



# Manningham Council Submission

Plan for Victoria & Draft Housing Targets  
(August 2024)



Interpreter service

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# 1 Introduction

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Council welcomes the opportunity to provide input into the new Plan for Victoria which will set a framework for the State's growth and development to 2050.

It is acknowledged that the focus of the Plan for Victoria framework is broader than just the planning system and there will be a need for many reforms to deliver on the Plan for Victoria and the ambitions of the draft Housing Targets.

In addition to Plan for Victoria, the State Government should reform legislation that impact on the development of land, including exempting Councils from the Windfall Gains Tax and reforms to the development contributions system.

The Plan for Victoria should ensure alignments with State policy frameworks, including *Victoria's Infrastructure Strategy 2021-2051*.

This submission is fundamentally based on the four consultation pillars put forward in the development of the Plan for Victoria with a focus on the issues of importance to Manningham. The submission also responds to the draft Housing Targets which have specified an additional 39,000 new homes in the municipality by 2051.

The four consultation pillars are:

- Affordable Housing and Choice
- Equity and Jobs
- Thriving and Liveable Suburbs and Towns
- Sustainable Environments and Climate Action

Through the planning and delivery of our broad range of services and functions, Council is aware of the importance of managing sustainable growth to provide for liveability in Manningham.

In this context, Council is cognisant of the challenges in the development and implementation of the Plan for Victoria. A standard of innovation will be required such as precinct planning, to optimise development and net community benefits outcomes particularly in high density locations. Council considers that a coordinated and collaborative approach is essential to achieve this vision across metropolitan Melbourne and the State.

Our commitment to the value of a coordinated regional approach to planning has been demonstrated through our membership of the Eastern Region Group of Councils (ERG) in metropolitan Melbourne. As a representative regional body, the ERG works on issues of common significance, with the goal of advocating on behalf of our communities. We have also provided input into the Plan for Victoria submission that has been prepared by the ERG.

Like many councils, Manningham faces significant challenges to long-term financial sustainability due to cost shifting, rate capping, rising costs, increasing population and rising community expectations. To address this, Council needs to engage with and seek support from other government levels and stakeholders to find sustainable solutions. Rate capping and funding gaps hinder our ability to meet increasing demands and provide essential services and infrastructure.

The State Government housing target of an additional 39,000 new homes in Manningham by 2051, will lead to a shortfall of over \$13 million per annum (based on today's dollars) for Council's operational budget. The income generated by these additional dwellings will not offset the

increased expenditure required to deliver the services and infrastructure needs of a significantly larger population.

This submission emphasises the need for the State Government to enable the provision of adequate funding mechanisms for councils to ensure that Manningham can deliver vital services and infrastructure effectively to a growing population, including:

- the establishment of ongoing partnership arrangements with councils to deliver a sufficient level of local infrastructure and services,
- the provision of alternative ongoing funding streams to enable a sufficient level of development of and maintenance of essential community infrastructure and to meet the increased demand for service provision;
- the provision of full and reliable funding streams to support any additional responsibilities that may be transferred to local government; and
- a review of the rate cap mechanism to ensure the ongoing financial sustainability of the sector.

Council is supportive of Plan for Victoria' objectives to increase the supply of housing but consider that there needs to be a more holistic and nuanced approach to address local land capability and capacity and housing needs.

Firstly, there is a disconnect between the ambition of the Housing Targets and the implications on the ground and the potential change in urban form implied by the targets. These targets have the potential to completely transform the settlement pattern of Manningham which is highly valued by the community.

Secondly, to release such ambitious housing targets without making any commitment to the infrastructure required to support such exceptional growth is concerning. The Manningham community has a right to such fundamentals as public open space, adequate drainage and sewage systems, education facilities, health services and transport networks. There is no analysis of this and no corresponding budget allocation over future years from the state. Other challenges facing Manningham is the lack of land supply that would be required to provide the additional community services and facilities for this projected population increase.

Whilst Manningham supports the principles underpinning the Plan for Victoria, it's success will be based on the State Government consulting and working collaboratively with local government. This approach will ensure that the framework plan is sustainable, deliverable, and equitable for the whole our community and for all Victorians.

## 1.1 Context

Manningham is in Melbourne's eastern suburbs covering an area of 114km<sup>2</sup>. It stretches from Bulleen about 12km from Melbourne's Central Business District (CBD) to Wonga Park.

The Wurundjeri-woi-wurrung are the Traditional Owners of the lands and waterways known today as Manningham. Mullum Mullum Creek divides the municipality into two distinct topographic areas. Land to the west is highly urbanised, while land to the east is primarily semi-rural in character.

Between these two typologies is a low-density residential buffer area which makes a valuable contribution to the settlement pattern of Manningham. A large section of the eastern half of the municipality is within a designated 'Green Wedge' that has minimal development opportunities and features significant ecological environments.

Urban areas include the suburbs of Bulleen, Doncaster, Doncaster East, Templestowe and Templestowe Lower. The non-urban areas include a large tract of the Green Wedge, and are used mainly for rural-residential living, conservation and small-scale agriculture (viticulture and grazing).

This settlement pattern of two distinct housing typologies results in restricted development opportunities in the eastern parts of the municipality. The suburbs to the west of the Mullum Mullum Creek have accommodated most of the housing growth in the municipality to date. Council is concerned that accommodating 39,000 new dwellings will result in further concentrated change in the western part of the municipality which may be required to do the ‘heavy lifting’ to meet the targets, due to Green Wedge, topographical and infrastructure constraints in the eastern part of the municipality.

## 2 Draft Housing Targets

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The State Government’s draft housing targets released on 16 June 2024, will play a significant role in the Plan for Victoria. In Manningham, the State Government has set a draft target of 39,000 new homes by 2051. This represents a 76% increase over the current housing stock, which equates to 1,300 new dwellings per annum over 30 years.

Over many years, Manningham Council has accepted growth, planned for growth and managed growth in a balanced and incremental way – in consultation with the local community.

Manningham has successfully facilitated housing growth and diversity in accordance with State Government policy directions and in accordance with the existing *Manningham Residential Strategy (2012)*. The introduction of the *Doncaster Hill Strategy (2002, revised 2004)* provides for the highest density development in the 58ha area forming part of Doncaster Hill Major Activity Centre which surrounds and includes Westfield Doncaster. The Pines Shopping Centre is the other Major Activity Centre in Manningham after Doncaster Hill and is also surrounded by substantial higher density dwellings. In addition, the previous and current *Manningham Residential Strategies (2002 and 2012 respectively)* have resulted in increased residential densities and apartment development around our activity centres and along main roads, near public transport and employment opportunities.

A review of permit data in relation to the objectives of the 2012 *Manningham Residential Strategy* indicates significant success in directing growth and housing diversification as follows:

- The Strategy has successfully guided growth to activity centres and main roads. More than 50% housing growth has occurred along main roads and in and around activity centres – (these are identified in the Strategy as substantial change areas and include Doncaster Hill Activity Centre).
- There has been very limited change in low density areas as per the Strategy’s strategic objectives.
- New apartments have helped enable and facilitate significant downsizing activity into our activity centres – this is evidenced by high proportions of owner occupiers in our Activity Centres and high proportions of 3-bedroom apartments.
- In 2023, the total housing stock in and around activity centres comprised 20% of municipal housing. The municipality is therefore close to achieving its goal of 24% of housing stock (a goal within the *Manningham Residential Strategy 2012*), in and around activity centres by 2030.
- Manningham’s housing stock has diversified since 2011 when apartments and townhouses comprised 18% of our housing stock. In 2021, apartments and townhouses comprised over 28% of municipal housing.

Manningham’s current *Residential Strategy* was prepared in 2012. It was informed by the *Neighbourhood Character Guidelines*, also prepared in 2012. (Refer to Attachment 1 for a map showing Manningham’s Residential Character Areas).

*Preparation of a new Manningham Residential Strategy*

Council is currently preparing a new residential strategy that will guide housing development in Manningham up to 2036. An extensive community consultation program was undertaken in early 2024 as part of seeking feedback on a *Residential Discussion Paper, April 2024* (Discussion Paper). The *Discussion Paper* was informed by a detailed demand and capacity analysis (based on *Victoria In Future 2023* data) and an existing neighbourhood character assessment. This community consultation was undertaken prior to the release of the draft Housing Targets.

More than 150 surveys were completed during the recent consultation on the *Discussion Paper*. The community strongly emphasised the need for housing growth to be balanced against the retention of valued neighbourhood amenity including protecting environmental and landscape assets and features. In response to questions on housing choice, our community indicated the need for more housing diversity to suit the needs of downsizers, young people, and diverse cultural groups including support for innovative housing models including 'co-housing' and 'ageing in place' models. There was also acknowledgement that housing affordability is a major barrier for people wanting to live and rent in Manningham.

It is important to note that council is not currently able to comment on Manningham's existing or future capacity to absorb housing growth. This detailed capacity analysis is currently being undertaken as a component of the technical work for a new *Residential Strategy*. This capacity analysis will then inform the *Manningham Residential Framework Plan* and address different development scenarios and the requisite policy settings needed to absorb housing growth and respond to the proposed Housing Targets.

It is considered imperative that council has an opportunity to present this capacity and land capability information to the state government before the Housing Targets are finalised.

The Plan for Victoria needs to be planned in an integrated and sustainable manner, with the principle of liveability underpinning the policy framework. In this regard, the approach to determining housing targets needs to consider the interplay of various factors, including land capacity and land capability and the various types of housing typologies required to meet the varied needs of the population.

While Council supports the focus on housing growth, there also needs to be an emphasis on qualitative housing outcomes rather than simply a quantitative target driven approach.

It is considered that the draft Housing Targets are very ambitious both in numbers and timeframe, in comparison with the demand projections identified in the recently exhibited Manningham *Residential Discussion Paper*. Officers have worked with official government population projections *Victoria in Future* forecasts (VIF) which is based on 8,200 new dwellings by 2036.

It is important to note that the Housing Targets are not based on VIF projections as they are intended to provide additional housing over and above projected demand, with the aim of driving affordability through additional supply.

Our understanding is that a 15-year timeframe (up to 2036) has been used as an accepted industry standard in the preparation of several recent residential strategies. Whilst the draft Housing Targets adopt a 27-year timeframe (up to 2051) for the delivery of new dwellings, it is considered that there will be difficulties in forecasting housing demands and needs over this timeframe.

The draft Housing Targets represent a major shift from the figure informing the preparation of Manningham's Residential Discussion Paper and the amount of development that Council was initially anticipating. This will have significant implications for how Council moves forward with future community consultation on the *Residential Strategy*. It also has the potential to undermine the community's confidence in the process to date with the continual shifting of the strategic planning goal posts by the State.

There is also concern that the number's anticipated in the draft Housing Targets will have a substantial impact on the unique identity of Manningham's neighbourhood character precincts. To this end, there appears to be a disconnect between the ambition of the Housing Targets and the implications on the ground and the potential change in urban form implied by the targets.

Understanding Manningham's capability to absorb additional housing growth will be a key driver in setting realistic and manageable housing targets. There are a range of physical and environmental attributes unique to Manningham that must be considered as part of understanding capacity and before a final housing target can be established. More specifically, the housing targets need to also consider the projected demand for new or improved infrastructure, such as roads, drains, footpaths, public open space, schools, community and recreational facilities and employment precincts.

New dwellings must also be respectful of the environmental and neighbourhood character qualities of an area. An analysis of the existing neighbourhood character of Manningham's residential areas was undertaken to inform the *Residential Discussion Paper*. The Manningham Neighbourhood Character Study (2024) identified the important attributes distinguishing the characteristics of 9 distinct precincts across the municipality. The next phase of work as part of developing the new Residential Strategy will be to identify preferred neighbourhood character precincts. This will form the basis for the new *Residential Framework Plan* to guide how we manage housing growth and change.

There is also a need to investigate opportunities at the state and local level to introduce more innovative planning policy and/or legislative changes that support emerging housing models and outcomes that focus on moderate income households. These may include affordable "Build to Rent" and "Rent to Buy" housing for key workers and shared equity schemes. Council notes the introduction of the Vacant Residential Land Tax commencing on 1 January 2025 as an important incentive to providing more homes and options for Victorians.

#### *Planning limitations*

Whilst the planning system can provide the policy setting for development, it cannot compel land to be developed. There are many external factors that developers considered when developing land, including taxation, interest rates, finance, material and labour costs and availability and market interest. Council cannot compel the lodgement of planning permit applications for residential development and likewise cannot force developers to act upon active planning permits.

The last decade of high-density housing growth in Manningham has slowed down with very limited new construction in the pipeline for the foreseeable future. Achieving the targets will be a challenge without a major change in housing delivery. In this context, information on how the State Government proposes to re-ignite established area housing supply is welcomed.

Table 1 shows the number of dwellings approved as part of multi-unit/mixed-use developments (i.e. 2 or more dwellings between 2019 – 2024). It demonstrates how dwelling approvals have dropped significantly by 593 dwellings, a 69% reduction in approvals between 2019 to 2024. This drop in approvals is not because of Council inaction but is reflective of the number of applications being lodged with Council during this period.

*Table 1: Multi-unit dwelling approvals Manningham 2019 - 2024*

2019-2020	849 dwellings
2020-2021	771 dwellings
2021-2022	577 dwellings

2022-2023	676 dwellings
2023-2024	256 dwellings

Source: Manningham P&R data dwellings approved as part of multi-unit/mixed use developments 2019 - 2024

As Council progresses the preparation of the new *Manningham Residential Strategy*, Council intends to work closely with DTP in sharing its findings of its capacity analysis, its diversity and affordability objectives and the development of the *Residential Framework Plan*.

Council looks forward to working collaboratively with DTP in determining housing targets that balance growth whilst also considering the numerous other factors that impact capacity and development potential.

*Recommendations relating to Draft Housing Targets:*

**Ensure the Housing Targets achieve an appropriate balance between increasing housing growth in areas serviced by infrastructure and protecting areas of environmental and visual significance.**

**Explore legislative and policy settings to remove constraints on the development sector and mobilise the construction industry in delivering housing outcomes.**

**Investigate opportunities to introduce planning policy and legislative changes that support emerging housing models and outcomes that focus on moderate income households, including:**

- co-housing,
- affordable “Build to Rent” and “Rent to Buy” housing for key workers and shared equity schemes.

**Ensure that the housing targets include an assessment of land capacity and capability and housing diversity objectives.**

**Resolve funding of critical infrastructure (including community and social infrastructure), needed to support housing growth, acknowledging local government is unable to fund these alone.**



## 3 Plan Victoria Consultation Pillars

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This section of the submission provides Council's response to each of the four consultation pillars.

### 3.1 Pillar 1: Housing affordability and choice

This section needs to be read in conjunction with *Section 2: Draft Housing Targets* that discusses housing needs more broadly and the need for more diverse housing choices. Community feedback from council's recent consultation, reflects an increased demand for smaller housing, primarily in the form of townhouses and apartments with more communal spaces for improved social connection. There is also support for innovative housing including 'co-housing' and 'ageing in place' models. Providing a more diverse housing typology and the delivery of different housing models may also have implications of providing for housing affordability throughout Manningham.

#### 3.1.1 Social and Affordable Housing

One of the highest priorities for the Plan for Victoria is to increase the supply of social and affordable housing across Victoria, to create a diverse and inclusive society. This housing needs to be safe, secure and appropriate so people can feel valued and contribute to daily life, which provides broader social and economic benefits for the community.

Despite the *Planning and Environment Act 1987* having an objective to facilitate affordable housing, there is no mechanism in the planning system to facilitate this outcome. The Plan for Victoria presents a key opportunity to establish a consistent and transparent State-wide approach to affordable housing provision through the introduction of inclusionary zoning. In 2023, Council endorsed the *Manningham Affordable Housing Policy* to provide the directions and measure council will undertake to facilitate an increase in the supply of affordable housing in the municipality.

The rate of social housing provision in Manningham is far lower than the average for Greater Melbourne (0.6% of total dwellings compared with 2.6% in Greater Melbourne). Manningham also has the lowest supply of social housing in the Eastern region.

In 2020/21 the Victorian Budget announced the Big Housing Build (BHB) to increase housing supply throughout metropolitan and regional Victoria. The investment will deliver 9,300 new social housing homes, and a further 2,900 new affordable and low-cost homes. Manningham has several properties that are owned by the State Government. Manningham needs to work with the State Government, particularly Homes Victoria, to investigate redeveloping some of these sites to increase the supply of affordable housing in the municipality.

#### *Pillar 1 Recommendations:*

**Introduce inclusionary zoning in the Victoria Planning Provisions to provide a consistent and transparent mechanism to facilitate the provision of affordable housing across Victoria.**

**Undertake an audit of State-owned land in Manningham to identify sites for affordable housing.**

## 3.2 Pillar 2: Equity and jobs

### 3.2.1 Integrated Transport and the Suburban Rail Loop (SRL)

Transport systems shape cities, drive local economies and strongly influence where people choose to live and work in Manningham. Manningham's Transport Vision is a well-integrated transport system that prioritises accessibility and sustainability. Diversity in available transport options is also key to promoting mode-shift towards sustainable transport options including public and active transport. This can help to reduce emissions, air pollution and traffic congestion.

The provision of a sustainable, accessible and integrated transport system is critical if Victoria is to have a prosperous economy and attract investment. Manningham is the only metropolitan Melbourne municipality without a train or tram line, relying solely on the bus network. This is a major inhibitor in attracting larger employers and puts pressure on our bus network. It is necessary that the Plan for Victoria improves Manningham's public transport system and prioritises bus network improvements, to enable our local economy to expand and prosper as the population grows.

In particular, *Infrastructure Victoria's Bus Reform Community Research (March 2023)* found that:

- Highlighting the lack of emotional connection to buses, just a quarter of respondents (24%) agreed that buses are for 'people like them'. In Manningham LGA where buses are the only mode of public transport available, agreement is higher –40% agreed buses are for 'people like them'.
- One in four respondents (25%) reported that they would like to get rid of their car but don't feel there is a viable alternative, indicating some underlying desire for public transport alternatives.
- Manningham LGA (only Melbourne municipality without a train or tram line) (98 respondents):
  - All respondents residing in Manningham travel by car/motorcycle at least weekly (100%) and were more likely than average to own a car (93%) and hold a valid drivers license (99%)
  - More likely than average to use a bus more often than once a year (59% vs. 44% of all respondents)
  - More likely than average to agree that buses are for people like them (40% vs. 24% of all respondents) however, they were less likely than average to agree they feel positively towards public transport (46% agree vs. 57% of all respondents)

In addition, *Infrastructure Victoria's December 2023 report 'Fast Frequent and Fair, how buses can better connect Melbourne'* reported that:

- Without intervention, 84% of bus routes services will become slower by 2026.
- The metropolitan bus network currently carries the lowest number of passengers of all forms of public transport, despite buses offering over 5 times more scheduled service kilometres than the city's tram or train networks.
- Melbourne's buses cost over \$800 million to operate each year. They make up 30% of funding for metropolitan public transport operations and account for approximately 25% of overall public transport patronage.

Council's key transport advocacy priority is the need for improved bus frequency and services, in the form of Bus Rapid Transport (BRT). In summary:

- The Doncaster Road corridor Bus Rapid Transit (BRT) proposal between Mitcham Station and Doncaster Park & Ride is Council's number one public transport priority.

- BRT is a bus-based public transport system, combining the recognised features of rail with the flexibility and cost advantages of road transport, and has been specially recommended by Infrastructure Victoria as a method of improving the bus network in Melbourne.
- BRT can provide Manningham residents a direct mass transit public transport connection to the CBD, at a cost effective and shorter timeframe, than rail.

In addition to and/or as part of a wider BRT network, Manningham is also advocating for a new bus route to mimic the future SRL alignment – to improve east-west connections and start building patronage for the future rail link. The proposed initial route is between Monash and La Trobe Universities via Deakin University, Box Hill Station, Doncaster, Bulleen, and Heidelberg.

The ‘Eastern Express Busway’ is a proposed BRT link between the CBD and Doncaster Park & Ride, which will be provided as part of the North East Link Project (NELP). Manningham has advocated tirelessly for the Doncaster Park & Ride site to be upgraded as a mixed-use transit-oriented development.

To redevelop the Doncaster Park & Ride site ‘like-for-like’ (as a carpark and bus interchange only - as NELP proposes to) is a significant missed opportunity to address growing population and transport demand, and to increase local economic opportunities along a high frequency bus corridor. Manningham urges Plan Victoria to ensure meaningful consideration is given to key opportunities identified by local Councils, who have the benefit of local knowledge and expertise.

Uncertainty associated with the SRL project significantly influences our capacity to plan for the future - including identifying housing opportunities and associated services. The Doncaster Hill Major Activity Centre enables the highest density of development in Manningham. Confirming a station location within Doncaster will provide Council with greater certainty on how it should plan for increased housing density within Doncaster Hill and the broader area. If it does go ahead, stage 2 of the SRL project (SRL ‘North’) is not expected to commence until *at least* 2030, with completion around 2053 or later. This leaves Manningham as the only metropolitan Melbourne municipality without a train line for at least another 30 years, highlighting the urgency of bus network improvements including BRT in the short to medium term.

There is an opportunity for the State Government to commit to complementary investment programs to support the development of the corridor and connectivity to the future SRL. This should include BRT links and a high frequency bus route to mimic the future SRL North alignment. Additionally, provision of increased development opportunities along this corridor to support housing and employment investment will be key.

### **3.2.2 Diversifying the Employment Sector**

Manningham faces several pressures and challenges to generate and service a meaningful employment sector. The absence of fixed rail in Manningham is at the core of facilitating a diverse and sustainable employment base and economy. These issues will be exacerbated as population pressures place a strain on limited resources in and around activity centres and on the ability to attract new employers to create a diversified employment base. Manningham has a total of 10 major and 10 neighbourhood activity centres which act as employment zones for residents. The continued growth of the centres is paramount to the viability of the local economy. Manningham is currently an exporter of talent due to a lack of local opportunities. Resident escape expenditure for the 2024/25 financial year (\$1.96B) outstripped residents spending locally (\$1.21B) and funds introduced to the economy from out of municipality (\$1.449B). A lack of large employers has contributed significantly to this significant loss to the local economy.

It is essential that new residents view Manningham as a place which offers a range of employment types. This will only be achieved through the ability to diversify the local job market, attracting large

companies and new employers to Manningham and provide employment pathways to the growing population.

The following have been identified as key issues facing Manningham's employment sector.

#### *Absence of corporate headquarters*

Manningham's economy consists of 80% home-based businesses. There is a lack of corporate headquarters, tertiary institutions, significant health providers or government departments within the municipality. The absence of fixed rail significantly reduces the attractiveness and incentive for larger employers to locate in Manningham. As an example of the nexus between attracting corporate headquarters and proximity to fixed rail transport, in 2018 Target Australia began residency of its new 8 storey national headquarters in Williams Landing, part of Melbourne's western growth corridor. A workforce of 850 were added to the economic prosperity of the Wyndham economy with a 28-minute express service to Southern Cross Station an attractor for those commuting.

The introduction of rail is essential in opening economic prosperity to Manningham and creating opportunities for the local community. Without this, Manningham will remain a provider of home based and mall owner-operated businesses which exports 54% of workers to other areas as opposed to being a viable option for attracting new industries which offer a range of employment opportunities.

#### *Targeting growth in activity centres*

Manningham has a total of 20 activity centres which act as employment zones for residents. As discussed, with the municipality lacking large employers, the continued growth of the centres is paramount to the viability of the local economy. Increased levels of housing and associated growth in population will be focusing on these centres as areas to secure meaningful employment. This will place significant stress on Council and the private sector to identify opportunities as new residents look for close to home employment options. Additionally, Council will be required to allocate significant new budgets to develop activity centre infrastructure in line with increased demand and changing needs of the introduced population. It is imperative that federal or state government support for development of activity centres matches or exceeds the demands placed by new resident populations.

#### *Diversifying employment types and its impact on education*

Factors noted such as the absence of fixed rail to Manningham limit attraction of corporations, health and government departments which have further impacts on the employment and educational sectors. Firstly, there is an inability to offer new residents options beyond blue collar, primarily hospitality-based employment and no defined career paths. This expectation of higher employment options for new residents will only increase the pressure placed on Council to attract significant employers.

Second, large employers (private or public) provide career pathways including transition from school to work. Increased populations will look for this opportunity and if not found in Manningham will take their yet to be developed skillset and expertise outside of the municipality and, therefore, not contribute to the local community or the growth of the economy.

It is essential that new residents view Manningham as a place which offers a range of employment types. This will only be achieved through the ability to diversify the local job market and provide employment pathways to the growing population.

#### *Bulleen Employment precinct*

A key future employment opportunity is the Bulleen Employment precinct, formerly occupied by the Bulleen Industrial precinct, which was acquired by the State to facilitate the North East Link project. The employment opportunities of this area are identified in the Minister's Assessment of Environmental Effects of the North East Link (November 2019) recommendation 7A states:

*'That the Manningham Road Interchange design should maximise the return of residual land for employment, including industrial land uses (IAC Recommendation 7a).'*

The employment potential around the Manningham Road interchange and extending northwards in the vicinity of the Heide Museum of Modern Art and Sonoco site at 17 Templestowe Road, Bulleen are affirmed in the State Government's *Birrarung-Bolin Framework (Framework Plan)*, approved by the Minister for Planning in January 2024.

To assist, Council considers that an exciting opportunity exists to create an economic hub in this precinct. Future planning of this area can capitalise on the proximity to the Heidelberg activity centre and health precinct, the NEL project and associated public realm enhancements.

Consistent with the *Birrarung Bolin Framework Plan* and *Burndap Birrarung Burndap Umarkoo* (Yarra Strategic Plan), this precinct can provide contemporary, and emerging employment uses, in addition to creative industries, cultural and community uses to reflect the cultural and environmental attributes of the nearby Yarra River and its environs. Associated residential development may occur within Bulleen in the vicinity of the Yarra Valley Country Club and Sonoco site. Designation of this new economic precinct and discussion of the opportunities it can provide should be clearly communicated in the new Plan Victoria.

*Pillar 2 Recommendations:*

**Fund and deliver improved bus services in Manningham including Doncaster Road corridor Bus Rapid Transit (BRT)**

**Confirm the SRL station location as a high priority to enable planning for greater housing density.**

**Support a rapid bus service to mimic the SRL alignment from Monash to Latrobe universities.**

**Create a new economic hub around the Manningham Road interchange following the completion of the North East Link project to provide contemporary, and emerging employment use sensitive to the environmental and cultural attributes of the Yarra River and its environs.**

## **3.3 Pillar 3: Liveable and Thriving Neighbourhoods**

### **3.3.1 Liveability**

#### *Neighbourhood Activity Centres*

Landscape character and particularly tree canopy cover are key determinants of neighbourhood character and are highly valued by the community. Importantly, a consistent message from our community is the value our parks, trees, open spaces, and the natural environment.

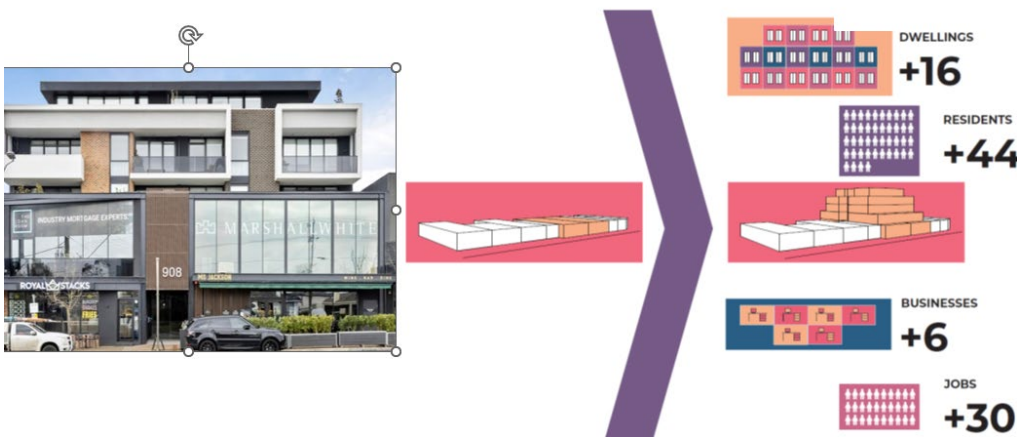
The 20-minute neighbourhood concept in Plan Melbourne defines the key elements of local living. Manningham's *Liveable City Strategy 2040* (2022) supports the 20-minute neighbourhood principle. Key directions in our Strategy that are aligned with the Plan Victoria are:

- Diverse housing opportunities and distinct communities

- Vibrant activity centres
- Thriving employment
- Sustainable Transport and travel mode choices
- Greening our city
- Building social and cultural connections

To ensure the liveability of evolving neighbourhood activity centres and new areas whether it be for housing or employment opportunities, the *Plan for Victoria* needs to facilitate living locally by strengthening the co-location of services, housing, and infrastructure in line with the principles of the 20-minute neighbourhood. This could be achieved by identifying specific precincts where partnerships between state and local authorities could be established to support future development and sustainable local living.

Manningham’s Neighbourhood Activity Centres are experiencing some growth in mid-rise development. In particular, examples of this type of multi storey mixed use development is evident at Jackson Court. This includes a five-storey commercial expansion with a supermarket and an apartment complex. A further development fronting Doncaster Road consists of restaurants and retail at ground floor, commercial office space at the first floor, basement carparking and residential dwellings above.



*Jackson Court redevelopment – Mitchell Street, Doncaster 2024*

### *Public Open Space*

Manningham is highly valued for its green and leafy neighbourhoods and range of natural assets, with public open space covering nearly 18% of the municipality. The natural environment within river and creek environs, Green Wedge areas, as well as landscaping within streets and private properties are a distinguishing feature of Manningham and play an integral part of the municipality’s identity and quality of life for residents.

Despite this, there are gaps in Manningham’s open space network and pockets in the western section of the municipality where access to public open space is limited. There is also difficulty in accessing some of the regional open spaces and river environments from many of the residential areas in Manningham and local open spaces are not well linked. The proposed housing targets and corresponding population growth and dwelling densities will place increased pressure on the existing open space network.

Parks and open spaces are essential infrastructure in communities and there is a need to ensure the city improves accessibility to a diversity of green open spaces as the population grows and the municipality redevelops and intensifies to accommodate this growth. The 20-minute neighbourhood concept considers that parks and recreation are a “daily need” which should be available within convenient proximity to residential dwellings.

They are a key component of liveability and Manningham’s objective is for the community to have access to a diverse range of accessible and green open spaces within easy walking or cycling distance of all homes, as well as leafy green streets to encourage active travel. Council’s open space network should also be physically connected through green links to create attractive recreational connections and opportunities. A failure to provide or improve open spaces in Manningham will lead us to fall behind in meeting the gaps in open space provision and provide for the projected housing growth.

The need to provide diverse and accessible open spaces needs to be recognised in the *Plan for Victoria*.

### **3.3.2 Local Infrastructure to Support Growth**

The construction of an additional 39,000 homes and an increase in population to 105,000 will place considerable strain on existing infrastructure. The financial costs associated with upgrading drainage networks, footpaths, roadways, traffic and waste management systems are substantial but necessary to support the increased demand. Physical construction impacts will include potential flooding issues, increased wear on roadways, and the need for new footpaths. Effective traffic management and public transport enhancements will be critical to mitigating congestion and ensuring smooth operation of the expanded infrastructure. Planning and investment from the State Government in these areas will be essential to accommodate the growth and maintain a high quality of life for residents.

*Victoria’s Infrastructure Strategy 2021-2051* is a 30-year strategy that provides a practical roadmap for action over the next 30 years across a broad range of public policy areas including housing, energy, transport and social infrastructure. This strategy aims to help Victoria address existing infrastructure pressures and be prepared for the future.

There is a need to ensure alignment between *Victoria’s Infrastructure Strategy 2021-2051* and *Plan for Victoria*. There is a strong case for the need of better integration of land use and infrastructure planning in established areas and to plan and deliver infrastructure in established suburbs for growing communities. Infrastructure agencies across government need to share land use and infrastructure plans. This will allow integration of planning, reduce duplication and support investment certainty.

Expanding residential development to include an additional 39,000 homes by 2051, with a resulting population increase, will have significant financial and physical impacts on the management and maintenance of existing and future infrastructure, such as:

- drainage networks, footpaths, roadways, and traffic congestion.
- arts and cultural facilities
- human services such as Maternal Child Health services
- recreation and sporting facilities
- waste management.

The following section provides a high level overview in considering the anticipated impacts of the projected housing targets on a range of Council and State government infrastructure and services.

#### *Drainage Network and Flooding:*

The existing drainage network which includes approx. 1,047,561 lin.m of drainage pipes, 36,894lin.m of open table drains and approx. 50,000 pits, will not be able to handle the increased volume of runoff from additional homes. This can lead to potential flooding issues if the drainage network and stormwater system is not upgraded to accommodate the increased load. Installation, availability and capacity of retention basins, stormwater management systems, and improved drainage design will be crucial.

The existing drainage infrastructure will require significant upgrades to handle the increased runoff and prevent further flooding. This may include expanding capacity where possible, repairing existing systems, and installing new drainage infrastructure. Costs will vary based on the current state of the infrastructure and the extent of required upgrades.

#### *Footpaths and Pedestrian Access:*

With the construction of new homes, additional footpaths will be necessary. The cost of constructing new footpaths and maintaining existing ones will increase. This includes expenses for materials, labour, and ongoing upkeep.

The construction of additional homes will necessitate the development of new footpaths and the maintenance of existing ones. Ensuring that footpaths are accessible, safe, and well-maintained is essential for pedestrian mobility and safety.

#### *Roadways:*

The road network will need to be expanded and improved to accommodate increased traffic. This could involve full road reconstruction, resurfacing, widening/narrowing existing roads, building new roads, and adding traffic management features for both vehicles and people. The financial burden includes both construction and long-term maintenance.

Increased traffic will accelerate wear and tear on roadways, necessitating more frequent repairs and maintenance. This would include resurfacing roads, fixing potholes, and reinforcing road structures.

#### *Traffic Congestion and Traffic Management:*

The addition of 39,000 homes, an average 2.7 persons per dwelling, no train station, already high car ownership levels, could see the number of projected vehicles in Manningham also increase by 105,300 vehicles. This increase can lead to congestion on existing roadways, affecting travel times and overall road safety and efficiency. Areas near new residential developments may experience particularly severe congestion.

Increased congestion can impact traffic flow, leading to longer commute times and potential safety concerns. Implementing traffic management solutions such as improved signal systems, better road design, and traffic calming measures will be necessary to mitigate these effects.

To manage increased traffic volumes, additional investments in traffic management systems (e.g., signals, signage, and monitoring systems) will also be required by the Department of Transport & Planning. Enhancements to support public transport infrastructure would also be necessary to reduce the dependency on private vehicles and alleviate road congestion where possible. This



could involve expanding bus routes, increasing service frequency, and improving connectivity between residential areas and key destinations. This is addressed in more detail in Section 3.2.1.

While the initial costs of upgrading civil infrastructure are high, the increased population can also drive economic growth through higher demand for local services and businesses. However, if delivery of infrastructure improvements lag behind development, it could lead to decreased quality of life and economic inefficiencies. Council does not have the financial capacity to deliver these on our own and financial support will be required in order to support the proposed growth. This is further addressed under Section 3.2.2.

#### *Waste Management:*

The proposed expansion of 39,000 houses within Manningham is set to significantly influence waste management and litter services, particularly in response to the heightened demand for sporting facilities, parks, and activity centres. Waste management is a critical Council function which is already strained by rising landfill levies and illegal dumping activities.

While the increase in higher density housing may not directly affect residential waste collection—since most high-density properties are not serviced by Council—it will have a profound impact on public waste services and infrastructure. Additionally, it is likely to exacerbate instances of illegal dumping, as properties who do not have Council waste services are ineligible for hard waste collection.

To address the increased demand for litter management, additional resources will be essential, including funding, equipment, infrastructure, educational initiatives, enforcement measures, and staffing. Given that current waste and litter services are already operating at full capacity, accommodating an additional 39,000 homes will necessitate substantial strategic investment and resource allocation.

#### *Arts and Cultural facilities:*

The projected housing growth and Housing Targets will also have a significant impact on the need for and provision of arts and cultural facilities as follows:

In much the same way as an increase in population is anticipated to require additional sporting and active recreation facilities, it should be anticipated that additional arts and cultural facilities will be needed to meet increased demand. Such facilities include government run services such as public galleries, museums, arts centres, and live performance venues as well as community run facilities like neighbourhood houses, and private organisations, be they galleries, dance studios, contemporary music venues or boutique art studios. Ongoing, these need to be funded to program an increased suite of events, exhibitions, workshops, productions and more, particularly to ensure that these are culturally relevant and respond to any changes in the demographic profile of Manningham.

This will require an increase in Council's operational budgets but also in grant funding for community and privately run programs. Given the proximity of Manningham to Whitehorse and Maroondah, both of which have large performing arts centres, it is not anticipated that the increased population will drive immediate need for such a venue in Manningham, so other opportunities for performing arts may be prioritised.

In particular, it is expected that there will be an increased desire for more contemporary live music venues in activity centres, such as pubs and clubs, which will support growth of the night time economy. Events, festivals and performances within public spaces in activity centres can also support this growth, and while trader groups may support such activities, it is likely that Council would play a significant role in supporting these, either through grants and sponsorship of events, or by actively programming and delivering them. Just as employment hubs or large-scale

employers retain economic activity within the municipality, a higher density of artistic and cultural venues and opportunities to engage in the arts is key to ensuring Manningham's liveability and mean residents are more likely to stay within the municipality for entertainment and cultural experiences.

As new community infrastructure is introduced and existing assets are upgraded, investment in public art should increase, and this will require additional resourcing to commission and maintain. This can be supported by the developer contribution scheme as new residential and commercial properties are built.

The Birrarung-Bolin precinct presents a unique opportunity for arts and cultural investment. The *Birrarung-Bolin Framework Plan* identifies this area for growth and renewal, including the major interchange for the future North East Link tunnels at Manningham Road, Bulleen. Given the significance of the site to Wurundjeri Woi-wurrung, Council supports the inclusion of cultural heritage activities which may involve interpretive signage, environmental and cultural events, and public art commissions. Public performance and gathering sites should also be considered for inclusion in any development of the site. This precinct may also present opportunities for investment in arts and cultural infrastructure that is currently missing in Manningham, such as music rehearsal studios, leasable artist studios, recording studios, games centres and artist maker spaces where artists and designers can access specialised machinery and workshop space. Refer to Section 3.2.2 for further discussion also in relation to employment opportunities within this precinct.

#### *Maternal Child Health Services:*

Currently planning for Maternal Child Health services in Manningham is based on the previous 5 years of data. In Manningham, there is generally between 950-1000 new babies born in Manningham per year.

The Maternal Child Health services generally see children over a 4-year period. This equates to a population of close to 4000 children (from birth to 4 years of age) seeking services at any one time.

If the projected number of additional homes to be built in Manningham reaches 39,000, this equates to a potential 80% increase in families accessing the service with a possible increase of up to 7200 children in the service, and 1800 new babies born per year.

Currently all Manningham's maternal child health services are at capacity and would need to more than double the number of services to cater for the increased population growth.

#### *Recreation, Sporting and Community Facilities:*

The housing targets and the potential corresponding increase in population will have a significant social and community impact and will result in demand for significant upgrades to local infrastructure including:

- Playing fields and courts
- Indoor sport and recreation facilities
- Informal recreation facilities and spaces
- Community hubs with meeting spaces and library services
- Schools and early years infrastructure

The following is a case study on the demand on Soccer Facilities, which is indicative of an exponential growth in demand for local infrastructure should the housing targets be realised.

Using the approved industry ratio, the following has been calculated to determine the required facility provision based on an addition 105,000 residents:

Sport	Ratio Calculation	Current Facilities	Required Facilities in 2036	Additional Facility Requirement	Required Facilities in 2051	Additional Facility Requirement
Soccer	1 pitch per 5,000 residents	25.5	29.6	2.1 (noting future conversion at Anderson Park)	47.84	22.34 (rounded down to 22)

Overall an additional 22 pitches would be required to meet demand based on projected population growth. Given land for development is very limited in Manningham and opportunities for additional synthetic pitches is also limited, this provision target cannot realistically be achieved.

In terms of cost, recent examples of projects indicate that the approximate cost for a dual synthetic soccer pitch is in the vicinity of \$10m. In addition, a dual soccer pitch site requires approx. 3.11 hectares of land.

Advocacy for land to allow for the development of additional recreation, sporting and community infrastructure in addition to funding for capital developments will be critical.

### 3.3.3 Developer Contributions and Associated Legislative Reforms

As part of the preparation of the Plan for Victoria, the State Government must consider the necessary amendments required to a range of legislation that impacts on the development of land in Victoria.

In particular, in considering Council’s funding capacity to upgrade local infrastructure, the Windfall Gains Tax provisions introduced in July 2023 currently acts as a disincentive to release land for housing and community infrastructure. All Council’s should be exempt from the Windfall Gains Tax provisions to enable this money to be redirected to providing local infrastructure, services and facilities that enhance the liveability of our communities.

The costs of infrastructure also needs to be factored in as part of the implementation of the *Plan for Victoria*. The State government must identify how such infrastructure could be accommodated and funded, as this cannot be solely the responsibility of local government.

Income through development contributions is currently a method by which a council can seek a co-contribution from a developer. The application of the DCP, or other funding mechanism will be a critical revenue stream for councils to support the delivery of an expanded capital works program. Manningham Council has a development contributions plan (DCP) for the Doncaster Hill precinct.

The Victorian Government’s development contributions system urgently needs reform to reduce complexity and provide a streamlined, transparent, and efficient process for preparation and implementation by councils.

The current system is overly complex, time-consuming, and costly for Councils to establish and administer. The need for reform has been identified in numerous reports and audits, including the Victorian Auditor-General’s Office report, *Managing Development Contributions* (March 2020), and *Victoria’s Infrastructure Strategy 2021-2051* (Infrastructure Victoria, 2021). It is imperative that the State Government actions these recommendations and supports councils in maintaining liveable and functional communities.

Council understands that a review and rewrite of the *Planning and Environment Act, 1987* is also underway. There is limited information on the extent of reform proposed however, Council

requests involvement in this process to ensure Council and the community's ongoing role in planning decisions for Manningham.

*Pillar 3 Recommendations:*

**Encourage partnerships between Council and the state government to support future development and sustainable local living in Neighbourhood Activity Centres, including new or improved open spaces and/or urban plazas.**

**Ensure alignment between *Victoria's Infrastructure Strategy 2021-2051* and *Plan for Victoria*.**

**Determine the demand (including land area required) for the provision of upgraded and new service infrastructure, active transport connections, open space and community facilities.**

**Ensuring all residents are within 400m to quality public open space of a minimum 1,500m<sup>2</sup> in size.**

**Provide adequate funding mechanisms to ensure that Manningham can deliver vital services and infrastructure by:**

- **establishing ongoing partnership arrangements with councils to deliver local infrastructure and services.**
- **implementing an alternative ongoing funding stream for the maintenance of essential community infrastructure.**
- **providing full and reliable funding streams to support any additional responsibilities that are transferred to local government.**

**Reform Victoria's development contributions system as a high priority to reduce complexity and to simplify implementation.**

**Introduce exemptions to remove windfall gains tax from council land.**

## **3.4 Pillar 4: Sustainable Environments and Climate Action**

### **3.4.1 Climate Change Response**

Manningham is exposed to significant hazards. Flooding, bushfire, landslip, and extreme weather events are increasing in intensity and frequency. Climate change is already impacting the way councils manage their assets and infrastructure, exploring the costs and benefits of different adaption options and their risk exposures if climate change adaption is not taken. The direct cost of damage is estimated below in Table 2 and is conservative as no direct impact to services etc have been considered.

*Table 2: Quantifying the economic costs of climate change impacts (2022-23)*

	Average annual damage (\$000)	%change in AAD from present day

	Present Day	Nearer future (~2050)	More distant future (~2100)	Nearer future (~2050)	More distant future (~2100)
<b>Manningham</b>	1,998	6,003	8,682	200%	334%

Source: Submission to a Plan for Victoria, ERG of Councils, July 2024

The Plan for Victoria needs to provide a bold direction on how Victoria will become resilient to climate change. A holistic approach needs to be adopted including matters such as: building design, environmentally sustainable development, vegetation cover and managing natural hazards. Council's Climate Emergency Response Plan (2022) outlines Manningham's approach to addressing climate change. Through increased climate action we aim to boost the resilience of our natural and built environments, which in turn will improve liveability, community health and overall economic performance. Targets include:

- Net zero emissions for Manningham Council by 2028
- Net zero emissions for our community by 2035

Initiatives include a combination of mitigation and adaptation, with rooftop solar and batteries, use of energy efficient LED streetlights, public electric vehicle charging infrastructure and strengthening habitat for local biodiversity and wildlife within our bushland areas. Council is also looking at a range of waterway improvements within the rivers and creeks, working in close partnership with Melbourne Water.

### 3.4.2 Environmentally Sustainable Development

To have a climate resilient State, the Victorian government must introduce consistent Environmentally Sensitive Development (ESD) provisions in all planning schemes and the Victorian building code. This should be of a high priority for the State Government.

The Council Alliance for a Sustainable Built Environment (CASBE) is working with several councils to elevate ESD targets for new development via changes to the planning scheme.

A great opportunity exists for State and local governments and the building sector to work together to ensure the buildings are efficient to heat and cool, and comfortable to live in.

### 3.4.3 Greening and Cooling Initiatives

It is also imperative that the Plan for Victoria balances the need for increased housing with the need to increase tree cover to mitigate against the urban heat island effect. On 5 June 2019 Council committed to *Living Melbourne: Our Metropolitan Urban Forest* along with 31 other councils. RMIT's 2020 Vision Report identified that between 2013 and 2016 Manningham lost between 2 and 3 per cent of its total tree canopy cover.

During the same period there was also a 4.6 percent increase in hard surface area, which can result in an increase in local air temperatures. These impacts are exacerbated when coupled with climate change extreme weather events which are projected to intensify. An essential mitigation measure to manage the urban heat island effect is to increase greening in urban areas. This needs to be achieved through an increase in canopy cover on both public and private land.

Meeting the housing targets will have implications for the existing canopy cover and impact the quality of life for residents. The loss of tree canopy increases the impacts felt from the urban heat island effect exposes vulnerable residents to heat stress. Innovative solutions to urban greening, including vertical gardens and green roofs, will be integral to enhancing landscaping in an increasingly urbanised environment.

Action 91 of *Plan Melbourne 2017-2050* commits to delivering a whole-of-government approach to cooling and greening Melbourne to create more liveable and climate resilient communities. It is essential that the State Government through the Plan for Victoria supports and implements this action.

### **3.4.4 Flooding and Integrated Water Management**

#### *Flooding*

Manningham is working in partnership with Melbourne water on developing flood maps for Manningham and its local catchments. The impacts on flood risk associated with climate hazards will be compounded by the increase in impervious surfaces associated with population growth and anticipated levels of development. The State Government must provide leadership in managing flooding risk through the Victorian planning system, in the same manner it did with addressing bushfire hazard.

Several councils, including Manningham, have engaged specialists to undertake detailed flood modelling, with the aim of introducing relevant planning controls in the Manningham Planning Scheme. The State Government needs to introduce flood controls to appropriately condition and / or minimise building approvals being granted in areas which are known to be subject to flooding. The application of flooding controls needs to consider the most current data available on the impacts of climate change on flooding.

More work is needed on building community flood resilience, including modelling and communication of flood risk for both pluvial and fluvial flooding. Consideration should be given to expansion of the *Flood Resilient Homes Program* such as the program being piloted in Brisbane. The Building Code should require use of flood resilient materials for proposed structures in areas of flood risk.

#### *Integrated Water Management*

The proposed housing targets will pose Integrated Water Management challenges. Increases in development densities need to give due consideration to impacts on stormwater infiltration opportunities, potable water demand, alternative water supplies and stormwater volumes and pollutant loads discharging to waterways to ensure a sustainable future.

Modelling and planning are required to understand water demands, alternative water supply opportunities and associated infrastructure needs. The management of flood and environmental risks associated with the proposed level of development necessitates early planning to achieve the adopted integrated water management catchment targets and measures. Planning for infrastructure needs to be progressed early in the process to ensure the viability of the proposed level of development.

A case study of the impacts of development and population growth in Doncaster Hill and the Eastern Golf course (Tullamore) on local water supply and sanitation is a case in point. Strategic work identified that there may be constraints on water supply that could arise at the full build out of Doncaster Hill. To address these challenges, Yarra Valley Water has proposed development of the Tram Road Reserve Underground Water Recycling Facility. Planning approval has since been secured and the facility will supply Doncaster Hill and the Tullamore Estate with at least 750,000 litres per day of recycled water for laundry, toilet flushing and irrigation purposes, offsetting demand for potable water. The capacity of this facility is fit for purpose for the current Doncaster Hill population projections and not for the level of growth anticipated under the proposed Housing Targets.

#### *Pillar 4 Recommendations:*

**Introduce consistent ESD provisions in all planning schemes and the Victorian Building Code.**

**Introduce a new planning control for urban areas that protects and increases canopy vegetation on both public and private land to minimise the urban heat island effect and improve the landscape qualities.**

**Undertake a Ministerial amendment to introduce special building overlays across the State to address flooding issues, like the approach adopted with the Bushfire Management Overlay.**

**Ensure that integrated water management targets and measures can be achieved under the growth scenario envisaged by Plan for Victoria.**

## 4 Conclusion

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Council considers that the matters raised in our submission reflects local government insights on the challenges and opportunities of accommodating significant growth now and into the future. What we raise in this submission will no doubt be consistent with the concerns of other local governments and strongly aligns with the draft submission by the Eastern Region Group of Councils.

The need for additional housing is acknowledged, however a multi-faceted solution and whole of government approach is required. Numerous factors impact the delivery of housing, with many of these elements being outside of Council's influence. Council is committed to establishing a planning policy setting that facilitates appropriate housing growth and encourages investment, which is demonstrated through the comprehensive process underway to develop the new *Manningham Residential Strategy*.

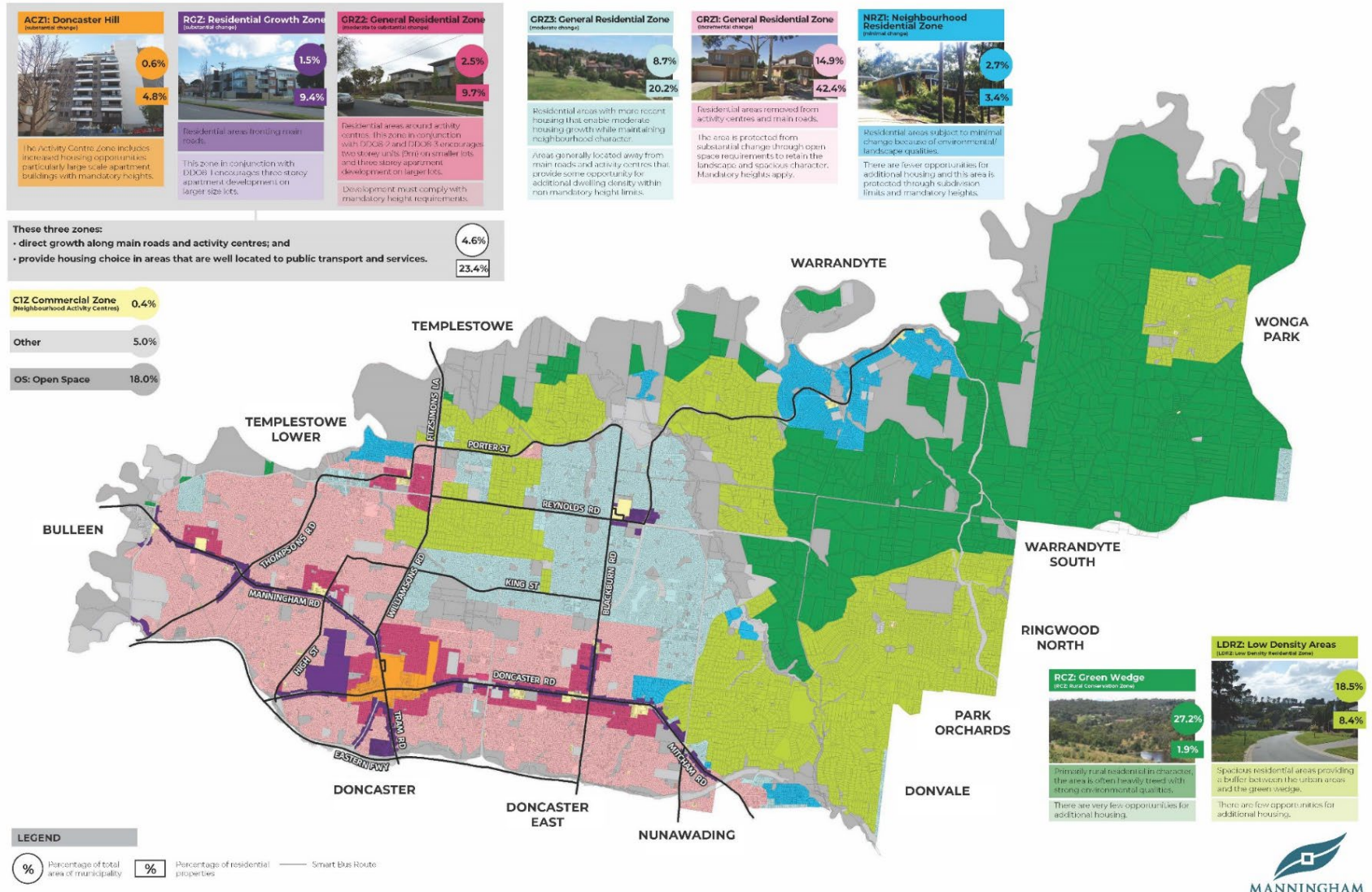
Council holds significant concerns around the implications of setting such ambitious Housing Targets and the impact it may have on the existing settlement pattern of Manningham, and the highly valued neighbourhood character of Manningham's residential areas. There is a disconnect between the ambitions of the Housing Targets and the implications on the urban form of residential neighbourhoods. A nuanced approach to address local land capability and capacity, housing needs and neighbourhood character attributes is essential.

Secondly, to release housing targets on the scale proposed without making any commitment to the infrastructure required to support such exceptional growth is concerning. The Manningham community has a right to such fundamentals as public open space, adequate drainage and sewage systems, education facilities, health services and transport networks. Council alone cannot fund all upgrades required to its facilities and services, given the numerous financial constraints raised above. It is imperative that a range of funding and delivery mechanisms are established by State Government to ensure the continued delivery of vital services and infrastructure to support a rapidly expanding population.

We trust that a further round of consultation will occur once a draft Plan for Victoria is prepared and look forward to being involved in a subsequent engagement process and ongoing discussions with DTP.

Should you have any questions regarding this submission, please contact Andrew McMaster, Director City Planning & Liveability at: [andrew.mcmaster@manningham.vic.gov.au](mailto:andrew.mcmaster@manningham.vic.gov.au)

# Manningham's residential character areas





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