

29 September 2024

Department of Transport and Planning
1 Spring Street
MELBOURNE VIC 3000

UDIA Victoria Submission – Metropolitan Activity Centres

The Urban Development Institute of Australia, Victoria (UDIA Victoria) welcomes the opportunity to provide written feedback on the proposed plans for the Metropolitan Activity Centres at to apply in identified Metropolitan Activity Centres at Broadmeadows, Camberwell, Chadstone, Epping Frankston, Moorabbin, Niddrie, North Essendon, Preston and Ringwood. We are grateful to represent the urban development industry in ongoing consultation on these important proposals.

Our written submission provides a high-level outline of key issues. This does not constitute an exhaustive list and we look forward to continuing to work closely with the Department of Transport and Planning (the Department) through ongoing industry consultation.

We also look forward to continuing to work closely with the State Government, through the Affordability Partnership. UDIA Victoria and its members have a long history of working with all levels of government to deliver improved industry and community outcomes.

About UDIA Victoria

UDIA Victoria 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.

UDIA Victoria is 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.

UDIA Victoria is focused on establishing the right policy and regulatory settings to enable the development industry to continue building diverse, high-quality and sustainable housing to meet the demand of Victoria's rapidly growing population.

We apply a rigorous, research and evidence-based approach to developing policy advice for decision-makers, at all levels of government. UDIA Victoria research and the deep industry expertise of our policy committees has guided this submission.

Background

Victoria's population is growing at a rapid rate, outpacing every other state in Australia. Last year, Melbourne surpassed Sydney as Australia's most populous city – almost a decade earlier than previously forecast. Victoria's population is set to reach 11.2 million by 2056, with Melbourne on track to becoming a city of 9 million by 2050.

Much of the strong population growth is due to overseas and interstate migration, as more people, attracted to our prized liveability, choose to call Victoria home. Historically, population growth has fuelled Victoria's economic prosperity, however, the unchecked challenge of

housing Victoria's growing population may see this negatively impact growth in coming years.

For the last three decades housing and rental affordability has been in steep decline, culminating in the current housing crisis. Inadequate access to housing is now threatening to undermine the strength, stability, productivity and economic prosperity of our State.

Late-2023 saw the release of the eagerly anticipated Victorian Government's *Housing Statement*. This follows the National Cabinet's commitment to deliver 1.2 million new homes over the next five years, to July 2029. Despite a focus on improving housing supply, dwelling construction is trending down and expected to be lower in 2024 than previous years.

Approximately 52,330 homes are forecast to begin construction in 2024. In 2023, construction commenced on approximately 52,300 new homes, the lowest performing year since 2013.

This submission is prepared in the context of considerable headwinds facing industry, government and the community. Construction cost escalation and an uncompetitive taxation and regulatory environment is making residential development prohibitively expensive in Victoria compared to other states.

Metropolitan Activity Centres

A strong focus on facilitating increased development density in the inner- and middle-ring suburbs is welcome and UDIA Victoria supports this approach. The 10 pilot Metropolitan Activity Centres represent an encouraging step towards delivering on this ambition – building over 60,000 new homes close to essential services, jobs, and public transport.

However, there are considerable challenges to navigate to achieve the desired outcomes in each of these 10 precincts.

Affordable Housing

UDIA Victoria supports the objective to increase the supply of social and affordable housing in Melbourne's established areas. However, the mechanisms for achieving this, such as discounted sales or gifting of homes to registered housing agencies, could impose additional financial pressures on developers. UDIA Victoria will continue to advocate for alternative approaches, such as broader government incentives, rather than placing the full burden on developers. A balanced approach will be essential to encourage investment while meeting the growing demand for affordable market housing.

Infrastructure delivery and contributions

A proposed simplified infrastructure funding mechanism is a positive development, though UDIA Victoria seeks more detail on the timing and delivery of critical infrastructure. As the population grows, adequate transport, community facilities, and public spaces will be essential to support sustainable development. UDIA advocates for a more collaborative approach between developers and the government to ensure infrastructure is delivered in tandem with new housing projects, avoiding delays that could impact project feasibility.

UDIA Victoria highlights the need for further investments in active transport (cycling and pedestrian infrastructure) to reduce car dependency, as well as improvements to public transport services. This is crucial for supporting the proposed housing density and ensuring that increased density in these precincts can be achieved.

Long-term underinvestment in the provision of critical infrastructure and amenities, including schools, healthcare centres, community hubs, recreation facilities, public open space and transport connections is a major issue. There is a risk that communities are will experience long-term entrenched disadvantage as a result of lagging delivery of population-serving infrastructure.

In addition, infrastructure staging and delivery is a major issue for residential development. Without timely State Government investment in enabling infrastructure, hundreds-of-thousands of new homes and jobs will fail to be delivered over the next decade.

We encourage the State Government to establish a publicly available pipeline of priority state infrastructure investments, which:

- Identifies all state infrastructure required to service Melbourne's suburbs over a 10-year period;
- Is based on an objective cost-benefit analysis with a focus on infrastructure that will enable the greatest development of housing and jobs in growing suburbs;
- Allows consideration for early funding of projects if savings can be delivered; and
- Maximises the affordable delivery of new homes to support the State's housing targets.

Environment and heritage considerations

The proposed plans rightly address environmental issues demanding attention, such as contamination, noise, and heritage. However, we note the potential cost and complexity of meeting environmental and heritage requirements, which could introduce delays or increase costs for delivery. We encourage the consideration of a streamlined processes or clearer guidelines to ensure these issues are addressed efficiently without creating barriers to development.

Compatibility of replication

There is a significant challenge in formulating a template of built-form guidelines that can be replicated and rolled out across activity centres, as each locale presents unique physical, social, cultural, and economic characteristics.

Economic viability is fundamental to the delivery of development projects. Local context and characteristics play a critical role in the evaluation of a potential project site. Site-specific characteristics must inform the preparation of built form and urban design parameters to ensure they can be successful.

Industry has expressed concern that this has not been incorporated into the Activity Centre design phase. It is our understanding that the majority of draft plans have no economic evidence or analysis publicly available for review.

Need for tailored design elements.

As previously noted, the currently proposed density matrix does not appropriately account for the individual characteristics of each Activity Centre, its location, its future potential, or its strategic role within each municipality. Access to public transport though vital, is not the only determinant of the existing and future roles of activity centres.

We note that Knox Central and Doncaster are both major activity centres with neither having access to either a train or tram route. We would ask that due consideration be attributed to

providing more tailored design elements to the proposed Activity Centre approach, accounting for a location's unique fabric and future state.

Similarly, the suite of precinct typologies is too simplistic and fails to recognise individual built-form characteristics of activity centres and landholdings, or how they relate to adjoining or nearby sites, road networks and their hierarchy. Further, they don't suitably recognise opportunities for consolidation.

Further clarification is required to protect policy intent

The introduction of deemed-to-comply provisions is generally supported. However, these discretionary standards may unintentionally be interpreted, particularly by Council and residents, as the bare minimum/maximum and therefore treated as mandatory. Further clarification around the operations of these standards is important to ensure that they are clearly understood to be benchmarks.

We also question mandated separation distances on large opportunity sites given that they will be designed in an integrated manner that can adequately manage amenity impacts. There is no justification provided for how these were devised.

Community and industry consultation

UDIA Victoria acknowledges the significant community consultation undertaken as part of this plan. However, there is a need to manage community expectations regarding the level of housing growth and density increases in the area. While it is essential to engage with the community, planning certainty is also crucial for the development industry. The introduction of deemed-to-comply standards and streamlined approvals processes is a positive step towards providing greater certainty.

Other universal complexities to consider:

- There is often a lack of understanding about how various policy objectives interact within precincts, leading to unintended cost impacts. In some cases, conflicting policies create gridlock, where conditions attached to permits—such as requirements for tree canopy coverage, utility placements, or road access—make it nearly impossible to deliver the intended housing supply outcomes.
- The private sector is often left to manage community concerns due to insufficient communication during the strategic development phase. This places undue burden on them to interpret policy goals and engage the public.
- Planning schemes can become outdated quickly, and the context that shaped initial submissions may no longer apply by the time decisions are made.
- There is growing scepticism within the industry about whether planning reforms in activity centres are genuinely aimed at increasing housing supply, or if they are more focused on capturing land value to fund nearby infrastructure projects.
- Higher levies and development contribution premiums in activity centres can undermine project viability. New developments in these areas often require additional support to compensate for limited infrastructure and the volatility of early-stage markets.

Broadmeadows Activity Centre



Broadmeadows Activity Centre (Source: Department of Transport and Planning)

Increased housing density

The plan's emphasis on increased housing density is aligned with UDIA Victoria's focus on addressing Victoria's housing supply challenges. Broadmeadows' potential to deliver up to 4,500 new homes by 2051 supports the broader goal of providing diverse and affordable housing options. However, UDIA Victoria questions whether the current planning controls are sufficiently flexible to attract large-scale private investment and ensure timely housing delivery. The introduction of "deemed to comply" standards would be a positive step towards streamlining approvals, but clarity is needed on whether these standards provide the level of security, certainty and attractiveness to facilitate the desired outcomes.

Infrastructure alignment

While the plan outlines the need for improved community infrastructure and transport links, UDIA Victoria highlights the risks if these infrastructure investments are not delivered in line with housing growth. The success of the Activity Centre hinges on the State Government's commitment to aligning infrastructure delivery with population increases, especially in key areas like public transport, green spaces, and community services. Any delays or funding shortfalls in these areas could undermine the liveability of the centre and make it less attractive to developers and future residents.

Built form controls and urban design

The proposed built form controls, including height limits of up to 12-storeys, present desirable opportunities for urban consolidation. However, we are concerned over the mandatory controls related to setbacks, street wall heights, and sun access, which could impose constraints on creative design solutions and reduce net developability. We would encourage greater flexibility in design to encourage diverse and architectural outcomes while still meeting the public realm outcomes and achieving contextually appropriate development.

Economic viability and market demand

While the plan positions Broadmeadows as a strategic centre for commercial growth, UDIA Victoria questions whether current market conditions and demand projections fully support the scale of commercial and mixed-use developments envisioned. There may be a need for more detailed market analysis to ensure that the commercial elements of the plan are appropriate, realistic and financially sustainable in the long-term.

Opportunity sites

While the plan positions Broadmeadows as a strategic centre for commercial growth, current market conditions and demand projections may not support the scale of commercial and mixed-use developments envisioned. We request that there is more transparency regarding what modelling and economic evaluations have informed strategic planning decisions.

Airport proximity and impacts on building heights

The plan's height controls, which are influenced by proximity to the Essendon Fields Airport, may present a significant constraint on development.

While UDIA Victoria supports the overall direction of the Plan, we note the need for flexibility and discretion in planning controls, robust infrastructure commitments, and clear guidelines on affordable housing to ensure the centre's growth is achievable and attractive to developers.

Collaboration between the public and private sectors will be essential to overcoming potential challenges and unlocking the centre's full potential.

Camberwell Junction Activity Centre



Camberwell Activity Centre (Source: Department of Transport and Planning)

Housing diversity in Camberwell Activity Centre

The plan's target of delivering up to 8,000 new homes by 2051 aligns with the broader goal of increasing housing supply. However, UDIA Victoria might raise concerns about the feasibility of achieving these housing numbers given the potential constraints related to the built form typologies and height restrictions. While medium- and high-density developments are supported, the balance between residential density and heritage/amenity considerations may limit the full potential of certain sites. Flexibility in planning controls and the integration of innovative housing typologies are critical to ensuring these targets are met without stifling developer interest.

Heritage and Built Form Controls

The retention of existing heritage overlays is consistent with maintaining the character of Camberwell Junction. However, UDIA Victoria argues that restrictive heritage and design overlays, such as the Design and Development Overlay (DDO17), could constrain development outcomes for the precinct. We encourage a more flexible approach, allowing for higher density developments and high-quality architectural outcomes, without compromising the broader heritage value.

Streamlined approvals and Infrastructure Contributions

UDIA Victoria is supportive of streamlined planning approval processes and shorter amendment pathways – this will facilitate faster project delivery. However, the critical issue of infrastructure delivery needs further clarity. While the plan proposes simplified infrastructure funding mechanisms, UDIA Victoria questions whether these mechanisms will adequately cover the significant costs associated with infrastructure upgrades to support the population increase. Clearer timelines and funding commitments are essential to ensure that essential infrastructure, such as schools, transport, and parks, keeps pace with development.

Public transport and connectivity

UDIA Victoria generally supports the focus on transport-oriented development, particularly in suburbs already well-served by transport infrastructure. However, we highlight the need for greater detail on how the existing transport infrastructure will be upgraded to handle the increased population. While Camberwell benefits from multiple tram and train services, additional investments in active transport connections (cycling and pedestrian pathways) would also improve connectivity and accessibility.

Commercial viability and market demand

UDIA Victoria supports the adoption of ambitious housing targets, however without access to detailed modelling, it is challenged to determine whether these can realistically be achieved in all settings. High costs associated with land assembly, planning and development in established suburbs—especially coupled with heritage and design overlays, and affordable housing requirements—will impact development feasibility. UDIA Victoria encourages the exploration of additional incentives and flexible planning controls, in order to make the centre more attractive for private investment.

Chadstone Activity Centre



Chadstone Activity Centre (Source: Department of Transport and Planning)

Housing density and diversity

UDIA Victoria is supportive of the plan to deliver up to 8,000 new homes in the area by 2051. However, UDIA we are concerned with the potential of achieving these significant housing numbers, given the built form typologies constraints and height restrictions. While medium- and high-density developments are supported, the balance between residential density and heritage/amenity considerations may limit the full potential of certain sites. Flexibility in planning controls and the integration of innovative housing typologies will be critical to ensuring these targets are met without stifling developer interest.

Heritage and Built Form Controls

While the recognition of Chadstone's heritage and the preservation of key streetscapes is important, UDIA Victoria submits that overly rigid built form controls, especially around height and setbacks, could still significantly minimise development opportunities. The proposed maximum building height of 40-metres (12-storeys) in the core shopping precinct and six-storeys in other areas may limit the economic viability of larger projects. We propose a more flexible approach to height controls in key development areas, especially given Chadstone's role as a significant commercial and retail hub.

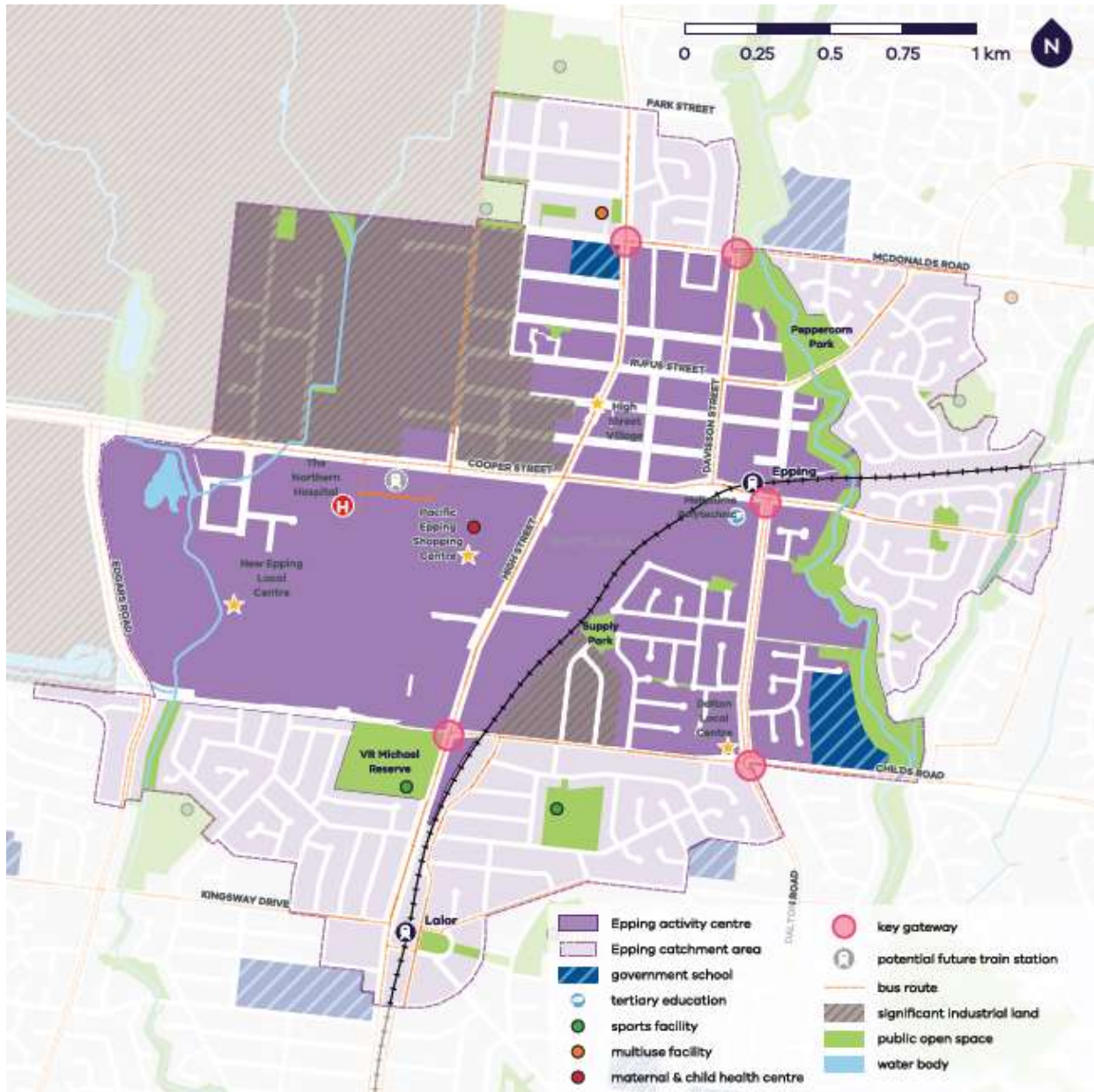
Public transport and connectivity

Chadstone's location, with access to major roadways and public transport hubs, makes it an ideal candidate for growth. However, UDIA Victoria highlights the need for further investments in active transport (cycling and pedestrian infrastructure) to reduce car dependency, as well as improvements to public transport services. This is crucial for supporting the proposed housing density and ensuring that Chadstone evolves into a well-connected, walkable centre.

Sustainable design and green infrastructure

The focus on increasing tree canopy coverage and improving green infrastructure is commendable, particularly in response to climate resilience. However, we implore policymakers to consider the impact these provisions have on development potential. Often canopy coverage and green infrastructure considerably reduce the developable area of smaller land parcels. Additionally, while the plan discusses sun access and wind management, we request further clarity on how these environmental controls will be enforced without overly complicating the development approval process.

Epping Activity Centre



Epping Activity Centre (Source: Department of Transport and Planning)

Proposed growth and housing diversity

The plan's goal of delivering between 9,800 and 13,900 new homes by 2051 is supported by UDIA Victoria. We support the need to achieve higher-density housing in Melbourne's major activity centres. However, we query whether the proposed built form controls and height limits, especially in the catchment areas are appropriate to deliver this scale of increased density. We consider more flexible planning controls that allow for greater density in key locations are appropriate, considering the ambitious targets.

Public transport and connectivity

UDIA Victoria is supportive of the plan's strong focus on improving transport links, cycling, and pedestrian infrastructure to enhance connectivity. However, the plan currently lacks detail on how public transport services, particularly train and bus routes, will be upgraded to handle the increased population. Investment in active transport and road upgrades will be critical to support the centre's growth and encourage sustainable mobility options.

Built From Controls and proposed height restrictions

The proposed height controls, with allowances for buildings up to six-storeys in certain areas, are positive. However, UDIA Victoria has concerns that these height limits are potentially restrictive in parts of the activity centre, limiting the potential for higher-density developments. Greater discretion of building heights should be considered – particularly around transport hubs and key commercial areas. This would encourage more significant investment and support the delivery of more housing in a shorter timeframe.

Catchment Area development

The catchment area's focus on creating walkable neighbourhoods with increased housing diversity is positive. However, we query whether the proposed height and density controls are ambitious enough to fully capitalise on the catchment's potential. We encourage decision-makers to further explore opportunities to unlock increased development through rezoning or strategic site acquisitions to facilitate larger-scale projects that deliver more housing and community amenities.

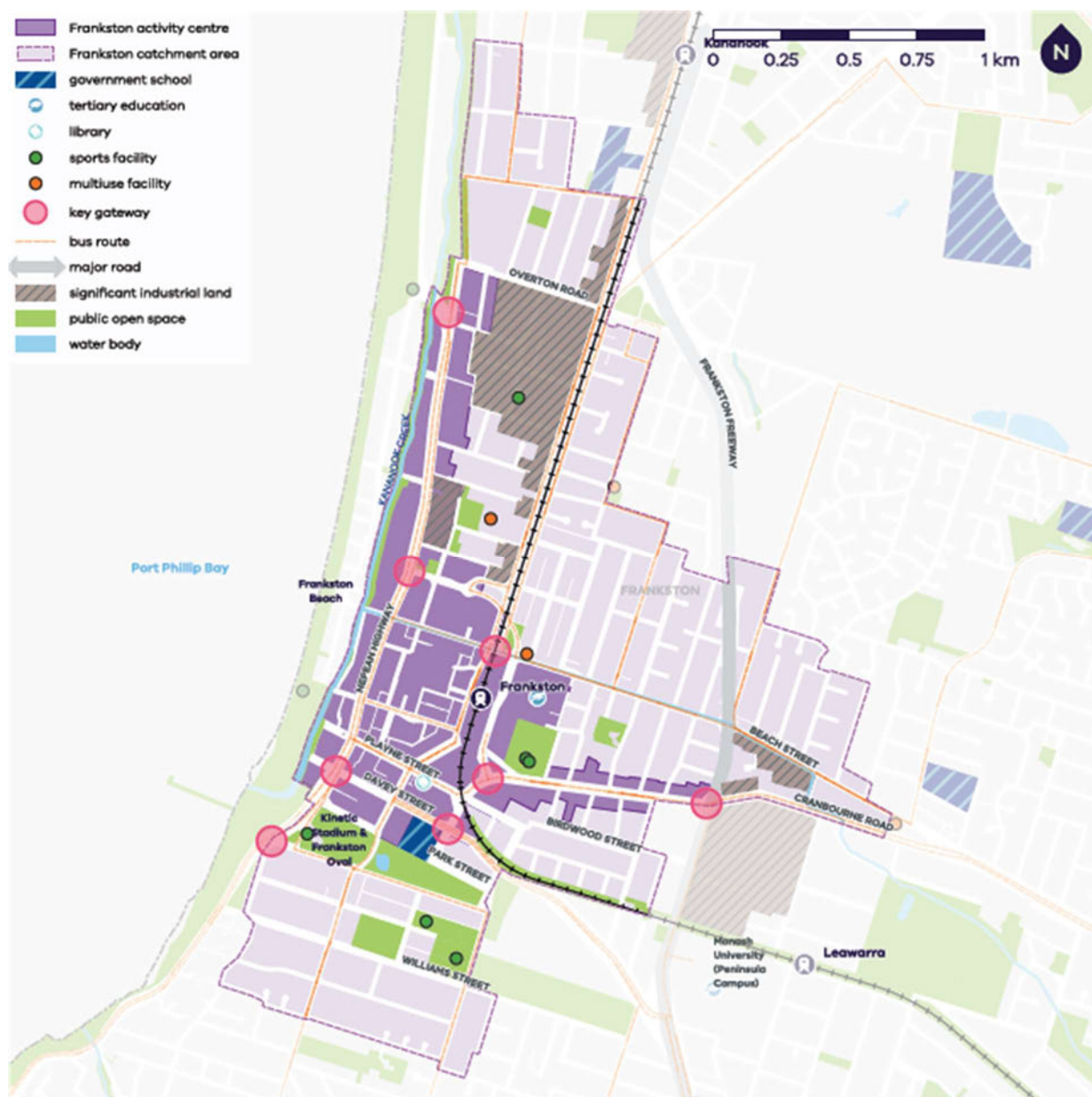
Sustainability and green infrastructure

Chadstone's location, with access to major roadways and public transport hubs, makes it an ideal candidate for growth. However, UDIA Victoria highlights the need for further investments in active transport (cycling and pedestrian infrastructure) to reduce car dependency, as well as improvements to public transport services. This is crucial for supporting the proposed housing density and ensuring that Chadstone evolves into a well-connected, walkable centre.

Community infrastructure

The plan acknowledges the need for upgraded community infrastructure, including schools, recreation centres, and open spaces. UDIA Victoria emphasises that these upgrades must be prioritised to keep pace with population growth. We strongly recommend clear timelines and commitments from Government to ensure that critical infrastructure is delivered on time and meets the needs of growing communities.

Frankston Activity Centre



Frankston Activity Centre (Source: Department of Transport and Planning)

Housing density and Built Form Controls

The plan's focus on increasing housing density within the Frankston Activity Centre, particularly through the development of medium- to high-density apartments and townhouses, is a necessary response to Melbourne's growing population. UDIA Victoria agrees with this strategy, but we are concerned that rigid height and design controls may inhibit development outcomes. While maintaining local character and neighbourhood amenity is critical, overly prescriptive controls can reduce flexibility for developers, limiting innovation and the ability to respond to market demands.

We encourage policymakers to work closely with the development industry in the on appropriate controls that would allow for greater adaptability to site-specific conditions, such

as market trends and environmental constraints. Additionally, UDIA Victoria encourages the plan to include provisions for periodic review of built form controls to ensure they remain responsive to evolving development needs.

Public transport and connectivity

Frankston is well-served by public transport, with train stations, bus routes, and pedestrian pathways providing desirable connectivity. UDIA Victoria supports the plan's approach to improving walkability and reducing car dependence.

We encourage decision-makers to prioritise investment in transport infrastructure, including increased service frequency and capacity, that provides the greatest return on investment to the community, and supports increased density. Without a clear commitment to these improvements, there is a risk that increased density could exacerbate existing issues.

Environmental considerations and contamination management

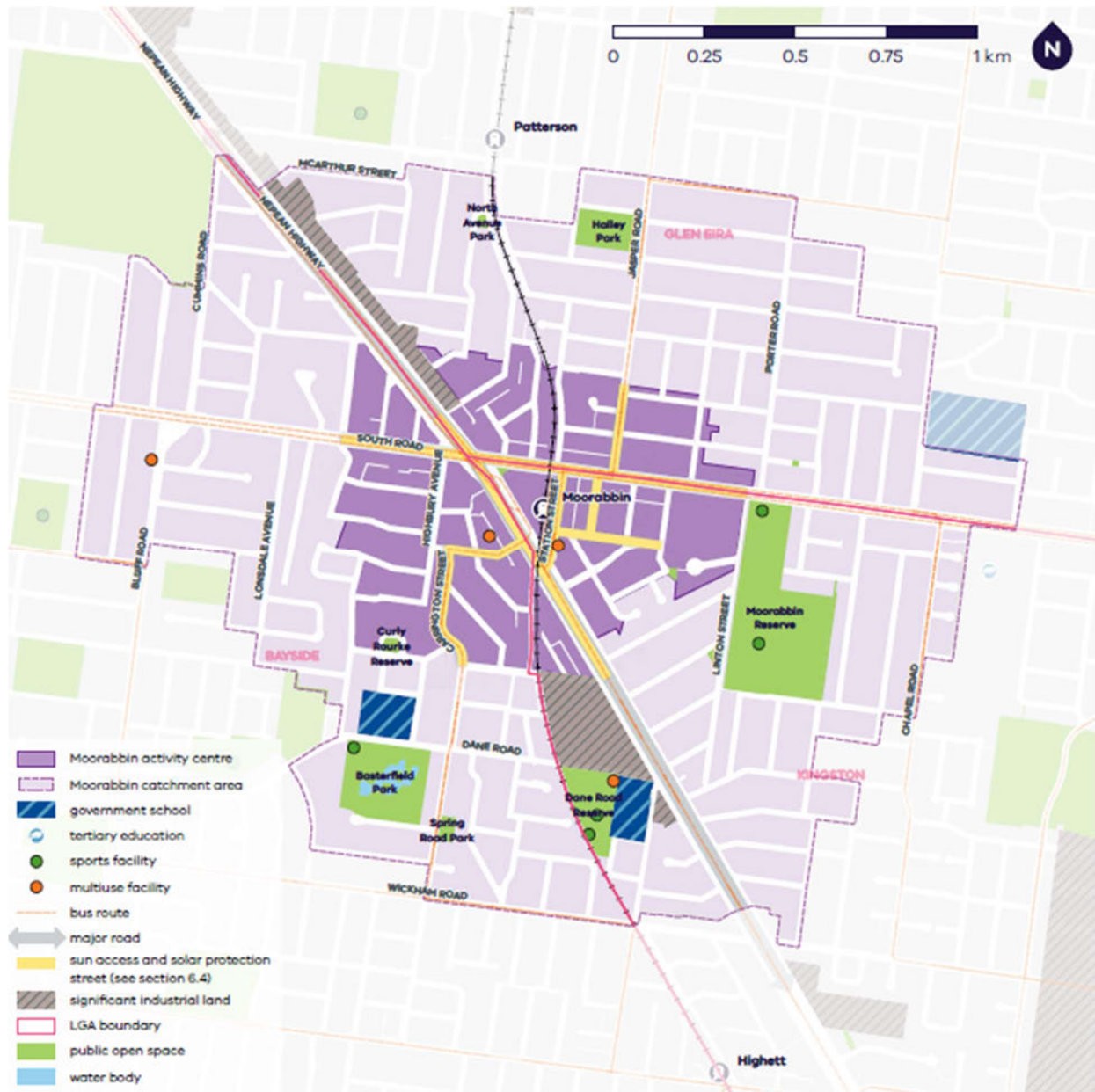
The plan's focus on managing environmental constraints, including noise, contamination, and amenity buffers, is important. However, UDIA Victoria is concerned that the processes for addressing environmental issues could introduce significant costs and delays for developers. There is potential for this to lead to project delays and increased costs if not managed early in the development process. Providing incentives or support for developers working on sites with environmental issues, such as contamination, would support improved project feasibility.

Community consultation and ongoing engagement

The extensive community consultation undertaken as part of this plan is a positive aspect, but managing community expectations regarding increased density and infrastructure changes will be critical to its ongoing success. UDIA Victoria supports the introduction of deemed-to-comply standards, which provide greater certainty for both developers and the community by establishing clear expectations for development outcomes.

However, it is important that these standards are applied consistently to avoid confusion or delays in the approval process. Ongoing community engagement will be necessary to ensure that local concerns are addressed while maintaining a focus on delivering the housing and infrastructure required to support population growth.

Moorabbin Activity Centre



Moorabbin Activity Centre (Source: Department of Transport and Planning)

Housing density

UDIA Victoria is supportive of the plan's aim of delivering between 5,000 and 6,800 new homes by 2051. We are also encouraged by the focus on moderate-density residential developments of up to 12 storeys in key areas. However, we would like to better understand how these proposed controls were devised. It is possible that the proposed height limits across various zones do not sufficiently maximise the potential of prime development sites. Increased flexibility in height controls, particularly in areas adjacent to transport hubs and major commercial precincts, should be encouraged to facilitate more substantial developments.

Public transport and connectivity

The focus on enhancing transport connections, particularly around the Moorabbin railway station and multiple bus routes, is crucial for supporting the activity centre's growth. However, the precinct also requires substantial investment in active transport infrastructure, such as cycling and pedestrian pathways, to support sustainable mobility and reduce car dependency. Enhanced connectivity to nearby key locations, such as the Southland Shopping Centre and Moorabbin Airport, would drive economic and housing growth in the region.

Built Form Controls

UDIA Victoria has concerns regarding the rigidity of the proposed built form controls, including height limits and podium heights. Particularly in regard to minimum and maximum heights. There are some instances where proposed height limits are lower than what has been permitted for existing and approved buildings.

More flexibility in built form controls, particularly in the non-heritage and large opportunity sites, would encourage larger developments and maximise land use outcomes. The introduction of "deemed to comply" standards provides some certainty for developers, but we advocate for further clarity on discretionary provisions to avoid delays in approvals.

Further, the introduction of mandatory sun access controls may severely and unduly constrain building envelopes and diminish development potential.

Large opportunity sites

UDIA Victoria supports the plan's focus on large opportunity sites, which offer significant potential for transformative, high-density developments. However, we encourage the consideration of additional incentives for developers to undertake large-scale projects, such as greater flexibility in height limits or expedited planning processes. Additionally, clear guidance on master planning and infrastructure requirements for these sites will be critical to ensuring successful development outcomes

Niddrie (Keilor Road) Activity Centre



Niddrie (Keilor Road) Activity Centre (Source: Department of Transport and Planning)

Supporting housing and population growth

UDIA Victoria is supportive of the plan's objective of delivering 3,400 to 3,900 new homes by 2051. However, we question the appropriateness of the proposed built form controls and whether they will achieve the desired outcome.

Public transport and connectivity

UDIA Victoria supports the emphasis on improving transport links, particularly the integration of the Route 59 tram line and local bus routes. However, we note additional investments in transport infrastructure, such as cycling paths and pedestrian walkways, is also necessary to support sustainable growth and the desired development outcomes.

Built Form Controls

The proposed built form controls, with street wall heights of up to three storeys and overall building heights of up to 10 storeys, aim to balance urban growth with the local character of the Niddrie (Keilor Road) precinct. However, UDIA Victoria is concerned about whether these controls are too restrictive, particularly in key development areas. We encourage decision-makers to consider greater flexibility in height and setback controls to facilitate higher-density developments and maximise land use in strategic sites near transport hubs.

Large opportunity sites

UDIA Victoria is encouraged by the identification of large opportunity sites, which offer significant potential for transformative development. However, we call for additional incentives for developers to take on these large-scale projects, such as greater flexibility in height limits or expedited planning processes. Clear guidance on master planning and infrastructure requirements for these sites will also be critical to achieving the desired development outcomes.

Mandatory sun access and wind management

UDIA Victoria is concerned about how the proposed standards may be applied in practice, particularly in terms of how they impact project viability. We recommend a more balanced approach to these standards, with greater flexibility in design to encourage innovative solutions without compromising public amenity.

North Essendon Activity Centre



Northern Essendon Activity Centre (Source: Department of Transport and Planning)

Supporting housing and population growth

UDIA Victoria commends the ambition of delivering between 5,100 and 6,200 new homes by 2051. We support the objective of increasing housing diversity, particularly through medium-density residential developments. However, there could be concerns regarding the feasibility of meeting these targets, particularly with the proposed height limits of 5-10 storeys.

Large opportunity sites

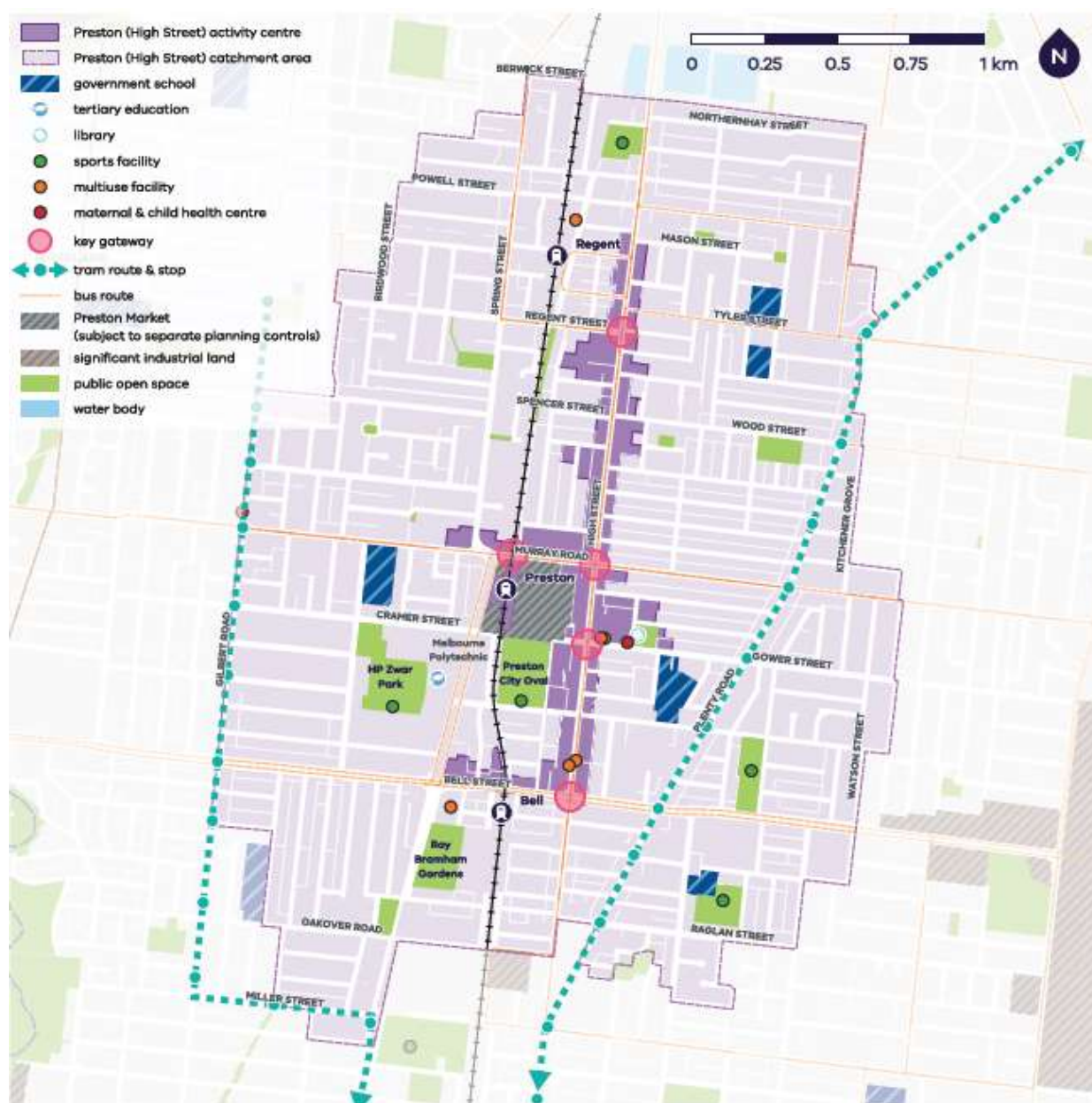
UDIA Victoria supports the identification of Large Opportunity Sites within the activity centre. Sites which are greater than 5,000 square metres and can accommodate developments up to 12 storeys, represent significant opportunities for high-density, mixed-use projects.

However, we recommend the consideration of additional incentives or streamlined approval processes to attract developers to these sites and drive desired development outcomes.

Mandatory sun access and wind management

UDIA Victoria is concerned about how the proposed standards may be applied in practice, particularly in terms of how they impact project viability. We recommend a more balanced approach to these standards, with greater flexibility in design to encourage innovative solutions without compromising public amenity.

Preston (High Street) Activity Centre



Preston Activity Centre (Source: Department of Transport and Planning)

Public transport and connectivity

The Preston Activity Centre benefits from strong public transport connections, including train stations, tram routes, and bus services. UDIA Victoria supports the plan's emphasis on improving walkability and promoting sustainable transport modes. However, community concerns regarding traffic congestion are valid and must be addressed as part of the broader transport strategy.

The plan should prioritise improvements to public transport infrastructure, such as increasing the frequency and capacity of trains, trams, and buses. Additionally, investment in cycling infrastructure and pedestrian pathways will be essential to encourage sustainable transport.

Built Form Controls and proposed height restrictions

UDIA Victoria is supportive of the overall approach housing density within the Preston Activity Centre, particularly the focus on medium- to high-density developments. However, the controls on building height and design, while aimed at maintaining local character, could restrict development potential and reduce the flexibility needed to respond to specific site conditions and market demand.

A more flexible approach to built form controls is needed, allowing developers to adapt designs based on site constraints, market conditions, project viability, and community needs. The plan should consider periodic reviews of these controls to ensure they remain responsive to evolving factors.

Environmental considerations and contamination management

The plan's focus on environmental constraints, such as noise, contamination, and amenity buffers, is appropriate to protect long-term livability in the area. However, developers may face increased costs and potential delays in addressing these issues, particularly in cases involving site contamination.

UDIA Victoria recommends a streamlined process for managing environmental issues, allowing developers to address these constraints early in the planning process. This will help reduce delays and ensure that projects remain financially viable. In cases where remediation is required, offering incentives or support to developers could help balance the cost burdens associated with contaminated sites.

Catchment Area development

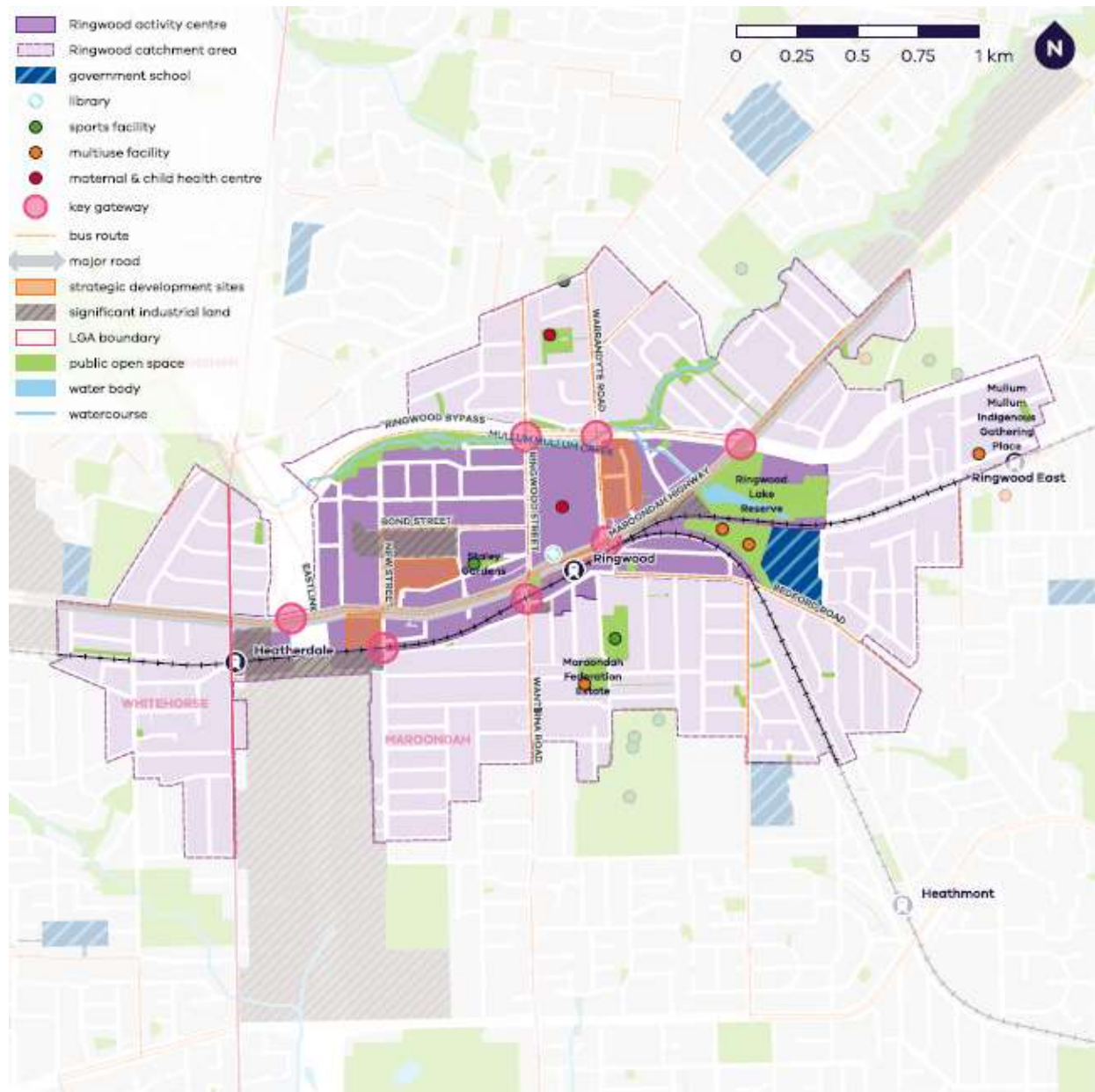
The plan's focus on creating walkable communities within 800-metres of the Activity Centre is a positive step toward reducing car dependency and promoting sustainability. However, UDIA Victoria questions whether the proposed density controls within the catchment areas are sufficient to fully unlock the development potential proposed.

Community and stakeholder engagement

UDIA Victoria acknowledges the extensive community consultation that informed the development of this plan. However, to ensure the successful implementation of the plan, it is crucial that the community understands the broader benefits of increased housing density, such as improved local services, enhanced public spaces, and better transport options.

The introduction of deemed-to-comply standards is a positive step, as it provides certainty for both developers and the community regarding what development outcomes can be expected. Consistent application of these standards will be important to build trust and ensure that the plan's objectives are met.

Ringwood Activity Centre



Ringwood Activity Centre (Source: Department of Transport and Planning)

Public transport and connectivity

UDIA Victoria supports the plan's focus on enhancing transport connectivity within the activity centre, particularly around the two train stations (Ringwood and Heatherdale) and bus routes. However, further investments in transport infrastructure, particularly active transport (cycling and pedestrian pathways), will be crucial for supporting the population increase and reducing car dependency. We also suggest expanding public transport capacity to accommodate future growth, particularly during peak times.

Built From Controls and proposed height restrictions

The proposed built form controls, which guide developments to specific areas within the activity centre, are generally positive. However, UDIA Victoria is concerned about their appropriateness and whether they adequately account for development economics, particularly around building heights and design standards. We strongly recommend economic considerations be embedded in strategic planning, with greater transparency, including providing access to robust modelling.

Environmental considerations and contamination management

UDIA Victoria commends the plan's focus on addressing environmental issues, including potential site contamination, noise, and heritage protection. We highlight the high potential cost and complexity of addressing these issues, which could delay projects or add considerably to their cost. We encourage local and state government to work closely with proponents to ensure these issues are addressed without jeopardising the vision of the centre.

Catchment Area development

The plan's focus on creating walkable communities within 800-metres of the Activity Centre is a positive step toward reducing car dependency and promoting sustainability. However, UDIA Victoria question whether the proposed density controls within the catchment areas are sufficient to fully unlock the development potential proposed.

Community consultation and development alignment

UDIA Victoria are supportive of the plan to engage extensively with local community and align with the Ringwood MAC Masterplan (2018). However, we also suggest ongoing collaboration with key stakeholders, including developers, to ensure that the plan remains compatible with current and evolving market conditions.

Further consultation

We value the strong working relationship between UDIA Victoria and the State Government and are grateful for the opportunity to provide proactive feedback on these proposed Activity Centre plans. We thank you for considering this submission and look forward to continuing to work with the Department to address the issues raised.

If you would like to discuss any of the matters raised in this submission, please don't hesitate to contact UDIA Victoria's CEO, Linda Allison at [REDACTED] or UDIA Victoria's Director of Policy, Jack Vaughan, at [REDACTED]

Sincerely,



Jack Vaughan, Director of Policy
UDIA Victoria