

## 7.1.4 AMENDMENT C174 - AFFORDABLE HOUSING - CONSIDERATION OF SUBMISSIONS

<b>Responsible Manager:</b>	Sean McNamee, Manager Strategic Planning
<b>Responsible Director:</b>	Peter Panagakos, Director City Development

### RECOMMENDATION

#### That Council

1. **Notes and considers all submissions received in response to the proposed Amendment C174 – Monash Affordable Housing Strategy implementation.**
2. **Notes and endorses the officer comments and responses to the matters raised in submissions as set out in this report as the basis for Council’s submission to the panel.**
3. **Pursuant to Section 23(1) and Part 8 of the Planning and Environment Act 1987 request the Minister for Planning appoint an independent planning panel under Part 8 of the Planning and Environment Act 1987 to consider submissions to proposed Amendment C174.**
4. **Refers all submissions on proposed Amendment C174 to the planning panel appointed by the Minister for Planning.**
5. **Notifies all submitters to the Amendment of Council’s resolutions on proposed Amendment C174 as set out above.**

### INTRODUCTION

The purpose of this report is to:

- Consider submissions received during the public exhibition of proposed Amendment C174,
- Consider officer comments and recommendations in response to the submissions received.

As there are submissions which conflict with each other or request changes to the Amendment that are not supported, it is recommended that Council request the Minister for Planning appoint an independent planning panel to review the amendment and consider all submissions received.

### COUNCIL PLAN STRATEGIC OBJECTIVES

#### **Sustainable City**

Ensure an economically, socially, and environmentally sustainable municipality.

#### **Inclusive Services**

Advocate and partner to deliver social and affordable housing in Monash.  
Fostering an equitable, just, and inclusive Monash.

## BACKGROUND

### Monash Affordable Housing Strategy

Council adopted the Monash Affordable Housing Strategy on 26 September 2023.

The Monash Affordable Housing Strategy makes a clear case for taking action on the reform of policy settings that impact housing affordability, and to increase the provision of affordable housing in the City of Monash. It demonstrates both the need and economic and community benefits of increasing housing affordability and having more affordable housing.

The objective of the Monash Affordable Housing Strategy is to:

*Identify a clear and practical set of strategies and actions for Monash City Council to support increased housing affordability and supply of affordable housing, within its remit as a local government authority.*

### Amendment C174 – Implementation of the Monash Affordable Housing Strategy

On 27 February 2024, Council resolved to:

1. Request the Minister for Planning to authorise Council, pursuant to Section 8A of the Planning and Environment Act 1987, to prepare an amendment that implements the adopted Monash Affordable Housing Strategy. The amendment proposes to change the planning scheme including policy statements:
  - a. about the need for affordable housing in Monash,
  - b. in support for affordable housing contributions; and
  - c. requiring the provision of a 6 per cent affordable housing contribution for development of 20 or more dwellings or when land is rezoned.
2. Upon receiving authorisation from the Minister for Planning, prepare and exhibit the amendment in accordance with Section 10 of the Act and any other directions required by the Minister.
3. Authorise the Director City Development to prepare and finalise the documentation for the planning scheme amendment in accordance with this report.

Authorisation was requested on 5 March 2024. On 14 March 2024, the Department of Transport and Planning (DTP) requested further information which was provided on 27 March 2024.

On 14 November 2024 Council received authorisation with seven conditions. All conditions related to drafting, requiring:

- Some change of language to allow greater flexibility.
- Minor drafting changes to improve clarity.
- Drafting the amendment in the new format following the gazettal of Amendment C166.

Officers complied with these conditions and commenced exhibition of proposed Amendment C174 on Tuesday 28 January 2025.

Exhibition did not occur earlier to avoid consultation over the Christmas and school holidays period.

## DISCUSSION

The amendment was exhibited from 28 January 2025 to 7 March 2025.

A total of 14 submissions were received to the amendment.

A summary of these submissions, the issues raised, and the officer recommendation in response to the submissions is provided at **Attachment 1**.

Copies of the submissions are provided at **Attachment 2**.

Of the submissions received:

- 2 supported the Amendment as exhibited.
- 7 sought changes to the Amendment as follows:
  - 3 sought a greater contribution than proposed 6% .
  - 2 raised concerns about the need for infrastructure and other issues associated with population growth.
  - 1 sought greater flexibility in the dwelling tenure and perpetuity provisions.
  - 1 raised concern with the calculations used and other considerations relating to operation of the provisions.
- 4 submissions opposed the Amendment outright.
- 1 was neutral with no changes sought or sought outcomes currently included in the Amendment.

No changes are therefore recommended to the amendment to satisfy submissions. Any changes would result in a substantial deviation from Council's adopted position and would conflict with other submissions.

### Key issues raised in submissions

The key issues raised in the submissions, along with an officer response and recommendation are set out below.

A more detailed response to each submission is provided in **Attachment 1**.

### Issue 1 - Do not support provision of affordable housing.

Some submitters did not support Council's involvement in supporting the provision of affordable housing stating that it is not the role of Council.

#### Officer response

The Planning and Environment Act 1987 sets out a range of objectives for in Victoria, including, to *facilitate the provision of affordable housing in Victoria. (Objective (fa) Planning and Environment Act 1987.)*

As Council is responsible for the Monash Planning Scheme and planning and development approvals across Monash, it has a clear role in facilitating the provision of affordable housing and giving effect to the objectives of the Planning and Environment Act 1987.

*Officer recommendation – no change to the Amendment.*

**Issue 2 - The proposed requirement is not sufficient and will not deliver sufficient affordable housing for Monash.**

Some submitters did not think that a 6% contribution was adequate and should be increased.

Officer response

The contribution rate proposed in Amendment C174 has been set based on benchmarking of other rates, and analysis of an appropriate rate whilst balancing the imposition on development.

Affordable housing contributions raised through development proposals as sought by Amendment C174 are intended as one means only to support the provision of affordable housing. There are a range of other actions including by State and Federal governments that will also contribute to addressing the issue of affordable housing.

For example, the Victorian State Government is increasing the provision of affordable housing through the Big Housing Build and via an affordable housing requirement for developments accessing their Development Facilitation program

The Federal Government are investing in the Housing Australia Future Fund and the National Housing Affordability Fund.

*Officer recommendation – no change to the Amendment.*

**Issue 3 - Higher density housing should only be supported when accompanied by upgraded infrastructure.**

Officer response

The submission is concerned about the overall increase in development across Monash. Whilst infrastructure needs and dwelling growth are a relevant consideration when changing development densities, the Amendment does not propose changes to the development density possible on land in Monash.

The proposed changes will not increase the number of dwellings allowed, or change the way they are developed, only change the ownership of some dwellings.

The amendment will not impact infrastructure needs relating to population growth.

*Officer recommendation – no change.*

**Issue 4 - Affordable housing contributions through the planning system must be voluntary.**

Officer response

The amendment does not propose mandatory contributions.

The amendment seeks contributions through local policy, which are discretionary.

Policy Guidelines provide a threshold and contribution rate which set out Council's expectations.

*Officer recommendation – no change.*

## **Issue 5 - Contributions will make some development unviable, reducing development, and reducing overall dwellings**

### Officer response

There are a range of factors influencing development viability.

The inclusion of the affordable housing contribution policy the planning scheme will allow developers to consider and factor in this requirement when purchasing development sites.

*Officer recommendation – no change.*

## **Issue 6 - Contributions should be more flexible, including provision for fixed terms.**

### Officer response

The need for affordable housing is ongoing.

The provision of affordable housing for a limited time of 10/15 years period may provide a temporary relief but will result in the affordable housing being removed from the housing pool, recreating the problem that was sought to be addressed initially. Whilst the development that was approved at the time remains, but with a changed dwelling tenure.

The direct provision of dwellings as part of an affordable housing contribution is one of the options of the policy, others include discount on sale prices to registered housing providers.

The transfer of dwellings in perpetuity is a standard policy approach in affordable housing response.

*Officer recommendation – no change.*

## **FINANCIAL IMPLICATIONS**

The amendment process and any subsequent panel hearing can be accommodated within existing operating budget allocations.

## **POLICY IMPLICATIONS**

Amendment C174 is consistent with Council's objectives of encouraging more affordable housing in Monash, as set out in the Council Plan and the Monash Health and Wellbeing Plan 2021-2025.

## **CONSULTATION**

Consultation was undertaken in accordance with the notice requirements of the Planning and Environment Act, 1987. Prior to this, consultation was also undertaken in the preparation of the Monash Affordable Housing Strategy.

The Amendment was exhibited for five weeks. Notice was undertaken by:

- Writing to development industry peak bodies, regular applicants, and adjoining Councils.
- Writing to affordable housing providers.

- Notification to relevant consultation subscribers on Shape Monash – 1829 emails.
- Writing to prescribed Ministers.
- Notice in the Public Notices section of The Age.
- Notice in the Victorian Government Gazette.
- Information in the Monash Bulletin.

A total of 14 submissions were received during the exhibition period.

The submissions and the recommended response by officers to each are included in **Attachment 1** and **Attachment 2** to this report.

Consultation on the Amendment has now concluded.

## **SOCIAL IMPLICATIONS**

There are no social implications related to the procedural elements of this report.

There are broader positive social implications through encouraging the provision of affordable housing, and these were considered and embedded in the Monash Affordable Housing Strategy.

## **HUMAN RIGHTS CONSIDERATIONS**

The human rights implications were considered in preparing the Monash Affordable Housing Strategy.

As Council is now considering the next steps of a statutory process, and there are no additional human rights implications.

## **GENDER IMPACT ASSESSMENT**

A GIA was not completed because this agenda item is not a 'policy', 'program' or 'service'.

A GIA was completed and considered in developing the Monash Affordable Housing Strategy, and recommendations of that were embedded into the strategy.

## **CONCLUSION**

Amendment C174 seeks to implement key planning actions of Councils adopted Monash Affordable Housing Strategy. In particular, the Amendment proposes to introduce policy for the provision affordable housing in developments of over 20 dwellings and where land is proposed rezoned to accommodate residential development in Monash.

Amendment C174 was exhibited from 28 January 2025 to 7 March 2025. 14 submissions were received during that time. Three support the amendment as exhibited or are neutral, seven seek changes to amendment, and four oppose the amendment.

No changes are recommended to the Amendment in response to issues raised in the submissions.

Given there are submissions that are unable to be resolved, it is recommended that Council request the Minister for Planning to appoint an independent planning panel to consider the Amendment and all submissions.



## ATTACHMENT LIST

1. C174 Submissions Summary [**7.1.4.1** - 4 pages]
2. C174 Full submissions [**7.1.4.2** - 31 pages]

## Summary of submissions

Submission no. and details	Key issues raised	Support	Officer comments and recommendations
SUB001 Glen Waverley Resident	Does not support provision of affordable housing through developer contributions. Increases costs, reduces turnover of other (existing) properties and puts costs onto other purchasers.  Whole community has to deal with social issues from ill thought out strategy, should be making Monash more upmarket, not dragging down.	Object	<b>No changes recommended.</b>  This submitter is seeking changes that are in conflict with Council's adopted position of the Affordable Housing Strategy. Making changes to satisfy this submission will undermine Council's adopted position.
SUB002 Anonymous	Concerns about higher density development without accompanying plan to upgrade and expand infrastructure.  Urges Council to reconsider or delay amendments until a thorough plan for infrastructure improvements is in place.	Seeks changes	<b>No changes recommended.</b>  The amendment does not allow or facilitate additional development. The amendment only requires that a proportion of new development (6% where over 20 dwellings are proposed) be affordable housing.
SUB003 Glen Waverley Resident	Building higher density housing with affordable housing attached should also be contingent on activated community space, strong perceptions of safety, and increased affordable commercial, mixed use development with provision of open space, sporting facilities and public utilities.	Seeks changes	<b>No changes recommended.</b>  The Monash Planning Scheme already requires all development to provide open space (or a cash contribution in lieu), community safety, and relevant infrastructure for the development. The affordability of commercial space is market driven and Council does not have any powers to regulate this.
SUB004 Ashwood Resident	Pleased Council taking measures to increase affordable housing.  Disagrees with methodology. Rather than set somewhat arbitrary percentage, Council should acknowledge need, then create necessary bylaws and amendment to ensure it abides by Article 25 of the United Nations Universal Declaration of Human Rights, effectively ensuring that everyone has access to affordable housing.	Seeks changes	<b>No changes recommended.</b>  Council has limited powers to require the provision of affordable housing. In developing the strategy Council considered a range of options for affordable housing. Most were ruled out as Council implementing as they



	Alternatively 6% should be an interim provision, and within 1 year Council should determine what percentage of affordable housing in new zonings is necessary.		were outside Council's powers. An action of the Affordable Housing Strategy is to advocate to State and Federal Government for increased provision of affordable housing.
SUB005 Clayton Resident	1.2 dwellings in 20 and 6 in 100 is grossly inadequate. 20% would be worthwhile. Need different demographics to ensure vibrant community.	Seeks changes	<b>No changes recommended.</b> 6% is only the contribution to be made by developers, and will be ancillary to State and Federal government provisions. It is not intended to replace State and/or Federal Government provisions.
SUB006 Government Agency		Does not oppose.	<b>Noted.</b>
SUB007 Community peak body.	Seeks 6% contribution rate be increased to 10%. The group work on the front line helping people with housing, and they see stresses as well as benefits when people find stable and affordable housing. Given the current wait lists and challenges, one property in 20 is insufficient.	Seeks changes.	<b>No changes recommended.</b> 6% is only the contribution to be made by developers and will be ancillary to State and Federal government provisions. It is not intended to replace State and/or Federal Government provisions.
SUB008 Industry peak body.	Supports Council, welcomes proposed amendments. Offers support to assist in identifying suitable community housing partners for developments in the future.	Support as exhibited.	<b>No changes requested.</b>
SUB009 Hughesdale Resident	Supports amendment as long as housing is liveable, comfortable, accessible and energy efficient.	Support as exhibited.	<b>No changes requested.</b>
SUB010 Industry peak body.	Supports voluntary contributions that are viable and transparent, but opposes mandatory contributions, particularly at local government level, particularly where no offsets or incentives are provided.	Objects.	<b>No changes recommended.</b> The affordable housing contribution is being introduced through a local policy provision. As such it is not a mandatory provision but provides a clear expectation of what Council is

	<p>If inclusionary zoning is pursued without appropriate incentives, it risks making projects financially unviable, reducing overall housing supply rather than increasing affordability.</p> <p>The submission makes many suggestions to alternatives outside the scope of this amendment, including a call for government-led solutions instead of shifting affordability costs onto residential development.</p>		<p>seeking in development. The development is then assessed as a whole.</p>
<p>SUB011 Developer</p>	<p>Unless affordable housing requirements are written into planning controls (eg PMP site), the provision of affordable housing is made on a voluntary basis, and policy drafting needs to be clear on this.</p> <p>In context of their client’s issue on how the policies will be applied to application, this will disincentive investment and development within Monash, at a time where the State is experiencing acute housing shortage.</p> <p>Feedback from affordable housing providers is that they are always seeking a larger quantity in individual locations, rather than being scattered around.</p> <p>Action 6.1 of the Housing Strategy states to ‘Investigate the development and community housing industry’s preferred delivery methods for affordable housing’ does not appear to have occurred in the drafting of the policy.</p> <p>Council should advocate and target increased affordable housing in SRL precincts and those affected by the State Government Activity Centre program.</p>	<p>Object</p>	<p><b>No changes recommended.</b></p> <p>The provisions are implement through policy rather than a control (as with the PMP site), and as such they are not mandatory.</p> <p>Discretionary affordable housing provisions are becoming more common, with other Council's such as Yarra implementing similar policies (with different contributions), and the State Government also using them as a requirement for development assessed by development facilitation.</p> <p>The policy intended to allow for flexibility, noting that not all developments will be appropriate for affordable housing. There will be many instances where housing providers do not want units in a development, for a range of reasons.</p> <p>Council will continue to advocate for affordable housing provisions elsewhere as well.</p>
<p>SUB012 Resident</p>	<p>Does not want low income individuals in our community. This invites crime and social behaviour inconsistent with hardworking people who choose to live in an area they paid high prices for.</p>	<p>Object</p>	<p><b>No changes recommended.</b></p> <p>This submitter is seeking changes that are in conflict with Council's adopted position of the Affordable Housing Strategy. Making changes</p>

	<p>Low income people should be housing in low income areas, and welcomed elsewhere when they have proven to be hard working individuals.</p> <p>Is against the amendment.</p>		<p>to satisfy this submission will undermine Council's adopted position.</p>
<p>SUB013</p> <p>Registered housing provider</p>	<p>Seeks changes:</p> <p>Seeks greater flexibility in the requirement '... should be transferred to a community housing provider in perpetuity' to enable investment and delivery of affordable housing. Some of the models that wouldn't be permitted under the proposed wording include:</p> <ul style="list-style-type: none"> <li>• Providers managing affordable housing without the provider actually owning.</li> <li>• Ground lease models offered by HomesVic.</li> <li>• Alternative models, such as Assemble's Rent to Own pathway, where affordable housing is provided to purchasers without involvement of a registered community housing provider.</li> </ul>	<p>Seeks changes</p>	<p><b>No changes recommended.</b></p> <p>Council's objective is to have affordable housing provided in perpetuity.</p> <p>While it is acknowledged there are many other models that can deliver alternative benefits, these should be negotiated on a case by case basis with the objective being to ensuring a better outcome.</p> <p>The provisions are being implemented through policy, and as such are not mandatory and allow for variation in how they are provided.</p>
<p>SUB014</p> <p>Landowner</p>	<p>Raises concerns:</p> <ul style="list-style-type: none"> <li>• Unclear from the MAHS how trigger of 20 dwellings was arrived at.</li> <li>• Threshold and rate may negatively influence future redevelopment opportunities without a meaningful uplift opportunity, value capture or other mechanism.</li> <li>• Needs to more appropriately consider development feasibilities before implementation into the scheme (eg. affordable housing for fixed term duration).</li> <li>• Build to sell and build to rent developments will require separate considerations with regard to affordable housing.</li> </ul>	<p>Seeks changes.</p>	<p><b>No changes recommended.</b></p> <p>The 20 dwelling threshold is based on developments within Monash.</p> <p>It is acknowledged that some smaller developments just over 20 may be reduced to 19, reducing the overall number of number of dwellings developed.</p> <p>Provision of affordable housing has been an ongoing issue, and temporary provision will only provide a temporary solution.</p>

**SUB001**

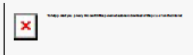
**Daniel Borton**

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**Suburb**

SUB001

[REDACTED]

**Postcode**

[REDACTED]

**Telephone number**

[REDACTED]

**Submission comments**

Forcing developers to allow for more affordable housing etc just passes the cost onto other members of the public buying into such developments, including those who are looking to downsize etc, which in turn reduces the churn of existing housing.

There is no free lunch. Someone has to pay for it, which ends up being the owners of the rest of development. Additionally the whole community whole pays for the social issues which come with such a ill thought out strategy. We should be making Monash more upmarket, not dragging it down.

Wake up Monash council, your role is not force social housing into a safe and prosperous community. We don't need some green social housing woke agenda. Social and affordable housing is a state issue. Not a council issue. housing!!!

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**SUB002**

**Daniel Borton**

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**First Name**

Chadstone

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Resident

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Email

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[REDACTED]

**Submission comments**

I am writing to express my concerns about the proposed plans for subdividing or constructing larger multi-level apartment blocks within the Monash council. While I understand the need for urban development, I believe this approach is not

SUB002

sustainable given the current infrastructure challenges.

At present, Monash lacks sufficient roads, parking spaces, public transport options (which is improving with better train services), parkland, and other essential services needed (especially hospitals) to accommodate the additional population these developments will bring. Without significant investment in these critical areas, it seems unlikely that the area can cope with the increased demand, both for residents and for the broader community.

It is vital that any plans for urban growth in Monash are accompanied by a comprehensive strategy to upgrade and expand infrastructure. Sustainable, long-term planning should prioritize not only increasing housing stock (where there is vacant land) but also ensuring the community's overall livability and resilience.

I urge the council to reconsider or delay these developments until a detailed and thorough plan for necessary infrastructure improvements is in place. Expanding Melbourne outer fringes or expanding country Towns will create much more sustainable state. Rather than packing everyone into the same councils.

Thank you for your attention to this matter.

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**SUB003**

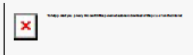
**Daniel Borton**

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**Suburb**



**SUB003**

[REDACTED]

**Postcode**

[REDACTED]

**Telephone number**

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**Submission comments**

Building higher density with affordable housing attached to ratio of standard housing should also be fundamentally contingent on activated community space, strong perceptions of safety, and increased affordable commercial, mixed use development with provision of open space, sporting facilities and public utilities.

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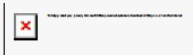
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**Postal address**

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**Suburb**

SUB004

[REDACTED]

**Postcode**

[REDACTED]

**Telephone number**

[REDACTED]

**Submission comments**

Dear Council,

I am very happy you are taking measures to increase the amount of affordable housing in Monash.

From your document, I gather that the amendment calls for a 6% minimum.

Rather than set what appears to be a somewhat arbitrary percentage number, I would call on the Council to acknowledge, and then create the necessary bylaws and amendments to ensure that it abides by Article 25 of the United Nations Universal Declaration of Human Rights, which states:

"Everyone has the right to a standard of living adequate for the health and well-being of (themselves) and of (their) family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control".

The Article is basically saying everyone has a right to adequate housing to ensure the health and well-being of themselves and their family.

In light of this, has the Council determined that a 6% provision for affordable housing will be adequate to ensure that all low income people in the City of Monash have access to adequate housing?

If not, I suggest Council passes the current provision for 6%, and then within a year determine what percentage of affordable housing in new zonings is necessary

**SUB004**

to ensure that everyone in Monash has access to affordable housing. Once that percentage is determined, then I call on council to make a further amendment and change the 6% to the percentage required to meet its obligations under the UN Declaration of Human Rights.

Yours sincerely,



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SUB005

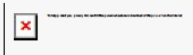
**Daniel Borton**

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**Suburb**

██████

**Postcode**

SUB005

**Submission comments**

Surely the council can be more ambitious than 6% affordable housing? In a development of 20 properties, only 1.2 will be affordable, which I assume will mean only 1 property in reality. In a development of 100, only 6 will be affordable. These outcomes seem grossly inadequate.

Given the state of the housing market and its impacts on our society 20% would be worthwhile. Consider the future of our area - people need to be able to afford to live here. We need different demographics across ages and incomes to ensure a vibrant community.

Be ambitious Monash.

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SUB006



Department of Energy, Environment  
and Climate Action

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[deeca.vic.gov.au](http://deeca.vic.gov.au)

Andi Diamond  
Chief Executive Officer  
Monash City Council  
P O Box 1  
GLEN WAVERLEY VIC. 3150  
By email [strategicplanning@monash.vic.gov.au](mailto:strategicplanning@monash.vic.gov.au)

Ref: 7886

Dear Mx Diamond

**REFERENCE NUMBER: AM C174MONA**  
**PROPOSAL: IMPLEMENT MONASH AFFORDABLE HOUSING STRATEGY**  
**ADDRESS: ALL LAND AFFECTED BY THE MONASH PLANNING SCHEME**

Thank you for your correspondence of 28 January 2025 pursuant to Section 19 of the *Planning and Environment Act 1987* (the Act).

Council has given the Department of Energy, Environment and Climate Action (DEECA) notice of a proposed planning scheme amendment that to implement the recommendations of the Monash Affordable Housing Strategy (Monash City Council, September 2023). The amendment proposes changes to the Municipal Planning Strategy, Planning Policy Framework and other relevant provisions of the Monash Planning Scheme to facilitate an increase in the provision of affordable housing across Monash. The proposed changes also provide additional policy context that recognises that there has been a significant decline in housing affordability in Monash.

DEECA has considered the above application and does not oppose the amendment.

If you have any queries regarding this matter, please contact [REDACTED] on [REDACTED] or at [pe.assessment@deeca.vic.gov.au](mailto:pe.assessment@deeca.vic.gov.au).

Yours sincerely

[REDACTED]

[REDACTED]  
Senior Planning Officer  
Planning Services (Central East)  
DEECA Planning and Environment Assessment

4/03/2025

Any personal information about you or a third party in your correspondence will be protected under the provisions of the *Privacy and Data Protection Act 2014*. It will only be used or disclosed to appropriate Ministerial, Statutory Authority, or departmental staff in regard to the purpose for which it was provided, unless required or authorized by law. Enquiries about access to information about you held by the Department should be directed to [foi.unit@delwp.vic.gov.au](mailto:foi.unit@delwp.vic.gov.au) or FOI Unit, Department of Energy, Environment and Climate Action, PO Box 500, East Melbourne, Victoria 8002.



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SUB007

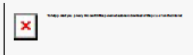
**Daniel Borton**

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**Suburb**



SUB007

[REDACTED]

**Postcode**

[REDACTED]

**Telephone number**

[REDACTED]

**Submission comments**

The Ashwood Chadstone Partnership Group (ACPG) very much appreciates the efforts of Monash City Council to improve the supply of public/social housing in the municipality. The ACPG has noted the intention, where new residential areas of 20 dwellings are being developed, to require that just 6% of these be public/social housing, or the equivalent of just one public/social housing property.

The Ashwood Chadstone Partnership Group would urge that Council increase this from 6% to 10% as:

- \* Victoria's waiting lists for public/social housing are very long, forcing tens of thousands to rent and the escalation of rents and the shortage of rental properties affordable to those even on average incomes, requires an urgent response;
- \* the Eastern Metropolitan Region has less public housing per 100,000 head of population than elsewhere in Melbourne, so the shortage here is particularly acute;
- \* members of the Ashwood Chadstone Partnership Group work on front lines with people in transitional housing, social housing, and public housing as well as engaging with people suffering homelessness. We see the personal reality of points 1 & 2. But we have also seen the great benefits that come to people when they finally obtain stable and affordable accommodation.
- \* the current lack of affordable housing and housing stress is a long term issue that needs a long term responses like the proposed amendment. We support the

SUB007

integration of public/social housing in building developments as it will facilitate integration of people into the wider community. But we think the size of the housing challenge means that that proposed ratio of one property in 20 is insufficient and would urge an increase from 6% to 10%.

Regards,

[REDACTED]

Convenor

The Ashwood Chadstone Partnership Group

**Upload submission or a supporting document**

- [AC Demographic Profile 2021.docx](#)

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SUB008

6 March 2025



Dear Monash City Council

The Community Housing Industry Association Victoria (CHIA Vic) welcomes the opportunity to provide feedback on Amendment C174.

## About CHIA Vic

CHIA Vic is the peak body that represents the not-for-profit community housing sector in Victoria. CHIA Vic's member community housing organisations (CHOs) are committed to providing safe and stable homes for people that can't afford another place to live. Our members include all CHOs registered as Housing Associations or Housing Providers under the Victorian regulatory framework for non-profit housing organisations.

## Affordable Housing need in Monash

Affordable Housing<sup>1</sup> is critical to Monash's economic productivity, growth, liveability and wellbeing. Within the Monash local government area, it is estimated that 3,800 households did not have appropriate housing on Census night in 2021. If no action is taken, this is estimated to grow to 6,100 households in 2041<sup>2</sup>. The impact of this will extend beyond the households without appropriate housing – including to local business owners who will likely face challenges hiring key workers.

## Feedback

CHIA Vic would like to congratulate Monash City Council for your initiative to implement the recommendations of the *Monash Affordable Housing Strategy (2023)* by making changes to the Monash Planning Scheme. We welcome the proposed changes to the Monash Planning Scheme through Amendment C174, especially:

- The recognition of significant decline in housing affordability in Monash, and the intention to 'prioritise, facilitate and increase the availability of affordable housing' (Clause 02.03-05).
- The addition of a housing affordability clause (Clause 16.01-2L) with an explicit objective to 'facilitate the provision of social and affordable housing' in Monash; strategies to achieve this; and reference to the *Monash Affordable Housing Strategy (2023)*. In particular, we welcome

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<sup>1</sup> Affordable Housing (capitalised) in this document refers to the Planning and Environment Act (1987) definition of Affordable Housing, which includes social housing.

<sup>2</sup> University of New South Wales City Futures Research Centre - <https://cityfutures.adu.unsw.edu.au/cityviz/housing-need-dashboard/>

SUB008

the inclusion of policy guidelines for affordable housing contributions which explicitly outline:

- The amount of affordable housing to be contributed.
- The form of affordable housing contributions.
- That the affordable housing contribution is to be transferred to a community housing provider in perpetuity.

Monash's proposed amendments clearly communicate its Affordable Housing goals to developers and community housing organisations. This will significantly support the delivery of more affordable housing in Monash, and CHIA Vic congratulates Monash Council on these proposed amendments.

Because of the ongoing impacts of colonisation, a disproportionate number of First Peoples in Victoria do not have a safe, secure and appropriate place to call home. As Monash continues to implement the *Monash Affordable Housing Strategy (2023)*, we would encourage you to consider the housing needs of First Peoples and how Monash could support the delivery of homes needed for First Peoples.

## Additional CHIA Vic support

CHIA Vic's Policy Officer, [REDACTED] supports developers and local government to learn more about the community housing sector and identify community housing partners for Affordable Housing developments. [REDACTED] and the CHIA Vic team would be happy to assist Monash in Affordable Housing growth in your municipality. If you would like to discuss this submission further or ways in which CHIA Vic can assist in your Affordable housing work, please contact [REDACTED].

Yours sincerely



Sarah Toohy  
Chief Executive Officer, CHIA Vic

SUB009

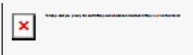
**Daniel Borton**

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**Suburb**

SUB009

[REDACTED]

**Postcode**

[REDACTED]

**Submission comments**

We are in favour of these equitable housing opportunities provided they are actually liveable, comfortable, accessible and energy efficient, so as to enhance affordable healthy living.

To view all of this form's submissions, visit

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7 March 2025

Daniel Borton  
Senior Strategic Planner  
City of Monash  
293 Springvale Road  
GLEN WAVERLEY VIC 3150

via email: [strategic.planning@monash.vic.gov.au](mailto:strategic.planning@monash.vic.gov.au)

Dear Mr Borton,

The Urban Development Institute of Australia, Victoria (UDIA) welcomes the opportunity to participate in the public consultation process for the City of Monash's (the City) proposed Amendment C174, implementing the City's proposed Affordable Housing Strategy (the Strategy).

UDIA recognises that Amendment C174 aims to implement changes to the Monash Planning Scheme as recommended by the Strategy, with a focus on the provision of affordable housing. We thank the City for the opportunity to put forward this submission, which outlines a range of key issues of concern, noting this does not constitute an exhaustive list. We also look forward to further opportunities to engage with the City on this issue as it progresses.

#### About UDIA Victoria

UDIA is a not-for-profit research, advocacy and educational organisation supported by a membership of land use and property development entities, across the private sector and Victoria's public service.

We are a signatory to the State Government's Affordability Partnership, whose focus is on meeting the objectives of Victoria's Housing Statement: building 800,000 new homes by 2034 – 80,000 homes per year, over the next decade.

Our priority is ensuring the development industry can continue to deliver a consistent pipeline of high-quality, diverse housing that is affordable to buy and rent for the growing number of people who choose to call Victoria home.

UDIA considers affordable housing to be critical social infrastructure that has direct social and economic benefits in terms of Victoria's ongoing productivity, livability, and prosperity. Housing affordability underpins our advocacy, which seeks to ensure policy and planning decisions prioritise housing affordability by providing investment certainty, facilitating robust housing supply, and ensuring that government policy considers affordability impacts.

#### Proposed Amendment C174: Monash Affordable Housing Strategy

Amendment C174 proposes to:

- a) Identify the provision of affordable housing as a key issue in the Municipal Planning Strategy of the Monash Planning Scheme.
- b) Introduce policy to encourage the provision of affordable housing in developments, more specifically for the provision of 6% of housing in developments of 20 or more dwellings.

We acknowledge the City has proposed the 6 per cent rate based on its interpretation that this contribution aligns with State Government policy in redevelopment precincts such as Fishermans Bend and West Melbourne.

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Urban Development Institute of Australia (Victoria)  
55 Collins Place, Melbourne VIC 3000  
Page 1 of 3

SUB010

The State Government defines “affordable” in the Planning and Environment Act 1987 as “housing, including social housing, that is appropriate for the housing needs of very low-, low-, and moderate-income households”. The City of Melbourne Affordable Housing Strategy 2020-2030 states that, in some instances, private market housing may qualify as affordable housing if it is affordable for very low to moderate income households.

The provision of affordable and social housing has been in steep decline for decades – a result of significant underinvestment by successive state and federal governments. UDIA shares the City’s view that the chronic undersupply of social and affordable housing must be addressed. However, its provision cannot come at the cost of delivering new housing affordably to the private market. It must be appropriately funded by government.

There is ongoing policy discussion about the most appropriate mechanism to fund affordable (including social) housing, which often posits taxing ‘profits’ or ‘windfall gains’ from residential development to fund affordable housing. This assumes the new housing being levied against is not affordable, ignores the fact that a cross-subsidy will be created whereby new housing solely funds new affordable housing, and has no regard for the impact on the viability of residential development projects that may well not proceed. If a development makes provisions for a given percentage of affordable housing, the cost of this contribution must be absorbed by the rest of the dwellings in the development, inflating dwelling prices for non-affordable housing and negatively impacting overall affordability. Worse, this provision may render the project commercially unviable.

#### **Housing diversity and choice through Council’s planning policies**

UDIA supports policies that promote housing diversity and choice, ensuring a mix of housing typologies to meet the needs of a growing and changing population. However, achieving genuine diversity requires streamlined planning approvals to encourage new supply and reduce delays; zoning settings that enable higher densities in appropriate locations such as activity centres and near public transport; and greater flexibility in design standards that allow for innovative housing solutions.

#### **Mandating affordable housing contributions when land is being rezoned and inclusionary zoning**

UDIA supports voluntary contributions that are viable and transparent, but opposes mandatory contributions, particularly at a local government level, which often increase development costs, leading to higher prices for market housing; reduce investment attractiveness, particularly if no incentives or offsets are provided; and limit supply, as fewer developments may be financially feasible under these requirements.

A balanced approach should explore density bonuses, financial incentives, or cash-in-lieu options to ensure affordable housing contributions do not reduce overall housing supply.

Mandatory inclusionary zoning often jeopardises residential development viability, unless it is accompanied by appropriate supportive incentives, such as: density uplifts to offset the cost of delivering affordable housing; reduced development contributions or fast-tracked planning approvals; and Government co-investment to ensure viability.

If inclusionary zoning is pursued without appropriate incentives, it risks making projects financially unviable, reducing overall housing supply rather than increasing affordability.

#### **Affordable housing on appropriate Council-owned land and in Council developments**

Leveraging Council-owned land presents a strong opportunity for affordable housing delivery. UDIA supports this approach, provided that: the City facilitates mixed-use, mixed-tenure developments, integrating affordable housing with broader community needs; development models and partnerships are considered to minimise upfront costs and encourage investment; and sites are well-located with access to transport, jobs, and services to support long-term sustainability.

Maximising public land opportunities will play an important role in delivering social and affordable housing at volume across Victoria.



SUB010

#### Proposed Amendment in the context of Plan for Victoria

UDIA urges the City to re-evaluate the implementation of Proposed Amendment C174 into the Monash Planning Scheme, with consideration of the State Government's most recent policy announcements regarding social and affordable housing, including municipal-specific targets, flagged in *Plan for Victoria*. The proposed 6 per cent rate does not align with the Plan's affordable housing policy. It states that "as councils embed housing targets into planning schemes", Government will "consider developing locally specific targets for social and affordable housing for inclusion in planning schemes". It also flags exploring "simpler rules for affordable housing as a part of the review of the Planning and Environment Act 1987 so the Minister for Planning and councils can obtain a fair and equitable affordable housing contribution as part of a new development."

Instead of shifting affordability costs onto residential development, we call for government-led solutions such as concessional finance programs that encourage private sector participation in affordable housing delivery. Governments needs to provide incentives to support the development of a range of housing types, including townhouses, apartments, and dual-occupancy units, particularly in areas with good access to public services, transport and amenities. Zoning policies also needs to be sufficiently flexible to allow for higher-density developments in appropriate locations.

#### Locally specific targets

In accordance with State Government policy, we encourage the City to work with State Government to develop affordable housing targets specific to its municipality and consider the application of incentives, rather than implementation of mandated minimums, to address the City's need for affordable housing.

UDIA will continue to work closely with local, state and commonwealth government to ensure subsidised and market affordable housing can be delivered at volume.

#### Further discussion

We thank you for the opportunity to raise our concerns and believe it is crucial to address these issues to ensure that planning frameworks remain flexible and aligned with broader state objectives.

If you wish to discuss these matters further, please do not hesitate to contact UDIA's Director of Policy, [REDACTED] at [REDACTED]

Yours sincerely,

[REDACTED]

Linda Allison  
CEO, UDIA Victoria

SUB011

PLANNING & PROPERTY | **PARTNERS**  
LAWYERS & CONSULTANTS

7 March 2025

Daniel Borton  
Senior Strategic Planner  
Monash City Council

**By email:** strategicplanning@monash.vic.gov.au

Dear Daniel,

**MONASH PLANNING SCHEME  
AMENDMENT C174mona**

We act on behalf of DM Property in relation to proposed Amendment C174 to the Monash Planning Scheme ('Planning Scheme') which seeks to implement the Monash Affordable Housing Strategy ('Housing Strategy').

Our client is a local residential developer based in Melbourne with several projects across Metropolitan Melbourne and regional Victoria, including a current project within Monash associated with a Development Plan amendment at 2 Collegium Avenue, Wheelers Hill. Several of our client's projects are currently under construction, where they are actively delivering additional housing in response to the well documented housing crisis evident across the State.

Our client is supportive of the need for additional affordable housing across the State, and have partnered with various affordable housing providers in some of their projects. Our client generally supports the notion behind proposed Amendment C174mona, with proposed policies at Clauses 02.03-5 and 16.01-2L *encouraging* and *facilitating* additional affordable housing projects.

Our client is however concerned about how the Council will ultimately apply these policies when assessing various planning permit applications, and enforcing and mandating such policies. Excluding examples within Monash such as the PMP Printing Precinct where affordable housing requirements are written into its planning controls, development applications with an affordable housing contribution are otherwise made on a voluntary basis and the policy drafting needs to be very clear on this. In context of our client's issue on how the policies will be applied to application, the flow-on impact of these policies will only impact on development feasibilities, cost, time and delivery. This will disincentive investment and development within Monash, and counter-intuitive at a time where the State is experiencing acute housing shortage, making it difficult for Monash to meet its housing targets as set out in the recently released *Plan for Victoria*.

Through our client's experience in delivering projects that contain affordable housing, the feedback they have received from various affordable housing providers is they are always after a larger quantity. This is due to the ease in either managing or owning several home in the one location, rather than these being scattered across various developments. The stated quantities within the exhibited policies are therefore unrealistic and unlikely to be taken up by such affordable housing providers.

Action 6.1 of the Housing Strategy states to '*Investigate the development and community housing industry's preferred delivery methods for affordable housing*' this does not appear to have occurred in the drafting of the policy and the blanketed approach. Further insight from affordable housing providers is required on such delivery methods and their preferred locations. This is particularly relevant in context of recent State Government announcements and projects within Monash including the Activity Centre Program and release of the Suburban Rail Loop East Structure Plans, where Council should advocate and target these areas for additional affordable housing given the immediacy of services and infrastructure aligned with these locations. The otherwise blanketed approach proposed by Amendment C174 will not result in a desirable or suitable housing product.

Planning & Property Partners Pty Ltd  
ABN 63 343 015 948  
13/1 Collins Street, Melbourne VIC 3000  
Telephone: +61 3 8626 9000  
Email: admin@pppartners.com.au  
www.pppartners.com.au

Legal Directors  
Mark Naughton, Chris Taylor,  
Amanda Johns, Tyrone Rath,  
Scott Edwards & Rob McKendrick

Non-Legal Directors  
Paul Little, Nicholas Touzeau,  
Johan Moylan & Sue Zhang



SUB011

Accordingly, whilst our client recognises and supports the need for additional affordable housing, it is for the above reasons that our client objects to draft Amendment C174 in its current form.

As Amendment C174 progresses through its statutory processes, we request that any further information in relation to the amendment be provided through this office.

Should you have any queries in relation to this submission, please do not hesitate to contact the undersigned on [REDACTED] (email: [REDACTED] [u](#)).

Yours faithfully,

[REDACTED]

[REDACTED]

**Planning & Property Partners Pty Ltd**

SUB012

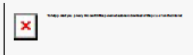
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**Submission comments**

WE pay a high premium to purchase a house in a good suburb for our families. I do not see that inviting low income individuals into our community is a good thing as it changes the character of the suburb, invites crime and social behavior that is

SUB012

against the ethos of hardworking people who choose to reside in an area that they have paid high prices for. Low income folks should be housed in low income areas and welcomed into other areas of the community when they have proven to be hard working individuals. Our suburbs have many elderly people who are at risk from those who do not respect these work values. I am against this proposal.

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# Assemble

SUB013



3 March 2025

To: Monash City Council  
PO Box 1  
Glen Waverley VIC 3150

Dear Andi Diamond,

**Re: Acknowledgement and Support for Amendment C174mona**

I am writing on behalf of Assemble Communities (Assemble), a property developer and manager delivering new homes and providing better and more diverse housing choices for renters and homebuyers right across the country. We have received the correspondence regarding Amendment C174mona to the Monash planning Scheme and wish to acknowledge and express our support for the Council's proactive steps towards increasing the supply of affordable housing in the City of Monash.

We commend the Council for its efforts to implement the recommendations of the Monash Affordable Housing Strategy (September 2023) through the proposed changes to the Municipal Planning Strategy, Planning Policy Framework, and other relevant provisions. We believe these changes are essential to addressing the significant decline in housing affordability in the area.

Housing affordability in Victoria, particularly in Melbourne, has been a growing concern. Melbourne is currently the 4th least affordable major housing market in the world. The median price for a dwelling in Greater Melbourne has risen to \$665,000, making it increasingly difficult for medium-income families to save for a home deposit. Additionally, only 0.9% of private rental properties in Greater Melbourne are affordable for households receiving income support payments. The cost of living in Melbourne is also high, with a family of four estimated to need around \$5,859.6 AUD per month, excluding rent. These factors contribute to a housing crisis that affects many residents, particularly those on lower incomes.

Assemble is committed to providing affordable housing solutions, and we are pleased to see that the amendment aligns with our mission. We generally acknowledge and support the proposals issued in Amendment C174mona, which aim to prioritize and facilitate the increase of affordable housing in the municipality.

After review of the Amendment, we propose the following changes are made:

- The wording outlined within clause 16.01-2L, states that *'Affordable housing... should be transferred to a community housing provider in perpetuity'*. Greater flexibility is needed to this clause to enable investment in and delivery of affordable housing, without the need of for a CHP to own property in perpetuity. We note some of the affordable housing outcomes which wouldn't be permitted under the wording currently proposed, including:
  - CHP's managing affordable housing without the CHP owning the property.
  - Ground Lease Models offered by HomesVIC
  - Alternative models, such as Assemble's Rent to Own pathway where affordable housing is provided direct to purchasers without the involvement of a CHP.

19 Thompson Street, Kensington 3031, Victoria  
ABN 44 624 001 645 | assemble.com.au | 1800 181 295

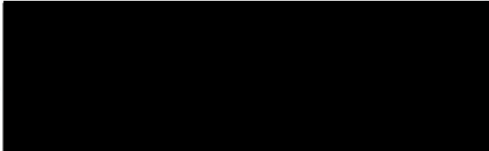
Page 1/2



SUB013



We appreciate the opportunity to provide our input and fully support the adoption of Amendment C174mona. Please do not hesitate to contact me if you require any further information or wish to discuss our submission in more detail.



Carolyn Viney  
Chief Executive Officer



SUB014



7 March 2025

Strategic Planning  
Submission to Amendment C174mona  
Monash City Council  
PO Box 1  
GLEN WAVERLEY VIC 3150

**Emailed to:** [Strategic.planning@monash.vic.gov.au](mailto:Strategic.planning@monash.vic.gov.au)

Dear Sir/Madam,

**Submission to Amendment C174 – Monash Planning Scheme  
64-74 Virginia Street, Mount Waverley VIC 3149**

Woolworths Group Limited is the owner of 64-74 Virginia Street, Mount Waverley (“property”) and make the following submission to Amendment C174 which we understand, amongst other matters, seeks to:

- Introduction of Clause 16.01-2L to the Monash Planning Scheme which addresses housing affordability through new policy guidelines in support of increased affordable housing.
- Introduction of a new background document at Clause 72.08 (Background Documents) to include the *Monash Affordable Housing Strategy* (Monash City Council, September 2023) which has informed the preparation of the above proposed policy ordinance.

The property is located on the southern side of Virginia Street and is currently contained within the Commercial 1 Zone (C1Z). It forms part of the Mount Waverley Activity Centre. Refer to Figure 1 below.

Woolworths Group Limited  
ABN 88 000 014 6751

1 Woolworths Way, Bella Vista NSW 2153  
PO Box 8000, Baulkham Hills NSW 2153  
T: 02 8885 0000 W: [woolworthsgroup.com.au](http://woolworthsgroup.com.au)



SUB014



Map 1 – Aerial Photo of Site Location



Map 2 – Cadastral Plan of Site Location

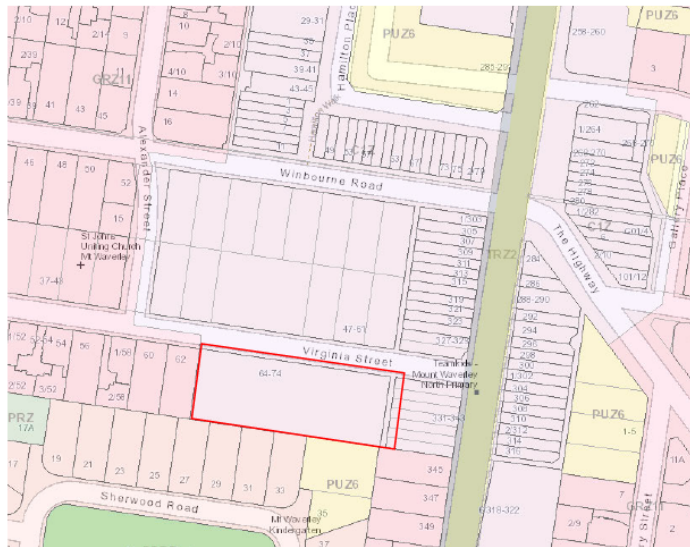


Figure 1

Woolworths Group Limited  
ABN 88 000 014 6751

1 Woolworths Way, Bella Vista NSW 2153  
PO Box 8000, Baulkham Hills NSW 2153  
T: 02 8885 0000 W: woolworthsgroup.com.au

SUB014



### Submission

Having reviewed the exhibited material accompanying proposed Amendment C174 to the Monash Planning Scheme, we raise the following items for consideration:

- The introduction of policy guidelines which outline consideration of a minimum of 6% affordable housing within residential development of 20 or more dwellings.
  - The quantitative minimum of 20 or more proposed dwellings in triggering the policy consideration of affordable housing has not been appropriately informed as part of the strategies set out within the *Monash Affordable Housing Strategy 2023*. It is unclear how the informing research within the strategy has guided the implementation of the minimum dwelling number.
  - A 6% affordable housing contribution in conjunction with at minimum 20 new dwellings within the City of Monash may negatively influence future redevelopment opportunities at this scale in the absence of a meaningful value capture, uplift opportunity or similar mechanism being provided to proponents.
- It is our view that the introduction of affordable housing policy needs to appropriately consider development feasibilities before any implementation into the Monash Planning Scheme. As an example, but not limited to, the ability to provide affordable housing for a fixed duration (i.e 10-15 years) managed by a registered community housing provider. (CHP)
- We also consider that Build to Sell type developments vs Build to Rent type developments will require separate considerations with regard to affordable housing outlined as part of any future policy.

We look forward to being kept informed of the progress of Amendment C174 and we respectfully reserve the right to add to this submission, either as part of a further submission to the Council and/or as part of a future submission before an Independent Planning Panel Hearing called in relation to this matter.

Should you have any queries regarding this submission, please do not hesitate to contact the undersigned via the email address below.

Yours sincerely,

████████████████████

Woolworths Group Limited  
ABN 88 000 014 6751

1 Woolworths Way, Bella Vista NSW 2153  
PO Box 8000, Baulkham Hills NSW 2153  
T: 02 8885 0000 W: [woolworthsgroup.com.au](http://woolworthsgroup.com.au)