



City of Kingston
Strategic Planning
via email: strategic.planning@kingston.vic.gov.au

26 July 2018

Amendment C151 – Peninsula Kingswood Country Golf Course

I write in response to the City of Kingston's proposed Amendment C151 to the planning scheme intended to permit the medium to high density infill residential development of Peninsula Kingswood Country Golf Course.

I am opposed to Amendment C151 and Planning Permit Application KP16/134.

Since its establishment in 1937, the Peninsula Kingswood Country Golf Course has played a significant role in the history of Dingley Village. Beyond its long held recreational use, the Peninsula Kingswood Country Golf Course is also an integral part of Dingley Village's urban character, particularly for its high value open space and amenity qualities. The City of Kingston's *2012 Open Space Strategy Update Part 2: Open Space Analysis and Actions* report characterises a deficit of open space across the Dingley Village area and the need to protect and unlock potential open space areas for community benefit, such as golf courses. What the report does not do is recommend medium to high infill residential development of Peninsula Kingswood Country Golf Course as is proposed.

As well, the report reflects those parts of the City of Kingston's planning scheme provisioned to safeguard numerous municipal golf courses as potential future community open spaces. For example, the City of Kingston has in place an unchanged and established strategic planning position for current and "non-golf" land use attached to the Peninsula Kingswood Country Golf Course. As noted in the City of Kingston's *2015 Golf Course Policy*, "golf courses are protected through specific provisions under Schedule 1 to the Special Use Zone. This is the highest level of protection that can be provided and the purpose of the zone." Principally, the City of Kingston's planning scheme safeguards Peninsula Kingswood Country Golf Course as an open space asset for Dingley Village residents.

I see no justification for altering these safeguards or for changing the City of Kingston's planning scheme to permit infill residential development, consolidation and urban expansion over the site. The proposed amendment contemplates changes that are dramatically different and contrary to the City of Kingston's Planning Scheme. The single intent of the proposed amendment and planning application is to erase the current planning protections designed to prohibit the very kind of residential development proposed.

I also acknowledge the substantial work undertaken by the City of Kingston to integrate considerable affordable housing options and community infrastructure into the proposed development. I have no criticism of the City of Kingston's role in this application, but rather of the application itself.

If Amendment C151 is adopted, it will result in significant and harmful planning implications and the unacceptable permanent loss of high value open space for the Dingley Village and wider community to inappropriate development.

I call for Amendment C151 to be abandoned and encourage the City of Kingston and the Victorian State Government to preserve the current planning protections created to retain Peninsula Kingswood Country Golf Course as open space for Dingley Village residents and the wider community. The City of Kingston needs more, not less open spaces and community parklands.

General analysis

It is widely agreed that the City of Kingston has a shortage of open space. As noted in the 2017 *Public Open Space Contributions Review* by SGS Economics and Planning, the City of Kingston has undertaken a significant amount of planning to understand its open space needs against population growth and urban expansion. One important policy response is the City of Kingston's 2015 *Golf Course Policy*, which delivers a thorough strategic planning position for golf courses based on their interpretation under the planning scheme as of one of Kingston's most "highly valued resources".

For example, the policy describes the collection of golf courses across Kingston as assets of "specialness" because of their contribution to community open space and high environmental and amenity value. The policy also justifiably recognises this uniqueness with a range of planning scheme protections under Schedule 1 to the Special Use Zone. These same protections also rightly establish and embed a strategic statement of benefit where the community should continue to enjoy the open space opportunities that golf courses hold. The policy states:

In the Kingston Planning Scheme golf courses are protected through specific provisions under Schedule 1 to the Special Use Zone. This is the highest level of protection that can be provided and the purpose of the zone is explicit in stating that it seeks to provide for the use and development of land as a golf course and associated uses.

and

...Where clubs are genuinely unable to be economically viable and should the land owner wish to cease golf operations on the site, the Council is keen that the land is used for public or private open space purposes that allow the land to retain its green and open vistas.

Correspondingly, the Municipal Planning Association of Victoria's 2017 *Planning for Golf in Victoria* report and the Victorian State Government's 2017 *Planning for golf in Victoria Discussion Paper* (discussion paper) underlines the same open space shortage and urban expansion relationship. The report emphasises that golf courses should be viewed by policy makers as a strategic planning opportunity to address this shortage. Equally, the discussion paper repeatedly highlights the important contribution golf courses make to community open space networks and their high environmental and amenity value. In view of this, the proposed infill residential development of Peninsula Kingswood Country Golf Course is and should continue to be an unacceptable land use and development proposal under Kingston's planning scheme. The proposed amendment should be abandoned because it will not provide a net benefit to the community.

I am also concerned about any submission that suggests the appropriateness of residential development of the site because it falls in an established residential area, or because it

might cease functioning in the near future according to its original purpose. Likewise, any claim that the existing Special Use Zone becomes obsolete if the Peninsula Kingswood Country Golf Course stops operating should also be rejected. Peninsula Kingswood Country Golf Course is protected in the City of Kingston's planning scheme for its open space significance. It has not been identified as a strategic future infill residential development opportunity. For these reasons, imposing a General Residential Zone (Schedule 2) over the site is unacceptable.

Conclusion

Increasing land development practices that threaten protected high value open space sites, such as Peninsula Kingswood Country Golf Course, should be seen as unacceptable planning and social and community policy outcomes. Any proposed amendment to the City of Kingston's planning scheme should have high regard for achieving the existing policy objectives of preserving municipal golf courses as high value sites of current and potential community open space.

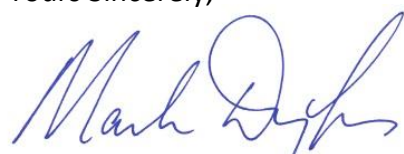
It is entirely inappropriate to amend the City of Kingston's planning scheme with the intent to erase these safeguards and open space objectives that subsequently permit land use and development that is currently prohibited.

If adopted, the proposed amendment will prioritise private profit over open space. The objectives of developers and their land acquisition decisions should not lead to destructive planning scheme changes that hold no net community benefit.

Also, if the amendment is adopted, it will establish a working model that supports developers seeking to abolish planning scheme protections over high value community open space sites. This would also be entirely inconsistent with attempts to address the open space shortages across the municipality.

The proposed amendment and attached residential development application are entirely inconsistent with the City of Kingston's Planning Scheme that protects the Peninsula Kingswood Country Golf Course from such proposals. It should be the priority of local and state governments to safeguard and create new open spaces, not to diminish and destroy them.

Yours Sincerely,

A handwritten signature in blue ink, appearing to read 'Mark Dreyfus', is written over the typed name below.

MARK DREYFUS QC MP
Federal Member for Isaacs