



Sunday, 22 April 2018

## **Submission to 23 April 2018 FCC Meeting**

### **FCC Housing Strategy**

**The Seaford Community Committee (SCC) recommends that the Frankston Housing Strategy 2017 Version 3 (Final Draft) should not be accepted in its current state.**

SCC is very disappointed with the Officers Responses given in relation to:

- Seaford Wetlands
- Lack of Parking Provision
- Reducing Garden Areas
- Frankston North Potential for Growth

#### **1. Seaford Wetlands and Kananook Creek**

**Officers Response: "explore the strategic justification in applying a Design and Development Overlay (DDO) within the wetlands environs"**

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However, the FHS Final Draft states "the other initiative from State Government is **to avoid any future use of DDOs** as well as getting existing DDOs to match with new mandatory height limit within General (**GRZ**) and Neighbourhood (**NRZ**) Residential Zones (hence the change to height in the GRZ covering Nepean Highway Seaford to match DDO6)

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Therefore, suggesting a new DDO for the Wetlands and Kananook Creek is **NOT** a solution. The **residential zone** applied must achieve what is needed and that can be done with an appropriate NRZ limiting height and increasing the percentage of permeable land.

**Officers Response: "Seaford Wetland is considered sacred in Frankston. The minimal area surrounding the wetlands was removed due to the lack of justification that the panel assessed in C95"**

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This means give **more justification** for your zoning not give up and remove it. If you really consider the area sacred, FCC needs to make sure it is protected.

With the latest changes to GRZ (11m/3 storey) it should be possible to prove that this zoning would be detrimental to the environment and character of the area and that it does not adequately recognize the numerous planning scheme overlays prevalent in the Seaford area e.g. Land Subject to Inundation (LSIO), storm water flooding (SBO) or bushfire (WMO).

The Final Draft states "Minimal Change areas have been delineated in locations that.... are identified as being acutely vulnerable to inundation due to stormwater, flooding and included within the Special Building Overlay"

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This is NOT true! Refer Fig 52 - Minimal Change areas - does not represent this and STILL shows no relationship to Fig 40 - Other Planning Scheme Overlays - there are no Minimal Change areas in Seaford.

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Anyone living in Seaford will tell you that the extent of flooding has been steadily increasing in our streets with each and every new sub division.

## 2. Higher Density Housing and lack of parking

**Officers Response: "Any concerns regarding traffic and car parking may be reasonably addressed through permit requirements"**

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Since it is now common practice to waive or reduce car parking requirements, this is not a reasonable solution. Enough free land to accommodate off street parking must be a requirement of the zone schedules especially in narrow residential streets. State Government garage requirements are inadequate and usually just used as storage. We are not inner Melbourne, we do not have an extensive tram and train network servicing our suburbs and never will. The majority of our residents require a car to commute to work and more and more are now parking in the street creating traffic hazards.

## 3. Reduced Garden Areas due to sub division

**Officers Response: "While Council can propose Schedules to the Zone to facilitate more prominent requirements than standard ResCode, Council does not have the ability to amend or provide an alternative Minimum Garden Area Requirement"**

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It is insufficient to state "Council can propose" – Council MUST designate schedule requirements to protect our neighbourhoods – especially the site area covered by **pervious surfaces** (e.g. 40% in areas subject to inundation OR in close proximity thereto) and the minimum street setback (most are 'none specified' which is simply not good enough).

FCC needs to use Zone Schedules to advantage in sensitive areas – not cop out with "none specified".

## 4. Frankston North Potential

**Officers Response: "construction of 3 storey apartment buildings is now permitted with the GRZ. As such, the area in question is now able to support higher density development".**

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Belvedere has been recognized as an Activity Centre suitable for substantial change/growth. What constitutes a Neighbourhood Activity Centre if not shops, community centre, parks and bus services? So why is Mahogany Avenue Frankston North not considered for substantial change as well as Belvedere? It looks like the full potential for growth in Frankston North has been overlooked by FCC at the expense of other areas. <https://www.planning.vic.gov.au/policy-and-strategy/activity-centres/activity-centres-overview>

## 5. Recommendations made in SCC's Submission that have been ignored, but should be considered:

- FCC to provide more Pocket Parks where residential development is intensified
- Protection of Seaford Village Centre to maintain Coastal Village character i.e. the village itself should be NRZ
- FCC to acknowledge the potential for sea-rise and future flooding across most of the Seaford area
- FCC to establish transitional (staggered) height zones by the use of specified scheduled heights in adjoining residential zones. This would maintain the amenity of the neighbouring residences and is in keeping with good Urban Design principles.

### Information only

Change Area translation to Residential Zone

Minimal Change Area	Neighbourhood Residential Zone (NRZ – mandatory 9m - 2 storeys)
Incremental Change Area	General Residential Zone (GRZ – mandatory 11m – 3 storeys)
Substantial Change Area	Residential Growth Zone (RGZ – discretionary 13.5m)

Councils can increase State Government mandatory limits but not reduce them.

Submission Reference numbers: 18 = Seaford Community Committee, 25 = SHAC, 21 = Long Island

“Minimal Change areas have been delineated in locations that.... are identified as being acutely vulnerable to inundation due to stormwater, flooding and included within the Special Building Overlay” (blue and purple in fig 40 below). Have they really? There is no pink in Seaford in Fig 52.

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