

GLEN EIRA CITY COUNCIL

Submission to the Activity Centres Program Stage 2



GLEN EIRA
CITY COUNCIL

BENTLEIGH, BENTLEIGH EAST, BRIGHTON EAST, CARNEGIE, CAULFIELD, ELSTERNWICK,
GARDENVALE, GLEN HUNTLY, MCKINNON, MURRUMBEENA, ORMOND, ST KILDA EAST

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Acknowledgement of Country

Glen Eira City Council acknowledges the Boon Wurrung/Bunurong and Wurundjeri Woi Wurrung peoples of the Kulin Nation as Traditional Owners and Custodians, and pays respect to their Elders past and present.

We acknowledge and uphold Traditional Owner's continuing relationship to the land and waterways. Council extends its respect to all Aboriginal and Torres Strait Islander peoples.

Executive summary

Glen Eira City Council provides this submission in response to Stage 2 of the State Government Train and Tram Zone Activity Centres Program (the AC Program). This submission has been informed by officers' technical assessment, public comment presented at the engagement sessions and as received by Council, and discussions with the Councillor group.

Draft maps have been released which includes the centres of Caulfield, Glen Huntly, Ormond, Bentleigh and Elsternwick. The draft maps have two main components for each activity centre:

- An outline of the core, with proposed building heights of generally 6 to 12 storeys (and up to 20 in Caulfield).
- Inner and outer residential catchments within a ten-minute walk of the core, where land will be upzoned to allow 3-6 storey development depending on land size and distance to the activity centre core.

Council supports increasing housing in well-located areas and acknowledges that activity centres are appropriate places for growth. However, Council's **key concerns** relate to the **lack of transparency, evidence, and meaningful consultation** underpinning the AC Program, as well as specific issues with certain components of the draft maps, in particular, the detrimental impact on our valued heritage places and neighbourhoods.

The draft maps have been **released without technical reports, built-form modelling, or clear justification** for the height increases and extensive catchments. Many catchments are **inconsistently applied** and, in some cases, **extend beyond appropriate walking distances**. Furthermore, the catchments include areas **affected by existing and proposed heritage overlays, creating fundamental conflicts** between heritage protection and growth expectations. Council is also concerned about the **removal of policy consideration and third-party rights, the risk of overshadowing impacts, and the sidelining of Council-led strategic planning and long-delayed amendments**.

Overall, clearer guidance, consistent methodology, and genuine collaboration are needed before such wide-reaching changes proceed.

Our City

The City of Glen Eira is located approximately 10 kilometres southeast of Melbourne's central business district, and forms part of Melbourne's inner south-east region.

The municipality covers an area of 39 square kilometres and includes the suburbs of Bentleigh, Bentleigh East, Carnegie, Caulfield, Caulfield East, Caulfield North, Caulfield South, Elsternwick, Gardenvale, Glen Huntly, McKinnon, Murrumbeena, Ormond and parts of Brighton East and St Kilda East. Adjoining municipalities include the cities of Bayside, Kingston, Monash, Port Phillip and Stonnington.

Glen Eira's population is expected to reach 176,389 by 2036. Glen Eira is a diverse community made up of people with different backgrounds, culture, family type, age, and occupation.

Glen Eira City Council provides a wide range of services to its residents, including waste management, planning, building regulations, public parks, recreation facilities, libraries, and a range of community services. It also works closely with local businesses and community organisations to promote economic development and social wellbeing in the area.

Introduction

The State Government is undertaking the Train and Tram Zone Activity Centres Program (the AC Program) to deliver a planning framework to boost housing construction in and around 60 activity centres across Melbourne. A plan was put forward through its Housing Statement in September 2023 to address housing affordability through a series of planning reforms. Housing targets have been set for each local government area in Victoria, with Glen Eira needing a zoning capacity for 63,500 additional homes by 2051.

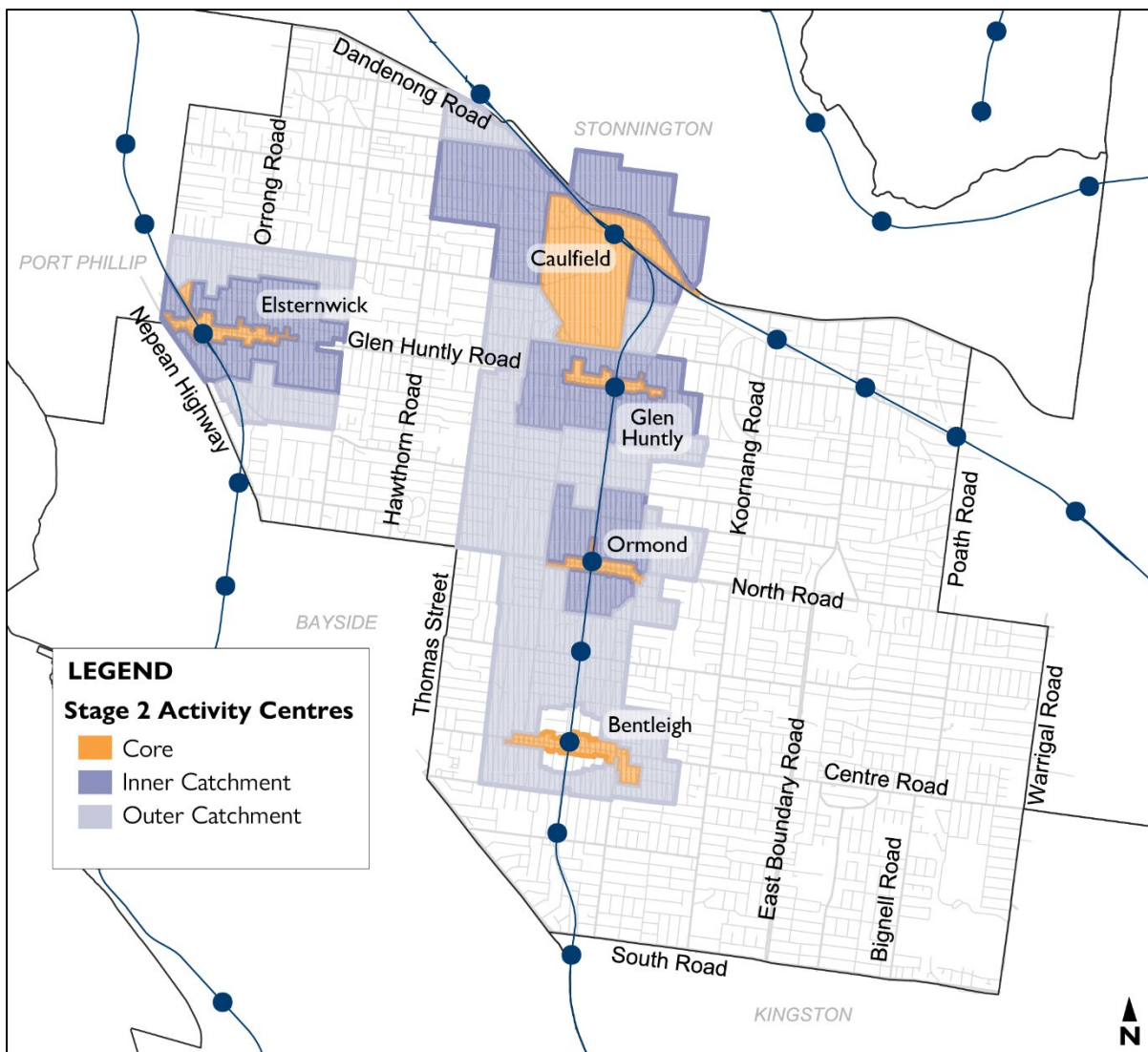
The AC Program is one of the ways the State Government is aiming to boost housing supply, by encouraging more homes to be built near train and tram lines, jobs and services. The Program implements a new overlay and zone into Planning Schemes. The Built Form Overlay (BFO) will apply to the commercial core areas and will set built form controls such as building heights and setbacks. The Housing Choice and Transport Zone (HCTZ) will apply to residential land in the activity centre catchment, generally around 800 metres from the core areas and will set building heights between 4 to 6 storeys in the inner catchment (HCTZ1) and 3 to 4 storeys in the outer catchment (HCTZ2).

There are four parts to the AC Program to plan for the 60 activity centres:

- i. 'Pilot' stage which involved ten activity centres including Chadstone and Moorabbin (completed)
- ii. 'Stage 1' which involves 25 activity centres including Carnegie, Murrumbeena and Hughesdale (due for completion early 2026)
- iii. **'Stage 2'** which involves 23 activity centres including Caulfield, Glen Huntly, Ormond, Bentleigh and Elsternwick (underway)
- iv. A separate process involving the local government areas of Melbourne and Yarra.

In total, nine of Glen Eira's activity centres are included in the AC Program. Council has made earlier submissions on the inclusion of the other activity centres under the Pilot and Stage 1 programs. This submission provides feedback on the draft maps released for Stage 2 which involves five of Glen Eira's activity centres.

Map 1 below illustrates the areas of Glen Eira impacted by Stage 2. The Pilot and Stage 1 areas are not shown on this map, but when combined with the Stage 2 areas, approximately half of the municipality is affected by the AC Program.



Map 1- Stage 2 Activity Centres in Glen Eira

Submission

Support for more housing

Council acknowledges the importance of increasing housing supply in and around activity centres close to transport, jobs and services. Additional housing supply and change is not an easy topic for government and the community to consider. These conversations are always challenging, because they sit right at the intersection of housing need and protecting what people value about where they live. However, concentrating population growth in and around activity centres encourages active and sustainable transport choices, helping to reduce car use and associated emissions. This has long been a fundamental principle of good planning and is central in our own strategic work. We support the intent to focus additional housing within our activity centres, particularly as four of the activity centres identified by the State Government align with those already prioritised by Council, being Caulfield, Glen Huntly, Bentleigh, and Elsternwick. Council has undertaken detailed structure plans and engaged extensively with our community in relation to the future growth of these centres. These structure plans struck a thoughtful balance between supporting growth and protecting local character.

Officers have advocated strongly for our adopted structure plans to be translated into the AC Program and are pleased to see that some of this has informed the basis of the draft maps. Though it is noted that a direct translation would have been more efficient and preferred.

The proposed heights in the core areas are generally supported subject to some specific concerns raised in this submission. It is logical for taller buildings and greater residential density to be concentrated in these areas. However, it is important to get the balance right between growth and heights, with the impacts on neighbourhood character, traffic, liveability and amenity – key concerns for much of the community. Clear, well-designed planning controls will give residents confidence about how their neighbourhoods will change over time.

Council also supports the use of surrounding catchments to accommodate additional housing, however, questions are raised regarding the extent of these catchments in some areas, where the proposed scale allowed under the new catchment zones appears disproportionate to local context.

Council supports growth where it is accompanied by the right infrastructure, including open space, community facilities, public realm upgrades, walking and cycling connections. Council supports the proposal to provide infrastructure in response to the proposed growth in our activity centres. Limited detail on the future infrastructure contribution mechanism has been released regarding how infrastructure can be provided and funded to support the proposed growth, this is detailed later in the submission.

The need for appropriate consultation and transparency

Council raises significant concerns with the process of the AC Program and how it has been conducted by the Department of Transport and Planning (DTP). Consistent with Council's long-standing approach, effective planning can only occur when it is undertaken in genuine collaboration with local communities.

Timing

The rapid pace of the AC Program highlights a clear inconsistency with the extensive but appropriate processes Council is obligated to undertake for comparable planning work. For example, a structure plan is first informed by community consultation and once the planning controls have been prepared, Council undertakes a comprehensive planning scheme amendment which includes public exhibition. It is essential that important steps are not bypassed or rushed, particularly when these plans will have such significant and lasting impacts on the future of our communities.

Meanwhile, the draft maps for Stage 2 of the AC Program were released in February 2026 and will be gazetted into the Planning Scheme by mid-2026. A four-month timeframe is far too short for considered planning and raises genuine concerns about whether community and Council feedback will be considered or incorporated.

There is no need for the AC Program to be undertaken in such haste. Council's *Housing Strategy*, adopted in November 2022, demonstrated that Glen Eira has more than enough capacity to accommodate the growing population to 2036 and beyond. There is no dispute that the proposed plans put forward by the State Government will create additional opportunities for more housing to meet the new Plan for Victoria housing targets, but these changes must be given the time to be properly considered. This is also relevant for the bombardment of planning reform that is being pushed through, with officers already raising issues of unintended consequences.

The timing of the announcement for the centres included in Stage 2 of the AC Program was also unfair. The Minister for Planning authorised Council to proceed with the Elsternwick Structure Plan Amendment C256glen in late 2024, so public exhibition was organised and commenced in February 2025. However, just two weeks later, the State Government announced its decision to take over planning for Elsternwick via the AC Program. Council had invested significant resources in notifying the community of the exhibition, including sending over 4,500 letters. Council's consistent requests to the State Government to confirm whether Elsternwick would or wouldn't be included in the program went unanswered which raises serious questions about the transparency of the program.

Consultation

Council has significant concerns with the consultation undertaken by DTP.

Phase 1 of consultation for Stage 2 occurred for just over a month in October and November 2025. This phase essentially sought feedback on what people valued about their activity centre. Generic postcards were sent by DTP to people living and working around one kilometre from the centres, though many in our community claimed this was never received. Two drop-in sessions were held by DTP and feedback could be provided via a short online survey. It is unclear how this feedback was genuinely used to generate the draft maps which simply show building heights and residential catchments.

Phase 2 involves the release of the draft maps for each centre, with consultation running from 11 February to 22 March 2026. In early-mid January 2026, small flyers again were letterbox-dropped by DTP to properties in and around the activity centres. At that time, Council received calls from the community confused because the flyer directed them to a website that stated consultation had closed. Officers could not provide much clarity to our community as we also

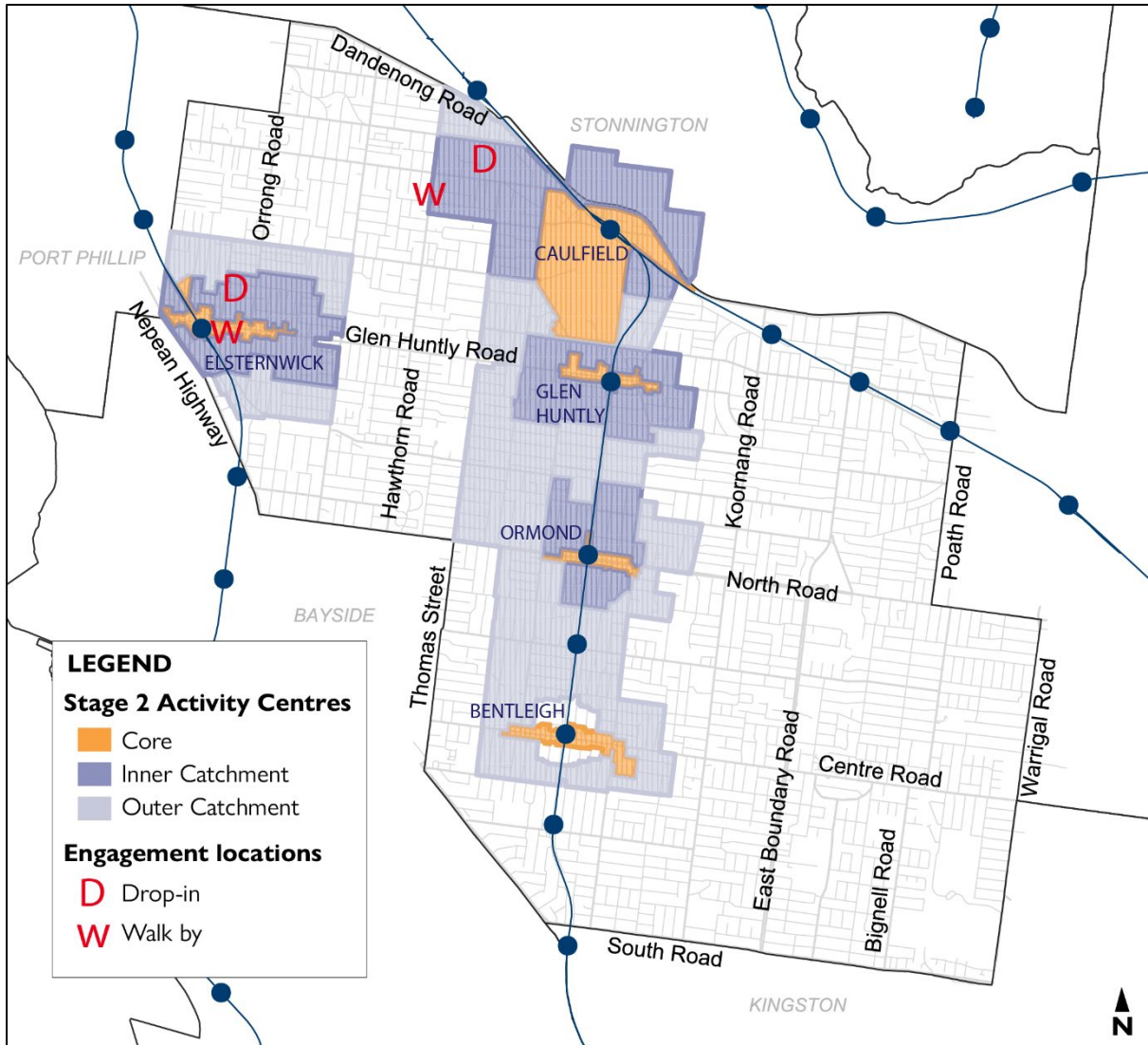
had a lack of information about when Phase 2 would commence. By the time consultation opened nearly a month later, many residents would have forgotten about it. The Engage Victoria website was also difficult to navigate for residents, and draft maps for each centre did not show the full extent of the catchments.

Without warning, Council was first made aware that the draft maps had been released through an ABC media post, rather than through any direct communication from the State Government. The ABC article was released at 7am and officers weren't advised until 2pm that day. We had to see what was proposed for our centres through the ABC article. This practice is unacceptable and not in the spirit of collaboration expected between state and local government.

During this last phase of consultation, the community could provide feedback to DTP by attending an online information session, an in-person drop-in session or walk-by, or through an online survey. There were two drop-in sessions and initially two walk-by pop-ups, the latter consisting of two DTP officers standing on the street for passers-by to approach, though these officers were not planning experts but instead from the communications teams only aiming to promote interest in the AC Program. This is not appropriate consultation.

Officers raised concerns with DTP about the locations of the drop-in and walk-by for the Caulfield to Bentleigh cluster, as they were located at the very northern edge of the cluster in Caulfield North, at peak hour. One resident stated that it took them half an hour to drive to the drop-in.

Map 2 below illustrates this point. Once the issue was raised a number of times, DTP advised that they would conduct another third walk-by at the Bentleigh shops. The limit of two drop-in sessions does not provide adequate cover to properly discuss the planning for five separate activity centres – four of which have detailed, Council adopted structure plans.



Map 2- Engagement locations for Stage 2

Officers also raised other concerns with DTP on its engagement program which did not get addressed once raised. The first drop-in session and walk-by was held on a Jewish Holiday, so many of those in our community would have been unable to attend. Additionally, the Engage Victoria website was not able to be translated into Russian and Hebrew, two of Glen Eira’s top languages.

The online survey gave the community limited opportunity to express their concerns. The questions appeared to be written to steer responses to a certain direction, for example the first question was “To what extent do you agree that we need to deliver more new homes close to jobs, services, and transport around Melbourne?” with one of five boxes available to tick from “strongly agree” to “strongly disagree”. Some questions allowed for written responses but had word limits. One of the questions was limited to a 50-word response to “Do you recommend changes to building heights in the core?”. As this section only allowed comment if “yes” was ticked, those who answered “no” had no opportunity to provide any explanation. Furthermore, the community were placed in the position of providing feedback on the maps without access to the full context, because of the lack of adequate background information supplied.

In all stages of the AC Program, Council has sought to receive detailed information regarding any of the community submissions and comments raised. To date, Council has only received the publicly available summaries of consultation. Therefore, important comments and issues raised by our community regarding these local activity centres cannot be considered by Council. We request this is provided upon completion of the feedback review.

It is disappointing that the short comings of the consultation on Stage 1 were repeated again in Stage 2.

Background Information

The lack of transparency from DTP has been extremely disappointing. We have and continue to advocate for critical information to be provided to the community and to Council. The draft maps have building heights for the core areas and delineates where the inner and outer catchments will apply. DTP have not provided the community with any technical reports to justify the heights, or proposed planning controls to understand how it will work. For example, whether a building will have a continuous 12 storey sheer wall from street level to the top floor, or if upper-level setbacks will apply. Our community has raised significant concerns with overshadowing of footpaths, impacts on residential properties to the south of future development sites and on open spaces. Unfortunately, this has not been addressed in the plans. This is particularly concerning given the controls proposed include exemptions from notice and review. If Council was exhibiting an equivalent proposal to the community, we would provide the draft planning controls and relevant background documents such as urban design analysis, transport studies, employment needs, and heritage reports.

We have also not been provided with critical information to provide appropriate feedback. For example, what controls would be included in the proposed BFO for each centre? Matters such as building setbacks, whether building heights are mandatory or discretionary, overshadowing controls, and others should be detailed. We had proposed specific winter solstice or spring equinox overshadowing controls for our centres after careful assessment of the local context, we would recommend these same controls be used.

The absence of technical reports makes it difficult to complete a full assessment of the proposal. DTP has advised that modelling has been undertaken to test the building heights, but this information has not been shared with Council. Given the lack of transparency, there are understandable concerns about the accuracy and reliability of the testing that underpins the draft plans.

Additional housing growth must be carefully considered in the context of infrastructure capacity constraints and the delivery and funding of new infrastructure by the State and Council. This has been a concern raised by our community. It is understood that DTP is drafting a new tool to collect infrastructure funding, but this wouldn't be operational until well after the new AC Program planning controls are gazetted. Proceeding with rezonings and increased development capacity ahead of establishing a clear infrastructure funding and delivery framework is poorly sequenced.

Critical information was also lacking in the communication supposedly sent to residents which failed to make it clear that rezonings were being proposed by DTP. The generic flyer simply stated that "your property may be affected by new planning controls." Several properties in Glen Eira have already been rezoned to the HCTZ under the Pilot stage of the AC Program, and there have been instances of Council officers having to advise owners that their land had been

rezoned. The website also makes it difficult to understand the implications of the AC Program and what the changes in zoning may mean for property owners. No clear explanations are given.

Overall, the inadequate notification, lack of transparency, and limited information provided by DTP raise serious concerns that many community members have not been given a genuine opportunity to participate in decisions that will significantly affect them. This will be compounded further by the deemed to comply approach of the new controls and the exemption from notice and review.

Council-led strategic planning

Council has already prepared detailed Structure Plans and associated planning controls for Caulfield, Glen Huntly, Bentleigh and Elsternwick. We had already planned for housing capacity through our Housing Strategy 2022. All were supported by expert input from urban designers, heritage professionals, landscape architects, transport planners and economists, and involved purposeful consultation with our community. All of this work was sitting with the Minister for Planning for authorisation to prepare a planning scheme amendment, but instead of progressing the amendments, the plans have been unnecessarily recreated by DTP which has caused confusion for the community. A direct translation of our work would have supported timely implementation of the State Government’s objectives.

Planning for our valued activity centres requires local knowledge, and the proposed plans do not reflect this. Heights appear to have been allocated across sites without proper consideration of the local context. For example, we had proposed a certain building height and setback to land north of the Bentleigh Library Plaza to protect it from overshadowing. However, DTP has proposed an additional 3 storeys with no explanation as to how such a height could feasibly maintain the required level of sunlight access to the Plaza. This work has already been completed by Council and should be carried across by DTP into the Bentleigh plan.

Table 1 below lists the amendments which Council has invested significant resources into, and which have remained with the Minister for Planning for years. While some will now become redundant and unlikely to progress, such as the Housing Strategy and Structure Plan amendments, we still list them all to highlight the significant work undertaken by Council.

Heritage amendments still awaiting a decision by the Minister for Planning are also listed and we continue to advocate for their progression. We are now placed in a position where we risk the loss of valued local heritage in Caulfield, Caulfield East, Glen Huntly, and Elsternwick because the proposed protection of these places has been sidelined while the Minister prioritises housing growth. DTP’s maps do not show any of the proposed heritage places, indicating they have not been considered. The onus will now be on Council to justify why heritage is proposed in areas DTP has designated for higher growth, despite the fact that this heritage work was submitted long before the AC Program was initiated. It is once again requested that the outstanding heritage amendments are promptly authorised.

Table 1 - Summary of Planning Scheme Amendments with the Minister for Planning

| Current Planning Scheme Amendment Applications | Date submitted to DTP | Outcome/Impact for Glen Eira |
|--|-----------------------|--|
| C237 – Carnegie Major Activity Centre | 11 August 2022 | Delayed significantly by Carnegie’s inclusion into the AC Program. Council’s |

| | | |
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| | | proposed built form controls will likely be translated into the AC Program controls in coming months. |
| C252 – Glen Huntly and Caulfield East Heritage | 25 May 2023 | Still on hold nearly three years later. We request it is promptly progressed. |
| C221 – Glen Huntly Major Activity Centre (including proposed heritage) | 30 November 2023 | Unlikely to progress, except for the proposed heritage parts of the amendment which we request is promptly progressed. |
| C256 – Elsternwick Major Activity Centre | 22 January 2024 | Unlikely to progress, but given that Council had publicly exhibited the amendment, most of Council’s proposed built form controls will likely be translated into the AC Program controls. |
| C255 – Housing Strategy | 4 March 2024 | Unlikely to progress. Significant costs incurred and extensive consultation carried out as Strategy was developed. |
| C257 – Elsternwick Heritage | 18 April 2024 | Still on hold nearly two years later. We request it is promptly progressed. |
| C245 – Caulfield Major Activity Centre (including proposed heritage) | 25 June 2024 | Unlikely to progress, included in AC Program, except for the proposed heritage parts of the amendment which we request is promptly progressed. |
| C262 – Bentleigh Major Activity Centre | 12 August 2024 | Unlikely to progress following Bentleigh’s inclusion in the AC Program. |

The State Government engagement material notes that the draft activity centre maps have been informed by the building heights contained within our adopted Structure Plans. Whilst this is not a direct translation, it does reflect the strong advocacy by Council during the development of the AC Program. It is noted however that a direct translation would have been more efficient.

Stage 2 Draft Maps - Core

This section of the submission discusses the proposed core areas for each centre, including the extent and the building heights. A separate section discusses the surrounding catchments.

General

The core is the central part of an activity centre, closest to public transport, jobs, shops and services. This area is best suited to accommodate more homes due to its proximity to services and its ability to accommodate greater building height and mass. The core boundaries have generally followed our Structure Plan boundaries which is a positive outcome. Nearly 5,000 Glen Eira properties are within the Stage 2 core areas.

The core is where the Built Form Overlay (BFO) will apply, which sets built form controls such as building heights, setbacks and street wall heights. It is disappointing that a draft BFO schedule for Stage 2 has not been provided. Therefore, Council is unable to provide a detailed response including commentary on the impacts of deemed to comply and discretionary standards.

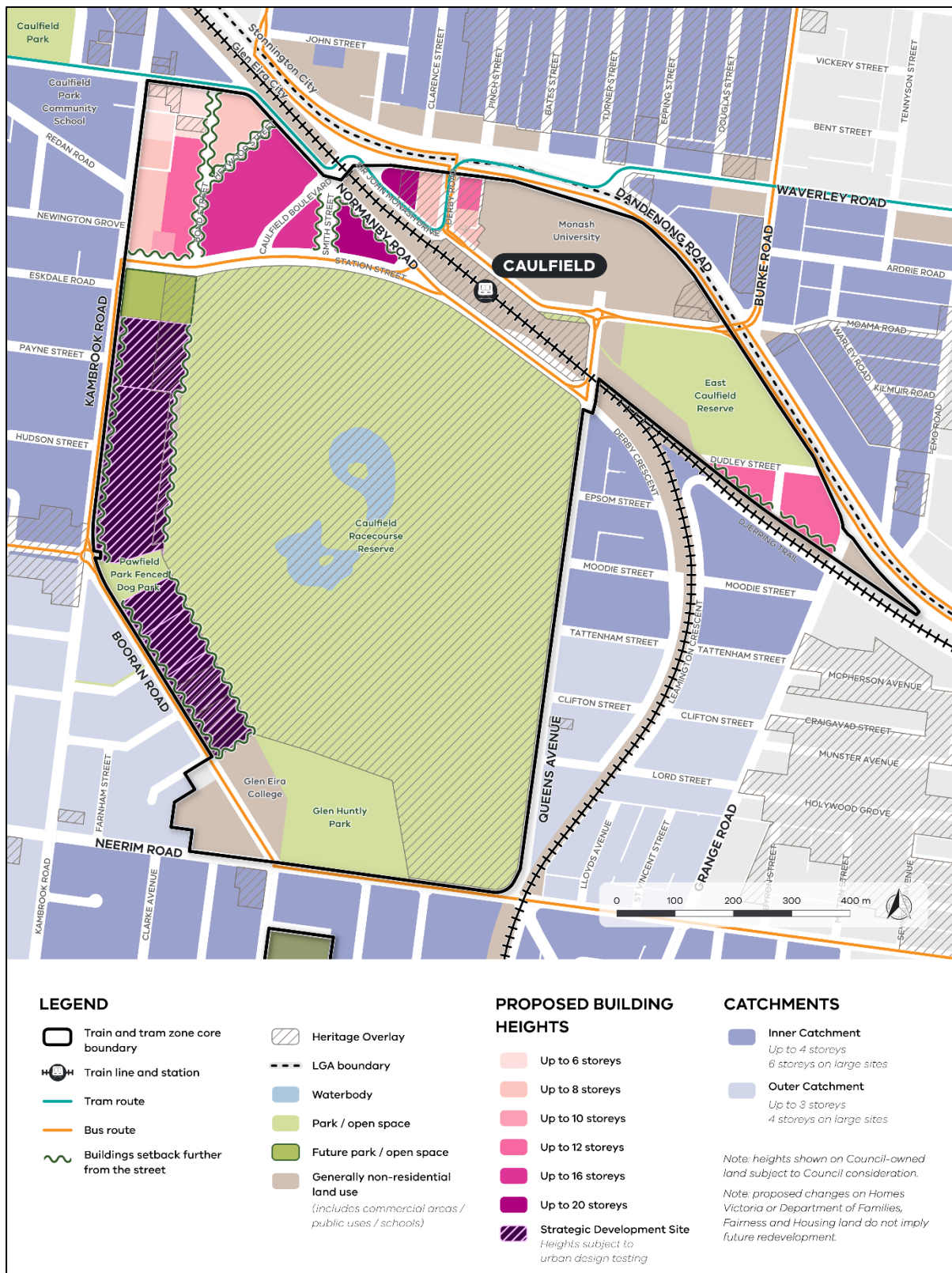
Additionally, the BFO removes third party appeal rights, unless the schedule to the overlay specifies otherwise. This means that any development application under the BFO, even if it was for 20 storeys, will not be advertised to neighbouring residents, nor can they make an objection or appeal a decision to the Victorian Civil and Administrative Tribunal (VCAT). Council is strongly opposed to removing third party notice and review rights, which are vital for maintaining community input in local planning decisions. Particularly when significant heights are proposed in these core areas adjacent to single storey dwellings. We submit that the schedules for our centres should 'turn on' notice and review rights.

The proposed heights generally follow a similar pattern through the core that Council identified in our Structure Plans, albeit with some height increases. It is acknowledged that Council has not completed a Structure Plan for Ormond. The proposed height increases are generally supported subject to minor changes. This is on the basis that the core is considered better suited to more change than the surrounding residential catchments.

As outlined earlier in this submission, crucial details have been omitted which makes it difficult to provide comprehensive feedback on the draft maps. This includes whether heights are mandatory or discretionary, overshadowing controls for footpaths and public open spaces are included, and setback requirements. Our Structure Plans had nuanced setbacks for different areas depending on the local conditions. This ensured that buildings would minimise impacts to adjoining properties (particularly to the south of development opportunities) and when viewed from the public realm.

Caulfield

The proposed core boundary and building heights for Caulfield are shown on Map 3 below.



Map 3 - Caulfield Core Boundary and Building Heights

The boundary of the proposed core area is the same as the Caulfield Structure Plan which is supported.

The proposed heights follow a similar pattern though the Structure Plan recommendations were more responsive to local context. Rather than one height across a whole block, we had gradual heights which were based on urban design analysis, heritage and development feasibility considerations. Put simply, the heights got higher as you got further back from the street. We submit that this graduation should apply.

Kambrook/Balaclava Road residential precinct

It is recommended that a maximum of 6 storeys is applied to the land along the section of Kambrook Road north of Station Street, Balaclava Road and Normanby Road. This would be more appropriate from a strategic perspective, given its residential context. Additionally, a zero-metre front setback in this setting would be inappropriate. A five-metre landscaped setback would be more suitable as per our Structure Plan.

Caulfield Village

We question whether the Caulfield Village land will be subject to the BFO. This area is currently zoned Priority Development Zone and its development is guided by an incorporated document in the Planning Scheme. It is unclear, and to date DTP has not been able to explain how the AC Program proposes to deal with the complex controls currently applying to the site. We also note that the heights are significantly higher than what is currently allowed and question the built form analysis undertaken to ensure no unreasonable overshadowing or wind tunnelling occurs and adequate daylight can be maintained throughout that development.

Derby Road

Council's Structure Plan heights should be reflected for the heritage Derby Road shops where proposed development would be graduated to protect the historic streetscape. This heritage area is historically significant at the metropolitan level as a predominantly Edwardian shopping centre associated with the Caulfield Racecourse and having a distinct urban form determined by its short length. The diversity of its substantially intact street architecture also makes it aesthetically significant and should continue to be protected through appropriate controls.

Dudley and Gibson Street triangle

At the southeastern edge of the activity centre, the triangular block between Dudley and Gibson Streets, north of the train line, is proposed to be 12 storeys rather than 9 storeys as per our Structure Plan. We are concerned with the visual and overshadowing impacts this would have on residential properties to the south and submit that 9 storeys is more appropriate.

964-972 Dandenong Road & 4 Grange Road (triangular site east of Grange Road)

We question why the property at 964-972 Dandenong Road & 4 Grange Road which is included in the core boundary, is shown as '*generally non residential land use*' on the Draft map with no building height applied. A current application under the State Government's Development Facilitation Program (DFP) proposes to rezone the land to the Commercial 1 Zone to accommodate a 10-storey mixed use application containing a large residential element.

The land is currently within the Industrial 1 Zone, however in the Structure Plan it is identified for rezoning to facilitate mixed use development to a height of 9 storeys. Why would a building

height not be considered or applied to this site given the guidance in the Structure Plan and the fact that DTP would have been aware of the Development Facilitation Program (DFP) application for a 10-storey building on this site? We question the transparency of the program in this regard and the missed opportunity to address this site in the program rather than separately.

We also note this site was identified in the outer catchment for the Carnegie cluster. We reiterate that the land should not be inadvertently rezoned HCTZ under that cluster as this would severely limit the development potential of the site.

Strategic Development Site – extending along Kambrook Road and Booran Road

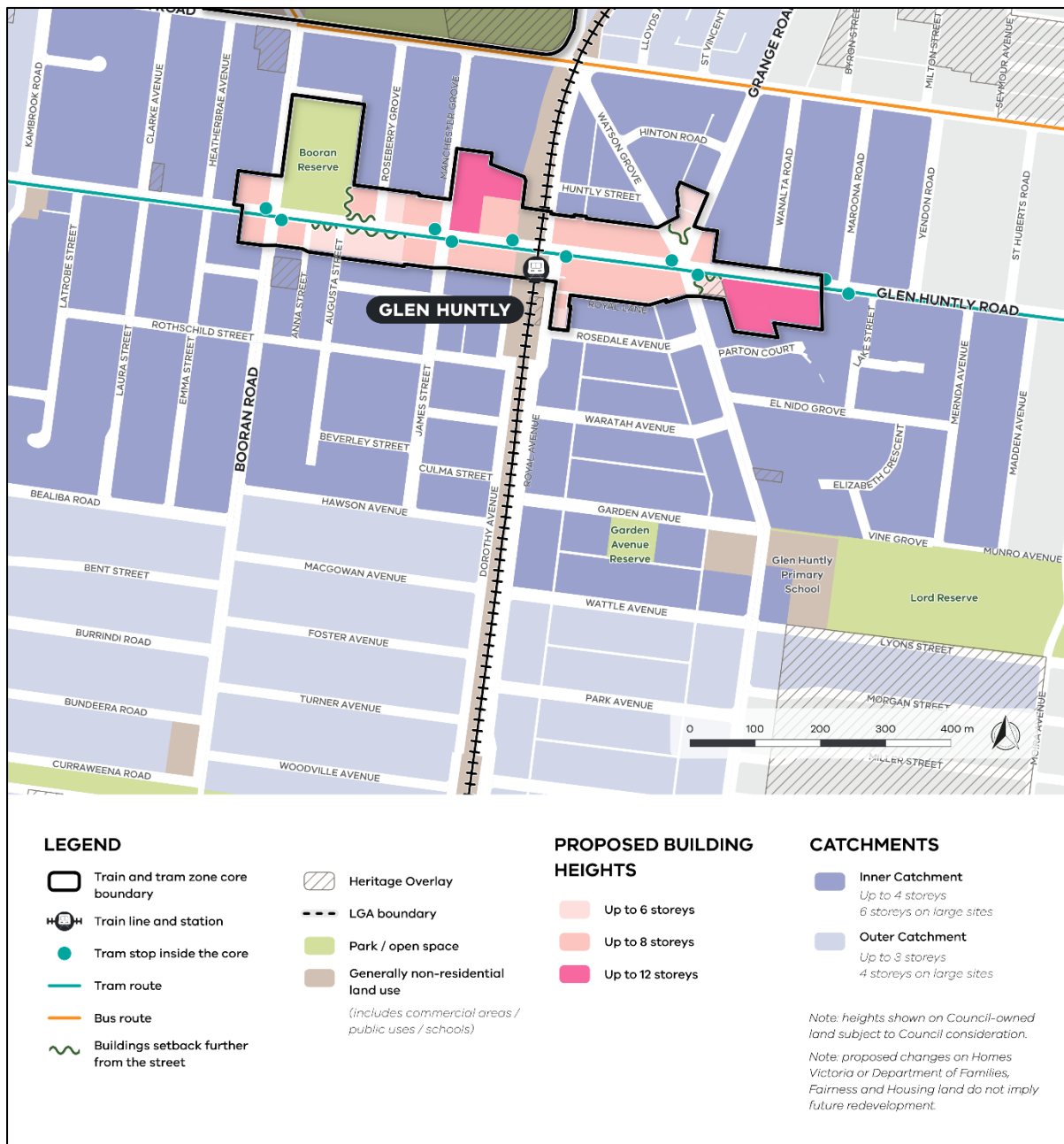
The Strategic Development Site extending along Kambrook and Booran Roads is void of any building height guidance. This is extremely disappointing given that the adopted Structure Plan included building heights for this site which were informed by detailed built form and urban design analysis.

Building heights and setbacks adopted under the Structure Plan provide a significant change in building scale to accommodate additional housing, whilst respecting the streetscape and amenity of neighbouring residential neighbourhoods, public open spaces and places of heritage significance. It is disappointing that this work appears to have been ignored with the draft map indicating that building heights will be subject to further urban design testing.

Additionally, the only direction for the land is the inclusion of seemingly arbitrary landscape setbacks along the edges of the site. Council's Structure Plan was widely consulted upon and it is disappointing that it appears that the community will be locked out of future discussion about the built form aspects for this site. Council requests that the controls include requirements for a transitioning of building height from Kambrook and Booran Roads to the rear of the site, and that the heights and setbacks respect the existing heritage places on Booran Road within this site.

Glen Huntly

The proposed core boundary and building heights for Glen Huntly are shown on Map 4 below.



Map 4 - Glen Huntly Core Boundary and Building Heights

The core boundary of the activity centre aligns with the Glen Huntly Structure Plan which is supported.

The proposed building heights are generally acceptable subject to minor adjustments. In some instances, heights could be increased, particularly along the northern side of Glenhuntsly Road where overshadowing can be better managed.

There doesn't appear to be any consideration of Council's proposed heritage overlays which were submitted to the Minister for Planning in May 2023. These properties are shown on the below map:



Map 5 – Proposed Heritage in the Glen Huntly Core

Council requests that appropriate heritage typology and height controls are included in the BFO for the proposed heritage shops. Council’s street wall heights and setbacks were developed based on built form and sight line testing. The proposed heritage overlay controls should be implemented at the same time as the BFO to ensure adequate protection of this heritage setting.

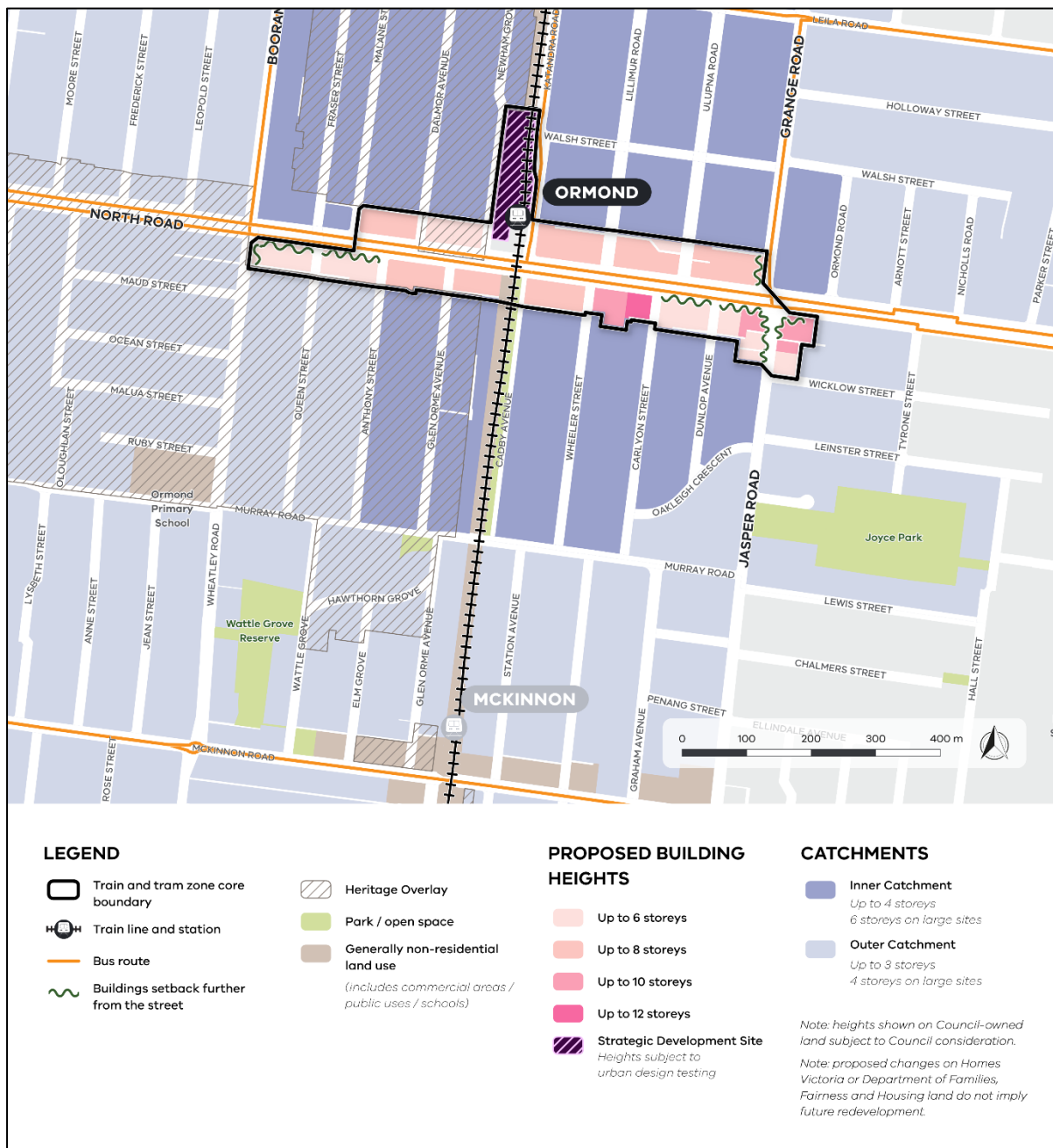
The heights for the proposed individually significant heritage overlays should be considered in the context of heritage. The draft maps use a squiggly line to demonstrate that some of these sites will have a street setback. We question why the same setback controls have not been applied to the proposed heritage properties at 1091 Glenhuntly Road and 2 Roseberry Grove. The deemed to comply approach will put the heritage of these buildings more at risk.

At the western end of the activity centre, a cluster of sites around the Glenhuntly Road and Booran Road intersection are proposed to be 8 storeys. We suggest that it is more appropriate for these sites to be 6 storeys to provide for a suitable transition. We also submit that these heights should not cast shadows on Booran Reserve during key hours on the winter solstice.

Council raises concerns with the impacts of a proposed 12 storey height for the land at 1232R Glenhuntly Road (i.e. located at rear of 1232-1234 Glenhuntly Road), abutted by 8 residential properties. Has a 12-storey building been modelled to assess amenity impacts such as overshadowing? Would 12 storeys still be achievable once the building includes setbacks to manage overshadowing? Without clear controls that show reasonable height transitions to the neighbouring inner catchment, the merits of this proposal cannot be supported.

Ormond

The proposed activity centre core boundary and building heights for Ormond are shown on Map 6 below.



Map 6 - Ormond Core Boundary and Building Heights

It is noted that Council has not undertaken a Structure Plan for Ormond which is identified under the current Glen Eira Planning Scheme as a Neighbourhood Activity Centre. The extent of the core boundary is generally acceptable, but we question why it doesn't include the petrol station site at 423 North Road.

The proposed building heights throughout the core do not seem to follow any logic. The expansive nature of the North Road road reserve lends itself to higher built form along the northern side of the centre and Council would encourage DTP to review this plan with this objective in mind.

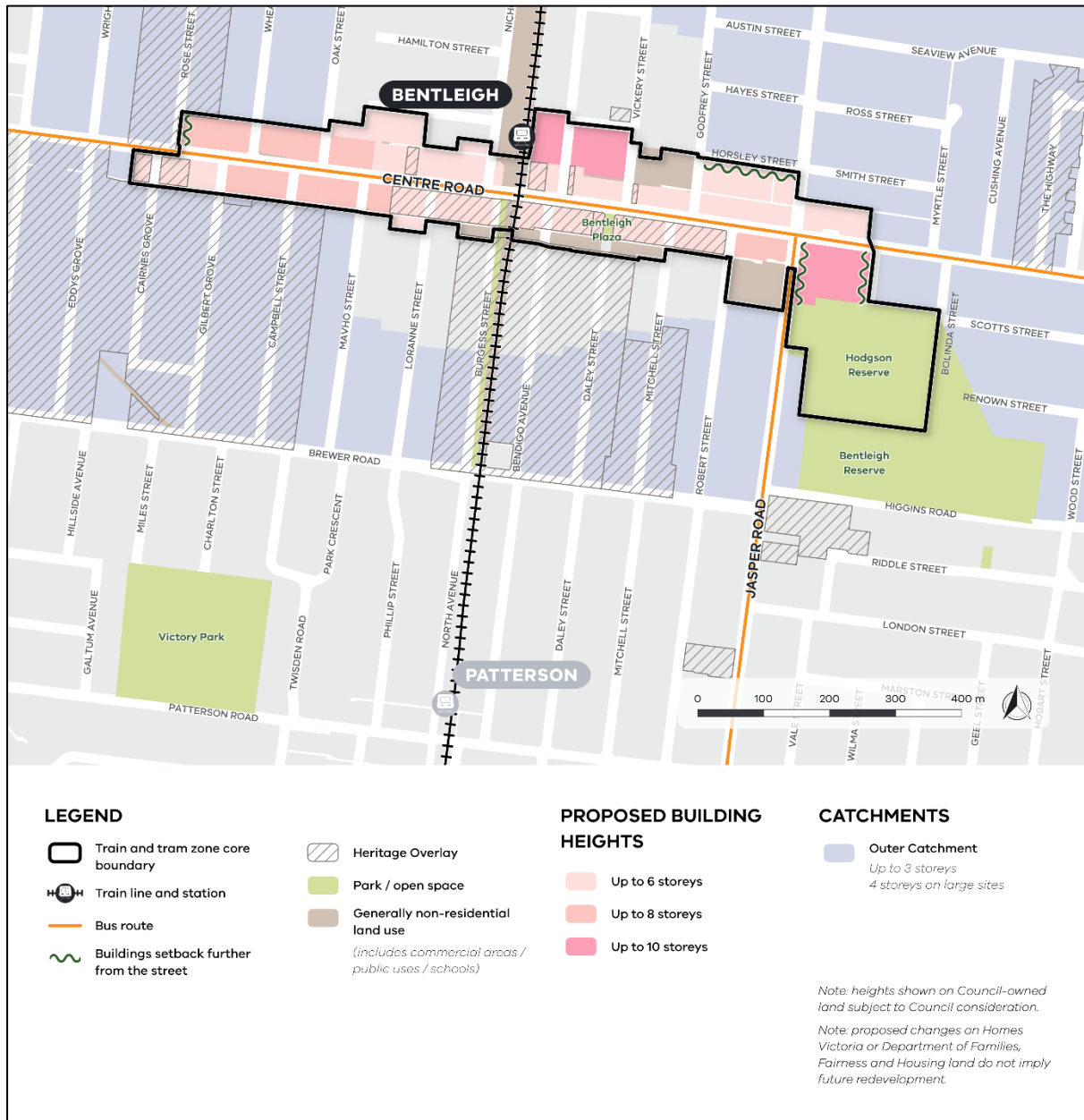
However, the draft maps show higher building height allowances up to 10 – 12 storeys for some sites located on the southern side of North Road where impacts from shadowing and loss of daylight would be much greater and likely. This is more surprising given the abuttal to a residential neighbourhood to the south. What is the justification for this height? Of particular concern is the application of 10 – 12 storeys for sites located between Wheeler Street and Carlyon Street, especially the 12-storey application to 600-604 North Road. It is not an overly deep site and we struggle to understand how a built form analysis could reasonably propose a 12 storey built form on this site. A similar situation exists for the 10-storey building at 578-598 North Road. Council would like to see how 10 – 12 storey building heights can work in these locations and the amenity impacts to adjoining low scale residential dwellings be managed. If this can't be demonstrated then the heights should be reduced.

Following on from this, we question the heights directly to the east of Carlyon Street, with only 6 storeys proposed. Why has the height been halved? While these properties are prevailingly single storey dwellings on residential zoned land within the core, there seems to be no logical explanation as to why the proposed height allowances differ so greatly from those sites to the west of Carlyon Street. This also applies to the building/landscaped setback shown for these properties. North Road should have a consistent active frontage with no street level building setbacks.

The proposed 10 storeys for the McDonald's site on the corner of North and Jasper Roads is generally appropriate for its context on a large intersection, but again we question whether amenity impacts have been considered for the adjoining residential properties to the east and south within the outer catchment.

Bentleigh

The proposed activity centre core boundary and building heights for Bentleigh are shown on Map 7 below.



Map 7- Bentleigh Core Boundary and Building Heights

The proposed core boundary generally aligns with the Bentleigh Structure Plan except for some minor variations. The boundary should be extended further north of the Council car park between Vickery and Godfrey Streets to reflect the actual boundary of the car park.

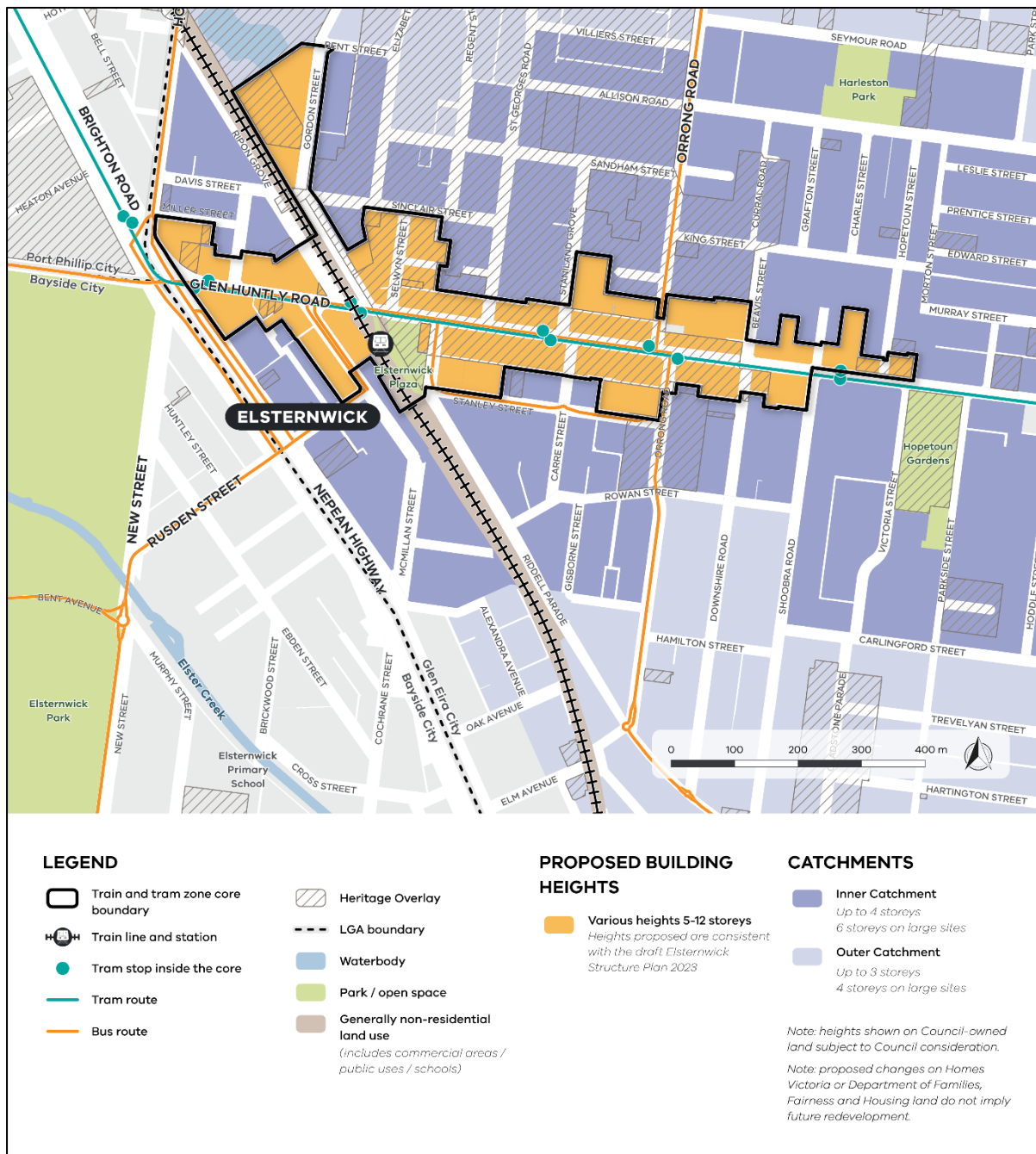
Council generally supports the heights in the Bentleigh core and suggests that the 6 storeys on the north side of Centre Road could be increased to 8 storeys, subject to adequate building setbacks to manage overshadowing to the southern footpath. Additionally, the proposed heights to sites located north of public open spaces are supported subject to adequate overshadowing controls as proposed in our Structure Plan. This includes protection to Bentleigh Reserve (and the memorial cenotaph) and the Bentleigh Library Plaza.

It is noted that building heights have been proposed for most of Council's car parks that are in the Public Use Zone, Schedule 6 (PUZ6). This zone restricts most land uses unless they are for local government purposes. It is assumed that DTP proposes to rezone these sites to a Commercial 1 Zone to facilitate future housing growth. While a change in use could be considered in the future, as highlighted in our Structure Plan, Council needs to undertake further investigations before confirming future land use options. Rezoning these sites is not supported and could likely result in windfall gains tax implications for Council. We strongly object to the imposition of this financial burden without confirmed plans for the sites which could include community facilities.

While most heights are supported, the proposed 6 storeys for the Telstra Exchange site at 39 Lorraine Street is inappropriate. The property is in a residential side street and is separated from the Centre Road shops by a laneway.

Elsternwick

The activity centre core map for Elsternwick is shown on Map 8 below.



Map 8 - Elsternwick Core

The core boundary generally follows the Elsternwick Structure Plan. It is noted however that Council’s proposed planning controls (Elsternwick Structure Plan amendment) did not include heights for the three car parks on Stanley Street and Staniland Grove. This exclusion was suggested by DTP at the time of drafting the Elsternwick controls. This exclusion should be reflected in the proposed BFO. Council has also not been advised of any rezoning of council owned land within the core and would want full disclosure and opportunity to comment on any

proposal to rezone Council owned land within the core. Council opposes any proposal to rezone Public Use zoned land.

The proposed building heights for Elsternwick were not shown, only a note saying that the heights would be consistent with the Elsternwick Structure Plan. This is because Council had already formally exhibited the heights and other planning controls to the community in 2025. Council would hope that these heights are directly translated, otherwise it raises questions about transparency and lack of proper consultation.

It is unclear whether Council's proposed interface setbacks and use of mandatory controls will also be translated into the new controls. These should be carried forward, with minor adjustments reflecting the public submissions Council received in 2025.

Stage 2 Draft Maps - Catchments

General

The catchment is defined as the area surrounding the core within approximately 10 minutes walk of public transport and services (around 800 metres). It aims to provide a transition in built form from the higher buildings in the core to the existing residential areas. This is the area where the Housing Choice and Transport Zone (HCTZ) will apply to residential land. The maps produced by DTP show an inner and outer catchment. The inner catchment will have the HCTZ1 control with building heights of 4-6 storeys, and the outer catchment will have the HCTZ2 control with 3-4 storeys. The higher of those heights only apply if the combined lots are “large lots” and have an area of at least 1,000 square metres and a frontage of at least 20 metres. Council is generally supportive of the principle of directing modest housing growth to catchments, however, raises some serious concerns as follows.

Nearly 20,000 Glen Eira properties are within an inner or outer catchment for Stage 2. The proposed catchments are overall considered to be excessive and inconsistently applied as discussed below. There also does not appear to be a distinct catchment for each centre, but one endless catchment in many directions. The maps produced by DTP are also misleading, as they do not show the catchments from the other stages of the AC Program, some of which directly adjoin the Stage 2 catchments. It is also noted that there are areas of stark transitions from the inner catchment to an existing 2-storey zone. Council also raises concerns with overshadowing to local parks, all of which will be further discussed below.

The extent of the catchments is inconsistent with DTP’s new car parking requirement maps for new developments, known as Car Parking Requirement Maps, implemented via Amendment VC277 on 18 December 2025. The maps divide land into one of four categories based on access to public transport. Land closer to public transport is in a higher category and can provide less car parking. The proposed inner and outer catchments include many sites in the lower categories of the car parking requirements, which is a problematic contradiction considering both maps are created by DTP. There is clearly an inconsistency that has not been rationalised.

The proposed catchments will result in a significant amount of land being upzoned from a 2-storey Neighbourhood Residential Zone to a 3-6 storey zone (HCTZ). This change brings not only increased height allowances but also a shift to a zone that no longer includes a mandatory garden area requirement and permits higher site coverage (70% compared with 60% in the NRZ). Alongside the recent ‘deemed to comply’ planning reform which reduced other controls like street setbacks and private open space sizes, Council is seeing larger side-by-side townhouses in the HCTZ. The State Government has removed Council and VCAT’s ability to consider policy and the purpose of the zone, so effectively, if the numerical numbers are met (such as site coverage, street setback, etc.), it is automatically approved.

We acknowledge that DTP is trying to direct more housing to the HCTZ areas, but because Council is now unable to consider local policy and the purpose of the zone, there is no mechanism to effectively refuse underdevelopment. This issue has been consistently raised and needs to be addressed before more land is rezoned.

Furthermore, developments of up to 6 storeys for east/west orientated sites will effectively remove all access to sunlight for existing dwellings to the south. Is DTP supportive of the reduced amenity and environmentally sustainable design provisions for such dwellings? There

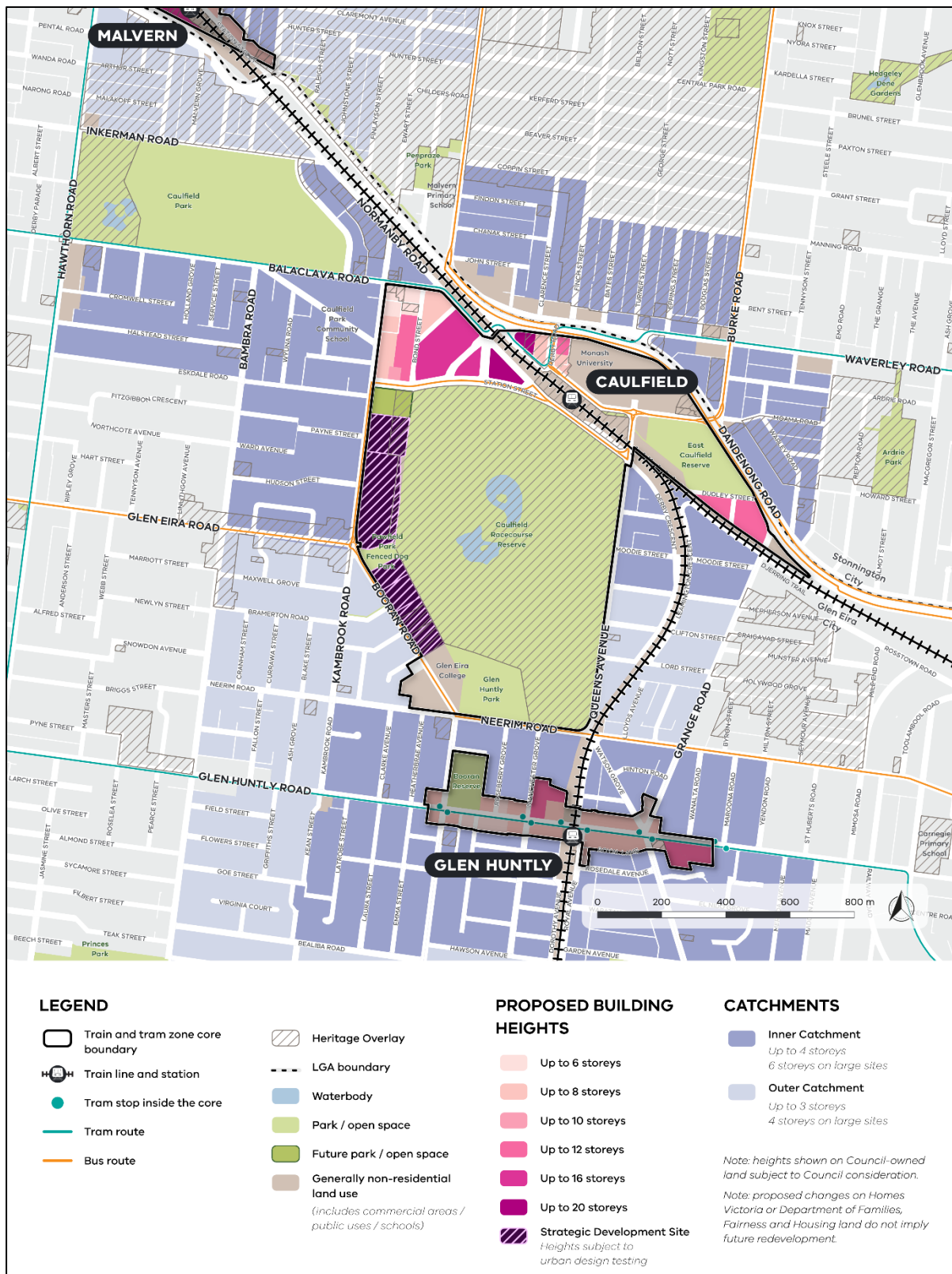
needs to be a better balance between density and amenity, particularly in areas with poor access to public open space such as Elsternwick for example.

We also raise concerns about how tree canopy cover will be affected when combined with the level of densification envisaged by the State Government. Council's *Climate Emergency Response Strategy 2025–2029* states that Glen Eira is one of Melbourne's most heat-vulnerable municipalities due to a combination of high urban density, low tree canopy cover, and an ageing population. Without urgent action to increase tree canopy cover Glen Eira risks more extreme localised heat and poorer liveability. The *Glen Eira Urban Forest Strategy* aims to increase our tree canopy cover from 12.5 per cent to 22 per cent by 2040. We are concerned that the upzoning of land in the proposed catchments will lead to the replacement of well-vegetated residential lots with large developments with greater site coverage and less permeability that leave little space for appropriate plantings.

Council also notes that many of the catchment areas are impacted by new flooding risk maps publicly released by Melbourne Water. It is not clear how the AC Program has considered these implications.

Caulfield

The proposed catchments for Caulfield are shown on Map 9 below.



Map 9 - Caulfield Catchments

It is noted that this map is misleading, because the land to the east of Grange and Yendon Roads is also within a catchment from Stage 1 of the AC Program. This is a common issue with the draft maps and does not provide the community with a rounded and complete understanding of the changes they can expect to their immediate and broader neighbourhood.

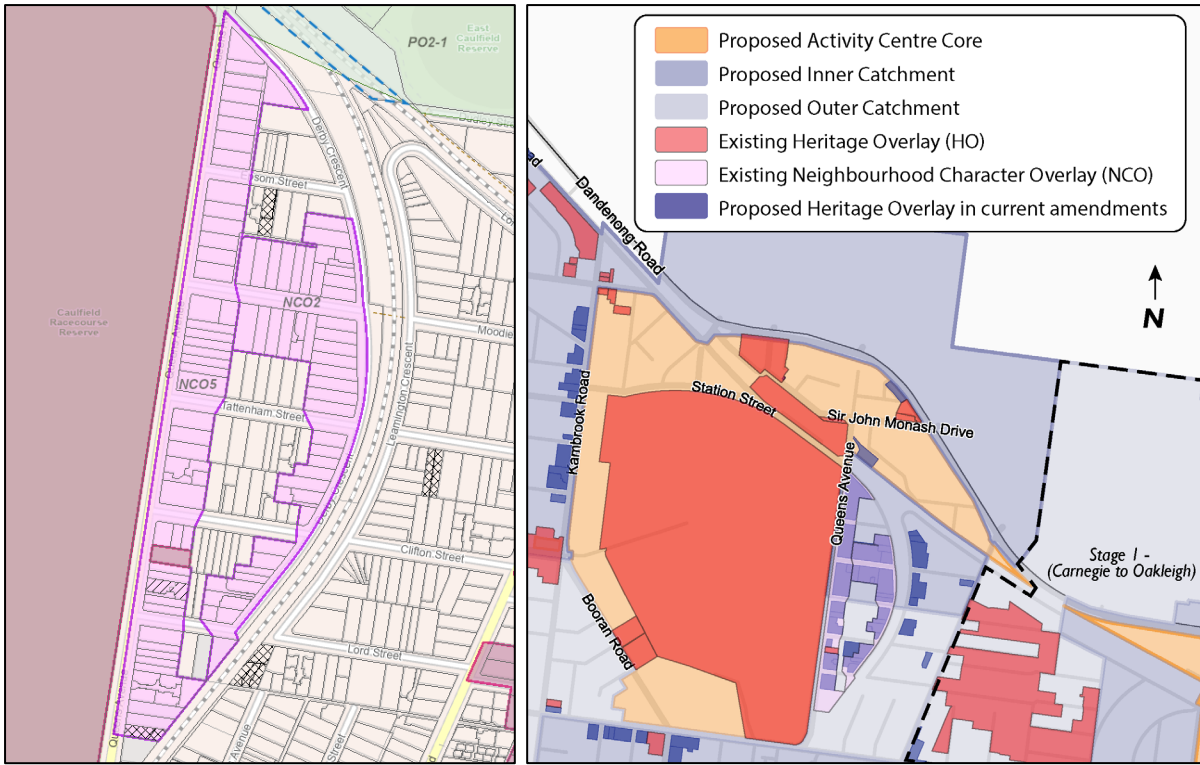
The inner catchment for Caulfield is excessive in some areas. The block west of Bambra Road includes properties that are over 1.7 kilometres to the station. If it was chosen because this area is close to trams, local shops and Caulfield Park, why hasn't the same principle been applied to other areas, such as near Waverley Road within Stonnington? The application of the inner catchment also would result in an abrupt transition to a 2-storey zone, particularly along Eskdale Road. This area may be better suited to the outer catchment. The lack of information provided as part of the consultation material to support/explain the application of the catchment areas is considered poor. The inner catchment to the west of the centre should cease at Bambra Road.

The application of the catchments does not appear to account for significant physical barriers, such as poor pedestrian access via the rail underpasses (Smith Street and Queens Avenue), and the ten-lane Dandenong Road restricting access from the north. Other centres have applied these same accessibility principles to exclude land from catchments, and this inconsistency needs to be addressed.

We are also concerned about whether any traffic analysis has been undertaken to assess road capacity and determine if the surrounding road network, particularly around Queens Avenue, can support higher-density development.

Council is concerned that the catchment mapping does not recognise proposed heritage overlays identified through the Caulfield North and Caulfield East Heritage Reviews. Nor does it account for the existing neighbourhood character overlays (NCO), heritage overlay precincts or individually significant properties.

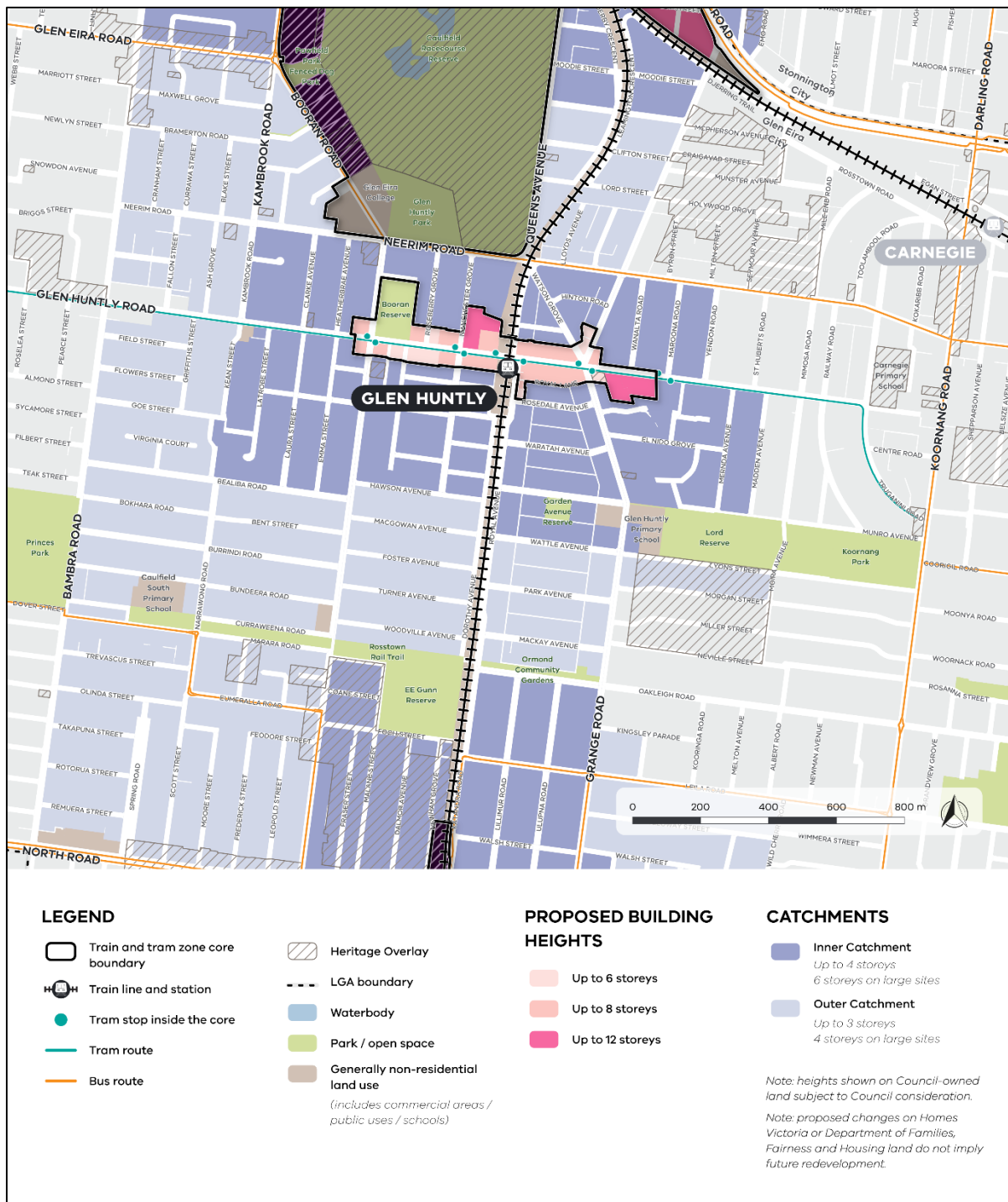
In particular, Council is concerned by the designation of the inner and outer catchment to land currently in an NCO and proposed to be included in a heritage overlay. There are two proposed precincts known as the Queens Avenue Precinct and the Railway Corridor Precinct as shown on Map 10 below. The properties along Queens Avenue have interesting historic links to the Racecourse where many horse trainers, owners and jockeys lived and had front balconies or upper floor attic style windows to gain a view of the Racecourse from their homes. The proposed boundary between the inner and outer catchment areas appear to arbitrarily cut across the middle of these proposed heritage areas, meaning half is in the inner and half in the outer catchment. This would have a significant impact on the significance of these precincts if it stays split. Our position is that land in a current or proposed heritage overlay should not be upzoned to the inner or outer catchment, as this would create conflicting planning objectives discussed later in this submission. Should the Minister disagree with this reasonable position, then, at the very least, we submit that the majority of this area be in the outer catchment of the Caulfield Activity Centre.



Map 10 – Queens Avenue and Railway Corridor NCO/Proposed HO and catchment areas

Glen Huntly

The proposed catchments for Glen Huntly are shown on Map 11 below.



Map 11 - Glen Huntly Catchments

The proposed outer catchment appears to extend further west than it does east, however, land to the east is already proposed to be within the catchment of the Carnegie Activity Centre Plan which formed part of Stage 1 of the AC Program. This creates a continuous inner and outer catchment from Glen Huntly all the way to Oakleigh. There is also a continuous catchment from Caulfield down to Bentleigh. This will result in significant change over time to these residential

areas. The western extent of the outer catchment to Bambra Road at 1.2 kilometres from the station is excessive given core services are located closer to the station rather than spread across Glenhuntly Road.

Council queries whether road capacity has been considered when applying these catchments.

Council also questions whether fragmentation has been considered. The proposed inner catchment to the south-east of the station is predominately comprised of smaller units and apartments. Such conditions significantly reduce the likelihood of redevelopment.

With the potential for 6-storey buildings to be developed north of Booran Reserve, Gordon Avenue Reserve and Lord Reserve, we raise concerns about overshadowing to these open spaces. Council questions how this will be managed through planning controls, such as the HCTZ or deemed to comply standards.

Council also raises concerns with the application of the inner and outer catchment on land proposed to be in a heritage overlay around Glen Huntly. The implications of this issue are addressed in detail in a later section of this submission, where Map 16 shows the proposed heritage in Glen Huntly. It is of particular concern however to split the proposed Dorothy Avenue Precinct between the inner and outer catchment. Having two different height limits would impact the significance of the precinct. As mentioned previously, our position is that existing and proposed heritage sites should not be in the catchment and upzoned, but should the Minister disagree, Council suggests all of the proposed precinct is within the outer catchment. It is also noted that part of the Glen Huntly Park Estate and Environs heritage precinct is on the edge of the proposed catchment (Lyons and Morgan Streets, west of Moira Avenue). At the very least, this precinct should be removed from the catchment given its edge position and distance to the core. It is poor planning to have part of a heritage precinct in a different zone with different objectives.

Ormond

The proposed catchments for Ormond are shown on Map 12 below.



Map 12 - Ormond Catchments

The application of the catchments around Ormond appears to be inconsistent. Council questions why the catchment extends further west on the north side of North Road than the south (west of Scott Street). This is extensive, for example a resident in Trevascus Street, Caulfield South (located in outer catchment northwest of core) would have to walk over 1.3 kilometres to the edge of the shops, or 1.7 kilometres to the station.

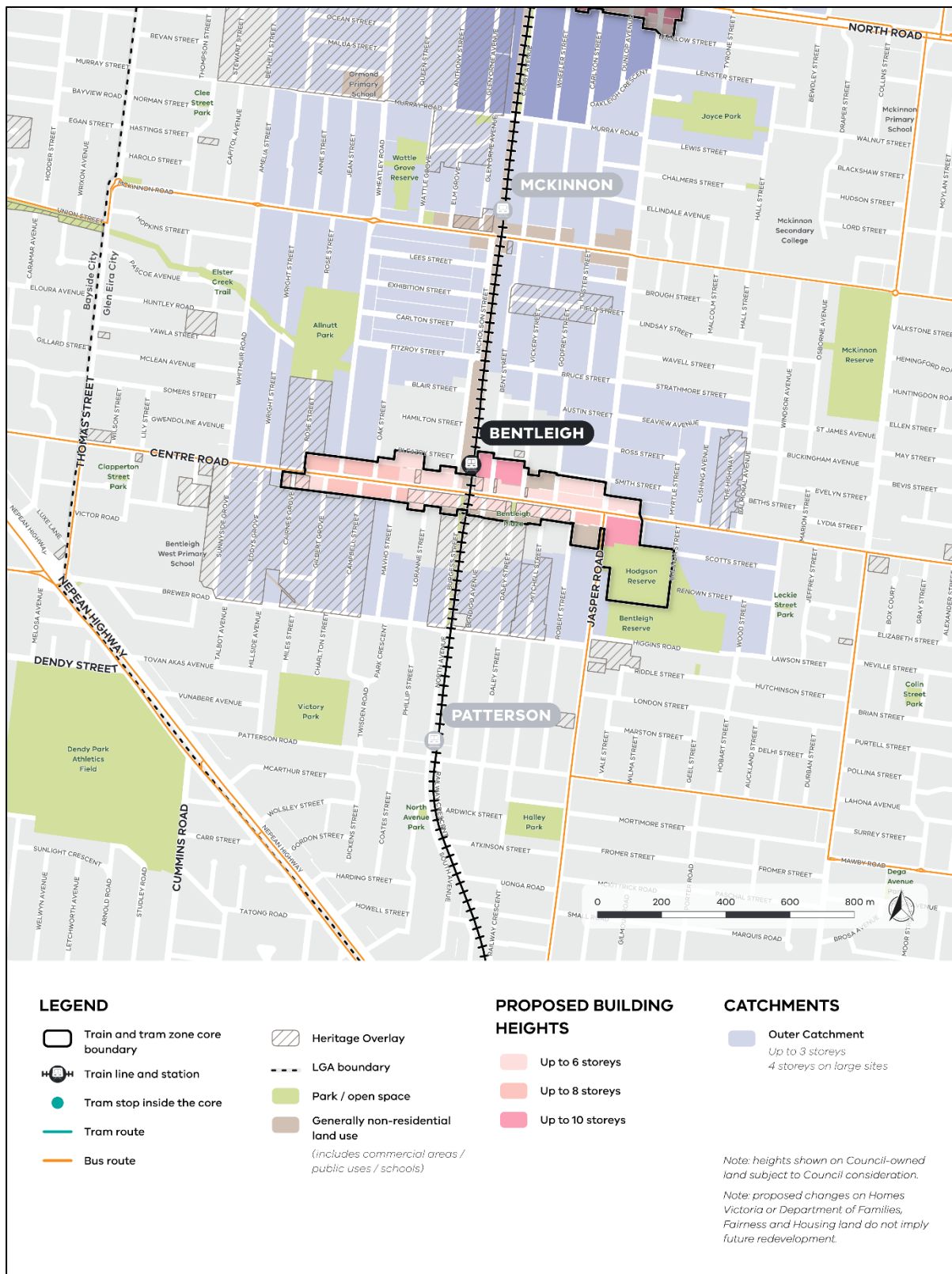
Furthermore, the block south of Murray Road and west of Wheatley Road, which includes land up to Amelia Street in McKinnon is also considered unnecessary and should be removed from the catchment due to the distance from the core. The inclusion of McKinnon in the Ormond catchment is not justified, nor was this communicated adequately to residents. Again, there appears to be a bias towards extending the catchments to the west which is not clearly backed by a clear methodology other than using conveniently located north/south roads to define the boundary on a map.

It is also questioned why the catchment extends further east on the north side of North Road than it does on the south side. Overall, Council submits that the same principles should apply when determining catchment boundaries.

Council is also concerned with the proposed upzoning via the application of the inner and outer catchment to the Ormond and Environs Heritage Overlay precinct. The implications of this issue are addressed in detail in a later section of this submission.

Bentleigh

The proposed catchments for Bentleigh are shown on Map 13 below.



Map 13 - Bentleigh Catchments

The application of the catchments for Bentleigh is different to the other centres. There is no inner catchment proposed, and it is assumed the current 4-storey Residential Growth Zone will be retained instead.

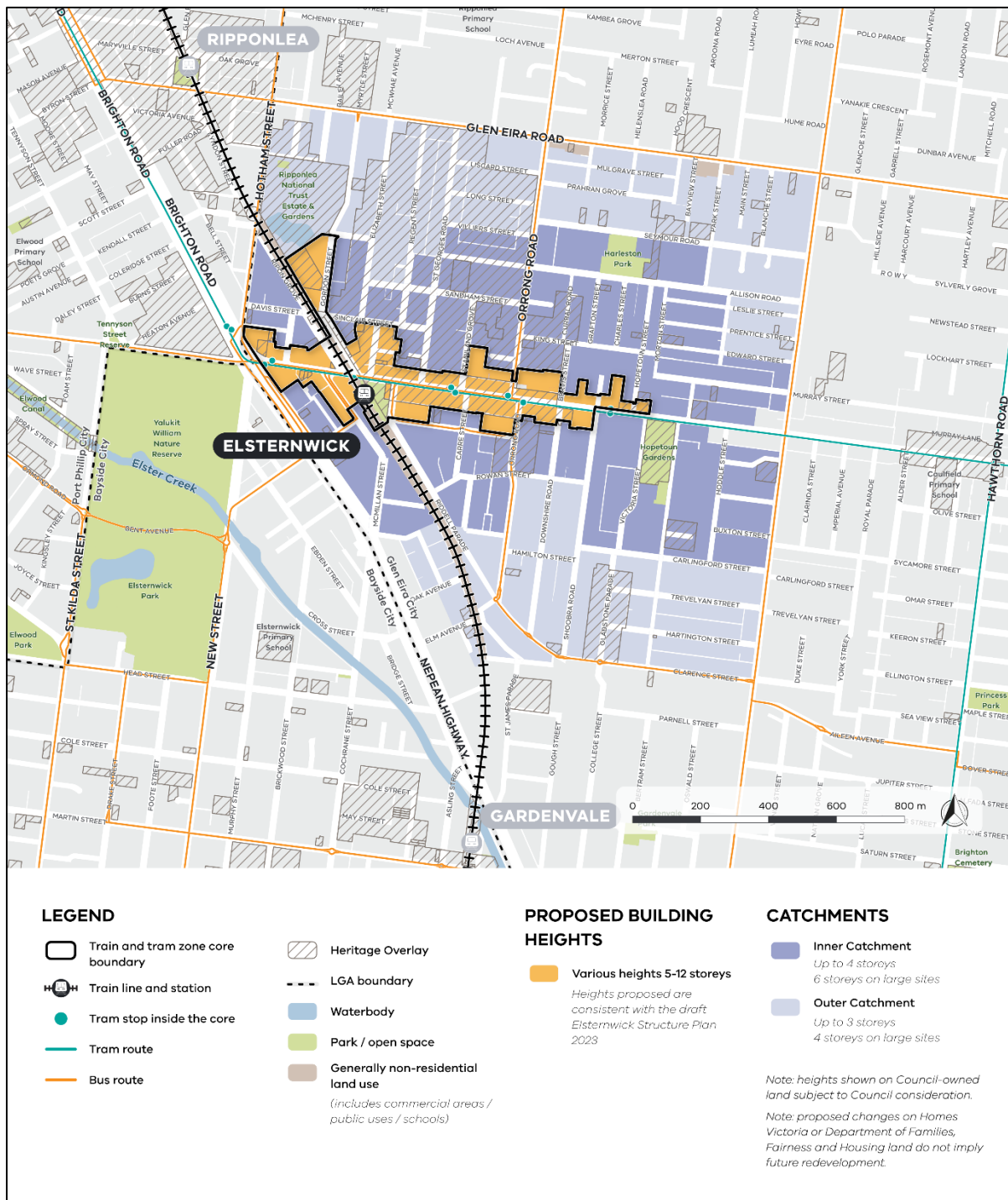
For a long time, Council has designated Bentleigh as a 'Major Activity Centre', the highest tier in our activity centre hierarchy. However, Plan for Victoria, released by the State Government in February 2025, introduced new state-wide activity centre designations and downgraded Bentleigh to a 'Neighbourhood Centre'. No justification was provided for this demotion, particularly given the State's objective to deliver significantly more housing. We query how its characteristics differ from other now higher tier centres such as Ormond. This creates an inconsistent approach to the AC Program when our other centres are expected to accommodate a greater share of growth.

It is noted that the catchment only extends approximately 400 metres south of the shops yet reaches nearly twice the distance to the north. If McKinnon Station is used as justification for why the northern part is included, why hasn't the same principle been applied to the south where Patterson Station is located? The land west of Wheatley Road and north of Beech Street is a significant distance to the Bentleigh core. It is submitted that the catchment should have a consistent approach around Bentleigh and be reduced in the northern parts. The AC Program needs to explain why Patterson has not been included, more transparency is needed.

As discussed in the other catchment sections, we submit that heritage properties should not be located with the activity centre catchments and upzoned as a result of this, whether it be inner or outer catchment. This includes the Bentleigh Heights Estate heritage overlay precinct (at The Highway) which is located at the very edge of the proposed outer catchment. We question why the catchment didn't stop before this precinct.

Elsterwick

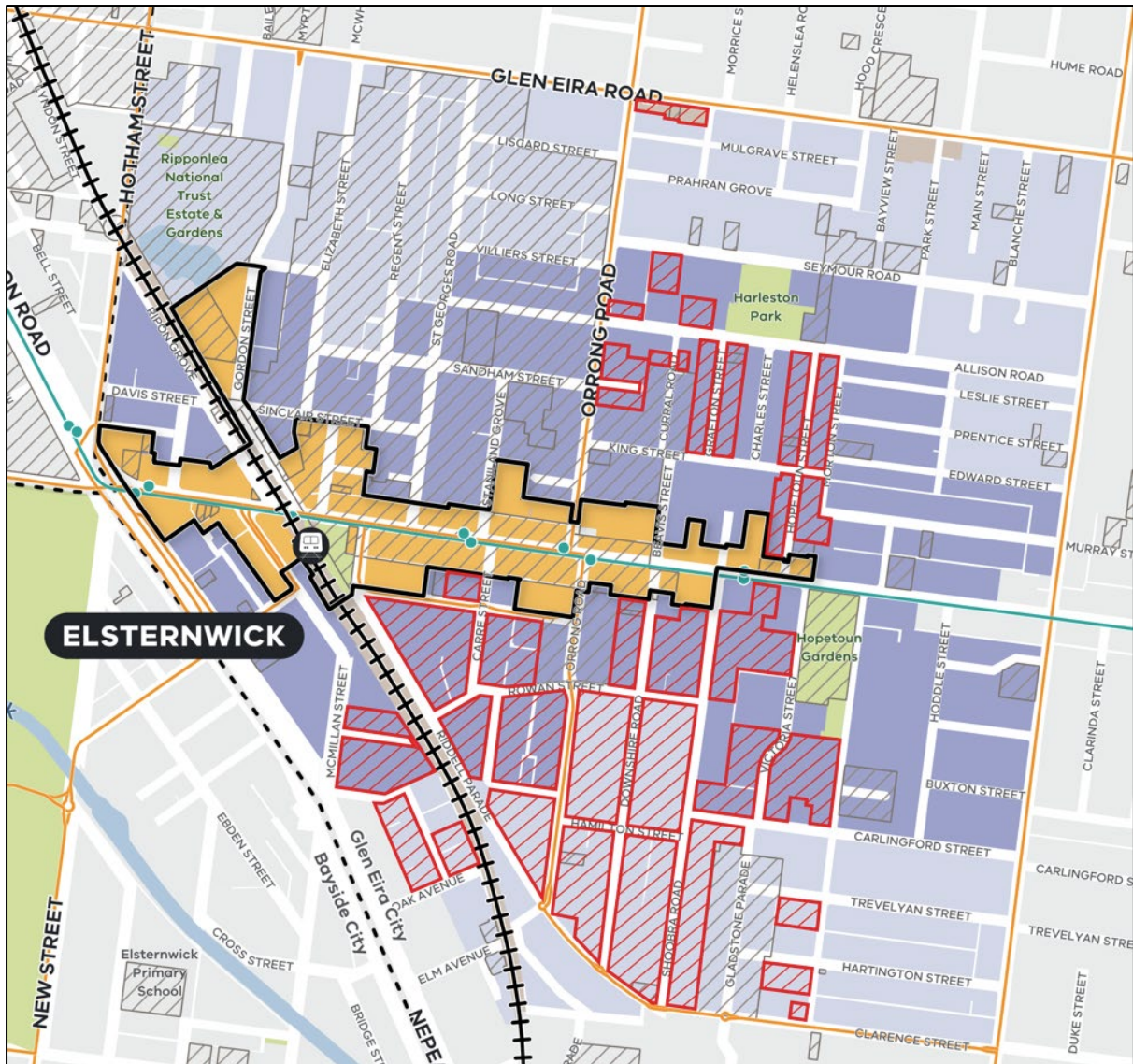
The proposed catchments for Elsterwick are shown on Map 14 below.



Map 14 - Elsterwick Catchments

Nearly half of the proposed catchments in Elsterwick are affected by an existing or proposed heritage overlay. We submit that these existing and proposed heritage properties should not be included in the activity centre catchment and upzoned as a result of this. We also strongly oppose the inclusion of the Australian National Heritage listed Rippon Lea Estate within the outer catchment. Should the Minister disagree with this reasonable position, then at the very

least, we submit that the existing and proposed heritage precincts should not be split between the inner and outer catchment as this would affect the significance of these heritage areas. We strongly oppose the inclusion of any heritage within the inner catchments. The below map shows proposed heritage in red that was not depicted on DTP's map:



Map 15 - DTP map of Elsternwick with proposed heritage added in red

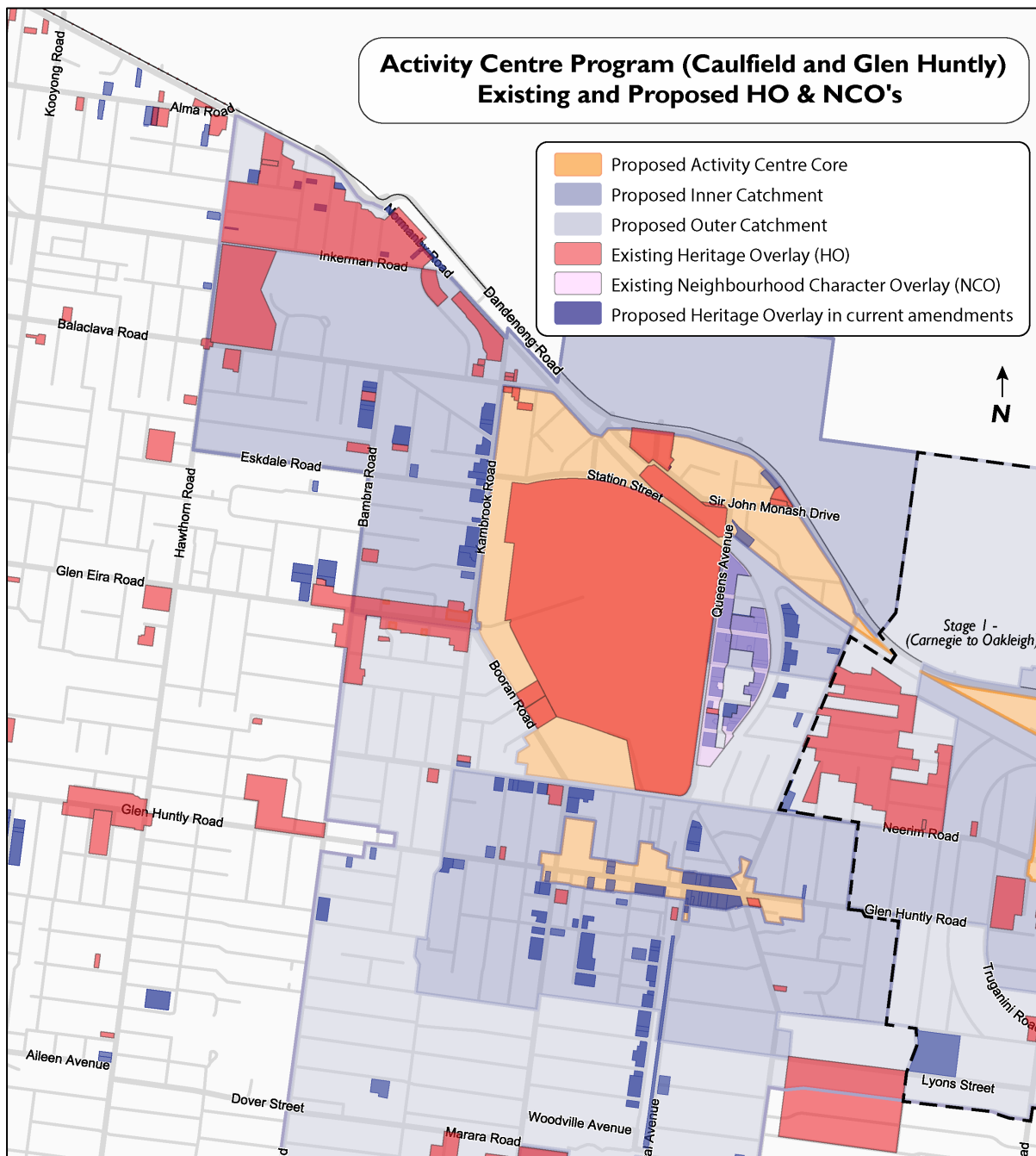
Furthermore, the upzoning of land via the HCTZ is inconsistent with what is proposed under Council's Planning Scheme Amendment C257glen (Elsternwick Heritage). C257glen, consistent with Planning Practice Notes 90 and 91, proposes to downzone heritage areas in Elsternwick to a 2-Storey Neighbourhood Residential Zone while allowing for intensive development west of the railway line. This proposal allowed for the activity centre to grow whilst protecting the valued heritage areas surrounding the core. Council queries whether the explanatory reports and justification for amendment C257glen zoning have been considered by the activity centre program team? It is noted that residential land around the Elsternwick commercial strip was placed in a 4-storey Residential Growth Zone at a time when sweeping zones were implemented by desktop review at state government level and without proper consideration of the heritage context. Council's proposed amendment sought to rectify this zoning oversight.

The inner catchment appears to extend quite far east, past Hopetoun Gardens, particularly when the train station is located towards the western end of the centre. Council questions the inconsistency of this. It is noted that the catchments do not extend west across Hotham Street and Nepean Highway (Port Phillip and Bayside councils). Many of these properties are much closer to the shops and train station than land to the east. Furthermore, DTP's map includes Elsternwick Park as one of the three "places you love spending time in" yet this is also outside of the catchment. If Nepean Highway was considered a significant barrier for walkability, why wasn't the same principle applied to Caulfield with land across Dandenong Road? We question whether municipal boundaries have influenced the selection of boundaries. Council submits that these inconsistencies should be addressed.

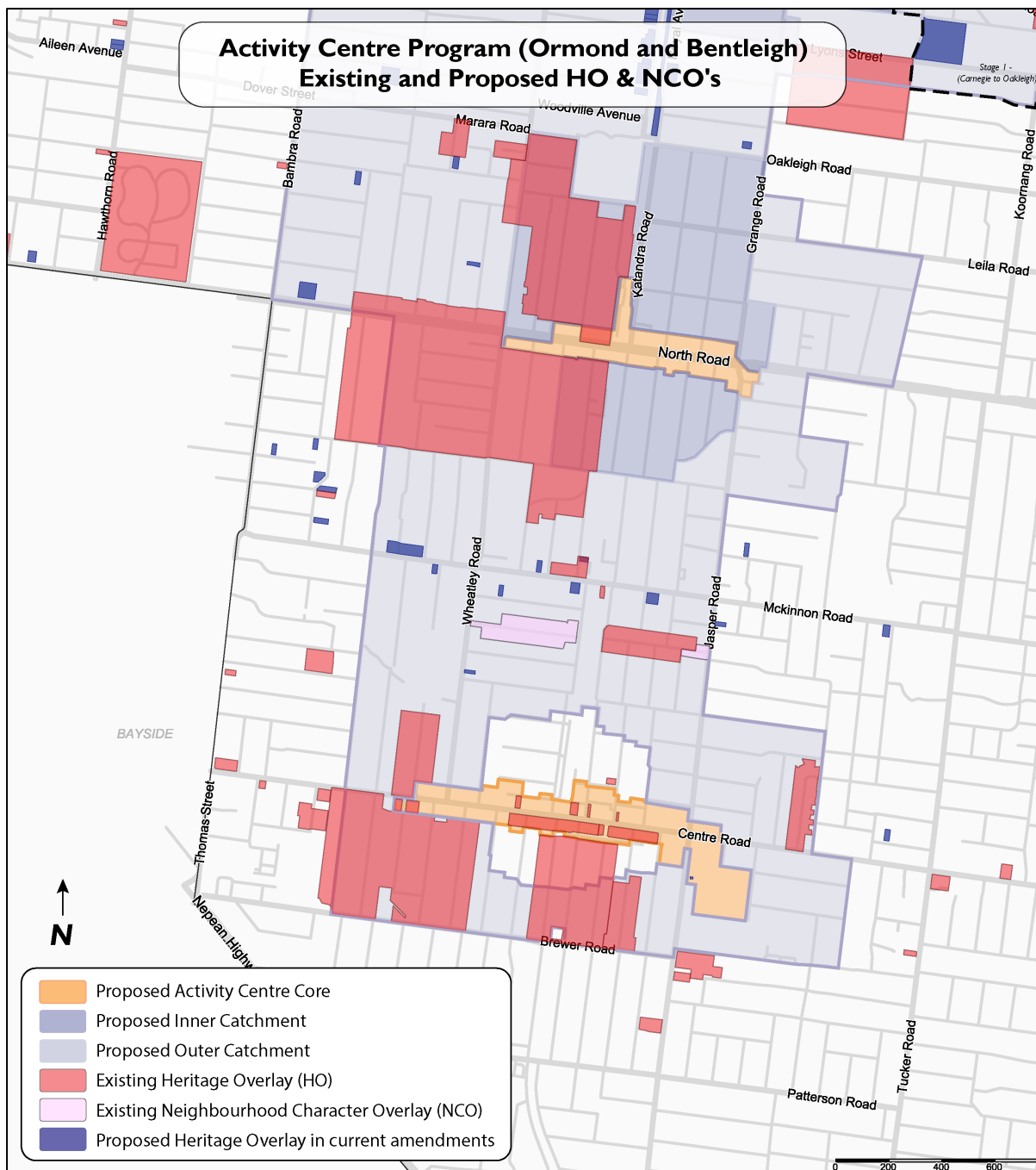
With the potential for 6-storey buildings to be developed north of Hopetoun Gardens and Harleston Park, we raise concerns about overshadowing to these open spaces. Council questions how this will be managed through planning controls, such as the HCTZ or deemed to comply standards. The extent of the inner and outer catchments to the west of the core can be reduced on the basis that areas to the west, beyond Nepean Hwy and Hotham St can be included.

Implications for Heritage

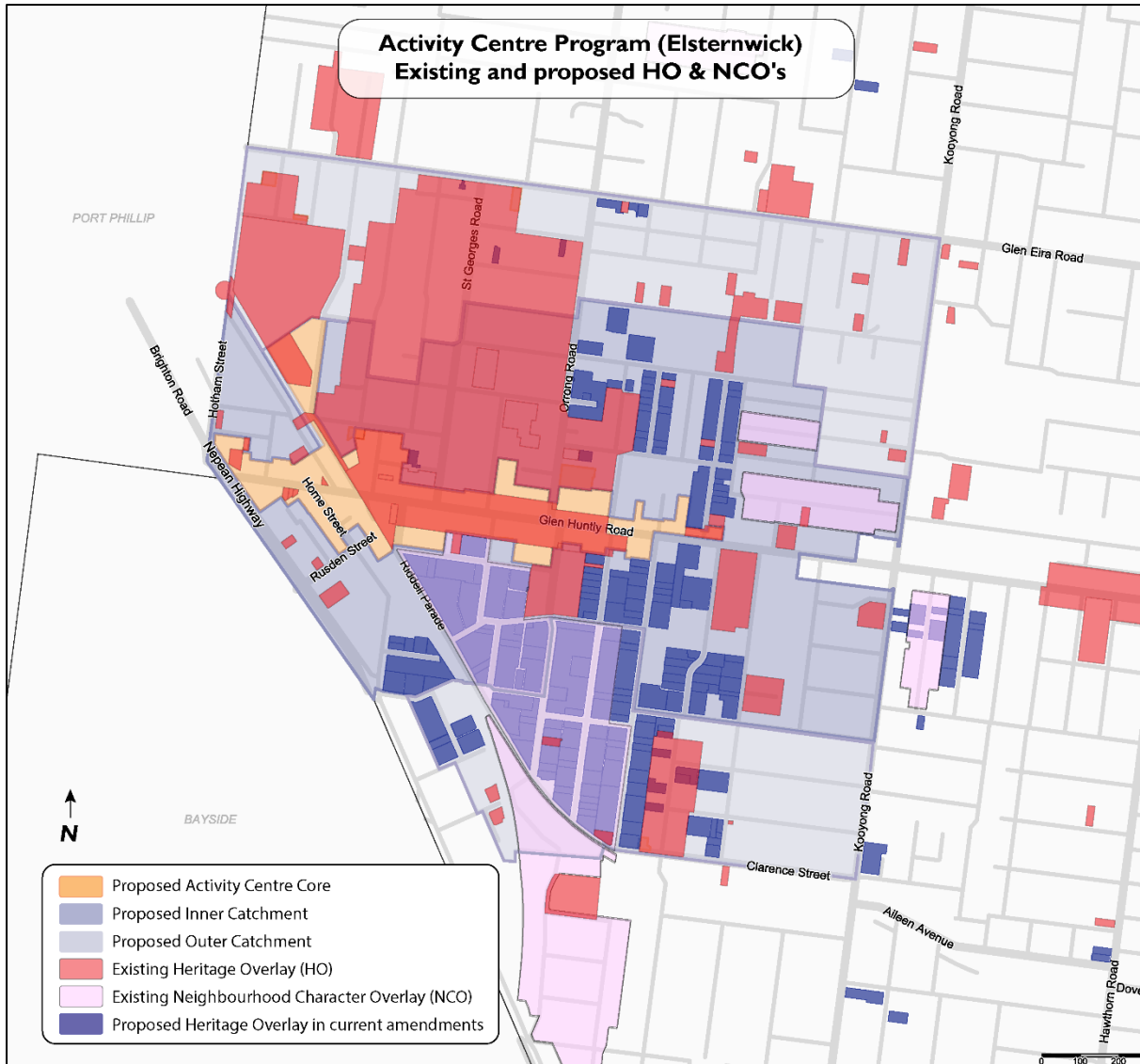
Nearly 20% of sites in the Caulfield to Bentleigh cluster (catchment and core areas) and nearly 50% of sites in the Elsternwick cluster (catchment and core areas) are affected by a current or proposed Heritage Overlay (HO). This is depicted in the below maps. It is noted that these maps also show Neighbourhood Character Overlays (NCOs) which identify areas of existing neighbourhood character. The maps produced by DTP only show existing HOs but fail to acknowledge the proposed HOs that have been sitting with the Minister for Planning for many years. The full extent of existing and proposed heritage areas impacted are illustrated on the following set of maps.



Map 16 - Existing and proposed HO and NCOs for Caulfield and Glen Huntly



Map 17 - Existing and proposed HO and NCOs for Ormond and Bentleigh



Map 18 - Existing and proposed HO and NCOs for Elsternwick

The heritage areas shown in these maps include fine examples of Victorian, Federation, and Interwar architecture. There are also more eclectic varieties such as arts and crafts, interwar and mid-century modern style dwellings.

Council submits that it is contradictory planning to apply a high growth zone to areas of heritage significance. While heritage controls do not prohibit development, the AC Program creates a fundamental planning conflict.

The purpose of the HCTZ is to provide housing at increased densities, whilst the purpose of the Heritage Overlay is generally to conserve heritage places and to ensure development does not adversely affect the significance of these places. Applying the HCTZ to properties with heritage protection is contradictory and creates unclear expectations for residents, developers, and decision-makers. DTP's recent revision to *Planning Practice Note 91 (Using the residential zones)* indicates that "the suitability of a proposed development in the HCTZ in regard to the heritage significance of a place can be assessed at the permit application stage." This approach places the burden on Council or VCAT to reconcile competing policy directions only once an applicant has already committed substantial resources to preparing plans and supporting

material. Council queries why this responsibility is deferred to the permit stage when there is no clear upfront guidance on what outcomes will be acceptable.

Applying the HCTZ to HO properties is also contrary to advice from the Standing Advisory Committee recommendations from the Pilot program, which stated that applying the catchment to HO sites would create “an inherent conflict between planning controls, which is undesirable” and that the catchment “should not be applied to these areas”. Council is concerned that this could lead to the demolition of heritage buildings, as evidenced by VCAT decisions in the past, such as *1045 Burke Rd Pty Ltd v Boroondara CC & Ors*. It could also lead to taller built form in heritage streetscapes. The new deemed to comply provisions make it difficult to consider impacts of development to adjoining heritage properties.

Council’s adopted *Housing Strategy* and existing planning policy designates HO land as being in a Minimal Change Area, where the least amount of development is expected. This is in line with *Planning Practice Note 90 (Planning for Housing)* which states that “minimal change areas tend to have overlays that reflect neighbourhood character, heritage, environmental or landscape significance or other physical constraints which may impact their capacity for change.” Questions from both Council officers and the community regarding how these existing overlays will be balanced with the growth envisaged by the new controls have not been satisfactorily addressed within the AC Program.

We also are also concerned that our proposed heritage amendments have not been considered alongside the proposed catchments and that it will be more difficult to justify the application of these protections based on the new approach to promote high growth in these areas.

Conclusion

Thank you for the opportunity to provide feedback on Stage 2 of the AC Program. Although Council has identified several concerns with the process and aspects of the draft maps, we are committed to continuing to work constructively with DTP to ensure the best possible outcomes for our community.

The key points Council submits are:

1. Improve transparency and consultation processes. DTP should release technical reports and built-form modelling and provide the community with clear information about proposed planning controls.
2. Reinstate the role of Council-led strategic planning. Council urges the Minister for Planning to progress long delayed planning scheme amendments that are still relevant, and to better support councils in the future rather than failing to recognise the substantial body of work and resources already spent on strategic planning.
3. Consider Council's proposed heritage controls in the core and catchments.
4. The Built Form Overlay (BFO) Schedules for Glen Eira's centres should not remove notice and review rights. There is a place for an appropriate level of community involvement in planning decisions in Glen Eira.
5. Address the unintended consequences of removing policy consideration, in particular underdevelopment, from planning assessments before further land is rezoned to the Housing Choice and Transport Zone (HCTZ).
6. Ensure building heights consider overshadowing of shopping strip footpaths, public open spaces, and adjoining residential properties.
7. Supports growth within the core of the activity centres but question whether overshadowing and other amenity impacts have been tested which appear to lack a rationale.
8. Apply consistent and realistic catchment boundaries to each centre which better respond to the concentration of services and public transport which are closer to the stations rather than artificially elongating catchments to the core boundary. To address this discrepancy, reduce the extent of the catchments as detailed in this submission.
9. Address fundamental conflicts between heritage protection and catchment upzoning. Do not defer the resolution of heritage/growth conflicts to the planning permit stage.