

Plan for Victoria and draft housing targets

Mornington Peninsula Shire Council submission



Mornington Peninsula Shire Council

Submission to the Department of Transport and Planning

Plan for Victoria

and

Draft housing targets

August 2024

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Abbreviations

Bushfire Management Overlay	BMO
Bushfire Prone Area	BPA
Council Alliance for a Sustainable Built Environment	CASBE
Department of Transport and Planning	DTP
Design and Development Overlay	DDO
Development Contributions Plan Overlay	DCPO
Localised Planning Statement	LPS
Municipal Association of Victoria	MAV
Minister for Planning	the Minister
Mornington Peninsula Green Wedge	the Green Wedge
Mornington Peninsula Green Wedge Management Plan	GWMP
Mornington Peninsula Housing and Settlement Strategy Refresh 2020-36	HSS
Mornington Peninsula Planning Scheme	MPPS
Mornington Peninsula Shire	the Shire
Mornington Peninsula Shire Council	the Council
<i>Planning and Environment Act 1987</i>	the Act
Planning Institute of Australia	PIA
Planning Policy Framework (PPF)	PPF
Port of Hastings	the Port
Special Building Overlay	SBO
Urban Growth Boundary	UGB
Victorian Planning Provisions	VPPs
Victoria in Future 2019 report	VIF 2019
Victoria in Future 2023 report	VIF 2023

1. INTRODUCTION

1.1 PURPOSE OF THIS SUBMISSION

The Mornington Peninsula Shire Council (the Council) welcomes the opportunity to make this submission to the State Government's engagement program for a new Plan for Victoria (the Plan) and to provide a response to the draft housing targets for the Mornington Peninsula Shire (the Shire).

The State Government commenced their community engagement program in February 2024 to seek feedback from all Victorians on the future of Victorian cities, suburbs, towns and regions, including ideas on the best places to locate new homes, green spaces, jobs, education, transport and health services.

The community engagement material sets out four key pillars to guide conversations and responses:

- Pillar 1 - Affordable housing and choice
- Pillar 2 - Equity and jobs
- Pillar 3 - Thriving and liveable suburbs and towns
- Pillar 4 - Sustainable environments and climate action

Council provided initial responses to the Engage Victoria engagement program as follows:

- contact details of community organisations on the Mornington Peninsula to be invited to participate in workshops, meetings and events - sent to the Plan for Victoria team on 16 January 2024,
- a list of Council's adopted strategies, policies and advocacy positions - sent to the Plan for Victoria team on 16 January 2024,
- submission of an online survey of top priorities under each of the four pillars – sent to Engage Victoria and acknowledged on 24 January 2024.

The State Government then released draft state-wide housing targets on 17 June 2024 for each local council. The target identifies the number of homes to be built between now and 2051. This submission will also respond to the draft housing target for the Shire.

On 4 July 2024 the State Government circulated eight 'Big Ideas' that represent the top priorities identified from their initial community engagement and is seeking feedback on the best way to deliver these eight 'Big Ideas':

- *More homes in locations with great public transport access*
- *More housing options for all Victorians, including social and affordable homes*
- *More jobs and opportunities closer to where you live*
- *More options for how we move from place to place*
- *More certainty and guidance on how places will change over time*
- *More trees and urban greening in our parks and community space*

- *More protections from flooding, bushfire and climate hazards*
- *Greater protection of our agricultural land*

1.2 STRUCTURE OF THIS SUBMISSION

It is understood that the State Government will not be releasing a draft of the Plan for Victoria for community comment before it is finalised in late 2024.

This submission builds on the Shire's survey responses and is based on an array of Council's adopted strategies, policies, plans and advocacy initiatives.

This submission provides a response to the draft housing targets and also has a section on each of the eight 'Big Ideas' with commentary as relevant to the Shire.

The eight 'Big Ideas' fall neatly into the four key pillars of the Engage Victoria consultation program as follows:

Big Idea	Pillar
<i>More homes in locations with great public transport access</i>	Pillar 1 - Affordable housing and choice Pillar 3 - Thriving and liveable suburbs and towns
<i>More housing options for all Victorians, including social and affordable homes</i>	Pillar 1 - Affordable housing and choice
<i>More jobs and opportunities closer to where you live</i>	Pillar 2 - Equity and jobs
<i>More options for how we move from place to place</i>	Pillar 2 - Equity and jobs Pillar 3 - Thriving and liveable suburbs and towns
<i>More certainty and guidance on how places will change over time</i>	Pillar 3 - Thriving and liveable suburbs and towns
<i>More trees and urban greening in our parks and community space</i>	Pillar 3 - Thriving and liveable suburbs and towns Pillar 4 - Sustainable environments and climate action.
<i>More protections from flooding, bushfire and climate hazards</i>	Pillar 4 - Sustainable environments and climate action.
<i>Greater protection of our agricultural land</i>	Pillar 4 - Sustainable environments and climate action.

1.3 REQUEST LOCAL GOVERNMENT INPUT INTO A DRAFT PLAN FOR VICTORIA

It is disappointing that the local government sector is not able to provide meaningful feedback on a draft version of the Plan following the closing of the general community engagement program.

Council requests that all local governments, including our Council, can review and respond to a draft version of the Plan for Victoria. This will result in a more effective Plan that better reflects the needs of all Victorians.

2. TOP PRIORITIES FOR THE MORNINGTON PENINSULA SHIRE

As stated in our survey response, the top priorities for the Mornington Peninsula Shire are:

- ***Accommodating population growth in housing that is affordable, diverse and allows people to age in place.***

Housing in the Shire is becoming increasingly unaffordable. It is now significantly more expensive to rent a home on the Mornington Peninsula than in Melbourne. The Shire has a shortage of approximately 4,716 social houses. Low-income local residents are being forced out of the region, away from their families and support networks or are being rendered homeless. The supply of future homes must also provide a diversity of size and housing typology to allow housing choice for each life stage.

- ***Delivering required infrastructure in a timely manner and implementing a mechanism to fund this infrastructure.***

The Shire has an extensive list of important infrastructure projects that are required to meet the needs of its community - from road upgrades to bicycle paths and footpaths, coastal infrastructure, community facilities, leisure and recreation facilities, and other essential infrastructure. The Development Contributions Plan Overlay has been unsatisfactory in delivering funds. In the current rate-capped environment and with several economic headwinds affecting both the Shire's and Victoria's capacity to raise funds for these important projects, new fairer mechanisms of funding such projects are required.

- ***Stronger emphasis on climate change risk mitigation in settlement planning and built form.***

The Shire faces a wide array of increased risks from climate change; including more frequent and higher intensity bushfires, coastal inundation and inland flooding and decreased agricultural output and drought. The Plan for Victoria must set the agenda for ensuring that Victoria's planning system is responsive to the most up to date data on climate change risks, and that these risks are able to be fully accounted for when making planning decisions.

- ***Protection of the Mornington Peninsula Green Wedge***

Council's adopted Mornington Peninsula Green Wedge Management Plan (GWMP, 2019) plans for the ongoing protection of the Mornington Peninsula Green Wedge (the Green Wedge) and the Urban Growth Boundary (UGB) to preserve arable land in the peri-regional area for food production

and to protect the resource base of the Green Wedge for its conservation, landscape and informal recreational values. The key directions of the GWMP are to confirm the UGB, prohibit urban expansion into the Green Wedge, protect the landscape and protect the capacity of agricultural land.

3. RESPONSE TO DRAFT HOUSING TARGETS

3.1 THE DRAFT HOUSING TARGET TIMEFRAME TO 2051

The draft housing target for the Mornington Peninsula Shire is 31,000 new homes by 2051. This equates to an average of 1,148 new homes per year over the next 27 years. This is consistent with what the Shire is already planning for under the *Mornington Peninsula Housing and Settlement Strategy Refresh 2020-36* (HSS) and the current Planning Scheme Amendment C219morn (1,200 new homes per year).

Under existing planning controls (and Amendment C219morn) the Shire has a conservative housing capacity of between 25,400 and 25,200 net additional dwellings respectively. This meets the 15-year housing supply that should be planned by each local government according to Clause 11 of the Planning Policy Framework (PPF). It is noted that *Planning Practice Note 90 (Planning for Housing)* specifically calls for housing capacity to be planned for a 15-year period (at minimum).

The draft housing targets have a timeframe to 2051, i.e., 27 years. Whilst the longer 27-year target is a useful 'aspirational' strategic planning tool, the existing 15-year timeframe in the PPF and Planning Practice Note is considered the appropriate realistic planning timeframe and should be retained in the PPF and Planning Practice Note.

Beyond the 15 years, there is too much uncertainty and potential for change across political, economic, and demographic settings, both locally, nationally, and globally, that can significantly affect the demand and supply of housing. Also, in the later timeframe the following assumptions may also change which would result in a different target:

- population growth
- actual construction rate of dwellings
- average household size (currently 2.3 persons)
- dwelling occupancy rate (currently 77%)

Guidance should also be provided as to how holiday homes should be treated in assessing housing capacity. On the Mornington Peninsula, there is a pool of holiday houses or short-term rentals that may be converted over time to permanent use. It is also important to recognise that the tourism and recreation sectors of the local economy are also dependant on an ongoing supply of short-term rentals.

Two further important factors complicate the sustainable delivery of housing growth in the Shire over the long-term.

Firstly, the Shire has very poor public transport connectivity. Eighty two percent of the Shire is not serviced by adequate public transport. The public transport options are limited to infrequent and often meandering bus routes, and a single-track diesel train service to Stony Point (refer to section 7.1 for further information).

Secondly, the recognised and protected distinctive character and landscape of the Mornington Peninsula. The Shire's special character is recognised through our Localised Planning Statement (LPS) and extensive application of comprehensive and restrictive Design and Development Overlays in residential areas, Significant Landscape Overlays, Environmental Significance Overlays, and over 70% of the Shire is zoned Green Wedge.

It is noted that the modelling for the housing targets did identify constrained land and applied a discount to capacity accordingly, as referenced in the Department of Transport and Planning (DTP) Modelling Webinar on 24 July 2024. It is noted that these discounts apply to some overlays (e.g., Heritage Overlay, Land Subject to Inundation Overlay and Vegetation Protection Overlay). However, it does not apply to other overlays such as the Design and Development Overlay which constrains potential development in many residential areas of the Shire.

Council would like work with the DTP to review the extent and nature of these constrained areas to ensure that relevant factors have been given appropriate weighting in the draft housing target.

Recommendations:

1. The draft housing targets be revised to provide a 15-year horizon (as per the existing PPF), with the 27 year horizon being an aspirational target.
2. That Council work with DTP to confirm that the modelling for the draft housing target has regard to the Shire's special characteristics that constrain sustainable residential development, namely the Urban Growth Boundary, extent of Green Wedge, vulnerable coasts on both Port Phillip Bay and Western Port Bay, extent of bushfire prone land and inadequate public transport.

3.2 BASIS OF TARGET CALCULATION

The Engage Victoria webpage states that each draft housing target was calculated on:

- *An area's proximity to jobs and services*
- *Level of access to existing and planned public transport*
- *Environmental hazards like flood and bushfire risk*
- *Current development trends and places already identified for more homes (like the Suburban Rail Loop Precincts, for example).*

Further to comments in 3.1 above, Council contends that a significantly poor score across any of the single factors identified above may bottleneck housing growth targets from being met in a sustainable manner. A particularly poor score should be weighted proportionally more than an average score across these factors. In the case of the Mornington Peninsula (as a 'Metropolitan' local government area) the public transport connectivity is very poor.

Whilst the DTP modelling purports to consider 'constrained' land, it is unclear how the capacity was calculated specifically for the Shire, as the urban modelling study area map appears to include only the northern townships (possibly Mount Eliza, Mornington and Mount Martha) but excludes all other areas of the Mornington Peninsula.

In addition, the modelling noted discounts to future capacity in areas affected by some overlays but did not include the Design and Development Overlay (DDO) due to its varied local applications. The DTP has acknowledged this as a gap in the modelling. There are many DDOs across large areas of the Shire that restrict potential development through height controls (two storeys) and minimum subdivision sizes.

The DTP Modelling Webinar on 24 July 2024 explained that the housing targets will differ from the *Victoria in Future 2023 Report* (VIF 2023). The VIF 2023 predicts 736 dwellings per year (until 2036) whereas the draft housing target requires 1,148 new homes per year over the next 27 years.

VIF 2023 specifically considers the predicted dwelling and population growth at the LGA level up to 2036:

- Mornington Peninsula's population will grow to 187,540 (from 168,948 at the 2021 Census, or 1240 persons/year)
- Mornington Peninsula's dwelling stock will grow to 104,543 (from 93,502 at the 2021 Census, or 736 dwellings/year)

(The VIF 2023 report revises the previous *Victoria in Future 2019 Report* (VIF 2019). In the VIF 2019 report, the Shire's population in 2036 was predicted to be 200,360 by 2036. The projected population has reduced by 12,820 people in VIF 2023.)

DTP states that the VIF 2023 data uses a demographic baseline and therefore gives a minimum number of dwellings required whereas the housing targets aim to direct an increased supply to suitable locations.

The actual delivery of 1,148 new homes projected out for 27 years may be too optimistic for that total timeframe, considering the recent delivery rate of 1000 homes per year (ABS data). In fact, the rate between 2016 and 2021 was slightly lower at 897 per year.

Whilst it is acknowledged that the housing targets will be more than the VIF 2023 predictions, Council requests a review of the draft housing target to account for the DDO limitations to development.

The DTP modelling also assessed the feasibility of delivery (development costs and profitability). The Engage Victoria webpage states that targets were calculated according to 'current development trends.' If that is taken to be higher value land (to ensure an increase in return), then future targets will just replicate the same development trends. The cities and regions will not be 'shaped' in a meaningful way to direct housing supply, growth and diversity to truly create 'liveable suburbs and towns.'

The Engage Victoria webpage also does not clarify whether the targets account for approved permits (not yet constructed) and the number of potential lots in current rezonings awaiting Ministerial approval.

The DTP modelling package specific to the Shire should be made available for assistance with long term strategic planning, the periodic review of housing capacity and the provision of supporting infrastructure to

support liveable townships. This information should be circulated to each municipality in Victoria for proper settlement planning as required in the PPF.

Recommendations:

3. That Council work with DTP to revise the modelling for the draft housing target to reflect potential limitations of areas affected by Design and Development Overlays.
4. That Council requests DTP to confirm if the urban modelling study area excludes the Mornington Peninsula.
5. Council request that DTP should circulate the modelling assumptions and applications to each Victorian municipality.
6. DTP should publicly release modelling maps of housing targets to show how the targets 'shape' the Plan for Victoria.

3.3 THE TARGETS SHOULD BE CONFIRMED FOR HOUSING CAPACITY NOT HOUSING DELIVERY

The Engage Victoria webpage defines the draft housing targets as “*an initial distribution of new homes across each local government area.*”

The DTP modelling indicates that the draft housing targets are for ‘feasible capacity’, i.e., enough appropriately zoned land for the market to act and supply houses. This definition should be made explicit in all communications materials for the Plan for Victoria.

It is also an opportune time to include housing diversity into the housing targets. Local government can influence the amount of land zoned for residential purposes, however, the private property market largely determines housing types, diversity of stock, and timing of release of houses. For this reason, the housing targets should include diversity targets – housing typology, house size, and affordability, with a subsequent change to the Victorian Planning Provisions (VPPs) to require this diversity – also refer to section 5.1 below.

The Plan should also refer to influences on housing delivery outside of planning policy. The PIA (Victoria) submission *Policy Position Paper Housing Targets 2024* notes that delivery rates are influenced by many other factors beyond zoning capacity, and may include:

the interplay of taxation settings, interest rates and relative access to finance, the cost of labour and construction materials, and the relative ‘scarcity’ of land with convenient access to city labour markets and economic opportunities. (Page 5)

PIA (Victoria) also refers to the ‘carrying capacity’ of each municipality based on constraints and opportunities. As the Shire does not have large scale development opportunities (as opposed to growth areas) most of the residential zoned land may take decades for incremental growth to occur, such as one dwelling being replaced with three.

The Shire also has serious development constraints in the form of environmental values, land subject to climate change hazards, lack of public transport, absence of major employment precincts and aging community infrastructure.

Recommendations:

7. DTP should define housing targets as housing capacity targets.
8. The draft housing targets should include 'Diversity' targets for housing size, typology, and affordability index.

3.4 HOW WILL THE DRAFT HOUSING TARGETS SHAPE THE PLAN FOR VICTORIA?

The Engage Victoria webpage refers to 'shaping' the future of Victoria by "reimagining the future of our cities, suburbs, towns and regions".

To 'shape' Victoria, new housing must be directed to the most appropriate locations with good access to public transport and services or where State Government investment is already occurring rather than just intensifying existing settlement patterns.

Recommendation:

9. The draft housing targets should seek to 'shape' future housing distribution and direct it to areas with existing access to frequent public transport and community infrastructure or where State Government investment is already occurring rather than just intensifying existing settlement patterns.

3.5 FUTURE HOUSING REQUIRES ASSOCIATED INFRASTRUCTURE

Providing available land for housing is just one piece of the housing puzzle. Available land does not necessarily translate to houses being built, this is dependent on market forces, well outside planning.

For these housing targets to translate into successful communities, local councils' need funding to deliver the essential local infrastructure to support these new residents. Simple things like money to deliver footpaths to allow people to walk from their homes to shops and services in their local activity centre, money to upgrade and renew old sporting facilities, community halls, libraries, etc, to cater for the increased population.

The current mechanism for collecting development contributions is the Development Contributions Plan Overlay (DCPO). For infill areas like the Mornington Peninsula, this mechanism is not fit for purpose.

Along with funding for essential local infrastructure, significant upgrades to public transport are required. Whilst the Shire is being expected to cater for an addition 31,000 new homes, the nearest electrified train station is in Frankston (40km from the Rosebud Major Activity Centre) and 82% of the Shire is not serviced

by public transport. Without significant upgrades to public transport, these housing targets will only entrench the reliance on the private car.

Additionally, existing roads are reaching capacity. For example, Mornington-Tyabb Road (a state arterial road) will soon be reaching capacity and require duplication and yet there is no State funding to deliver this much needed upgrade.

Although the DTP modelling did allocate housing based on access to public transport, the DTP has acknowledged the gap of 'infrastructure capacity' and seeks feedback on this issue. This is considered to be a critical gap – also refer to sections 7.1 and 7.2 below.

Recommendations:

10. That Council work with DTP to revise the modelling for the draft housing target to address areas of inadequate infrastructure capacity.
11. The Plan for Victoria should include an action to review the Development Contributions Plan Overlay for the provision of development and community infrastructure or propose another mechanism to collect contributions from infill development.
12. The DTP to integrate plans for significant upgrades to public infrastructure and plans to upgrade major roads nearing capacity in areas identified for future housing growth.

3.6 TARGETS DO NOT SPECIFY SOCIAL HOUSING

Council also calls on the State Government to ensure that a percentage of the additional homes (of the total in the housing target) are social housing, to cater for the Shire's most vulnerable residents.

The current voluntary approach is not working. Section 5.2 provides further details on this matter.

Recommendation:

13. The Plan for Victoria should include a state-wide mechanism in the Victorian Planning Provision (VPPs) to require mandatory developer contributions to deliver social housing.

3.7 ENVIRONMENTAL HAZARDS TO BE CONSIDERED IN NEW HOUSING AREAS

Council is pleased to see that the housing targets consider environmental hazards such as bushfire risk and flood. However, it is not clear whether they also consider sea-level rise or coastal erosion.

It is essential that the housing targets take sea-level rise and coastal erosion into account and that the State Government puts in place state-wide planning controls that reflect this risk to ensure that timely and consistent planning can take place. It is noted that Action 3.9 of the State Government's *Marine and Coastal Strategy* (2022) outlines this task, and places emphasis on using the latest and best available science.

The areas vulnerable to sea level rise and coastal erosion have been identified in the Western Port Local Coastal Hazard Assessment (WPLCHA) and the Phillip Bay Coastal Hazard Assessment (PPBCHA) – also refer to section 10.2 below.

Council is advocating for sea level rise hazards to be addressed in planning schemes by the State Government in much the same way as other key environmental hazards - namely bushfire - are addressed. The State Government should produce the scientific data, fast-track implementation of appropriately tailored planning controls and continue to update the application of controls as hazards change, based on the best available scientific data.

Recommendations:

14. The Plan for Victoria should include an action to undertake state-wide sea level rise mapping and a state-wide mechanism in the VPPs to address future development in identified areas vulnerable to sea level rise.
15. The application of the final housing targets must specifically consider the impacts of sea level rise and coastal erosion on housing capacity.

3.8 FUTURE USE OF SURPLUS LAND FOR THE PORT OF HASTINGS

Whilst Council's current planning for housing is consistent with the State Government's draft housing targets over the next 15 years, in the longer term, additional land will be required. With around 70% of the Shire being zoned green wedge (providing significant agricultural, environmental, landscape, recreational and tourism benefits), there is a limited supply of residential land.

There is a significant opportunity on the Western Port Bay side of the Shire for land that is currently locked up for industrial uses associated with the Port of Hastings (the Port) to be released for other uses, including housing, industry, farming and conservation.

Council has been calling on the State Government to identify what land is surplus to the Port's needs and to comprehensively plan for this area with Council and the community. It is a significant area that covers approximately 3,500 ha, spanning from Somerville to Crib Point, all within the Urban Grown Boundary.

Recommendation:

16. In conjunction with the Council, the State Government should facilitate a precinct plan for land identified as surplus in the Port of Hastings strategic development plan, to provide the southern metropolitan region a large area of land for housing, industry, farming and conservation.

3.9 PROTECTION OF SIGNIFICANT VALUES OF THE MORNINGTON PENINSULA

As set out in the Localised Planning Statement, “The Mornington Peninsula will be planned as an area of special character and importance with a role clearly distinct from and complementary to metropolitan Melbourne and designated growth areas. The Mornington Peninsula is one of Melbourne’s greatest assets, characterised by contained townships, a substantial and diverse local economy, and areas of national and international conservation significance”.

The Mornington Peninsula is critical to the future liveability, sustainability and prosperity of the wider metropolitan region. As an area near to, but with a role distinct from, the growing metropolitan area there are ever increasing pressures and demands placed on the Mornington Peninsula’

Recommendation:

17. The State Government collaborate with Council to ensure the final housing targets reflect the important and distinct role the Mornington Peninsula plays in the context of the wider metropolitan region and ensure that the special values of the Shire are maintained and enhanced for all Victorians.

3.10 HOUSING TARGETS AND SHORT-TERM RENTAL ACCOMMODATION

It is unclear if the calculation of the draft housing targets has factored in the proportion of short-term rental accommodation in each local government area. The Shire has over 1.6 million people stay overnight when visiting the Shire each year, making it the third largest short-stay rental accommodation destination in Australia.

This tourism is a key economic contributor, however the large number of holiday homes and short-term rental properties effectively reduces available housing supply.

As background information, Council adopted the *Short Stay Rental Accommodation (Amendment) Local Law* in 2022. It was introduced to manage an increase in noise, poor behaviour and rubbish complaints. The \$335 registration fee was set to cover the costs of managing this additional compliance. Total registrations amount to approximately \$870,000 a year.

Last year the State Government announced a 7.5% short stay accommodation levy to be introduced in 2025. Council has responded that this levy will severely impact the Shire’s struggling tourism and hospitality

sectors, override the adopted current short stay rental local law and do nothing to solve the housing and rental affordability problem.

It is estimated that the new levy may raise more than \$10 million from the Mornington Peninsula alone and Council is concerned this money will not be reinvested in the Shire. Council has advocated that as a major contributor the Shire should receive significant investment in social, crisis and affordable housing.

Recommendation:

18. The draft housing targets should factor in the proportion of short-term rental accommodation in each local government area.

4. BIG IDEA ONE: MORE HOMES IN LOCATIONS WITH GREAT PUBLIC TRANSPORT ACCESS

4.1 APPROPRIATE LOCATION OF HOUSING

The adopted HSS addresses the housing needs, capacity, and the preferred locations for housing growth across the Shire. The current Planning Scheme Amendment C219morn (currently at post-panel stage) seeks to implement the HSS strategy.

The HSS has found that the Shire is forecasted to require 1,200 new homes to be constructed each year over this period to meet forecasted housing demand. In planning for where this growth is to be accommodated, the plan considers environmental values and risks, neighbourhood and landscape character, and strategic characteristics such as proximity to transport, jobs, and services. In summary, the preferred locations for accommodating housing growth are in established townships and major activity centres. Indeed, the Shire's many adopted township and activity centre structure plans provide support for increased housing density within the core of these areas.

Many residential areas on the Mornington Peninsula have limitations in terms of convenient access to public transport, compared with metropolitan municipalities serviced by the Principal Public Transport Network (PPTN) where land is within 400m of public transport.

Locating areas of more substantial housing growth within large townships and major activity centres also works to preserve the important, recognised special characteristics of the remainder of the Mornington Peninsula. The LPS confirms the importance of smaller towns, villages, coastal and rural areas as having a special distinctive character that separates it from metropolitan Melbourne.

Recommendation:

19. The new Plan for Victoria must highlight the Mornington Peninsula Localised Planning Statement and have regard for the Mornington Peninsula's special characteristics that limit its ability to absorb significant population growth.

5. BIG IDEA TWO: MORE HOUSING OPTIONS FOR ALL VICTORIANS, INCLUDING SOCIAL AND AFFORDABLE HOMES

5.1 WHOLE OF LIFE HOUSING CHOICE

As recognised within the HSS and Councils adopted *Triple A Housing Plan 2020-2030*, the provision of a diversity of housing stock is an important planning objective. When met, this allows for more efficient housing outcomes and ageing-in-place.

Housing stock across the Shire is dominated by detached single dwellings (over 85%). This is despite the Shire's varied family composition structure, which is expected to continue to evolve over time. State-wide, this pattern of housing stock does not reflect common household structures.

The VPPs have proven to be weak in driving housing diversity in residential developments. Clause 16 (Housing) only briefly considers diversity of housing types, and Clause 55.02-3 (Dwelling diversity objective) is only applicable to developments of 10 or more dwellings. The Shire's statutory planners seek greater diversity (one- and two-bedroom houses) but are met with developer resistance due to commercial loss on smaller units.

Without stronger application of policy, the development industry will continue to primarily deliver housing types that have the highest commercial value (in the Shire's context, three- and four-bedroom dwellings), rather than a more diverse array of dwelling types that bring greater social benefit. As the market has failed to deliver adequately diverse housing stock that more accurately reflects housing's role as an essential service (rather than an investment vehicle), there is a clear, legitimate role for town planning to correct this failure.

A potential mechanism to correct the lack of housing diversity is to reduce the threshold at which Standard B3 of Clause 55 applies and codify the development outcomes that are deemed to satisfy the standard. As noted in section 3.3 above, housing diversity targets could be introduced for housing type, size and 'affordability' index.

The new Plan must emphasise the importance of providing a diverse range of housing stock to meet the varied housing needs of the Victorian community.

Also refer Recommendation 8 above.

Recommendation:

20. The VPPs be amended to introduce a codified Rescode benchmark that any multi dwelling development of three or more dwellings must provide at least one dwelling with no more than two bedrooms.

5.2 INCLUSIONARY ZONING

It is an unambiguous objective of the *Planning and Environment Act 1987* (the Act) to facilitate the provision of affordable housing in Victoria. While there are many factors beyond the influence of planning regulation that affect housing affordability, the Victorian planning system has so far failed to play its part and properly deliver on this objective. By many measures, housing affordability in Victoria is at its lowest level in decades, with a particularly steep decline since 2020.

Indeed, the current metropolitan planning strategy *Plan Melbourne* (2017) specifically calls for the consideration of introducing inclusionary zoning into the Victorian planning system, possibly by the introduction of new planning provisions or other mechanisms. So far, progress on this implementation action has been limited to a handful of surplus government land sites, with no minimum requirements for the provisions of affordable housing.

The Shire's *Social and Affordable Housing Policy* (2023) outlines our intent to advocate for changes to Victoria's planning system to ensure that equitable contributions from major developments are made towards addressing the dire lack of both social and affordable housing across the Peninsula.

Council has recently consulted with the community about the *Draft Affordable Housing Development Contributions Strategy* (SGS Economics and Planning, 2024). This draft strategy recommends that the implementation of inclusionary zoning across the Mornington Peninsula is pursued to specifically provide for social housing. Development contributions towards social housing currently operate on a voluntary basis, with the amount negotiated on a site-by-site basis.

Inclusionary zoning recognises social housing as essential infrastructure which new development should contribute towards. A similar approach is already applied across Victoria for other infrastructure, like public open space, with developers having to either provide public open space as part of their development or pay money to Council to provide it.

Other local councils are investigating a similar approach to deliver funding for social housing. Requiring each Council to introduce inclusionary zoning provisions is an ad hoc approach that wastes time and resources and does not give certainty to developers. The issue of social housing supply is not limited to a few councils and should be implemented through a State wide scheme.

The new Plan for Victoria should include a state-wide mechanism in the Victorian Planning Provision (VPPs) to require mandatory developer contributions to deliver social housing.

Refer Recommendation 13 above.

6 BIG IDEA THREE: MORE JOBS AND OPPORTUNITIES CLOSER TO WHERE YOU LIVE

6.1 SURPLUS PORT RELATED LAND

Over 3500 hectares of land surrounding the Port have been held in reserve for 'port related' uses since the 1970s. While clarity on the future role of the Port may be provided with the next iteration of the *Port Development Strategy* (due late in 2024), it has become increasingly clear already that significant portions of

land currently zoned Special Use Zone 1 (Port related uses) will be surplus to the future needs of the Port, regardless of the specified future role of the Port.

Council has continually advocated for the release of surplus port land so that it can be put to more productive uses, potentially including a mix of housing, light industry, conservation and agriculture. Due to the scale of strategic planning involved, the State Government must work in partnership with Council to achieve these outcomes.

The new Plan must provide strategic directions to unlock the potential of this surplus Port land and acknowledge the comprehensive community engagement of strategic planning work that must be carried out to guarantee planning outcomes that benefit the community and have minimal detriment effects on the existing communities of Crib Point, Hastings, and Somerville.

Refer Recommendation 16 above.

6.2 HIGH VALUE EMPLOYMENT

The Mornington Peninsula's economy is currently underpinned by employment in the services sector, particularly in health, retail, education, hospitality, and construction. However, Council's adopted economic and tourism strategy *A Thriving Peninsula 2033* highlights the opportunity and potential for the Shire's to develop new and emerging industries. These include advanced manufacturing, renewables, innovative agricultural-technology, and the circular economy.

The economic and tourism strategy also calls for the development of educational and career pathways for school leavers to work in strategic local industry. The Commonwealth Government's investment in new, high-value industries, known as '*Future Made in Australia*', complements our economic development strategy and sets the national policy agenda upon a path of nurturing the development of high-tech industry. New high-tech employment precincts should also be supported by strong linkages to educational institutions.

Recommendation:

21. The new Plan for Victoria should identify strategic locations for high-value employment precincts.

7 BIG IDEA FOUR: MORE OPTIONS FOR HOW WE MOVE FROM PLACE TO PLACE

7.1 MORE FREQUENT PUBLIC AND ACTIVE TRANSPORT

The Mornington Peninsula's status as a municipality on the urban fringe brings many benefits to its residents. Unfortunately, the distance from metropolitan Melbourne's Principle Public Transport Network and the vast geographic spread of the municipality has also contributed to an overreliance on the private car for mobility.

Public transport options across the Shire are very poor. Most areas do not receive any public transport service at all, and areas that do are mostly restricted to infrequent bus services. Only 3% of the Shire's

residents use public transport at all, compared to 15% of Greater Melbourne. The 2021 census showed that only 0.9% of trips to work on the Mornington Peninsula involved any type of public transport.

The Shire has actively campaigned for significant improvements to public transport servicing our community. This includes:

- *Our Better Buses* campaign for a more reliable, faster and more frequent express bus route to connect our major townships with Frankston train station, with peak period frequencies of 15 minutes and a transition to zero emission buses within the next five years.
- A pivotal east-west bus link between Hastings and Mornington.
- Extended operating hours for the Rosebud Flexi Ride service.
- Extension of the Flexi Ride service to include Mornington / Mt Martha, for connection to the proposed Mornington to Docklands ferry service.
- A review of timetables and coordination between connecting bus and train services.
- Bicycle carrying equipment for buses on the Peninsula.
- An upgrade of train stations to improve safety, amenity, accessibility, and active transport connections.
- Funding for rail electrification from Frankston to Langwarrin and Hastings, and integration of a bus transport hub to support this.
- Interim improvements in the service frequency on the Stony Point line, to at least 20 minutes during peak periods and 40 minutes off-peak.

Further entrenching our community's reliance on the private car is the undersupply of pedestrian and bicycle infrastructure across our townships. Council is highly cognisant of the wide variety of benefits derived from increased uptake on walking and cycling, as detailed in our *Sustainable Transport Strategy 2015-2020* and our *Pedestrian Access Strategy 2024-2034*. However, the development of active transport infrastructure is expensive, and raising the required funding to develop extensive trails and paths is very challenging in a rate cap constrained budget and with the existing tools available to capture development contributions.

Recommendation:

22. The Plan for Victoria must include actions for the development of public transport infrastructure for urban-fringe councils and propose mechanisms to fund the improvement and development of active transport infrastructure.

7.2 FUNDING URBAN INFRASTRUCTURE

As above, but more broadly, it is a significant challenge for councils to raise funds for critical infrastructure to support a growing population, particularly for infill development. The Shire's experience with the Development Contributions Plan Overlay has been unsatisfactory. It has proven itself to be slow, unpopular, and avoidable. Similarly, the requirements of Clause 53.01 (Public open space contribution and subdivision) are not sufficient to ensure the adequate provision of quality public open space and associated infrastructure.

With a draft housing target for 2051 of 31,000 new homes, significant investment in infrastructure to support this population growth is required. There is no clear corresponding plan to fund the development of such infrastructure.

The new Plan must outline potential mechanisms to fund critical infrastructure and upgrades that are equitable and reliable.

Refer Recommendations 11 and 12 above.

8 BIG IDEA FIVE: MORE CERTAINTY AND GUIDANCE ON HOW PLACES WILL CHANGE OVER TIME

8.1 STATE GOVERNMENT ASSISTANCE FOR STRATEGIC PLANNING AND CAPACITY MODELLING

It is assumed that the Plan for Victoria will be a policy document in the PPF, and that each council must consider the document each time their Municipal Planning Strategy is reviewed.

It is unclear whether the final Plan will be a static document like Plan Melbourne, or will be a 'living' document capable of change and in response to unpredicted influences.

Council adopted the HSS in 2020. It outlines how future housing and population growth will be accommodated in the Shire while ensuring the special values and character of the Peninsula are protected for current and future Victorians. The key directions of the HSS are to:

- recognise the limits to the capacity of the Peninsula and of the individual towns and villages to accommodate further growth.
- give priority to the protection of residential character and amenity.
- identify and make provision for changing housing needs to the extent that is consistent with the role, character and function of each township and settlement.
- determine appropriate change through a consultative process.
- ensure that future development is properly supported with infrastructure and services

To provide more certainty and guidance about how areas will be developed, councils are obliged to review their planning schemes every four years. Council adopted its Planning Scheme Review in 2023. It identifies issues and emerging trends at both State and local levels and has a program of planning scheme amendments and strategic projects that are required to ensure the planning scheme is efficient and effective in achieving State and local planning objectives.

As noted in section 3.2 above, the DTP can assist with long term strategic planning by providing consistent and tested capacity modelling for future growth of all land uses.

Refer Recommendation 5 above.

9 BIG IDEA SIX: MORE TREES AND URBAN GREENING IN OUR PARKS AND COMMUNITY SPACE

9.1 URBAN GREENING

All councils in the peri-regional area must balance bushfire risk and urban greening. These are competing land development and protection objectives to provide defensible space, protect established vegetation, combat the heat island effect, and improve biodiversity and amenity. Protection and enhancement of native vegetation is critical for protection of native wildlife.

Council is currently undertaking community engagement with a draft urban forest strategy *Our Urban Forest 2024-2034*. The existing tree canopy is not evenly spread across the Peninsula, with significant variations between different townships. This leads to the impacts of climate change and urban heating being disproportionately being felt by vulnerable communities, residents and ecosystems.

The draft strategy aims to guide and coordinate investment and action to protect, enhance, and expand vegetation and tree canopy in urban areas, with this ambitious and evidence-based target:

By 2034, vegetation is in place to achieve an average of 45% canopy cover in urban public spaces (road reserves and open spaces).

Tree canopy targets will only be successful in the Shire if the bushfire exemptions are revised to prevent the current rate of tree removal – also refer section 10.1 below about bushfire risk.

Similar urban forest strategies are being developed and implemented by many other local governments. Council calls on the State Government to set specific targets to increase canopy cover and to deliver planting projects on land they own or manage.

Recommendations:

23. The Plan for Victoria must provide support at the strategic level for the implementation of urban forest strategies, including the consideration of specific mechanisms to improve canopy cover on privately owned urban land.
24. The Plan for Victoria should include an action to set specific targets to increase canopy cover and deliver planting projects for State owned or managed land.

9.2 OPEN SPACE AND RECREATION FACILITIES

Public open spaces and reserves provide valued green spaces for urban greening and recreational activities. These spaces become more important with increased housing densities.

Council is currently preparing a new Open Space Strategy, replacing the previous version dating from the early 2000s. The objective is for an integrated, accessible, and equitable open space network that meets the wide-ranging needs of a growing and diverse community. It is likely that the strategy will also recommend revised rates for Clause 53.01 (Public open space contribution and subdivision), to ensure that adequate funds are raised to develop high quality open-space and recreation infrastructure.

Many of the detailed plans for activity centres and major townships throughout the Shire involve improvements to the network of open spaces and other recreation facilities. It is essential that councils have the tools available to them to raise funds to properly deliver on these endorsed strategies and plans.

Recommendation:

25. The new Plan for Victoria must provide support at the strategic level for the development and funding of high-quality open space infrastructure, including maintenance, upgrading and replacement over the life of the assets.

10 BIG IDEA SEVEN: MORE PROTECTIONS FROM FLOODING, BUSHFIRE AND CLIMATE HAZARDS

10.1 BUSHFIRE RISK AND URBAN GREENING

Council is continuing to build on its advocacy position for the review of bushfire planning exemptions and mapping. Bushfire planning provisions allow vegetation removal from land covered by the Bushfire Prone Area (BPA) and the Bushfire Management Overlay (BMO) without the need for permit. In particular, the BPA covers large areas of the Shire.

The removal of vegetation under these rules has adverse impacts on biodiversity, natural systems, wildlife habitat, neighbourhood character and heritage. Vegetation retention protects against the 'urban heat island effect'.

Council's recent advocacy efforts are centred on the following initiatives:

- requesting DTP to review of BPA and BMO mapping in specific areas of Sorrento and Portsea
- using the Shire as a pilot test case by experts to analyse the impact of other planning provisions (vegetation loss) and suggest changes to the VPPs
- reviewing bushfire behaviour on the Mornington Peninsula to identify areas of lower risk where the mapping of bushfire controls could be reduced

Recommendation:

26. The Plan for Victoria must provide support at the strategic level for the revision of bushfire planning controls and associated mapping based on the latest and best science.

10.2 ADAPTATION TO SEA LEVEL RISE (COASTAL INUNDATION AND EROSION)

Council has advocated that the State Government should use best available data for urgent adaptation planning in areas at high risk of sea level rise (the Intergovernmental Panel on Climate Change has increased the predicted rise to 1.1m by 2100 under a high-emissions scenario).

In 2023 Council adopted Planning Scheme Amendment C271 to strengthen planning controls in coastal and inland areas around Western Port Bay, to mitigate the previously predicted sea level rise of 0.8 metres up to the year 2100. The planning controls are the Land Subject to Inundation Overlay (LSIO) and Erosion Management Overlay (EMO). Statutory planners can request a Coastal Hazard Vulnerability Assessment which may require conditions for building or conclude whether a site is satisfactory for development.

In December 2024, the State Government released the long-awaited Port Phillip Bay Coastal Hazard Assessment. Council had previously written to the Minister urging the State Government to develop and apply a coastal hazard planning zone and/or overlay that is specifically designed to address risks to land use and development around Port Phillip Bay and Western Port Bay from predicted sea level rise.

Individual councils cannot bear the cost and risk burdens associated with scientific data collection and implementing their own planning scheme amendments to address sea level rise hazards. Without State intervention there is a lack of certainty for future land use and development.

The Commonwealth government may have a role to play in this area. The Commonwealth's *Draft National Urban Policy* specifically lists investing in measures to identify and mitigate the impacts of sea level rise, coastal erosion, and other climate-related risks on our planning, building, and infrastructure frameworks as a possible action of the final National Urban Policy. The State Government should advocate for co-operation amongst all states and the federal government on this issue to avoid duplication of workloads across Australian jurisdictions, where the underlying scientific principles are identical.

Refer recommendations 14 and 15 above.

10.3 FLOODING IN URBAN AREAS

Council is working with Melbourne Water to revise flood modelling and mapping for catchments across the Shire to identify and confirm areas that are prone to flooding. This data will be used as the basis for a planning scheme amendment to introduce the Special Building Overlay (SBO) to urban areas that are liable to inundation by overland flows from the urban drainage system. Currently, the SBO is not applied to any land in the Shire.

The SBO requires a planning permit for buildings and works. Melbourne Water is the referral authority in the SBO and will set appropriate conditions and floor levels to address any flood risk to development.

It would be more efficient if the Melbourne Water flood modelling and mapping were regularly updated and that the State Government amended the planning scheme controls on a periodic basis to reflect the modelling.

Recommendation:

27. The Plan for Victoria must provide support at the strategic level for the review of urban inundation modelling and mapping and implement the associated planning scheme amendments.

10.4 ENVIRONMENTALLY SUSTAINABLE DESIGN

Council has supported Environmentally Sustainable Design (ESD) measures in planning and building controls to help reduce cost of living, better adapt to climate impacts and reduce reliance on fossil fuels.

To this end, Council adopted Planning Scheme Amendment C232morn to introduce a local policy into the MPPS (approved in August 2023). The policy requires applicants to provide ESD assessment reports to show how they will address ESD standards in their applications. The standards include energy performance, integrated water management, indoor environment quality, planning for active transport, waste management and urban ecology.

However, this local policy has its limitations – it does not contain mandatory requirements and does not apply to a large category of development in the Shire, namely single dwellings.

Due to the limitations of the local policy above, Council joined with 24 other local councils under the Council Alliance for a Sustainable Built Environment (CASBE) to request a Planning Scheme Amendment C246morn to introduce a planning provision to achieve ‘zero carbon’ development. This proposed ‘elevated ESD targets’ provision is a stronger approach as it sets objectives and standards that must be achieved.

Council will continue to advocate that the Minister authorise Amendment C246morn with the preferred higher ESD standards.

Recommendation:

28. The new Plan for Victoria should include an action to introduce ESD standards in the VPPs for ‘zero carbon’ development.

11 BIG IDEA EIGHT: GREATER PROTECTION OF OUR AGRICULTURAL LAND

11.1 PROTECTION OF THE GREEN WEDGE

Appropriate protection of the Shire's extensive Green Wedge land continues to be an ongoing planning issue faced by the Shire, and indeed, many other fringe municipalities. Council continues to advocate strongly for more protections and tighter controls over non-agricultural uses.

The Green Wedge is a world-class agricultural region and an integral part of Melbourne's food bowl, producing large volumes of high-quality fruit and vegetables year-round. This region is critical to Victoria's food economy and security, yielding the second highest value food production region per hectare in Victoria. Clearer guidelines and stronger planning controls will help Council's efforts to support our \$1.3 billion agriculture, food and beverage sector and protect the non-urban character of the Mornington Peninsula.

The State Government has reviewed the protection of Green Wedges over recent years (*Planning for Melbourne's Green Wedges and Agricultural Land*), and Council has provided a detailed submission to the State Government as part of the consultation phase of that project.

In 2024, the State Government released its *Planning for Melbourne's Green Wedges and Agricultural Land Action Plan* in which it committed to carrying out many of the proposed reforms as identified in the 2020 consultation paper. Importantly, this includes making Green Wedge Management Plans (GWMPs) a statutory requirement for relevant councils and making other legislative changes to strengthen the protection of Melbourne's Green Wedges. In turn, this will elevate the statutory force of GWMPs.

Council supports actions that reinforce the non-urban purpose and character of the Green Wedge. Metropolitan planning policy has consistently referenced the protection of Melbourne's Green Wedges, and one of the 'Big Ideas' is "greater protection of our agricultural land". However, the Plan needs to emphasise the equally important conservation, landscape and informal recreational values of the Green Wedge that need ongoing protection.

Given the Shire's critical role in Victoria's food economy, Council is also calling on the State Government to invest in infrastructure to give our primary producers access to the millions of litres of Class A recycled water currently being pumped out to sea off the Peninsula's southern coastline each day. Accessing this water is an ideal way to secure climate resilient food production for Melbourne's growing population.

Recommendations:

29. The new Plan for Victoria should incorporate actions to protect the distinctive role and function of the Mornington Peninsula Green Wedge.
30. The new Plan for Victoria should identify a scheme for recycled water infrastructure on the Peninsula to increase resilience to climate change by accessing a high-quality alternative water supply for agricultural industries.

12 MUNICIPAL ASSOCIATION OF VICTORIA / PLANNING INSTITUTE OF AUSTRALIA SUBMISSION

The Municipal Association of Victoria (MAV) and the Planning Institute of Australia (PIA) have released a joint statement on the proposed Plan for Victoria – see attached.

Council supports the following suggestions in that joint statement:

- The Plan should be supported by regional plans to guide implementation.
- The State Government should establish a Professional Reference Group of local government representatives, PIA, MAV, development industry representatives, relevant peak bodies and planning experts to provide technical advice on implementation actions to ensure it is both ambitious and achievable.
- The Plan should commit to a net-zero built environment and meaningful integration of climate change into the planning system.
- The Plan should list measurable outcomes – these may include housing capacity targets (including social and affordable housing), increased public transport usage, open space and tree canopy (green infrastructure) and overall sustainability.
- Implementation actions should clearly articulate responsibilities of state and local governments.
- The Plan must integrate land use and transport planning.

MAV also released a statement about the housing target announcement on 17 June 2024. Council supports the comments on that statement that reinforces comments in this submission about the critical need for community infrastructure and an emphasis on housing diversity:

Sustainable growth requires the associated community infrastructure to make areas liveable, and to have employment and services close by ...

Across Victoria's cities, suburbs, and regional towns a key focus must be on the quality and diversity of housing type.

The MAV statement refers to current and proposed land use rezonings and approved planning permits which represent significant numbers of additional housing stock. Council strongly supports this MAV request:

Many councils are continuing to re-zone land and lodge planning scheme amendments to allow the possibility of additional housing stock to be built. We seek to work with the Planning Minister to open up these pathways to providing new housing development opportunities.

We will also seek to work with the development industry and the State Government to get the more than 100,000 dwellings that have already been approved by councils – but not yet begun construction – built.

The MAV statement also flags developer contributions which has been raised by Council in this submission.

13 CONCLUSION

Council is keen to work with the State Government to ensure that the final housing targets reflect the important and distinct role the Mornington Peninsula plays in the context of the wider metropolitan region and to ensure that the special values of the Mornington Peninsula are maintained and enhanced for all Victorians.

Council is pleased to present this submission to the Victorian Government's engagement program for a new Plan for Victoria. Council requests that a draft Plan be circulated to all local governments for more meaningful assessment and review prior to release of a final version.

END OF DOCUMENT