



**Amendment C223 to the Yarra Planning Scheme
Planning Evidence Statement – 11 May 2020**

Prepared for:

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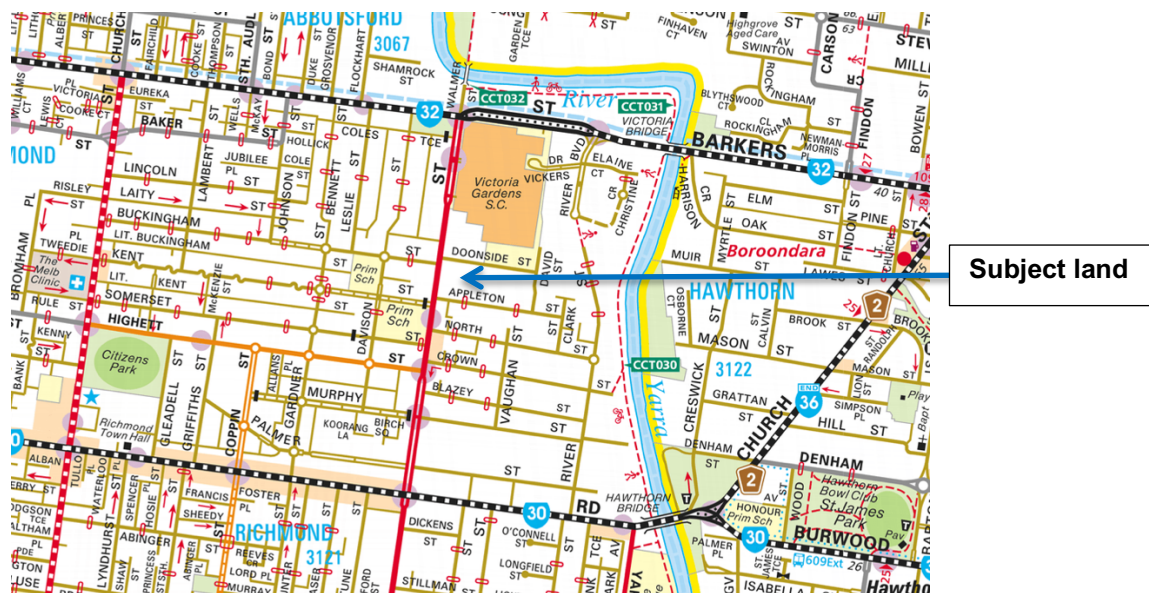
01 Introduction

1. I have been requested by Planning Property Partners on behalf of the proponent (Astrodome Hire Pty Ltd) to prepare a statement of evidence that considers Amendment C223 (the Amendment) to the Yarra Planning Scheme and the implications of the Amendment from a statutory planning perspective.
2. This Amendment relates to land at 81-95 Burnley Street and 26-34 Doonside Street, Richmond and seeks to rezone the land from Industrial 3 Zone to a Mixed Use Zone together with the application of a Development Plan Overlay (schedule 15) and Environmental Audit Overlay.
3. I was not involved in the preparation of any part of the Amendment or any strategic documentation that has informed the current version of the proposed controls.
4. In preparing this statement I have undertaken the following:
 - Reviewed the exhibited documentation as part of the Amendment including background reports that have been prepared by the proponent and the City of Yarra;
 - Reviewed all relevant planning controls and policies contained within the Yarra Planning Scheme, including *Plan Melbourne 2017-2050*;
 - Reviewed a number of strategic planning reports prepared by the City of Yarra together with development approvals relating to several surrounding properties;
 - Reviewed the written submissions that were lodged during the exhibition period;
 - Reviewed the Council reports relevant to the Amendment;
 - Reviewed relevant Practice Notes and Ministerial Directions that relate the proposed rezoning; and
 - Reviewed reference documents to the Yarra Planning Scheme that are relevant to this Amendment.
5. I have been instructed that matters relating to car parking, access and traffic generation are being addressed in evidence by Ms Hilary Marshall of Ratio Consultants, and heritage issues are to be addressed by Mr Bryce Raworth and Mr Peter Lovell. The overall approach to the project from an urban design perspective will be addressed by Ms Catherine Hegggen of Ratio Consultants and strategic planning issues examined by Mr Michael Barlow of Urbis. I have therefore been instructed to focus my assessment on the application of the proposed planning controls and expected process of approvals under them.

6. In preparing this statement I have been provided with the final expert evidence statement of Ms Catherine Heggen of Ratio Consultants and make reference to the conclusions of this statement in my evidence.
7. The following statement provides a summary of my assessment and opinions in relation to the proposed zone and overlay controls. Specifically, my evidence focuses on the following key matters:
 - The current strategic framework that guides the development throughout the Richmond precinct and the pattern of development that has occurred in recent times within the immediate area;
 - The strategic importance of the land in the context of the surrounding precinct and the scope for delivering a valuable contribution to the supply of commercial and residential land;
 - The application of the proposed zone and overlay controls and how this integrates with the land use patterns of the surrounding precinct; and
 - Any recommendations regarding further refinements to the proposed overlay controls.
8. For the purposes of this report included in Appendix **A** is a summary of my experience and other relevant particulars.

2.0 Subject land and Surrounding Context

9. The land which is the subject of Amendment C223 is located on the eastern side of Burnley Street, Richmond and is positioned approximately half way between the major intersections of Victoria Street to the north and Bridge Road to the south.
10. Three roads abut the land including Burnley Street to the west, Doonside Street to the north and Appleton Street to the south. Along the eastern boundary of the site is a recently completed residential development at 39 Appleton Street (Embassy).



11. Formally known as 81-95 Burnley Street and 26-34 Doonside Street, Richmond the land is an irregular shaped consolidated parcel, currently made up of two titles known as:
 - Lot 1 on PS 743081D (Volume 12006, Folio 301).
 - Lot 2 on PS 743081D (Volume 12006, Folio 302).
12. The land has a total area of 12,830 square metres and is relatively flat. No easements or restrictions are registered on title.



13. The western portion of the site accommodates a number of large brick warehouse buildings that have been positioned on the site since the early 1940s and are used for showrooms and ancillary offices associated with the Harry the Hirer business. All vehicle access to the site is provided directly off Doonside Street with the main pedestrian (customer) entry being located on the corner of Burnley Street and Doonside Street.
14. The eastern portion of the site accommodates less built form but includes large areas of at grade parking and smaller buildings used for storage and parking. A double storey brick building known as 26 Doonside Street, constructed in the late 1930s, is the only structure of heritage value across the eastern portion of the site.
15. The southern boundary of the site has a continuous solid wall fronting onto Appleton Street with only service entries for pedestrians and no clear window openings.
16. Due to the developed nature and land use activity that has occurred for many decades, there is no significant vegetation except for one large gum tree located adjacent to the Doonside frontage (proposed for retention).
17. Currently the site is covered by two Heritage Overlays which seek to protect the main warehouse building fronting Burnley Street and the smaller brick building located on Doonside Street in the eastern portion of the site.



18. The land use and built form character of the precinct immediately surrounding the subject site is highly varied, including a mix of both low scale heritage dwellings, recent high density housing, small industrial businesses, major retail and commercial activity and education facilities (primary school). This mix of uses is to a significant degree a product of the gradual development of the area over many decades and, in particular, the change that has occurred in more recent years from the once industrial focus that characterised the eastern end of Richmond. The following summary considers each direct interface and the broader area:

To the North

Along the northern boundary of the land is Doonside Street, a two way local road that extends between Burnley Street and David Street. Land on the northern side of Doonside Street includes the rear entry to the Victoria Gardens Shopping Centre used mainly for loading purposes and various one and two storey commercial buildings.



To the South

Along the southern boundary is Appleton Street. This is a two way road that provides local access between Burnley Street and Clarke Street. The character of this street is highly mixed with single and double storey dwellings along the southern side of the road for approximately half its length, industrial and commercial activity at the eastern end of the street and high density housing constructed in the last few years on the northern side adjacent to the subject land. Street trees extend along the northern side of the street with parallel parking provided.



To the East

The development to the eastern boundary of the site is known as the Embassy Apartments (39 Appleton Street). Constructed recently this development has a number of building forms including two storey offices along the Appleton Street frontage and apartment buildings ranging from seven to thirteen storeys. A through lane (privately owned but publicly accessible) extends through the middle of the site connecting Appleton Street and Doonside Street.



To the West

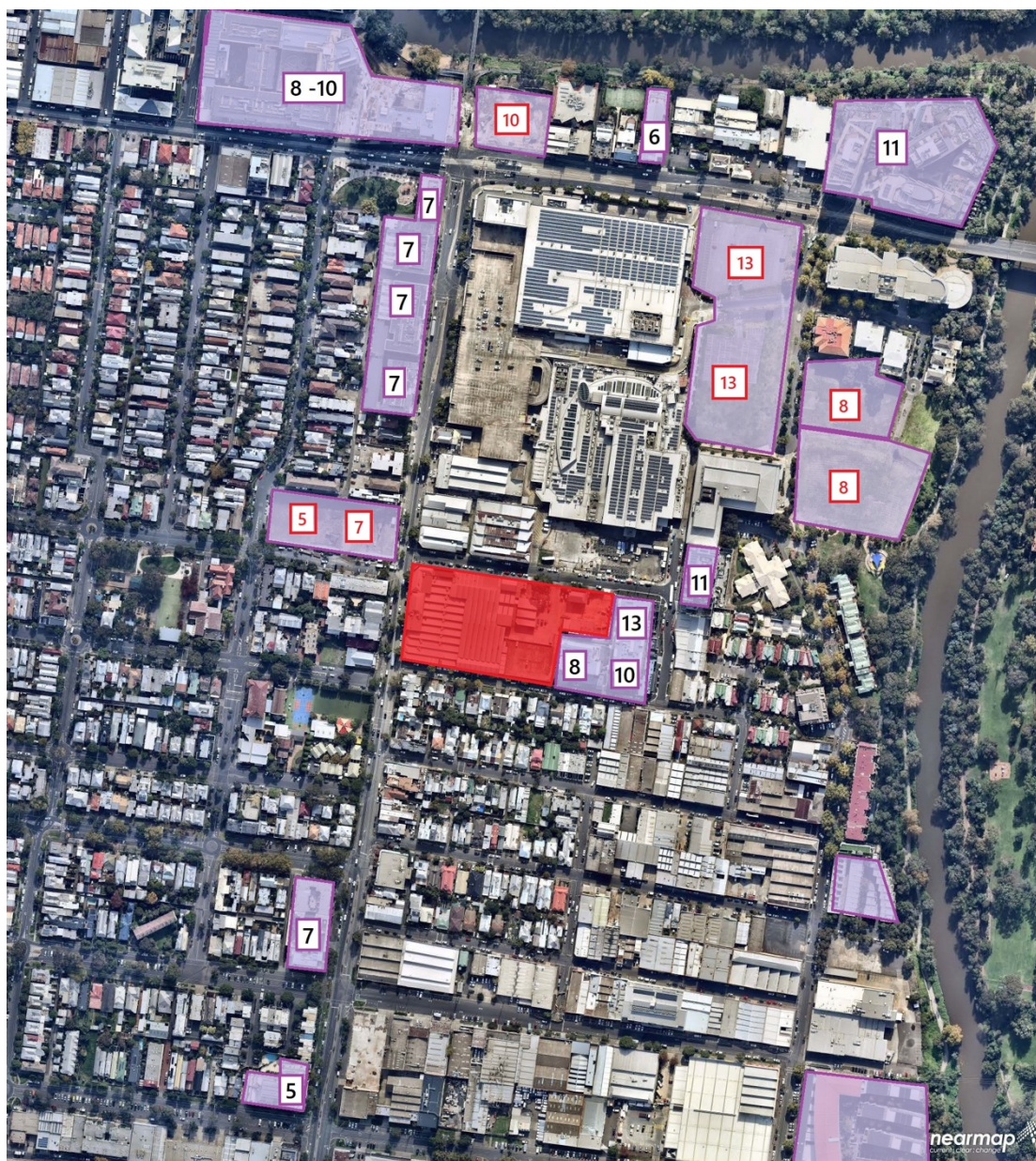
Along the western boundary of the land is Burnley Street. This is a major north / south road that extends from Victoria Street through to the M1 Freeway, carrying two lanes of traffic in each direction. Development along Burnley Street is highly mixed and includes the Victoria Gardens Shopping Centre to the north, medium density and higher density housing developments, a primary school, single detached dwellings and a variety of retail, commercial and industrial activity.



19. The broader context within which the site is located has undergone significant transformation over the last decade, including development extending along Burnley Street as well as several of the side streets that run off Burnley Street. For some projects this has been as a result of rezoned land and for other sites it has been a long term vision developed over stages in line with strategic policy.
20. The result has seen the eastern edge of Richmond change significantly in terms of the built form character, the demographics of the population living and working within the precinct and the land use patterns. A once industrial part of Richmond is now a mix of retail activity that is of regional significance, high density housing,

small and medium sized business activity representing a variety of industries and several food related premises. In short, a truly mixed use area that reflects its inner urban context.

21. The following plan provides a graphic representation of the key developments (or approved developments) that make up this immediate context with the storeys of each building identified. This plan represents the extent of built form change that has received planning approval or been constructed within the precinct.



Development Completed



Development under construction or approved

03 The Amendment

22. The Amendment has been prepared by the City of Yarra at the request of the proponent and proposes to make the following changes to the Yarra Planning Scheme (YPS) affecting the land:

- Rezone the land from the Industrial 3 Zone to the Mixed Use Zone;
- Apply the Environmental Audit Overlay across the land;
- Apply the Development Plan Overlay Schedule 15 (DPO15) across the land.

23. The combination of the proposed zone and overlay provisions is intended to facilitate development in the future which will include:

- Medium and high density housing, 10 per cent of which will be affordable housing;
- Retention of heritage built form and adaptive reuse;
- Commercial and retail floor space which will include the Harry the Hirer headquarters together with potential for other commercial activity;
- Public open space and through block pedestrian linkages; and
- Road and public realm upgrades where necessary.

24. I note that there are no changes proposed to the Municipal Strategic Statement (MSS) or any other policies contained in the YPS to facilitate the Amendment.

25. The Amendment was exhibited from 19 September to 24 October 2019. A total of 53 submissions were received during the exhibition period which included:

- One submission in support of the Amendment (prepared by the representatives of the proponent);
- One submission that did not formally object or support the Amendment but raised matters to do with another land holding;
- Two submissions from nearby residents that detailed conditional support for the Amendment;
- One submission from Melbourne Water raising no objection to the Amendment; and
- Forty eight submissions from surrounding residents objecting to the

Amendment.

26. The outcomes of the exhibition period were reported at the meeting of Council on 3 March 2020. In response to the submissions the officer of Council recommended the following modifications be made to DPO15:
- insert provisions protecting west side of Burnley Street from overshadowing. This includes a requirement that the footpath to the west side of Burnley Street is to be free of overshadowing between the hours of 11am and 2pm at the equinox (as a result of the proposed development of the site);
 - include wording in the Development Plan Vision by adding '*and adjoining residential properties to the east*' to the third dot point: *To protect the amenity of residential properties on the south side of Appleton Street*;
 - include a 9 metre building separation between new development and the Embassy Apartments directly to the east and south;
 - insert provisions and amend DPO15 to reflect the intention to retain the heritage building at 26 Doonside Street;
 - insert provisions to clarify the expectations for a varied skyline and high quality building materials and design; and
 - insert provisions to clarify the treatment of loading areas and services.
27. A modified form of the proposed DPO15 was provided as part of the officer report to Council.
28. The Council adopted a position of support for the Amendment in accordance with the officer's report including the refinements to the wording of DPO15 that were outlined. The minutes of this Council meeting confirm that in addition to the officer recommendation the City of Yarra will adopt an advocacy position to increase the provision of open space proposed in the exhibited DPO 15. Although there was no further information available as to what extent of additional open space Council may be seeking, it is assumed for the purposes of this evidence statement that it relates to publicly accessible open space across the land and not areas of private open space that may be provided to individual residential dwellings.

04 The Existing Planning Framework

29. The following summarises the relevant provisions of the YPS which I have considered in the preparation of this evidence statement, and which provide guidance on both macro and micro planning issues, and the long-term vision for the growth and development of the Richmond area within which the land is located.

3.1 Planning Policy Framework

30. The Planning Policy Framework (PPF) seeks to develop the objectives for planning in Victoria (as set out in the *Planning and Environment Act 1987*) to foster appropriate land use and development planning policies and practices that encompass relevant environmental, social and economic factors.

31. Of particular relevance to the Amendment are the following Clauses which provide guidance to the future development and land use planning anticipated that will occur within the municipality:

- Clause 11 (Settlement) – This Clause is focused on recognising the needs of Victorians and identifying how planning should appropriately respond to these needs through the provision of zoned and serviced land that provides for a range of land use activities in order to create a healthy and sustainable community.
- Clause 13.04-1S (Contaminated and potentially contaminated land) – This clause is focused on facilitating the necessary remediation of contaminated land to ensure any adverse effects on future land uses are appropriately addressed.
- Clause 15 (Built Environment and Heritage) – This Clause seeks to ensure that all new land use and development appropriately responds to its landscape, valued built form and cultural context, and protect places and sites with significant heritage, architectural, aesthetic, scientific and cultural value. Clause 15.01-4 promotes the creation of health and activity neighbourhoods and Clause 15.03 provides specific policy guidance relating to the conservation of places of heritage significance.
- Clause 16 (Housing) – The scope of this clause addresses housing affordability, diversity and locating appropriate densities of new housing to meet the needs of the local community and expected future population.
- Clause 17 (Economic Development) – This Clause seeks to foster and support economic growth and development and recognises tourism as an

important sector of the economy. In this regard Clause 17.03 promotes metropolitan Melbourne as a desirable tourist destination. The preservation of places of cultural heritage is seen to form part of the attraction of Melbourne and the Capital City plays a key role in this respect.

- Clause 19 (Infrastructure) – The broad range of this Clause covers the development of social and physical infrastructure in a way that is efficient, equitable, accessible and timely. The scope of this clause recognises social needs of the community and promotes a range of accessible community resources, such as education, cultural, health and community support (mental health, aged care, disability, youth and family services) facilities to meet growing communities.

32. As can be expected with an Amendment of this scope, a number of the policy objectives contained within the above clauses provide broad strategic guidance relevant for development across both growth areas and urbanised land, whereas other clauses are of direct relevance to the more detailed consideration of infill development.

33. *Plan Melbourne (2017-2050)* is of particular relevance to the Amendment. Outcome 1 of this Plan is focused on Melbourne remaining a productive city that attracts investment, supports innovation and creates jobs. The four Directions that provide the policy structure under Outcome 1 seek to address the spatial and land use requirements for future employment growth, including national employment clusters, health and education precincts, state significant transport gateways, state significant industrial precincts and metropolitan activity centres. I note that the affected land is not within any of the identified places of State significance however it is located within a major activity centre.

34. Outcome 2 seeks to provide housing choice for the community in locations close to jobs and services. On the basis that we anticipate Melbourne will need 1.6 million new homes during the life of the Plan (35 years), there is a clear need to carefully consider the types of new housing required to meet different households and lifestyles. The directions under this Outcome includes a focus on delivering more housing closer to jobs and transport.

35. It is important to highlight that Outcomes 3, 4, 5 and 6 also have relevance to the Amendment and future planning of this community. In response to these policies the overall approach must respond by:

- integrating a sustainable transport system for all new residents and visitors;
- creating neighbourhoods that vary in density and land uses and are

focused on the concept of 'living locally'. This approach seeks to create a series of '20 minute neighbourhoods' and is based on giving people the ability to meet most of their everyday needs within a 20 minute walk, cycle or local public transport trip from their home.

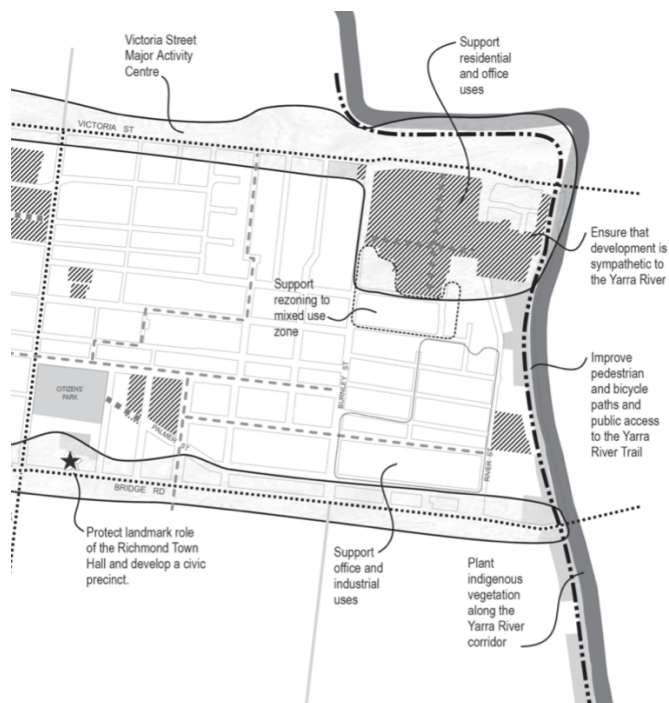
- ensuring the design of any new housing is of high quality and amenity for future residents;
- promoting a healthy, safe and vibrant network of neighbourhoods that are interconnected, promotes walking and cycling and ensure the community have access to a broad range of services and facilities; and
- integrating a range of design initiatives that promote water and energy efficiency for a more sustainable community where natural habitats are protected and the community builds resilience to climate change.

3.2 Local Planning Policy Framework

36. The Local Planning Policy Framework (LPPF) for Yarra includes both the Municipal Strategic Statement (MSS) and local policies. The following clauses of the MSS are considered to be the most relevant to this Amendment:

- 21.02 – Municipal Profile
- 21.03 – Vision
- 21.04-1 – Accommodation and Housing
- 21.04-2 – Activity Centres
- 21.04-3 – Industry, Office and Commercial
- 21.04-5 – Parks, Gardens and Public Open space
- 21.05-1 – Heritage
- 21.05-2 – Urban Design
- 21.05-3 – Build form Character
- 21.06 –1 – Walking and cycling
- 21.06 – 4 – Public Transport
- 21.06 --3 The Road System and Parking
- 21.08 Neighbourhoods. It is noted that the land is positioned within the North Richmond precinct and is within the boundary of the Victoria Street

Major Activity Centre. The neighbourhood character map for the Victoria Street East sub precinct identifies the land as being suitable for rezoning to mixed use.



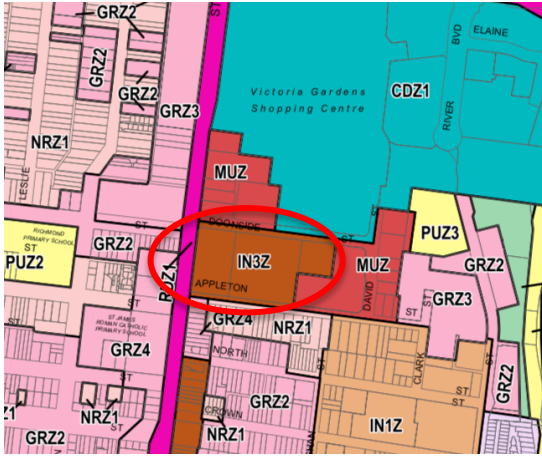
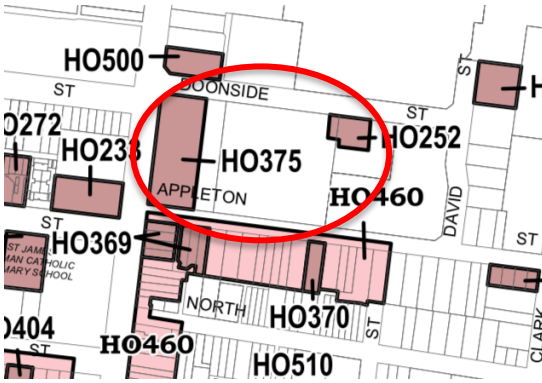
37. The key local policies contained at Clause 22 of the YPS that are relevant for the future use and development of the land include:

- Clause 22.02 – Development Guidelines for Sites subject to the Heritage Overlay
- Clause 22.05 – Interface Uses Policy
- Clause 22.10 – Built form and Design Policy
- Clause 22.11 - Victoria East Precinct Policy
- Clause 22.12 - Public Open Space Contributions Policy
- Clause 22.16 – Stormwater Management (WSUD)
- Clause 22.17 - Environmentally Sustainable Development

38. I have taken these provisions of the LPPF into account in the preparation of this evidence statement however it is noted that there are no modifications proposed as a result of the Amendment.

3.3 Zone and Overlays

39. The following provides a summary of the purpose of the current zone and overlay controls affecting the land:

Industrial 3 Zone	
<p><i>To implement the Municipal Planning Strategy and the Planning Policy Framework.</i></p> <p><i>To provide for industries and associated uses in specific areas where special consideration of the nature and impacts of industrial uses is required or to avoid inter-industry conflict.</i></p> <p><i>To provide a buffer between the Industrial 1 Zone or Industrial 2 Zone and local communities, which allows for industries and associated uses compatible with the nearby community.</i></p> <p><i>To allow limited retail opportunities including convenience shops, small scale supermarkets and associated shops in appropriate locations.</i></p> <p><i>To ensure that uses do not affect the safety and amenity of adjacent, more sensitive land uses.</i></p>	
Heritage Overlay schedules HO375 and HO252	
<p><i>To implement the Municipal Planning Strategy and the Planning Policy Framework.</i></p> <p><i>To conserve and enhance heritage places of natural or cultural significance.</i></p> <p><i>To conserve and enhance those elements which contribute to the significance of heritage places.</i></p> <p><i>To ensure that development does not adversely affect the significance of heritage places.</i></p> <p><i>To conserve specified heritage places by allowing a use that would otherwise be prohibited if this will demonstrably assist with the conservation of the significance of the heritage place.</i></p>	

Design and Development Overlay Schedule 2 – Main Roads and Boulevards

To recognise the importance of main roads to the image of the City.

To retain existing streetscapes and places of cultural heritage significance and encourage retention of historic buildings and features which contribute to their identity.

To reinforce and enhance the distinctive heritage qualities of main roads and boulevards.

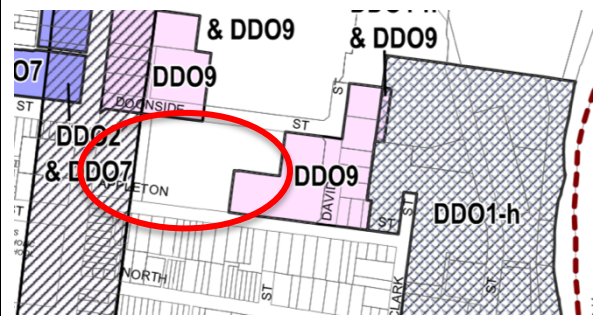
To recognise and reinforce the pattern of development and the character of the street, including traditional lot width, in building design.

To encourage high quality contemporary architecture.

To encourage urban design that provides for a high level of community safety and comfort.

To limit visual clutter.

To maintain and where needed, create, a high level of amenity to adjacent residential uses through the design, height and form of proposed development.



40. It is noted that both the existing Heritage Overlay (HO 252 and HO375) and Design and Development Overlay Schedule 2 (DDO2) will continue to apply to the site with no modification proposed as part of this Amendment.

3.4 Particular Provisions

41. I note that there are several provisions at Clauses 52 and 53 and 58 which will be applicable at the time a permit application is under consideration for the land and a detailed assessment of individual building forms and land uses can be assessed. The consideration of these clauses is not of direct relevance to the consideration of the Amendment.

3.5 Other Strategic Documents

42. There are several strategic reference documents contained within the YPS that are relevant to this Amendment and which provide significant strategic support for the rezoning that is proposed. These documents include:

- *Victoria Street Structure Plan (2010)*

- *Victoria Street East Precinct UDF* (2005)
- *Draft Housing Strategy* (2019)

43. The following sections of this report consider the guidance and support provided by these documents together with the current policy provisions of the YPS in the consideration of the Amendment.

04 Analysis of the Amendment

44. A comprehensive analysis of the Amendment from a planning perspective must examine two primary questions:

- the strategic role of the subject land within the precinct and broader context and extent to which it will contribute to the ongoing land use and development objectives for Yarra; and
- the suitability of the subject land for an alternative use, being mixed use, and the nominated planning framework to facilitate a redevelopment.

45. The consideration of the Amendment includes a review of the pattern of development that has already occurred to support a growing residential community, the opportunities available to continue this objective as well as the interfaces that the affected land shares with surrounding land and road networks. These matters ultimately determine the extent to which a mixed use development can contribute to the future land use planning for the area and the net community benefit achieved.

46. The following sections of this statement examine the policy history that supports the Amendment, considers the key elements of the proposed planning controls and summarises my recommendations for further refinement.

4.1 The Strategic Vision for the Eastern Precinct of Richmond

47. The primary outcome of this Amendment is to update the zoning of the subject land and introduce overlay controls that together will facilitate development of both a commercial and residential nature. Effectively the Amendment will allow for the land to transition from its industrial past, which was once the focus of the eastern end of Richmond, into a contemporary mixed use environment that is fast becoming the identity of inner Melbourne.

48. This is not an unexpected change for the subject land. It is in fact underpinned by a clear strategic vision that has formed part of the YPS for many years, which has identified the future role of the subject land in the context of this precinct of Richmond.

49. Successive strategic plans over the last 15 - 20 years for Victoria Street and the land extending along Burnley Street between Victoria Street and Bridge Road have examined the potential for redevelopment to occur for this large and diverse area. The extent of anticipated change will in the fulness of time result in the historic industrial activity that once dominated the eastern end of Richmond becoming a precinct that will accommodate high density housing, major retail activity and a range of other commercial and complimentary uses to support a new community. In short, the strategic planning framework promotes substantial

change to occur, providing for the ongoing population growth that has been so significant within Richmond for at least the last 20 years.

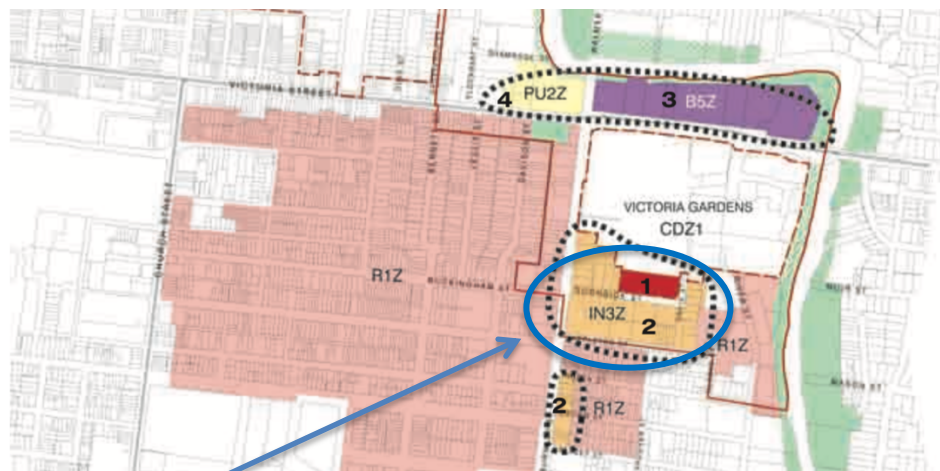
50. To a significant degree the transition for this precinct started with the construction of the Victoria Gardens Shopping Centre which was completed in 2003. This project turned a once disused industrial parcel of approximately 12 hectares into a major retail centre. Following this the construction of a number of higher rise residential buildings occurred immediately surrounding the centre in 2010, representing the transformation of the precinct was taking hold. The *Victoria Street East Precinct Urban Design Framework* of 2005 and then the *Victoria Street Structure Plan* of 2010 were prepared during this first phase of major change. These strategic plans continued to refine the vision for this precinct, focusing on managing the expected physical and social infrastructure necessary to support the ongoing population growth and ensure the emerging land use pattern and new built form created a mixed environment where employment and housing could co-exist.

51. A number of key strategic themes of both the Structure Plan and the Urban Design Framework focused on the opportunities that the once industrial land south of Victoria Gardens Shopping Centre provided and the desire to have this area accommodate intensive built form. These key themes include:

- Promotion of increased housing opportunities that will deliver diversity to accommodate the changing demographic of Richmond;
- Facilitate substantial change for large former industrial sites to provide more intensive mixed use development, including housing, retail and commercial activity that will complement the Victoria Gardens Shopping Centre;
- Provide for a transition in built form between the Victoria Gardens Shopping Centre and the lower rise residential land south of Appleton Street;
- Encourage built form that engages with the street network and provides an active interface; and
- Creation of a fine grain network of pedestrian streets, through block links and open spaces that will enhance the permeability and amenity of the precinct.

52. Furthermore, both the Structure Plan and the Urban Design Framework specifically identified the subject land as having potential to be redeveloped for both a mix of high density housing and commercial activity, and acknowledged these uses would require rezoning to facilitate such a transformation. The extracts below of these two documents identify this clear strategic intent for the

subject land and have formed the basis for the strategic justification of the Amendment:



MIXED USE DEVELOPMENT OPPORTUNITIES

1. Existing 'Sensitive Use Buffer' within Victoria Gardens due to nearby chemical industries. Eventual change to a Mixed Use Zone is recommended if made possible by changes in nearby industries.
2. Change Industrial 3 Zone to Mixed Use Zone to enable a mix of commercial and higher density residential uses. This would help to create an appropriate transition between Victoria Gardens and nearby residential areas, and would reflect existing commercial uses along Burnley Street.
3. Encourage residential development above commercial uses at street and river levels north of Victoria Street.
4. Consider rezoning the Fire Brigade site (which has recently been sold to a private developer) from a Public Use Zone to Business 5 Zone to match the area to the east.

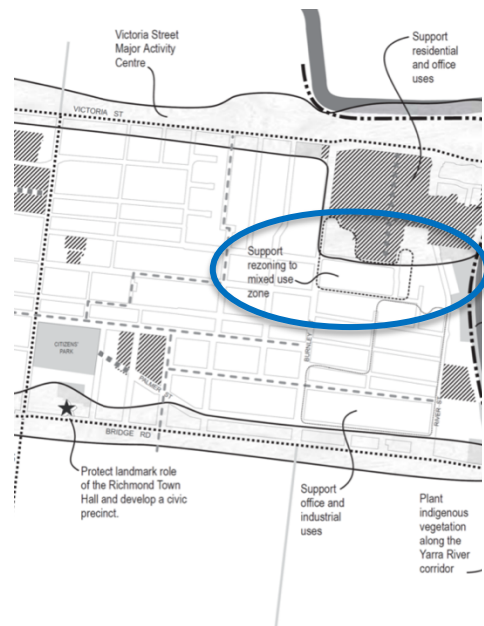
53. The strategic commitment for change to this precinct has also formed part of the MSS for over a decade, with the Victoria Street East Precinct examined at Clause 21.08-9 and the local policy specific to this area at Clause 22.11 of the YPS. Acknowledging these particular clauses have not been amended for over 10 years, it is recognised that even though extensive redevelopment has already

occurred, a number of key sites are still available for substantial development, meaning the policies remain relevant.

54. Specifically addressing the subject land, Clause 21.08-9 states:

To the east of Burnley Street is an area of mixed industrial character with a pocket of low rise residential development. Given the proximity of this area to Victoria Gardens and the limited demand envisaged for the reuse of large industrial sites, there is potential for a wider range of employment uses including offices to locate in this precinct. It is important to:

- *Protect the pocket of Residential 1 zoned land.*
- *Provide land use close to the Victoria Gardens Activity Centre that supports the role of the centre i.e. residential plus mixed uses.*
- *Continue to retain industry but allow office development further south and east of the Residential 1 and Mixed Use areas.*

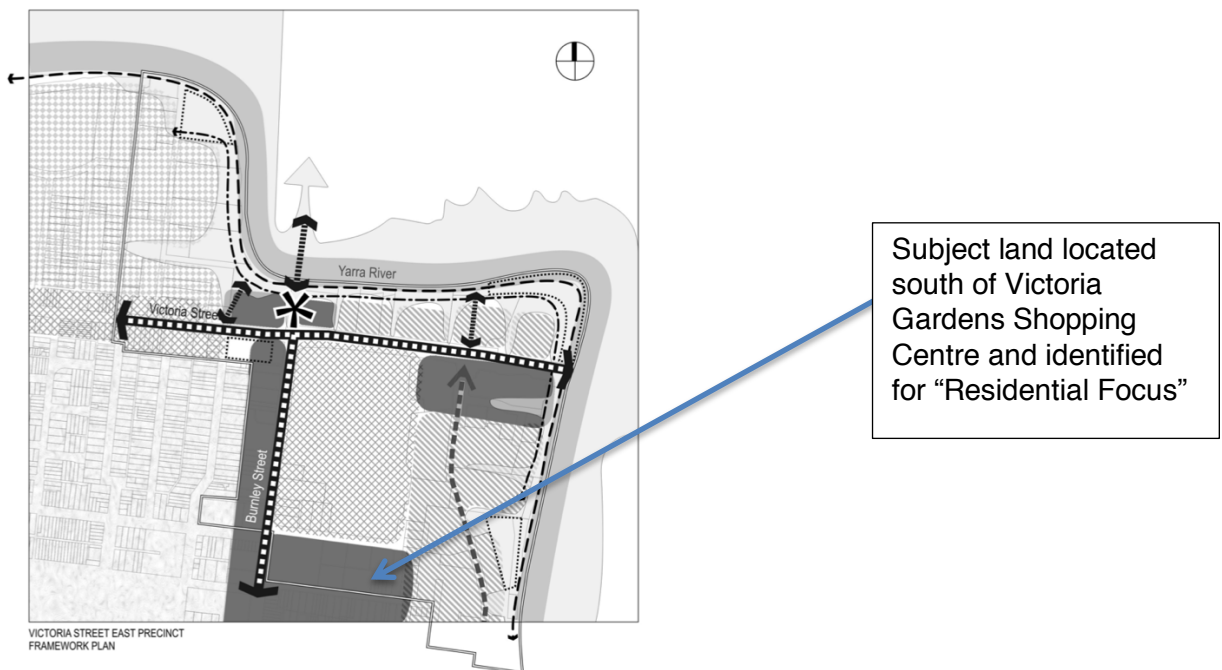


55. The local policy at Clause 22.11 also provides valuable guidance as to the intensity of change expected and the anticipated land use and built form outcomes. The objectives of this clause under 'land use, activity and development opportunities' include:

- *To facilitate a mix of land uses appropriate for land forming part of the Victoria Street Major Activity Centre.*
- *To maximise opportunities for new development on former industrial sites and other disused sites while protecting the amenity of the surrounding area and enhancing the landscape character of the River corridor.*
- *To provide for higher intensity residential development within the Major Activity Centre where this will not be discordant with the built form and amenity of residential areas to the west and south of the Precinct.*
- *To protect existing industrial activities in the Industrial 1 Zone adjacent to the Precinct, while supporting opportunities for a shift from industrial activity to business activity within the Precinct.*
- *To create new local employment opportunities and protect existing ones, especially in the nearby CUB precinct*

- *To encourage the relocation of dangerous industry from the area south of Victoria Gardens and encourage more appropriate redevelopment as a transition between Victoria Gardens and residential areas.*

Similar to the plan of the precinct contained at Clause 21.08, the framework plan included at Clause 22.10 for the Victoria Street East Precinct confirms the expectation for a change in land use for the subject land and nominates a focus on residential activity.



56. At a State policy level, the introduction of *Plan Melbourne 2017-2050* in 2017 may not provide any specific strategic support for the ongoing development of Richmond or the precinct within which the subject land is located, but it has cemented the importance of creating mixed use neighbourhoods that vary in density and employment opportunities. The clear policy directives of Plan Melbourne focus on promoting increased choice of housing, facilitating thriving local economies and strong employment opportunities, providing for a range of services to support local communities, transport networks that are sustainable and a safe and accessible public realm.
57. To a significant degree the Richmond area has the potential to create an environment where the objectives of Plan Melbourne are fully realised. Areas where dense residential development is able to support a broad range of households and also provide access to an extensive range of services and employment opportunities are all key elements espoused by the Plan.
58. Overall, the overarching policy objectives which are embedded into the YPS and the clear strategic direction provided for the Victoria Street East Precinct are

directly supportive of the proposed Amendment. It is a site that can provide for new higher density housing which is well supported by the activity centre network and deliver employment opportunities through retaining existing commercial activity. In this respect the proposed Mixed Use Zone together with the DPO are the vehicles which will deliver the policy objectives that already form the basis of the MSS and the PPF.

4.2 Strategic Contribution of the Subject Land

59. Taking into account the significant areas of historical value that extend across Richmond, which are not suitable for substantial change, and the many strategic sites that have now been fully developed, the eastern end of Richmond focused around Burnley Street does represent an important opportunity. It is for these reasons that the MSS and supporting strategic plans have given unequivocal support for the rezoning of the land and development of a high density, mixed use activity.
60. In this regard the areas of Richmond that still have the capacity for substantial change play a critical role in realising this vision and ensuring that all opportunities for accommodating the population are maximised, within reasonable limits. Given there is a finite supply of land suitable for development within the municipality it is imperative that each strategic site can deliver to an optimum level.
61. As previously outlined, the substantial growth and change that has already occurred within the Victoria Street East precinct over the last two decades is significant. What we see today is construction at the intersection of Burnley and Victoria Streets that is well advanced, delivering residential activity of between 7 to 10 levels with ground level commercial uses. Built form extending south along Burnley Street itself has already been constructed at 7 levels, providing a strong supply of residential accommodation and a new project at 171 Buckingham Street of between 5-7 levels which has recently commenced. Whilst the Victoria Gardens Shopping Centre has been in place for 17 years, land to the east side of the centre still provides opportunities for new development to occur and has been approved between 8 and 13 levels.
62. In contrast to this pattern, the land to the south of Doonside Street extending to Bridge Road, has not been significantly modified during the same period and presents a number of challenges. These include the extent of low scale residential properties within a Heritage Overlay precinct, the fragmented land ownership of some of the commercial / industrial land and the number of different zones in place that constrain future development. The only exception to this being the presence of some new built form to the western side of Burnley Street.

63. The following aerial photo of the precinct demonstrates this pattern of change:



64. For inner urban locations like Richmond, population projections will continue to guide development needs together with the demands on local employment, services and facilities to meet the requirements of the population and infrastructure capacity. These are not static elements and there is no end point to which we must aim. In fact, it is an obligation on local and State governments to ensure there remains an adequate supply of land to meet all the needs of the community.

65. In response to this obligation, it is imperative for Council to regularly reassess where there may be opportunity for strategically significant redevelopment to occur within the precinct moving forward. This assessment needs to examine the future population growth, the attributes of each possible site or precinct and its connections with the surrounding area, the physical constraints that might limit a sensitive use and the extent to which a mix of land uses could be provided to address identified demand.

66. So whilst the MSS together with the existing Structure Plan of 2010 and the Urban Design Framework of 2005 have established the subject land is suitable to accommodate substantial change within the precinct, it is essential when

considering the scope of the Amendment to ensure it will facilitate the highest and best land use for the future.

67. An assessment of the key attributes of the subject land which contributes to it being an important strategic redevelopment site and one where the future outcomes must be optimised include:

- The substantial size of land at just under 1.3 hectares and currently in one ownership. This provides the capability of being developed in an integrated and co-ordinated manner, unlike the fragmented land holdings further east and south;
- Direct interface with the Victoria Gardens Shopping Centre to the north providing the opportunity for commercial activity of a complementary nature to be provided on the subject site;
- Minimal built form constraints in the form of heritage structures to integrate with any new development proposal. The existing buildings are sited in a manner that will allow for adaptive reuse and opportunity for restoration of the built form to be undertaken as part of a development scheme; and
- Connection with the existing road network including an interface with Burnley Street which allows for a more robust built form to be accommodated and efficient access arrangements to support a change in land use activity;
- Remediation of the site to occur in a co-ordinated manner, benefitting the wider community.

68. All of these attributes make it a critical part of the eastern precinct of Richmond and in many respects an exceptional opportunity to deliver on the broader strategic vision. Given the scope of what has already been developed and the limitations on future change to the precinct, this site must be valued as a key strategic asset.

69. The following sections of this report examine how the proposed controls will allow for the development of the land to achieve an outcome commensurate with its role in the precinct.

4.4 The Proposed Planning Framework

70. The redevelopment of the subject land does require a new set of controls tailored to specifically respond to the needs of the project and the stages it will follow through to delivery. This framework is not to be read in isolation and does not sit separate to the rest of the YPS. This is made clear by the first purpose of both

the Mixed Use Zone and the Development Plan Overlay which is “*to implement the Municipal Planning Strategy and the Planning Policy Framework*”. It is therefore important to remember that the key policy messages and directions that form part of the YPS overall will continue to guide the consideration of any future proposal.

71. With this in mind, the process of drafting the required planning controls to guide the first stage of the project should achieve the right balance between establishing clear objectives to respond to the site-specific requirements for future development and broader policy. It should:

- not be overly prescriptive but allow for a degree of flexibility that will foster design innovation and provide scope for alternative solutions that can be demonstrated to deliver net community benefit;
- establish a clear vision for the land and ensure the community has an understanding of what broad development outcomes are to be achieved;
- not seek to regulate the specifics of the social or economic outcomes as this is a matter for consideration outside of this arena.

72. The Amendment has focused on introducing three key planning tools to the YPS to facilitate the renewal of the site. These include:

- A Mixed Use Zone that will allow for a range of building types, density and scale and to also facilitate non-residential uses to be accommodated;
- A Development Plan Overlay that will create the framework for the ultimate development proposal, establishing the parameters for building envelopes, land uses, landscape design, sustainable development, access, parking and circulation and other matters of detail.
- An Environmental Audit Overlay that will address the necessary process of remediation of the site to allow for the future sensitive land uses.

Application of the Mixed Use Zone

73. Given the context of the land in terms of its adjacency to the Victoria Gardens Shopping Centre to the north, the higher density development that has occurred recently to the east and the interface with surrounding residential land to the south of a lower scale, a new zone that can both maximise the site’s potential and remain responsive to its context is essential.

74. The proposal to replace the existing Industrial 3 Zone with the Mixed Use Zone is in my view a logical and suitable choice for a number of reasons. It is a zone that can address two of the key aspirations of this Amendment; delivery of new housing at higher density and to facilitate a mix of residential and non residential activities to provide for a range of employment opportunities for the local

community. These two development objectives in fact form the basis of the purpose to the Mixed Use Zone, immediately confirming the compatibility with this project.

75. Furthermore the Mixed Use Zone is without a default height control, without any density or garden area requirement and yet remains sensitive to matters of neighbourhood character and amenity. It is however still part of the suite of residential zones contained within the Victoria Planning Provisions and remains focused on the creation of a predominately residential environment.
76. The application of the Mixed Use Zone within the metropolitan context of Melbourne is typically applied to land that is proximate to an activity centre, creating a “transition” between the higher density, mixed environments that surround the heart of an activity centre and the more conventional, lower scale residential areas beyond. It is often used across inner urban areas where there is a policy intent to maintain a balance between commercial activity that can generate employment and deliver on a growing need for mixed forms of housing.
77. The Practice Note 78 identifies that the Mixed Use Zone may be appropriate for areas that are:
- *Planned for more intense and diverse residential development on sites well located in relation to activity centres, employment and public transport;*
 - *Brownfield or urban renewal sites;*
 - *Planned for apartment style development.*
78. It is clear that the built form and land use mix proposed as part of the renewal project for the subject land addresses each of these dot points and therefore the application of the Mixed Use Zone is appropriate.

The Proposed Development Plan Overlay Schedule 15

79. The guidance provided by Planning Practice Note 23 – Applying the Incorporated Plan and Development Plan Overlays seeks to explain the function of each control, when to use each overlay and how to approach the drafting of a schedule.
80. The application of a Development Plan Overlay to single site or area will:
- *require a plan to be prepared to coordinate proposed use or development, before a permit under the zone can be granted;*
 - *guide the content of the plan by specifying that it should contain particular requirements;*

- *provide certainty about the nature of the proposed use or development;*
- *remove notice requirements and third-party review rights from planning permit applications for proposals that conform to plan requirements;*
- *ensure that permits granted are in general conformity with the plan;*
- *apply permit conditions that help to implement the plan; and*
- *provide statutory force to plans.*

81. Given the historical use of the subject land, its overall area at just under 1.3 hectares and its interface with a number of well-established but diverse land uses, the application of a Development Plan Overlay to guide a co-ordinated mixed use development across the site is the most appropriate tool in this context. Alternative overlays that still create the need for a master plan to be developed, such as the Incorporated Plan Overlay, are unnecessarily restrictive in the context of this site and nature of the proposed redevelopment.

82. I note that the existing Design and Development Overlay Schedule 2 affecting the western frontage of the site and the two heritage overlays will remain in place. As such any new schedule to the Development Plan Overlay must also acknowledge this existing planning framework.

83. In considering the Development Plan Vision and development plan requirements contained within the proposed Schedule 15 of the DPO (DPO15), I have reviewed the background documentation and analysis that has been prepared to support the Amendment which provides an outline of the intended future development of the site. This documentation includes the following reports:

- Planning report (Tract Consultants, December 2018) which provides a detailed overview of the site, opportunities and constraints for development and the potential for a comprehensive development that incorporates various building forms and a range of land uses, public open space and streetscape improvements;
- Heritage impact statement (Bryce Raworth, December 2018) examining the built form on the land to be retained and incorporated into a future design;
- Traffic impact report (Ratio Consultants, December 2018) which considers the potential changes to access arrangements and implications on the broader traffic network;
- Economic assessment report (Deep End Services – December 2018) which considers the employment market for the precinct and the

contribution a future development on the site could make to this market place; and

- Environmental sustainable design report (GIW – December 2018) which highlights the potential for any new mixed use development to be sustainable and innovative in its approach to ESD.

84. These documents examine in detail the existing conditions and site context, identify various constraints for future development and the opportunities for delivering on the desired objectives for increasing housing, commercial activity and associated services.
85. The Development Plan Vision is important as it establishes the overall approach to future development of the site and should be read in conjunction with the Indicative Framework Plan. It identifies the many influences that contribute to the amenity of the site at present and how these elements must be integrated into the future development plan to ensure the surrounding residential neighbourhood continues to experience a positive living environment. The potential for new built form at various heights, setbacks to key interfaces, circulation networks and potential for overshadowing form key foundations of this document which are then reflected in Schedule 15. How a future development plan may respond to these issues is the subject of the next stage of the process and is not a matter for consideration at this stage.
86. The key elements of the proposed Schedule 15 that provide the appropriate guidance for the preparation of a development plan include:
- The defined objectives which establish the expectations for the development outcomes across the site;
 - Clarity as to the expected building heights to be explored across the site, defined on a precinct basis and responding to the proximity to lower scale existing residential development to the south or heritage-built form that is to be retained. I note these building heights are discretionary, which I consider is appropriate given this project needs a level of flexibility to explore various design outcomes;
 - Clarity as to the expected setbacks for built form that have interfaces to the external road network and future pedestrian link;
 - The expectations for new open space provisions;
 - Expectations for active frontages to be provided to key frontages; and
 - Broad scope of the mix of land uses that could be accommodated across the site in a manner that promotes a mix of residential and commercial activity.

87. The required documents, plans and reports generally address all relevant documentation for a project of this type. These documents will be required to specifically define the scope of development for each individual component and then provide clear resolution as to how the overall site will be cohesively developed.
88. I consider it relevant to note that the proposed Schedule 15 requires that a development plan for the whole of the land be prepared as one document. I see this as a strength and whilst a staging plan may well be prepared to stipulate how the overall delivery of the master plan will occur, the land must first be considered as a whole. Any early works that can be undertaken on the site are limited and defined in a manner that should not prejudice the future development of the site or the achievement of the broader objectives.

4.5 Recommended modifications to Schedule 15

89. Like any Amendment of this detail and application, there are always elements that might benefit from further refinement and there can be some potential outcomes that come to light which were an unintended consequence of the provisions. An independent review of any new control to be introduced into a planning scheme provides the opportunity for these matters to be examined, with the benefit of understanding issues raised by submitters and any changes to the broader planning context that may have occurred since the control was first drafted.
90. In this regard I note that a number of submitters to the Amendment raised questions regarding the scope of development to be facilitated by the proposed DPO15. As part of my assessment I have considered these submissions and the modifications made by the City of Yarra to the exhibited DPO15 as reported at the Council meeting of 3 March 2020.
91. The following provides a summary of my key recommendations for where modification to DPO15 is considered necessary, having reviewed all material available. These recommendations are aimed at ensuring the key objectives and vision for the site can be delivered efficiently and to improve, where possible, the approach required when preparing a development plan in the future.
92. In line with the guidance provided by Planning Practice Note 23, the Overlay should provide an appropriate level of guidance that will allow for a development plan that:
- Is concise and flexible;
 - Is not be onerous for the proponent to prepare;
 - Is not be overly prescriptive;

- Contain objectives and performance measure to help the responsible authority determine if a proposal is generally in accordance with the schedule.

93. It is noted that whilst the following recommendations identify the key revisions that require some explanation, a tracked changes version of the policy at Appendix B also nominates a number of small changes to the wording of clauses which have not been summarised below.

Recommendation 1: Refinement of the indicative framework plan

94. A key element of DPO15 is the Indicative Framework Plan (the Plan) provided at page 5. This Plan seeks to graphically identify the various expected outcomes for the site from a built form perspective and would form a key aspect of the assessment of a future development plan.

95. Accepting the principles that the Plan is seeking to communicate and the certainty it provides to all stakeholders, there is in my view an opportunity to simplify this Plan whilst maintaining the intended vision.

96. A review of the Plan, together with the requirements of the Built Form Guidelines and Concept Plans, would suggest there is the potential for it to be interpreted in a manner that may unnecessarily constrain future development of the site and therefore have unintended consequences. The following modifications are recommended so as to reduce repetition (when read with the Built Form Guidelines) and ensure the optimal development potential of the site is realised through a future development plan:

<p>Nomination of building envelopes</p>	<p>The current Plan shows a dotted outline for what could be construed as the expected position of individual towers above a podium. These dotted outlines have clear setbacks from street walls and heights. In my view this layout could be pre-determining an outcome in terms of the placement and number of tower forms above a podium that are to be provided and may result in any alternative building layout being deemed not “generally in accordance with” the Plan. I note that the report to Council on 3 March 2020 does make specific mention of there being <u>six</u> towers proposed for the land, which would suggest the dotted outlines are deliberately intended to represent the expected number of building forms.</p> <p>In my opinion there is no need to stipulate the position of future buildings to this degree and in fact the preferred approach is to allow for architectural creativity in the final design response that may result in a more varied design</p>
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	<p>response. In any case the necessary justification of the future envelopes is the task of the final development plan, responding to all other requirements.</p> <p>It is therefore recommended that the dotted lines shown to identify building forms be deleted.</p>
Nomination of building height	<p>The Plan currently shows building heights in both metres and storeys across the land. In my view a Plan of this nature contained within a DPO should nominate either storeys (as has been the approach in other DPO schedules within the YPS) or height in metres. But not both as it can unnecessarily restrict the final land use mix within the future building(s) as well as the need to match floor to floor heights of existing heritage buildings. Some level of flexibility is desirable in this regard, particularly when buildings are not yet designed in detail. In this regard the nomination of height only in storeys, or a range of storeys, is preferable.</p> <p>I note that the nomination of building heights on the Plan has been examined by Ms Heggen as part of her urban design evidence statement, including the potential impact of overshadowing as a direct result of different heights across the land. This included modelling of building envelopes in three dimensions to determine to what extent a shadow would be cast to the southern side of Appleton Street and any public open space.</p> <p>If it is determined that the primary purpose or advantage of nominating preferred heights on the Plan is to set the limit within which overshadowing to the lower scale residential properties to the south does not occur (between 10am and 2pm at the equinox), then I support the approach of the Suggested Indicative Framework Plan on Page 12 of Ms Heggen's evidence on this point. Particularly as it has been based on quantifiable outcomes. In this regard I acknowledge that the Built Form Guidelines of DPO15 as exhibited does make reference to the need for shadow diagrams to be prepared as part of a Development Plan and therefore it is clearly an important consideration.</p>
Setbacks	<p>It is noted that the setbacks nominated on the Plan are repeated under the Built Form Guidelines. This repetition appears unnecessary and, in some cases, leads to the</p>

	<p>expected layout of the built form to be identified. It therefore is recommended that the setbacks be deleted from the Plan in preference for the text, where some further detail regarding the intent of these setbacks can more readily be provided.</p>
Active frontages	<p>The Plan currently shows ‘active frontages’ along some sections of the site as it interfaces with the main roads. It is unclear why these sections of the site have been nominated and not others.</p> <p>The concept of active frontage can mean many things depending on the context and site constraints, such as historic built form. It does not need to mean large areas of clear glazing must be provided or multiple points of entry in order to be deemed ‘active’. It could in fact be a combination of the internal ground level land uses being of a nature or design that allow for some activity to be seen from the street and the strategic placement of entry ways. I consider an active frontage could equally be achieved to the Burnley Street building within the constraints of the heritage fabric and would be beneficial to the streetscape. This is in fact consistent with the text under Built Form Guidelines as shown on page 6 of the draft DPO15.</p> <p>It is recommended that the areas nominated for “active frontages” be deleted from the Plan in favour of the reference remaining in the Built Form Guidelines.</p>
Mix of uses at the southern edge and north eastern corner	<p>Given the surrounding mix of land uses (consistent with zoning patterns) and the potential to develop a truly mixed use project on the subject land, it would be preferable that the Plan provides for a greater degree of flexibility as to where different land use activities could be located. For example, there may be potential for a home office component to be provided along the Appleton Street edge and the north eastern corner of the site could accommodate a greater mix of commercial and residential uses within the same building(s). Opportunities such as these may result the overall vision being achieved and any off site impacts can be appropriately managed.</p> <p>It is therefore recommended that the range of uses for particularly the “pink” and “orange” zones be reconsidered in</p>

	favour of a more mixed use outcome being possible for the future development plan to explore.
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Recommendation 2: The need for an economic assessment report

97. It is noted that the documentation provided by the proponent and which was exhibited with the Amendment included an Economic Assessment prepared by Deep End Consultants. This report provided an assessment as to the strategic and market justification for a mixed use development on the land and an analysis of the local and regional economic outcomes as a result of the development. A report of this nature is considered to be of value in the overall assessment of the Amendment, to determine the net community benefit from an economic perspective that would be expected from a development on the site and therefore whether the rezoning is appropriate.
98. However, the need to prepare an economic assessment which identifies viable employment generating uses for the site at the time a development plan is prepared (prior to any detailed permit application) is unnecessary for the consideration of an appropriate development plan.
99. Within the table of land uses permitted under the provisions of the Mixed Use Zone, a range of retail and commercial land uses could be accommodated on the site. This in turn may allow for a significant number of individual small, medium and larger businesses to establish across a range of industries and generating employment to the local and regional communities. This mix of businesses may change over time together with the number of employees that work and live on the site. As such the assessment could only ever be a prediction of what may be possible at a particular point in time.
100. What is important to highlight is that it is not the role of the planning scheme to adjudicate as to whether these activities reach an appropriate threshold for job creation either for the site or the precinct. The planning scheme must create the regulatory framework within which a range of non-residential use that may contribute to employment and economic activity (if desirable) and how these integrate with other commercial and retail activities and interface with more sensitive land uses.
101. Furthermore, the extent to which any one business or industry may be able to generate employment (full or part time) and for how long this may occur is a complex issue that is influenced by broader economic conditions and market forces. It may be subject to change as a result of these conditions, as we have recently seen with the global pandemic, and it may also be feasible that a particular industry or business is in fact attracted to the site that could not have been foreseen at the time the economic assessment was prepared.

102. Whilst such a requirement has been stipulated within the YPS for other sites, these are typically very substantial in area with far greater potential to accommodate a broad range of retail and commercial activity that may need to be carefully planned for, including the extent to which any one industry may be accommodated as part of a future activity centre. Such an example is the Alphington Paper Mill site (affected by Development Plan Overlay Schedule 11) where a total of 16 hectares of land is to be developed, including commercial floor space of some 15,000 square metres. In this situation an economic assessment has assisted to ensure the 7 different precincts across the land will provide for diverse and complementary commercial activity.
103. For the subject site at just under 1.3 hectares and located immediately within an established major activity centre, the need for an economic assessment to identify future employment generating land uses that could be accommodated is not the same. Nor is it clear how such an analysis will be assessed by the responsible authority or would need to be updated and modified as conditions change over time.
104. I therefore recommend that this requirement be deleted from DPO15.
105. I do however support the requirement for employment generating activity to be accommodated on the land as identified under the Built form Guidelines. In my view this requirement could benefit from some clarification to ensure the scope of “employment generating activity” is understood. This is important as it is a term not defined in the YPS and could be open to interpretation and debate, restricting opportunities within current economic and social conditions to deliver a diverse range of employment.
106. I therefore recommend that the requirement be modified to include the additional text:
- At least 9,000 square metres of gross floor area provided for employment generating activities, including but not limited to, office, retail, showroom, warehouse, food and drink premises, service industry and leisure and recreation.*
107. It is important to highlight that under the provisions of the Mixed Use Zone, a planning permit is required for many of these land uses and therefore the final placement across the site, integration with other land uses (and surrounding land) and amenity impacts will still be the subject of a planning permit process in the future.

Recommendation 3: Required Detail for the Development Plan

108. In line with the principles of a Development Plan Overlay as outlined previously, an appropriate balance needs to be struck between seeking a level of

detail in the development plan so as to achieve the desired vision and still allowing for a creative and innovative design solution. In essence the DPO needs to establish a clear vision and the key parameters for the final Development Plan but equally it must be accepted that a detailed design of each built form across the site is neither desirable or appropriate at this stage. It needs to remain a master plan, where the over-arching approach to the future development is defined and its integration with existing context and response to surrounding land uses is considered. But there remains a final stage in the statutory planning process, being the planning permit, where detailed design of each individual building and land use activity should be fully resolved.

109. Having considered the scope of the exhibited DPO15 it is my view that some of the listed components of the future development plan may have jumped forward to the final stage and could not reasonably be understood at the time a development plan is being prepared.
110. Having reviewed the many schedules to the Development Plan Overlay that have previously been incorporated into the YPS affecting a range of different sites across the municipality (many of which continue to apply) it is evident that the Council's requirements for a development plan have become progressively more onerous and detailed as each schedule to the DPO is drafted.
111. It is also evident that some requirements that are stipulated for very substantial sites that are complex and have many unique constraints and opportunities are now being applied to more recent schedules affecting much smaller parcels, such as the subject property.
112. In this regard it is recommended that some of the requirements of the draft DPO15 would benefit from simplified wording, reduced detail and elimination of repetitive requirements or objectives. These changes are not intended to alter the over arching vision or to create uncertainty as to the final built form outcome but rather are focused on ensuring the appropriate level of detail is delivered when preparing the development plan compared to the final planning permit stage.
113. To demonstrate the areas where some modification is considered appropriate in this regard Appendix B of this report provides a tracked changes version of the schedule (as exhibited). Annotations to explain the reasons for some changes have been provided to ensure the intended outcome is understood.

Recommendation 4: Public Realm Plan

114. One of the requirements of DPO15 is to have a public realm plan prepared which considers the way in which the proposal will contribute to improving public space. The broad scope of this plan appears to be appropriate in the context of a

large site where public open space is to be provided together with a pedestrian lane.

115. However the requirements of the plan suggest there is an expectation that there should also be a contribution to upgrading the streetscapes of Doonside and Appleton Streets. This would include *“public infrastructure works such as footpaths, bike paths, street lighting, furniture and street trees”*.
116. It is certainly expected that any major construction site must rectify damaged footpaths, replace street trees and lighting and where cross overs are removed provide for additional on street parking at the completion of a project. But it is unclear whether this provision is expecting the land owner to make a contribution which goes beyond ensuring the public realm is “reinstated” post development but to consider a suite of new street improvements.
117. In the absence of any development contribution plan applying to the land at present that might clearly outline the infrastructure works required of any one land owner (recognising the proposed DCP Overlay under Amendment C238 has not yet been imposed) and acknowledging the contribution which will be made to public open space, it is recommended that the scope of this requirement needs to be clarified and the plan requirements refined accordingly.

4.6 Response to Council’s Post Exhibition Changes

118. The report to Council on 3 March 2020 provided a detailed assessment of the submissions received to the Amendment, and explored the potential for further refinements to be made to DPO15 or justification why it was unnecessary to modify the scope of the Amendment. The recommendations that were supported by the Council and which are the subject of a revised DPO15 include:
- a) insert provisions protecting west side of Burnley Street from overshadowing;*
 - b) include wording in the Development Plan Vision by adding ‘and adjoining residential properties to the east’ to the third dot point: To protect the amenity of residential properties on the south side of Appleton Street;*
 - c) include a 9m building separation between new development and the Embassy Apartments directly to the east and south;*
 - d) insert provisions and amend DPO15 to reflect the intention to retain the heritage building at 26 Doonside Street;*
 - e) insert provisions to clarify the expectations for a varied skyline and high quality building materials and design; and*
 - f) insert provisions to clarify the treatment of loading areas and services.*
119. I have considered each of the above recommendations in the context of the site and surrounding area and the matters raised by submitters. My response to the proposed additions to DDO15 are summarised below:

Item	Response
a)	The indicative overshadowing diagrams prepared by the proponent would suggest there will be no overshadowing from the proposed development of the land to the western footpath of Burnley Street between 11am and 2pm at the equinox. Given the value of maintaining a high standard of amenity to public spaces around the site, it is considered the addition of this requirement under the Built Form Guidelines is achievable.
b)	The addition of the wording that will recognise the amenity of the residential land to the east of the site as well as residential properties along Appleton Street is reasonable and appropriate as an objective.
c)	The current built form conditions to the east of the subject land (known as the Embassy Apartments) would suggest that the existing apartment building is setback from the boundary with the subject land approximately 8 metres. To achieve an overall separation between any future built form on the subject land and the Embassy apartments at a total of 9 metres may have merit in order to avoid the need for windows or balconies to be screened to restrict overlooking. However it is recommended that any modification to DPO15 provides scope for consideration of a lesser setback, in the event overlooking between apartment is not of concern due to the proposed layout or position of built form.
d)	Specifically identifying the intention to retain the building to Doonside Street (contained within Heritage Overlay HO252) is considered unnecessary given the clear emphasis on the retention and adaptive reuse of both buildings already in the Schedule. A combination of the Heritage Policy and the required Heritage Impact Statement that forms part of DPO15 will guide this decision appropriately.
e)	Any additional built form objectives around the choice of materials and finishes and a high quality architectural response is considered unnecessary and overly repetitive or in some cases contradictory to other objectives already drafted into DPO15.
f)	The requirement for the treatment of loading areas and site services has already been addressed as part of the Transport Assessment. it is important to note that the placement of services and in some cases loading access can not be determined until a more detailed design process occurs and therefore additional wording to DPO15 is considered unnecessary.

120. As noted earlier in this evidence statement it was Council's position post exhibition of the Amendment that additional open space will be sought, however the extent of this additional open space and if it is to be publicly owned space is not known.

121. It is my view that any provision of public open space for the site should be in accordance with the provisions of Clause 53.10 and guided where appropriate by Clause 22.12, which addresses the expectations for providing open space and the size / scope of this space.
122. At present the provision of 576 square metres of public open space on the site would meet the requirements of the YPS. This is further enhanced by the provision of a pedestrian laneway that extends through the site, although it is accepted this will not be a publicly owned space but will be accessible throughout the day.
123. Any additional provision of public open space would therefore be beyond the requirements of the planning scheme.

05 Conclusions

124. Having considered the key planning issues relevant to the Amendment and specifically the proposed Mixed Use Zone, Development Plan Overlay Schedule 15 and Environmental Audit Overlay, I have concluded that:

- There is clear strategic justification for the rezoning of the land in the manner proposed and will directly achieve the well established vision and objectives for the Victoria Street East Precinct;
- The site has a significant role within the precinct given its physical position and area and as such must be developed to an optimal level to take advantage of this important opportunity;
- The broad scope of the Development Plan Overlay Schedule 15 is considered to be appropriate in establishing a vision for the future development of the land and the expected parameters for the preparation of a development plan;
- The recommended modifications to the Development Plan Overlay Schedule 15 have sought to provide greater clarity and to ensure the development plan provides for an appropriate level of flexibility to guide the final built form and land use outcomes.

125. I am therefore supportive of the Amendment subject to the modifications outlined in Section 4.5 of this report.

Sophie Jordan
Director



Appendices

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Appendix A – Summary of expertise

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Name and professional and business address

Sophie Millicent Jordan

Director, Sophie Jordan Consulting Pty Ltd

Level 25, 500 Collins Street

Melbourne VIC 3000

Qualifications and experience:

- Bachelor of Planning and Design (Hons) University of Melbourne, 1996
- 1997 Town planner, City of Stonnington
- 1998-2001 Senior planner, City of Melbourne
- 2001-2003 Senior planner, Hassell
- 2003 – June 2005 Senior planner, Urbis Pty Ltd
- July 2005 – June 2008 Associate Director, Urbis Pty Ltd
- July 2008 – Dec 2011 Director, Urbis Pty Ltd
- January 2012 – present Director, SJ Consulting Pty Ltd

Area of expertise:

- Residential developments including medium density housing projects through to larger high rise apartment complexes;
- Special needs residential accommodation including student accommodation, retirement villages, nursing homes and social housing projects;
- Large scale commercial projects including office development within inner Melbourne;
- Large scale retail development within metro Melbourne and regional Victoria;
- Preparation of Urban Design Frameworks for regional town centres;
- Public Housing Estate redevelopment and social housing projects
- Gaming applications, including the VCGR approval processes; and
- Heritage applications, including Heritage Victoria approval processes.

Facts, matters and assumptions which the report relies upon:

- Reviewed the exhibited documentation as part of the Amendment including background reports;
- Reviewed all relevant planning controls and policies contained within the Yarra Planning Scheme, including *Plan Melbourne 2017-2050*;
- Reviewed the written submissions that were lodged during the exhibition period;
- Reviewed the Council reports relevant to the Amendment;
- Reviewed relevant Practice Notes and Ministerial Directions; and
- Reviewed reference and incorporated documents to the Yarra Planning Scheme that are relevant to this Amendment.

Documents taken into account in preparing this report:

Refer to paragraph 3 of the report for a summary of the documents that have been taken into account. The assessment and review outlined in the report has relied on these documents to inform my opinion.

Identity of any person who assisted in the preparation of the report

None

Summary of my opinions

Refer to report and conclusions for a detailed summary of opinions.

Expert Declaration

I have made all the inquiries that I believe are desirable and appropriate and no matters of significance which I regard as relevant have to my knowledge been withheld from the Panel.

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Appendix B – Tracked changes version of the policy

--/--/----
Proposed C223yara

SCHEDULE 15 TO CLAUSE 43.04 DEVELOPMENT PLAN OVERLAY

Shown on the planning scheme map as **DPO15**.

81-95 BURNLEY STREET AND 26-34 DOONSDALE STREET, RICHMOND

1.0

Objectives

--/--/----
Proposed C223yara

None specified.

2.0

Requirement before a permit is granted

--/--/----
Proposed C223yara

A permit may be granted for the following before a development plan has been approved:

- Buildings or works necessary for existing businesses or uses to continue.
- Consolidation or subdivision.
- Removal or creation of easements or restrictions.
- Demolition or removal of buildings.
- The construction or carrying out of minor buildings or works, including site preparation.
- Buildings and works associated with or for the purpose of obtaining a certificate or statement of environmental audit under the *Environment Protection Act 1970*; or environmental matters pursuant to any successor legislation, including the *Environment Protection Amendment Act 2018*, where these works do not prejudice the preparation and approval of the Development Plan and the vision for the land set out in this overlay.

Before granting a permit the Responsible Authority must be satisfied that the permit will not prejudice the future use and development of the land and will not compromise the objectives for the site as set out in this schedule.

2.1

Section 173 Agreement to provide for affordable housing

The owner (or another person in anticipation of becoming the owner) must enter into an agreement with the Responsible Authority under section 173 of the *Planning and Environment Act 1987* which requires that the owner must facilitate the provision of 10 percent of the total number of dwellings (being the total number of dwellings provided within the DPO15 area) as affordable housing by:

- Entering into an arrangement with a Registered Agency under the Housing Act 1983 for the provision of the affordable housing within the DPO15 area to a Registered Agency; and/or
- Making other arrangements for the provision of affordable housing in conjunction with a Not for Profit (registered with the Australian Charities and Not-for-profits Commission) to the satisfaction of the Responsible Authority; and/or
- Making other arrangements for the provision of for the provision of Affordable Housing as defined at Section 3AA of the *Planning and Environment Act 1987*, to the satisfaction of the Responsible Authority.

The owner, or other person in anticipation of becoming the owner, must meet all of the expenses of the preparation and registration of the agreement, including the reasonable costs borne by the Responsible Authority.

The Section 173 Agreement must be entered into prior to a planning permit being issued in accordance with the approved Development Plan.

2.2 Section 173 Agreement to provide for public infrastructure

The owner (or another person in anticipation of becoming the owner) must enter into an agreement with the Responsible Authority under section 173 of the *Planning and Environment Act 1987* for the provision of the following items of public infrastructure in accordance with the Public Realm Plan prepared and approved in accordance with this schedule. The works may include but are not limited to:

- Streetscape and public realm improvements to Doonside Street;
- Streetscape and public realm improvements to Appleton Street; and
- A minimum nine (9) metre wide pedestrian lane connecting Doonside Street and Appleton Street at the approximate mid-point of the Site, generally in accordance with the *Indicative Framework Plan* at Figure 1.

The owner, or other person in anticipation of becoming the owner, must meet all of the expenses of the preparation and registration of the agreement, including the reasonable costs borne by the Responsible Authority.

The Section 173 Agreement must be entered into prior to a planning permit being issued in accordance with the approved Development Plan.

2.3 Section 173 Agreement for Traffic Impact Assessment Report works

The owner (or another person in anticipation of becoming the owner) must enter into an agreement with VicRoads and the Responsible Authority under section 173 of the *Planning and Environment Act 1987* for the provision of works which are identified in the Traffic Impact Assessment Report prepared and approved in accordance with this schedule. The works may include but are not limited to:

- mitigating works required for each development stage in the Development Plan;
- a two way or a four way signalised intersection between Burnley Street/Doonside Street/Buckingham Street; and
- a new intersection, if required, approved by VicRoads in consultation with the Responsible Authority.

The owner, or other person in anticipation of becoming the owner, must meet all of the expenses of the preparation and registration of the agreement, including the reasonable costs borne by the Responsible Authority.

The Section 173 Agreement must be entered into prior to a planning permit being issued in accordance with the approved Development Plan.

3.0 Conditions and requirements for permits

--/--/----
Proposed C223yara

3.1 Permit requirements

Except for a permit granted in accordance with Clause 1.0 of this Schedule, a permit must contain conditions that give effect to the provisions and requirements of the approved development plan.

3.2 Heritage Impact Statement

A permit application must include, where relevant:

- A heritage impact statement prepared by a suitably qualified professional that assesses the impact of the proposed development on the heritage values of the heritage place and nearby

heritage places, as identified in the conservation management plan or similar comprehensive heritage analysis prepared for the site, along with relevant heritage studies and citations.

- A siteline analysis and 3D modeling of the proposed development from key view points in the public realm to enable an assessment of the visual impact of the development on heritage places.

4.0

---/---
Proposed C223yara

Requirements for development plan

A development plan must be generally in accordance with the *Indicative Framework Plan* as shown in Figure 1, and the vision set out in this schedule, to the satisfaction of the Responsible Authority.

A development plan must be approved for the whole site, however the land may be developed in stages.

The development plan must include the following sections, all prepared to the satisfaction of the Responsible Authority:

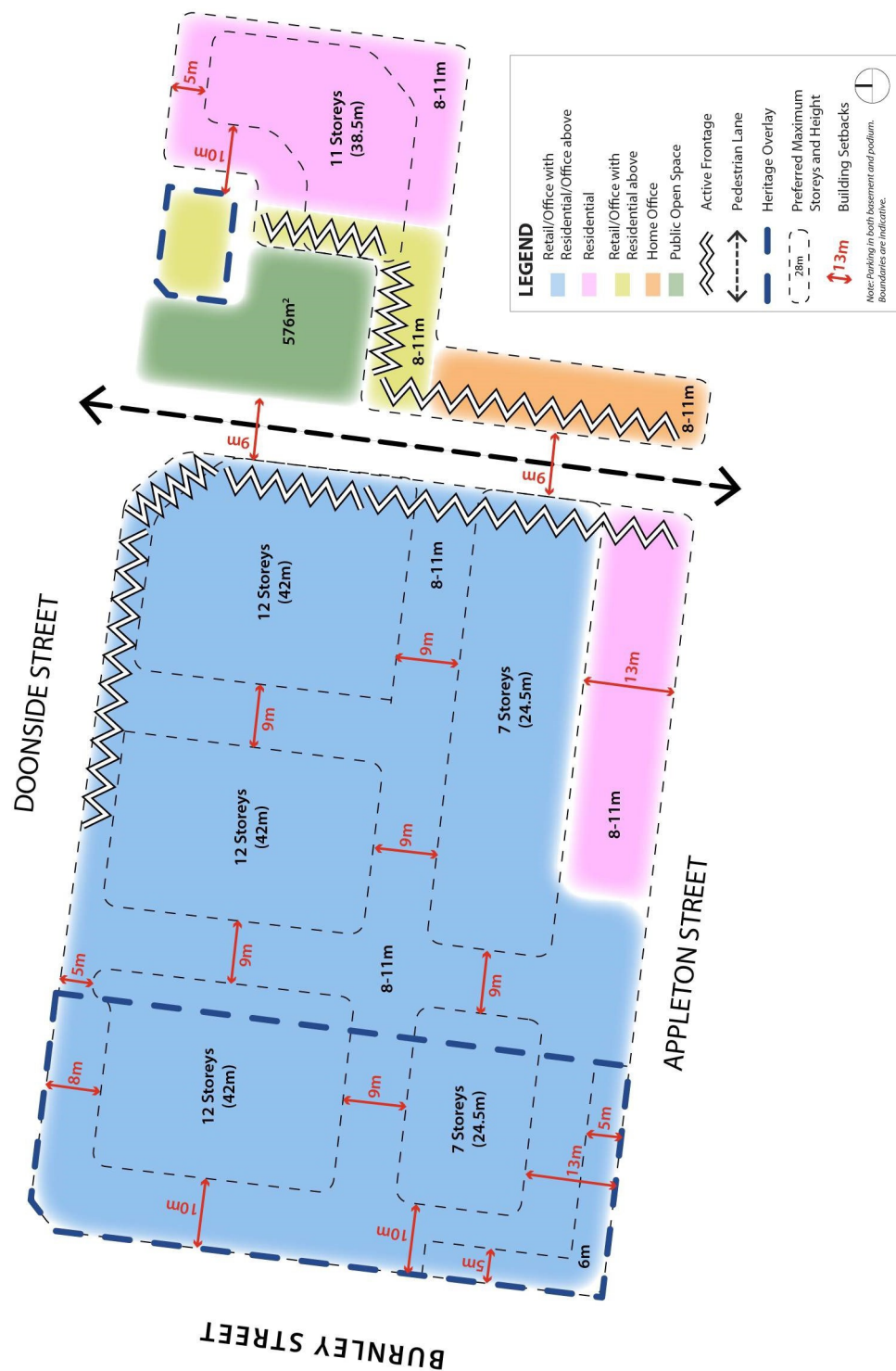
4.1

Development Plan Vision

- To become a sustainable, mixed-use residential community, supported by convenience retailing services, community facilities, and employment opportunities augmenting the role of the Victoria Street Activity Centre.
- To recognise the opportunity of the site's activity centre context, whilst respecting the **amenity of the** low rise residential development to the south **side of Appleton Street**.
- ~~To protect the amenity of residential properties on the south side of Appleton Street.~~
- To provide improvements to the public domain, including pedestrian friendly environments along all street frontages, the provision of public open space and a pedestrian laneway.
- To provide for ~~a high standard of internal amenity~~, building separation and best practice environmentally sustainable design. **SJ Comment: Difficult to establish a 'high standard of internal amenity' at the DP stage and would not be possible to demonstrate without a final design of the buildings. This is a matter for the planning permit assessment.**
- To respect the scale and form heritage places within and adjacent to the site and provide for the conservation of heritage places within the site.
- To ensure that new development mitigates any adverse impact it may generate upon local traffic conditions.
- To provide for the sensitive adaptive re-use of heritage buildings in accordance with the *Indicative Framework Plan* and informed by a comprehensive heritage analysis prepared for the site by a suitably qualified professional that:
 - articulates the significance of the heritage place, its component parts and its setting;
 - describes the relationship between the heritage place and any neighbouring or adjacent heritage place/s; and
 - establishes principles for managing the significance of the heritage place and its relationship with its surroundings.

YARRA PLANNING SCHEME

Figure 1: Indicative Framework Plan



4.2

Components of the Development Plan

SITE AND CONTEXT INFORMATION

A site analysis that identifies:

- the key attributes of the land and its context;
- existing or proposed uses on adjoining land;
- other neighbourhood features such as public transport, activity centres, walking and cycling connections; and
- important views to be considered and protected, including views of existing heritage buildings.

CONCEPT PLANS

Concept plans must include:

- ~~The total number of dwellings across the entire site~~ **An indication of the approximate residential yield for the site;**
- **An indication of the expected** use of each building and estimated floor area for each use, **including any commercial or retail yield;**
- At least 9,000m² of Gross Floor Area provided for employment generating activities, **including but not limited to office, retail, showroom, warehouse, food and drink premises, service industry and leisure and recreation;**
- ~~An indication of the location and approximate commercial and retail yield for the site;~~

A north south pedestrian lane:

- with a minimum width of 9 metres;
- that provides safe and pleasant pedestrian and cycling access between Doonside Street and Appleton Street;
- that receives sunlight between 10am and 2pm at the equinox;
- that remains publicly accessible ~~in perpetuity~~ **to pedestrians at all times;** and
- that will not be accessible by private vehicles at any time (with the exception of emergency services and public/authority services).
- The provision of at least 4.5% of the total site (576 square metres) for public open space which fronts Doonside Street and adjoins the pedestrian lane. The plan must show the area of public open space in square metres and its percentage of overall site area; and
- **Indicative** vehicular, pedestrian, cyclist and loading access points and connections.

BUILT FORM GUIDELINES

Built form guidelines which provide the following:

- ~~Maximum~~ **Indicative** building heights and envelopes responding to the site context;
- Building setbacks from street boundaries ~~that ensure that new future development does not overwhelm the scale of the heritage buildings on the site or on heritage places in the vicinity of the site, including dwellings on the south side of Appleton Street;~~ **SJ comment: Setbacks to achieve this objective are already nominated below. This point is therefore unnecessary as it suggests setbacks greater than these provisions may be necessary.**
- Building setbacks from the facades of 81-95 Burnley Street that ensure the heritage building can be understood as having a three dimensional form;
- Minimum upper level (above podium) setbacks of:
 - 13 metres from the Appleton Street site boundary.

YARRA PLANNING SCHEME

- 10 metres from the Burnley Street site boundary.
- 8 and 5 metres from the Doonside Street site boundary.
- Ensure new buildings are well spaced (minimum of 9 metres between buildings above podium) **unless a reduced setback can be justified based on the layout of the built envelopes;**
- Buildings set back a minimum of 10 metres (above podium) from the heritage building at 26-34 Doonside Street;
- Inter-floor heights within the heritage buildings on the site to ensure they relate to the existing floor levels and/or fenestration patterns;
- Active frontages to Burnley Street, open space and the pedestrian lane, as appropriate; - **SJ Comment: This point refers to Burnley Street and yet the Indicative Framework Plan does not.**
- Massing diagrams that model the proposed built form envelopes based on the indicative heights and setbacks;
- Shadow diagrams that demonstrate:
 - no unreasonable overshadowing of Doonside Street public open space area and – **SJ Comment: Unclear what is considered “unreasonable”. Recommend this be clarified**
 - no overshadowing of private properties on the southern side of Appleton Street beyond that caused by a building of 11m when measured between the hours of 10:00am and 2:00pm at the September Equinox.
- Indicative palette of building materials and architectural treatments throughout the site. The design and use of materials must be respectful of the industrial heritage of the site and its surrounds to the north and east, as well as to the residential heritage to the south.
- Provide for high quality architecture and spaces throughout the site and respond to heritage places through, as appropriate:
 - ~~Use of lightweight materials~~ **SJ Comment: This point is unnecessary – materials and finishes covered by the point above**
 - Simple architectural detail so as not to detract from significant elements of heritage buildings
 - ~~Discouraging highly articulated facades with recessed and projecting elements~~
 - ~~Ensuring the retention of solid built form behind retained facades and avoiding balconies behind existing openings~~ **These points appear to be preempting an outcome that may in fact be appropriate for some areas on the site but would be explored at the planning permit stage as part of a detailed design. Considered to be too prescriptive for the DP**
 - Providing high quality treatments to building facades facing the pedestrian lane.
- Ensure car parking is screened by buildings and not clearly visible from the street, or otherwise located in basement areas;
- ~~Ensure buildings are designed to ameliorate adverse wind conditions at street level, public spaces and lower level dwellings;~~ **This point is unnecessary given the point below regarding the requirement for guidelines to mitigate adverse impacts of wind**
- Ensure buildings are designed along Appleton St to break up the form of the street wall.
- Guidelines to mitigate adverse impacts of wind effects in building design.
- Minimise vehicle access and traffic movements in Appleton Street.

OPEN SPACE AND LANDSCAPE

A Landscape Concept Plan must be prepared that provides:

- Dimensions **of communal and public open space** to the satisfaction of the Responsible Authority;
- An overall landscape masterplan for the site that includes landscape concepts for proposed

open space and improvements along Appleton Street and Doonside Street;

- A written description of the management of the open space, pedestrian lane and other landscaped areas, including sustainable irrigation principles such as water sensitive urban design opportunities; and
- Details of how the Landscape Concept Plan responds to any requirements of the site remediation strategy for the land.

PUBLIC REALM PLAN

SJ Comment: This Public Realm Plan could be read as suggesting that the proposed development will incorporate modifications beyond what might be reasonably expected of a proposal to reinstate public realm infrastructure. Recommend this section be clarified with Council and refined accordingly.

A Public Realm Plan must be prepared to the satisfaction of the Responsible Authority. The Public Realm Plan must detail how the development will contribute towards improving the public realm adjacent to the site and provide the following information:

- Principles for how future development will contribute to improving the public realm and promoting inviting, pedestrian-friendly public spaces.
- The locations of public realm infrastructure works such as footpaths, bike paths, street lighting and furniture, and street trees, including:
 - Streetscape and public realm improvements to Doonside Street;
 - Streetscape and public realm improvements to Appleton Street; and
 - A minimum nine (9) metre wide pedestrian lane connecting Doonside Street and Appleton Street at the approximate mid-point of the Site, generally in accordance with the *Indicative Framework Plan* at Figure 1. – **SJ: It is noted that this space is not to be publicly owned**

HOUSING DIVERSITY REPORT

A Housing Diversity and Adaptability Report must be prepared to the satisfaction of the Responsible Authority which provides the following information:

- A demographic analysis of the types of people and households anticipated to live within the development based on the proposed dwelling design and bedroom mix.
- The model to provide 10% of the overall housing stock as affordable housing.
- Demonstrate how the development plan responds to the particular housing needs of future residents across their lifetime.

~~ECONOMIC ASSESSMENT~~

~~An economic assessment must be prepared which identifies, as appropriate, viable employment generating uses for the site.~~ **SJ Comment:** See evidence statement for the justification relating to this deletion.

TRANSPORT ASSESSMENT

A Traffic Impact Assessment Report (TIAR) prepared by a suitably qualified traffic engineer to the satisfaction of the Responsible Authority and Vic Roads. The Traffic Impact Assessment must include and demonstrate the following:

- An existing conditions assessment.
- ~~Details of any development staging.~~ **This Requirement is referred to below**
- A site layout plan showing convenient and safe primary vehicle access, including:
 - Primary vehicle access to and from Doonside Street;

YARRA PLANNING SCHEME

- Any vehicle access to Appleton Street to be a secondary access point;
- No direct vehicle access to or from the site via Burnley Street.
- Details regarding the **indicative** layout, ~~cross-section~~ and function of any internal street or laneway network. On site car parking and bicycle parking provisions and allocations.
- Expected traffic volumes and impact on the existing road network, including ~~but not necessarily limited to~~ Doonside Street, Appleton Street and Burnley Street. This assessment is to include details of any assumptions relied upon. **SJ Comment: Unclear why streets beyond those referred to should be considered in this assessment.**
- The TIAR is to include consideration of any development stages and approved/current development applications within the immediate area surrounding the site. The assessment is to identify mitigating works required for each development stage in the Development Plan
 - assess whether a two way or a four way signalised intersection between Burnley Street/Doonside Street/Buckingham Street is required and the trigger for providing the signalised intersection to the satisfaction of VicRoads
 - identify a new intersection layout and operation, if required, approved by VicRoads in consultation with the Responsible Authority.
- Details of any works or treatments proposed to Doonside Street or Appleton Street or the nearby road network.
- Details regarding the impact on pedestrian and bicycle routes.
- Measures to reduce conflict and improve pedestrian and bicycle amenity (**if applicable**)
- ~~Details regarding~~ **Indicative** loading arrangements, with loading to be undertaken on site and conflict between the loading bay(s) and car parking areas and non-motorised transport to be minimised. **SJ Comment: Difficult to provide detailed information until each building is designed and loading requirements understood.**
- ~~Access to the site by trucks is to be via Doonside Street.~~ **SJ Comment: This is repetitive**
- ~~Details regarding on-site waste collection, with waste vehicles accessing the site from Doonside Street.~~ **SJ Comment: Difficult to provide detailed information on waste collection until each building is designed and waste areas determined. This is more appropriate for the permit stage**

GREEN TRAVEL PLAN

A Green Travel Plan must demonstrate that the development supports sustainable transport alternatives to the motor car, ~~provides~~ **considers the opportunity for** on site car share spaces and ~~provides~~ bicycle parking and storage facilities. It must be prepared to the satisfaction of the Responsible Authority and prepared by a qualified traffic engineer. **SJ Comment: This plan can only put forward a broad approach to sustainable transport options but can not stipulate the exact provision of certain facilities.**

ENVIRONMENTALLY SUSTAINABLE DESIGN (ESD)

An environmentally sustainable design ~~assessment~~ **report** must be prepared to the satisfaction of the Responsible Authority which sets out how future development may achieve:

- WSUD objectives ~~and requirements~~ pursuant to the planning scheme; and
- ESD objectives ~~and requirements~~ pursuant to the planning scheme – **SJ Comment: Until the individual buildings are designed, the exact compliance with requirements of the planning scheme is not possible.**

DRAINAGE

A drainage assessment must be prepared to the satisfaction of the Responsible Authority which

includes:

- A catchment analysis of the existing storm water drainage system in Burnley Street and Doonside Street;
- A capacity assessment for the existing drainage system into which future development will be discharged; and
- A flood analysis which determines the overland flow depth within the road reserve during a 1 in 100 year flood.

HERITAGE

A heritage impact statement must be prepared by a suitably qualified professional to the satisfaction of the Responsible Authority that:

- Assesses the impact of the proposed development on the heritage values of the heritage place and nearby heritage places,
- Addresses the retention, restoration, redevelopment and adaptive reuse of the heritage buildings (81-95 Burnley Street and 26-34 Doonside Street); and heritage façade (Burnley Street);
- Assesses the impacts on the context and setting of heritage places in the vicinity of the site;
- Addresses the retention, recording and interpretation of links to the site's history and industrial past including interpretive panels depicting that past; and
- Provides a siteline analysis and 3D modeling of the proposed development from key view points in the public realm to enable an assessment of the visual impact of the development on heritage places, in particular 26 Doonside Street.

DEVELOPMENT STAGING

A staging plan to provide an indication of the likely staging of the development of land, specifically:

- The expected sequencing of development;
- The expected sequencing of works identified in the Public Realm Plan approved in accordance with this schedule;
- Likely vehicle access points, road infrastructure works and traffic management; and
- Interface/access treatments.

COMMUNITY CONSULTATION

The Development Plan shall be available for public inspection and submission for 28 days prior to its consideration by the Responsible Authority. Any submissions must be considered by the Responsible Authority in its decision.

