Community feedback – Response to Written Submissions

Cremorne Draft Urban Design Framework

NOTE - The majority of issues identified in the individual submissions are addressed in the Response to Key Issues table at Attachment 7. However, where an issue is very specific or has not been responded to in a key issue, a response is provided below.

Sub No & Interest	Summary	Response
1 Resident Cremorne	 Street network and hotspots Generally supportive of the overall framework. Supports the signalisation of Punt and Kelso Street intersection. Strong concern with the proposed changes to Cremorne Street (Figure 20, Street Implementation Plan, draft UDF): Limits access from southern areas to Swan Street and Church Street Proposes retaining two-way access and no closures on Cremorne Street Rat runners will find another route Strong concerns with alternative changes to Cremorne Street (Figure 21, Alternative Streets Implementation Plan, draft UDF) Completely restricts access to Swan and Church Street Only option to exit Cremorne via Gough or Kelso Streets onto Punt Road Cannot turn right onto Punt Road to travel north. Advocate to Department of Transport to increase the signalised time available for cars travelling westbound along Swan Street to cross Punt Road. This will prioritise local residents' amenity rather than Punt Road traffic. Supports the reduction of on-street parking on Cremorne and Balmain Streets for pedestrian and cyclist improvements. Off-street parking Supports the reduction in commercial (off street) car parking. Proposes precinct basement car parking near Cremorne Street, similar to Cato Square parking in Prahran. Seeks clarification in wording/diagram (Figure 20) – Text stating 'One-way westbound traffic on Kelso Street, east of Cremorne Street' and map is contradictory. 	 Steet network and hotspots See Theme 3 - Traffic and street network and Hotspots. Off-street parking See Theme 3 - Off-street parking.
2 Resident	 Street network and hotspots Strong concern that the street network changes unfairly impacts on vehicular movement for residents. 	 Street network and hotspots See Theme 3 - Traffic and street network and Hotspots.

Sub No & Interest	Summary	Response
No address provided	 Particularly concerned about access to Richmond Primary School (Cremorne Street and Cotter Street in particular). Access to freeway entrance will be impacted by Cremorne Street changes. Concern changes do not account for residents and businesses, particularly as walking and cycling are not always an option. 	
3 Resident Cremorne	 Existing open space No further changes to Church Street Reserve - just requires ongoing maintenance to keep neat and tidy. 	 See Theme 4 - Open space development.
4 Unknown No address provided	 Need for a bold/overarching plan – rather than a piecemeal plan which patches up issues. Recreate Cremorne with a focus on community and sustainable living. Needs bold designs such as community gardens. Public transport Supports the reinstatement of the Cremorne Railway Station. Community facilities Supports the development of a neighbourhood centre with shops, cafes and social services centered on it. Suggests the sale of the Bryant and May site to fund the project. 	 Public transport See Theme 3 – Public transport. Community facilities See Theme 4 - Community facilities and spaces. The Bryant and May site is a privately owned site.
5 Resident Outside Cremorne (Richmond)	 Off-street parking Disagrees with the introduction of maximum car parking rate for developments: A maximum rate provides an option to not provide any car parking which is unacceptable. Significantly reduces development costs and therefore saves the applicant. Dispensation could be used as a lever for better building design outcomes Suggest the introduction of a financial levy for dispensation. Street network and hotspots Comments on the road network proposal and hot spot designs: Overly restrictive and disruptive to residents, particularly those in Kelso Street. Kelso and Punt Road signalisation is not feasible due to recent works by the Department of Transport Supports the Swan Street scramble crossing however, must make allowance for turning circles of trucks and vehicles. Church/Balmain tram stops platforms should be setback from the intersection. Suggests the prevention of rat running through other mechanisms (i.e. local number plates and camera systems to fine other drivers). Built form - General Developers are seeking the highest return on development. 	 Off-street parking See Theme 3 – Off-street parking. Street network and hotspots See Theme 3 - Traffic and street network and Hotspots. Building heights See Theme 5 – Building heights. Street setbacks See Theme 5 - Street and ground floor setbacks. Building separation and boundary walls See Theme 5 – Building separation. Impacts on residential properties See Theme 5 - Amenity impacts – Residential precincts and – Residential properties within the Commercial 2 Zone.

Sub No & Interest	Summary	Response
	 New development not sympathetic to the urban context. Provides photos and commentary on several recent developments. Building heights Not supportive of overall heights - should be lowered and mandatory. Suggests maximum height of 24m decreasing to 12m on narrow streets. Does not support 40m building heights along Church Street. Building heights will impact solar access and wind along Church Street. Street setbacks Suggest street setbacks at the ground floor along north-south streets. Building separation and boundary walls Blank side and rear boundary walls are not adequately addressed. Impacts on residential properties Residential transition not sufficient to address bulk and overlooking. 	
Resident Outside Cremorne (Richmond)	 Consultation Information provided in consultation is overwhelming especially during a period of "Christmas craziness". Summarised information should have been targeted at residents. Street network and hotspots Concerned with street network change impacts on residents including: On street car parking Increased traffic on smaller local streets. Ability to get in and out of residential pockets. 	 Further consultation is proposed on the revised UDF and planning controls. Officers will prepare a summary document as part of the consultation. Street network and hotspots See Theme 3 - Traffic and street network and Hotspots.
7 Streets Alive, Community group	 Support the vision, objectives, and most of the actions of the Draft UDF. Street network and hotspots Concerns that the proposed street network does not deliver on objectives. Provides an alternative approach including: Introducing modal filters at underpasses and the CityLink entrance Creation of two new public plazas or shared zones Rebuilding and widening all footpaths (min 2m, 3m on main streets) Contends that the draft UDF Implementation Plan (an alternative plan) fails to: Significantly reduce traffic volumes Provide equity of safe access for pedestrians and cyclists States that the plan does not have a realistic chance of support from the State Government. Recommends that the UDF does the following: State the desired outcomes for access and movement in the framework 	 Street network and hotspots See Theme 3 - Traffic and street network and Hotspots. Public Transport See Theme 3 - Public transport. Active transport See Theme 3 - Active transport - Walking and cycling Off-street parking See Theme 3 - Off-street parking. Implementation The Yarra Transport Strategy highlights the issue of parking revenue and a user pays model. This may also be addressed through the

- State the desired urban form - identify hierarchy for spaces - Provide estimates of people, residents, and goods for each street identifies the ideal modal split between transport modes Provides a redesign of each street to a three identified modal split Supportive of the proposal for 30km/h speed limits Recommends a series of modal filters with are defined by restricting or prohibiting vehicle traffic while allowing the movement of other forms of traffic. Example Albert Street near Abbotstord Primary Proposes the following alternative approaches for managing access and movement Prescribed footpath widths determined by location and role Intersection Swan and Cremorne Streets (Hotspot 3); - Remove left turn lane on Cremorne Street - Add protected bike lanes to Cremorne Uber drop-off and pick-up points: - Drop-off points should be identified Suggest - Dale Street just off Church Street and State Government land near swan and Cremorne Corner Intersection Balmain and Cremorne Streets: - Support the proposal with changes Add raised wombat rossing at multiple locations Intersection Balmain and Church Streets - supports with some improvements - Continuously protected bike lanes should be added Intersection Balmain and Church Streets and State Government Stand Harcourt Street Proposed plaza along Cremorne Street if "modal filter" is placed at Cremorne St and Harcourt Street Plaza outside Cherry Tree Hotel (Balmain Street): - If traffic volumes can be reduced through a "modal filter" is placed at Cremorne St and Harcourt Street Plaza outside Cherry Tree Hotel (Balmain Street): - If traffic volumes can be reduced through a "modal filter" in expanded plaza could be proposed. Public Transport - Richmond Station redevelopment - the station should include commercial, public housing and secure undercover bike parking. Active transport - A New Deal for Walking - Every building should be wheelchair accessible Footpath widehing.	Sub No & Interest	Summary	Response
 A New Deal for Cycling Promotes modal filters for underpasses 		 Identify hierarchy for spaces Provide estimates of people, residents, and goods for each street. Identifies the ideal modal split between transport modes. Provides a redesign of each street to achieve identified modal split. Supportive of the proposal for 30km/h speed limits. Recommends a series of modal filters which are defined by restricting or prohibiting vehicle traffic while allowing the movement of other forms of traffic. Example Albert Street near Abbotsford Primary. Proposes the following alternative approaches for managing access and movement. Prescribed footpath widths determined by location and role. Intersection Swan and Cremorne Streets (Hotspot 3): Remove left turn lane on Cremorne Street Add protected bike lanes to Cremorne. Uber drop-off and pick-up points: Drop-off points should be identified. Suggest - Dale Street just off Church Street and State Government land near Swan and Cremorne corner. Intersection Balmain and Cremorne Streets: Support the proposal with changes. Add raised wombat crossing at multiple locations. Intersection Balmain and Church Streets – supports with some improvements Continuously protected bike lanes should be added. Intersection Cremorne and City Link: Proposed plaza along Cremorne Street if "modal filter" is placed at Cremorne St and Harcourt Street. Plaza outside Cherry Tree Hotel (Balmain Street):	 Part 4 of the UDF identifies opportunities for grant and funding bids. The revised UDF also identifies an extensive list of advocacy projects. Council will need to work with the State Government and its agencies and the City of Melbourne and Stonnington to achieve some of the

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	 Underpass at Dunn Street: Ideally, a modal filter be put in place If not, a wombat crossing should be installed. Underpass at Balmain Street: Suggests footpath and bike lane widening is required and possible widening of the whole underpass. Access to Swan Street (Green Street underpass) should be improved. Access to South Yarra Station (Oddys Lane and Railway bridge) should be improved and made DDA compliant. Off-street parking Supportive of the proposed car parking maximums. Implementation Funding and Implementation Suggestion for paid on-street parking to raise revenue for implementation Suggest State Government funding for Balmain and Green Street underpasses. Provides links to further information (both external and Streets Alive). 	
8 Resident Cremorne	 Overall support for the draft UDF and its prompt implementation. Built form - General Concern that developments will be approved prior to the implementation of the UDF. Wants the prompt implementation of strict development controls. Architecture should be reflective of unique character and include public art. Building heights Concern 10-storey is too high for the area, limit of 7 to 8-storeys for large developments. ESD Supports a strong focus on sustainability. Street network and hotspots Concern the street network proposals require further planning. Supportive of the implementation of shared zones prioritising pedestrians and cyclists. Suggests this typology for Cremorne Street Proposes some streets to be modelled on the Dutch "Woonerven" approach and a speed limit of 20km. Supports limiting commercial car parking and limits to on-street parking. Supports the signalisation of Punt Road and Kelso Street (subject to further consideration of Cremorne Street and Kelso Street intersection). Further, thought is needed on the Cremorne/Kelso intersection. Public transport Supports the revitalisation of train stations and better connectivity to Metro lines. 	 Built form - General Interim planning provisions are proposed for Cremorne. Building heights See Theme 5 – Building heights. ESD See Theme 2. Street network and hotspots See Theme 3 - Traffic and street network and Hotspots. Public transport See Theme 3 – Public transport. BKI – community hub See Theme 4 - Community facilities and spaces.

Sub No & Interest	Summary	Response
	 BKI – community hub Supports the establishment of a community hub (within BKI). 	
9 Resident No address provided	 Draft UDF is a "big picture view" of Cremorne in the future but does not address day to day issues. Overall concern that the draft UDF priorities workers, not residential liveability. Street network and hotspots Concern about some of the road closures, i.e. Cremorne/Kelso intersection. Traffic issues are concentrated on peak times. Concerned street network changes will create more congestion. Suggests stopping traffic entering the suburbs or a financial toll system. Concern about closing freeway entrance. On-street parking Stricter parking (i.e. 1hr) would discourage workers from driving. Off-street parking Concern about off street parking maximums will further street parking issues. Active transport – walking and cycling Not supportive of dedicated cycle infrastructure due to low numbers and considers it safe to share the road with vehicles currently. Suggests footpath maintenance and clearing of clutter instead of widening. Public transport Suggests reopening Cremorne Railway Station. 	 Street network and hotspots See Theme 3 - Traffic and street network and Hotspots. On-street parking See Theme 3 - On-street parking. Off-street parking See Theme 3 - Off-street parking. Active transport - walking and cycling See Theme 3 - Active transport - walking and cycling. Public transport See Theme 3 - Public transport.
10 Commercial landowner Birrarung Precinct	 Rosella Strategic Site Primary function of Palmer Parade is loading, access, servicing (in keeping with C2Z zoning). This is incompatible with a suggestion to create a pedestrianised environment. Location of potential new open space At odds with current use as a communal car park (s173 agreement) Open space within the southern portion is unwarranted given Balmain Plaza provision immediately north. Identifies two parcels that should recognised as key development sites (large and unrestrained by heritage). One has a planning permit for a 7 storey office development. Attachments include car park S173 agreement and planning permit. 	Rosella Strategic Site • See Strategic Sites – Rosella Strategic Site
11 Commercial landowner	 Street network and hotspots Street Network changes do not consider servicing requirements: Not supportive of changes to Cremorne Street Need to consider the specific needs of office, retail, and hospitality uses 	 Street network and hotspots See Theme 3 - Traffic and street network and Hotspots. Street setbacks

Sub No & Interest	Summary	Response
Cremorne West Precinct and Church Street Precinct	 Recommendation – Greater acknowledgement of servicing requirements for the proposed uses with the draft UDF, including maintaining two-way vehicle movements along key streets such as Cremorne Street. Not supportive of Cremorne Street closure to through traffic Preference for two-way access on Cremorne Street to be maintained. Will result in negative impacts on smaller streets as vehicles shortcut. Supports the introduction of low speed environment on Cremorne Street Recommendation – Maintain Cremorne Street as a two-way directional roadway with full movements at Kelso Street. Cremorne Street should be subject to a low-speed shared arrangement for vehicles, cyclists, and pedestrians, including the provision of appropriate landscaping. Street setbacks Generally supportive of building setbacks but on a case-by-case basis. Remove the proposed mandatory minimum 3m front setback (whole of a building) on the western side of Cremorne Street, between Swan Street and Gough Street. Site widths and approved development trends prevent implementation. Building heights Overall support for height ranges and use of discretionary controls:	 See Theme 5 - Street and ground floor setbacks. Building heights See Theme 5 - Building heights. Mandatory controls See Theme 5 - Mandatory vs discretionary built form controls. Interim controls See Theme 5 - Interim planning controls and transitional provisions.
Commercial landowner Church Street Precinct	 Supports the designation as a strategic site. Supports (in part) the vision statement for the site. Does not support the design objectives, as these: Do not consider the complex conditions (ownership, heritage etc.) Premature and prejudiced future master planning 	 See Strategic Sites – Bryant and May Strategic Site.

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	 Suggests amending the vision statement to remove reference to: Adelaide Street as a 'green street' the retention of heritage tennis courts and pavilion a landscaped setback along Balmain Street Proposes Russell Street (central internal private road) as the green street: historical main entrance to the site framed by heritage on both sides contributes to broader permeability The concept of a green shared street. 	
Commercial landowner Cremorne West Precinct	 Submitter did not receive an initial letter, only secondary correspondence. Note that due to time constraints, a secondary submission may be made. Upper level setbacks Concern with overshadowing and upper-level setback requirements: Little merit or benefit to overshadowing and use of mandatory controls Balmain Plaza is currently largely overshadowed between 11 am-2pm The proposed use of the space (Hotspot 4 concept design) is not public space akin to a public park. Content that 15m setback is not required to meet overshadowing. Recommend removing upper-level setbacks and making overshadowing requirements preferred not mandatory. Proposed controls unreasonably compromise development potential. 	 Upper level setbacks See Theme 5 – Upper level setbacks.
14 Resident Cremorne	 The diversity of residents in Cremorne need to be considered as part of this process. Off-street parking New developments should accommodate all vehicle demands within their building. Alternatively, all on street car parking be reserved for residential uses. A parking permit audit should be undertaken. Street network and hotspots Concerns and suggestions relating to traffic and parking: Parking for all future commercial development is to be contained within the site rather than on-street parking. Future development must complement the residential amenity and ensure sustainable outcomes for the future of Cremorne. Rather than removing on-street bays, it is suggested that parking should only be made available for residents. Active transport is not a convenient method of transport for those who have families and will be transporting before and after business hours. Concerns that the residents will be of detriment with the implementation of this proposal. 	 See Theme 3 – Off-street parking. Street network and hotspots See Theme 3 - Traffic and street network and Hotspots. Precinct visions The draft UDF does not propose to apply new planning provisions to the residential precincts - Wellington Street Precinct, Cremorne Precinct and Green Street Precinct. These areas are predominantly covered by a Heritage Overlay. There are sufficient planning provisions in place to guide development in these areas. A specific precinct vision for the residential areas is not considered necessary. However, an action that was accidently omitted from the draft has been reinstated: Action 1.5.2 Continue to support the established character of Cremorne's residential precincts.

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	Precinct visions • Vision for the residential precincts is lacking.	
15 Resident Cremorne	 Street network and hotspots Strong concern that the street network changes will unfairly impact vehicular movements for residents, particularly regarding the proposal on Cremorne Street, Kelso Street, Balmain Street and Cotter Street in particular). Cremorne Street should remain open to two-way traffic with some traffic calming measures. Leave these roads as is and adopt other methods to manage traffic congestion, whilst also protecting pedestrian safety. Kelso Street should be left unchanged with the exception of some tree planting. No signalisation of Kelso and Punt Road. Balmain Street and Cotter Street should remain unchanged. Improve the proposal for Balmain Street between Gwynne Street and Stephenson Street, such as the retention of bollards to protect pedestrian safety. Widening footpaths is desirable but retaining on-street parking is a priority. Improve accessibility to Harcourt Parade and the area under CityLink. Community consultation Additional detailed community engagement is requested to ensure the resident can discuss comments further. 	 Street network and hotspots See Theme 3 - Traffic and street network and Hotspots. Community consultation Additional detailed community engagement is proposed on the revised UDF and proposed planning controls.
16 Resident No address provided	 Generally supportive of framework overall and implementation (with suggestions for Theme 3 and Theme 4). Street network and hotspots The following summary of suggestions for Theme 3: Option A requires further improvement. Option B does not improve walkability and cycling routes. Additional detailed community engagement is requested to ensure the residents are fully aware of the proposed changes. Crossings on Cremorne Street/Balmain Street and Swan Street/Cremorne Street should be prioritised, whilst removing the left turn lane on Swan/Cremorne and replace with a bicycle lane. Upgrading the intersection at Church Street and Balmain Street should be prioritised. Consider making Cremorne Street, Swan Street, and Stephenson Street shared zones due to constraints in width – an attempt to reduce rat-running within Cremorne. Additional pedestrian/bicycle crossing on Church Street/Lesney Street. Adding bicycle lanes on Gough Street or Kelso Street and turning the eastern footpath on Punt Road into a shared path. 	 Street network and hotspots See Theme 3 - Traffic and street network and Hotspots. Open space See Theme 4 - Specific locations for new open space / public spaces; and Community facilities and spaces.

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17 Commercial landowner Cremorne West Precinct	 Suggestion for a specific business-targeted program to be implemented to reduce car dependence. Open space Government agencies (VicTrack, VicRoads, and Department of Education) who own land within the area can assist in providing additional required space for public open space and public amenities. Suggests a new boat ramp or jetty on the Cremorne side of Punt Road. Supportive of a UDF for Cremorne, but generally opposes the controls and objectives surrounding built-form and sustainable outcomes. Building heights, street wall and street setbacks Concerns that the restrictions regarding built-form – building height, street wall heights, and street setbacks – will not reflect the existing development within Cremorne. Compensate through a built-form (additional height) if achieving excellent ESD. Interim planning controls Strongly concerned about the interim planning control methods implemented and the restrictions these would have on the ability for landowners to develop their sites. Overshadowing Needs to be a careful balance between protecting solar access to the public and private realm and the aspirations of continuing the development of Cremorne as a Global Innovation Precinct. The protection of the amenity of dwellings in a residential zone but at an interface with a commercial zone and precinct, whilst deserving of some protection, cannot be protected to the same extent as if its interface was with residentially zoned land. The UDF does not strike this balance. Street network and hotspots Concerns that the street network changes will cause traffic flow issues and request further analysis is completed prior to proceeding. Net zero development Concerns and difficulties regarding the requirement for net zero requirements for the precinct. Mandating net zero carbon emissions for a	Building heights, street wall and street setbacks See Theme 5 – Building heights; and Street and ground floor setbacks. Interim planning controls See Theme 5 – Interim planning controls and transitional provisions. Overshadowing See Theme 5 – Residential amenity; and Impacts on the public realm. Street network and hotspots See Theme 3 - Traffic and street network and Hotspots. Net zero development See Theme 2 - Net zero carbon emissions and greening buildings.
18	Mandatory vs discretionary built form controls	 Mandatory vs discretionary built form controls See Theme 5 - Mandatory vs discretionary built form controls.

Sub No & Interest	Summary	Response
Commercial landowner Railway Precinct	 Generally supportive of the framework overall and implementation; on the basis that the built-form controls are discretionary. Requests the development of performance criteria for developments proposing to exceed a preferred built-form control, such as demonstrating exceptional design quality, ESD outcomes, public realm outcomes, inclusion of social housing and community facilities. Overshadowing – public realm / footpaths The overshadowing controls create difficulties for development. The submitter suggests that a site-responsive approach to overshadowing controls are more appropriate than definitive controls due to the following reasons: There are no residential zoned properties on the eastern side of Balmain Street. The UDF already considers shadow impact on properties through differing heights/maximum storey numbers to both sides of Balmain Street. The built-form controls proposed as part of the UDF obviates the need for shadow controls. Context of the area is two locally-significant heritage properties and the Bryant and May site (which includes a proposal for a new park) – mandatory overshadowing controls are not needed. Building heights and setbacks Concern that the height and setback controls make it difficult for development on sites which may be constrained. Uniform heights across the Railway Precinct conflict with the vision. Height limitations should allow for architectural ingenuity and flexible design outcomes that respond to the specific opportunities and constraints offered by individual sites Increase height requirements to benefit taller buildings have on achieving views to open spaces, opportunity for a notable landmark within the area, and greater activation and surveillance. 	Overshadowing – public realm / footpaths See Theme 5 - Impacts on the public realm and Mandatory vs discretionary built form controls Building heights and setbacks See Theme 5 – Building heights.
19 Commercial landowner Church Street Precinct	 Mandatory vs discretionary built form controls Generally supportive of the framework overall and implementation on the basis that the built-form controls are discretionary. Building heights and setbacks The vision for Church Street as outlined in the UDF intends to see the development up to 10-storey however, the UDF restricts development of a seven-storey building for this subject site. Suggestion to increase the overall height control on this site to 40m given it is located on Church Street (defined by taller buildings as per the UDF), serviced by public transport, well-separated and buffered, no heritage fabric, deep block, side street streetscape and is a corner allotment. The draft UDF and built-form framework acknowledges that Church Street should accommodate taller development. Recommends the land should have a 40m height limit rather than 28m. 	 Mandatory vs discretionary built form controls See Theme 5 - Mandatory vs discretionary built form controls. Building heights and setbacks See Theme 5 - Building heights. Building separation See Theme 5 - Building separation. Street wall and upper level setbacks See Theme 5 - Street wall heights and active frontages and Upper level setbacks.

Sub No & Interest	Summary	Response
	 The submitter suggests a 10-storey development/40-metre development on this site will still be able to comply with the UDF's footpath shadow provisions. The submitter suggests that a site-responsive approach to height and/or setback controls is more appropriate than definitive. Building separation Should not include building separation controls to the neighbouring building. 	
	 Street wall and upper level setbacks The UDF should clearly articulate a preference for a maximum street wall height of 3-storeys to Pearson Street, a preferred upper-level setback of 3.0m to Pearson Street, and guidance as to 	
	how an applicant is expected to transition street wall heights from Church Street to side streets.	Public transport
20 Resident Cremorne	 Generally supportive of the initiatives put forward in the UDF Public transport An update to the East Richmond train station would be supported however, more frequent trains would be required. Trains are not frequent enough and express services often skip this station. Negotiations are needed with Metro Trains to make the station more user-friendly. On-street parking Is there a way to have residents only parking. Providing an exception for trades persons and deliveries to reduce road congestion. Off-street parking Reducing the car parking provided in new apartment developments would encourage people to use public transport and in turn reduce road congestion. Active transport – walking and cycling Pedestrian and bike safety should be prioritised as much as cars. Open space All future developments should include green space. A good example of this is 510 Church Street and mini parks. 	 See Theme 3 – Public transport. On-street parking See Theme 3 – On-street parking. Off-street parking See Theme 3 – Off-street parking. Active transport – walking and cycling See Theme 3 – Active transport – walking and cycling. Open space See Theme 4 – Open Space Development and Specific locations for new open space / public spaces.
21 Commercial landowner Church Street Precinct	 Mandatory vs discretionary built form controls Generally supportive of the framework overall and implementation, on the basis that the built-form controls are discretionary (not mandatory). Potential strategic site The subject site presents an opportunity to become a strategic site that allows for making the best use of such a large and regular-shaped parcel of land. 	 Mandatory vs discretionary built form controls See Theme 5 - Mandatory vs discretionary built form controls. Potential strategic site The draft UDF identifies seven strategic sites which are large and complex sites that present development opportunities.

Sub No & Interest	Summary	Response
	 The submitter suggests that a site-responsive approach for sites with no impact on sensitive interfaces is more appropriate than definitive controls. Building heights Increase the overall height control on these sites to a minimum of 10-12 storeys rather than the control of 28 metres, where there are no sensitive boundaries (residential, common boundaries, benefits from visual amenities). Street wall height and upper level setbacks Increase the overall street wall height from 12m (3-storeys) to a maximum of 4 storeys and street setback from 3 metre to a minimum of 1 metre. Building separation and boundary wall heights Side and rear boundary wall heights of 20m with a 3m setback above to be amended to a setback between 1–3 metres tempered by the site interface. Interim planning controls If interim controls are implemented, there should be transitional provisions associated with amendments to existing permits and applications made prior to the approval date. Street network Balmain Street (between Church Street and Punt Road) to remain as a two-way street given the benefit for the precinct and two-way movement is a key driver for future tenant demand. 	 These sites present opportunities to realise community benefits including through site links, new walking and cycling connections and opportunities for much needed open space. The draft UDF flags that further work will be undertaken with landowners to inform more detailed master planning of the sites. This would further explore built form parameters and consider planning scheme mechanisms. 118-124 Balmain Street has a current planning permit for a development of 9 storeys. An amended permit is being sought for 10 storeys. It is understood development is proposed for the westerly site. As a planning permit has been issued for half the site and another is mooted, there is little opportunity for master planning this site. It is therefore not recommended for inclusion as a strategic site. Building heights See Theme 5 – Building heights. Street wall height and upper level setbacks See Theme 5 – Street wall heights and active frontages and Upper level setbacks. Building separation and boundary wall heights See Theme 5 – Building separation. Interim planning controls See Theme 5 – Interim planning controls and transitional provisions. Street network See Theme 3 - Traffic and street network and Hotspots.
Commercial landowner Cremorne West Precinct	 Mandatory vs discretionary built form controls Generally supportive of the need for the framework but oppose to the built-form controls, specifically the impact these will have on the growth of Cremorne. Interim planning controls Interim planning controls will compromise the ability to develop sites to their full potential. Suggest waiting to introduce the controls until the completion of a detailed process. Building height, street wall heights, and street setbacks Concerns that the built-form controls: building height, street wall heights, and street setbacks – will not reflect the existing development within Cremorne. Built-form review has taken an overly conservative approach. Overall building heights are not supported. They are inconsistent with the emerging and approved character of Cremorne. 	 Mandatory vs discretionary built form controls See Theme 5 - Mandatory vs discretionary built form controls. Interim planning controls See Theme 5 - Interim planning controls and transitional provisions. Building height, street wall heights, and street setbacks See Theme 5 - Building heights; Street wall heights and active frontages; and Street and ground floor setbacks. Increasing width of laneway The proposal in the UDF is for a ground floor setback to enhance the functionality of laneways and improve the public realm. Net Zero Carbon Emissions

Sub No & Interest	Summary	Response
	 Increasing width of laneway Concerns regarding the requirement to increase the width of a laneway where a property extends the full length of the laneway or street. Submitter suggests including compensation measures if achieving this requirement, such as bonus height provisions. Net Zero Carbon Emissions Concerns and difficulties regarding achieving net zero. Should be compensated for achieving excellent ESD, such as bonus height provisions. Overshadowing – public realm Concerns that this requirement is overly restrictive and not strategically justified. The requirements to protect residential front gardens in Balmain Street go beyond those in a residential area and do not take into consideration their interface location to an employment precinct. Building services Substations to be located below ground – this requirement should only be "when possible" rather than mandatory given the substation locations are determined by the power authority. Street network Closure of Cremorne Street to through-traffic would reduce the permeability of the precinct by limiting access to Swan Street and will direct more traffic to Church Street and Punt Road. Alternative Streets Implementation Plan – making Balmain Street one-way (between Gwynne and Cremorne Streets) will result in traffic congestion which will impact on amenity, residents, and businesses. Suggestion to restrict access to an area there is already an established lack of permeability, rather than Balmain Street. Off-street parking Parking Overlay is an appropriate response to addressing parking in Cremorne – agree with applying a maximum number of bays required rather than a minimum to reduce the level of car parking in the area. 	 See Theme 2 - Net zero carbon emissions and greening buildings and Theme 5 - Measurement of building heights. Overshadowing – public realm See Theme 5 - Impacts on the public realm and Mandatory vs discretionary built form controls. Building services See Theme 5 - Street wall heights and active frontages. Street network See Theme 3 - Traffic and street network and Hotspots. Off-street parking See Theme 3 - Off-street parking.
23 Unknown Cremorne West Precinct	 Community engagement Your Say Yarra page doesn't allow for open feedback. Concern regarding the time it has taken to progress since the CPIP. Street network and hotspots Existing traffic issues in the area are due to overdevelopment. Does not support Hotspot 1 – particularly the additional traffic lights proposed on Punt Road. Does not support the bike path on Kelso Road as cyclists can take alternate routes along Swan Street or the Yarra River. Does not support Hotspot 2: Removal of access to Swan Street from Cremorne Street is a problem. Stephenson Street already banks up traffic. 	 Community engagement Work on the draft Urban Design Framework and planning controls has progressed as quickly as possible. Street network and hotspots See Theme 3 - Traffic and street network and Hotspots.

Sub No & Interest	Summary	Response
	 Closing Cremorne and Kelso Street will increase traffic on smaller neighbouring streets. Does not support Hotspot 5: Changing Cotter Street to one way traffic will affect residents travelling to the primary school. The inclusion of bike lanes on Balmain Street and Cotter Street is unnecessary. The closure of the on- ramp to CityLink from Cremorne Street. This will increase traffic at the Gough Street entrance which can be dangerous. Supports Hotspot 3 as people currently cross on the diagonal on Swan Street and Cremorne Street. More information required: What is a 'shared space' is defined as in Hotspot 4. Widening the footpaths under rail bridges will reduce road space for cyclists. Traffic count for cyclists to warrant the inclusion of bike lanes on Kelso, Balmain, and Cotter Streets. What data was used from the original focus groups? Suggests Council read the comments from The Cremunity Facebook page. 	
Commercial landowner Birrarung Precinct	 Interim planning controls Previously engaged with Council over the lack of specific built-form controls. Supportive of interim controls due to development pressure. Otherwise, new large-scale development will continue to set the benchmark. Interim controls should be placed on strategic sites. Open space and connections to the river A network of open spaces should link outside of Cremorne. Oddys Lane can be used as a public open space that links Green Street to the railway bridge. Support the proposals for improved the bike and pedestrian crossing of the river at Oddys Lane. Better connect the railway bridge to the Main Yarra Trail and increase accessibility. Should include a requirement for Traditional Owners to be consulted on the visual impact of the Yarra River. State Government in collaboration with strategic site owners should provide more open space. Consult traditional custodians in the design and naming of streets, parks, and public buildings. Council should support public realm improvements such as 658 Church Street. Affordability Affordability is an important factor in maintaining diversity, vibrancy, and creativity. Digital infrastructure Should provide digital infrastructure and high-speed broadband. Built form - midrise 	 Interim planning controls See Theme 5 – Interim planning controls and transitional provisions. Open space and connections to the river See Theme 4 - Connections to the Yarra River and Theme 5 – Impacts on the Yarra River. Affordability See Theme 1 - Affordable and diverse workspaces. Digital infrastructure A Digital Infrastructure Plan is an action in the Cremorne Place Implementation Plan. Work on this issue is underway through the Department of Jobs, Skills, Industry and Regions (DJSIR). Built form - midrise See Theme 5 – Measurement of building heights. Public transport See Theme 3 – Public transport. Urban forest and green buildings See Theme 2 - Greening streets (Urban forest). Street network and hotspots See Theme 3 - Traffic and street network and Hotspots. Mandatory vs discretionary planning controls

Sub No & Interest	Summary	Response
	 Enhance links to Richmond, East Richmond, and South Yarra Station. Urban forest and green buildings 25% canopy cover increase should be delivered prior to 2040. Create an urban forest and green buildings. Street network and hotspots Redesign of gateway intersections and traffic hotspots and other traffic mitigation works can be funded by Development Contributions and should be costed and put into the Capital Works Program; Widen footpaths and increase building setbacks. Should be an alternative payment in lieu of on-street parking to assist in the funding of infrastructure works. Mandatory vs discretionary planning controls Built-form controls should be mandatory to stop incremental alterations to heights and setback benchmarks. Active street frontages Provide activated street frontages and breaking up wide street frontages into more vertical elements. Laneways Existing laneways should be retained and not amalgamated in larger developments. Planning Department should review laneway closure proposals. Also supports the proposal to increase the width of existing laneways and streets to 6m where property exists the full length of the laneway or street. Heritage Built-form controls to apply to buildings across from heritage buildings. Through site links Landowners should be consulted before their land is nominated as a link. Precinct visions In several instances, the Vision Statements for the Precincts have already been eroded or overtaken with the ongoing developments. 658 Church Street – Strategic site The draft UDF encourages height on the northern portion of the site, the opposite to the Cremorne Built Form Review (Hody) & Co). Owners of the sit	 See Theme 5 - Mandatory vs discretionary built form controls. Active street frontages See Theme 5 - Street wall heights and active frontages. Laneways Support for laneway proposals is noted. Heritage See Theme 5 - Heritage. Through block links See Strategic sites - Through site linkages and open space. 658 Church Street - Strategic site See 658 Church Street - Strategic site. Implementation The UDF flags that amendments will be required to Development Contributions Plan. (Updates to the public open space contribution rate are in train.) The list of projects will need to be finalised and then costed before this occur. This work will occur once the UDF has been finalised and adopted by Council.

Sub No & Interest	Summary	Response
25 Former employee, Cremorne	 Improvements to walking and cycling connections and the public realm are needed along Oddys Lane. Implementation The current Open Space Contribution Plan and Development Contribution Plan in the Planning Scheme are tied to a defined list Council's capital works and maintenance budgets. It is unclear as to what further amendments will be contemplated to cover the infrastructure identified by the Draft UDF. A previous employee of Cremorne. Supportive of the overall framework and implementation. Requests additional information such as the Cremorne Place Implementation Plan. Heritage 	Heritage • See Theme 5 - Heritage
	 The history and heritage of Cremorne needs to be recognised and preserved through the UDF – implementing plaques, signage, murals. 	
Commercial landowner Church Street Precinct	 Broadly supports the UDF. Building heights Clearer rationale is needed regarding location of height transitions in the controls. The area identified on Church Street between Yarra and Prince Patrick Streets has a 10-storey max building height. 10-storey height that applies to the land on the corner of Church and Yarra Streets does not extend as far east as other areas adjacent to the site. Seeking clarification on the rationale of height transitions. Land bound by Church St, Yarra St, and Prince Patrick St is identified for a max height of 7-storeys at the rear despite being part of an approved 10-storey building. Neighbouring property that fronts Yarra Street is identified as 7-storeys despite sharing two boundaries with a property with an approved application to build a 10-storey building. Concerns about mandatory building heights for heritage building. Could be restrictive for future development if sites are consolidated. Suggests for the land bound by Church Street, Yarra Street, and Prince Patrick Street, the 10-storey height should extend further east. Expand the area identified for 7-storey development given the future context opposite the site and to the south. 	 See Theme 5 – Building heights. 6 Yarra Street is in HO406 – a 12m preferred / discretionary maximum height is proposed to apply – not a mandatory height.
Co Create Cremorne Community group	 Supportive of overall framework and implementation. The submitter has provided an overall vision of Cremorne which focuses on improving sustainable outcomes, road network and amenities, retaining heritage, and encouraging new businesses. Local businesses 	Local businesses • See Theme 1 - Affordable and diverse workspaces. Active transport • See Theme 3 – Active transport – Walking and cycling. Street network and hotspots

Sub No & Interest	Summary	Response
	 Scenario where massive oversupply of commercial office has meant many businesses have moved away due to increasing land tax and rates. Now cheap rent a new mix of retail and other businesses open up, where creative and tech businesses once were. Future of Cremorne could be in discount high fashion outlets. Kelso Street is a pedestrian café highway. Bendigo Kangan Institute BKI moves into education on climate change, sustainability and technology. The site has community spaces and has become a space for various themes. E.g. active transport – bike tech, bike repair, bike parking facing the street. Implementation - funding Create a fund for Cremorne – contributions to be provided by developers, tenants, local businesses, landowners, community and fundraising, etc. Active transport Implement a program/scheme to encourage active transport, in particular targeting the larger companies/employees within the Cremorne area. Then rolled out to smaller companies. Create an active travel survey – provides a baseline. Would then be repeated 6 months later. Funding / subsidising public and active transport by requiring a small fee for parking. Ferry from Cremorne to the city. Free open to sky shuttle –could be trialled. Could provide include information about Cremorne, 	 See Theme 3 - Traffic and street network and Hotspots. Open space See Theme 4 – Open space development and Theme 2 - Impacts on biodiversity. Community facilities and spaces See Theme 4 - Community facilities and spaces. Reconnecting with the river See Theme 4 – Reconnecting with the river.
	Street network and hotspots	
	 Ensure the road network allows for efficient traffic flow and avoids traffic to the residential streets. Recommends that streets in Cremorne West be refocused as places that prioritised for pedestrians, active travel, and small spaces to gather and sit. People walk on the streets. Trial the "Ratio Loop" that was presented by Ratio Consultants. 	
	Open space	
	 Create more public open space such as a chain of pocket parks and larger spaces. Make night skies dark next to Birrarung. Impacts on the wildlife such as the tawny frogmouth owl. 	
	Community facilities and spaces	
	 Additional amenities for children throughout Cremorne, such as play equipment. Implementing a boat ramp in Cremorne to allow more efficient access to the river. Links back to Wurundjeri and Cremorne Pleasure Gardens. 	
	Reconnecting with the river	
	Places on the river to enjoy. Floating pontoons.	

Sub No & Interest	Summary	Response
Cremorne Community Inc Community group	 Generally supportive of the vision of the draft. Street network and hotspots Supports improved amenity and access Supports shared zones and intersection upgrades Concerned that the UDF places disproportionate emphasis on the main vehicle traffic routes rather than the multitude of smaller streets. Current footpaths are inadequate for pedestrians and inaccessible for pushers and wheelchairs. This will be exacerbated by the planned commercial and retail use. Narrow streets are unsafe and discourage pedestrians and cyclists. UDF should align with the Cremorne Community Inc survey (2023). Suggestions: Creation of 'Shared Streets' in Dover, Cubitt, Gwynne, Fitzgibbon, Dove, and Kelso (East) Streets Coloured marking on road in the shared use zone Expand tree and garden plantings and public spaces along designated stretches Traffic speed management such as speed bumps and road constrictions Integrate streetscapes Restriction of traffic volume through: Permit only parking and added street plantings Encourage through traffic to keep to Cremorne and Balmain Streets Revenue from non-resident parking to contribute to local public amenity Incentivise alternative and public transport Clear traffic signage. Investigate the Ratio loop option at Cremorne, Stephenson and Balmain Streets. Built form — General Supports built-form controls. Building heights Concerns that new large office developments will disrupt the existing character. Overdevelopment of commercial buildings up to 10-storeys. Open space Supports identification of open space opportunities. Further opportunities for open space: Beneath the tollway overpass on Punt Road Existing car park a the top of Stephenson Street Gough Street at Cremorne St	 Street network and hotspots See Theme 3 - Traffic and street network and Hotspots. Built form – General Support for built-form controls is noted. Building heights See Theme 5 – Building heights. Open space See Theme 4 – Specific locations for new open space / public spaces.
29	Building heights, street wall and upper level setbacks	Building heights, street wall and upper level setbacks

Sub No & Interest	Summary	Response
Government landowner Railway Precinct	 Recommend amendments to the built-form recommendations for the site: Increase overall building height from 7 to 11-storey. 7-storeys does not reflect the island nature of the site and emerging and approved built-form. Increase maximum street wall height from 3 to 3 and 4-storeys. Does not take account of development opportunities or facilitate innovative design. Support 3m upper-level setback (excluding architectural features) Interim planning controls Not supportive of interim controls. Recommends transitional provisions for existing applications. Open space opportunity area Not supportive of the inclusion of vision for new public open space on the site. Acknowledges that Government bodies can play a role in providing public realm upgrades but these need to be appropriate. Notes that access and servicing maintenance access need to be retained. Suggest public realm upgrades apply to site edges only (i.e. streetscape). 	 See Theme 5 – Building heights. Interim planning controls See Theme 5 – Interim planning controls and transitional provisions. Open space opportunity area Theme 4 - Specific locations for new open space / public spaces.
Commercial landowner Cremorne West Precinct	 Generally, supports the overall vision of the Cremorne West Precinct. Building heights Maximum building height of 7-storeys is not an accurate reflection of the development opportunity of the site. Does not consider existing conditions or permits along Gwynne Street, Cubitt Street, and the surrounds. No residential interfaces within 100m of the site. A maximum building height of 10-storeys to be applied to the site. A recognition within the UDF that consolidated sites represent a greater development opportunity. The inclusion of 'overall' when referencing the preferred building heights be deleted as it would not allow rooftop plant and equipment to exceed the height. Street wall heights and upper level setbacks A maximum street wall height of 4-storeys be applied to the precinct. Supports the provision of minimum upper-level setbacks. A minimum upper-level setback of 3 metre be applied to the precinct. However, greater discretion should be built into the controls to allow for innovative architectural / design elements to encroach into the setback requirement. Interim planning controls Supports the introduction of new planning controls via a formal Planning Scheme Amendment but does not support interim controls. Transitional provisions for existing applications should be included within any subsequent built-form controls. 	 Building heights See Theme 5 – Building heights. Street wall heights and upper level setbacks See Theme 5 – Street wall heights and active frontages; and Upper level setbacks. Interim planning controls See Theme 5 – Interim planning controls and transitional provisions.

Sub No & Interest	Summary	Response
Commercial landowner Cremorne West Precinct	 Generally supportive of the overall vision of the Cremorne area and Cremorne West precinct. Building heights Supportive of 7-storey building height designation for the site. Concerns about the use of 'overall' when referencing preferred building heights. Could be interpreted differently from building height definition in the planning scheme and in turn does not allow rooftop plants, overruns etc. Recommends deletion of the word 'overall'. Street wall heights and upper level setbacks A maximum street wall height of 4-storeys be applied to the site and surrounds. The proposed 3-storey street wall is inconsistent with the emerging built-form character and will compromise redevelopment opportunities. A minimum upper level setback of 3 metres be applied to the precinct. However, greater discretion should be built into the controls to allow for innovative architectural / design elements to encroach into the setback requirement. Interim planning controls UDF to state that no interim controls would be sought as part of the Amendment implementation process and transitional provisions for existing applications will be included within any subsequent built-form controls. 	 Building heights See Theme 5 – Building heights and Measurement of building heights. Street wall heights and upper level setbacks See Theme 5 – Street wall heights and active frontages; and Upper level setbacks. Interim planning controls See Theme 5 – Interim planning controls and transitional provisions.
Commercial landowner Church Street Precinct	 Generally supportive of UDF provisions that are enabling rather than restrictive. Specifically: Design Objective 2 - Permeability Design Objective 3 - Provision of open space Support the preparation of the UDF but comments that any new provisions should not be restrictive. Concerns about the green shared street on Adelaide Street. Service areas for any redevelopment would need to be orientated to the south. Makes suggestions around the Design Objectives: Building massing - Heritage and contemporary infill building forms should be juxtaposed. Support permeability but remove reference to framing heritage buildings. In terms of open space – need to coordinate with the adjacent landowner to ensure the location of open space is fair. Publicly accessible open space should be delivered in a contemporary format i.e., not just parks No need for the landscape setback on Chestnut Street Clarify that overshadowing needs to meet the 10 am-2 pm equinox test. Russell Street should be the green shared street as it is surrounded by heritage buildings – rather than Adelaide Street suggested in the UDF. Consider services that need to be facing Adelaide Street. 	 Bryant and May Strategic Site See Strategic Sites – Bryant and May Strategic Site. Zoning of property to the north 51-71 Chestnut Street is zoned GRZ2. This is not considered a zoning anomaly. GRZ2 is considered an appropriate zone given the site's context opposite further residential zones. Interim planning controls See Theme 5 – Interim planning controls and transitional provisions.

Sub No & Interest	Summary	Response
	 UDF should support taller building developments to offset public benefits such as heritage protections, public access, open space, and pedestrian permeability. Zoning of property to the north Notes that the zoning of 534 Church Street to the north is residential. Should be rezoned to C2Z. Interim planning controls Do not support the proposed use of interim controls used but rather a standard planning scheme amendment. 	
33 Commercial landowner Birrarung Precinct	 Rosella Strategic Site Support the identification of the site as part of a strategic site, and request that this be maintained in the final iteration of the UDF. Development of the site has potential to deliver considerable community benefit. Notes buildings of 4 to 8-storeys have been approved/commenced constructed in Balmain, Gordon and Newton Streets. Fragmented titles on the site and is relatively unconstrained, an overarching masterplan would assist. Opportunity to accommodate a true mix of uses. 	Rosella Strategic Site • See Strategic Sites – Rosella Strategic Site.
34 Commercial landowner Church Street Precinct	 Building heights Comments that nearby built-form is up to 11 storey in scale. Supportive of discretionary maximum building height controls. Mandatory 10- storey would flatten development and prevent narrow extensions above 10 storey. Current envelope of 10-storey maximum building height is not deep enough. This restricts design outcomes and discourages larger organisations from occupying the developments. Steps down in height to the west too quickly. Maximum building height should be reviewed in line with recent approvals e.g., the 11-storey development at 510 Church Street Extend the envelope of the 10-storey maximum building height. Floor to floor heights vary pending the use. High-profile commercial tenants benefit from higher ceilings compared to other uses. Lower floor heights reduce amenity for commercial occupants which may limit the ability to secure valuable commercial tenants. Maximum building heights should be measured in storeys not metres. Residential amenity The residential interface standards will excessively restrict development of commercial sites. Notes that VCAT has consistently determined that residential properties adjacent to commercial areas cannot expect the same level of amenity. Comments that the interface requirements are stronger than B17 standard. 	 See Theme 5 – Building heights; and Measurement of building heights. Residential amenity See Theme 5 - Amenity impacts – Residential precincts and – Residential properties within the Commercial 2 Zone. Overshadowing – public realm See Theme 5 - Impacts on the public realm and Mandatory vs discretionary built form controls Public notice of planning applications The Commercial 2 Zone includes a provision that exempts planning applications from third party notice and appeal rights, except where the site is within 30 metres of a residential zone, education centre or hospital. It is proposed to include the same exemption in the proposed DDOs to ensure consistency between the zone and overlay and reflects the precinct's status as an enterprise precinct.

Sub No & Interest	Summary	Response
	 Setback expectations for developments adjacent to a residential zone should be less than B17 not greater. Overshadowing – public realm Spring equinox mandatory restrictions on Church Street 10 am-2pm prevents design innovation and don't consider existing built-form. Mandatory controls prevent decisions being taken on design merit. Footpath shadow control should be revised to: Commence/ conclude at 10:30am/1:30pm on spring equinox, in recognition of existing shadows (and resulting in building heights) and to better align with the lunchtime period of the day; and To be discretionary, rather than mandatory to allow for sunlight access to be considered contextually. Public notice of planning applications Planning applications that meet discretionary standards should not have provide public notice – allows projects to be delivered more efficiently in line with the structure plan. 	
Commercial landowner Cremorne West Precinct	 Building heights Large commercial development site with closest residential zone 50m away. Seeking a development of up to 9-storey in height. Supportive of discretionary maximum building heights as allows for design innovation. Concerns that recent approvals dilute the merit of differentiating the preferred building heights. Notes 8-storey at 65-81 Dover Street and 9-storey at 49-55 Dover Street. Suggestions: Review maximum building height in line with recent approvals. 9-storey preferred building heights should be applied across the Cremorne West Precinct, except where there is an immediately adjacent residential zone. Maximum building height should be measured in storeys not metres. This is due to higher floor to floor height for commercial / office developments. Floor to floor heights can exceed 3.8metres. Public notice of planning applications New design and development overlays should exempt public notice where discretionary standards are met to allow projects to be delivered promptly in line with the UDF. Notice places an undue emphasis on residential amenity in a commercial zone. 	 Building heights See Theme 5 – Building heights. Public notice of planning applications See response to #34.
36 Commercial landowner	 Potential strategic site UDF provides little strategic direction and built-for controls for the site, however shares similar attributes to other areas located as strategic sites in the UDF. Broadly supports the UDF. 	The draft UDF identifies seven strategic sites which are large and complex sites that present development opportunities. These sites present opportunities to realise community benefits including through

Sub No & Interest	Summary	Response
Birrarung Precinct	 Site is treated like it is already developed however, the context of the UDF provides new opportunity to revisit the site. Greater consideration of the future development of this site. Should considered its own strategic site. Rezoning Rezoning of the site could be considered to provide more flexibility of land use – no zone suggested. 	 site links, new walking and cycling connections and opportunities for much needed open space. The draft UDF flags that further work will be undertaken with landowners to inform more detailed master planning of the sites. This would further explore built form parameters and consider planning scheme mechanisms. This site is not proposed to be included as a strategic site. The Punt Road site contains a prominent building which was constructed in 2009. However, planning controls which reflect the current development have been included in the UDF and draft DDO to address a gap. Rezoning No details provided.
37 Commercial landowner Cremorne West Precinct	 Site is at a 'gateway location'. Generally supportive of the overall vision of the UDF. Building heights, street wall and upper level setbacks Proposed controls of 8-storey with a 4-storey street wall and 5 metre upper level setbacks will restrict the site from reaching full development potential. Notes other setbacks are required. Site is large with limited constraints and has potential for higher density commercial development. Notes recent approvals in the order of 10-storeys. Allow higher maximum building heights on larger strategic sites such as this. Mandatory vs discretionary controls Remove mandatory controls. Street network and hotspots Affected by the Cremorne / Kelso Street Hotspot proposal (Hotspot 1). Support the intent to improve the efficiency of the local network and improve connections to public transport. Strongly object to the proposed road changes in the vicinity because: – Uncertainty will impact on development confidence and stall projects – Insufficient background traffic analysis – No consultation with landowners most affected Open space opportunity area Site is included within an area of open space opportunity – site is a prime candidate for commercial development. Remove the site from open space opportunity area. 	 Building heights, street wall and upper level setbacks See Theme 5 – Building heights. Mandatory vs discretionary controls See Theme 5 - Mandatory vs discretionary built form controls. Street network and hotspots See Theme 3 - Traffic and street network and Hotspots. Open space opportunity areas See Theme 4 - Specific locations for new open space / public spaces.
38	Street network and hotspots	Street network and hotspots

Sub No & Interest	Summary	Response
Residents Cremorne	 Generally supportive of framework overall and implementation, in particular pedestrian improvements and widening footpaths. Strong concern with the proposed changes to Cremorne Street (Figure 20 and Figure 21): Cremorne Street is only access in and out of Cremorne to the north in Richmond Will cause additional traffic congestion to local streets within Cremorne Concerns that Figure 21 will not work given it limited access out of Cremorne – except south onto Punt Road or CityLink Penalises residents. Suggests working with VicRoads to improve signalisation of the intersection of Punt Road and Swan Street to east and west-bound traffic (currently significant traffic congestion issues, which encourages rat-running). Supportive of signalisation of Punt and Kelso Street intersection. Further suggests implementing a northbound right-hand turn from Kelso Street to reduce pressure to the Cremorne/Swan St intersection for vehicles travelling north. Further suggests a signalised intersection/crossing at Punt Road to Gosch's Paddock. 	See Theme 3 - Traffic and street network and Hotspots.
39 Commercial landowner Cremorne West and Church Street Precincts	 Have invested in the upgrade of their two sites including enhancements to public realm. Generally supportive of the UDF's purpose and six of the ten key moves. Grow Cremorne's commercial core as a global tech and enterprise precinct Cremorne Street and Church Street as the key spines of the enterprise precinct Celebrating the unique history of Cremorne's industrial and residential past Enhanced links to revitalised Richmond and East Richmond Stations An exemplary environmentally sustainable precinct Reconnecting Cremorne to the river corridor. Building heights Supports discretionary maximum building height controls. Street setbacks Supports ground level setbacks to enhance the public realm, accommodate entrances and spaces for outdoor dining, bike parking and landscaping. Supports greater setbacks on sites with wider frontages. Overshadowing – public realm Lack of justification for mandatory solar access and setback controls. Remove any mandatory minimum setback requirements. Setbacks should be assessed on a case by case basis Solar access controls should be discretionary. Interim planning controls Interim controls are unwarranted. Street network and hotspots 	 Building heights See Theme 5 – Building heights. Street setbacks See Theme 5 - Street and ground floor setbacks Overshadowing – public realm See Theme 5 - Impacts on the public realm and Mandatory vs discretionary built form controls Interim planning controls See Theme 5 – Interim planning controls and transitional provisions. Street network and hotspots See Theme 3 - Traffic and street network and Hotspots.

Sub No & Interest	Summary	Response
	 Fails to consider servicing requirements for mix of uses. UDF aims to be pedestrian orientated however the businesses have special needs in regards to servicing, loading and delivery. Needs greater regard for servicing businesses. Proposed directional changes to Cremorne Street will cause further congestion. Prevents traffic from leaving the area. Encourages drivers to take illegal routes. Maintain two-way vehicle movements along Cremorne Street. Cremorne Street to have lower speed and shared streets with cyclists and landscaping. 	
40 Heritage Victoria	 Historical archaeological assessment Area has the potential to contain historical archaeological sites that relate to the many phases of activity. UDF should include undertaking a Historical Archaeology Assessment to identify sites that may be eligible for listing on the Victorian Heritage Inventory. Strategic sites - General Objects to the classification of the above VHR places as 'development opportunities' in the draft UDF (page 105). Generally unsupportive of intensive development including towers at VHR places -seeing an increase in inappropriate scale and massing. A limited level of new development could be considered VHR places to assist in facilitating the ongoing protection and conservation of the place, but these places should not be considered as opportunities for development. Master planning Open to the suggestion for further strategic work via a more detailed master planning process. The UDF should more strongly articulate an appropriate scale of new development to establish an agreed starting point for any master plan. Land or airspace within the extent of registration should not automatically be considered as developable. Some places may only be able to sustain limited new development, while others may not be able to sustain any at all. Any height control such as a DDO or Floor Area Ratio (FAR) tool is not appropriate for places in the VHR. The inclusion of the place in the VHR plays a much greater role in determining any potential development on the site. If it is necessary to implement height controls, HV's preference is that development on VHR places is limited to the height of the heritage buildings at the place (generally parapet rather than roof height). Transition in heights of surrounding buildings The focus on Cremorne as an Enterprise Precinct will result in a substantial change to the urban character and scale of built form in Cremorne, with su	 Historical archaeological assessment See Theme 5 - Historical archaeological assessments. Strategic sites – General See Strategic Sites – General. Former Bryant & May Strategic Site See Strategic Sites – Bryant and May Strategic Site. 534 Church Street Strategic Site See Strategic Sites – 534 Church Street Strategic Site. Bendigo Kangan Institute Strategic Site See Strategic Sites – Bendigo Kangan Strategic Site. 658 Church Street Strategic site See Strategic Sites – 658 Church Street Strategic Site. Richmond Maltings Strategic site See Strategic Sites – Richmond Maltings Strategic Site.

Sub No & Interest	Summary	Response
	 The impact of new building located behind heritage buildings should also be considered. Potential heights of up to 10 storeys (40m) adjacent VHR places is not considered an appropriate response. Update the draft UDF to address transitional development, particularly as a precursor for the development of DDOs for these sites. Further analysis diagrams, 3D modelling or other visual tools should be used. Must not allow for cantilevering over the heritage place - provide breathing space for the heritage place. Increased height controls should not result on additional overshadowing of VHR places. The draft Cremorne UDF does not adequately address Trethowan's recommendation - the creation of transitional infill built form between the 'new and the old'. 	
	Viewlines	
	 View lines to heritage places and features should also be considered. Architectural details such as roofs and landmark features such as historic signage and chimney stacks must protected in views from surrounding streetscapes. 	
	Church Street Precinct, including Former Bryant & May (H626), 560 Church Street, Cremorne (Bryant and May Strategic Site)	
	Transition in heights of surrounding buildings	
	 The potential for 8-10 storeys (32-40m) on sites neighbouring Former Bryant & May is of concern. Would significantly diminish that landmark status and architectural prominence. More analysis should be undertaken. The Former Bryant & May site, particularly the main factory building maintains architectural prominence on Church Street. The chimney stack and clock tower to the north-west corner of the place are significant local landmarks. Massing and height to the north-west corner of both the Former Bryant & May site and 534 Church Street Strategic Site will be particularly important if views to these features are to be retained in Chestnut Street to any extent. UDF does not provide an appropriate transitional zone around Former Bryant & May nor protection of significant landmark features of the site. Further analysis is required. The scale of any new built form at 534 Church Street Strategic Site must have regard for the state heritage significance of Former Bryant & May. Built form should be low scale, forming part of that transitional zone. Design objectives should reference protecting the prominence of the Former Bryant & May site as a whole, not just to the clocktower and chimney features from Chestnut Street. Consider setbacks, including at ground level, on Church Street to retain prominence for the factory building when looking south on Church Street toward Former Bryant & May. 	

 Any height on this site should be analysed to ensure that the roof of the factory building of Bryant & May retains its engagement with the sky. Bryant and May Strategic Site Retaining prominence of the heritage buildings, features and signage Design objectives relating the retaining prominence of the heritage features is supported. However, should be updated to refer to 'heritage buildings and features'. The reference to 'features' suggests only architectural features should be considered rather than the buildings as three-dimensional elements. Any new built form should present as a well-designed companion building(s) which defers to the heritage place. Reference to the historic signage on the buildings must also be added as an element to remain prominent. East-west link Design objective 2 is supported, particularly the east west link between the north and south sides of the place. Built form The vision to maintain the prominence of the state significant industrial complex is supported, as with the intent of high quality contemporary built form. It is unclear what is meant by the statement 'create a visually interesting skyline and streetscape surrounding the complex'. There is concern that this preferences buildings of height and highly contemporary design on the site that would compete with the heritage buildings, and their unique skyline engagement. Highly contemporary design such as those that create 'visually interesting skylines' which is starkly different to the heritage elements should be discouraged. While the strip of land facing Chestrust Street is not included in the extent of registration in the
VHR, it is still addressed in these comments. Northern half of the site (land to the north of the access street) Notes that while the strip of land facing Chestnut Street is not included in the VHR, the following comments have been provided. Built form On the northern half, demolition of the non-registered 1980s buildings on site would provide a positive benefit to the place, particularly in recovering Brymay Hall, the Dining Hall and the Administration Buildings as free standing buildings. Removing the later built form from these heritage buildings, and reconstructing lost elements would be positive. It is acknowledged that the northern half of the place may require updated activation to secure

Sub No & Interest	Summary	Response
	 New built form (north portion of site) like the height of the existing, or to a maximum height of approximately the parapet of the main factory building could be considered, however not to the full extent of the land. 	
	Non-registered land – north-east corner	
	 There is not adequate detail in the draft Cremorne UDF to understand what a design objective, including anticipated height, is for the non-registered land to the north-west corner. Development on this portion of land (north west corner) at any scale above single storeys is likely to significantly impact any views toward the chimney stack and clock tower from Chestnut Street. 	
	 Include Objective 5 from the 534 Church Street Strategic Site in the design objectives for Bryant and May Strategic Site. This reads: 'Building massing will ensure that the Bryant & May clocktower and chimney remain prominent when viewed from Chestnut Street'. Any built form on that corner must also be broken up so that permeability through to Former Bryant & May is achieved. 	
	Southern half of the site (land to the south of the access street)	
	 The south half contains the factory building, tennis pavilion, tennis courts and a commercial development on the corner of Church and Balmain Street. Notes that while the strip of land facing Chestnut Street is not included in the VHR, the following comments have been provided. 	
	Open space	
	 The provision of open space on the non-registered land on the west boundary is supported, particularly as this protects a significant view line from Chestnut Street where the main factory building, clock tower, chimney stack and historic signage are prominent. Retaining no built form on this piece of land would ensure the three dimensionality of the heritage buildings is retained, along with the ability to comprehend the spatial scale of the complex. 	
	Built form	
	 Considers there is limited capacity for additional built form on the southern half of the site. Strong preference is for no new built form on the land to the west of the pavilion, as this open space is equally as important as that further to the west. Unlikely to support any new built form there that was larger than the existing contemporary building. Supports reinstatement of the historic fence at this location based on evidence. 	
	Cremorne West Precinct, including Primary School No. 2084 (H1634), 55-67 Cremorne Street (Bendigo Kangan Institute Strategic Site)	
	Extent of registration	
	Primary School No. 2084 is an early registration in the VHR and does not include land.	

Sub No & Interest	Summary	Response
	 Review underway to ensure that the extent is clear and includes land (current practice under the Heritage Act 2017). 	
	Transition in heights of surrounding buildings	
	 The potential for 7-8 storeys (28-32m) on sites neighbouring Primary School No. 2084 is of concern, and more analysis should be undertaken to ensure the historic urban context for the school would not be diminished by being surrounded by that height. The Seek Building at 60-88 Cremorne Street, directly opposite the school, demonstrates the impact such scale and massing could have on this VHR place. The Seek Building, with maximum height of 8-9 storeys, and with a highly contemporary design form, dominates the skyline in long views of this area. If a similar scale was anticipated to surround the Bendigo Kangan Institute Strategic Site, this would have profound impacts particularly on its setting. This is not only a matter for consideration in the Bendigo Kangan Institute Strategic Site as is currently the case (in point 1 in the Design objectives), but for the immediate surrounds of the school in the Cremorne West Precinct. 	
	 Analysis to ensure this is adequately protected must be undertaken before suggesting such heights in the planning scheme via the Cremorne UDF, or in any DDO. 	
	Bendigo Kangan Institute Strategic Site	
	Adaptive reuse	
	 The adaptive reuse of the place by the Bendigo Kangan Institute is considered compatible with the historic use for educational purposes. 	
	Building heights	
	 Design objective 1 - encourages buildings with a range of height. Height must be more clearly defined. 	
	 Strongly encourages a maximum height of no higher than the heritage buildings (parapet height) is added. 	
	 The objective should be to retain the prominence of the historic school buildings within the site. 	
	 Two-three storeys above the height of the heritage buildings could be considered on the northern end of the Strategic site, forming a transitional zone between the broader Cremorne West Precinct and the sensitive heritage site, providing testing shows this does not impact the roof and skyline views. 	
	Open space	
	 The proposed creation of open space to the south of the school buildings and extending between Cremorne and Dover Street is strongly supported as this would provide a sympathetic setting for the buildings. Any expansion of this link would be supported. Would assist in the transition between historic and new development at the site and assist with maintenance access for the heritage buildings. 	
	Removal of contemporary connections	

Sub No & Interest	Summary	Response
	 Removal of the contemporary connections to the heritage building with the intent to recover the school buildings as free-standing buildings is strongly encouraged to be added as a design objective. Setbacks 	
	 Strongly encouraged to increase the 6m minimum ground floor setback from Cremorne Street to 10m. A minimum set back to Dover Street should also be considered, avoiding built form to the footpath edge (as is currently the case), which detracts from the prominence of the school building (which also goes to the footpath edge) in the streetscape. 	
	Former Richmond Power Station (H1065), 658 Church Street Strategic site	
	Building heights	
	Design objective 1 - the height must be more clearly defined.	
	 The Former Richmond Power Station building must be retained as the tallest building on the west side of this site. Any buildings with substantial height above the existing height of the Former Richmond Power Station buildings should be located to the east ensuring the low rise setting for the historic buildings is maintained. A transitional zone between any built form of height and the heritage building is essential. Emphasis should be on recovering greater prominence for the Former Richmond Power Station as a free-standing landmark building, as it is currently difficult to discern from the neighbouring office developments. 	
	 Design bjective 4 – add reference to retaining and recovering a greater prominence for the building from Electric Street, Hargreaves Street and Oddys Lane, in addition to Dale and Green Streets. New - Important to maintain visual connections between the west decorative façade of the 	
	Former Richmond Power Station and the railway line, as this demonstrates the historic use and architectural significance of the place.	
	Adaptive reuse	
	 In any new adaptive reuse or changes to the Former Richmond Power Station building, Heritage Victoria would be seeking to reinstate historic materials and presentation of the place as a key conservation action. This includes but is not limited to reinstating corrugated sheeting to part of the Hargreaves Street façade and addressing significant graffiti and inappropriate painting of the west brick façade. 	
	Richmond Maltings (H2050), 15 Gough Street, Richmond and Nylex Sign (H2049), 2 Gough Street, Cremorne	
	 No further comment is provided on this site in the context of the existing planning and heritage permits in place. 	