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# Frankston City Council Environmentally Sustainable Development (ESD Policy Investigation

Recommended Policy Triggers

September 2019

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#### Introduction

Frankston City Council has engaged Sustainable Development Consultants to complete background research and prepare options with strategic justification for policy triggers in relation to a draft Environmentally Sustainable Development (ESD) planning policy to be considered by Council.

Background research investigating existing local ESD policies, best practice approaches and financial/resourcing implications has been undertaken to inform stakeholders of key information and assist the implementation of an ESD Planning Policy appropriate for the municipality.

This report will outline the recommended policy triggers to be included in a Frankston ESD policy for both:

- Non-residential developments; and
- Accommodation/Mixed Use developments with a residential component.

The report also outlines recommended application requirements and a summary of financial implications based on the recommended policy triggers.

# 2. Types of developments

The local development context of Frankston City Council should be reflected in any adopted policy and associated thresholds. Setting thresholds to capture the dominant development type, while also considering the statutory burden and associated resourcing implications, will allow Council the best opportunity to influence ESD outcomes in the municipality.

# 2.1 Frankston City Council development statistics

Development application data for a period of 2.5 years (Jan 2017–Jun 2019) was analysed to determine the average number of multi-dwelling residential applications received by Frankston City Council per year. On average, multi-dwelling applications total 106 per year. See below for further detail based on the number of dwellings per development.

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Number of dwellings	Average applications per year	% of multi-dwelling applications
2	40	38%
3	29	27%
4	12	11%
5	3	3%
6	6	6%
7	1	1%
8	3	3%
9	1	1%
10 or more	11	10%

On average, Frankston City Council only receives two applications per year for accommodation other than dwellings such as aged care facilities, motels and student accommodation.

On average, non-residential development applications total 22 per year, approximately half of which are for warehouse developments. Of non-residential and multi-dwelling residential applications combined, non-residential only accounts for less than 20 per cent of applications.

Currently over 80 per cent of the Frankston population lives in a single dwelling with the remaining population living in multi-unit developments (i.e. apartments, semi-detached houses and/or townhouses). It has been found that "Frankston City's population living in multi-unit dwelling developments is predicted to sharply increase to 45% of all dwellings by 2031". While multi-dwelling developments currently account for a large proportion of applications received by Council, it can be expected that this development type will become even more significant in the future.

It should be noted that on average 110 applications per year are also received for single dwellings, either as the sole dwelling on a lot or in addition to an existing dwelling on a lot.

# 3. Policy Context

Addressing the impact of urban development on the natural environment can be undertaken through the town planning process when key decisions are made about building design. Applying the concept of Environmentally Sustainable Development (ESD) during the planning process allows consideration of environmental sustainability in order to achieve a range of environmental, social and economic benefits.

ESD aims to ensure that development meets the needs of the present without comprising the ability of future generations to meet their own needs by adhering to appropriate environmental design standards. A concept related to ESD is Water Sensitive Urban Design (WSUD), an approach to planning and designing urban areas which aims to reduce the impact of development on the water cycle. While WSUD is a defined concept of its own, consideration of WSUD commonly also occurs when ESD principles are applied more broadly.

A range of approaches to ESD and WSUD through the planning process have been undertaken at both a state and local government level. The following information aims to outline these current approaches.

# 3.1 Policy thresholds

As outlined in the Frankston City Council ESD Policy Background Information Findings, a range of different thresholds for the application of a local ESD policy have been adopted.

#### 3.1.1 EXISTING RESIDENTIAL POLICY THRESHOLDS

Below is a summary of the different residential thresholds present within the existing 17 Victorian ESD policies, and how commonly each threshold is applied.

Additionally, groupings based on local government area (LGA) similarities are included. Frankston City Council is grouped with the following Councils as Outer Urban (OU), based on like/comparable planning scheme areas. Such grouping is used for purposes such as averaging planning permit activity data. OU councils include:

- Brimbank;
- Frankston:
- Greater Dandenong;
- Knox:
- Maroondah:
- Mornington Peninsula;
- Nillumbik; and
- Yarra Ranges.

Of the 17 Councils with local ESD planning policies, the majority (11) are classed as Inner and Middle Urban<sup>2</sup>. Three are Outer Urban, two are Growth Area Councils<sup>3</sup> and one is a Regional City<sup>4</sup>.

<sup>&</sup>lt;sup>1</sup> Frankston City Council Waste Minimisation and Management Plan (2015-2020), p. 32.

<sup>&</sup>lt;sup>2</sup> Grouping includes Banyule, Bayside, Boroondara, Darebin, Glen Eira, Hobsons Bay, Kingston, Manningham, Maribyrnong, Melbourne, Monash, Moonee Valley, Moreland, Port of Melbourne, Port Phillip, Stonnington, Whitehorse and Yarra.

<sup>&</sup>lt;sup>3</sup> Grouping includes Cardinia, Casey, Hume, Melton, Whittlesea and Wyndham.

<sup>&</sup>lt;sup>4</sup> Grouping includes Ballarat, Greater Bendigo, Greater Geelong, Greater Shepparton, Horsham, Latrobe, Mildura, Wangaratta, Warrnambool and Wodonga.

#### Residential - Small

Key insights:

- The majority of LGAs (10) have a threshold of 2-9 for dwellings.
- No LGAs currently have a threshold including single dwellings.
- Of the 10 LGAs with a 2-9 dwellings threshold, two are Outer Urban and two are Growth Area Councils.
- Of LGAs with a 2-9 dwellings threshold, half have a minimum threshold of 50m<sup>2</sup> for accommodation other than dwellings.
- Of LGAs with a 2-9 dwellings threshold, the majority (8) have a maximum threshold of 1,000m<sup>2</sup> for accommodation other than dwellings.

Table 2: Threshold variation for small residential developments

LGA	Planning Scheme Grouping	Res - Small (Dwellings) <sup>5</sup>	Res - Small (GFA m²)6
Banyule	Inner and Middle Urban	2-9	50-1000
Moreland	Inner and Middle Urban	2-9	50-1000
Port Phillip	Inner and Middle Urban	2-9	50-1000
Stonnington	Inner and Middle Urban	2-9	100-1000
Yarra	Inner and Middle Urban	2-9	100-1000
Knox	Outer Urban	2-9	500-1000
Brimbank	Outer Urban	2-9	50-2000
Hobsons Bay	Inner and Middle Urban	2-9	50-1000
Whittlesea	Growth Area	2-9	100-1000
Wyndham	Growth Area	2-9	500-1999
Whitehorse	Inner and Middle Urban	3-9	500-1000
Monash	Inner and Middle Urban	3-9	500-1000
Manningham	Inner and Middle Urban	3-9	500-1000
Darebin	Inner and Middle Urban	3-9	100-999
Greater Bendigo	Regional Cities	3-9	1000-2499
Greater Dandenong	Outer Urban	3-9	1000-2499
Kingston	Inner and Middle Urban	3-9	1000-2499

# Residential - Large

Key insights:

- All LGAs have a threshold of >10 dwellings.
- The majority (12) of LGAs have a >1,000m<sup>2</sup> threshold for accommodation other than dwellings.
- Two Outer Urban LGAs have a threshold different to >1,000m² for accommodation other than dwellings (>2,000m² and >2,499m²).

Table 3: Threshold variation for large residential developments

LGA	Planning Scheme Grouping	Res - Large (Dwellings)	Res - Large (GFA m <sup>2</sup> )
Banyule	Inner and Middle Urban	>10	>1000
Moreland	Inner and Middle Urban	>10	>1000
Port Phillip	Inner and Middle Urban	>10	>1000
Stonnington	Inner and Middle Urban	>10	>1000

<sup>&</sup>lt;sup>5</sup> Accommodation/Mixed Use with residential component of dwellings.

<sup>&</sup>lt;sup>6</sup> Development of a building for accommodation other than dwellings.

LGA	Planning Scheme Grouping	Res - Large (Dwellings)	Res - Large (GFA m²)
Yarra	Inner and Middle Urban	>10	>1000
Knox	Outer Urban	>10	>1000
Hobsons Bay	Inner and Middle Urban	>10	>1000
Whittlesea	Growth Area	>10	>1000
Whitehorse	Inner and Middle Urban	>10	>1000
Monash	Inner and Middle Urban	>10	>1000
Manningham	Inner and Middle Urban	>10	>1000
Darebin	Inner and Middle Urban	>10	>1000
Brimbank	Outer Urban	>10	>2000
Wyndham	Growth Area	>10	>2000
Greater Bendigo	Regional Cities	>10	>2499
Greater Dandenong	Outer Urban	>10	>2499
Kingston	Inner and Middle Urban	>10	>2499

# Non-residential - Small & Large

Key insights:

- The most common minimum thresholds for Small are 100m<sup>2</sup> (6 LGAs) and 500m<sup>2</sup> (6 LGAs).
- The three Outer Urban LGAs have quite different minimum thresholds for Small (50m², 500m² and 1,000m²).
- The majority (12) of LGAs have a threshold of >1000m² for Large,
- The three Outer Urban LGAs have thresholds of either >2,000m<sup>2</sup> or >2,499m<sup>2</sup> for Large.

Table 4: Threshold variation for non-residential developments

LGA	Planning Scheme Grouping	Non-res - Small (GFA m²)	Non-res - Large (GFA m²)
Port Phillip	Inner and Middle Urban	50-1000	>1000
Brimbank	Outer Urban	50-2000	>2000
Darebin	Inner and Middle Urban	100-999	>1000
Banyule	Inner and Middle Urban	100-1000	>1000
Moreland	Inner and Middle Urban	100-1000	>1000
Stonnington	Inner and Middle Urban	100-1000	>1000
Yarra	Inner and Middle Urban	100-1000	>1000
Hobsons Bay	Inner and Middle Urban	100-1000	>1000
Whittlesea	Growth Area	300-1000	>1000
Whitehorse	Inner and Middle Urban	500-1000	>1000
Monash	Inner and Middle Urban	500-1000	>1000
Manningham	Inner and Middle Urban	500-1000	>1000
Greater Bendigo	Regional Cities	500-1000	>1000
Wyndham	Growth Area	500-1999	>2000
Knox	Outer Urban	500-2000	>2000
Greater Dandenong	Outer Urban	1000-2499	>2499
Kingston	Inner and Middle Urban	1000-2499	>2499

#### 3.1.2 RECOMMENDED POLICY THRESHOLDS

Based on the policy thresholds utilised by other Victorian Councils, the development context of Frankston City Council and the associated resourcing implications, the following thresholds are recommended for a Frankston ESD planning policy. A rationale and justification is provided for different development types.

#### Residential - Small

Recommended thresholds:

- 2-9 (Dwellings).
- 50-1000m<sup>2</sup> (Accommodation other than dwellings).

#### Rationale:

- Demonstrate ambition;
- Capture the predominant multi-dwelling development type;
- The same as the majority of LGAs; and
- Manageable amount of statutory workload.

There is no distinct approach to setting a minimum threshold for Small (Dwellings), as is evident below in Table 5 in a comparison of thresholds and multi-dwelling planning permit activity. Such a decision will be guided by balancing ambition and resourcing implications, while also acknowledging the local development patterns.

For example, Councils such as Port Phillip and Greater Bendigo only have a small number of multi-dwelling planning permits compared to other LGAs and compared to other permit types within their municipality. However, Port Phillip has adopted a threshold of 2-9 dwellings while Greater Bendigo elected for 3-9. Conversely, Moreland and Whitehorse have the largest number of multi-dwelling permit activity of all LGAs yet have different thresholds. Inner city LGAs such as Port Phillip and Moreland are likely guided by greater organisational ambition regarding ESD and possibly supported by the funding required to achieve such objectives. A middle urban or regional LGA such as Whitehorse or Greater Bendigo may be limited in their ability to push for and resource the inclusion of a greater number of development types. Therefore, setting a threshold is more dependent on the level of desire to influence ESD in development and the ability to apply an ESD policy.

Compared to other councils with ESD policies, the amount of multi-dwelling permit activity in Frankston is by no means substantial. By electing a 2-9 dwelling threshold, Frankston City Council will demonstrate ambition by opting for the inclusion of two dwellings and influence ESD outcomes in the multi-dwelling development type which represents the majority type in Frankston (38% of all multi-dwelling applications), while also being able to handle the greater statutory workload (Refer 5.2.3 for further detail).

Table 5: Comparison between dwelling thresholds and multi-dwelling planning permit activity

LGA	Planning Scheme Grouping	Res - Small (Dwellings)	Multi-dwelling planning permit activity 2017/187
Banyule	Inner and Middle Urban	2-9	173
Moreland	Inner and Middle Urban	2-9	424
Port Phillip	Inner and Middle Urban	2-9	77
Stonnington	Inner and Middle Urban	2-9	204
Yarra	Inner and Middle Urban	2-9	52
Knox	Outer Urban	2-9	297
Brimbank	Outer Urban	2-9	266
Hobsons Bay	Inner and Middle Urban	2-9	321
Whittlesea	Growth Area	2-9	135
Wyndham	Growth Area	2-9	80
Whitehorse	Inner and Middle Urban	3-9	423

<sup>&</sup>lt;sup>7</sup>https://www.planning.vic.gov.au/resource-library/planning-permit-activity-in-victoria/planning-permit-activity-annual-report-2017-18

LGA	Planning Scheme Grouping	Res - Small (Dwellings)	Multi-dwelling planning permit activity 2017/18 <sup>7</sup>
Monash	Inner and Middle Urban	3-9	354
Manningham	Inner and Middle Urban	3-9	394
Darebin	Inner and Middle Urban	3-9	290
Greater Bendigo	Regional Cities	3-9	43
Greater Dandenong	Outer Urban	3-9	247
Kingston	Inner and Middle Urban	3-9	411
Frankston	Outer Urban	2-9 (proposed)	158

It should be noted that although Frankston receives a number of applications for single dwelling developments, the majority of development in Frankston City Council is multi-dwelling residential and non-residential. Therefore, as the inclusion of single dwellings in a threshold would increase the statutory burden for Council, it is not recommended at this point in time to pursue a single dwelling threshold.

#### Residential - Large

Recommended thresholds:

- >10 (Dwellings).
- >1,000m<sup>2</sup> (Accommodation other than dwellings).

#### Rationale:

- All LGAs have a threshold of >10 dwellings; and
- The majority (12) of LGAs have a >1000m² threshold for accommodation other than dwellings.

Setting thresholds for larger residential developments is more straightforward as there is a common approach by the majority of LGAs. Additionally, setting a lower threshold (e.g. >1,000m² versus >2,000m²) does not result in a greater number of developments being captured by the policy and increase the amount of applications to be assessed, it simply changes the application requirements. Such a difference will only have a minor impact on resourcing requirements, with submitted documents simply required to provide greater detail about the ESD initiatives in their development in a Sustainable Management Plan (SMP) as opposed to in a Sustainable Design Assessment (SDA) (Refer 4.1 for further detail).

#### Non-residential - Small

Recommended threshold:

• 100-1000m<sup>2</sup>.

#### Rationale:

- 100m<sup>2</sup> is one of the most common minimum thresholds;
- Manageable amount of statutory burden; and
- Demonstrates ambition.

A minimum threshold of 100m² is a common approach for a number of councils. Given the number of non-residential applications in Frankston is much smaller than residential applications, opting for a smaller minimum threshold (e.g. 100m² versus 500m²) is unlikely to increase the statutory burden significantly. Additionally, given that 50% of non-residential development is warehousing, a development type commonly larger than 500m², a threshold of 100m² compared to 500m² will only likely result in a small number of additional developments captured by the policy, such as retail spaces. As this provides a minimal impact on resourcing, it allows Frankston to be ambitious in attempting to influence a broad range of development types and sizes.

#### Non-residential - Large

Recommended threshold:

• >1,000m<sup>2</sup>.

#### Rationale:

• >1,000m<sup>2</sup> is the threshold used by the majority of LGAs.

Like the implications for Residential (Accommodation other than dwellings), having a lower threshold (e.g. >1,000m² versus >2,000m²) will not result in a greater number of developments being captured by the policy. Instead, it will simply result in slight differences in application requirements, such as the inclusion of a Green Travel Plan.

Although the three Outer Urban LGAs have thresholds of either >2,000m² or >2,499m² for Large non-residential development, this is the result of specifying large maximum thresholds for Small non-residential developments, and is likely to be an effort to somewhat reduce the statutory burden by simplifying application requirements for a greater proportion of developments. Such a rationale is less applicable to Frankston where overall permit activity for the municipality is significantly lower than these councils.

#### **Summary**

The recommended policy thresholds aim to find a balance between acknowledging Frankston City Council's local development pattern, noting the approaches of other councils, achieving maximum benefit from ESD outcomes, and ensuring acceptable resourcing implications.

Table 6: Summary of recommended policy thresholds for Frankston ESD planning policy

Res - Small	Res - Small	Res - Large	Res - Large	Non-res - Small	Non-res - Large
(Dwellings) <sup>8</sup>	(GFA m²) <sup>9</sup>	(Dwellings)	(GFA m²)	(GFA m²)	(GFA m²)
2-9	50-1,000	>10	>1,000	100-1,000	>1,000

<sup>&</sup>lt;sup>8</sup> Accommodation/Mixed Use with residential component of dwellings.

<sup>&</sup>lt;sup>9</sup> Development of a building for accommodation other than dwellings.

# 4. Assessment and compliance

# 4.1 Application requirements

The most common approach to application requirements for a local ESD policy are outlined below and are appropriate for adoption by Frankston City Council.

Note that integrated water management and stormwater management planning reforms as a result of Amendment VC154 can also be addressed through ESD requirements of a local ESD planning policy.

#### 4.1.1 SMALL DEVELOPMENTS

Small developments, for example <10 dwellings or <1,000m<sup>2</sup>, commonly require a Sustainable Design Assessment (SDA). An SDA is a document that sets out the sustainable design features of a proposed development. Such a report is commonly supported by applying the BESS and STORM tools.

To assist applicants with their submission, Councils may provide an SDA template to help guide a response.

Objectives within an ESD policy relating to sustainability issues such as energy, water, indoor environment quality and waste are addressed within BESS, a tool specifically designed to address requirements of local ESD planning policies.

#### 4.1.2 LARGE DEVELOPMENTS

Large developments, for example >10 dwellings or >1,000m², commonly require a Sustainability Management Plan (SMP). An SMP is similar to an SDA in that it addresses similar sustainability issues, however it requires a more detailed response regarding how the performance outcomes will be achieved. The nature of larger developments provides the opportunity for increased environmental benefits and major resource savings. Hence, greater rigour in assessment is justified.

Such a report is commonly supported by the use of the BESS/Green Star, MUSIC/STORM tools. Councils may also provide an SMP template to help guide an applicant response.

Additionally, a Green Travel Plan (GTP) is often required for larger developments. This outlines the efforts a development proposes to reduce reliance on single occupant motor vehicle trips. It must be noted that depending on the location of a development and its proximity to alternative transport infrastructure, a GTP may not entirely be appropriate for all large developments due to limitations inherent in a location. Addressing policy objectives relating to transport may be more appropriately addressed within an SMP for some developments. Application requirements regarding transport for each application may be at the discretion of Council when acting as the Responsible Authority.

#### 5. Financial implications

The following outlines the costs associated with implementing a local ESD planning policy. The tools listed are those recommended as appropriate for Frankston City Council.

# 5.1 Memberships

Membership to the Council Alliance for a Sustainable Built Environment (CASBE) allows Member Councils access to networking, education, training and resources, in addition to participation in the strategic direction of CASBE. A council must be a CASBE member to subscribe to the BESS tool. The cost of membership <sup>10</sup> is:

• \$6,000 ex. GST (per annum).

### 5.2 Tools

A separate fee is applicable for a BESS subscription. BESS subscription enables planning permit applicants within the municipality access to the tool. A subscription to BESS<sup>11</sup> is:

• \$7,500 ex. GST (per annum).

For Council to be best placed to assess all applications types, licensing for the Model for Urban Stormwater Improvement Conceptualisation (MUSIC) software is recommended. Access to this software will allow Council to critically evaluate the outputs of any submitted modelling results by reviewing the inputs and assumptions of the model. Costs for MUSIC<sup>12</sup> licensing are:

- \$5,500 ex. GST (MUSIC Single User USB Dongle and first 12 months Support & Maintenance).
- \$600 ex. GST (Annual Maintenance and Support including updates).

# 5.3 Staff Resourcing

ESD training modules are available for planning staff of CASBE Member Councils, in addition to reduced rate inhouse BESS training for council staff. While training of planning staff in ESD principles and assessing planning applications against ESD planning provisions should occur to build internal capacity, it is recommended that a dedicated ESD planning officer position be created at Frankston City Council.

A dedicated staffing resource responsible for assessing ESD in planning applications has a range of benefits. These include the provision of expert ESD advice to planning applicants throughout the process, as well as support to planners for ESD matters. A dedicated ESD officer will also increase the efficiency in processing applications and will result in a consistent response from Council to applicants regarding ESD planning requirements. This will increase the ability to achieve meaningful ESD outcomes and ensure applicants are provided with a clear approach to ESD in their developments.

Sufficient internal resourcing is required relevant to the expected workload, based on any proposed policy. It must be noted that the Frankston City Council Towards Zero Emissions Plan (2019-2023) contains an action to "Resource a dedicated officer to conduct on-site ESD inspections for developments once built, to ensure compliance with the ESD policy planning amendment" for a salary of \$82,000-93,000 per annum. Compliance is an integral aspect in achieving ESD outcomes and is best used to complement different stages in the development process such as design and assessment, and verification of as-built outcomes.

It is therefore recommended that the above officer position be utilised to undertake a range of responsibilities relating to ESD in the planning process, including but not limited to:

Internal education for the organisation relating to ESD in the planning process;

<sup>10</sup> https://www.casbe.org.au/who-we-are/membership/

<sup>11</sup> https://www.casbe.org.au/who-we-are/membership/

<sup>12</sup> https://ewater.org.au/products/music/access-licensing/

<sup>&</sup>lt;sup>13</sup> Frankston Towards Zero Emissions Plan (2019-2023), p.14.

- Attendance at pre-application meetings to assist planning applicants to understand the application requirements relating to ESD;
- Provision of ESD advice to planning applicants on how to improve their development;
- Point of contact for external enquiries regarding ESD;
- Assessment of planning applications for ESD requirements;
- Assistance to planning applicants during the application process such as explanation of Requests for Further Information from Council;
- On-site ESD inspections for developments once built to ensure compliance with ESD policy;
- External ESD education sessions for developers and built environment consultants to increase local industry understanding; and
- ESD input into Capital Works projects, where appropriate.

The following are estimates of the time required to assess ESD requirements of planning applications. Note that the time it takes to complete an ESD referral varies depending on the development, and how well the documents have been prepared:

- Sustainable Design Assessment: 4 hours; and
- Sustainability Management Plan: 12 hours.

Using the average development statistics for Frankston City Council and estimated assessment times, Tables 7 and 8 (below) summarises the estimated resourcing requirements for assessing planning applications for ESD requirements.

Table 7: Summary of hours required for ESD assessments

Development type	Threshold	Applications (per annum)	Hours
Res - Small (Dwellings)	2-9	95	380
Res - Small (m <sup>2</sup> ) <sup>14</sup>	50-1000	1	4
Res - Large (Dwellings)	>10	11	132
Res - Large (m²)	>1000	1	12
Non-res - Small (m <sup>2</sup> ) <sup>15</sup>	100-1000	5	20
Non-res - Large (m <sup>2</sup> )	>1000	17	204
		TOTAL	752

Table 8: Summary of full-time equivalent hours

Full time equivalent (FTE)	Hours (per week)	Hours (per year)
0.2	7.6	365
0.4	15.2	730
0.6	22.8	1094
0.8	30.4	1459
1	38	1824

Note that while the above estimated time required for ESD assessments is only 752 hours, it is strongly recommended that the role be 1.0 FTE, in order for the officer and Frankston City Council to be best placed to implement a local ESD planning policy. It is emphasised that the ESD Officer role would extend beyond the assessment of applications to include the range of educative, industry liaison, and compliance checking activities

<sup>&</sup>lt;sup>14</sup> Gross Floor Area (GFA) data was not available for Residential (Accommodation other than dwellings) applications. Based on development descriptions for application data assessed, assumption has been made to class 50% of applications as Small and 50% as Large.

<sup>&</sup>lt;sup>15</sup> Gross Floor Area (GFA) data was not available for non-residential applications. Based on development descriptions for application data assessed, approximately 25% of applications have been classed as Small (eg small commercial), and 75% as Large (eg warehousing and larger commercial).

outlined above. Additionally, with the amount of multi-dwelling developments expected to grow in the future, it is possible that the amount of required assessment time will increase over time.

As mentioned, the above resourcing times are estimates and can vary due to a range of factors such as the complexity of the development and how well the submitted documents are prepared. Incorporation of both assessment, compliance and other ESD duties, as outlined previously, into one full time equivalent position will allow suitable flexibility to cater to times of high and low assessment duties. For example, if there is a period when the time required for ESD assessments is lower than estimated, time allocated to other duties such as compliance and education can be increased. Including a breadth of role responsibilities in one role requires the prioritisation of tasks however will ensure that the officer will always be fully occupied.

#### 6. Conclusion

A commitment to environmental sustainability by Frankston City Council is evident in strategic documents and local planning provisions. The introduction of a local ESD planning policy with the recommended policy thresholds would strengthen this commitment and further Council's ability to achieve ESD outcomes in the built environment.

Implementation of the ESD policy will be best achieved through a combination of education, assessment and compliance. It is therefore recommended that a full-time equivalent position be created with a breadth of responsibilities relating to ESD.

Below is a summary of recommendations for Frankston City Council:

#### **Policy Thresholds**

#### Residential - Small:

- 2-9 (Dwellings).
- 50-1000m² (Accommodation other than dwellings).

#### Residential - Large:

- >10 (Dwellings).
- >1,000m<sup>2</sup> (Accommodation other than dwellings).

# Non-residential - Small:

100-1000m<sup>2</sup>.

#### Non-residential - Large:

>1,000m<sup>2</sup>.

## Staff Resourcing

 Creation of a 1.0 FTE role to undertake ESD assessment and compliance duties relating to the implementation of a local ESD planning policy.

#### **Memberships and Tools**

- Council Alliance for a Sustainable Built Environment (CASBE) membership.
- Built Environment Sustainability Scorecard (BESS) subscription.
- Model for Urban Stormwater Improvement Conceptualisation (MUSIC) software licensing.

A local ESD planning policy, associated staffing resource and the recommended memberships and tools will be highly beneficial in contributing towards a sustainable, healthy and resilient built environment in Frankston.