



Frankston Housing Strategy 2017 Update

Submission from Seaford Community Committee

The Seaford Community Committee (SCC) acknowledges that housing growth is required across Melbourne and that the Frankston City Council (FCC) via its Housing Strategy 2017 must meet its obligations in this regard.

The proposal to move the Regional Growth Zone from Seaford Station to the Belvedere Retail Centre is a welcome change as Frankston-Dandenong Road has the capacity to accommodate increased traffic flow, taller buildings and is already a less family-friendly area (i.e. you would not have kids playing ball in the street, unlike the streets around Seaford Primary School).

It is however very disappointing to see the previously proposed NRZ protection around the Seaford Wetlands has been removed from the strategy.

The recommendations presented below are intended to enhance the FCC Housing Strategy 2017 whilst ensuring a better outcome for our City.

1. Meeting Population Demands

Prior to the extraordinary population growth Melbourne is currently experiencing, measuring growth based on Residential Building Approvals (page 29) may have been sufficient.

SCC suggests that this is no longer sufficient and the FCC may need more justification of its housing projections to receive acceptance.

The recommendation under 12.5 Monitoring and Industry Engagement to: *“D1. Implement a co-ordinated development data collection system. This central system should house both planning permit and building permit information at a minimum, and include the following inputs where possible....”* will be vital to future strategies but more data is also needed now.

On page 29, the Strategy states: *“Note: that when new dwellings are created in existing built up areas, this may involve the demolition of existing dwellings. A rule of thumb is that in Frankston City, for each 100 new dwellings created, there are at least 8 existing dwellings that are lost. So the results reported here are not ‘net’ increases of new dwellings.”*

As the availability of new land decreases and we rely more heavily on subdividing built-up areas, the number of dwellings lost will likely increase and the figures of Building Approvals alone will be even less appropriate.

SCC recommends:

- ***Figure 26 Building Approvals include nett change in number of bedrooms to clearly show that accommodation has and will increase***



Orabel 78 Nepean Highway

Note: Does the approved development at 78-83 Nepean Highway for 140 apartments report as One Building Approval? Reporting the bedroom gain of 259 is a more convincing statistic (100 x 2 bedrooms, 33 x 1 bedroom, 2 x 3 bedrooms and 5 x 4 bedrooms)

2. Maintain Housing Diversity

The Housing Strategy in its current form does not encourage sufficient housing diversity.

If we become a city of just units and apartments, the numbers per household have to decline as there will be nothing to appeal to a family unit. Attracting more families also secures service jobs in the area. Schools, child-minding centres, sporting facilities, etc. remain viable.

The statement from 2.2 Local Planning Policy (Page 8) that “*low density residential areas at Frankston South and rural residential areas to the South and East of Langwarrin contribute to housing diversity*” is correct BUT these areas only cater for a limited number as they are beyond the price reach of many. It should also be suggested that in maintaining a slightly higher percentage of single dwellings than Greater Melbourne, we are contributing to housing diversity in a way the inner suburbs cannot, i.e. it is not a bad thing.

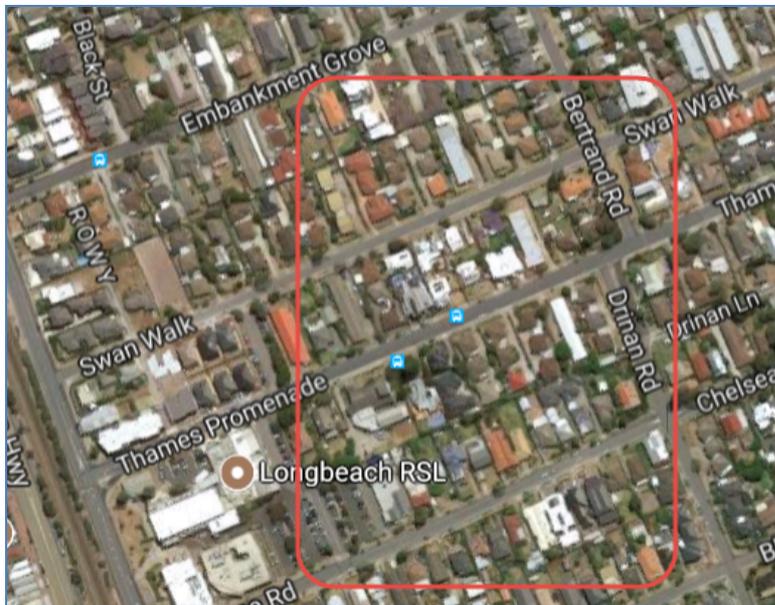
SCC recommends:

- ***FCC require adequate increases in accommodation before demolition is approved e.g. demolishing a structurally-sound 3 bedroom house to construct 2 x 2 bedroom units is of negligible benefit. To the contrary, it:***
 - *does next to nothing to meet population growth*
 - *adds significantly to landfill*
 - *changes the neighbourhood character*
 - *frequently reduces existing tree canopy at the expense of the environment*
- ***Within the GRZ and NRZ areas, lots adjacent to already sub-divided lots should not be considered for subdivision without significant justification of the benefits to the FCC Housing Strategy and the neighbourhood***

3. Neighbourhood Character

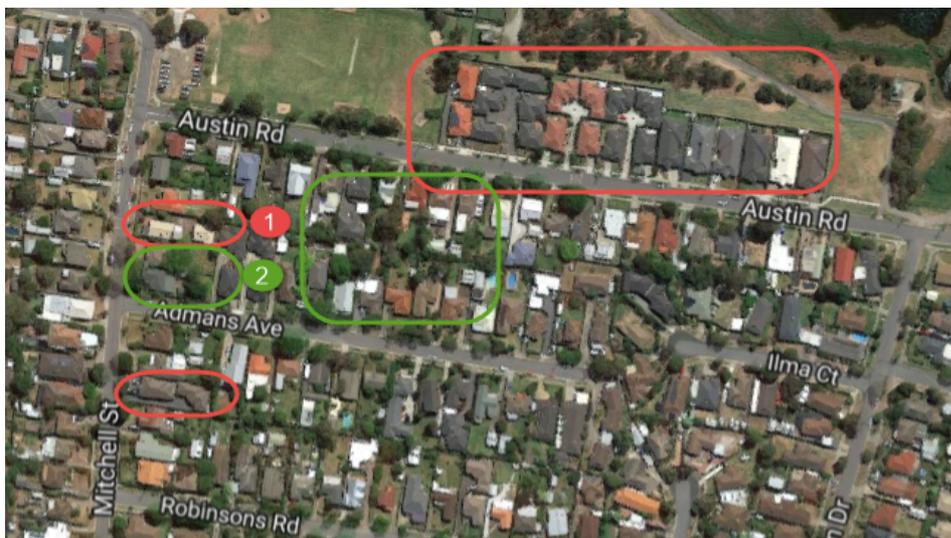
Neighbourhood character and environment will suffer without sufficient checks and balances.

For comparison, Chelsea lots were subdivided decades ago but the tree canopy of the area has never returned because there is insufficient open land to accommodate large trees and what there is has predominantly been taken up with driveways!



Chelsea - Google Maps Nov 2017

Within Seaford it can clearly be seen that the same thing is occurring whenever new development occurs. The developments circled in red occurred over multiple time periods but clearly they still have nowhere near the canopy of older neighbouring houses and never will as there is simply insufficient suitable open land available on the lot.



Seaford - Google Maps Nov 2017

Maintaining the tree canopy is important not just for neighbourhood character. Environmentally, they provide a heat sink in summer and environmental cooling, plus contribute to public good health.

To protect the neighbourhood character and environment of Seaford, SCC recommends:

- *Schedules attached to the relevant Zones need to define maximum building heights i.e. they should not be left blank to default to whatever the State Government may determine at a future date. This would retain some level of control at a local level and is within the current planning guidelines*
- *Minimum garden area needs to be at least 35% when the building height is greater than 8m irrespective of lot size (taller buildings mean more overshadowing and less chance for vegetation to re-establish)*
- *In areas where extensive subdivision has already occurred, consideration should be given to buying property to establish pocket parks thereby returning some degree of balance to the neighbourhood character and environment*

Note: The great suburban sprawl that was Melbourne's ideal for so many years expected the size of the lots to provide adequate private space without the need for the same level of public space evident in European cities. As infills become the norm, the overall planning of the suburbs must be revisited to correct this vision and public land must be acquired if we are to maintain our *most liveable* city reputation.

4. Nepean Highway Seaford

Page 55 – Section 10.5.3

The current development along this strip of Nepean Highway never sat well under NRZ guidelines, however neither is it suitable for the NEW RGZ which is proposing bulkier, taller buildings with no allowance for garden and a height of 13.5m.

Clause 32.07-8 for RGZ currently states *"If no maximum building height is specified in a schedule to this zone, the building height should not exceed 13.5 metres"*. The Reformed Residential Zones document dated March 2017 states that these heights can be varied *"Yes, Councils can set a mandatory limit that is at least 13.5 metres"*

Two contradictory guidelines - what would be the next step, raise the height even more to become the next Docklands or Gold Coast just because you would have sea views?!

This extremely sensitive area sandwiched between Kananook Creek and the Seaford Foreshore should not be subjected to the massive disturbance of deep foundations and the risk of exposing Acid Sulphate Soils just to support heights of 13.5m or greater. Neither should it lose most of its permeable ground, resulting in a massive increase to stormwater runoff into the creek and possible flooding closer to Frankston.

A recognised landscape 'rule of thumb' for suburban development for many jurisdictions worldwide where scenic views are available has been to keep buildings no higher than the tree line. This is definitely worth applying to the Nepean Highway and Kananook Creek strip.

SCC recommends:

- *Retaining as GRZ but with a schedule for an increased maximum height of 12 Metres (in line with DDO6) in the same way as you suggest applying current DDO6 setbacks to the schedule*
- *The Seaford Village Key Centre should have a separate zoning to protect the coastal village character of this small pocket (as with Beckwith Grove and Beach Grove, this should have the equivalent of NRZ heights)*

5. Minimal Change Areas

Page 57 - Section 10.7

Despite the statement “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”, Minimal Change Areas are still not recognizing the many overlays within the Seaford area.

The SBO Overlays shown below have clearly NOT been considered (and as any resident living in these areas can attest flooding occurs every time there are heavy rains).



DPCD - Grid Area 04

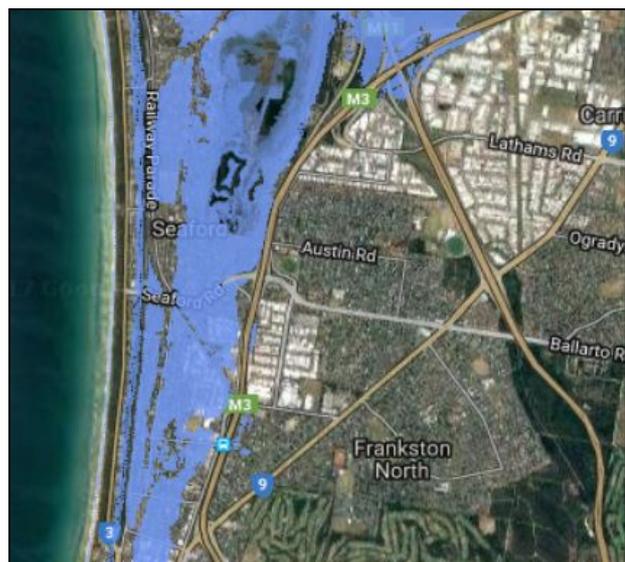


DPCD - Grid Area 01

The CSIRO has been measuring the sea level at Seaford for many years and for the past few has been recording it at 2mm/year. The risk of flooding in the low-lying areas of Seaford IS increasing. Morally and financially, FCC may be at risk if it does not inform existing and potential homeowners of this risk.

<http://www.theage.com.au/victoria/how-a-possible-twometre-sea-level-rise-would-flood-thousands-of-melbourne-homes-20170522-gwag1.html>

<http://coastalrisk.com.au/>



The Age - 2m high tide Seaford 2100

As the new NRZ now allows for multiple dwellings, you can have dwelling growth in anything designated NRZ whilst still affording some protection to the areas covered.

SCC recommends:

- *Any areas covered by SBO (and those lots in close proximity) must have increased permeable land requirements in their schedules to prevent an increased risk of flooding due to stormwater and help maintain the existing water table e.g. 40%*
- *Ideally they would be NRZ, especially around the Seaford Wetlands and Kananook Creek, but could be GRZ in other areas provided the greater height is offset by a smaller footprint on the land*
- *FCC should acknowledge the potential for sea-rise and future flooding across most of the Seaford area and reflect this in the zoning of this area*

6. Urban Planning

SCC suggests that FCC consider the following when creating their final schedules:

- The trend to use the garage as additional living space and/or storage of chattels rather than the family car is leading to congestion with on-street parking becoming the norm in many suburbs.
- Although FCC has no way to directly alter the State's 52-06 Parking Guidelines nor ensure the garage is used to park the car, it can enforce setbacks within the zone schedules that would allow sufficient land for off-street parking should the owner chose to use it.
- Finally, with the increased default heights now available, additional scheduled zones should be created, fixing maximum heights to create a transition and maintain the amenity of adjacent residential zones, e.g. RGZ should not be immediately next to NRZ and GRZ should not be immediately next to the Activity Centres.

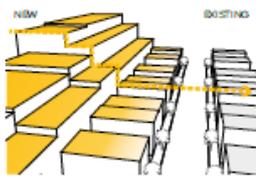
Note: Objective 1.3.3 of the Urban Design Guidelines is intended for large developments but is just as relevant to all residential areas where extreme height variances exist if any neighbourhood character is to be retained.

<https://www.planning.vic.gov.au/urban-design/urban-design-guidelines>

Objective 1.3.3 To large development sites maintain the amenity of adjacent residential uses

1.3.3a Create a transition from large development sites to adjacent residential neighbourhoods using scale, built form and uses.

→ **TIP** A transition can be achieved through the arrangement and size of new blocks and lots at the development site edge and the future built form, location of activities and street design.



Prepared by: Seaford Community Committee

Date: 26th November 2017

Other References:

Reformed Residential Zones March 2017

<https://www.planning.vic.gov.au/policy-and-strategy/planning-reform/reformed-zones-for-victoria/reformed-residential-zones>

Summary of the reformed residential zones			
	Neighbourhood Residential Zone (NRZ)	General Residential Zone (GRZ)	Residential Growth Zone (RGZ)
Maximum building height/number of storeys	Mandatory 9 metres / 2 storeys.	Mandatory 11 metres / 3 storeys.	Discretionary 13.5 metres.
Can these heights / number of storeys be varied in a schedule to the zone?	Yes. Councils can set a mandatory height limit greater than 9 metres / 2 storeys.	Yes. Councils can set a mandatory height limit greater than 11 metres / 3 storeys.	Yes. Councils can set a mandatory height limit that is at least 13.5 metres.
Is there a requirement for a minimum garden area?	Yes – mandatory.	Yes – mandatory.	No.

<p>The garden area requirement increases the amount of garden space that must be provided for new residential developments. New developments in the Neighbourhood Residential Zone and General Residential Zone will need to comply with the new garden area requirement. It is mandatory, and cannot be varied.</p> <p>The garden area requirement provides the opportunity for greater housing choice in Victoria’s neighbourhoods while protecting the open space character.</p>	Lot size	Minimum garden area
	400-500 square metres	25%
	501-650 square metres	30%
	Above 650 square metres	35%

A garden area does not include driveways, areas permanently set aside for car parking, or any building or roofed areas.

All areas that are normally associated with the use of a garden such as an entertaining area, lawn, garden beds, swimming pool or tennis court are included in the calculation of the minimum garden area.

Sustainable Melbourne

This University of Melbourne document makes for interesting reading and many of the ideas could be incorporated in Frankston’s Vision for the Future by implementing Smarter Planning:

www.sustainable.unimelb.edu.au/sites/default/files/docs/Melbourne_What-Next.pdf (15MB - you will need to copy the URL into browser)