



Submission to *Plan for Victoria – Big Ideas for Victoria’s Future, and Housing Targets*

27th August 2024

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Introduction

Yarra Ranges Council welcomes the opportunity to provide feedback on the *Big Ideas for Victoria's Future* and the recently announced proposed housing targets for Victoria. Council's response and suggestions are further discussed below.

Big Ideas

Big Idea 1 – More homes in locations with great public transport access

Prompt questions:

- What do you think we should do to prioritise homes close to public transport, services and shops?
- Where would you like to see more homes in your local area?

In order to prioritise homes, close to public transport, services and shops, the following is recommended:

- Explore assistance that can be offered to land developers in investigating and addressing land contamination issues.
- Explore incentives and mechanisms to encourage land consolidation, in order to realise new large land holdings for high-density and mixed-use development.
- Explore the potential to provide assistance to Councils to address parking shortfalls in activity centres where there are proposed increases to residential density, such as assistance with financing of new multi-level car parking structures.
- Prioritise Melbourne Water drainage upgrades in and near principal, major and neighbourhood activity centres subject to flooding.
- Identify a broad range of activity centres in inner and middle-ring local government areas that are suitable to substantial increases in residential density. It is noted that the ten initial centres identified in the Victorian Government's *Housing Statement 2024-2034* to accommodate an additional 60,000 new homes (under 'Increase housing choice in activity centres'), appear problematic due to issues such as car dependency (Chadstone), and/or being located in outer suburban areas where infrastructure and accessibility is limited by comparison to inner and middle-ring activity centres. It is suggested that a new review is needed, in collaboration with relevant Councils, based on clear and transparent criteria. The resulting centres should then be a focus for major investment, public realm and infrastructure improvements.

- Significant new State level infrastructure should be leveraged for its potential to enable higher density and social housing. Consider introducing new planning controls near relevant level crossing removals, near train stations and along the Suburban Rail Loop to mandate high density housing, including a social housing component. Consistent with the Housing Statement, this should target well located areas in relation to employment, infrastructure and services, such as key locations in inner and middle ring suburbs.

In Yarra Ranges, additional residential density is encouraged in the Lilydale, Chirnside Park, and Mooroolbark activity centres, as described in the Yarra Ranges Housing Strategy, 2024.

Big Idea 2 – More housing options for all Victorians including social and affordable homes

Prompt questions: How do you think a plan for Victoria could help to increase the amount of social and affordable homes?

In order to provide more social housing and affordable homes the following is suggested:

- A review of the legislative changes made to the *Planning and Environment Act 1987* to require local governments to negotiate with developers over social and affordable housing. The legislative changes did not provide meaningful direction to local governments in seeking these outcomes, were not supported by specific requirements in Planning Schemes, and have not led to improved outcomes in Yarra Ranges.
- Explore reforms that can provide more certainty about expectations to all parties, including the introduction of inclusionary zoning.
- Review the Windfall Gains Tax, as this potentially conflicts with affordable housing objectives. For instance, explore the potential to waive the WGT for developments which provide a specified quantum of social and affordable housing.
- Explore a range of tax incentives to encourage social and affordable housing, and advocate for Federal level tax reform if required.
- Undertake a review of all State Government owned land in and near principal, major and neighbourhood activity centres, in collaboration with relevant local governments, to identify potential sites for social and affordable housing, based on clear and transparent criteria. Make suitable land available for development, in collaboration with relevant Councils, subject to an identified process and conditions. The use of inclusionary zoning for these sites should be explored.
- As mentioned in the feedback under 'Big Idea 1', significant new infrastructure such as level crossings and the Suburban Rail Loop, should be leveraged for high density and social housing opportunities, which the State Government can do through the introduction of new planning controls, targeting key locations in inner and middle ring suburbs.

- Housing affordability is closely linked to housing diversity, particularly in outer suburban areas where housing stock is dominated by detached, family homes. A State level policy on housing diversity, with differing requirements specific to inner, middle-ring, and outer-suburban areas, could assist in improving affordability outcomes.
- One of the key challenges for Yarra Ranges and across Victoria is the impact of short-term rentals on the supply of housing. Anecdotal information has indicated that short term rental accommodation (STRA) like AirBnB, has contributed to a boom in tourism, resulting in increased local spending, particularly in areas like Healesville and Warburton, which can create employment options. However, STRAs can also bring the potential to compromise the viability of visitor accommodation businesses such as hotels and motels in these areas, due to their comparative lack of regulation and compliance obligations.
- Likewise, there are indications that the prevalence of STRAs, particularly in high tourism areas like Healesville and Warburton, where STRAs are abundant, are also having an impact on the supply of affordable rental housing, as well as detrimental effects on community cohesiveness and resilience. Unlike properties leased under residential tenancy regulations, STRAs are not subject to the same stringent compliance measures. They often generate a higher income for property owners, making this a more appealing model than providing long term rentals. While STRAs support tourism, they are reducing the availability of affordable housing for local workers and residents. The impact of STRA on the housing and economy of is complex and requires further investigation and should be addresses as part of Plan for Victoria.

Big Idea 3 – More jobs and opportunities closer to where you live

Prompt questions: How can we protect land for employment so that we can improve access to jobs and services?

Big Idea 3 is closely related to Big Idea 1, regarding the need to intensify residential and commercial development opportunities in strategically identified activity centres. Please refer to comments under Big Idea 1.

The Housing Statement encourages more residential density located in and around large activity centres, which will bring more residential land uses into proximity, and potential conflict with commercial land uses. Residential land uses may experience noise, parking and other impacts from businesses like gyms and food and drink premises. It is recommended to review the direction and guidance on addressing these impacts in the planning system, in collaboration with the EPA. Given the increased likelihood of these conflicts occurring due to the future increase residential densities in and around employment areas, the State Government should consider new planning policies and requirements for acoustic treatments to safeguard the amenity of residential development in identified areas.

It is recommended to review the Mixed Use Zone, which allows for land uses such as Industry and Warehouse, which have potential for amenity impacts on residential land uses.

Big Idea 4 – More options for how we move around from place to place

Prompt questions: In what ways can we enhance public transport options and make walking and cycling more attractive, and how can we change behaviours around car dependency?

Commuter transport patterns and urban planning in outer suburban areas of Melbourne are commonly misunderstood at State Government level, where inner-urban planning approaches to reducing car dependence are frequently understood as being equally appropriate for outer-suburban areas. Outer-suburban areas will always be car dependent, particularly urban areas like in Yarra Ranges, where topography and distance to services combine to make walking and cycling inherently unattractive in some areas, including Major Activity Centres such as Lilydale. Some suggested strategies to make car use more sustainable are:

- Taxation incentives to encourage uptake of electric vehicles within the community, supported by adequate charging facilities and infrastructure to support use of EVs. This includes use of electric cars, E-bikes, E-scooters, and other electric vehicle options.
- Multi-level car parking structures within strategically identified activity centres, where high residential densities are encouraged.

Yarra Ranges Integrated Transport Strategy 2020-2040 has numerous directions to make walking and cycling more attractive. Assistance from the State Government in realising these objectives is required. Key directions from the strategy include:

- Expanding the footpath network in priority areas, with a focus on connections to train stations and modal interchanges.
- Advocate to State Government for:
 - Infrastructure improvements including the duplication of the rail line between Lilydale and Mooroolbark stations, improved rail frequency and service reliability, a new train station to serve the Lilydale Quarry (Kinley) redevelopment, and options to manage through traffic on Main Street.
 - A wholesale review of the bus network to ensure that bus routes and timetable match contemporary needs, which would include greater evening and weekend frequencies and expansion of tele-bus services.
 - Changes to improve service on train lines in Yarra Ranges, including changes to Burnley Junction, and quadruplication of the line between Burnley Junction and Camberwell.

- Key constraints identified in the Network Development Plan to be addressed, including constraints at Ringwood Junction and single-track sections on the Belgrave line.
- The introduction of pulse timetables, enabling better coordination of bus timetables with train timetables, so that buses arrive at train station interchanges with sufficient time for passengers to get their train and then the bus waits at the station until disembarking train passengers can get to their bus.
- The introduction of bike racks on buses, to enable better integration of cycling and public transport
- Investigate opportunities to install smart infrastructure to provide real time information for commuters on where available parking bays are.

The Lilydale Major Activity Centre Structure Plan, 2022, has an Action to:

- Advocate to the Minister for Transport and the Department of Transport for the delivery of the Lilydale Bypass.

Council is now undertaking work to establish urban design principles to guide the preferred form of a future Lilydale bypass, which will be used as the basis for advocacy to the State Government in coming months.

Big Idea 5 – More certainty and guidance on how places will change over time

Prompt questions: How do you think we can give communities more certainty for how places will change over time?

The Housing Targets recently released by the Victorian Government, without prior consultation with local governments or communities, have introduced significant uncertainty over how dwelling increases can be achieved in a way that is complementary to preferred neighbourhood character and neighbourhood amenity. Clarity and leadership on these issues is needed from State Government level, as well as adequate consultation and feedback opportunities.

In addition, the Victoria Planning Provision controls intended for application to activity centres can be lengthy and confusing, particularly for laypeople, which can decrease the clarity and usability of planning schemes. An example of this is the Activity Centre Zone, which is the Victorian Government's preferred zone to apply to large activity centres where structure plans have been undertaken (PPN56). In many instances, ACZ zone schedules can be over 30 pages long, across up to 10 precincts, combining information on land use, permit triggers, and design and development requirements. ACZ schedules require users to read across multiple sections of a schedule, in order to correctly interpret planning guidelines and requirements. While the overall intention and application of the ACZ is understood and supported, it is recommended that the preferred structure, form, and application of the ACZ, and other relevant activity centre controls, is reviewed.

Big Idea 6 – More trees and urban greening in our parks and community spaces

Prompt questions: What are your thoughts on setting targets to increase tree canopy in our public spaces? What do we need to take into account?

In order to address the urban heat island effect, it is suggested private land needs to be considered in addition to public land. Trees on private land in people's front and backyards, which form part of the neighbourhood character of suburban areas, comprise over three quarters (77%) of Yarra Ranges tree canopy cover within our built-up areas.

Regarding parkland areas, some issues that need to be considered are:

- Balancing the competing priorities of achieving useable open space and recreation needs of increasingly dense activity centres, with the need for additional trees and landscaping.
- Fire risk, in some middle-ring and outer-suburban areas.
- Crime Prevention Through Environmental Design Principles.
- Species selection for resilience to climate change effects.
- The potential to provide planting as part of stormwater management projects by Melbourne Water, such as to transform underutilised open space into wetland areas.

Yarra Ranges Council recently adopted a Tree Canopy Strategy, 2024, which has an action 5.1 to 'Integrate tree canopy cover targets for all activity centres. State Government guidance on a preferred methodology to identify canopy targets for particular areas would assist.

Streetscapes present a good opportunity to increase canopy and greening, in areas with a shortage of street tree planting. The concept of 'urban greening' should not be limited to canopy trees alone, but can include low and medium height planting, such as on nature strips. Many local Councils have guidelines and local laws relating to the planting of nature strips, which the State Government should have regard to, and these are intended to ensure planting is safe and fits within the character of relevant areas. In setting canopy and urban greening targets, these planting opportunities should be incorporated.

Big Idea 7 – More protections from flooding, bushfire and climate hazards

Prompt questions: How can we balance development needs with the protection of areas prone to flooding and bushfire hazards?

Yarra Ranges is an LGA with extensive areas of urban land subject to bushfire, flood, and landslip risk, which must be taken into account in consideration of housing targets.

Yarra Ranges Council recently adopted a Housing Strategy and Neighbourhood Character Study, which were prepared in accordance with Planning Practice Note 90 (Planning for

Housing) and other relevant State Government directions. Since the adoption of the Housing Strategy, Council has been informed by the CFA and DTP officers that a strategic landscape and local level bushfire hazard assessments must be prepared as a basis for a planning scheme amendment to implement the Housing Strategy, that considers the relative risks of the areas where growth is proposed or encouraged.

In order to plan for housing and residential growth in a manner consistent with the expectations of the State Government, Councils need:

- Clear written direction, in the form of a Ministerial Direction or Practice Note, which sets out the expectations for the preparation of a housing strategy;
- An avenue for funding assistance in carrying out the required studies. In an LGA the size of Yarra Ranges, with its range of dispersed townships and urban areas, to carry out bushfire assessments at both a strategic landscape and local level, is a significant cost burden;
- Reduced expectations for the amount of housing growth and change Yarra Ranges can accommodate, due to the widespread environmental risks the municipality has, including bushfire, flood and landslip risk.

In order to plan effectively for flooding, activity centres identified for residential growth and change should be identified for drainage infrastructure capacity improvements, with State funding assistance made available.

Big Idea 8 – Greater protection of our agricultural land

Prompt questions: How can township boundaries protect agricultural land? What considerations should be taken into account?

The Urban Growth Boundary (UGB) currently prevents the expansion of many of Yarra Ranges townships including, Healesville, Yarra Glen, Warburton, Milgrove, Wesburn, Yarra Junction, Launching Place, Woori Yallock, Seville East, Seville, Wandin North, Monbulk and Belgrave/Upwey/Tecoma.

Additional urban housing development outside of the established UGB would lead to unsustainable outcomes such as high infrastructure costs and adverse impacts on the environment and landscape, and the viability of agricultural production through speculative practices such as land banking. Changes to the UGB can undermine confidence and investment decision making for agricultural producers.

There is an increasing pressure on agricultural land being purchased for lifestyle properties, as well as green wedge land on the fringes of townships being purchased with intention to hold for conversion to future residential land uses. Conversion of green wedge land to lifestyle properties can have large implications for agricultural land, leading to lower standards of land maintenance, weed infestation, biosecurity issues, and the degradation of quality agricultural land.

There is a need for further guidance in planning schemes on ancillary uses in green wedge areas. There is increasing pressure in Yarra Ranges' green wedge areas for tourist related development in association with wineries, such as accommodation, function centres, exhibition centres, restaurants, and venues for concerts and events. While these land uses have potential to support tourism and economic development, they can also conflict with nearby agricultural land and activities for a range of reasons, from amenity to use of local roads. Planning policy needs stronger recognition of the role of tourism in supporting agriculture, while also setting limitations on the scale of tourism in these areas so that it does not supersede agriculture as the dominant land use, and thereby create issues for agricultural viability.

Yarra Ranges has a long-standing problem with the dumping of soil on agricultural land, which can occur as a byproduct of urban subdivision and development in metropolitan areas, or as a result of large State Government infrastructure projects. This can significantly reduce the fertility and viability of agricultural areas. Council has written to the State Government previously on this issue, seeking planning scheme changes to introduce clear planning policy, permit triggers and decision guidelines. However, this has not resulted in any action to address the issue by DTP as part of its 'Planning for Melbourne's Green Wedges and Agricultural Land', or its recently announced 'Green Wedges and Agricultural Land Action Plan, 2024'.

In addition, there is a need to support agriculture through the planning system by providing planning permit exemptions for rural worker's accommodation in the Green Wedge zones to allow greater flexibility on this issue. Council has also formally advocated to State Government on this issue.

As experienced in Yarra Ranges and other green wedge council areas, the agricultural sector is rapidly changing and innovating its business models and farming approaches. At times, the restrictions of green wedge policies and zones can inhibit this innovation from occurring. The State Government should consider easing the restrictions on agricultural producers in green wedge areas to encourage more innovation.

Housing Targets

In relation to the Housing Targets recently released by the Victorian Government for all local government areas, Council notes that Yarra Ranges is identified to accommodate 28,000 dwellings over the period from 2023-2051 (28 years), equating to 1000 dwellings per year. The below table sets out Council's initial concerns with the targets.

Issue	Comments
Time period for local government housing strategies	<p>In accordance with Clause 11.02-1S (Supply of Urban Land) of the Yarra Ranges Planning Scheme, Yarra Ranges' Housing Strategy is based on a 15-year timeframe. This is the period Council has used as the basis for ensuring the proposed housing framework allows sufficiently for residential growth and change.</p> <p>The 28-year timeframe of the Housing Targets is roughly double the period of a municipal housing strategy, meaning that Councils will only have analysed housing capacity in relation to their respective housing and planning frameworks over the first half of the 28-year period.</p> <p>It is unclear how this discrepancy is intended to be addressed at State level. To extend the period referred to in Clause 11.02-1S to 28 years is considered too lengthy for Councils to plan for housing needs with accuracy.</p> <p>The Planning Institute of Australia, in its written response to the Housing Targets, suggested a 20-year period, which would be acceptable.</p>
Implications of not demonstrating capacity	<p>The manner with which the housing targets were introduced through the mainstream media was hostile to local government and included statements that councils could be stripped of their planning powers if targets were not met.</p> <p>In this context, clarity is sought from the State Government over what the implications of not demonstrating sufficient capacity are intended to be.</p> <p>As referred to in the table item above, it is unclear how any local government has the capability to demonstrate capacity over a 28-year period, when local government housing strategies are based on a 15-year timeframe.</p> <p>It is understood that the intention of the housing targets is for local governments to demonstrate capacity in the planning system, rather than to deliver housing itself, which is not its role. However, it should be noted that capacity in the planning system, and the quantity of planning approvals, do not always equate to housing being delivered by the private sector. There are many factors beyond the control of local governments, such as the capacity of the market to deliver housing, the cost of construction, and labour costs.</p>
Time period for the Housing Targets	The time period for the Housing Targets appears to begin in 2023, however the Targets were released in mid-2024. It is

Issue	Comments
	<p>suggested that the Targets may need to be amended to account for the time within the Housing Target period that has already elapsed.</p>
<p>Uncertainty over what types of housing will be counted towards the targets</p>	<p>Within the information available, it is unclear what types of housing will be counted towards the targets, besides single dwellings on a lot, and multi-unit developments. Specifically, there is a lack of clarity over temporary dwelling arrangements, such as transitional housing and seasonal workers accommodation. Categories where a lack of clarity exists are:</p> <ul style="list-style-type: none"> • Retirement villages • Aged care accommodation • Crisis accommodation • Transitional housing • Rooming houses • Secondary dwellings • Residential buildings • Seasonal workers accommodation • Tiny houses • Co-housing • Caravan parks, many of which may have permanent residents <p>In outer-urban and rural areas, there is an increasing pressure to allow for non-standard dwelling models, such as tiny houses, which are seen as affordable housing alternatives.</p> <p>In order to demonstrate adherence to the Targets, clarity is needed on a fundamental level over what the Targets refer to.</p> <p>As part of developing the Yarra Ranges Housing Strategy, 2024, a key issue that arose in community feedback was that there should be more flexibility in the planning and building regulatory systems to enable the retrofitting of large family homes as housing to accommodate multiple generations. It would be helpful for the State Government to explore this issue, and any legislative or regulatory changes needed to achieve this.</p>
<p>Development Contributions Schemes and infrastructure funding</p>	<p>Yarra Ranges' experience in investigating the implementation of a development contributions scheme, is that existing models are oriented to growth areas of Melbourne, and highly problematic to implement in established areas. This has been raised previously with the State Government by Councils, as well as in media coverage.</p> <p>In order to support the changes to housing promoted by the Housing Statement, with activity centres as a focal point for a renewed emphasis for high density housing, DCPs will play a critical role for local governments in providing adequate funds for the necessary improvements to infrastructure. Council continues to seek State Government reform on this issue.</p> <p>Councils across Victoria are experiencing significant pressure to provide for current infrastructure needs, without the additional infrastructure needs created by population growth. Clarity is</p>

Issue	Comments
	<p>needed on how future infrastructure gaps will be met, and what funding mechanisms and funding streams will be available.</p> <p>The Rate caps that have been in place now for some time have resulted in limitations on the ability for Council to fund and deliver key upgrades to infrastructure in order to support development. The recent announcements of Federal grant funding to support local governments in infrastructure provision are welcomed.</p>
<p>Fast, responsive, contemporary planning frameworks</p>	<p>In order to plan and adapt to the changes promoted by the Housing Statement, all councils will require adaptable and responsive planning frameworks and planning schemes.</p> <p>In Yarra Ranges this is hampered by Section 46F of the <i>Planning and Environment Act 1987</i>, which requires ongoing consistency between the Yarra Ranges Planning Scheme and the Upper Yarra Valley and Dandenong Ranges Regional Strategy Plan (RSP).</p> <p>In a recent example to illustrate this point, Amendment C148 awaited Approval by the Minister for four years. This was because C148, being a significant review and update of the Yarra Ranges Planning Scheme, contained inconsistencies with the RSP which was written in 1982. The inconsistencies required an amendment to the RSP, to bring it into alignment with C148, which required parliamentary ratification.</p> <p>This is not an uncommon scenario in Yarra Ranges. Due to the lengthy timeframe to achieve ratification, C148 awaited approval for such a long period that by the time it was approved, some of the changes made were already outdated and in need of review.</p> <p>The RSP is the responsibility of the Minister for Planning. However, there has been no indications that this continuing reliance on the RSP to guide the current planning scheme may change. Council considers that this is not a sustainable or sensible contemporary planning approach, particularly in light of recent statements by the State Government over Housing Targets and the Housing Statement. Council would welcome the opportunity to work with the Minister for Planning to investigate alternative approaches.</p> <p>In reforming planning systems, the focus of the State Government is generally on improving timeframes for the assessment and processing of planning permit applications. However, the planning scheme amendment process also needs review. Aside from the issues outlined above for Amendment C148, Yarra Ranges has experienced generally slow timeframes over a range of examples in its communications with the State Government on planning scheme amendments.</p>
<p>The importance of local neighbourhood character</p>	<p>In planning for housing, Council is guided by State Government direction, as contained in Planning Practice Note 90 (Planning for Housing), that neighbourhood character is a critical consideration in determining a housing framework.</p>

Issue	Comments
	<p>Despite this, recent announcements by the State Government appear to seek to reduce the importance of neighbourhood character in planning decision making. One example of this is the recent project to codify Rescode requirements, which seeks to reduce the exercise of discretion in decision making (which often relates to neighbourhood character concerns) in favour of a codified system.</p> <p>Added to this, the Housing Targets have led Yarra Ranges Council to question the ongoing role of neighbourhood character in planning for housing.</p> <p>In order to achieve improvements to neighbourhood character and housing design, more ground-level open space and more spacing around building elements is often needed, especially in suburban settings. This often requires reductions in building scale and development yield.</p> <p>Yarra Ranges Neighbourhood Character Study 2024 examined issues of design in detail across all residential areas of Yarra Ranges, with the objective to achieve improved outcomes through increased landscaping and ground level open space opportunities. In the context of the Housing Targets, it is unclear whether these types of reforms will be supported in the future at State level. Clarity over this is needed to allow all local governments to plan for housing with confidence.</p>
<p>DTP modelling to inform the Housing Targets</p>	<p>There are a number of concerns with the modelling methodology used to calculate the Targets, as per the information presented to Councils, as follows:</p> <ul style="list-style-type: none"> • Stage 3B refers to 'priority locations' being determined via weighted strategic scores being assigned to activity centres. However, there is no information provided on what criteria are the basis for this assessment of activity centres. • Stage 3ii refers to allocating dwelling supply figures to different areas based on the number of jobs accessible by public transport, as modelled in the VITM model(traffic modelling). It is unclear why this one aspect is identified as suitable to identify urban areas suitable for housing increases. There are a range of criteria that may be used to determine this, including the capacity of existing infrastructure, the provision of local parks and open spaces, proximity to services, the quality of local schools, and the prevalence of civic and community facilities in an area, among others. The modelling approach appears overly focussed on transport accessibility issues. • In the assessment of non-developable land to be discounted from the Targets, there are a number of concerns: <ul style="list-style-type: none"> • Areas in the BMO are assumed to have no development capacity, which is false. The purpose of the BMO is not to prevent development.

Issue	Comments
	<ul style="list-style-type: none"> • Areas in the EMO are assumed to have no development capacity, which is similarly false. We also note DTP do not have the benefit of the most recent EMO studies for Yarra Ranges. Council is willing to share this information on request. • For the 'constrained land' category, the 50% and 20% discount categories are extremely approximate. In reality, the degree of difference these overlays can make to reducing potential development yields will vary widely from site to site. There is no explanation of how these discount figures have been identified. • The Design and Development Overlay has not been factored into the calculations, despite being arguably the most important planning overlay to affect yield, due to its controls of subdivision, building heights, and building scale. • There does not appear to be any consideration of areas affected by a Development Plan Overlay. • In determining areas of flood risk, clarification is needed over whether the most recent Melbourne Water data has been used, and whether this accounts for climate change projections. <ul style="list-style-type: none"> • In determining the capacity of particular zones in specific LGAs, the top five (5) per cent largest projects are used as a basis. This does not account for areas where over-development may have been identified as an issue by local Councils, with strategic planning work to achieve improved built form outcomes, with potentially lower yields recommended than the largest possible development outcomes able to be found per area. • In calculating the capacity of activity centres, these have been mapped with approximate character types. These areas have then had 'typical typologies' applied to them. There is no information on how the approximate character types have been identified (i.e. is this based on Structure Plans, and Council strategic planning work?). It is unknown what the 'typical typologies' refers to. Consultation over these details with relevant Councils is critical to develop these concepts, based on local knowledge and extensive strategic planning work. • Land slope has not been considered in the capacity modelling, both for development sites where slope can affect the cost of development dramatically through the need for retaining walls, earthworks and excavation, but also for the distance between development sites and town centres, where slope can affect walkability and access. • Infrastructure capacity has not been considered as part of the capacity modelling, which is a critical consideration. This

Issue	Comments
	<p>should include a detailed analysis of existing infrastructure, across all infrastructure categories. However, it should also consider major planned infrastructure, particularly large state investments in health, education and other infrastructure categories.</p>
<p>Narrow focus on supply issues</p>	<p>The approach of the Housing Targets, as explained in information presented to Council officers, is to 'provide additional housing over and above projected levels, with the aim to change the balance of affordability through extra supply.'</p> <p>House prices are affected by a large range of factors aside from the housing capacity factored into local government planning frameworks, such as taxation settings, interest rates, relative access to finance, the cost of labour and construction materials, and the availability of development sites with good access to labour markets and economic opportunities. The narrow focus of the State and Federal Governments on supply alone will not assist affordability without substantial reform in other areas. One signifier of this is the high number of planning permits granted across Melbourne for residential development, that have not yet been acted on.</p>
<p>Housing diversity</p>	<p>From the information provided to Council, the Housing Targets appear largely driven by a need for greater housing affordability. A critical determining factor in affordability is housing diversity.</p> <p>Currently, State level planning policy direction on housing diversity objectives is very fundamental and limited, and refers to the need to achieve diversity, without providing policy direction on what particular diversity outcomes are supported in particular areas, such as distinguishing between inner, middle-ring and outer suburban areas. It is largely left to local government to provide this guidance, through housing strategies. Aspects of diversity that need policy direction include:</p> <ul style="list-style-type: none"> • Social and affordable housing • Key worker housing • Different typologies (number of bedrooms, building forms) • Accessible and adaptable housing (e.g. to allow for aging in place or access for people living with a disability) <p>In providing Housing Targets to improve affordability, more direction on housing diversity is should be key component, rather than the more basic reliance of the Housing Targets on overall dwelling figures per area.</p>
<p>Short timeframes for development and feedback on the Housing Targets</p>	<p>It is unclear why this work has been developed with such haste, and as described above, with some serious questions over the accuracy of the analysis underpinning the Housing Targets, and the integrity of the exercise as a whole.</p> <p>Housing affordability appears to be a central concern, which the Housing Targets are seeking to address. However, affordability has been an issue for many years leading to this point, becoming progressively worse.</p>

Issue	Comments
	<p>It is agreed that serious intervention is needed to address affordability, however this needs to take a long-term strategic lens, rather than a reactionary and politically expedient one.</p> <p>Any action needs to include local government as partners, with adequate consultation and opportunities for input, rather than the urgency this work has been developed with, and the general lack of will to work local government that has been evident throughout.</p>
Eastern Region Group of Councils	Yarra Ranges Council is part of the Eastern Region group of Councils, together with Knox, Manningham, Maroondah, and Whitehorse. A submission will be made separately on behalf of this group, covering common issues and concerns identified.

Conclusion

Council appreciates the opportunity to provide feedback on the above and would welcome the opportunity to be further involved in discussions over these matters. It is suggested that a second round of consultation should take place once the plan is more developed before the document is finalised.

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