessary to support improved “rail like” bus services.

Recommendation 10

That DELWP be advised that the draft LUPF does not appear to address significant transport issues facing the Mornington Peninsula which are relevant to its regional role including access to the Port Area, reservation of future port rail corridors and the designation of an east west connection between the Hastings State Significant

Industrial Precinct and Peninsula Link, access to the southern Peninsula south of Rosebud as a major tourism and recreation area, support for improved rail services to Hastings and provision for implementation of “premium” bus services, necessary to support the growing population. The LUFP should at least outline a process to address these issues in a reasonable timeframe.

Liveability.

This section of the LUFP is primarily focussed on protection of the Green Wedges, open space and trails, heritage and place making/urban design. It largely reinforces the role of the Mornington Peninsula Green Wedge, noting that the entire Mornington Peninsula is designated as a landscape of state significance and protected through a Localised Planning Statement incorporated into the Planning Scheme. The plans also indicate that a high proportion of the Victorian Heritage Register (VHR) heritage sites in the southern region are located on the Mornington Peninsula.

However, aside from reference to the Frankston – Mornington Parklands concept (with a potential trail link along the Mornington rail line reserve), the LUFP does not include any proposal to provide new visitor/recreational infrastructure or address the ongoing costs of maintenance (compounded by the effects of coastal climate change), necessary to support the increasing recreational role of the Peninsula, whether this is on the coast, in the Green Wedge, or in maintaining heritage sites. While these factors may to some extent be addressed by grant programs etc, the substantial costs of providing “liveability services” to the growing regional population should be better recognised.

A particularly critical issue for the Mornington Peninsula is the role of the Green Wedge in providing for regional recreation and opportunities for tourism in a way that is consistent with protecting conservation values, rural landscape character and maintaining agricultural land use. State government support in the development of recreation plans and tourism location frameworks would assist in resolving a number of the ongoing issues in relation to these activities.

In this regard, as previously noted there is very limited reference to the role of Green Wedge Management Plans (GWMPs) and the role these documents can play in future integrated planning for each Green Wedge area.

Finally, although the focus of the LUFP is not on biodiversity conservation and habitat restoration per se, there appears to be a lack of emphasis on the opportunities to establish biodiversity corridors and habitat restoration areas (other than as part of Growth Area planning) and the potential links with the State government’s Biodiversity 2037 strategy.

With the imminent merger of the Port Phillip and Western Port Catchment Management Authority and Melbourne Water, there may be new opportunities for funding of environmental and habitat restoration, in locations such as the Western Port and Tootgarook Wetlands and the LUFP should recognise and advocate for these opportunities.

Recommendation 11

That DELWP be advised that Council supports the focus in the LUFP on the significance, protection and management of Green Wedge areas and the need to invest in regional parks, recreation facilities and walking and cycling networks. In this regard, the LUFP should also recognise the ongoing costs of providing and maintaining recreational infrastructure and consider potential mechanisms to provide for equitable funding from across the region.

Recommendation 12

That DELWP be advised that providing opportunities for recreation and tourism in a way that is consistent with protecting the rural landscape character and maintaining agricultural land use in the Green Wedge is a particularly critical issue for the Mornington Peninsula and that Council would seek State government support in the development of recreation plans and tourism location frameworks to avoid long term land use conflicts and ensure more sustainable development.

Recommendation 13

That DELWP be advised that the LUFP should include stronger reference to the potential links with the State government's Biodiversity 2037 strategy and the opportunities for biodiversity conservation and habitat restoration on the Mornington Peninsula and other areas in the Southern metro region.

Strong Communities

This section of the LUFP deals primarily with the community services required to address the needs of a growing regional population.

A limitation of the LUFP is that it tends to make general statements rather than fully reflecting the diversity of the region. For example, in regard to the strengths of the region, the report states that "... 20-minute neighbourhoods can be more easily achieved in the established areas which are well connected by public and active transport modes."

However, this statement clearly does not apply to many established areas of the Mornington Peninsula that lack public transport services. There is also a continuing focus on the social and community infrastructure needs of the growth areas.

This is not to minimise the need for proper provision in growth areas. However, it is also important to recognise the needs of existing communities, and areas with significant projected population growth that are not formally designated as growth areas, but which still require a proportionate level of funding to support community services and facilities, the provision of open space and active transport networks.

It is therefore important that recommendations in the LUFP are based on evidence relating to current service levels across a range of services – from public transport and social housing to health and education facilities and provide some commitment to decreasing the gap in already vulnerable communities.

In this regard, the oft cited perception of the Peninsula as a relatively affluent community facing low growth pressures needs to be adjusted to recognise that there are real pressures in parts of the municipality. Equally, it is also worth noting that the recently released Infrastructure Victoria 30 year strategy recommends the introduction of road pricing and congestion pricing which are likely to have a disproportionate effect on car dependent populations, such as those on the Mornington Peninsula, and such pricing policies, to the extent that they are intended to shift the choice of transport mode, need to have regard to the limited availability of alternatives in some areas.

Given the above concerns, it is important to recognise the risk of developing a "three speed region", with strong investment in the Cheltenham/Monash/Clayton sub region associated with the National Employment and Innovation Cluster and Suburban rail loop project, a commitment to a high level of service provision, precinct planning and 20 minute

neighbourhoods in the growth areas, but limited attention to outer/interface areas, with an increasing infrastructure/service gap.

Recommendation 14

That DELWP be advised that Council acknowledges the emphasis on implementing the principle of 20-minute neighbourhoods in growth areas, but would argue that there is an equal need to recognise existing communities where there are service and infrastructure gaps and the impact of projected population growth in areas that are not formally designated as growth areas but which still require a proportionate level of funding for community services and facilities, the provision of open space and active transport networks.

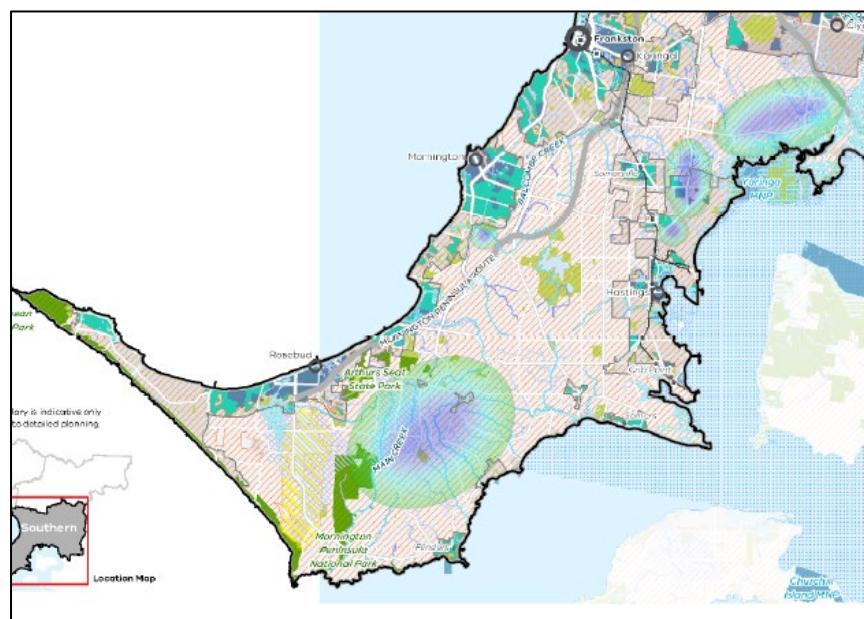
Sustainability and resilience

This section of the LUPP provides a useful overview of some of the current directions and programs being pursued by the State government (and local Councils) in regard to increasing sustainability in resource use and climate change resilience across the region. It highlights policies to mitigate greenhouse gas emissions, reduce exposure to natural hazards (including bushfire), undertake whole of water cycle planning and design, and protect local waterways. It also encourages efficient use of resources and promotes the benefits of urban cooling and greening by increasing tree canopy cover.

The LUPP notes that some areas within the Southern Metro Region are already using recycled water such as the Boneo Recycled Water Irrigation Scheme, while a number of additional opportunities to expand recycled water have been identified, which if realised, could significantly increase agricultural productivity and job creation for the region.

A number of indicative recycled water supply areas on the Peninsula are shown on Map 5 below (shown purple with a blue/green “halo”). These areas include land that is currently within the SUZ1 (Port Related Uses area), again emphasizing the need for a comprehensive review of future land use in this area, and the potential for some parts to be identified as more valuable as strategic agricultural land rather than for any alternative use.

Map 5 Indicative Recycled Water Supply Areas



While there are clearly significant opportunities to increase resilience and sustainability in the southern metro region, the LUFP does not necessarily give clear direction on how certain objectives will be achieved.

For example, in terms of coastal climate change, the strategy included in the LUFP is still primarily limited to mapping areas of vulnerability, without a clear policy direction on the development of land in vulnerable areas, particularly where there may be a conflict with the emphasis on residential consolidation in established areas. In this context, there needs to be a strong commitment and high State and regional priority given to:

- further policy development in regard to development in vulnerable areas, including issues of future legal liability,
- the introduction of consistent State-wide planning controls to manage climate change risks, and
- support for adaptation pilot programs and community engagement programs to assess potential alternative responses to coastal climate change hazards.

Equally, the LUFP highlights the goal of increasing urban tree canopy cover. In the case of the Mornington Peninsula, this involves an increase in canopy cover from approx. 21% (in 2018) to 30 % by 2050, with a total vegetation cover (tree and shrubs) by 2050 of 50 %.

Given the substantial emphasis in the LUFP on increasing housing densities in established areas, it is reasonable to question how likely this goal is to be achieved, particularly given the bushfire protection provisions (Clause 52.12) of the planning scheme. These provisions enable the removal of all trees within 10 metres (and all other vegetation within 30 metres) of any dwelling constructed prior to 2009 that is within a Bushfire Prone Area (designated under the Building Act 1993), without any planning assessment.

It is possible that a “technical” increase can be achieved by revegetation of larger lots – but this is unlikely to provide “cooler spaces” in the town centres and throughout residential areas which is the actual objective of the policy. It appears that a significant focus for increasing canopy cover will need to be on public open space and road reserves, which may result in other conflicts. Accordingly, guidelines and case studies on the practical implementation of greening strategies are necessary support this policy direction.

Finally, it is important to recognise that in addition to policies and programs specifically targeting sustainability and resilience that the whole of the metropolitan strategy is in some sense “about” the future sustainability and resilience of Melbourne, from reducing car dependence and providing a more effective public transport system, to securing Melbourne’s foodbowl and establishing 20 minute neighbourhoods. The connections between land use and transport strategies and climate change mitigation and adaptation are further outlined on pages 6 and 7 of the LUFP.

In this context, the Mornington Peninsula can have an increasingly important role in increasing regional sustainability and resilience through a range of policies, including carbon sequestration in agriculture (carbon farming) and the potential for large scale revegetation and habitat restoration, possibly with a focus in the Western Port coastal area. A Climate Change emergency response plan at the regional level could both address the implementation of sustainability plans and programs across the southern region in more concrete terms and identify areas and locations providing particular opportunities.

Recommendation 15

That DELWP be advised that Council supports the directions and strategies which seek to increase sustainability and resilience across the Southern metro region and would encourage the development of a more detailed Climate Emergency response plan at the regional level.

Recommendation 16

That DELWP be advised that in terms of coastal planning the continuing mapping of climate change vulnerability has value but there needs to be a State and regional commitment and high priority given to:

- Further policy development to address development in vulnerable areas, including the issue of future legal liability.**
- The introduction of consistent State wide controls to manage climate change risks.**
- Clearer guidance and funding for long-term adaptation planning in areas subject to Sea Level Rise (SLR) risks, including pilot projects and community engagement programs to assess potential alternative responses to coastal climate change hazards.**

CONCLUSION

As outlined above the LUFP has value as an update and refresh of Plan Melbourne at the regional level, reinforcing the general regional strategies, and providing some new actions.

However, the LUFP arguably provides limited benefit in terms of addressing some of the key long term land use and transport planning issues that relate to the regional role and function of the Mornington Peninsula – as a location for significant future population growth, a major recreation area contributing to the liveability of the region, an important part of Melbourne’s foodbowl, a key regional habitat area, a port area and designated State significant industrial precinct etc.

In this context, the Council should strongly advocate the need for further work to be undertaken between DELWP, the regional Economy and Planning Working Group and individual Councils in working towards the next five-year Plan Melbourne implementation plan due to be produced in 2023. In this regard, it is particularly important to highlight the need for a comprehensive and strategic review of the State Significant Industrial Precinct/SUZ1 area before any decisions are made on the future of this area.

In addition, given the particular challenges faced by the Mornington Peninsula, Council should further seek to work directly with DELWP and other state agencies on the development, in consultation with the community, of an agreed longer term vision, potentially in the form of a Statement of Planning Policy for the Mornington Peninsula, based on, updating and extending the Mornington Peninsula Localised Planning Statement.

Recommendation 17

That DELWP be advised that, having regard to the previous recommendations, there is a need for further work to be undertaken between DELWP, the regional Economy and Planning Working Group and individual Councils in working towards the next five-year Plan Melbourne implementation plan due to be produced in 2023. In this regard, it is particularly important to highlight the need for a comprehensive and strategic review of the State Significant Industrial Precinct/SUZ1 area before any decisions are made on the future of this area.

Recommendation 18

That DELWP be advised that given the particular challenges faced by the Mornington Peninsula, Council would seek to work directly with DELWP and other state agencies on the development, in consultation with the community, of an agreed longer term vision, potentially in the form of a Statement of Planning Policy for the Mornington Peninsula, based on, updating and extending the Mornington Peninsula Localised Planning Statement.