

DRAFT Housing Strategy

Feedback Report for the Community Review of the Draft Housing Strategy April 2024

Acknowledgement of Traditional Owners

Yarra Ranges Council acknowledges the Wurundjeri and other Kulin Nations as the Traditional Owners and Custodians of these lands and waterways.

We pay our respects to all Elders, past, present, and emerging, who have been, and always will be, integral to the story of our region.

We proudly share custodianship to care for Country together

This report has been prepared by Yarra Ranges Council in conjunction with Capire Consulting Group.

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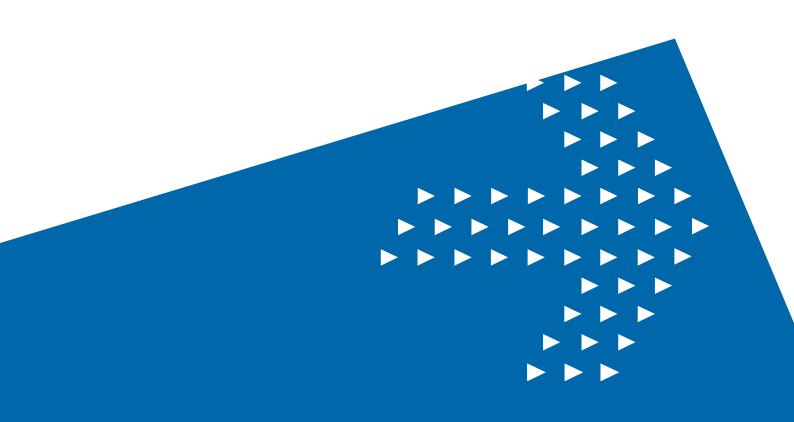
Report Purpose

The purpose of this report is to outline the key issues and feedback received on the proposals and actions of the draft Housing Strategy that generated the most responses.

The submissions and feedback have been sorted into seven themes, with the key issues generated within each theme highlighted, and followed by responses to the feedback raised about key issues. In some instances, it is proposed to make changes to the draft Housing Strategy to resolve an identified issue or implement and idea.

This 'Feedback Report' is to be read in conjunction with the 'Engagement Report', which is a higher-level report that focusses on presenting the numbers and frequency of commentary received during the community consultation period.

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Residential Framework (HOUSING STRATEGY CHAPTER 7):

There were **62 comments** received relating to the proposed residential framework, which is about the proposed pattern of residential density across Yarra Ranges. The comments were concerned with a number of matters including (but not limited to):

- More opportunities needed for growth;
- Locations where growth should be encouraged;
- Council should review subdivision controls at the interface between rural and urban land;
- The role of Yarra Ranges in Melbourne's overall development; and
- Implementation.

One change to the draft Housing Strategy is proposed based on the feedback received.

More opportunities for growth are needed		
Key feedback	Example comments	Response
There should be an analysis of larger lots across Yarra Ranges including green wedge land near townships, with potential changes to subdivision rules to allow more development.	"I am negatively affected by the current zoning which has restricted any productive use and resulted in a constant struggle to maintain vegetation growth, in stark comparison to the unit developments all along my property boundary." "We live on 3 acres within a 300 metre walk of the Wandin township but due to being green wedge we can't downsize and subdivide which would allow us to stay in our location as we age. It would also be an option for us to allow our children to build their own home at a more affordable cost."	The draft Housing Strategy has an action to review subdivision provisions in the Low Density Residential Zone (Action 15). For land in a Green Wedge Zone, it is not within Council's powers to authorise further subdivision. This power resides with the State Government. Allowing further subdivision in green wedge areas is contrary to planning policy, which seeks to protect green wedge areas for agriculture, recreation, tourism, and a range of other land uses.

There should be more allowance for growth in some townships, including in town centres.	"a certain percentage of new development will be lost to tourism related short- term accommodation, so a higher level of development would be required within these townships to ensure the housing needs of local residents can also be satisfied."	The draft Housing Strategy contains an action (Action 39) to prepare an issues paper to analyse the impact of short-term rental accommodation on affordability and local economies, which will form the basis of future strategies to address those impacts.
	"It is too simplistic for a large Shire like Yarra Ranges to implement a Housing strategy predominantly focused on significant housing growth only in the urban metropolitan western extent of the Shire."	The draft Housing Strategy plans for growth in townships. Residential development is now allowable in commercially zoned parts of all townships. The draft Housing Strategy plans for some medium density development in residential neighbourhoods of the larger townships of Mt Evelyn, Yarra Junction, Yarra Glen and Healesville. Housing growth in townships needs to be balanced with a range of factors, like seeking to manage bushfire risk, while providing for some more diverse and affordable housing options for local communities.
		State planning policy is to focus development into urban areas based around activity centres to maximise accessibility to facilities and services.
		The focus of housing growth occurring in the urban, western part of Yarra Ranges reflects anticipated housing need as set out in Chapter 5 Housing Needs.

Locations where growth should be encouraged		
Key feedback	Example comments	Response
Residential density should be encouraged close to shops and services, and transport.	Lilydale's commercial areas need more density. More density in activity centres is a good idea, provided it can be supported with adequate infrastructure.	The locations suggested for high and medium residential density are in proximity to shops, services and transport, and well served by infrastructure consistent with State and local policy already in the Yarra Ranges Planning Scheme. More urban density is planned in Lilydale, consistent with the Lilydale Structure Plan, 2022.
There is support for the townships identified for growth in the draft Housing Strategy.	Township areas identified for growth are important - Yarra Glen, Yarra Junction, Mt Evelyn and Healesville.	Support noted.

Council should review subdivision controls at the interface between rural and urban land

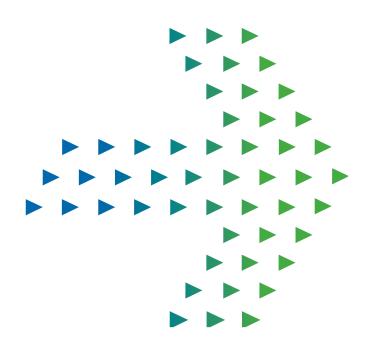
Key feedback	Example comments	Response
Review of the Low Density Residential Zone (LDRZ) subdivision rules should occur urgently to determine where further subdivision can occur.	"I urge the council to please continue to assess the low density zones in the Mt Evelyn area." "My family and I plead that council make this Action Item a priority due to the fact that we have been waiting more than 10 years for some kind of resolution and it would be extremely unfair for the affected home-owners to have to wait a further extended period of time for this resolution."	The draft Housing Strategy contains an action (Action 15) to review subdivision provisions in the Low Density Residential Zone as a short-term action (0-5 years) in the Action Plan at Section 13.2.
There is a need to protect green wedge land.	"Subdivision of the urban centre fringes should be avoided or minimised to maintain safe spaces to manage bushfire risk and habitat corridors for animals. It also helps reduce the risk of spreading weeds from residential lots to native bushland areas."	This is consistent with planning policy in the Yarra Ranges Planning Scheme and is supported by the draft Housing Strategy.

The role of Yarra Ranges in Melbourne's overall development

Key feedback	Example comments	Response
The idea to achieve residential growth in Yarra Ranges is misguided in an overall metropolitan context. Other areas of Melbourne should be prioritised.	"It is out of character to have more development in Mooroolbark and Kilsyth than in Ringwood and Croydon. As long as jobs and education are centralised to the city, we need a whole of Melbourne plan not a local council one."	Yarra Ranges is guided by State Government requirements to plan for a 15-year supply of housing growth (Clause 11.02 <i>Managing Growth</i> of the Yarra Ranges Planning Scheme). It is appropriate that Council sets the direction for housing for its municipality through its planning scheme.
		The Victorian Government has also recently announced it will be commencing consultation with the community on a new Plan for Victoria, to replace the current strategic plan for Melbourne, <i>Plan Melbourne 2017-2050</i> . This will include discussion around affordable housing and choice.

Implementation		
Key feedback	Example comments	Response
Council should identify potential development sites in townships.	There would be benefit in clearly identifying where small to large lots are available for development opportunities across townships	The draft Housing Strategy is a high- level document which will not articulate this level of detail. However, this may be done by further, place-specific Council strategies, such as structure plans or place plans.
Single dwelling covenants are a constraint to more housing diversity.	Council should do an audit of all covenants – some may exist which impede the draft Housing Strategy aims. "The single dwelling covenant is affecting progress." "We need to be able to have granny flats."	Covenants are restrictions placed on land titles that can limit development potential in some instances. Landowners or developers can seek to remove or vary a covenant as part of a planning permit application. Granny flats (now referred to as small second dwellings) were made easier to achieve by a State Government change to all planning schemes in December 2023 through Amendment VC253.

Other		
Key feedback	Example comments	Response
Green wedge areas should be used for residential development	"Why do we need high density when we have so much land? Why corral everyone into congested urban constructs where we can't breathe and are watched at every step through all these smart technologies? (all for our safety and convenience of course) I do not agree nor consent to any more high density subdivisions or higher density housing in our rural townships. We live out here because we want to be away from the city congestion."	Further subdivision and development of green wedge land is contrary to State Government planning policy that directs growth to existing settlements within the Urban Growth Boundary.
Monbulk - future medium density housing opportunities	There are concerns that potentially more land should be made available for Neighbourhood Residential Zone rezoning, to create viable redevelopment potential.	A new action is added: "Undertake a review of the Low Density Residential Zone areas in Monbulk that may be suitable for rezoning the Neighbourhood Residential Zone to enable modest infill development."



Neighbourhood Character

(HOUSING STRATEGY CHAPTER 8)

There were **29 comments** received relating to neighbourhood character. The comments were concerned with a number of matters including (but not limited to):

- Trying to control neighbourhood character will lead to less affordability and less viability of development
- Relationship of neighbourhood character to housing diversity and density
- High density housing issues
- Loss of trees and green space
- Lack of understand about what neighbourhood character is

No changes to the draft Housing Strategy are proposed based on this feedback.

Trying to control neighbourhood character will lead to less affordability and less viability of development

Key feedback	Example comments	Response
The proposed neighbourhood character controls will result in excessive planning permit applications.	"I believe this control will force nearly every single new detached house within Yarra Junction to require a planning permit, due to the encroachment of the 3 metre setbacks."	The proposed setbacks are not intended as planning permit triggers, and would be implemented as part of residential zone schedules. The standard zone and overlay permit triggers will continue to apply. In many cases, the proposed controls will be applied through the building system rather than the planning system. In Yarra Ranges, it is generally overlays that create planning permit triggers for single dwellings to consider other matters such as hazard or environmental impacts, rather than zones.

		1
The proposed neighbourhood character controls should be made less onerous.	"This control [side and rear setbacks] will increase the cost of housing, reduce and delay the supply of houses, reduce affordability and inundate the statutory planning department." Developers should be allowed to have more site coverage, and single storey, as this is more affordable than requiring less site cover and encouraging double-storey house design.	The proposed neighbourhood character provisions are contained in the <i>draft Neighbourhood Character</i> <i>Study 2021</i> that have been tested against several lot development outcomes, that concluded that the provisions will not unreasonably impact the viability of new development. Subdivision will be allowable and viable in urban areas, but the intensity of development (site cover, setbacks, walls on boundary, for example) will be tailored to the preferred neighbourhood character of each local neighbourhood area.
		Site cover controls are intended to allow spacing around future buildings for gardens and landscaping. In some areas, relatively large areas are required in order to respond to preferred character as set out in Chapter 8 of the draft Housing Strategy. Where a certain house size is sought that would exceed the site cover figure, either a larger land area is needed, or a different design approach, such as double storey is required. The draft Housing Strategy seeks to balance the need for new development and housing, with the need to maintain the valued aspects of distinct neighbourhoods.

Relationship of neighbourhood character to housing diversity and density

Key feedback	Example comments	Response
Preserving neighbourhood character may conflict with the objective to increase density.	"Any increased density should not negatively impact the overall neighbourhood character of Yarra Ranges." "What does it mean to preserve neighbourhood character? We can't fool ourselves; we will affect neighbourhood character, but we need to in order for housing to be available and affordable – the question is how much are we willing to sacrifice neighbourhood character for the provision of urgently needed housing?" In achieving more density, neighbourhood character will invariably need to change, and this needs to be acceptable as a principle, and needs careful management. Some ways to help manage the conflict may be: Design strategies to keep the essence of neighbourhoods while allowing growth; Locating increased growth in identified zones near services.	 The draft Housing Strategy seeks to respond to these concerns by: Identifying areas for varying levels of growth and change. Articulating how neighbourhoods will change, and altered expectations of character in areas where growth will occur (known as preferred character statements). Proposing future development settings in all neighbourhood character precincts, such as site cover and height. These are intended to enable a particular level of change to occur whilst keeping valued character aspects, such as spacing between buildings, landscaping, views, and other features.

High density housing issues		
Key feedback	Example comments	Response
Higher density housing needs to be well designed.	"No housing commission lookalikes. Stepped back stories, no visible washing lines. Green walls, rooftops. Places for bins and clotheslines & reasonable parking spaces and room for fire trucks to get through on the roadway." "One dimensional concrete/brick walls should not be approved." "Will multi-level buildings have green rooves and communal garden/ socialising areas?"	High density housing opportunities (4 storeys and above) are limited to the central commercial areas of the Major Activity Centres of Lilydale and Chirnside Park, and Large Neighbourhood Activity Centres like Mooroolbark. In Chirnside Park and Mooroolbark, there are planning controls already in the Planning Scheme to achieve the desired design outcomes. In Lilydale, a planning scheme amendment is currently in preparation to implement the actions of the Structure Plan, 2022, that will guide future higher density residential development.

Loss of trees and green space		
Key feedback	Example comments	Response
Too many trees and too much garden space is being removed.	"No one seems to be noticing the de- forestation of this once green area. It is becoming unliveable. Too many townhouses and not enough trees." Loss of backyards to development is regrettable, but probably needed to achieve more housing.	The suggested development settings in the draft Neighbourhood Character Study 2021 aim to achieve better design outcomes in residential areas, with more spacing around buildings and more space for landscaping and planting of canopy trees.
Parkland is part of neighbourhood character too, not just houses.	"There should be some minimum standards to ensure open space and parklands are included in any development. For example, for every 50 houses there must be an open space or parkland. There are too many developments that look like a sea of housing with not a green leaf in sight."	Yarra Ranges Planning Scheme requires 5% contribution for public open space as part of subdivisions of over two lots (Clause 53.01), which provides for some shared open space as part of large subdivisions. Requirements for larger parkland areas will be addressed by the review of Council's Recreation and Open Space Strategy which is currently in preparation.

What is neighbourhood character?		
Key feedback	Example comments	Response
Neighbourhood character controls should not limit aesthetic taste.	"limiting building styles, materials, etc limits the natural grain of a community where change naturally occurs over time as tastes change and we respond to social, environmental and construction cost issues differently to the past."	It is agreed that there are some issues neighbourhood character should not seek to control, including architectural styles. The proposed controls seek to avoid this, whilst setting some parameters around colours and materials to ensure development fits within the landscape.
The concept of neighbourhood character is too subjective.	"subjectivity can make it difficult to manage a client's expectations and tastes vs the objectives which are subject to interpretation."	Councils are required by State Government to undertake a neighbourhood character study when preparing a Housing Strategy, as this is a key component of a housing framework. The Victorian Government has a definition of neighbourhood character, which is included in Section 8.1 of the draft Housing Strategy.
Neighbourhood character relates to cultural values, not just physical built form.	Maintaining neighbourhood character is not just about physical characteristics like building heights, but about preserving a sense of shared values and community.	Noted. Refer to response above about how neighbourhood character is defined.

Other		
Key feedback	Example comments	Response
Preferred character in Monbulk	Preferred characteristics in Monbulk (NCS p.38) should not include 'Sealed roads with no kerbs and footpaths. Roads to perimeter of town are unsealed'. This is not preferred by Monbulk residents.	This wording is taken from a description of existing neighbourhood character in the Neighbourhood Character Study 2021, p.38. It is not in the draft Housing Strategy as representing a preferred future character.
Neighbourhood character precinct objectives	The neighbourhood character chapter of the draft Housing Strategy is generally good, and a good reflection of existing and preferred character.	Support noted.
Conflict between neighbourhood character controls and planning for bushfire risk	In Warburton, encouraging prominent landscaping in front and rear setbacks, and cottage/chalet style dwellings (with complex roofs and eaves), is inconsistent with CFA design guidelines.	Cottage/chalet style dwellings are not encouraged in the draft Housing Strategy, but they are described as a common type of building that is one aspect of current neighbourhood character in Warburton. Bushfire risk varies by site and location. When new buildings are proposed, planning decisions will need to balance a range of policies to reach a good design outcome, including neighbourhood character and bushfire risk. Any planning applications for buildings in the Bushfire Management Overlay will need to consider the comments of the relevant fire authority.

Housing Diversity (HOUSING STRATEGY CHAPTER 9)



There were **81 comments** received relating to housing diversity. The comments were concerned with a number of matters including (but not limited to):

- Tiny houses
- Housing for people with a disability and ageing people
- Cohousing as an affordable housing option
- Multi-generational housing
- Need for a better range of dwelling options

Three changes to the draft Housing Strategy are proposed based on this feedback.

Tiny houses		
Key feedback	Example comments	Response
Tiny houses can provide needed small accommodation if regulated appropriately and should be encouraged in the planning system.	"Tiny homes could assist elderly family members or dependants on a family property if in the right situation and only if that does not directly have any ongoing effects to the surrounding area and residents." "We definitely need a wider mix of homes, especially for people downsizing and single people. Also support for tiny homes and less red tape around them."	It is acknowledged that there is a lack of clarity over the regulation of tiny houses in the planning system. Action 22 is amended, with Council to seek legal advice on the issue and provide clarified information to the community. The Victorian Government made changes to all planning schemes in December 2023 to make small second dwellings (SSD) easier to achieve, with less regulation than in the past. SSDs can include moveable structures. SSDs must be: No larger than 60sqm; On the same lot as an existing dwelling; Used as a self-contained residence; And must Include: A kitchen sink; Food preparation facilities; A bath or shower; and A toilet and wash basin Depending on which zone or overlays apply to a property, SSDs now generally only require a building permit.

Council should be more pro-active on encouraging tiny houses, i.e. not just advocating to State Government for a formal definition, but changing its own local laws.	"It is not enough that the YRC handball responsibility to other levels of government ie 9.8 Actions: Advocate to the State Government for a formal Planning Scheme definition for tiny houses, and clarity and guidance on their assessment and regulation in the Victorian planning system." "I would like the Shire of Yarra Ranges to follow the precedent sent by the Mount Alexander Shire, and create a transparent framework that allows TINY HOUSES to be legally located on land with an existing dwelling."	As above, Amendment VC253 reduced regulation for small second dwellings across the State which now enables landowners seeking a small dwelling option to achieve this without significant regulatory cost or burden.
Tiny houses on wheels	Tiny houses on wheels should be allowed as the only structures on a block (not just in association with an existing house), and with less onerous planning requirements. Tiny houses on wheels should not need a building permit. Tiny houses on wheels may be a solution to seasonal workers accommodation, given they are temporary and moveable.	As discussed in the draft Housing Strategy Section 9.3.1 <i>Tiny Houses</i> , these can occur in a number of different scenarios, each with different regulatory implications. Tiny houses on wheels need a building permit if they are used as a primary residence, which is necessary to protect lives and property. The suggestion for tiny houses as a solution to seasonal workers' accommodation is noted. The draft Housing Strategy contains an action to "Advocate to the Minister for Planning to consider planning permit exemptions for rural worker accommodation in the Green Wedge Zone" (Action 33). Moveable structures can be considered as part of this advocacy.
Tiny house villages	Tiny house villages should be encouraged as an affordable housing option, especially on public land.	Noted. The draft Housing Strategy contains an action to "Develop and endorse a Social and Affordable Housing Policy" (Action 34). As part of this future policy, tiny house villages as one solution to achieve more social and affordable housing, can be explored.

Housing for people with a disability and ageing people		
Key feedback	Example comments	Response
Council needs to consider appropriate house design.	 "The older population need a single storey, minimum two-bedroom unit with two car places, walking distance to the shops. They want to get out of their driveway any time of the day. Why? They struggle with stairs They want independence, so two cars They will one day have to give up their licence." Some unit development should have smaller outdoor spaces and garden area, making it more suitable for ageing and disabled people due to reduced maintenance. 	The draft Housing Strategy contains an action to "Consider the need for a Housing Design and Diversity Strategy, consistent with section 9.7" (Action 25). It is proposed to amend this action to add " Undertake a Housing Design and Diversity Strategy ". This work will consider the matters raised in submissions on this issue, and will be translated into planning scheme controls.
Housing type and location.	Older people could live in apartment style housing in activity centres, and this should be considered as one option, alongside retirement villages, more accessible and smaller units, etc, to provide an array of choices.	Noted. The draft Housing Strategy encourages higher density housing (apartments) in large activity centres, suitable for ageing people, which are subject to accessibility requirements under the planning and building regulatory systems. The 'Housing Design and Diversity Strategy' referred to above will explore how unit and townhouse development can be more suitable and accessible for ageing people.
Accessibility	All high-density housing should be designed for accessibility, and all lower floor dwellings should be appropriate for wheelchair access.	All apartment development is already required to be designed for accessibility under the Yarra Ranges Planning scheme (Clauses 55.07-8 Accessibility objective) and 58.05-1 Accessibility objective).
	Accessibility is not restricted to house design, but relevant to footpaths, parking areas, wheel-chair friendly streets, and other infrastructure issues.	Equity of access is a key issue for Yarra Ranges identified in Council's Integrated Transport Strategy 2020- 2040 (ITS), and is addressed through implementation of the ITS.

Key feedback	Example comments	Response
Co-housing needs to be encouraged.	"Co-housing should be encouraged as an affordable housing option." The Strategy should support co- housing and sustainable community- focused housing models. Community living/village type living should be allowed for a range of ages. A good example is Narara Ecovillage, NSW. This should also be allowed in rural areas.	Co-housing is a housing option in Yarra Ranges and other parts of Victoria. There is general Council support in the draft Housing Strategy to explore innovative housing solutions with an affordability focus, however each individual proposal will need careful consideration before Council can reach a position of support. Cohousing is not allowed in the Green Wedge in Yarra Ranges, where only one dwelling per lot is allowable under State provisions in Green Wedge zones.

Multi-generational housing should be made easier to achieve		
Key feedback	Example comments	Response
Rural land should be able to accommodate multiple houses	"If accommodation cottages can be built on a property, why not multiple dwellings for family members? This would go a long way to alleviating the housing crisis in the Yarra Ranges, there are already families in the Shire who have acreage with only one house on it."	As above, the Green Wedge zones set by the State Government do not allow for more than one dwelling per lot. The recent Small Second Dwelling provisions introduced by the State Government provide an option to apply for an SSD subject to a planning permit.
	"Our family has 10 acres of land along a residential street, approximately 1500m from the town centre, however restrictive zonings do not allow us to provide any of this land to children and grandchildren to build on. If these land parcels were made available to share, then affordability would be greater."	
Large residential blocks should be allowed to have multiple granny flats.	"The Strategy should support multi- generational housing opportunities on large blocks to allow multiple residents and/or multiple generations to live on one property through tiny homes/ granny flats."	As above, the recent Small Second Dwelling provisions introduced by the State Government provide an option to apply for an SSD subject to a planning permit. This is limited to one SSD per lot, as there are implications for neighbourhood amenity, rubbish collection, and on-street parking.

Yarra Ranges needs a better range of dwelling options		
Key feedback	Example comments	Response
The lack of diversity impacts communities staying together.	Lack of housing choices is fragmenting communities. Older residents and young families are moving to find more suitable accommodation. "When I was looking at a smaller living option for myself (55 year old empty nester in Warby) there was nothing."	 The draft Housing Strategy recognises there is a lack of diversity, and proposes strategies to address this, which include: More residential density in and around large activity centres Preparation of a Design and Diversity Strategy which will inform changes to the Yarra Ranges Planning Scheme to achieve a larger range and diversity of dwelling types and sizes in well located areas.
Yarra Ranges needs different sizes and types of housing.	"The average family wants a 3 bedroom home/unit - we have too many 2 bedroom units bring built. We want kids to walk to schools so near schools 3 bedroom units need to be encouraged." More apartments and smaller dwellings are needed.	Noted. The issue of unit sizes will be investigated as part of the 'Housing Design and Diversity Strategy' at Action 25.

Other		
Key feedback	Example comments	Response
People need the opportunity to build granny flats.	Tiny houses and granny flats should be more affordable and easier to achieve, not only in the urban area but also in more rural areas and towns. This will create more rental options.	As above, regulation has been reduced for small second dwellings (SSD) at a State Government level, which now enables people seeking a small dwelling option to achieve this without significant regulatory cost or burden.
Council should identify ways the existing housing stock can be better used.	Landowners should be allowed to retrofit existing dwellings for dual-occupancy.	The draft Housing Strategy contains an action to investigate this issue and provide information to the public for clarity (Action 24).
Residential land lease sector	The draft housing strategy does not mention the residential land lease sector, which is increasingly significant as a sector	It is proposed to add a new section explaining the Residential Land Lease sector.
Safety of access	New development needs effective access and egress, in case of flooding.	The planning scheme contains requirements for development in areas prone to flooding. Safe access is a key consideration.

Housing Affordability (HOUSING STRATEGY CHAPTER 10)



There were **46 comments** received relating to housing affordability. The comments were concerned with a number of matters including (but not limited to):

- Achieving more affordability as a priority
- Council's role in social and affordable housing
- Planning-related over regulation
- Relationship between density and affordability
- Constraints to affordable and diverse housing

No changes to the draft Housing Strategy are proposed based on this feedback.

Achieving more affordability is a priority		
Key feedback	Example comments	Response
The lack of affordability is a huge issue.	"We don't have choices [there is] no hope if people can't buy a house or live in the place that they would like, close to family".	Noted. This matter is discussed further in Section 10.3 the draft Housing Strategy.
	Some young people may never be able to own a house.	
	There is a big need for affordable options for single women.	
	"As we witness a reduction in permanent resident housing and rental availability, it is important to note the direct flow on effect to diminished social cohesion and subsequently community resilience."	

Council's role in social and affordable housing		
Key feedback	Example comments	Response
Council should be more proactive in getting more social and affordable housing.	Council should "explore opportunities to redevelop existing unused buildings into social housing. For example, in Warburton we have the Hospital, the Sanitarium Factory and the Cerini Centre sitting empty. If these were redeveloped and managed by Not for Profit or Social Enterprises we would create a small but significant increase in social housing, allowing young families to save, and elders to retire comfortably." The Strategy should identify how Council will support social and affordable housing initiatives, such as co-living projects and/or utilising existing land and assets like old schools.	Chapter 10 Affordability of the draft Housing Strategy contains an extensive actions list, which includes actions for Council to explore use of Council land, and potentially State Government owned land for social and affordable housing, and to carry out feasibility studies on potential sites. It would be inappropriate for Council to actively investigate use of privately owned land, unless approached directly by a landowner. Co-living, or co-housing is allowable under current planning regulations. The degree of Council support will vary depending on the details of each specific proposal. The draft Housing Strategy discusses co-housing as an innovative housing solution at Section 9.3.5.
Council should encourage social housing.	Council should "stop NIMBYism and increase social housing." "…large land/property owners with green or brown field sites that are located within the areas identified for higher density development should be required to provide or set aside a percentage of their sites for affordable housing."	Chapter 10 includes and action to develop a Social and Affordable Housing Policy, which will set out Council's position on social and affordable housing (Action 34). This policy would be publicly exhibited and explain to the local community the need for SAH, constraints, and opportunities to achieve it, as a means to raise awareness, and reduce local opposition when specific proposals are made. Chapter 10 includes an action to advocate for 'inclusionary zoning' which is a means to capture any value uplift at rezoning stage for social and affordable housing purposes (Action 37).

Planning-related over regulation		
Key feedback	Example comments	Response
Planning and related approval processes are too cumbersome.	 "town planners hold up a development, forcing a VCAT hearing that will add extra costs to the proposed development and an added cost to ratepayers." "housing affordability and meeting demand is critically affected by [slow and lengthy] approval processes." The Strategy "remains silent on what Council specifically proposes to do beyond setting said targets. As drafted, the Strategy has a narrow focus on Planning Scheme Amendments as the solutions, without addressing the mechanical and administrative issues which prevent timely housing delivery in already zoned areas, consistent with the existing Planning Scheme." 	As part of the development of a Social and Affordable Housing Policy, Council will explore the pathways to encourage and support SAH, including potential fast-tracking of relevant development proposals incorporating SAH through the planning permit approval process. In September 2023, the State Government introduced a fast-track process for a significant residential development with affordable housing (Clause 53.23 of the Yarra Ranges Planning Scheme), which assists to address this concern about excessive regulatory burden.

Relationship between density and affordability		
Key feedback	Example comments	Response
Smaller, denser housing will improve affordability.	"Increasing density in some areas and in a controlled "sensible" way will help address affordability issues." "we can't afford big blocks of land with single houses [we] need more opportunities for multi-unit development in residential areas."	Noted, these statements are consistent with the draft Housing Strategy's objectives to increase housing diversity as further outlined in Section 9.7.
Smaller, denser housing does not always equate to better affordability.	Smaller, higher density housing does not always mean cheaper. It could mean luxury apartments with a high price tag.	In an outer-urban context, this is unlikely. However, the performance of the Housing Strategy will be monitored.

Constraints to affordable and diverse housing

Key feedback	Example comments	Response
Yarra Ranges has specific constraints.	In the future a lot of new housing will be through infill development and subdivision, rather than large-scale subdivision as per Kinley because Yarra Ranges does not have many large development sites, meaning scope to achieve social housing will be relatively limited.	Noted. Council will investigate all options for inclusion of social and affordable housing as part of infill and new development. This will be explored further in the Social and Affordable Housing Policy.
Cultural change is needed.	Increasing density needs cultural change – people need to be more willing to accept living closer together.	Noted. This change will happen slowly and is beyond the scope of the Housing Strategy to directly address.

Other		
Key feedback	Example comments	Response
Location of affordable housing	Affordable housing should be strategically located near shops and services, not isolated.	Noted. This is consistent with the draft Housing Strategy and will be a key consideration in the creation of a Social and Affordable Housing Policy.
Council should put strategies in place to compensate for the loss of housing due to the rise of short-term rental accommodation (SRTA).	The Housing Strategy should detail what Council will do to assist displaced residents as a result of the increase in STRAs.	Chapter 10 <i>Affordability</i> contains an action to develop an issues paper on short-term rental accommodation (Action 39). Following on from that work, actions can be identified to address housing issues associated with STRA.

Environmental Sustainability

(HOUSING STRATEGY CHAPTER 11)

There were **20 comments** received relating to environmental sustainability. The comments were concerned with a number of matters including (but not limited to):

- Council's role in sustainability
- Conflict between sustainability and affordability
- Sustainability initiatives
- More policy is needed on sustainability

Two changes to the draft Housing Strategy are proposed based on this feedback.

Council's role in sustainability		
Key feedback	Example comments	Response
Council needs to think about sustainability at a precinct level, rather than site by site.	Electric vehicle charging stations could be made available by precinct, with incentives to take up electric vehicles. Council should invest in end of line water retention areas that each developer contributes to via developer contributions, rather than on-site retention per site. "I think one of the fundamental items to meet your long-term housing strategy should be for the Council to tackle community power grids rather than leaving this up to individuals across the board. Many residents won't be able to meet the need to have sustained sunlight due to tree coverage to make solar on their block viable."	This suggested approach is noted. The draft Housing contains an action to monitor the effectiveness of Clause 15.01-2L Environmentally Sustainable Development in the Yarra Ranges Planning Scheme, with a view to future refinements if necessary (Action 55). It is proposed to amend this action to make specific reference to considering a need for planning at a precinct level, for a more comprehensive approach to sustainability planning issues.

Conflict between sustainability and affordability

Key feedback	Example comments	Response
Environmental sustainability is not more important than housing affordability.	In the conflict between sustainability initiatives and getting more affordability, it is affordability that should be more important.	It is acknowledged that sustainability requirements can add time, regulation, and ultimately cost to development. It is proposed to include a new action:
	"Sustainability requirements need to have some flexibility, to avoid requirements that add unnecessary cost to development." "The building regulations should be the key tool to development of sustainable development, as often the cost of construction of sustainable housing initiatives can be substantially higher than more traditional constructions techniques, which could be detrimental to affordability." "The complex formulas required for water-sensitive characteristics mean it is difficult to find the appropriate engineers and then difficult to get it through Council's engineers, which can delay a project by up to a year."	"Monitor the impact of Clause 15.01- 2L Environmentally Sustainable Development on planning approval timeframes and planning application costs, with a view to future amendments to the policy."

Sustainability initiatives		
Key feedback	Example comments	Response
There are various opportunities to achieve more sustainability.	"Continue programs like solar systems and also support new ideas and developments in this area." "Homes that gather energy without having to pay electricity charges are needed." Buildings need better orientation for	These suggestions are noted and generally consistent with the draft Housing Strategy.
	sustainability.	

More policy is needed		
Key feedback	Example comments	Response
Policy for sustainability needs to be broader.	Policy should discourage black roofs, and discourage buildings with no eaves. "We need for Council to provide guidance and a larger framework rather than being too specific."	This is addressed by Action 57 of the draft Housing Strategy: "Consider the need for additional strategies for inclusion in Clause 15.01-2L (Environmentally Sustainable Development) in the Yarra Ranges Planning Scheme, such as for lighting in new subdivisions, passive design strategies, and food production areas."

Other		
Key feedback	Example comments	Response
Increased housing density is inherently wrong.	Increased density is the antithesis of environmental sustainability, and therefore should not be allowed.	The comment is noted, but is not reflected in the draft Housing Strategy. Increased density and co-location of housing with services, infrastructure and transport is a more sustainable form of urban development than fragmented, low density development. The draft Housing Strategy's focus in on how to accommodate State Government growth requirements in a way that best serves the local community, local economy, and the environment.
Heat island effect	It is important to reduce the heat island effect through urban greening.	Noted, the draft Housing Strategy contains strategies to address the heat island effect (Section 11.3 <i>Planting and biodiversity)</i> .



There were **42 comments** received relating to infrastructure. The comments were concerned with a number of matters including (but not limited to):

- Timing of infrastructure delivery in relation to urban development
- Planning for parking
- Planning for parkland and open space
- Specific infrastructure suggestions

One change to the draft Housing Strategy is proposed based on this feedback.

Planning for parkland and open space		
Key feedback	Example comments	Response
There is a need for more parkland in the urban area.	"The parkland is minuscule and the council should be buying up land to turn it into parks and green space rather than let so much housing take over." Need to keep parks, not lose these to development.	Council's Recreation and Open Space Strategy 2013-2023, is currently being updated and will further address this issue.
Council needs a new open space strategy.	"Some of the infrastructure projected needs, for example parks and open spaces, require updates of other strategies such as the Open Spaces Strategy."	Noted, as above.

Key feedback	Example comments	Response
Before new housing is allowed, existing infrastructure	"There is no point creating higher density housing without upgrading the roads."	Roads and drainage infrastructure responsibility is shared between Council and other agencies.
(drainage, roads, and other infrastructure) needs to be repaired and improved.	"Before thinking about growing higher density housing, perhaps the focus should be on fixing basic and broken existing infrastructure to stop flooding into people's homes!" Inadequate drainage and drain maintenance is causing increased risk of flooding, property damage,	In relation to local roads (managed by Council), Section 12.3.1 <i>Traffic</i> explains that the Housing Strategy has sought to reduce allowable development density in some identified residential areas through the application of revised zones, to reflect road capacity. In other areas, Council regularly reviews traffic capacity of local roads and intersections to determine a program for priority improvement works.
	program for priority improvement works. In relation to local drainage (managed by Council), Section 12.4.2 <i>Reticulated drainage</i> <i>system</i> of the draft Housing Strategy identifies a need to improve the coordination of planning for housing with infrastructure planning, which is being addressed by preparation of a Municipal Stormwater Management Plan. In relation to other relevant infrastructure agencies such as Melbourne Water and the State Government Department of Transport and Planning, the draft Housing Strategy contains actions to work collaboratively with these agencies, including an action to advocate to the State Government	
		for improved public transport and road infrastructure in large activity centres and Substantial Change Areas (Action 67). There is a separate action to adopt a Council Stormwater Management Plan (SMP) (Action 65). The SMP will clearly identify Council's role in relation to other agencies, and how Council can work with key partners effectively.

Timing of infrastructure delivery in relation to urban development

Drainage and flooding in Lilydale needs special attention, given its proposed residential growth.

Given the proposed build and approval of medium to high density housing along Main Street, Cave Hill Road and Beresford Road, I hope you are ensuring that the infrastructure is in place that prevents exposing them to flooding risk.

How will Yarra Ranges Council minimise the potential impacts of water, sewerage and drainage assets on the environment given that is no upgrade and maintenance planned of the existing stormwater and drainage infrastructure?

If Yarra Range Councill increase the density of the development in these streets proposed in the housing strategy this will increase the proportion of volume of flooding. Under the Housing Strategy, certain parts of Lilydale along Main Street and Cave Hill Road are proposed for rezoning from a Residential Growth Zone (RGZ) to an Activity Centre Zone (ACZ), allowing for slightly higher densities than currently permitted under the RGZ. Any future development within these zones will be required to incorporate on-site stormwater detention and onsite water treatment, in accordance with the Council's Development Engineering Guidelines. Site permeability standards will be maintained to ensure that the proportion of pervious surfaces remains consistent with current planning guidelines.

To proactively manage stormwater and flood risks associated with growth, the Council is developing a new Stormwater Management Plan (SWMP). This plan will address gaps in stormwater management and provide strategic and operational guidance for decision-making. The SWMP includes flood catchment prioritisation, integrating residential growth changes identified in the Housing Strategy with other criteria such as flood hotspots and Directly Connective Imperviousness (DCI) changes (i.e., how much 'hard surface' drains directly to waterways now, and how much this is expected to change in the future).

Urban development and increased residential density do not necessarily equate to a worsened impact on flooding and local drainage, these impacts can be effectively managed through the integration of adequate stormwater management features such as appropriate finished floor levels, detention systems, and onsite water treatment. Council's SWMP and Engineering Development Guidelines outline specific requirements for future developments to achieve this goal.

		 Council is also partnering with Melbourne Water to undertake flood modelling of entire municipality. This initiative aims to provide several benefits: Gather detailed information on the existing drainage network and keep this updated overtime as new assets are introduced. Gain an understanding of the likely flood extents, depths, velocities and hazards across the municipality in current and future conditions, including natural flow paths. Prepare flood mitigation projects for inclusion in Council's Capital Works Program. Provide advice around appropriate development in flood affected areas.
Areas shown for growth need footpaths.	Some areas near activity centres lack footpaths which needs to be addressed. Council needs a strategy for this.	Noted, Council is preparing a framework for footpaths delivery, which will further address this issue. This work is consistent with the Yarra Ranges Integrated Transport Strategy 2020- 2040.

Planning for parking		
Key feedback	Example comments	Response
New development needs better consideration of parking impacts.	"Car parking allowance (via a dedicated cemented area on the nature strips) must be considered and implemented. This allows traffic on those streets to flow seamlessly without having to manoeuvre around parked cars on the road." Need to restrict on street parking in some areas with narrow roads as it is difficult to drive down some roads now. New developments need more parking on site.	On-street parking is addressed at Section 12.3.2 of the draft Housing Strategy, with strategies proposed to better manage this including potential further use of parking restrictions in areas experiencing residential growth. Any strategies used will be monitored over time for how effectively they perform, with a view to improvements if needed.

Parking for transport infrastructure needs improvements.	"Lilydale station car park is usually full. You want more people in the area we need parking at the station to cope with this." "I would love a car park in places like Coldstream, Healesville etc. Where you can park your car and catch a bus to the station."	Noted. Parking at Lilydale Station is a known issue that is addressed in the Lilydale Structure Plan 2022, with a suggestion for a future multi-level car park. It is proposed to add an action to request Public Transport Victoria to investigate the need for park and ride facilities in Yarra Ranges, with a focus on providing travel options for commuters from Increase Changes Areas in Healesville, Yarra Glen, Yarra Junction and Mt Evelyn, to established public transport services.
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Specific infrastructure suggestions		
Key feedback	Example comments	Response
Some major infrastructure is needed to support more housing.	"Kinley's impact on the intersection of Hull Road is unviable. The rail line should be duplicated between Lilydale and Mooroolbark." "Lilydale needs a bypass road."	The Lilydale Structure Plan 2022 (LSP) contains actions to advocate to the State Government for rail duplication (LSP Action A22), to advocate for a Lilydale Bypass (LSP Action A16), and to upgrade the Mooroolbark Road/Hull Road underpass and road connection to Eastlink (LSP Action A26).

Other		
Key feedback	Example comments	Response
Planning for transport	Kinley's development will affect traffic congestion in the area negatively.	It is acknowledged further planning for transport is needed, which is consistent with the draft Housing Strategy.
	Better bus services are needed in Yarra Ranges, and potentially smaller buses that can run more often	The development of Kinley is accompanied by a range of developer-funded road and intersection improvements. The road network in the area will be monitored over time, as occurs in other residential areas, to identify priority areas for improvements. The Yarra Ranges Integrated Transport
		Strategy 2020-2040 also contains actions to improve bus and public transport services and facilities.

Other Feedback

There were **78 comments** received relating to other themes and concerns. This included (but was not limited to):

- The conflict between tourism and housing for locals
- Short-term rental accommodation
- Bushfire risk
- Public engagement on the draft Housing Strategy

No changes to the draft Housing Strategy are proposed to be made based on this feedback.

The conflict between tourism and housing for locals		
Key feedback	Example comments	Response
Council's tourism focus undermines the interests of the local population on housing.	"The Housing Strategy does not appear to have considered impacts caused by tourism on housing. Warburton, Healesville and the Dandenong Ranges rural townships are highly attractive tourist destinations. This will be exacerbated by the Warburton Mountain Biking Destination Project." "I request Council halt development on the Warburton Mountain Bike Destination until the housing situation is properly addressed. Deliberately following a policy of attracting overnight visitation when there is inadequate accommodation must stop until there is adequate housing for all."	The draft Housing Strategy contains an action to develop an issues paper on short-term rental accommodation, its impacts on affordable rentals and the local economy (Action 39). This will be a critical piece of work to understand the issue, its impacts, and develop strategies and actions to address this.

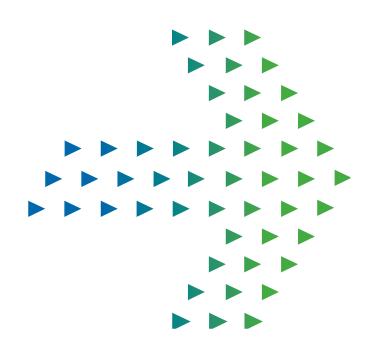
Short-term renta	l accommodation
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Key feedback	Example comments	Response	
Key feedback There needs to be better regulation of short-term rental accommodation, like Airbnb.	 Example comments "Regulation for short stay rentals a density limit in our residential areas there are too many. 1 in 4 houses in our street have been converted that one time were long term rentals they sit mostly empty now." "I also request the Shire of Yarra Ranges: to create a register of all STL as a top priority and require all STL to be licenced to ban all multi-listers within the Yarra Ranges Shire. Investor buying should be deterred by prohibiting entire home letting for more than owning one holiday home Australia-wide. 	Response As above, Action 39 will explore the issue and develop strategies and actions to address this matter.	
	more than owning one holiday		
	Every STRA should be required to have a host present on site to manage guest behaviour, like a hotel would need to do.		

Bushfire risk		
Key feedback	Example comments	Response
There needs to be more consideration of bushfire risk and how this relates to residential development.	"The Warburton Neighbourhood Character statement seeks to retain and protect significant vegetation. Planting of native vegetation is also encouraged in the rear yard. Has this "preferred character" been considered in relation to bushfire risk." "In the event of a bushfire, issues such as water pressure and traffic congestion could be critical if high density living escalates. The infrastructure is not up to an acceptable standard to allow for higher density living in the Yarra Ranges."	The draft Housing Strategy only encourages high density housing (apartments and mixed-use buildings) in large activity centres where access to services and infrastructure is good, and bushfire risk is very low. In relation to Warburton, the Bushfire Management Overlay applies to extensive areas in and surrounding the township, which directs planning decisions. The neighbourhood character section of the draft Housing Strategy does not consider bushfire risk, as this section contains a neighbourhood character assessment only. It is the role of the planning permit decision making process to balance competing objectives in favour of orderly planning.

Public engagement on the draft Housing Strategy

Key feedback	Example comments	Response
Key feedback There are problems with the way public engagement occurred.	Example comments "I found the Plan diagrams difficult to interpret other than the few enlargement plans which seemed to be focused on the key metropolitan urban areas." "The first problem with the Yarra Ranges Housing Strategy 2023 Draft is that it is the final consultation. With so much of the actions being 'drawing up of policy, reports, plans and frameworks' Where is the ideas, plans, policiesWhere are the facts. The public needs to be informed on the outcome of these and then to have input into any proposed concrete actions stemming from them. More community engagement is required."	ResponseThe plan diagrams in the draft Housing Strategy were supported by an interactive map on Council's website, where people could look up details relevant to specific properties or areas.The community has been consulted on the development of the Housing Strategy through two rounds of consultation. The first stage of public engagement occurred in 2022 on the Housing Strategy Discussion Paper.A second round on the draft Housing Strategy occurred in late 2023 and included extensive community engagement including focus groups open to any member of the community to register to attend, structured around
	Council should offer the signatories of a petition regarding flooding in Lilydale, a facilitated focus group to "discuss in detail local drainage and surrounding roads and services infrastructure."	A focus group was not held specifically on the subject of infrastructure, however this matter was discussed in the focus group sessions.



Public agency submissions

A submission was received from the Country Fire Authority, which raised the following issues, in summary:

Key points	Response
The draft Housing Strategy should better articulate how residential change areas (Chapter 7) are affected by bushfire policy, and how it directs development to low-risk areas.	Noted, further content will be added to Chapter 7 to clarify this issue.
The draft Housing Strategy should assess whether the areas it identifies for growth are the most suitable in terms of bushfire risk, or whether other locations may be preferrable.	Noted, further commentary will be added to Chapter 7 to address this issue.
All new policy, such as neighbourhood character and landscaping requirements, should be assessed for whether it may exacerbate bushfire risk.	Further work will be done as part of preparing a planning scheme amendment to implement the Housing Strategy, to ensure there are no policy conflicts. Currently, landscaping and construction requirements in areas of bushfire risk are directed by the Bushfire Management Overlay, and the comments of the relevant fire authority on specific planning applications. This approach will continue under any new housing framework.
Assessment of Low-Density Residential Zone (LDRZ) areas for ageing in place should be extremely limited, and well supported by bushfire analysis, as many of these have bushfire risk.	Action 15 to review the subdivision provisions of the Low- Density Residential Zone will include a bushfire analysis. The scope of that work will be a review of the application of the Low Density Residential Zone across Yarra Ranges, consistent with community feedback.