

Submission on behalf of Monash Council

Draft Eastern Metro Land Use Framework Plan

October 2021

DRAFT

Introduction

Monash Council welcomes the opportunity to comment on the draft Eastern Metro Land Use Framework Plan (ERLUF), a 30 year strategic vision to guide and inform the future development of the Eastern Region of Melbourne.

Monash has participated in a number of workshops and meetings throughout the development of the draft ERLUF, particularly through its involvement with the Eastern Region of Councils Planning Group.

The feedback on the draft Eastern Metro Land Use Framework Plan is outlined in the following sections –

- General Comments
- Comments on the Key Themes – productivity, housing choice, integrated transport, liveability, strong communities, and sustainability and resilience.
- Conclusions
- Attachment 1 – Comments on the Actions
- Attachment 2 – Comments on the Directions

General Comments

- The draft Eastern Metro Region includes the municipality of Yarra Ranges, a large proportion of which is not metropolitan and has very different opportunities and challenges to the rest of the region. This is reflected in some of the strategies that focus on strategies for agriculture and tourism.
- Although it is a land use plan, the draft LUF includes a range of overarching, unclear and ambiguous policy statements that do not relate specifically to land use planning. These include statements such as supporting start-ups and creative industries, regional planning for social services and supporting a range of sporting activities across the region.
- The Suburban Rail Loop (SRL) is identified as a catalyst for significant increased urban density, however the SRL is not scheduled for completion until 2035/36.
- The Suburban Rail Loop is a key project for delivering improved transport connectivity across the region and for the development of the SRL precincts as location for significant growth and change.
- Four activity corridors have been identified in the Eastern Region as highly accessible locations for increased investment and development, including employment uses and higher density housing.
- Two activity corridors are located in Monash – Dandenong Road / Princes Highway from Caulfield to Chadstone extending east of Springvale Road, and North Road / Wellington Road from the Huntingdale, east to Rowville. These corridors are excessively long – over 15 kilometres – and include many areas with fragmented conventional suburban development.
- Precincts and corridors identified throughout the Plan are extremely large and unlikely to obtain the jobs or housing density required to focus growth, target infrastructure improvements or achieve the 20 minute neighbourhood principles.
- The boundary to the Monash National Employment and Innovation Cluster (MNEIC) is shown incorrectly in a number of maps throughout the LFRP as it is shown extending north of the Monash Freeway and west to include Oakleigh. In particular, Figure 7 shows in more detail a much enlarged cluster area extending east and south.

- The scale of the mapping that results from the inclusion of all of the Shire of Yarra Ranges compacts the metropolitan areas resulting in much of the information being jumbled and unclear.
- Governance around the implementation of the LUFs is unclear.
- There is heavy reliance on mapping to communicate the messages but there are no interactive maps provided.
- Map 2 doesn't allow some of the major contributing places and precincts to be shown clearly. They are listed but not mapped.

What will be the role of the LUFs?

- It is not clear what, if any, statutory status the LUF will have once finalised and whether it, or part of it, will form part of local planning schemes.
- Clear governance arrangements between Councils and the State Government is needed to ensure that planning objectives can be realised.
- The timeframes for a number of the actions is too short and will place pressure on local government and state resources in order to achieve the range of projects within these times.
- There is some contradiction and inconsistency in policy statements and action in the draft LUF, particularly on issues relating to housing and employment areas.
- There is concern over the requirement in Action 4 to update planning schemes to align with the housing policies in Plan Melbourne and the Eastern Metro LUF. The resourcing implications of requiring strategic planning work to focus on updating local housing strategies and preparing structure plans to inform future changes needs to be considered in light of the tight timeframes for this action.

Comments on the Key Themes

Productivity

- The Suburban Rail Loop is referenced heavily in this section, particularly connectivity between employment areas.
- The draft LUF doesn't reflect the importance of manufacturing jobs in the region.
- Map 2 does not show how 'productivity will be enhanced' by the strategies and initiatives shown in Appendix 1
- The Monash National Employment and Innovation Cluster (MNEIC) is not drawn accurately – showing it extending north of the freeway and west to include Oakleigh. This is evident in all of the regional maps and particularly the MNEIC Map shown as Figure 7.
- The SRL Monash station is not in the correct position – it is not proposed to be located on Blackburn Road, but is planned for Normanby Road near Howleys Road, Notting Hill, to the north of Monash University and the CSIRO.
- The job and population projections for the SRL precinct show very large increases at all 3 station precincts in the City of Monash – at Clayton, Monash, Glen Waverley.
- Figure 7 also shows the Synchrotron in wrong location, and should indicate that Kingston and Greater Dandenong are outside this region.
- The activity corridors along Princes Highway and Wellington Road (in Monash) are undefined and shown as very wide corridors along the length of these roads. Some definition about these areas is required, and further detail about the role of these areas, whether it would be preferable to identify nodes for preferred locations of intensified activity based on zoning and location, rather than broad corridors.

- Clayton Business Park is shown on Figure 7 as a site for further development. This site is in the City of Kingston and it is understood that the project to rezone and develop this site has been abandoned.
- The Huntingdale Industrial Area (part of MNEIC) has been included as a regionally significant industrial precinct, although it is identified in MICLUP as being of local significance.
- The Plan doesn't define the 'significant mixed-use activity area' around the SRL station at Monash – what are the implications for land uses, built form and access within the precinct area?
- Job and pop projections shown in Figure 9 seem very large with huge implications for Monash in the future if realised.
- Table 5 – Metro and Major Activity Centres: Existing attributes and strategic opportunities – identifies Brandon Park as having regionally-significant industrial land. It does not. It is also not located in proximity to the proposed Monash SRL station being approximately 2 km to the east.
- Action 2 – State Government-led planning projects in Major Activity Centres and urban renewal areas – concerns about the potential level of Council input into these projects, and whether timeliness will be prioritised over local outcomes.

Housing Choice

- There are 4 Housing Investigation Areas centre around railway stations in Monash – Huntingdale, Holmesglen, Jordanville and Syndal (as well as Hughesdale in Glen Eira). It is unclear why these stations have been identified when similar stations on the Lilydale/Belgrave line have not been selected.
- The plan does not adequately address housing affordability or affordable housing provision.
- There is concern over action to review controls in housing investigation areas particularly those around the SRL stations – need more certainty around the planning of these areas.
- The population and housing projections used need further explanation.
- Support the action of identifying a pipeline of sites for social and affordable housing.

Integrated Transport

- Even though there is heavy reliance on the SRL to deliver connectivity in this region it is not highlighted in these section.
- This plan should identify specific bus prioritisation opportunities such as bus lanes and upgraded signals at intersections.
- The plan does not provide sufficient antidote to traffic congestion.
- There are no specific strategies or actions that would connect the MNEIC to wider areas and increase connectivity inside the MNEIC.
- There don't appear to be specific actions and strategies that support the regional linkages (e.g. Glen Waverley <> Knox Central, Ringwood <> Clayton).
- Work needs to be done to reduce public transport travel and interchange times by increasing coverage and frequency, reducing wait times, and improving connectivity between modes.
- There are no public transport strategies listed under Direction 14, despite it being critical to promote a mode shift.
- The Westall Road extension is mentioned as a potential road project of regional significance but it should also be noted as a project that would add integrated transport benefits by

freeing up road capacity on adjacent arterial roads like Blackburn Road and Springvale Road for Bus Priority routes.

- The Plan indicates that the Strategic Cycling Corridors are “well-developed” in the western part of the region, however this is questionable. There are a number of sections that are below current standards and this needs to be addressed.
- The CBD-Scoresby SCC in Monash along the paved sections of Scotchmans Creek Trail shared path has a number of sections that are below current standard, and the section between Monash Aquatic Centre and Dandenong Creek Trail is predominantly informal and defined only by wayfinding signage. The Syndal Pipe track section of the Chirnside Park to Mordialloc SCC is a gravel path only.
- The VicRoads Principal Bicycle Network and Bicycle Priority Routes along direct routes, such as arterial and collector roads, are still considered necessary to support commuter cyclists rather than recreational routes, shared with pedestrians, which form part of the Strategic Cycling Corridor network. The increasing problem of cyclists speeding on shared paths is discouraging people walking and the concentration on the SCC network to the exclusion of more direct commuter bike facilities may be counter-productive.
- To reduce dependence on private vehicles and make public transport more accessible, access to bus stops on arterial and busy roads needs further consideration and priority. These roads are often difficult for pedestrians to cross without the support of formal pedestrian facilities nearby.
- There are no specific strategies or actions that would connect the MNEIC to wider areas and increase connectivity within the MNEIC, even though this is identified as a regional challenge.
- The proposed Caulfield to Rowville Link is shown as a concept route subject to design and planning work – its status needs to be clarified.

Liveability

- The LUF encourages the creation of additional boulevards along key road corridors throughout the region to reinforce the treed character of the region and enhance pedestrian and cycling amenity.
- In Monash this includes Dandenong Road, Springvale Road, Ferntree Gully Road and Wellington Road, although Map 6 – Liveability – does not show this correctly.
- In addition, the Monash, Eastern and Eastlink Freeways are all shown as potential green boulevards, although it is not clear how the objective of enhancing pedestrian and cycling amenity would be achieved in these locations.
- The draft LUF encourages the creation of new open space particularly to serve walkable catchments from residential areas, but provides no explanation as to how this would be achieved, who provide or how it is to be funded.
- The use of a public open space m² ration is questionable given that such an approach was not supported by the Panel and the Department of Planning as part of Monash Council’s recent Amendment C148 on proposed changes to open space contributions.
- Would also question the basis for the calculation of open space per person in Figure 18. Monash is indicated to have the second lowest amount in the Eastern Metro Region at 38.3m² with Whitehorse the lowest with 36.7m². This differs from the figures that we have in the Monash Open Space Strategy 2018.
- Landscaping should be encouraged for all development along the boulevards – particularly to the front setbacks and between buildings.

- The state government should consider undergrounding of all electrical power lines along all areas designated for boulevards (delivered at scale and funded through a DCP) and to encourage the planting of significant street trees with spreading canopy (also funded through a DCP).

Strong Communities

- Strategy 60 should also include the provision of passive open space to meet the needs of the population - not just active/ sporting open space.
- The Plan should have greater focus on provision of open space- if we are increasing our population the existing open space will need to work harder to meet the needs of the population.
- Consider including a strategy that requires the development of an integrated plan for the state significant education and health precinct within the MNEIC in Monash
- Could include a strategy about enhancing trails to improve connectivity between open space areas.

Sustainability and Resilience

- It is unclear whether, when discussing urban tree cover, the figures quoted this include green wedge areas, and in particular the non-urban areas of Yarra Ranges.
- Direction 25 should relate to 30% urban canopy cover in urban areas of the eastern region, excluding the green wedge areas.
- Regional challenges- greater detail on high canopy/ vegetation loss and its impact on urban heat island- and that they are concentrated in certain areas of the region including Glen Waverley and Clayton.
- Consider including a strategy to increase vegetation along paths. Encouraging 20 minute neighbourhoods means that paths and trails need to be well vegetated, with increased tree canopy and less impervious surfaces in urban areas to mitigate the impacts of high urban heat.
- The role of water to support urban greening, enhance cooling and design needs to be more clearly defined. Reference could be made to the role of water management, and harnessing alternate water sources such as stormwater, greywater and treated wastewater.
- Measures such as passive irrigation with stormwater runoff and porous pavements can play a significant role in supporting the canopy and new establishing trees.
- Green infrastructure should not be supported with potable water where there are opportunities for alternate water sources within buildings.
- There should be a closer alignment with Integrated Water Management Plans and targets.

Conclusion

In conclusion, the following key comments form the basis of this submission:

1. Corrections to the draft

- Boundary of MNEIC is incorrect and includes areas that were not intended to be included – no discussion of this to date and should be drawn to reflect previous work done by VPA.
- Scale and accuracy of maps
 - The inclusion of Yarra Ranges Shire distorts the region – consider 2 maps – urban and non-urban
 - Mapping needs to be clearer – some information cannot be read at this scale and this will lead to disputes of boundaries particularly at VCAT
 - Consider using interactive maps to enable greater detail / more accurate information to be shown diagrammatically.

2. Activity Corridors

- The 2 activity corridors in Monash cover very large areas and have been drawn without any focus points or nodes. They are excessively long and include many areas with fragmented suburban development.

3. Westall Road Extension

- Need certainty about this project
- It is essential to providing better connections within the region, particularly benefitting freight and traffic in the MNEIC
- The extension will free up other major arterial roads in the region for public transport routes and other active transport opportunities, contributing to the 20 minute neighbourhood objectives.

4. Suburban Rail Loop

- Need more guidance around planning for the new SRL station precincts – how will these area be defined, responsible/planning authority status, role of existing policy
- Question whether the area of the precincts at 1.6km radius has been drawn too broadly – what are the implications for this?

5. Governance issues / reports

- It is not clear what statutory status the EMLUFP will have once finalised and whether it or part of it will form part of the local planning schemes.
- There is a lack of clarity on the governance for the implementation of the LUFFP.
- A number of the actions are short term to be delivered within 2 years, placing extreme resourcing burdens on local government and other stakeholders including DELWP.
- Consideration should be given to extending the timeframes suggested, and providing funding assistance.

Attachment 1

Eastern Metro LUF – Comments on the Actions

No	Action	Time	Lead	Partners	Response
1	<p><u>Planning for Monash NEIC</u></p> <p>Establish a long-term state and local government partnership to oversee, coordinate and manage land use planning for the Monash NEIC.</p>	0-2 y	DELWP, DJPR	Councils, VPA	Will be a large, resource intensive project. DELWP and DJPR to lead but will require substantial buy in and resourcing from local government.
2	<p><u>Renewal of Metropolitan and Major Activity Centres</u></p> <p>Implement a program of State Government-led planning projects, in partnership with local government, to ensure metropolitan and major activity centres and urban renewal areas maximise their respective strategic opportunities. Priority will be given to those which deliver significant jobs and housing; leverage investment in state infrastructure; and play an important role in the growth corridor and/or region. State-led planning for these state- and regionally-significant places will contribute to creating liveable communities and achieving more dwellings and jobs in established areas and identify implementation and coordination actions that support growth and economic investment.</p>	0-2 y	VPA	Councils, DELWP	<p>While it's great resourcing will be provided, will this risk taking control away from Councils, and have too high a priority on implementing state policy without local influence?</p> <p>While these are state significant locations, a centralised approach to planning risks a monotonous repetitive outcome that doesn't provide any points of difference to any of the locations. Too often State delivered location based planning prioritises timeliness over outcomes.</p>
3	<p><u>SRL Station precinct planning</u></p> <p>Undertake Precinct Planning for Suburban Rail Loop Precincts with local councils and other stakeholders to</p>	2-5 y	SRLA	Councils, DELWP, DJPR	Local government and other stakeholders will be integral to achieving this action. Given the importance of this project and the level of investment, there is the

No	Action	Time	Lead	Partners	Response
	guide land use change, transport integration and the creation of liveable, walkable and prosperous precincts.				risk of repetitive, non-unique outcomes for each station.
4	<p><u>Planning for housing</u></p> <p>Update planning schemes to align with housing policies in Plan Melbourne and the Eastern Metro Region Land Use Framework Plan and the implementation of the reformed residential zones. This includes:</p> <ul style="list-style-type: none"> • Providing capacity for 15 years of regional housing supply focusing on locations identified for housing growth in the LUFF • Reviewing planning controls in housing investigation areas as potential locations for substantial or incremental housing change <p>This may require strategic planning work to support these changes such as preparing or updating local housing strategies or preparing structure plans to further investigate where increased densities can be supported, and determine specific changes required to planning schemes.</p>	0-2y	Councils	DELWP	<p>This is an extremely short timeframe to undertake the work required over a 2 year period.</p> <p>Will there be funding available to assist Councils in resourcing this work, as this will place an unreasonable burden on funding and staffing this work.</p> <p>Will there even be capacity in planning to do this given staffing challenges and the number of planners DELWP have taken out of the system to deal with other major infrastructure projects. Achievability in desired timeframe is questionable.</p> <p>Although this action refers to the review of planning controls, what ability will there be for Councils to vary mandatory building heights, for example?</p> <p>Will there also be a corresponding review of VPP's?</p>
5	<p><u>State Government surplus land</u></p> <p>Identify underutilised and surplus government land that has potential to deliver additional social housing</p>	0-2y	DFFH (HV)	DELWP	State Government project and role.
6	<p><u>Identify sites for affordable housing</u></p> <p>In partnership with councils, identify a pipeline of sites in the Eastern Metro Region for social and affordable housing.</p>	2-5 y	DFFH (HV)	Councils	Agree in principle and should begin with the identification of state government land for suitable sites.

No	Action	Time	Lead	Partners	Response
7	<p><u>Review bus network</u></p> <p>Undertake a review of the regional bus network including improvements to the SmartBus routes, Doncaster and Regional Transport (DART) and improved access to Deakin University to support regional access and movement in the short to medium terms and to plan integration with major public transport changes such as the SRL.</p>	0-2 y	DoT	Councils	The Eastern Transport Coalition of which Monash is a member, should be included as a partner in this action.
8	<p><u>Plan for Dandenong Valley Parklands</u></p> <p>Prepare a vision for the Dandenong Valley Parklands, including defining the optimal extent of the parklands, and a framework to ensure key access points and integrated water management objectives are acknowledged in local planning decisions.</p>	0-2 y	Parks Victoria	Councils, DELWP	Support this action.
9	<p><u>Review Health Infrastructure</u></p> <p>Assess the health services infrastructure in the region's rural locations and prepare a regional response to improving access to services.</p>	0-2 y	DH	Councils	Broader regional action.
10	<p><u>Plan for Health and Education Precincts</u></p> <p>Review local planning policy and provisions for identified regionally-significant health and/or education precincts to support their continued effective operation and their future growth and expansion, including in the case of health precincts, for associated allied health services.</p>	2-5 y	Councils	DELWP, DET, DH	In Monash's case this would largely fall within the more general planning for the MNEIC and Action 1 of this plan.

No	Action	Time	Lead	Partners	Response
11	<p><u>Plan for 20 minute neighbourhoods</u></p> <p>Develop guidance on a new approach to neighbourhood planning in partnership with local councils of the Eastern Metro Region which embeds the hallmarks of 20-minute neighbourhoods</p>	0-2 y	DELWP	Councils, DoT	This action appears to be mainly about developing a process/system as a new way of approaching neighbourhood planning.
12	<p><u>Plan for bushfire risk</u></p> <p>Prepare a regional bushfire response for suburban and peri-urban communities that are subject to bushfire risk.</p>	2-5 y	DELWP	Councils, CFA	Unlikely to have any significant planning ramifications for Monash. Main hazard is along Dandenong Valley. This area is all built up area, and given current planning controls it is unlikely there'll be any significant increase in development intensity.
13	<p><u>Update flood controls</u></p> <p>Update planning provisions for flooding (i.e. Special Building Overlay, Land Subject to Inundation Overlay and Urban Flood Zone) to represent current and forecast flooding data.</p>	0-2 y	DELWP	Councils, Melbourne Water	This lists DELWP as the lead. Is it only an update to provisions, or is it an update to mapping as well? Perhaps DELWP is going to update flood controls like they do for bushfire?

Attachment 2

Eastern Metro LUF – Comments on the Directions

Productivity		
		<i>Comment</i>
Direction 1	Facilitate the development of the Monash NEIC as a globally recognised health, education, technology and advanced manufacturing centre supported by increased transport connectivity	Need State Government focus and financial commitment to achieve this direction.
Direction 2	Ensure the regions' strong health and/or education precincts continue to provide local jobs while supporting the region's growing population	Yes
Direction 3	Support the development of a strong network of activity centres to provide jobs closer to where people live	Agree
Direction 4	Intensify and diversify the range of employment uses within regionally-significant industrial precincts	Agree
Direction 5	Develop activity corridors to support increased employment and housing opportunities	Need to temper expectation around the level of housing development in these new activity corridors – particularly in the MNEIC. Raises the issue of different / new categories of accommodation related to the industrial / commercial aspirations of these areas.
Direction 6	Ensure protection of green wedges and support their role to provide agriculture, tourism and state infrastructure for the long term benefit of all Victorians	Should probably be in a separate region. Not really relevant to land use planning for the metro councils. Brings into question why this region includes the rural areas of Yarra Ranges?
Housing Choice		
		<i>Comment</i>
Direction 7	Increase the supply of housing in the eastern Metro Region	Directions and actions should not be read as targets to meet.
Direction 8	Prioritise housing growth in areas with access to jobs, services and good public transport	Must have regard to local housing strategies and policies.

Direction 9	Provide greater choice and diversity of housing in the Eastern Metro Region	Support this broad principle
Direction 10	Increase the supply of social and affordable housing	Support. This is a key platform of the Eastern Affordable Housing Alliance.
Integrated Transport		
		<i>Comment</i>
Direction 11	Improve transport connections to support the productivity of the Eastern Metro Region	The Westall Road extension is not only a project of regional significance, it will add integrated transport benefits by freeing up road capacity on adjacent north-south arterial roads allowing the introduction of bus priority routes.
Direction 12	Improve public and active transport access to Monash NEIC, metropolitan and major activity centres and Suburban Rail Loop precincts	Agree that it is important that the location and design of the SRL precincts will link in closely with other public transport and active transport routes and activity centres.
Direction 13	Improve regional cycling networks to increase the attractiveness of cycling in the region	The VicRoads Principal Bicycle Network and Bicycle Priority Routes along direct routes such as arterial and collector roads are necessary to support commuter cyclists rather than recreational routes that are often shared with pedestrians and form part of the Strategic Cycling Corridor network.
Direction 14	Improve active and public transport options to promote mode shift and support 20-minute neighbourhoods	Reducing the dependence on private vehicles by making public transport more accessible will assist in achieving this direction.
Direction 15	Allow more flexible use of the existing road network	It is unclear what this means in a practical sense.
Liveability		
		<i>Comment</i>
Direction 16	Protect and enhance the region's landscapes, waterways and biodiversity	Agree
Direction 17	Create a legacy of great civic places	Agree
Direction 18	Transform key road corridors into green boulevards	Agree but unsure how this will be achieved along the freeways nominated.
Direction 19	Strengthen the network of open spaces and trail connections across the Eastern Metro Region	Agree – the Monash Open Space Strategy supports this direction.

Strong Communities		
		<i>Comment</i>
Direction 20	Plan for major social infrastructure at a regional level	While the provision of most social infrastructure is undertaken at the local level, there are opportunities for regional collaboration on major projects.
Direction 21	Deliver health and education services in strategic locations	This is the responsibility of State Government.
Direction 22	Support a network of activity centres to anchor 20-minute neighbourhoods across the Eastern Metro Region	In established areas this network already exists.
Sustainability and Resilience		
		<i>Comment</i>
Direction 23	Minimise and reduce bushfire risk to buildings and communities	Agree
Direction 24	Increase the network of cool places, particularly in areas with communities vulnerable to urban heat and areas with high urban heat	The role of water to support urban greening, enhance cooling and design needs to be more clearly defined. Reference could be made to the role of water management, and harnessing alternative water sources such as stormwater, greywater and treated wastewater to support this direction.
Direction 25	Increase urban tree canopy across the Eastern Metro Region to achieve 30 per cent coverage by 2050	This direction should apply to the urban or metro parts of the region, excluding the green wedge areas. Measures such as passive irrigation with stormwater runoff and porous pavements can play a significant role in supporting the canopy and new establishing trees.
Direction 26	Integrate green infrastructure with land use and infrastructure change to maintain cool urban environments	Green infrastructure should not be supported with potable water where there are opportunities for alternate water sources within buildings.
Direction 27	Protect the role of the Eastern Metro Region as the major water catchment for Melbourne	Agree
Direction 28	Increase the retention and reuse of water in the urban and rural environments to contribute water security and enhance waterways	Should have closer alignment with Integrated Water Management Plans and Targets.