Date: 8 May 2018

Proposed Amendment GC81 to the Port Phillip Planning Scheme
Fishermans Bend

Stage 2 – Wirraway Precinct Submissions on behalf of the City of Port Phillip
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Introduction

Overview

1. Much has been made of the desire for Wirraway to be a family friendly neighbourhood, and in Council’s contention, it has the potential to be much more than this. The Government’s September 2016 Vision speaks to this opportunity. However, Council submits that:

- changes are required to the exhibited Amendment GC81 to realise this Vision; and
- the Panel ought not be persuaded by the submissions of many of the landowners that are aimed at realigning the Vision back towards the outcomes that were the reason for the entire ‘recast’ process.

Today’s submissions will explain:

- how Council has analysed and tested elements of Amendment GC81 that relate to Wirraway;
- the changes Council proposes because of that testing; and
- the cumulative effect of these changes.

2. As was the case with Council’s Stage 2 Overarching Submission, and the precinct based submissions that have followed for Montague and Sandridge, Council has informed itself by detailed urban design work in relation to Wirraway. This work is conveyed in an Urban Design Report for Wirraway which is provided to assist the Planning Review Panel (the Advisory Committee) in its deliberations.

3. The key outcomes that Council proposes for Wirraway, having regard to the Vision, are as follows:

- Creation of a retail and lifestyle precinct at the intersection of Plummer Street, Salmon Street and around a series of new laneways and urban plazas to provide convenience shopping, a potential cinema and a fresh food market.

- A lower scale, more intimate feel than Sandridge, with a wide range of mid-rise building typologies containing internal courtyards, green walls and green roofs.

- Development of Plummer Street as the key east-west civic boulevard to connect Wirraway to the Sandridge Core Retail Area.
A mix of residential and commercial uses in the Core Area with the opportunity for more additional commercial uses and service industries in Non-Core Areas closer to the West Gate Freeway.

A range of improved, expanded and new open spaces to encourage active and passive recreation, contemplation, informal small gatherings and play. These include:

- the existing JL Murphy Reserve;
- the creation of Prohasky Park (which is encompass the existing Howe Reserve);
- the proposed Wirraway North Park; and
- a series of linear parks that connect these spaces.

A range of community facilities to cater for residents, families and workers including:

- a Sport and Recreation Hub within the proposed Prohasky Park to terminate the western vista of Plummer Street and activate the open space;
- a landmark Art and Cultural Hub opposite JL Murphy Reserve on Plummer Street;
- a pair of Education and Community Hubs comprising a primary and a secondary school also near JL Murphy Reserve; and
- an additional Education and Community Hub comprising a primary school located along the Tarver Street linear open space in a location that is approximately half way between JL Murphy Road and the new Prohasky Park.

Vehicle, cycling and pedestrian bridge connections from Wirraway into the Employment Precinct.

Improved amenity underneath the transmission lines.

A transition and connections to surrounding established neighbourhoods of Port Melbourne and Garden City.

These are all shown below on Council’s ‘key moves plan’ which has been reproduced from its Wirraway Urban Design Report.
4. As part of its analysis, and as noted in its Stage 2 Overarching Submissions, Council has prepared two 3D built form testing models to inform its position on Amendment GC81.

5. The first model is based on the outcomes provided for by DDO30. It is a simple extrusion model of potential 3D building envelopes that shows the various height, setback and
overshadowing controls relative to land ownership patterns as well as existing and proposed streets and laneways to understand the possible built form outcomes allowed for by Amendment GC81. It provides a different perspective to Ms Hodyl’s model which is predominantly based on the FAR controls, and which does not reflect the lane locations shown in the Framework. Thus, Council’s 3D model provides a good reference point to the maximum development outcome including FAU, while Ms Hodyl’s essentially shows the minimum (i.e. FAR only)\(^1\).

6. The second model illustrates the cumulative effects of Council’s proposed changes to Amendment GC81 as they relate to heights, setbacks and urban structural elements such as the location of parks, community hubs, streets and laneways. So, in other words, this second model shows the development outcomes that are possible per Council’s proposed changes to Amendment GC81.

7. In both models, floorplate assumptions were applied to create realistic building envelopes as per those described at paragraph 134 of Council’s Stage 2 Overarching Submission and the Urban Design Report that accompanied that submission.

**Key issues**

8. Council submits that the key issues in relation to Wirraway are as follows:

- A lack of adequate guidance about the built form outcomes and architectural typologies that are anticipated for Wirraway.

- Laneways in Wirraway result in street blocks that are too large in Non-Core Areas and in long narrow building envelopes along Plummer Street.

- Specific sites for community hubs are not identified.

- The Sport and Recreation Hub and the Art and Cultural Hub are unlikely to be feasible for delivery within the proposed delivery model that aims to incorporate them into a mixed-use building via an opt-in investigation area.

- The investigation area for the Sport and Recreation Hub is unlikely to result in a suitable site for the Hub.

- The Wirraway Health and Wellbeing Hub is best located in Sandridge.

- There is a shortage of schools planned for Wirraway (and Fishermans Bend more broadly).

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\(^1\) It is important to note that Mr Sheppard’s assessment is based largely on Ms Hodyl’s 3D assessment supplemented by some limited modelling carried out by David Lock & Associates.
A Core Retail Area is not identified, or planned for Wirraway which may result in anchor retail land uses being ‘crowded out’ by residential uses.

The Primary Active Frontage stretches too far along Plummer Street.

There is no documented future urban structure defined for Wirraway in Amendment GC81.

The 24-storey height limit in the Core Area of Wirraway is not consistent with the Vision.

The proposed street wall conditions in the Core Area of Wirraway along Plummer Street create a stepped / wedding cake outcome and do not reinforce the primacy of Plummer Street or create a fine grain character.

The desire for ground level communal open space in perimeter block or courtyard style developments in the Non-Core Area of Wirraway is likely to be frustrated by the need to accommodate car parking.

Summary of Council’s position on the key issues

Built form outcomes and architectural typologies

9. The character area / neighbourhoods as proposed in the MSS for Wirraway should be modified in the manner shown in these submissions. This would allow for more refined guidance to be provided about the built form outcomes and architectural typologies that are anticipated for Wirraway.

10. Further to this, a precinct-specific DDO schedule should be created for Wirraway (as well as for other precincts per Council’s previous submissions), including statements relating to the preferred built form outcome and architectural typologies for each neighbourhood within the precinct.

11. Given that the preferred character statements outline built form outcomes, Council submits that they ought to provide the basis for exercising discretion under the DDO. On this basis, Council considers that this is the most appropriate location for the sub-precinct character statements.

Laneways

12. Laneways in Wirraway should be reoriented to run predominantly perpendicular to Plummer Street and should be 12 metres wide.
13. Large blocks in the Non-Core Area of Wirraway should be broken up into building widths of no more than 50 metres in length through breaks in buildings, through block links and/or laneways.

Community Hubs

14. The Health and Wellbeing Hub should be relocated to the Core Area of Sandridge.

15. The Sport and Recreation Hub should be located within the proposed Prohasky Park at the termination of Plummer Street.

16. A primary school based Education and Community Hub and the Art and Cultural Hub should be located along Plummer Street within the Goodman owned land.

17. A second primary school based Education and Community Hub for Wirraway should be located at the corner of Tarver Street and Smith Street.

18. The secondary school based Education and Community Hub should be located on the government owned land on the corner of Plummer Street and Graham Street.

Core Retail Area and active frontages

19. A 'Core Retail Area' should be identified on the four blocks fronting the intersection of Plummer Street and Salmon Street, with Primary Active Frontages limited to Plummer and Salmon Streets in this area.

20. The remainder of Plummer Street should be changed to be a Secondary Active Frontage.

Future Urban Structure

21. An Urban Structure Plan in the form proposed by Council should be included within CCZ1 to help guide land use and development decisions.

Building and street wall heights

22. The Core Area of Wirraway should be limited to a discretionary building height of 15 storeys.

23. A 'tooth and gap' approach should be applied to heights along Plummer Street to better balance the amenity of the street with its built form presence.

24. Communal open space in the Non-Core Area of Wirraway should be allowed to occur on the first level if it is accessible from the street level and decked above a sleeved, ground floor car parking area.
Submissions

Built form outcomes and architectural typologies

25. Council has made a range of general submissions regarding the need for more refined statements about the built form outcomes and architectural typologies. This precinct based submission makes further submissions about where they should apply and how they ought to be given effect for Wirraway.

26. Council recommends that the character areas / neighbourhoods that are currently proposed for Wirraway in the MSS be modified in the manner shown in the below diagram.

![Diagram of Wirraway sub-precincts](image)

Figure 2. Changes to Wirraway sub-precincts proposed by Council

27. As well as proposing changes to the boundaries of these sub-precincts, Council also proposes that further information is added to the map of character areas which explains the preferred building typologies for each of the neighbourhoods. This is shown below.
28. Given that the proposed preferred character statements concern built form outcomes, Council submits that this ought to be the basis for exercising discretion under the DDO. On this basis, Council considers that they should be included within the DDO, rather than the MSS.

29. Accompanying this, a precinct-specific DDO schedule should be created for Wirraway (as well as for other the precincts per Council’s other submissions on this issue), including statements relating to the preferred built form outcome and architectural typologies for each neighbourhood within the precinct.

Laneways

30. Council understands that the Minister now proposes to show indicative locations of laneways within CCZ1 and require development to be generally in accordance with these locations. Council supports this approach.

31. As demonstrated in Council’s Overarching and Sandridge Urban Design Reports, the location of laneways can significantly alter development outcomes. As is the case in Sandridge, Amendment GC81 proposes predominantly east-west laneways in Wirraway, particularly near Plummer Street. This results in narrow building envelopes and poor solar orientation.

32. Proposed north-south laneways in Wirraway are sparingly spaced creating blocks of almost 200 metres in length. Conversely, east-west laneways create narrow blocks of that are as small as 35 metres.
33. Council proposes that a greater proportion of north-south laneways would address these issues. This is shown below.
In addition to this spatial reorganisation, Council recommends that laneways in Wirraway are increased to a width of 12 metres\(^2\). This will provide opportunities for landscaping and tree planting to enhance the landscape character of Wirraway and allow for a greater sense of address. The proposed width of 12 metres creates a point of difference to the more urban character in Sandridge where 9 metres wide lanes are sought. Council considers that this will help to reinforce the Vision for Wirraway.

**Community Hubs**

35. As outlined at each stage of the Hearing, Council considers that the nomination of specific sites for future community hubs is required to ensure that they can be feasibly delivered when they are required and to an appropriate standard. This would entail identifying the site, costing the infrastructure and then including it in a DCP.

36. Per Council’s Sandridge Submission, it is submitted that the Health and Wellbeing Hub proposed for Wirraway ought to be relocated to the core of Sandridge so that it is more

\(^2\) This change necessitates a change to the definition of laneways in the DDO.
centrally located to serve a broader catchment within Fishermans Bend (noting one is not proposed in Sandridge or Montague).

**Sports and Recreation Hub**

37. As noted throughout submissions to the Hearing, Council relies on the Mesh Report which outlines the difficulties of locating Sport and Recreation Hubs within mixed use buildings.

38. In relation to Wirraway, this issue is compounded by the fact that the investigation area for this hub is such that only a few sites are large enough to accommodate the facility. When one also considers the 4-storey height limit in this location, it is obvious that the proposed approach is inadequate.

39. Council therefore considers that a specific stand-alone site must be earmarked for the Wirraway Sport and Recreation Hub.

40. Such is the case with its submission to the Montague Precinct Hearing, Council also considers that there are substantial benefits associated with co-locating such a facility within a large area of open space. Council accordingly submits that the Wirraway Sport and Recreation Hub should be located within the proposed Prohasky Park. A key benefit of this location is also that it has the potential to create a major civic presence at the termination of the Plummer Street Civic Boulevard and will help to activate the park (refer to Recommendation 3 and Figure 12 in the Wirraway Urban Design Report).

**Art and Cultural Hub**

41. Given that Art and Cultural Hubs are likely to accommodate performing arts spaces, Council considers that it is likely that these types of facilities will encounter similar difficulties to Sport and Recreation Hubs and may not be feasible to deliver within a mixed-use building.

42. Council also considers that an Art and Cultural Hub has the potential to form a major placemaking role in the development of Wirraway and thus, that a prominent location on the Plummer Street Civic Boulevard adjacent to public open space that is close to the key retail area ought to be selected.

43. It is also noted that the submission from Goodman indicates a desire to deliver a series of community hubs on its land. Council has accordingly suggested a location on Goodman’s land for this important hub.

**Education and Community Hubs**

44. As outlined in Council’s Stage 1 Submission to the Hearing, there is likely to be a significant shortfall in school provision in Fishermans Bend when one considers the projected demographic profile for the area per DELWP’s Demographic Report. This shortfall will be
compounded if Council's concerns around the significant additional population that is likely to reside in Fishermans Bend come to fruition.

45. For this reason, Council has proposed two primary school based Education and Community Hubs in Wirraway (as opposed to the one proposed by the Framework).

46. One site is proposed opposite JL Murphy Reserve within the Goodman land for reasons similar to those outlined above for the Arts and Cultural Hub. A second site is proposed along Tarver Street approximately halfway between JL Murphy Reserve and the proposed Prohasky Park. This location has the added benefit of being located on what is likely to be a quieter street and will have the benefit to be flanked by a linear open space reserve which will help to encourage active transport to the school and provide easy access to the two large open space areas.

47. In relation to the secondary school based Education and Community Hub which was announced for funding in the recent State Budget, Council has suggested the government owned land on the corner of Plummer Street and Graham Street abutting JL Murphy Reserve (noting that the Government is yet to confirm a site in relation to the State Budget announcement).

48. These sites are shown in the below map.
Core Retail Area and active frontages

49. Council has advocated throughout this process for the definition of ‘Core Retail Areas’ within the broader ‘Core Areas’ that are defined in Amendment GC81. The reasons for this position are not re-stated here.

50. As it applies to Wirraway, Council considers that the corner of Plummer Street and Salmon Street should be the centre of activity for the precinct. This would not appear to be a particularly controversial proposition. Council accordingly considers that the four street blocks fronting this intersection should be identified as the Core Retail Area for Wirraway.

51. The proposed identification of a Core Retail Area has flow on effects for the designation of Primary and Secondary Active Frontages on Plummer and Salmon Streets. Council submits that the Primary Active Frontages should be confined to this area, while the Secondary Active Frontage should continue in either direction from that point along Plummer Street and in other streets within the broader Core Area.

52. Council also recommends that Secondary Active Frontages are applied to one laneway per block in the Core Retail Area. This will ensure that key lanes are activated with retail and commercial uses, provide a continuity of activity through the centre of large blocks and provide the opportunity for a different retail offer.

53. This change in the designation of active frontages will ensure that the Plummer Street in this central part of Wirraway will be a vibrant hub of activity (noting that the Amendment GC81 proposed to activate an extremely long section of Plummer Street of approximately 700 metres).

54. These changes are shown below.
In addition, and in line with previous submissions, Council seeks the application of the DPO to this Core Retail Area to ensure that key anchor land uses are protected, and that detailed master planning to knit these uses into the urban structure are also proposed. Additionally, the DPO could assist with integrating/planning for the Metro Station in this location should it take the southern alignment through Wirraway.

Urban Structure

As is the case with retail, Council has consistently sought the greater expression of urban structure within Amendment GC81. Again, the reasons for this do not need to be re-stated here. A proposed urban structure which can guide land use decisions within CCZ1 is included below and can be found on page 25 of the Wirraway Urban Design Report.

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3 Council also supports the application of the DPO to the contiguously owned Goodman properties in Wirraway and Sandridge to enable them to pursue a master planned approach to their development and to achieve, amongst other things, the redistribution of FAU across their site in line with that master plan.
Building and street wall heights

Plummer Street

57. Plummer Street, and the broader Wirraway Core Area is intended under the Vision to have a lower scale, more intimate feel than is the case along Fennell Street in Sandridge.

58. Council considers that this will be achieved through the delivery of predominantly mid-rise scale buildings, with some taller elements.

59. However, Amendment GC81 proposes to apply a 24-storey height limit on a significant part of the Core Area of Wirraway. Council submits that this is incongruent with the intention for this area, and ought to be avoided. Council submits that this area be nominated for a 15-storey height limit.

60. The proposed maximum height of 24 storeys is inconsistent with the vision for a mid-rise precinct.

61. Due to the overshadowing controls along Plummer Street, the highest buildings (24 storeys) are located away from Plummer Street. This creates streets which have tall buildings along one side and much lower buildings on the other side (e.g. 4, 6 and 12 storeys). This creates a poor transition and scale imbalance to these lower scale heights. It also detracts from legibility and the role of Plummer Street as the primary street in Wirraway (for further information regarding this, refer to Figures 16 and 18 on pages 28 and 29 of the Wirraway Urban Design Report).

62. The proposed 6 storey street wall along Plummer Street with 12 and 24 storeys to the north creates an undesirable stepped ‘wedding cake’ type outcome to comply with the
overshadowing controls and ensure a high amenity environment on the south side of Plummer Street.

63. Council submits that a version of its proposed ‘tooth and gap’ approach proposed as part of the Montague Urban Design Report should be applied to buildings along Plummer Street to deliver a better balance between sunlight penetration and built form presence.

64. The ‘tooth and gap’ approach consists of setting a lower base building height and then allowing taller elements to be built sheer to the street for part of the frontage. It has been used in the Massena Quarter in Paris (refer to the Wirraway Urban Design Report for detail regarding this).

65. To work effectively for Plummer Street, the tooth and gap approach requires the following controls:
- Development not exceeding 8 storeys in height along the north side of Plummer Street (to avoid overshadowing the southern footpath at the September Equinox) (reduced from 12 storeys) and 15 storeys along the south side of Plummer Street (reduced from 24 storeys).

- For sites with a frontage to Plummer Street of 50 metres or wider, at least 20 percent of the building height at the street edge must be 4 storeys in height with the remaining height up to 8 storeys.

- Any element higher than 4 storeys must not be wider than 30 metres and any element above 4 storeys must also be adjacent to a 4 storey element.

- For sites with a frontage of less than 50 metres, at least 40 percent of the building height at the street edge must be 4 storeys in height with the remaining height may be up to the discretionary height limit.

- For all sites with a frontage to Plummer Street, within a depth of 20 metres from the street frontage, buildings should be built sheer to the street and should not include pop-up levels or upper level setbacks.

- Limit the length of taller elements along lanes to 40 metres.

66. The “tooth and gap” approach creates a more articulated and varied street edge than what could be achieved with a continuous 8 storey street wall and upper level setback

67. This approach (and accompanying changes to building heights) has the benefit of:

- breaking up the building massing and creating a finer grain outcome;
- creating slender vertical elements and narrow and fast moving shadows at the street level;
- presenting a more appropriate scale to the Plummer Street Civic Boulevard;
- providing development opportunities appropriate to the location;
- allowing variation between the northern and southern side of the street, with higher elements up to 15 storeys permitted on the southern side; and
- providing a more appropriate transition to lower heights to the north and south of Plummer Street.

68. Figures 22, 26 and 28 on Pages 32, 35 and 36 respectively of the Wirraway Urban Design Report illustrate this approach. Figure 29 on Page 37 illustrates the proposed changes to building heights.
Sites with a frontage to Plummer Street less than 50m:
- At least 40 percent of the building height at the street frontage must be 4 to 6 storeys in height.

Sites with a frontage to Plummer Street of 50m or wider:
- At least 70 percent of the building height at the street frontage must be 4 storeys in height.
- Maximum width to the street of 30m for higher elements (above 4 storeys).
- Elements above 4 storeys must be adjacent to a 4 storey area.

All sites along Plummer Street:
- No upper level setbacks or pop-up elements within a depth of 20m from the street frontage.

6 storey street front with upper level setbacks to 15 storey. Taller elements along Turner Street and new street north of Plummer Street—see above.

Figure 22: Plummer Street tooth and gap approach proposed by Council

Figure 26: Aerial view of built form outcomes proposed by Council
Reduced maximum building height of 5 storeys along the southern side of the new street reduces the scale imbalance with the 6-11 storeys on the northern side of the street.

Teet and gap approach along Flinders Street ranges from 4-5 storeys along rear side, and 4-15 storeys along south side.

Reduced maximum building height of 5 storeys reduces the scale imbalance with the maximum building height of 4 storeys on the southern side of Turner Street.

Figure 26. Section showing building height controls proposed by Council.

Mid-rise development

69. As outlined in Council’s Overarching Urban Design Report, Council benchmarked a series of mid-rise developments to understand the key characteristics of this form of development. This benchmarking was then used to assess Amendment GC81, with regard for the Non-Core blocks of Wirraway.

70. The modelling demonstrated the following (see Figures 30 and 31 below from Pages 39-41 of the Wirraway Urban Design Report):

- Block sizes in Wirraway are too large (block dimensions of approximately 200 metres by 100 metres) and should be broken up to ensure permeability, avoid long monotonous facades and maintain a human scale of development.

- The application of the 30 percent communal open space requirement and 70 percent site coverage requirement is critical in supporting adequate separation distances between buildings and space around buildings. However, raised communal open space would be required to accommodate sleeved car parking at ground level (noting that basement car-parking is unlikely to be feasible).
A 6-storey street wall edge aligning with the street will create an appropriate scale and street enclosure of 1:1 ratio with new streets of 22 metres in width, ensuring sky views.

Laneways of 12 metres in width provide better street and building amenity and contribute to the character of Wirraway.

Laneways provide opportunities for lower scaled built form such as blocks and row houses creating a street enclosure of 1.3:1 for a 4 storey street wall height to ensure better sky views and amenity to the street and within buildings.

Wirraway Block A
- Non-Core Area (FAR 2:1)
- 70 percent site coverage providing 30 percent communal open space
- 6 storey discretionary height limit
- Site size – 96m x 186m, site area – 28,225 sqm
- Developable area – 17,856 sqm (providing for a 32m wide road to the south and a 34m wide extension of Woodboard Road (including a 12m linear park) to the north).

Figure 30. Location of Wirraway Block A (535-541 Graham Street)

70 percent site coverage could deliver a courtyard block typology at 6 storeys. However, no laneways are proposed to break up the building mass, resulting in potentially up to 168m wide buildings fronting streets.

Figure 31. Potential built form outcome (DDO Model)
Maddocks

Hawke + King, West Melbourne

122 Rosemouth Street, Clifton Hill

West End, West Melbourne

221 Kerr Street, Fitzroy
71. Based on the benchmarking, Council submits that the following is required:

- Provision of a minimum area of communal open space in all developments in Non-Core Areas of Wirraway.
- Allowance for communal open space to be provided above on the first level to accommodate car parking where direct access to the street from the communal open space is provided.
- Sleeving and integration of car parking at street level and above (where provided).
- Adequate separation distances between buildings.
- Diversity within the development through different built form scales such as low rise fronting the lanes and taller heights on the edges.
- Address transitions in building height by whole buildings rather than rather than a stepped / ‘wedding cake’ approach.
- Create permeability through the blocks through lanes or breaks in buildings.
- Break up large blocks into smaller, more human scaled buildings by limiting mid-rise building lengths to 50 metres through the provision of lanes or through block links or breaks in buildings to provide more opportunities for individual identity, allow for better views/outlook, daylight and sunlight to dwellings and communal spaces and reduce the impact of large, slow moving shadows.

72. The figure from Page 42 of the Urban Design Report illustrates two examples of outcomes which illustrate these principles.
Specific changes requested

73. The various recommendations set out in the Wirraway Report should be adopted. They include the following outcomes and changes:

- Amend the character areas / neighbourhoods that are currently proposed for Wirraway in the MSS in the manner shown in these submissions.
- Create a precinct-specific DDO schedule for Wirraway which includes statements relating to the preferred built form outcome and architectural typologies for each neighbourhood within the precinct.
- Amend the CCZ1 and DDO30 to show laneways as per this submission, until further work is undertaken through detailed Precinct Planning.
- Amend DDO30 to specify a minimum width of 12 metres for laneways in Wirraway and make the corresponding change to the definition of laneway in the Wirraway DDO.
- Include a plan in the CCZ1 showing the Wirraway Urban Structure as per this submission.
▪ Locate the Wirraway Art and Cultural Hub on Plummer Street (part of 62 Salmon Street) abutting the proposed public open space.

▪ Locate the Wirraway Education and Community Hub (Secondary School) on the government owned land adjacent to JL Murphy Reserve (477 Graham Street).

▪ Locate the Wirraway Education and Community Hub (Primary School) on the corner of Tarver Street and Smith Street (21 Smith Street).

▪ Nominate an additional Wirraway Education and Community Hub (Primary School) on the Goodman owned land directly north of JL Murphy Reserve (within 62 Salmon Street).

▪ Move the Wirraway Health and Wellbeing Hub to Sandridge.

▪ Amend Active Frontages in DDO30 and CCZ1 as per this submission.

▪ Nominate the Core Retail Area in Wirraway as the four street blocks at the intersection of Plummer Street and Salmon Street.

▪ Identify one north-south lane per block within the Core Retail Area as a Secondary Active Frontage.

▪ Apply a DPO to protect long term large floorplate anchor retail land use opportunities for the Core Retail Area in Wirraway.

▪ Reduce maximum building heights in DDO30 for the Wirraway Core to encourage a diversity of mid-rise building typologies by reducing all 24 storey areas to 15 storeys.

▪ Reduce all 12 storey areas on the northern side of Plummer Street in the Core Area to 8 storeys.

▪ Amend DDO30 to apply a ‘tooth and gap’ approach to sites with a frontage to Plummer Street in the Core Area, as per this submission.

▪ Amend the DDO30 as per Recommendations 8 and 14 in Council’s Overarching Urban Design Report to provide clarity for mid-rise built form outcomes.

**Closing**

74. This completes Council’s opening Wirraway submissions.

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Terry Montebello
Maddocks
Lawyers for Port Phillip City Council