



# Manningham Council Submission

Draft Activity Centre Plans  
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Interpreter service

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# 1. Introduction

This submission has been prepared by Manningham Council officers in response to the Phase 2 consultation in relation to the ten draft Activity Centre Plans prepared by the Department of Transport and Planning (DTP).

This submission is limited to the information that has been made publicly available on the Engage Victoria website, acknowledging that more detailed information has been confidentially shared with the Council's directly impacted by the draft Activity Centre Plans.

Manningham has been proactive in responding to recent engagement activities undertaken by the DTP on a number of planning reforms including the Plan for Victoria, Housing Targets and ResCode Reforms. The limited timeframes provided for consultation have not allowed for Council and the community to fully consider the implications and provide informed feedback. There is concern that these changes are rushed and have been developed without comprehensive strategic justification and may result in unintended consequences. In principle, officers are supportive of the objectives to increase housing density in and around Activity Centres. However, this submission raises a number of concerns in relation to the preparation of and limited consultation undertaken on the Plans, the walkable catchment areas and the supporting infrastructure.

## 2. Draft Activity Centre Plans

Whilst the exhibited draft Activity Centre Plans do not impact any activity centres or catchment areas within Manningham, there is significant interest in the directions, strategies and principles proposed in the plans, and the implications this has for two key strategies currently being prepared by Council.

In particular, Council is progressing the development of Activity Centre Design Guidelines which will apply to its nine Neighbourhood Activity Centres, as well as the preparation of a new Residential Strategy which will replace the existing Strategy, endorsed by Council in 2012. The key objectives and principles of the draft Activity Centre Plans in their current form, will have a significant impact on the work being progressed by Council, should these plans be implemented more broadly within other activity centres across Metropolitan Melbourne.

The ten draft Activity Centre Plans that form part of the pilot program seek to support an increase in housing supply and introduce a set of consistent built form standards in and around Metropolitan Activity Centres. The draft Plans represent a significant change in planning for growth around activity centres, especially in relation to the proposed walkable catchments.

Council is investing substantially in the development of residential and activity centre strategies for Manningham. These strategies are based on a rigorous assessment of neighbourhood character, built form and context, land capability, demographic and housing analysis. Importantly, these strategies are being informed by extensive community consultation. We urge the DTP to review its engagement processes to involve all councils as part of its activity centre planning. It is expected that collaboration with councils will add value to the work being progressed at the state level and is essential in achieving coordinated and effective implementation outcomes in all activity centres.

## 3. Walkable Catchments

We have reviewed the draft plans for Ringwood as this activity centre adjoins the Manningham municipal boundary. We recognise the important role that this and other Metropolitan centres

perform, and the need for increased housing growth, however, it is considered to be a very ambitious plan based on the extent of growth being proposed.

Over the past 18 months Manningham officers have undertaken extensive activity centre planning that could assist the work being undertaken by the DTP.

In particular, as part of determining the walkability catchment areas within Manningham's Neighbourhood Activity Centres, we have factored in a range of constraints that may have an impact on the feasibility, capacity and size of the catchment area. This analysis has had regard to the following criteria that may limit the development capacity within the catchment area:

- The subdivision pattern, and in particular curvilinear streets and court bowls.
- Roads with a width of 20m or less.
- Areas with a significant slope, featuring a gradient of 12.5% or greater.
- Areas affected by land management overlays including the Bushfire Management Overlay, Land Subject to Inundation Overlay, Special Building Overlay and Erosion Management Overlay.
- Areas within environmental and landscape overlays including the Environmental Significant Overlay, Significant Landscape Overlay and Vegetation Protection Overlay.
- Properties within the Heritage Overlay.
- Areas with a highly consistent character that need to be protected.

Encouraging significant increases in density within areas subject to land management and environmental overlays without any additional guidance creates conflicts in the planning scheme. This will set unrealistic expectations for the community and the development sector regarding future housing growth.

We have determined that a walkability catchment area of 400m, rather than 800m is a more appropriate distance and should be measured from the centre rather than the edge of an activity centre.

We are supportive in recognising the Ringwood Bypass as a physical barrier to pedestrian connectivity and the exclusion of Donvale from the catchment areas of the Ringwood Activity Centre.

## 4. Infrastructure Delivery and Planning Reforms

As identified in Council's recent submission to *Plan for Victoria* and the *draft Housing Targets (August 2024)*, there is a need to ensure that the impacts on infrastructure requirements and associated costs are considered in the delivery of growth areas. It is unclear from the plans what consideration has been given to the impact of housing growth on the need for additional infrastructure including open space, schools, health services, drainage, sewerage systems, the road network, commercial floor space, medical services, community facilities, public transport, cycling and pedestrian infrastructure improvements. It is also noted that there is currently no government primary school within the Ringwood catchment area.

Before these plans can be implemented, it is considered that several reforms at the state level need to be investigated and introduced into the planning system to remove barriers and provide clearer guidance in achieving more affordable and diverse housing outcomes. In particular, it is considered that the following matters should be addressed:

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

- A more simplified approach to developer contributions. How will the collected funds be shared between the State and Local Government? How will the State Government ensure that funds collected in an area be used in that area?
- Implications of the windfall gains tax if properties within the catchment are to be rezoned? Affected residents should be notified and consulted.
- There is no information on how a shorter amendment pathway and streamlined approval process will be facilitated. Will all amendments that support developments in and around activity centres be fast tracked? Will Council Amendments be fast tracked?
- Will town house style development be refused as an underdevelopment in the catchment area?
- Will there be minimum lot sizes and frontage requirements to achieve the proposed heights in the plan? What are the details of the planning controls to be implemented to achieve the proposed housing growth e.g. specific zones for the walkable catchment?
- What consideration has been given to the protection of significant trees?

## 5. Conclusion

In conclusion, given the significant implications of this work on all Activity Centres across metropolitan Melbourne, it is essential that a range of funding and delivery mechanisms are established by the State Government to ensure the continued delivery of vital open space, services and infrastructure to support a rapidly growing population.

The extent and number of major planning reforms without genuine consultation and engagement with Council and the community is a significant concern. We trust that Manningham will be involved with further consultation when planning controls have been drafted 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 and Liveability at [Andrew.Mcmaster@manningham.vic.gov.au](mailto:Andrew.Mcmaster@manningham.vic.gov.au).

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